



PROFESSIONAL
CERTIFICATION
COALITION

April 21, 2025

Rep. James Buchanan, *Chair*
House Commerce Committee
james.buchanan@myfloridahouse.gov

Rep. Juan Carlos Porras, *Vice Chair*
House Commerce Committee
juancarlos.porras@myfloridahouse.gov

Re: HB 1461

Dear Rep. Buchanan and Rep. Porras:

The Professional Certification Coalition (PCC)¹ writes regarding HB 1461 to address our concerns that it would substantially weaken important occupational regulations that protect public health, safety, and welfare.

The PCC supports a thoughtful approach to licensing to ensure that unnecessary obstacles are removed. However, in its current form (the Committee Substitute adopted by the State Administration Budget Subcommittee), HB 1461 would abolish occupational licensing boards across a broad range of occupations, eliminating the subject matter expertise of those boards that is essential for effective oversight of licensees, regardless of whether eliminating a particular state licensing agency is in the public interest. Licensing boards that have been duly established by the legislature and on which the public relies should not be abolished without the legislature engaging in informed review of those boards. The wholesale approach of this legislation – rather than a measured, profession-by-profession analysis – will undoubtedly harm both professionals and the Floridians who they serve.

Further, with the elimination of licensing boards, the Florida Department of Business and Professional Regulation (the DBPR) would be the sole entity responsible for granting and renewing licenses, as well as for oversight and enforcement of professional practice standards and disciplinary rules. The DBPR lacks the occupation-specific expertise and resources to serve as a substitute for the numerous boards that would be abolished by this legislation. By statute, for example, licensing boards may sanction or revoke the license of a veterinarian for negligence or incompetency in the practice of veterinary medicine, and for failure to practice medicine with that level of care, skill, and treatment which is recognized by a reasonably prudent veterinarian as being acceptable under similar conditions and circumstances, among other grounds. The

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.

April 21, 2025

Page 2

veterinary licensing board consists of seven members, five of which must be licensed veterinarians. That board is qualified to assess whether a veterinarian violated practice standards — the DBPR is not.

Finally, the proposal to eliminate certain existing requirements to obtain and maintain licensure, most notably among them requirements for licensees to obtain continuing professional education (CPE), is quite concerning. Continuing education is crucial to ensuring that professionals stay current with standards and new developments in their profession. This is particularly true in quickly-evolving fields and in areas that involve significant interaction with the public. Broadly eliminating CPE requirements for all professions under the purview of the DBPR risks harming Floridians' public health and safety.

We understand that this bill is not in final form. To that end, the PCC welcomes the opportunity to meet with you to discuss the impact of this legislation on our members. We also urge you to consider the following amendment:

- Add a safe harbor provision: **“Notwithstanding any other provision in this section, nothing in the chapter shall be construed to alter any requirement in a licensure statute or regulation for an individual to hold current private certification as a condition of licensure or renewal of licensure.”**

The PCC stands ready to work with you 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 by removing vital 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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cc: Representative Taylor Yarkosky
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Representative Tiffany Esposito
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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)

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