



PROFESSIONAL
CERTIFICATION
COALITION

February 3, 2025

Sen. Dusty Deevers
2300 N. Lincoln Blvd
Oklahoma City, OK 73105
dusty.deevers@oksenate.gov

Re: SB 317

Dear Senator Deevers:

The Professional Certification Coalition (PCC)¹ writes regarding the potential negative effects of SB 317. In its current form, SB 317 sets up private certification as a substitute for licensure, which places enforcement burdens on private certification organizations that have neither the resources nor the authority to take over from the state. It would also remove vital state oversight and enforcement of licensing standards and puts the public at risk. **For these reasons, unless the bill is substantially amended, we oppose it.**

When occupations are licensed, consumers have an expectation that any individual practicing that occupation meets baseline qualifications required by the state. The current language of SB 317, however, would allow individuals in Oklahoma to practice in *licensed* professions **without a license**. 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 can, within a year of registering, find 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 example, the bill contains the following deficiencies:

- Although the bill requires an unlicensed practitioner to disclose their unlicensed status on a sign, nothing in the bill ensures that a consumer has *actually seen* such a sign, understands its import, or has been provided information on the difference in

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.

qualifications between a privately certified individual and a licensed individual in the profession. Many consumers who use the services of licensed professionals never set foot on the premises of the business.

- A person hiring the unlicensed individual may not be the end-user of the services or work product for which the person has contracted. For example, licensed civil and professional engineers build structures that members of the public enter or traverse; the public reasonably expects that such structures were designed by qualified individuals. It would imperil public safety to permit unqualified individuals to practice as civil or professional engineers, regardless of any prominent disclosure the unlicensed individual uses.

For these reasons, **the PCC opposes SB 317 unless it is amended to delete the provisions that circumvent licensure laws in Oklahoma, removing Sections 3 and 4 of the bill.** The PCC does not oppose the provisions of the bill that would create a voluntary registry of private certifying organizations and their qualifications, but proposes additional amendments 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.”

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

Thank you for your consideration of these issues. If you have any questions regarding this letter, please reach out to us using the contact information identified below.

Sincerely



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AABC Commissioning Group
ABRET Neurodiagnostic
Credentialing & Accreditation
(ABRET)
ABS International: the
Association for Biosafety and
Biosecurity (ABSIA)
Academy for Certification of
Vision Rehabilitation &
Education Professionals
(ACVREP)
American Association of
Critical-Care Nurses (AACN)
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
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 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)
Chartered Financial Analyst
Institute (CFA Institute)
Commission for Case Manager
Certification (CCMC)
Community Association
Institute (CAI)
Competency & Credentialing
Institute (CCI)

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)
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 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 for Health Education Credentialing (NCHEC)

National Commission on Certification of Physician Assistants (NCCPA)

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)

Pearson Vue

Pediatric Nursing Certification Board (PNCB)

Pharmacy Technician Certification Board (PTCB)

Professional Association of Therapeutic Horsemanship International (PATH)

PSI Services

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)

Spray Polyurethane Foam Alliance (SPFA)

Towing and Recovery Association of America, Inc. (TRA)

Last updated February 3, 2025