



PROFESSIONAL
CERTIFICATION
COALITION

February 26, 2021

Representative Alejandro Rizo, Jr.
402 South Monroe Street
House Office Building, Room 1401
Tallahassee, FL 32399-1300
alex.rizo@myfloridahouse.gov

Re: H.B. 471

Dear Representative Rizo:

The Professional Certification Coalition (PCC) writes regarding H.B. 471, to address our concerns that it could weaken important occupational regulations that protect public health, safety, and welfare.

The PCC is a nonprofit association formed to address legislation that affects professional certification programs, those who hold private certification credentials, and the many constituencies that rely on professional certification. The PCC's organizational members include non-governmental professional certification organizations, professional societies, and service providers. The PCC's members reflect a wide spectrum of professions, including health care, engineering, financial services, and information technology, among many others. 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) – govern the PCC.

Members of the PCC provide certifications that communicate to the public that certified professionals have met established standards for knowledge, skill, and competency in their fields. Private certification is not a substitute for occupational licensure, however, in fields such as health care, safety-related roles, and the engineering and financial industries. For those occupations, regulatory agencies have incorporated the competency standards established by private professional certification programs into licensure requirements and play a critical role in enforcing competency and conduct standards. In professions for which state licensing boards have historically provided oversight, it would not serve the public interest to eliminate or weaken licensure requirements – subject to this temporary, emergency exception – and shift the enforcement function currently performed by licensure boards onto private certification programs. A private certification organization lacks the legal authority and the resources to serve as a substitute for a licensing board for a profession for which licensure is required to protect public health, safety, or welfare.

The PCC supports efforts to remove unnecessary barriers to entry into professions to promote market competition and employment opportunities. However, the PCC proposes amending the bill to **remove the provisions providing for automatic repeal of occupational licensing**

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regulatory programs and convert the provisions into a scheduled review of the programs, without automatic abolition.

In its current form, H.B. 471's automatic repeal provision could lead to inadvertently abolishing key licensing regulatory programs if, for example, the legislature cannot agree on how best to reform a board or fails to act prior to the end of a session.

Ours is not a hypothetical concern: in 2019, the Texas legislative session expired before bills to extend the Texas State Board of Plumbing Examiners were passed, abolishing the Board and all licensure laws governing installers of plumbing, gas, and medical gas systems. To reinstate vital protections for the safety of homeowners and the public of Texas at large, Governor Greg Abbott was forced to take executive action to extend the Board's activity past its automatically scheduled expiration date.

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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Current List of PCC Members

ABRET Neurodiagnostic
Credentialing &
Accreditation (ABRET)

ABSA International: the
Association for Biosafety
and Biosecurity (ABSA)

Academy of Nutrition and
Dietetics (AND)

Academy for Certification
of Vision Rehabilitation &
Education Professionals
(ACVREP)

Alliance of Hazardous
Materials Professionals

American Association of
Post-Acute Care Nurses
(AAPACN)

American Association of
Critical-Care Nurses
(AACN)

American Association of
Neuromuscular &
Electrodiagnostic
Medicine (AANEM)

American Association of
Professional Landmen

American Board for
Certification in Orthotics,
Prosthetics and Pedorthics
(ABCOP)

American Board of
Certification for
Gastroenterology Nurses
(ABCGN)

American Board of
Neuroscience Nursing
(ABNN)

American Board of Post-
Acute and Long-Term
Care Medicine (ABPLM)

American Board of Foot
and Ankle Surgery
(ABFAS)

American Board of Wound
Management (ABWM)

American Industrial
Hygiene Association
(AIHA)

American Medical
Certification Association
(AMCA)

American Nurses
Credentialing Center
(ANCC)

American Payroll
Association (APA)

American Road &
Transportation Builders
Association Foundation
(ARTBA)

American Society of
Association Executives
(ASAE)

American Society of Civil
Engineers (ASCE)

American Speech-
Language-Hearing
Association (ASHA)

American Traffic Safety
Services Association
(ATSSA)

American Translators
Association (ATA)

American Veterinary
Medical Association
(AVMA)

APICS (formerly the
American Production and
Inventory Control Society)

Association for Financial
Counseling & Planning
Education (AFCPE)

Association for Financial
Professionals (AFP)

Association of Surgical
Technologists (AST)

Behavior Analyst
Certification Board
(BACB)

Building Industry
Consulting Service
International (BICSI)

Board of
Certification/Accreditation
(BOC)

Board of Certified Safety
Professionals (BCSP)

Board of Pharmacy
Specialties (BPS)

Building Commissioning
Certification Board
(BCCB)

CCIM Institute (issues the
Certified Commercial
Investment Member
designation)

CFA Institute

Certification Board for
Music Therapists (CBMT)

Certification Board of
Infection Control and
Epidemiology (CBIC)

Certification Council for
Professional Dog Trainers

Certified Financial Planner
Board of Standards (CFP)

Certified Fund Raising
Executive International
(CFRE)

Commercial Real Estate
Certification Institute

Commission for Case
Manager Certification
(CCMC)

Commission on Nurse
Certification (CNC)

CompTIA

Community Association
Institute (CAI)

Construction Management
Association of America
(CMAA)

Council of Engineering
and Scientific Specialty
Boards (CESB)

Dental Assisting National
Board (DANB)

Design-Build Institute of
America (DBIA)

Diving Equipment and
Marketing Association
(DEMA)

Entertainment Services and
Technology Association
(ESTA)

ETA International (ETA)

Events Industry Council
(EIC)

Financial Planning
Association (FPA)

Hearth, Patio, & Barbecue
Education Foundation

Heuristic Solutions

Hospice and Palliative
Credentialing Center
(HPCC)

Institute for Credentialing
Excellence (ICE)

Institute of Certified
Management Accountants
(ICMA)

Institute of Hazardous
Materials Management
(IHMM)

Institute of Internal
Auditors (IIA)

Inteleos (includes the
American Registry for
Diagnostic Medical
Sonography (ARDMS) and
the Alliance for Physician
Certification &
Advancement (APCA))

Irrigation Association

International Association
of Healthcare Central
Service Materiel
Management (IAHCSMM)

International Association
of Lighting Designers
(IALD)

International Certification
& Reciprocity Consortium
(IC&RC)

International Coach
Federation (ICF)

International Foundation
for Retirement Education
(InFRE)

International Society of
Automation (ISA)

Institute of Real Estate
Management (IREM)

International Information
System Security
Certification Consortium
(ISC²)

IT Certification Council
(ITCC)

Laborers' International
Union of North America
Training & Education
Fund (LIUNA)

Medical-Surgical Nursing
Certification Board
(MSNCB)

National Association of
Legal Assistants, Inc.
(NALA)

National Association of
Insurance and Financial
Advisors (NAIFA)

National Association of
Personal Financial
Advisors (NAPFA)

National Athletic Trainers'
Association Board of
Certification, Inc. (NATA)

National Board of
Certification and
Recertification for Nurse
Anesthetists (NBCRNA)

National Board of
Certification in Hearing
Instrument Sciences
(NBC-HIS)

National Kitchen and Bath
Association (NKBA)

National Board of
Certification in
Occupational Therapy
(NBCOT)

National Certification
Commission for

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Acupuncture and Oriental
Medicine (NCCAOM)

National Certification
Board for Diabetes
Educators (NCBDE)

National Certification
Corporation (NCC)

National Commission on
Certification of Physician
Assistants (NCCPA)

National Commission for
Health Education
Credentialing

National Council on
Family Relations (NCFR)

National Recreation and
Park Association (NRPA)

National Restaurant
Association (NRA)

National Roofing
Contractors Association
(NRCA)

National Society of
Professional Engineers
(NSPE)

Nephrology Nursing
Certification Commission

Oncology Nursing
Certification Corporation

Professional Association of
Therapeutic Horsemanship
International (PATH)

Pediatric Nursing
Certification Board
(PNCB)

Pharmacy Technician
Certification Board
(PTCB)

PSI Services

Pearson Vue

QualityPro

School Nutrition
Association (SNA)

SeaCrest Consulting

Security Industry
Association

Society of Broadcast
Engineers (SBE)

Specialty Pharmacy
Certification Board
(SPCB)

Spray Polyurethane Foam
Alliance (SPFA)

Towing and Recovery
Association of America,
Inc. (TRA)