

May 30, 2018

Lieutenant Governor Mike Parson  
State Capitol Building - Room 224  
Jefferson City, MO 65101

Re: HB 1719, HB 1500, and Professional Credentialing

Dear Lieutenant Governor:

I am writing today on behalf of many Missouri association professionals to express our deep concern with the impact of HB 1719 and HB 1500 on holders of voluntary certifications, and to ask you not to allow the bill to become law. With more than 40,000 members, the American Society of Association Executives (ASAE) is the largest organization in the world representing the interests of associations.

Together, our members represent 7,400 organizations that make the world smarter, safer, and better every day. Associations build a stronger economy, enhance job skills, improve systems and structures, and strengthen lives. At the heart of our community are people – researchers, innovators, mentors, communicators – whose expertise and hard work collectively help to create a stronger America and world.

HB 1719 and HB 1500 are extremely concerning to association professionals in several respects. **For the reasons described below, we ask that you to veto both bills and instead work with the legislature in January to find a better solution.**

Both HB 1719 and HB 1500 purport to expropriate under State of Missouri control the certification function that hundreds of non-governmental professional credentialing programs using the term “certification” that now perform very successfully, without direct government control, for the benefit and protection of the citizens of Missouri and other states. Examples include voluntary, non-governmental programs for the credentialing of physician specialists (from orthopedic surgeons to radiologists to anesthesiologists), for other healthcare providers (from specialty nurses to all kinds of therapists), and for many professionals other than in healthcare (financial planners, etc.). Both bills, however, define certification such that only the government may grant such recognition.

This language, if enacted and applied, would have disastrous effects for the public – employers, reimbursers, clients/customers/patients -- all of which rely upon objective and valid measures of knowledge and competence of these professionals developed by subject matter experts, not by regulatory agencies.

Similarly, the bills limit the right to use the title “registered” to those professionals whom state law requires to register with the state. This provision would bar professionals who hold private credentials using the term “registered” from truthfully advertising their earned credentials; numerous non-governmental professional credentialing programs now use the term “registered” as a synonym for “certified.”

Finally the bills establish standards for state-controlled licensing programs that are so rigorous and unrealistic that they could effectively result in ending state licensing of the professions, including doctors, lawyers, accountants, etc. Both bills, for example, contain language suggesting that only registration with the state, rather than licensure, should be required for any professions in which the public has access to “credentialing information” or the ability to “report abuses.” Most professional certification programs do provide easy access to the public to credentialing verification tools and accept reports of complaints against credentialed professionals. These measures complement state licensure oversight for licensed professionals, however, and are not intended to substitute to or supplant state licensure. In contrast to licensing bodies, voluntary credentialing organizations lack the legal authority and resources to investigate fully reports of abuses and oppose the state seeking to transfer to them responsibility for licensed professionals.

These all may be unintended consequences of the legislation; but they are clear and likely consequences nonetheless.

These provisions also have no appropriate place in these bills. Consistent with its title – the “Professional Employer Organization Act” – HB 1719 was intended from the outset to modify the state government’s approach to the licensing of occupations and professional employer organizations. On its face, the bill did not give any indication that it would redefine “certification” as an exclusively governmental function, blocking the role of private organizations in certifying an individual’s professional qualifications. Similarly, HB 1500 was introduced to address occupational requirements for working as a barber, hairdresser, or cosmetologist, not a vehicle to alter completely the State of Missouri’s approach to private certifications and professional licensing.

Nongovernmental professional credentialing is vital to America’s workforce. Associations – the largest provider of post-college professional training for workers – administer credentialing programs for many professionals as a means of enhancing their reputation and competence in their respective field – whether or not the state requires licensure for practitioners of those occupations. The purpose of these credentialing programs is not to burden skilled workers, but rather to allow them to demonstrate their professional capability and understanding of their field. It would be severely detrimental to devalue credentials held by Missouri workers.

Thank you for the opportunity to provide comments on this important issue. Please let us know how we can contribute in any way to this important discussion by contacting Jim Clarke, senior vice president of public policy, at 202.626.2865 or [jclarke@asaecenter.org](mailto:jclarke@asaecenter.org).

Sincerely,



John H. Graham, IV, FASAE, CAE  
President and CEO