



PROFESSIONAL  
CERTIFICATION  
COALITION

March 3, 2025

Sen. Mark Noland, *Chair*  
Senate Committee on Business, Labor and  
Economic Affairs  
mark.noland@legmt.gov

Sen. Jeremy Trebas, *Vice Chair*  
Senate Committee on Business, Labor and  
Economic Affairs  
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Sen. Willis Curdy, *Vice Chair*  
Senate Committee on Business, Labor and  
Economic Affairs  
willis.curdy@legmt.gov

**Re: HB 246**

Dear Senators Noland, Trebas, and Curdy:

The Professional Certification Coalition (PCC)<sup>1</sup> writes regarding HB 246. The PCC respectfully requests an amendment to ensure that out-of-state applicants for licensure are not held to materially lower standards than Montana expects of its own residents. Consumers will not be aware that the licensed individual they are hiring may not have the qualifications that a Montana 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, Montana 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 Montana, not just those seeking to relocate from a different state.

For certain occupations, Montana requires applicants to earn a private professional certification to demonstrate that they have achieved the core knowledge, skills, and competencies for that occupation. HB 246 could permit unqualified individuals to apply for a license and hold themselves out as qualified, despite not having demonstrated the skills and knowledge required

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<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.

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to earn the requisite private certification. This puts Montana residents at potential risk. We therefore urge that HB 246 be amended to require that applicants hold the private certification that Montana licensing laws otherwise require for an 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 246 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 (ISC<sup>2</sup>)  
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 March 3, 2025*