



PROFESSIONAL CERTIFICATION COALITION

October 26, 2021

Rep. Scott Wiggam, *Chair*
House Committee on State and Local Government
77 South High Street
Vern Riffe Center
Columbus, OH 43215-6111
rep01@ohiohouse.gov

Rep. Marilyn John, *Vice Chair*
House Committee on State and Local Government
77 South High Street
Vern Riffe Center
Columbus, OH 43215-6111
rep02@ohiohouse.gov

Re: H.B. 203

Dear Representative Wiggam and Representative John:

The Professional Certification Coalition (PCC) writes regarding H.B. 203, which provides for licensing reciprocity and alternative paths to licensure based on private credentials. The PCC urges amendments to H.B. 203 to ensure that Ohio residents can rely on occupational licensing agencies to protect against granting licenses to unqualified individuals.

The PCC is a nonprofit 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.

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: substantive state-specific licensing requirements protect the public from unqualified or unethical practitioners and uphold the integrity of licensed professions as a whole. The PCC commends the bill for recognizing that not all licenses are the same and limiting reciprocity for individuals licensed by another state to circumstances in which the out-of-state license is “substantially similar” to Ohio’s license.

As currently drafted, however, the bill omits any similar safeguards from its provisions creating alternative pathways for unlicensed individuals relocating to Ohio. Because not all privately issued credentials or work experience can provide assurances of competency or qualifications equivalent to Ohio’s licensing laws, the PCC urges the legislature to amend H.B. 203 to ensure that the standards for Ohio licensure are maintained.

Specifically, the PCC proposes the following amendments:

- Amend Sec. 4796.03(D)(1) to read: “Except as provided in division (D) (2) of this section, the applicant was required to satisfy minimum education, training, or experience requirements or pass an examination to receive the out-of-state occupational license or government certification, **and such requirements are substantially equivalent or more stringent than the educational,**

training, examination, credentials, and experience required of Ohio residents authorized to practice in this state.”

- Amend Sec. 4796.04 to include a new requirement (D): **“The applicant demonstrates at least substantially equivalent educational, training, examination, credential, and experience as are required of Ohio licensees in the occupation, as determined by the licensing authority.”**

Not all private certifications are equivalent. Our proposed amendments would require unlicensed out-of-state applicants to demonstrate substantive qualifications that are at least comparable to those required of in-state applicants and would avoid bogus or flimsy certification programs being used as a substitute for licensure. At the same time, for licensed occupations that condition licensure on obtaining and maintaining private certification, accepting that certification from out-of-state applicants can provide an alternative pathway to universal licensure that still safeguards Ohio residents from unqualified practitioners.

H.B. 203 directly affects both protections for the public and PCC members that credential professionals in regulated occupations, such as health care, in which certification by recognized private certification organizations is a condition of licensure. If, due to variations in licensing laws, reciprocal licensure allows unqualified or unfit individuals to practice, the public’s trust in such certified professionals and their respective regulated professions will be irreparably damaged, especially for occupations in which the public conflates certification status with licensure.

Further, even PCC members that issue certifications to individuals in fields that do not require licensure have an interest in this issue. Certification organizations – and professional societies that represent individuals who hold certification credentials – rely on the role of licensing agencies to protect the public. By their nature, they are also interested in upholding professional standards for knowledge, skills, conduct, and qualifications. If reciprocal licensure laws create loopholes that weaken how state licensing agencies enforce such standards, this is a matter of great concern to the certification community.

Thank you for your attention to these issues and consideration of the PCC’s views. If you have any questions regarding this letter, please feel free to reach out to us using the contact information identified below.

Sincerely,



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CC:

Rep. Jena Powell
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Current List of PCC Members

1. ABRET Neurodiagnostic Credentialing & Accreditation (ABRET)
2. ABSA International: the Association for Biosafety and Biosecurity (ABSA)
3. AABC Commissioning Group
4. Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP)
5. Alliance of Hazardous Materials Professionals
6. American Association of Post-Acute Care Nurses (AAPACN)
7. American Association of Critical-Care Nurses (AACN)
8. American Association of Professional Landmen
9. American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABCOP)
10. American Board of Certification for Gastroenterology Nurses (ABCGN)
11. American Board of Neuroscience Nursing (ABNN)
12. American Board of Post-Acute and Long-Term Care Medicine (ABPLM)
13. American Board of Foot and Ankle Surgery (ABFAS)
14. American Board of Wound Management (ABWM)
15. American Industrial Hygiene Association (AIHA)
16. American Medical Certification Association (AMCA)
17. American Nurses Credentialing Center (ANCC)
18. American Payroll Association (APA)
19. American Society of Association Executives (ASAE)
20. American Society of Civil Engineers (ASCE)
21. American Speech-Language-Hearing Association (ASHA)
22. American Traffic Safety Services Association (ATSSA)
23. American Translators Association (ATA)
24. American Veterinary Medical Association (AVMA)
25. Association for Financial Counseling & Planning Education (AFCPE)
26. Association for Financial Professionals (AFP)
27. Association of Surgical Technologists (AST)
28. Behavior Analyst Certification Board (BACB)
29. Building Industry Consulting Service International (BICSI)
30. Board of Certification/Accreditation (BOC)
31. Board of Certified Safety Professionals (BCSP)
32. Board of Pharmacy Specialties (BPS)
33. Building Commissioning Certification Board (BCCB)
34. CCIM Institute (issues the Certified Commercial Investment Member designation)
35. CFA Institute
36. Certification Board for Music Therapists (CBMT)
37. Certification Board of Infection Control and Epidemiology (CBIC)
38. Certification Council for Professional Dog Trainers
39. Certified Financial Planner Board of Standards (CFP)
40. Certified Fund Raising Executive International (CFRE)
41. Commercial Real Estate Certification Institute
42. Commission for Case Manager Certification (CCMC)
43. Commission on Nurse Certification (CNC)
44. CompTIA
45. Community Association Institute (CAI)
46. Construction Management Association of America (CMAA)
47. Council of Engineering and Scientific Specialty Boards (CESB)
48. Dental Assisting National Board (DANB)
49. Diving Equipment and Marketing Association (DEMA)
50. Entertainment Services and Technology Association (ESTA)
51. ETA International (ETA)
52. Financial Planning Association (FPA)
53. Hearth, Patio, & Barbecue Education Foundation

54. Heuristic Solutions
55. Hospice and Palliative Credentialing Center (HPCC)
56. Institute for Credentialing Excellence (ICE)
57. Institute of Certified Management Accountants (ICMA)
58. Institute of Hazardous Materials Management (IHMM)
59. Institute of Internal Auditors (IIA)
60. Irrigation Association
61. International Association of Healthcare Central Service Materiel Management (IAHCSMM)
62. International Association of Lighting Designers (IALD)
63. International Coach Federation (ICF)
64. International Foundation for Retirement Education (InFRE)
65. International Information System Security Certification Consortium (ISC²)
66. IT Certification Council (ITCC)
67. Laborers' International Union of North America Training & Education Fund (LIUNA)
68. Medical-Surgical Nursing Certification Board (MSNCB)
69. National Association of Legal Assistants, Inc. (NALA)
70. National Association of Insurance and Financial Advisors (NAIFA)
71. National Association of Personal Financial Advisors (NAPFA)
72. National Athletic Trainers' Association Board of Certification, Inc. (BOC)
73. National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA)
74. National Board of Certification in Hearing Instrument Sciences (NBC-HIS)
75. National Kitchen and Bath Association (NKBA)
76. National Board of Certification in Occupational Therapy (NBCOT)
77. National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)
78. Certification Board for Diabetes Care and Education (CBDCE)
79. National Certification Corporation (NCC)
80. National Commission on Certification of Physician Assistants (NCCPA)
81. National Commission for Health Education Credentialing
82. National Council on Family Relations (NCFR)
83. National Recreation and Park Association (NRPA)
84. National Restaurant Association (NRA)
85. National Roofing Contractors Association (NRCA)
86. National Society of Professional Engineers (NSPE)
87. Nephrology Nursing Certification Commission
88. Oncology Nursing Certification Corporation
89. Professional Association of Therapeutic Horsemanship International (PATH)
90. Pediatric Nursing Certification Board (PNCB)
91. Pharmacy Technician Certification Board (PTCB)
92. PSI Services
93. Pearson Vue
94. QualityPro
95. School Nutrition Association (SNA)
96. Sea Crest Consulting
97. Security Industry Association
98. Society of Broadcast Engineers (SBE)
99. Specialty Pharmacy Certification Board (SPCB) c/o National Association of Specialty Pharmacy Certification Board
100. Spray Polyurethane Foam Alliance (SPFA)
101. Towing and Recovery Association of America, Inc. (TRA)