



PROFESSIONAL
CERTIFICATION
COALITION

January 24, 2023

Sen. Curtis Bramble
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Rep. Cory Maloy
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Re: S.B. 35

Dear Senator Bramble and Representative Maloy:

The Professional Certification Coalition (PCC) writes to share our views regarding S.B. 35, which provides for licensing reciprocity and for alternative pathways to Utah licensure for unlicensed individuals based on work experience. The PCC urges amendments to S.B. 35 to ensure that residents can rely on Utah'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. 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. Moreover, not all work experience can provide assurances of competency or qualifications that would be equivalent to the standards incorporated into Utah's licensing laws.

The PCC urges the legislature to amend S.B. 35 as necessary to reflect these concerns and the attached [Statement of Principles](#).

Specifically, the PCC proposes that Sections 4-1-112(2), 9-23-301.5(2), 13-1-17(2), 19-1-208(2), 26B-3-102(2), 35A-13-606.5(2), 40-2-403(2), 41-3-212(2), 53-1-122(2), 53E-6-205(2), 58-1-302(2), and 72-9-602.5(2) be amended to add a new requirement for pursuing an alternative pathway to licensure that **“the applicant has met substantially equivalent or more stringent minimum education requirements, work experience, apprenticeship requirements, clinical supervision, examination, and credential requirements than that required of Utah licensees**

in the occupation and that, if private certification is required as a condition of licensure in Utah, that the person currently holds that private certification.”

This bill directly affects protections for the public and also PCC members that confer credentials to 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 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: Sen. David G. Buxton, *Chair*
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Current List of PCC Members

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

Healthcare Sterile Processing Association (HSPA)	National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA)	Nephrology Nursing Certification Commission (NNCC)
Hearth, Patio, & Barbecue Education Foundation (HPBA)	National Board of Certification in Hearing Instrument Sciences (NBC-HIS)	Oncology Nursing Certification Corporation (ONCC)
Heuristic Solutions		Pediatric Nursing Certification Board (PNCB)
Hospice and Palliative Credentialing Center (HPCC)	National Board of Certification in Occupational Therapy (NBCOT)	Pharmacy Technician Certification Board (PTCB)
Institute for Credentialing Excellence (ICE)	National Board of Surgical Technology and Surgical Assisting (NBSTSA)	Professional Association of Therapeutic Horsemanship International (PATH)
Institute of Hazardous Materials Management (IHMM)	National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)	PSI Services
Institute of Inspection Cleaning and Restoration Certification (IICRC)		Pearson Vue
International Coach Federation (ICF)	National Certification Corporation (NCC)	QualityPro
International Information System Security Certification Consortium (ISCS ²)	National Commission on Certification of Physician Assistants (NCCPA)	Rehabilitation Nursing Certification Board (RNCB)
Investments & Wealth Institute (IWI)	National Commission for Health Education Credentialing (NCHEC)	School Nutrition Association (SNA)
Irrigation Association		SeaCrest Consulting
IT Certification Council (ITCC)	National Council on Family Relations (NCFR)	Security Industry Association (SIA)
Laborers' International Union of North America Training & Education Fund (LIUNA)	National Kitchen and Bath Association (NKBA)	Society of Broadcast Engineers (SBE)
Medical-Surgical Nursing Certification Board (MSNCB)	National Recreation and Park Association (NRPA)	Specialty Pharmacy Certification Board (SPCB) c/o National Association of Specialty Pharmacy Certification Board
National Association of Insurance and Financial Advisors (NAIFA)	National Restaurant Association (NRA)	Spray Polyurethane Foam Alliance (SPFA)
National Association of Personal Financial Advisors (NAPFA)	National Roofing Contractors Association (NRCA)	Towing and Recovery Association of America, Inc. (TRA)
National Athletic Trainers' Association Board of Certification, Inc. (NATA/BOC)	National Society of Professional Engineers (NSPE)	National Board of Public Health Examiners (NBPHE)