PROFESSIONAL CERTIFICATION COALITION

February 4, 2025

Rep. Laurin Hendrix, *Chair*
House Committee on Rules
lhendrix@azleg.gov

Rep. Neal Carter, *Vice Chair*
House Committee on Rules
ncarter@azleg.gov

Re: HB 2282

Dear Reps. Hendrix and Carter:

The Professional Certification Coalition (PCC)[1] writes to share our views regarding HB 2282. In its current form, HB 2282 would create an unwarranted exception to licensure standards on which the public relies. While the PCC's preference is to work with bill sponsors on amendments where we identify areas of disagreements, these aspects of the bill are core to the legislation. **The PCC accordingly must oppose HB 2282**; we explain the basis for our concerns below.

The PCC recognizes that not all occupations may require formal higher education for an individual to gain the necessary expertise to practice that occupation, and the PCC supports the development and recognition of apprenticeship programs as alternative pathways to entry into some regulated occupations. The PCC's concern about HB 2282, however, is that it treats all regulated professions in the same way. Title 32 of the Arizona Revised Statutes, which the bill would amend, governs licensing requirements for occupations as varied as physicians, cosmetologists, professional engineers, real estate agents, and dentists. The bill does not distinguish between these occupations, but provides that, notwithstanding any other law, each regulating authority in Title 32 "shall establish criteria for granting licenses … through apprenticeship programs."

Determining whether an alternative pathway is appropriate requires the balancing the need to protect the public and the interests of lowering costs, promoting market competition, and reducing barriers to entry to an occupation, by reviewing the specific requirements for earning a license, certificate, or registration in each profession. However, as currently drafted, HB 2282 mandates all occupations – from barbers to CPAs to radiologists – to establish a pathway to bypass current requirements through an apprenticeship program.

For these reasons, the PCC opposes HB 2282 in its current form and urges the committee to refrain from advancing this legislation. The PCC would not oppose an amended version of the bill that proposes apprenticeship pathways to licensure only for specific occupations that already

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[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.

have approved apprenticeship programs in place, but the Arizona legislature is better positioned than the PCC to identify those occupations.

The PCC stands ready to work with lawmakers who seek to craft legislation that strikes a reasonable balance between the benefits of occupational regulation 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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PROFESSIONAL CERTIFICATION COALITION

Member List

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 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 (ISC^2)

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)

Project Management Institute (PMI)

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)