



PROFESSIONAL  
CERTIFICATION  
COALITION

March 23, 2023

Sen. Larry Walker  
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Sen. Michael Dugan  
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Sen. Kay Kirkpatrick  
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Sen. Frank Ginn  
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Sen. Ed Harbison  
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Sen. Tonya Anderson  
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Sen. Ed Setzler  
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Rep. Bethany Ballard  
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**Re: S.B. 195**

Dear Senators Walker, Dugan, Kirkpatrick, Ginn, Harbison, Anderson, Setzler, and Representative Ballard:

The Professional Certification Coalition (PCC) writes to share our views regarding S.B. 195. The PCC urges amendments to ensure out-of-state applicants for licensure are not held to lower standards than Georgia 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 S.B. 195 as necessary to reflect the attached [Statement of Principles](#).

Specifically, the PCC proposes the following amendments to ensure that the standards for Georgia licensure are maintained when granting licensure by endorsement:

- Amend Section 43-1-34(b)(1) to read: “Holds a current and valid license to practice a profession, business, or trade issued by another state for an occupation with a similar

scope of practice **and with substantially equivalent or more stringent educational, training, examination, credential, and experience requirements to that** in this state, as determined by a professional licensing board or other board;”

- Amend Section 43-1-34(c)(1) to read: “Such service member or spouse worked in such profession, business, or trade in another state for at least three years **and demonstrates at least substantially equivalent educational, training, examination, credential, and experience as are required of Georgia licensees in the occupation, as determined by a professional licensing board or other board;**”

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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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)