



PROFESSIONAL  
CERTIFICATION  
COALITION

April 28, 2023

Sen. Ben Brown  
201 W Capitol Ave  
Jefferson City, MO 65101-1556  
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**Re: S.B. 88**

Dear Senator Brown:

The Professional Certification Coalition (PCC)<sup>1</sup> writes to share our views regarding S.B. 88, which would establish an alternative pathway to licensure for unlicensed, out-of-state individuals. The PCC supports recent changes made to the bill so that only a temporary license would be issued based on work experience. **However, the PCC urges an additional amendment for occupations that require private certification for licensure.**

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.

For certain occupations, Missouri requires applicants to earn a private professional certification to demonstrate that they have achieved the core knowledge, skills, and competencies for that occupation. Even as amended, S.B. 88 would permit unqualified individuals to apply for a temporary license and hold themselves out as qualified, despite not having demonstrated the skills and knowledge required to earn the requisite private certification. This puts Missouri residents at risk. A history of employment alone does not prove the competency and skill levels expected of licensed professionals in Missouri. We therefore urge that S.B. 88 be further amended to require that applicants for a temporary license hold the private certification that Missouri licensing laws otherwise require for that occupation.

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<sup>1</sup> The PCC is a nonpartisan, 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.

Specifically, the PCC urges the legislature to add a new subsection (5) to Section 324.004(5), clarifying that the bill's alternative pathways to licensure do not apply with respect to: **“Any occupation for which the licensing requirements in this state include that the applicant holds a private certification as a condition of licensure, if the applicant does not currently hold that private certification. Where a licensing law specifies a private certification or other substantive qualifications as alternative eligibility standards for a license, an out-of-state applicant must either hold that current and valid private certification or demonstrate qualifications at least equivalent to the alternative eligibility standards required of Missouri residents.”**

This bill directly affects protections for the public and PCC members that confer credentials to professionals in occupations in which certification is a condition of licensure. **If, due to variations in licensing laws, S.B. 88 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 associates an individual's status as a certified professional with licensure.**

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 Board)  
Certified Fund Raising  
Executive International (CFRE)  
CertiProf, LLC

Chartered Financial Analyst  
Institute (CFA Institute)  
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)