



June 15, 2023

Sen. John Schickel
702 Capital Ave
Annex Rooms 283
Frankfort, KY 40601

Rep. Matthew Koch
702 Capital Ave
Annex Rooms 383
Frankfort, KY 40601

Dear Senator Schickel and Representative Koch:

We write on behalf of Kentucky's licensed architects, professional engineers, and land surveyors to express our concern with a proposal for universal recognition of occupational licenses (previously introduced as HB 343 during the 2023 Regular Session of the KY General Assembly). While we support the goal of facilitating responsible mobility and reciprocity of licensure, the specifics of the proposed legislation would actually create additional impediments when it comes to design professionals practicing in the Commonwealth.

HB 343 took a broad-brush approach to what is a very nuanced issue and failed to recognize that many professions already have fair and efficient systems for reciprocity in place. For example, the Kentucky Board of Architects has granted 864 reciprocal licenses in the past five years. In that time, the average approval period took less than two weeks, and only two applicants were denied. Similarly, over the past five years the Kentucky Board of Professional Engineers & Land Surveyors has issued approximately 750 reciprocal licenses per year– with only a 1.5 percent rate of denial for applicants that did not meet the educational or examination requirements. Reciprocal engineering and land surveying licensure takes less than two weeks, and initial engineering and land surveying licensure takes less than a week.

Both the Kentucky Board of Architects and the Kentucky Board of Professional Engineers & Land Surveyors rely on the support of national organizations – the National Council of Architectural Registration Board (NCARB) and the National Council of Examiners for Engineers and Surveyors (NCEES) – to compile and verify the credentials of interstate applicants. However, HB 343 would have placed this burden on our state's licensing boards. This is a task that they do not have the manpower for, which would likely result in much longer review periods than what candidates are currently experiencing, as well as higher fees.

In addition, the proposed legislation required that “*the person has held the occupational license or government certification in the issuing jurisdiction for at least one (1) year and is in good standing.*” This is an additional barrier where licensed architects, engineers and land surveyors currently applying for reciprocity in Kentucky may be registered immediately, even if the certification in their issuing jurisdiction occurred within the last 12 months.

Professional licensing is particularly important for professions such as architects and engineers, whose work impacts the health, safety, and welfare of the public and, as illustrated by the statistics above, our licensing boards already employ effective systems for reciprocity. HB 343 was therefore attempting to solve a problem that does not exist and would have created the unintended consequences of additional barriers to an already streamlined path for professionals seeking to practice. We appreciate your consideration, and we urge you to uphold these successful and efficient systems already in place.

Sincerely,



Cordelia Harbut
Executive Director
Kentucky Board of Architects



Kyle Elliott, PLS
Executive Director
KY Board of Professional Engineers & Land Surveyors



Kelly E. Ives, AIA, CAE, LEED AP
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