PROFESSIONAL CERTIFICATION COALITION

April 28, 2025

Senator Kevin Sparks
kevin.sparks@senate.texas.gov
PO Box 12068
Capitol Station
Austin, TX 78711

Re: Senate Bill 2255

Dear Senator Sparks:

The Professional Certification Coalition (PCC)[1] writes regarding SB 2255. 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 2255 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. We therefore urge that SB 2255 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.

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 2255 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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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)