



PROFESSIONAL
CERTIFICATION
COALITION

March 8, 2019

Senator John Allen
House of Representatives
1700 West Washington
Room 208
Phoenix, AZ 85007
jallen@azleg.gov

Re: Arizona H.B. 2660

Dear Senator Allen:

The Professional Certification Coalition (PCC) writes to express concerns about the potential effects of Arizona H.B. 2660 relating to occupational licensing reform. In its current form, H.B.2660 could be misinterpreted to restrict private certification organizations' enforcement of their ethics codes or eligibility requirements. In addition, it could be interpreted as restricting or invalidating licensure regulations that condition licensure on current private certification. Given the importance to the public of the assurances of relevant qualifications and meeting established standards that private certifications confer, the bill should be modified to avoid these potential 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 hundred members, including non-governmental professional certification organizations, professional societies and service providers. The PCC's members reflect a full spectrum of professions, including healthcare professionals, professional and civil engineers, human resources managers, financial professionals, and information technology professionals, 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 Arizona. 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.

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H.B. 2660 advances the important goal of reducing recidivism by making it easier for an ex-offender to earn a living in certain occupations. We believe this is a worthy objective and we are supportive of this important next step in national efforts to reform the criminal justice system and to ensure pathways to opportunity for ex-offenders. We also believe that there is no substitute for the subject matter expertise that serves as the foundation for developing professional certifications, whether those credentials are wholly voluntary or a recognized condition of holding an occupational license. Private certification organizations are in the best position to assess what profession-specific certification requirements, both substantive and conduct-related, are necessary to protect the public and to qualify for the organization's credentials.

In order to avoid interpretation of H.B. 2660's provisions as interfering with the rights of private certification organizations to establish and enforce their own ethics codes, the PCC encourages the Arizona Legislature to change all references to "certificate" to "**state issued certificate**", as well as any references to "any examination" to "**any examination developed and administered by the state**".

Further, some licensure regulations require licensed professionals to hold and maintain current certifications issued by private certification bodies. The PCC believes it is important to clarify that H.B. 2660 is not intended to remove those requirements from practice acts.

We recommend the inclusion of a new Section 41-1093.04(K) to address both of the concerns the PCC has identified, as follows:


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.

The PCC applauds Arizona for advancing important criminal justice reforms through H.B. 2660. We respectfully request, however, that you and your colleagues in the legislature amend the bill as we have requested above to avoid intruding the subject matter expertise of private certification organizations.

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.

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Sincerely,



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