



PROFESSIONAL  
CERTIFICATION  
COALITION

March 25, 2021

Rep. Robert Kaufmann, *Chair*  
House Committee on State Government  
1007 East Grand Avenue  
State Capitol  
Des Moines, IA 50319  
[bobby.kaufmann@legis.iowa.gov](mailto:bobby.kaufmann@legis.iowa.gov)

Rep. Brooke Boden, *Vice Chair*  
House Committee on State Government  
1007 East Grand Avenue  
State Capitol  
Des Moines, IA 50319  
[brooke.boden@legis.iowa.gov](mailto:brooke.boden@legis.iowa.gov)

**Re: S.F. 487**

Dear Representatives Kaufmann and Boden:

The Professional Certification Coalition (PCC) writes regarding S.F. 487 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 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. As subject matter experts, private certification organizations are in the best position to develop and define the *content* of the standards that certificants must demonstrate to earn a recognized credential in their field. 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. For these professions, *enforcement* of competency and conduct standards is more effectively done by the licensing agency. In professions for which state licensing boards have historically provided oversight, it would not serve the public interest to eliminate or weaken licensure requirements 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. We appreciate that S.F. 487 has been drafted to include provisions designed to avoid intruding on the credentialing decisions of private certification organizations. For example, the bill avoids setting up the government as a competitor to private

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certification, if existing private certifications are available, and it expressly does not restrict licensure agencies from requiring private certification as a condition of licensure.

The PCC proposes the following amendments to ensure the bill's protection of the public and the certification community:

- All references to “public health or safety” should be amended to recognize “public health, safety, **or welfare**” as legitimate bases for regulatory requirements. Without this change, regulators could not retain occupational regulations designed to protect Iowa citizens from fraud, property damage, identity theft, etc., as those relate to public welfare but not to health or safety.
- for a similar reason, amend “present, significant and substantiated harms that threaten public health or safety” to “**significant, and substantiated or recognized imminent harms that threaten public health, and safety, or welfare.**”
- The definition of certification should be amended to define certification in a way that screens out organizations that sell credentials without substance. The amended definition would read: “a voluntary program in which a private organization or the state grants nontransferable recognition to an individual who meets personal qualifications **relevant to performance of the occupation to which the certification pertains, including by demonstrating a specified level of knowledge, competency, or skill required to meet standards in the profession, as established by state law or by a private organization that issues credentials that are widely recognized in the field.**”
- To avoid having the legislation lead to elimination of occupational regulation that is widely recognized as necessary to protect the public, add “**Notwithstanding other provisions in this chapter, the state may regulate a profession or occupation and impose licensure requirements for practice of that occupation if the licensure requirements are based on uniform national laws, practices, and/or examinations that have been adopted by at least two-thirds of states and territories in the United States.**”

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,



Craig Saperstein  
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Legal Counsel to the PCC  
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CC:

Sen. Waylon Brown  
[waylon.brown@legis.iowa.gov](mailto:waylon.brown@legis.iowa.gov)

Rep. Jane E. Bloomingdale  
[jane.bloomingdale@legis.iowa.gov](mailto:jane.bloomingdale@legis.iowa.gov)

Rep. Carter Nordman  
[Carter.Nordman@legis.iowa.gov](mailto:Carter.Nordman@legis.iowa.gov)

Rep. Mary Lynn Wolfe  
[mary.wolfe@legis.iowa.gov](mailto:mary.wolfe@legis.iowa.gov)

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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

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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 (ISC<sup>2</sup>)

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

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)