



PROFESSIONAL
CERTIFICATION
COALITION

August 15, 2022

Asm. Marilyn Piperno
PO Box 98
Trenton, NJ
08625-0098
aswpiperno@njleg.org

Re: A. 4390

Asm. Kimberly Eulner
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Dear Assemblymembers Piperno and Eulner:

The Professional Certification Coalition (PCC) writes regarding A. 4390, which provides for licensing reciprocity for military veterans. The PCC urges an amendment to A. 4390 to ensure that residents can rely on New Jersey'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. 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. A. 4390 tips the balance too far in favor of lenient licensing and goes beyond the streamlining warranted to accommodate service members who are reentering the civilian workforce.

The PCC urges the legislature to amend A. 4390 as necessary to reflect these concerns and the attached [Statement of Principles](#).

Specifically, the PCC proposes several amendments to A. 4390:

- The rationale for this bill appears to be to provide a streamlined path to licensure for veterans who obtained experience and expertise during their military training. There is not the same justification to apply this to veterans who may be entering a new career years after their military service. Amend Section 1(a) to apply the bill's reduced requirements for licensing to "an applicant with a license and equivalent training, education, and experience received while serving or **in part** after serving as a member of the Armed Forces of the United States, **provided that at least some** of the license,

training, education, or experience **on which the applicant relies in the applicant's application** was obtained during the applicant's service with the armed forces.”

- Amend Section 1(b) to add an additional qualification (4): **“the applicant demonstrates at least substantially equivalent educational, training, examination, credential, and experience as are required of New Jersey licensees in the occupation, as determined by the board.”**

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](#)



PROFESSIONAL CERTIFICATION COALITION

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

International Information System Security Certification Consortium (ISC²)

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)

National Athletic Trainers' Association Board of Certification, Inc. (NATA/BOC)

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

National Board of Certification in Hearing Instrument Sciences (NBC-HIS)

National Board of Certification in Occupational Therapy (NBCOT)

National Board of Surgical Technology and Surgical Assisting (NBSTSA)

National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)

National Certification Corporation (NCC)

National Commission on Certification of Physician Assistants (NCCPA)

National Commission for Health Education Credentialing (NCHEC)

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)