



PROFESSIONAL
CERTIFICATION
COALITION

March 17, 2021

Senator Ogden Driskill, *Chair*
Joint Committee on Corporations, Elections
and Political Subdivisions
200 West 24th Street
State Capitol
Cheyenne, WY 82002
ogden.driskill@wyoleg.gov

Representative Daniel Zwonitzer, *Chair*
Joint Committee on Corporations, Elections
and Political Subdivisions
2120 Capitol Avenue
Federal Center, Suite 2007
Cheyenne, WY 82001
dan.zwonitzer@wyoleg.gov

Re: S.F. 15

Dear Senator Driskill and Rep. Zwonitzer:

The Professional Certification Coalition (PCC) writes regarding the potential harmful effects of S.F. 15 on important protections for the public. While the PCC recognizes that emergency measures may be warranted during the pandemic, we urge amendments to S.F. 15 to ensure that, once the COVID-19 public health emergency is behind us, safeguards to the public and occupational licensure standards are restored.

The PCC is a nonprofit association formed to address legislative initiatives that affect 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

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as a substitute for a licensing board for a profession for which licensure is required to protect public health, safety, or welfare.

In response to the COVID-19 pandemic, S.F. 15 would permit professional and occupational boards to waive or modify statutory examinations for licensure. While the bill is structured to respond to emergency conditions, it lacks assurances that such waivers are in fact temporary and will not lead to a permanent removal of requirements that ensure licensed professionals demonstrate that they have the qualifications to practice competently and safely. In addition, we request that the legislation clarify that the emergency exceptions apply to state authorization to practice, and that the bill does not intrude on the right of non-governmental certification organizations to enforce their eligibility standards. Therefore, the PCC proposes the following amendments:

- Amend subsection (b) to add a sentence after (b)(iii): **“Any such waiver or modification shall be temporary, and shall require, as a condition of continued licensure or permission, that the licensed or permitted individual satisfy the examination, continuing education, or other statutory requirement within a reasonable time period, to be specified by the board, once the opportunity to satisfy those requirements is again available.”**
- Add a safe harbor provision: **“Nothing in this section shall be construed to require a private certification organization to grant or deny private certification to any individual, nor alter or impair 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 after the temporary waiver or modification period has passed.”**

Especially during the COVID-19 pandemic, the PCC supports efforts to remove unnecessary barriers to entry into professions. We respectfully request, however, that you and your colleagues in the legislature amend the bill as we have requested above to avoid stripping important protections from the public.

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)

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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 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

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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)