



PROFESSIONAL CERTIFICATION COALITION

February 13, 2025

The Honorable Bob Hall
P.O. Box 12068
Capitol Station
Austin, TX 78711
bob.hall@senate.texas.gov

Re: SB 100

Dear Senator Hall:

The Professional Certification Coalition (PCC)¹ writes regarding SB 100. The PCC respectfully requests an amendment to ensure that out-of-state applicants for licensure are not held to materially lower standards than Texas expects of its own residents. Consumers will not be aware that the licensed individual they are hiring may not have the qualifications that a Texas license ordinarily requires, so ensuring that at least baseline standards are met is essential.

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 red tape: 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 each licensed occupation, Texas has balanced protection of the public with the interests of lowering costs, promoting market competition, and reducing barriers to entry to that occupation. That balance is best achieved by applying consistent standards for earning a license in each profession, and by ensuring that any changes to substantive licensing requirements apply to all who practice the profession in Texas, not just those seeking to relocate from a different state.

For certain occupations, Texas requires applicants to earn a private professional certification to demonstrate that they have achieved the core knowledge, skills, and competencies for that occupation. SB 100 would permit unqualified individuals to apply for a license and hold themselves out as qualified, despite not having demonstrated the skills and knowledge required to earn the requisite private certification. This puts Texas residents at potential risk. A history of employment alone does not prove the competency and skill levels expected of licensed professionals in Texas. We therefore urge that SB 100 be amended to require that applicants hold the private certification that Texas licensing laws otherwise require for an occupation.

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. 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.

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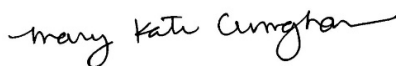
Specifically, the PCC urges the following amendment:

“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, SB 100 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,



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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)

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)

Last updated February 13, 2025