



PROFESSIONAL
CERTIFICATION
COALITION

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**Public Hearing Testimony for the Professional Certification Coalition
L.D. 149, An Act To Facilitate Licensure for Credentialed Individuals from Other
Jurisdictions**

Senator Curry, Representative Roberts, and distinguished members of the committee:

The Professional Certification Coalition (PCC) writes regarding L.D. 149, which provides for licensing reciprocity.

The PCC is a nonprofit association founded in 2018 to address legislation and regulation that affects 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's organizational members include non-governmental professional certification organizations, professional societies, and service providers, and reflect a wide spectrum of professions, including health care, professional and civil 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) – serve as the Steering Committee for the PCC.

The PCC supports reducing unnecessary barriers for licensed professionals who move to a new state, provided that any alternative pathways protect the public from unqualified or unethical practitioners and uphold the integrity of licensed professions as a whole. The PCC supports L.D. 149's approach and commends the bill for limiting reciprocal licensure to situations in which the applicant's out-of-state license reflects substantially equivalent license requirements for the occupation as Maine has adopted. The bill also provides discretion to Maine agencies to waive documentation requirements only if "the requisite standards of proficiency for the licensed profession or occupation" are not reduced, so the discretion granted is bounded in a way that protects Maine's substantive requirements.

The PCC has developed the attached [Statement of Principles](#) and respectfully requests that the legislature ensure that any amendments to the provisions of LD 149 are consistent with the following six principles:

- 1. Require further profession-specific action by licensing agencies, rather than automatically providing sweeping recognition of all out-of-state licenses.**
- 2. Require the licensing agency/board to make an initial assessment of whether licenses in other jurisdictions are, in fact, equivalent in standards and scope of practice.**

3. **Permit reciprocal licensure as a general matter only if there is substantial similarity between the requirements, knowledge, and scope of practice for two jurisdictions.**
4. **Condition reciprocity on joint oversight of the licensee, as well as communication and mandatory reporting between the in-state and out-of-state licensing agencies.**
5. **Grant alternative pathways to licensure for unlicensed out-of-state applicants only if the applicant demonstrates at least substantially equivalent educational, training, examination, credentials, and experience as are required of in-state applicants.**
6. **Consider whether residency requirements are warranted to qualify for reciprocal licensure.**

The PCC members view these principles as important both to protect the public and because reciprocity bills directly affect PCC members that credential professionals in regulated occupations, such as health care. In many of these occupations, licensure statutes and regulations make certification by recognized private certification organizations a condition of licensure. If, due to variations in licensing laws, reciprocal licensure allows unqualified or unfit individuals to practice, the public's trust in such certified professionals and their respective regulated professions will be irreparably damaged, especially for occupations in which the public conflates certification status with licensure.

Further, even PCC members that issue certifications to individuals in fields that do not require licensure have an interest in this issue. Certification organizations – and professional societies that represent individuals who hold certification credentials – rely on the role of licensing agencies to protect the public. By their nature, they are also interested in upholding professional standards for knowledge, skills, conduct, and qualifications. If reciprocal licensure laws create loopholes that weaken how state licensing agencies enforce such standards, this is a matter of great concern to the certification community.

Thank you for your attention to these issues and consideration of the PCC's views.

Sincerely,



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Current List of PCC Members

1. ABRET Neurodiagnostic Credentialing & Accreditation (ABRET)
2. ABSA International: the Association for Biosafety and Biosecurity (ABSA)
3. Academy of Nutrition and Dietetics (AND)
4. Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP)
5. Alliance of Hazardous Materials Professionals
6. American Association of Post-Acute Care Nurses (AAPACN)
7. American Association of Critical-Care Nurses (AACN)
8. American Association of Neuromuscular & Electromyography Medicine (AANEM)
9. American Association of Professional Landmen
10. American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABCOP)
11. American Board of Certification for Gastroenterology Nurses (ABCGN)
12. American Board of Neuroscience Nursing (ABNN)
13. American Board of Post-Acute and Long-Term Care Medicine (ABPLM)
14. American Board of Foot and Ankle Surgery (ABFAS)
15. American Board of Wound Management (ABWM)
16. American Industrial Hygiene Association (AIHA)
17. American Medical Certification Association (AMCA)
18. American Nurses Credentialing Center (ANCC)
19. American Payroll Association (APA)
20. American Society of Association Executives (ASAE)
21. American Society of Civil Engineers (ASCE)
22. American Speech-Language-Hearing Association (ASHA)
23. American Traffic Safety Services Association (ATSSA)
24. American Translators Association (ATA)
25. American Veterinary Medical Association (AVMA)
26. Association for Financial Counseling & Planning Education (AFCPE)
27. Association for Financial Professionals (AFP)
28. Association of Surgical Technologists (AST)
29. Behavior Analyst Certification Board (BACB)
30. *Building Industry Consulting Service International (BICSI)*
31. Board of Certification/Accreditation (BOC)
32. Board of Certified Safety Professionals (BCSP)
33. Board of Pharmacy Specialties (BPS)
34. Building Commissioning Certification Board (BCCB)
35. CCIM Institute (issues the Certified Commercial Investment Member designation)
36. CFA Institute
37. Certification Board for Music Therapists (CBMT)
38. Certification Board of Infection Control and Epidemiology (CBIC)
39. Certification Council for Professional Dog Trainers
40. Certified Financial Planner Board of Standards (CFP)
41. Certified Fund Raising Executive International (CFRE)
42. Commercial Real Estate Certification Institute
43. Commission for Case Manager Certification (CCMC)
44. Commission on Nurse Certification (CNC)
45. CompTIA
46. Community Association Institute (CAI)
47. Construction Management Association of America (CMAA)
48. Council of Engineering and Scientific Specialty Boards (CESB)
49. Dental Assisting National Board (DANB)
50. Diving Equipment and Marketing Association (DEMA)
51. Entertainment Services and Technology Association (ESTA)
52. ETA International (ETA)
53. Events Industry Council (EIC)
54. Financial Planning Association (FPA)
55. Hearth, Patio, & Barbecue Education Foundation
56. Heuristic Solutions
57. Hospice and Palliative Credentialing Center (HPCC)

58. Institute for Credentialing Excellence (ICE)
59. Institute of Certified Management Accountants (ICMA)
60. Institute of Hazardous Materials Management (IHMM)
61. Institute of Internal Auditors (IIA)
62. Inteleos (includes the American Registry for Diagnostic Medical Sonography (ARDMS) and the Alliance for Physician Certification & Advancement (APCA))
63. Irrigation Association
64. International Association of Healthcare Central Service Materiel Management (IAHCSMM)
65. International Association of Lighting Designers (IALD)
66. International Coach Federation (ICF)
67. International Foundation for Retirement Education (InFRE)
68. International Society of Automation (ISA)
69. Institute of Real Estate Management (IREM)
70. International Information System Security Certification Consortium (ISC²)
71. IT Certification Council (ITCC)
72. Laborers' International Union of North America Training & Education Fund (LIUNA)
73. Medical-Surgical Nursing Certification Board (MSNCB)
74. National Association of Legal Assistants, Inc. (NALA)
75. National Association of Insurance and Financial Advisors (NAIFA)
76. National Association of Personal Financial Advisors (NAPFA)
77. National Athletic Trainers' Association Board of Certification, Inc. (BOC)
78. National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA)
79. National Board of Certification in Hearing Instrument Sciences (NBC-HIS)
80. National Kitchen and Bath Association (NKBA)
81. National Board of Certification in Occupational Therapy (NBCOT)
82. National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)
83. Certification Board for Diabetes Care and Education (CBDCE)
84. National Certification Corporation (NCC)
85. National Commission on Certification of Physician Assistants (NCCPA)
86. National Commission for Health Education Credentialing
87. National Council on Family Relations (NCFR)
88. National Recreation and Park Association (NRPA)
89. National Restaurant Association (NRA)
90. National Roofing Contractors Association (NRCA)
91. National Society of Professional Engineers (NSPE)
92. Nephrology Nursing Certification Commission
93. Oncology Nursing Certification Corporation
94. Professional Association of Therapeutic Horsemanship International (PATH)
95. Pediatric Nursing Certification Board (PNCB)
96. Pharmacy Technician Certification Board (PTCB)
97. PSI Services
98. Pearson Vue
99. QualityPro
100. School Nutrition Association (SNA)
101. SeaCrest Consulting
102. Security Industry Association
103. Society of Broadcast Engineers (SBE)
104. Specialty Pharmacy Certification Board (SPCB)
105. Spray Polyurethane Foam Alliance (SPFA)
106. Towing and Recovery Association of America, Inc. (TRA)