



PROFESSIONAL
CERTIFICATION
COALITION

November 21, 2022

Sen. Terry A. Johnson, *Chair*
Senate Comm. on Workforce and Higher Education
One Capitol Square, Senate Building, Second Floor
Columbus, OH 43215
sd14@ohiosenate.gov

Sen. Jerry Cirino, *Vice Chair*
Senate Comm. on Workforce and Higher Education
One Capitol Square, Senate Building, First Floor
Columbus, OH 43215
cirino@ohiosenate.gov

Re: H.B. 203

Dear Senators Johnson and Cirino:

The Professional Certification Coalition (PCC) writes regarding H.B. 203, which provides for licensing reciprocity and alternative paths to licensure based on private credentials. The PCC urges amendments to H.B. 203 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.

As currently drafted, the bill omits crucial safeguards from its provisions creating alternative pathways for licensed and unlicensed individuals relocating to Ohio. 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 H.B. 203 to ensure that the standards for Ohio licensure are maintained. 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.

Specifically, the PCC proposes the following amendments:

- Amend Sec. 4796.03(A)(1) to read (as provided in S.B. 131): “A **substantially similar** out-of-state occupational license that authorizes the applicant to engage in the same profession, occupation, or occupational activity, and at the same practice level, as the license or government certification for which the applicant is applying in this state.”
- Amend Sec. 4796.03(D) to read: “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,



Jeff Evans
Director, Public Policy
ASAE: The Center for Association Leadership
Phone: (202) 626-2722
Email: jevans@asaecenter.org



Denise Roosendaal, FASAE, CAE
Executive Director
Institute for Credentialing Excellence
Phone: (202) 367-1165
Email: droosendaal@credentialingexcellence.org

CC:

Rep. Jena Powell
rep80@ohiohouse.gov

Rep. William Dean
rep74@ohiohouse.gov

Rep. Sarah Fowler Arthur
rep99@ohiohouse.gov

Rep. Jennifer Gross
rep52@ohiohouse.gov

Rep. Kris Jordan
rep67@ohiohouse.gov

Rep. Darrell Kick
rep70@ohiohouse.gov

Rep. Scott Lipps
rep62@ohiohouse.gov

Rep. Riordan McClain
rep87@ohiohouse.gov

Rep. Derek Merrin
rep47@ohiohouse.gov

Rep. Craig Riedel
rep82@ohiohouse.gov

Rep. Paul Zeltwanger
rep54@ohiohouse.gov

Rep. Gary Click
rep88@ohiohouse.gov

Rep. Ron Ferguson
rep96@ohiohouse.gov

Rep. Thomas Hall
rep53@ohiohouse.gov

Rep. Adam Holmes
rep97@ohiohouse.gov

Rep. Shawn Stevens
rep68@ohiohouse.gov

Rep. Thomas West
rep49@ohiohouse.gov

Rep. Scott Wiggam
rep01@ohiohouse.gov

Current List of PCC Members

AABC Commissioning Group

ABRET Neurodiagnostic
Credentialing & Accreditation
(ABRET)

ABSA International: the
Association for Biosafety and
Biosecurity (ABSA)

Academy for Certification of
Vision Rehabilitation & Education
Professionals (ACVREP)

American Association of
Professional Landmen (AAPL)

American Board for Certification
in Orthotics, Prosthetics and
Pedorthics (ABCOP)

American Board of Certification
for Gastroenterology Nurses
(ABCGN)

American Board of Foot and
Ankle Surgery (ABFAS)

American Board of Medical
Specialties (ABMS)

American Board of Neuroscience
Nursing (ABNN)

American Board of Nursing
Specialties (ABNS)

American Board of Wound
Management (ABWM)

American Industrial Hygiene
Association (AIHA)

American Legal Nurse Consultant
Certification Board (ALNCCB)

American Medical Certification
Association (AMCA)

American Nurses Credentialing
Center (ANCC)

American Payroll Association
(APA)

American Society of Association
Executives (ASAE)

American Society of Civil
Engineers (ASCE)

American Speech-Language-
Hearing Association (ASHA)

American Traffic Safety Services
Association (ATSSA)

American Translators Association
(ATA)

Arcitura Education, Inc.

Association for Financial
Counseling & Planning Education
(AFCPE)

Association of Surgical
Technologists (AST)

Behavior Analyst Certification
Board (BACB)

Board of
Certification/Accreditation (BOC)

Board of Certified Safety
Professionals (BCSP)

Board of Pharmacy Specialties
(BPS)

Building Commissioning
Certification Board (BCCB)

Certification Board for Diabetes
Care and Education (CBDCE)

Certification Board for Music
Therapists (CBMT)

Certification Board of Infection
Control and Epidemiology (CBIC)

Certification Council for
Professional Dog Trainers
(CCPDT)

Certified Financial Planner Board
of Standards (CFP)

Certified Fund Raising Executive
International (CFRE)

CertiProf, LLC

Chartered Financial Analyst
Institute (CFA)

Commission for Case Manager
Certification (CCMC)

Commission on Nurse
Certification (CNC)

Community Association Institute
(CAI)

Computing Technology Industry
Association (CompTIA)

Construction Management
Association of America (CMAA)

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

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)

National Board of Public Health Examiners (NBPHE)