



PROFESSIONAL
CERTIFICATION
COALITION

February 17, 2023

Sen. Hob Bryan, *Chair*
Senate Committee on Public Health and Welfare
hbryan@senate.ms.gov

Sen. David Parker, *Vice Chair*
Senate Committee on Public Health and Welfare
dparker@senate.ms.gov

Re: H.B. 1039

Dear Senators Bryan and Parker:

The Professional Certification Coalition (PCC) writes to share our views regarding H.B. 1039. The PCC supports the Military Family Freedom Act's reduction of barriers to employment for veterans. The PCC urges additional amendments to existing law to ensure that Mississippi 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, especially current and former members of the military and their families. 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. Further, 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.

Moreover, for veterans who have been out of the military for decades, the importance of protecting the standards for a state-issued license increases, and the policy reasons are weaker for granting an applicant an exception from those standards based on past military service. Accordingly, the PCC proposes the following amendments to current law to ensure that the standards for Mississippi licensure are maintained when granting reciprocal licensure:

- Amend Section 73-50-1(3)(a) to read: “The applicant has been awarded a military occupational specialty, completed a military program of training, completed testing or equivalent training, **examination, credential, and experience as are required of Mississippi licensees in the occupation, as determined by the occupational licensing board.**”
- Amend Section 73-50-1(4) to add a new requirement (d) “**The applicant demonstrates at least substantially equivalent educational, training, examination, credential, and experience as**

are required of Mississippi licensees in the occupation, as determined by the occupational licensing board.”

If these amendments are not included, **the PCC urges limiting the application of H.B. 1039 to “recent veterans,”** such as those who have completed their military service within the two-year period prior to applying for licensure.

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 will be irreparably damaged, especially for occupations in which the public conflates certification status with licensure. The COVID-19 pandemic caused staffing shortages and workplace disruptions across sectors – including state agencies – that at times slowed the pace of expected workflows. While the PCC commends H.B. 1039 for attempting to ensure that such delays do not unduly prejudice applicants for licensure, neither should staffing issues result in conferring an Mississippi license on potentially unqualified individuals.

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

International Coach Federation (ICF)

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 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)