



PROFESSIONAL  
CERTIFICATION  
COALITION

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**Public Hearing Testimony for the Professional Certification Coalition  
L.D. 612, An Act To Recognize Occupational Licenses and Certifications from  
Other States To Attract New Residents and Businesses to Maine**

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

The Professional Certification Coalition (PCC) writes regarding L.D. 612, which provides for licensing reciprocity and alternative paths to licensure based on work experience and/or private credentials. The PCC urges amendments to L.D. 612 to ensure that Maine residents can rely on occupational licensing agencies to protect against granting licenses to unqualified individuals.

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.

The PCC supports reducing unnecessary barriers for licensed professionals who move to a new state. However, as noted in the attached [Statement of Principles](#), not all state-specific requirements are unwarranted: substantive state-specific licensing requirements protect the public from unqualified or unethical practitioners and uphold the integrity of licensed professions as a whole. The PCC commends the bill for recognizing that not all licenses are the same, limiting reciprocity for individuals licensed or certified by another state to circumstances in which the qualifications for the out-of-state license or government certification are “substantially similar” to Maine’s requirements.

As currently drafted, however, the bill omits any similar safeguards from its provisions creating alternative pathways for unlicensed individuals relocating to Maine. Not all privately issued credentials or work experience provide assurances of competency or qualifications equivalent to Maine’s licensing laws. For example, Maine requires funeral practitioners to be licensed; applicants must, among other requirements, have completed an accredited mortuary science or funeral service program and have passed the National Board Arts and Sciences Examinations. Colorado, unlike almost every other state, has no licensure requirements for funeral practitioners. As currently drafted, the bill would grant licensure to relocating Colorado residents without such training and demonstrated competencies, based only on their years of work experience in the funeral industry, however dismal that work record may be. In 2019, the Maine legislature enacted a law providing for reciprocal licensure for funeral practitioners who are licensed in other states with “substantially similar” licensure requirements – supporting mobility of professionals considering relocating to Maine, without watering down Maine’s substantive licensure requirements. L.D. 612 would override those important consumer protections for Maine residents.

The same considerations apply to other licensed professions. Accordingly, the PCC urges the legislature to amend L.D. 612 to ensure that the standards for Maine licensure are maintained. Specifically, the PCC proposes an amendment to Section 18604 and 18605 to add a new Section 18604(4) and 18604(6) setting a floor for what unlicensed individuals must show to earn licensure based on work experience or private certifications: **“Equivalent standards. The person demonstrates at least substantially equivalent educational, training, examination, credentials, and experience to that required for Maine licensees in the occupation, as determined by the occupational board.”**

Just as prior work experience is not a substitute for examination-based or certification credentials, as it does not establish competency or skill, not all private certifications are equivalent. Our proposed amendments would require unlicensed out-of-state applicants to demonstrate substantive qualifications that are at least comparable to those required of in-state applicants and would avoid bogus or flimsy certification programs being used as a substitute for licensure. At the same time, for licensed occupations that condition licensure on obtaining and maintaining private certification, accepting that certification from out-of-state applicants can provide an alternative pathway to universal licensure that still safeguards Maine residents from unqualified practitioners.

L.D. 612 directly affects both protections for the public and PCC members that credential professionals in regulated occupations, such as health care, in which certification by recognized private certification organizations is 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. 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

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 & Electrodiagnostic 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 (ISC<sup>2</sup>)
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)