



PROFESSIONAL
CERTIFICATION
COALITION

February 6, 2020

Representative Brandon Vick
John L. O'Brien Building
504 - 15th Avenue, SW
Room 465
Olympia, WA 98504
(Brandon.Vick@leg.wa.gov)

Re: Washington H.B. 2355

Dear Representative Vick:

The Professional Certification Coalition (PCC) writes to raise concerns regarding the potential negative effects of H.B. 2355, relating to occupational licensing reform. The PCC strongly opposes the bill's proposal to authorize a non-subject matter expert to create exceptions to exam-based licensure requirements in licensure exams. H.B. 2355 could have an adverse effect on the health, safety, and welfare of Washington State citizens who trust the state to bestow licenses only on professionals who have demonstrated they have met the widely accepted standards for competence, skill, and knowledge in the licensed profession. The professions in which exams are required for licensure are the very ones in which the legislature and/or the licensing agency have judged that an examination best demonstrates whether the individual – regardless of prior experience or training – has indeed mastered the baseline competencies needed in the profession.

The PCC is a nonprofit association founded in 2018 to address legislative initiatives that affect professional certification programs, those who hold private certification credentials, and the many constituencies that rely on professional certification as a signal of professional competence. The PCC currently has more than 100 organizational members, including non-governmental professional certification organizations, professional societies and service providers. The PCC's members reflect a wide spectrum of professions, including health care professionals, professional and civil engineers, 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, reimbursors, and the general public—as well as of individual professionals themselves who achieve professional certification status, including many residents of Washington. 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.

Unfortunately, H.B. 2355 would create an end-run around licensure requirements that require current private certification or state administered exams for initial licensure or renewal of licensure. These requirements protect the public from low-quality or harmful services.

Professional certification programs generally create a rigorous process of defining the expected knowledge, skills and abilities for their particular profession. Subject matter experts define the content domain for assessment based on their extensive knowledge of the profession, and the programs also gain input from others in the field in defining the areas of knowledge on which candidates will be assessed. Many certification programs engage professional psychometricians in developing their exams.

H.B. 2355 would substitute the test of competencies developed and recognized by subject matter experts in a relevant field with the judgment of the Department of Licensure as to what “training,” “experience,” or “observation” is equivalent to the demonstrated level of proficiency measured by professional certification exams. No umbrella state agency position can adequately assess whether training abroad or life or work experience in fact equips a professional to practice competently, with the threshold knowledge needed in all essential elements measured in certification and licensure exams. The Department of Licensure oversees the licensing of professions in which the proficiency of the licensed professionals is critical to ensuring the health, safety, and welfare of the public. These professions, all of which currently require passage of certification or licensure exams for licensure, include: architects, whose skills and knowledge are essential to assuring the integrity of the buildings they design; chemical engineers, civil engineers, electrical engineers, fire protection engineers, and nuclear engineers – all professions in which the safety implications of insufficient mastery of core competencies is readily apparent; funeral directors, who are trusted with the proper care of deceased Washington State citizens; certified real estate appraisers, whose level of proficiency is crucial to many commercial and personal financial transactions; and land surveyors, whose work provides the foundation for planning many infrastructure and building projects. While there may be multiple paths to achieving competency of skills in a profession, there is no substitute for exam-based measures of whether those paths in fact led to the individual mastering the required skills and knowledge that the public expects from licensed individuals. By conferring a license on untested individuals in professions that currently require passage of certification or licensure exam, Washington would be allowing the public to rely on potentially unqualified individuals.

The PCC applauds Washington for its efforts to remove unnecessary barriers to entry into professions. Certification programs, however, create strong policy guidelines to ensure their process is fair to all applicants and address a variety of important aspects of the certification process (requests for testing accommodations, test security processes, retake policies, etc.) to ensure the certification is legally defensible, assure accurate scores, and protect the integrity of the process. Indeed, employers rely on these quality practices in the certification process to assist their own employment practices. Moreover, demonstrating proficiency on a certification or licensure exam is the least discriminatory and most reliable measure of whether an individual is qualified to practice a profession for which passage of an exam is required.

With these considerations in mind, we request that you amend H.B. 2355 to protect the health, safety, and welfare of Washington State citizens by adding the following provision:

“Notwithstanding any other provision in this chapter, no competency-based licensing requirements shall be established for an occupational license issued by the department if the exam-based or certification requirements for the license are the same or substantially

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similar to the exam-based or certification requirements for licensure of that occupation in at least half of the other states.”

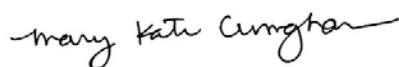
With inclusion of this provision, alternatives to exam-based licensure could be available for any occupations in which Washington State is in the minority in imposing examination-based obstacles to licensure, but the State would not be abandoning this important measure of baseline proficiency where exam-based assessment is the widely accepted entry requirement to a licensed profession.

In addition, to make clear that the intent of the bill is not to intrude into the function of non-governmental certification organizations or to eliminate current licensure requirements that incorporate private certification exams, we request that you also amend the bill to provide:

“Nothing in the chapter 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 this letter. 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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