



PROFESSIONAL  
CERTIFICATION  
COALITION

February 16, 2024

Rep. Rick Taggart  
200 E Colfax  
Denver, CO 80203  
[rick.taggart.house@coleg.gov](mailto:rick.taggart.house@coleg.gov)

Rep. Mike Weissman  
200 E Colfax Ave  
Denver, CO 80203  
[mike.weissman.house@coleg.gov](mailto:mike.weissman.house@coleg.gov)

Sen. Rhonda Fields  
200 E Colfax  
Denver, CO 80203  
[rhonda.fields.senate@coleg.gov](mailto:rhonda.fields.senate@coleg.gov)

Sen. Bob Gardner  
200 E Colfax  
Denver, CO 80203  
[bob.gardner.senate@coleg.gov](mailto:bob.gardner.senate@coleg.gov)

**Re: HB 24-1097**

Dear Rep. Taggart, Rep. Weissman, Sen. Fields, and Sen. Gardner:

The Professional Certification Coalition (PCC)<sup>1</sup> writes regarding HB 24-1097. The PCC respectfully requests an amendment to ensure out-of-state applicants for licensure are not held to materially lower standards than Colorado expects of its own residents.

The PCC supports reducing unnecessary barriers for licensed professionals who move to a new state, especially for military servicemembers 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. In adopting specific qualification requirements for occupational licensing, Colorado has balanced protection of the public with the interests of lowering costs, promoting market competition, and reducing barriers to entry to an occupation. That balance is best achieved by applying consistent standards for earning a license in each profession, and by ensuring that any changes to licensing requirements apply to all who practice a profession in Colorado, not just those seeking to relocate from a different state.

For certain occupations, Colorado requires applicants to earn a private professional certification to demonstrate that they have achieved the core knowledge, skills, and competencies for that occupation. HB 24-1097 would permit unqualified individuals to apply for a license and hold themselves out as qualified, despite not having demonstrated the skills and knowledge required

---

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

to earn the requisite private certification. This puts Colorado residents at potential risk. A history of employment alone does not prove the competency and skill levels expected of licensed professionals in Colorado, and not all private certifications are comparable to each other or equivalent to those that Colorado residents are required to hold as a condition of licensure. We therefore urge that HB 24-1097 be amended to require that applicants hold the private certification that Colorado licensing laws otherwise require for that occupation.

Specifically, the PCC urges the following amendment:

**“Notwithstanding any other provision in this section, if the occupational licensing rules of the board require applicants to hold a current and valid private certification, the board must require the applicant who seeks a license under the provisions of this section to hold that private certification before issuing a license under this section. Where a licensing law specifies a private certification or other substantive qualifications as alternative eligibility standards for a license, an applicant who seeks a license under the provisions of this section must either hold that current and valid private certification or demonstrate qualifications at least equivalent to the alternative eligibility standards required in this state for practice of that lawful occupation.”**

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, HB 24-1097 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 the information below to discuss this further.

Sincerely,



Craig Saperstein  
Partner, Pillsbury Winthrop Shaw Pittman LLP  
Legal Counsel to the PCC  
Email: [craig.saperstein@pillsburylaw.com](mailto:craig.saperstein@pillsburylaw.com)



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 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)

Beingcert

Board of  
Certification/Accreditation  
(BOC)

Board of Certified Safety  
Professionals (BCSP)

Board of Pharmacy Specialties  
(BPS)

Building Commissioning  
Certification Board (BCCB)

Building Industry Consulting  
Service International, Inc.  
(BICSI)

Certification Board for Diabetes  
Care and Education (CBDCE)

Certification Board for Music  
Therapists (CBMT)

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)

Construction Management  
Association of America  
(CMAA)

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)

Human Resource Certification  
Institute, Inc. (HRCI)

Institute for Credentialing  
Excellence (ICE)

Institute of Hazardous Materials  
Management (IHMM)

International Coach Federation  
(ICF)

International Information  
System Security Certification  
Consortium (ISC<sup>2</sup>)

Investments & Wealth Institute  
(IWI)

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