



PROFESSIONAL  
CERTIFICATION  
COALITION

February 15, 2023

Sen. Adam P. Ebbin, *Chair*  
Senate General Laws and Technology Committee  
900 E Main St, E520  
Richmond, VA 23219-3548  
[district30@senate.virginia.gov](mailto:district30@senate.virginia.gov)

**Re: H.B. 2180**

Dear Senator Ebbin:

The Professional Certification Coalition (PCC) writes to share our views regarding H.B. 2180, which provides for an alternative pathway to licensure for unlicensed individuals from other states. While the PCC supports reducing barriers to employment and decreasing obstacles to worker mobility, we urge amendments to H.B. 2180 to ensure that Virginia residents can rely on occupational licensing agencies to protect against occupational practice by potentially 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, 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. In its current form, H.B. 2180 permits work experience to substitute for other substantive evidence of skills or competency if the applicant's home state does not require licensure. There is no requirement that the individual's qualifications meet or exceed the required qualifications for licensure in Virginia. Work experience alone is not an adequate proxy for demonstrated qualifications, as mere length of employment does not establish that a worker meets competency and skill levels expected of licensed professionals.

Accordingly, the PCC urges the legislature to amend H.B. 2180 to ensure that the standards for Virginia licensure are maintained. Specifically, the PCC proposes the following amendments:

- Amend Section 54.1-205(A)(3) to read: “The board in the other state or state or original licensure required the individual to pass an examination and to meet certain standards related to education, training, or experience, **and such standards are substantially**

**equivalent or more stringent than the minimum education requirements, work experience, apprenticeship requirements, clinical supervision, examination, and credential requirements required of licensees in the Commonwealth, as determined by the board in the Commonwealth.”**

- Amend Section 54.1-205(B)(2) to add a new requirement for reciprocal licensure: “The individual has worked in the occupation at least three years **and demonstrates at least substantially equivalent educational, training, examination, credential, and experience to that required for Virginia licensees in the occupation, as determined by the boards.**”

This bill directly affects protections for the public and also for 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. If, due to variations in licensing laws, reciprocal licensure allows unqualified or unfit individuals to practice, the public’s trust in certified professionals and their regulated professions could 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 alternative pathways to licensure 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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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 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 Information System Security Certification Consortium (ISC<sup>2</sup>)

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 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)