



PROFESSIONAL  
CERTIFICATION  
COALITION

August 15, 2022

Sen. Vincent Polistina  
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[senpolistina@njleg.org](mailto:senpolistina@njleg.org)

**Re: S. 2882**

Dear Senator Polistina:

The Professional Certification Coalition (PCC) writes regarding S. 2882, which provides for licensing reciprocity for military veterans. The PCC urges an amendment to S. 2882 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. S. 2882 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 S. 2882 as necessary to reflect these concerns and the attached [Statement of Principles](#).

Specifically, the PCC proposes several amendments to S. 2882:

- 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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CC:

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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 <sup>2</sup> )
		Investments & Wealth Institute (IWI)

Irrigation Association	National Commission on Certification of Physician Assistants (NCCPA)	PSI Services
IT Certification Council (ITCC)	National Commission for Health Education Credentialing (NCHEC)	Pearson Vue
Laborers' International Union of North America Training & Education Fund (LIUNA)	National Council on Family Relations (NCFR)	QualityPro
Medical-Surgical Nursing Certification Board (MSNCB)	National Healthcareer Association (NHA)	Rehabilitation Nursing Certification Board (RNCB)
National Association of Insurance and Financial Advisors (NAIFA)	National Kitchen and Bath Association (NKBA)	School Nutrition Association (SNA)
National Association of Personal Financial Advisors (NAPFA)	National Recreation and Park Association (NRPA)	SeaCrest Consulting
National Athletic Trainers' Association Board of Certification, Inc. (NATA/BOC)	National Restaurant Association (NRA)	Security Industry Association (SIA)
National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA)	National Roofing Contractors Association (NRCA)	Society of Broadcast Engineers (SBE)
National Board of Certification in Hearing Instrument Sciences (NBC-HIS)	National Society of Professional Engineers (NSPE)	Specialty Pharmacy Certification Board (SPCB) c/o National Association of Specialty Pharmacy Certification Board
National Board of Certification in Occupational Therapy (NBCOT)	Nephrology Nursing Certification Commission (NNCC)	Spray Polyurethane Foam Alliance (SPFA)
National Board of Surgical Technology and Surgical Assisting (NBSTSA)	Oncology Nursing Certification Corporation (ONCC)	Towing and Recovery Association of America, Inc. (TRA)
National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)	Pediatric Nursing Certification Board (PNCB)	
National Certification Corporation (NCC)	Pharmacy Technician Certification Board (PTCB)	
	Professional Association of Therapeutic Horsemanship International (PATH)	