



PROFESSIONAL
CERTIFICATION
COALITION

March 21, 2019

Representative Justin Slaughter
1234 W. 95th St.
Chicago, IL 60643
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Re: Illinois H.B. 3580

Dear Representative Slaughter:

The Professional Certification Coalition (PCC) writes to express concerns about the potential effects of H.B. 3580 as it pertains to private professional certification. In its current form, H.B. 3580 could be misinterpreted to restrict private certification organizations' enforcement of their ethics codes or eligibility requirements. In addition, it could be interpreted as invalidating licensure regulations that condition licensure on current private certification. Given that private certifications provide important assurances to the public that certified professionals have relevant qualifications and meet established standards, we request that the legislature modify the bill to avoid potential negative impacts.

The PCC is a nonprofit association founded last year to address legislative initiatives that affect professional certification programs and those who hold private certification credentials. The PCC currently has well over a 100 members, including non-governmental professional certification organizations, professional societies and service providers. The PCC's members reflect a full spectrum of professions, including practitioners in the healthcare, professional and civil engineers, human resources, financial, and information technology fields, among many others. The PCC advances the best interests of those who use or rely on professional certification—such as employers, reimbursers, and the general public—as well as of individual professionals themselves who achieve professional certification status, including many residents of Illinois. Our founding organizations – the American Society of Association Executives (the leading organization for association management) and the Institute for Credentialing Excellence (the leading developer of accreditation standards for professional certification programs) – serve as the Steering Committee for the PCC.

H.B. 3580 advances the important goal of reducing recidivism by making it easier for an ex-offender to earn a living in certain occupations – expanding access not only to employment under the current statute on certificates of good conduct, but also to “occupational licensing or housing.” We believe this is a worthy objective and support this important next step in national efforts to reform the criminal justice system and to ensure pathways to opportunity for ex-offenders.

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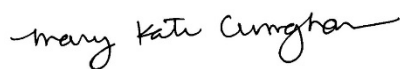
We are concerned, however, that H.B. 3580's provisions could be interpreted as intruding on the rights of private certification organizations to establish and enforce their own ethics codes or could interfere with enforcement of licensure laws that require current certification as a condition of licensure. The ethics codes of some private certification programs call for revocation or denial of certification due to certain criminal convictions relevant to the practice of a particular occupation; for example, convictions for sexual abuse of children typically lead to loss of certification for healthcare professionals, and convictions for embezzlement or fraud typically lead to loss of certification for financial professionals. We encourage the Illinois legislature to clarify that the language that a certificate of good conduct will "relieve an eligible offender of any ... occupational licensing ... bar" does not reach private certification programs. Specifically, we request the following amendments:

1. Adding a sentence to Section 5-5.5-25(a) that states: "For purposes of this Section, 'occupational licensing' means licensure conditions imposed by and enumerated in state law."
2. Adding a new sentence to Section 5-5.5-25(b)(iv):

"Nothing in this section shall be construed to require a private certification organization to grant or deny private certification to any individual, nor alter any requirement in a licensure statute or regulation for an individual to hold current private certification as a condition of licensure or renewal of licensure."

Thank you for your consideration of these amendments. If you have any questions regarding this letter, please feel free to reach out to us using the contact information identified below.

Sincerely,



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