



PROFESSIONAL  
CERTIFICATION  
COALITION

January 24, 2023

Rep. William Mercer  
1301 East Sixth Avenue  
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[wwmercercer406@gmail.com](mailto:wwmercercer406@gmail.com)

**Re: H.B. 152**

Dear Representative Mercer:

The Professional Certification Coalition (PCC) writes to share our views regarding H.B. 152. The PCC urges amendments to ensure out-of-state applicants for licensure are not held to lower standards than Montana 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, 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 urges the legislature to amend H.B. 152 as necessary to reflect the attached [Statement of Principles](#). Specifically, the PCC proposes that Section 37-1-304(1) be amended to read: “An applicant for licensure by endorsement is subject to the application procedure in [section 1] and must have an active license in good standing, **in an occupation or profession with a substantially similar scope of practice to that in this state**, from a jurisdiction whose license qualifications, measured at the time of application to this state, are substantially equivalent to the license qualifications in this state, as determined by the department.”

This bill directly affects protections for the public and 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 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 Members of the PCC

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

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