



February 16, 2024

Sen. Jake Hoffman, *Chair*
Senate Committee on Government
jake.hoffman@azleg.gov

Sen. Wendy Rogers, *Vice Chair*
Senate Committee on Government
wrogers@azleg.gov

Re: SB 1510

Dear Senator Hoffman and Senator Rogers:

The Professional Certification Coalition (PCC)¹ writes regarding SB 1510. In its current form, SB 1510 sets up private certification as a substitute for licensure, which would place the burden of enforcement on private certification organizations that have neither the resources nor authority to take over for the state. It would also remove vital state oversight and enforcement of licensing standards and put the public at risk. **For these reasons, unless the bill is substantially amended, the PCC must oppose it.**

When occupations are licensed, consumers expect that any individual practicing that occupation meets baseline qualifications required by the state. The current language of SB 1510, however, would allow individuals in Arizona to practice in **licensed professions without a license and without demonstrating the substantive qualifications of licensed professional.**

The proposed substitute – private certification – lacks any requirement that the individual’s qualifications are at least equivalent to the training, experience, examination performance, or other substantive criteria that a licensed individual must demonstrate to be granted a license in the occupation. Rather, **any company or organization can register with the state as a “private certifying organization” as long as it establishes qualifications – however minimal – relating to the occupation it credentials, publishes those qualifications on a state website, and, within a year of registering, finds 50 individuals in the U.S. willing to purchase its credentials.**

The bill opens the door for unscrupulous individuals to take advantage of consumers and contains insufficient safeguards for consumers to make an informed decision regarding the services of an unlicensed individual.

For these reasons, **the PCC opposes SB 1510 unless it is amended to delete the provisions that circumvent licensure laws in Arizona, removing Section E and F of the bill.** The PCC does not oppose the provisions of the bill that would create a voluntary registry of private

¹ 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. The PCC’s 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.

certifying organizations and their qualifications. In addition to the deletion of Sections E and F, the PCC proposes an additional amendment to better serve and protect the public:

- Amend the definition of “Private Certifying Organization” to “a nongovernmental organization **that issues credentials that are widely recognized in the field based on demonstrated qualifications relevant to performance of the occupation to which the certification pertains, including by the individual’s demonstration through examination or assessment that the individual has a specified level of knowledge, competency, or skill required to meet standards in the profession, and that** allows any individual to apply for private certification regardless of the individual’s race, creed, color, ethnicity, national origin, religion, sex, sexual orientation or marital status.”

The PCC stands ready to work with lawmakers who seek to craft legislation that strikes a reasonable balance between the benefits of occupational licensing and the desire for free markets in employment. Unfortunately, in its current form, this legislation goes too far in removing protections for the public.

Thank you for your consideration of these issues. 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 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 (ISC²)

Investments & Wealth Institute
(IWI)

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| 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) |