



PROFESSIONAL
CERTIFICATION
COALITION

February 10, 2026

Senator Donald Douglas
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702 Capital Ave
Annex Room 204
Frankfort, KY 40601

Senator Mike Wilson, *Majority Whip*
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Re: SB 78

Dear Senators Douglas and Wilson:

The Professional Certification Coalition (PCC)¹ writes regarding SB 78. We respectfully request that the Kentucky legislature amend the bill to remove any prohibition on consideration of board certification as part of credentialing, participation, reimbursement, or enhanced reimbursement decisions for health care providers. Removing this one-size-fits-all prohibition will permit organizations charged with ensuring individuals' health to continue to make free market decisions.

The PCC recognizes and supports the goal of ensuring that credentialing criteria used by insurers, managed care plans, and entities that employ health care providers (e.g., health maintenance organizations, nonprofit hospitals, and medical-surgical, dental, and health service corporations), are objective and relevant to the services provided by health care providers. We further agree that health care providers should not be excluded from participation based on geographic location, the treatment of high-risk populations, past health conditions, or current health conditions that are not relevant to the health care provider's ability to provide safe, competent, and relevant care. These principles are important to maintain fair and nondiscriminatory access to employment and to provider networks.

However, SB 78 goes beyond these objectives by categorically prohibiting insurers and employers from requiring board certification as a condition of credentialing, participation, reimbursement, or employment for a wide range of health care professionals, including physicians, podiatrists, dentists, chiropractors, psychologists, home medical services providers, advanced practice nurses, optometrists, pharmacists, and physician assistants, and any other occupation defined as a health care provider under applicable regulations. Board certification is widely recognized as demonstrating a board certified provider's training, knowledge, and

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.

competencies within the scope of their credential. In many contexts, it also serves as one of several tools that insurers and employers legitimately use to assess provider qualifications and quality. For example, for the physician and pharmacist professions, “board certification” refers to specialty certifications, representing advanced training and experience beyond the generalist level needed for state licensure. There are legitimate reasons that a hospital may include a specific specialty board certification as a required qualification for particular jobs that call for objective measures of advanced or specialized expertise. Indeed, the Accreditation Council for Graduate Medical Education (ACGME)’s requirements for a hospital to have an accredited residency program include that physician faculty members must generally hold current board certification in their specialty.² Yet as currently drafted, S.B. 78 would prohibit the hospital from making hiring choices on that basis.

In addition, for some non-physician health care professions, board certification is required under Kentucky law for both initial licensure and for renewal of licensure, as with physician assistants (see K.R.S. 311.844(3)(c)). Thus, Kentucky hospitals and health services corporations employing of physician assistants must by law “require a health care provider to be board certified,” which S.B. 78 in its current form would prohibit.

But even where a decision to include board certification as a job qualification is not required by law or to satisfy accreditation standards, the legislature should not interfere with a health care employer’s assessment of what qualifications will best enable the employer to meet its hiring needs. Similarly, the legislature should continue to allow insurers to consider recognized professional credentials as part of an overall, nondiscriminatory credentialing framework. A balanced approach should permit insurers to evaluate multiple, relevant indicators of provider competence rather than mandating a one-size-fits-all prohibition. It is inappropriate for legislation to intervene in free market decisions of this nature.

Specifically, the PCC urges the following amendment:

- Remove the amended subsection (3)(d)(2) by deleting paragraph c., which prohibits requiring a health care provider to be board certified.

Thank you for your consideration of these issues. Please feel free to reach out to us using the contact information identified below.

Sincerely,

² See ACGME Common Program Requirements (Residency), Section 2.10 (at https://www.acgme.org/globalassets/pfassets/programrequirements/2026-prs/cprresidency_2026.pdf).



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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 Medical Certification
Association (AMCA)
American Nurses Credentialing
Center (ANCC)
American Payroll Association
(APA)
American Registry of
Radiologic Technologists
(ARRT)
American Society of
Association Executives (ASAE)
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)
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)
NALA – The Paralegal
Association

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 Board for Acupuncture and Herbal Medicine (NCBAHM)

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 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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