



PROFESSIONAL
CERTIFICATION
COALITION

November 21, 2022

Rep. Scott Wiggam, *Chair*
House State and Local Government Committee
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Rep. Marilyn John, *Vice Chair*
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Re: S.B. 131

Dear Representatives Wiggam and John:

The Professional Certification Coalition (PCC) writes regarding S.B. 131, which provides for licensing reciprocity and alternative paths to licensure based on private credentials. The PCC urges amendments to S.B. 131 to ensure that Ohio does not become a “race-to-the-bottom” state for professional qualifications and so out-of-state applicants for licensure are not held to lower standards than Ohio expects of its own residents.

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. 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 and limiting reciprocity for individuals licensed by another state to circumstances in which the out-of-state license is “substantially similar” to Ohio’s license.

As currently drafted, the bill omits crucial safeguards from its provisions creating alternative pathways for licensed and unlicensed individuals relocating to Ohio. The bill would authorize licenses for out-of-state individuals who lack the minimum qualifications that Ohio licensees must hold – but Ohio consumers hiring them would have no way to know that an individual licensee had been exempted from those qualification requirements by relocating to Ohio from a different state.

Because not all privately issued credentials or work experience can provide assurances of competency or qualifications equivalent to Ohio’s licensing laws, the PCC urges amendments to S.B. 131 to ensure that the standards for Ohio licensure are maintained.

Specifically, the PCC proposes the following amendments:

- Amend Sec. 4796.03(D)(1) to read: “Except as provided in division (D)(2) of this section, the applicant was required to satisfy minimum education, training, or experience requirements or pass an examination to receive the out-of-state occupational license or government certification, **and such requirements are substantially equivalent or more stringent than the educational, training, examination, credentials, and experience required of Ohio residents authorized to practice in this state.**”
- Amend Sec. 4796.04 to include a new requirement (D): “**The applicant demonstrates at least substantially equivalent educational, training, examination, credential, and experience as are required of Ohio licensees in the occupation, as determined by the licensing authority.**”

By creating an alternative path to licensure based on a certification held by an out-of-state applicant based on whether the applicant holds any private certification, the bill ignores that private certifications are not all 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.

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. 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

AABC Commissioning Group	American Medical Certification Association (AMCA)	Building Commissioning Certification Board (BCCB)
ABRET Neurodiagnostic Credentialing & Accreditation (ABRET)	American Nurses Credentialing Center (ANCC)	Certification Board for Diabetes Care and Education (CBDCE)
ABSA International: the Association for Biosafety and Biosecurity (ABSA)	American Payroll Association (APA)	Certification Board for Music Therapists (CBMT)
Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP)	American Society of Association Executives (ASAE)	Certification Board of Infection Control and Epidemiology (CBIC)
American Association of Professional Landmen (AAPL)	American Society of Civil Engineers (ASCE)	Certification Council for Professional Dog Trainers (CCPDT)
American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABCOP)	American Speech-Language-Hearing Association (ASHA)	Certified Financial Planner Board of Standards (CFP)
American Board of Certification for Gastroenterology Nurses (ABCGN)	American Traffic Safety Services Association (ATSSA)	Certified Fund Raising Executive International (CFRE)
American Board of Foot and Ankle Surgery (ABFAS)	American Translators Association (ATA)	CertiProf, LLC
American Board of Medical Specialties (ABMS)	Arcitura Education, Inc.	Chartered Financial Analyst Institute (CFA)
American Board of Neuroscience Nursing (ABNN)	Association for Financial Counseling & Planning Education (AFCPE)	Commission for Case Manager Certification (CCMC)
American Board of Nursing Specialties (ABNS)	Association of Surgical Technologists (AST)	Commission on Nurse Certification (CNC)
American Board of Wound Management (ABWM)	Behavior Analyst Certification Board (BACB)	Community Association Institute (CAI)
American Industrial Hygiene Association (AIHA)	Board of Certification/Accreditation (BOC)	Computing Technology Industry Association (CompTIA)
American Legal Nurse Consultant Certification Board (ALNCCB)	Board of Certified Safety Professionals (BCSP)	Construction Management Association of America (CMAA)
	Board of Pharmacy Specialties (BPS)	Council for Interior Design Qualification (CIDQ)

Council of Engineering and Scientific Specialty Boards (CESB)

Dental Assisting National Board (DANB)

Diving Equipment and Marketing Association (DEMA)

Entertainment Services and Technology Association (ESTA)

ETA International

Financial Planning Association (FPA)

Healthcare Sterile Processing Association (HSPA)

Hearth, Patio, & Barbecue Education Foundation (HPBA)

Heuristic Solutions

Hospice and Palliative Credentialing Center (HPCC)

Institute for Credentialing Excellence (ICE)

Institute of Hazardous Materials Management (IHMM)

Institute of Inspection Cleaning and Restoration Certification (IICRC)

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

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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)

National Board of Public Health Examiners (NBPHE)