



PROFESSIONAL
CERTIFICATION
COALITION

August 15, 2022

Rep. David Martin
124 North Capitol Avenue
Cora B. Anderson House Office Building, Room N-897
Lansing, MI 48933
davidmartin@house.mi.gov

Re: H.B. 6284

Dear Rep. Martin:

The Professional Certification Coalition (PCC) writes regarding H.B. 6284, which provides for licensing reciprocity for military members and their dependents. The PCC urges amendments to H.B. 6284 to ensure that residents can rely on Michigan's occupational licensing agencies to protect against occupational practice by 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. Our 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, especially for military members and their families. However, 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. H.B. 6284 tips the balance too far in favor of lenient licensing and goes beyond the streamlining warranted to accommodate service members and their dependents who may be affected by relocation orders.

The PCC urges the legislature to amend H.B. 6284 as necessary to reflect these concerns and the attached [Statement of Principles](#). Specifically, the PCC proposes several amendments to H.B. 6284:

- The bill would weaken the competency safeguards on reciprocity by removing “the requirements for licensure or registration in the other state are substantially similar to or exceed the requirements” for Michigan applicants, and applying this weakened standard not only to military service members and their dependents, and but also to individuals with no connection to the military or who left military service years ago . **Amend to keep this standard in Sections 217(1)(b)(i) and (iv) and to amend Section 218(1)(a)(ii) to read:** “There were minimum education requirements and, if applicable, work experience requirements in effect for licensure or registration in the other state, **and those requirements were substantially equivalent or more stringent to that required for Michigan licensees in the occupation, as determined by the department,** and the other state verifies that he or she met those requirements for licensure or registration in the other state.”

- Removing the requirement for military reciprocity for at least one year of licensure also undermines evidence of competency but is less objectionable for those affected by displacements due to military orders. That consideration does not apply to veterans, however. As applied to them, this provision is a lifelong exemption from otherwise applicable standards. **Amend to remove veterans from this provision or to limit it only to recently separated veterans discharged within the prior one-year period.**

This bill directly affects protections for the public and also 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. Certification organizations exist to establish standards of knowledge and skill for a profession, and to assure the public that certified individuals have demonstrated that they are qualified to practice their professions competently and safely. If, due to variations in licensing laws, alternative pathways to licensure allow unqualified or unfit individuals to practice, the public's trust in certified professionals and their regulated professions will be irreparably damaged, especially for occupations in which the public conflates certification status with licensure.

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. Please feel free to contact us using our contact information below if you would like to discuss this further.

Sincerely,



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Current List of PCC Members

AABC Commissioning Group	American Traffic Safety Services Association (ATSSA)	Community Association Institute (CAI)
ABRET Neurodiagnostic Credentialing & Accreditation (ABRET)	American Translators Association (ATA)	Computing Technology Industry Association (CompTIA)
ABSA International: the Association for Biosafety and Biosecurity (ABSA)	American Veterinary Medical Association (AVMA)	Construction Management Association of America (CMAA)
Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP)	Arcitura Education, Inc.	Council for Interior Design Qualification (CIDQ)
American Association of Professional Landmen (AAPL)	Association for Financial Counseling & Planning Education (AFCPE)	Council of Engineering and Scientific Specialty Boards (CESB)
American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABCOP)	Association of Surgical Technologists (AST)	Dental Assisting National Board (DANB)
American Board of Certification for Gastroenterology Nurses (ABCGN)	Behavior Analyst Certification Board (BACB)	Diving Equipment and Marketing Association (DEMA)
American Board of Foot and Ankle Surgery (ABFAS)	Board of Certification/Accreditation (BOC)	Entertainment Services and Technology Association (ESTA)
American Board of Medical Specialties (ABMS)	Board of Certified Safety Professionals (BCSP)	ETA International
American Board of Neuroscience Nursing (ABNN)	Board of Pharmacy Specialties (BPS)	Financial Planning Association (FPA)
American Board of Nursing Specialties (ABNS)	Building Commissioning Certification Board (BCCB)	Healthcare Sterile Processing Association (HSPA)
American Board of Wound Management (ABWM)	Certification Board for Diabetes Care and Education (CBDCE)	Hearth, Patio, & Barbecue Education Foundation (HPBA)
American Industrial Hygiene Association (AIHA)	Certification Board for Music Therapists (CBMT)	Heuristic Solutions
American Legal Nurse Consultant Certification Board (ALNCCB)	Certification Board of Infection Control and Epidemiology (CBIC)	Hospice and Palliative Credentialing Center (HPCC)
American Medical Certification Association (AMCA)	Certification Council for Professional Dog Trainers (CCPDT)	Institute for Credentialing Excellence (ICE)
American Nurses Credentialing Center (ANCC)	Certified Financial Planner Board of Standards (CFP)	Institute of Hazardous Materials Management (IHMM)
American Payroll Association (APA)	Certified Fund Raising Executive International (CFRE)	Institute of Inspection Cleaning and Restoration Certification (IICRC)
American Society of Association Executives (ASAE)	CertiProf, LLC	Institute of Internal Auditors (IIA)
American Society of Civil Engineers (ASCE)	Chartered Financial Analyst Institute (CFA)	International Coach Federation (ICF)
American Speech-Language-Hearing Association (ASHA)	Commission for Case Manager Certification (CCMC)	International Foundation for Retirement Education (InFRE)
	Commission on Nurse Certification (CNC)	International Information System Security Certification Consortium (ISC ²)
		Investments & Wealth Institute (IWI)

Irrigation Association

IT Certification Council (ITCC)

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

Medical-Surgical Nursing
Certification Board (MSNCB)

National Association of Insurance
and Financial Advisors (NAIFA)

National Association of Personal
Financial Advisors (NAPFA)

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

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Hearing Instrument Sciences
(NBC-HIS)

National Board of Certification in
Occupational Therapy (NBCOT)

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Technology and Surgical Assisting
(NBSTSA)

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Certification of Physician
Assistants (NCCPA)

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National Council on Family
Relations (NCFR)

National Healthcareer Association
(NHA)

National Kitchen and Bath
Association (NKBA)

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 (NNCC)

Oncology Nursing Certification
Corporation (ONCC)

Pediatric Nursing Certification
Board (PNCB)

Pharmacy Technician Certification
Board (PTCB)

Professional Association of
Therapeutic Horsemanship
International (PATH)

PSI Services

Pearson Vue

QualityPro

Rehabilitation Nursing
Certification Board (RNCB)

School Nutrition Association
(SNA)

SeaCrest Consulting

Security Industry Association
(SIA)

Society of Broadcast Engineers
(SBE)

Specialty Pharmacy Certification
Board (SPCB) c/o National
Association of Specialty Pharmacy
Certification Board

Spray Polyurethane Foam Alliance
(SPFA)

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