

AMERICAN PAYROLL ASSOCIATION

August 30, 2018

The Honorable Ryan Smith
Speaker of the House
Ohio House of Representatives
77 South High Street
14th Floor
Columbus, OH 43215

Re: Ohio S.B. 255, the Reform Occupational Licensing Act

Dear Speaker Ryan:

The American Payroll Association (APA) is concerned about the impacts of Ohio Senate Bill 255, the Reform Occupational Licensing Act, on our voluntary certification program. In current form, S.B. 255 will damage APA's vital program for payroll professionals working for employers that conduct business in Ohio.

APA recommends that the Ohio House of Representatives except private-sector voluntary programs, like APA's certification program, from S.B. 255, and include a government noncompete provision. In addition, the House should consider periodic review of licensing regulations without a presumption that the regulations or licensing board be kept or eliminated. This will allow a careful and balanced approach to protect state interests.

About APA and the Value of Payroll Certification

APA is a not-for-profit professional organization serving the interests of more than 21,000 payroll professionals nationwide, including more than 1,000 in Ohio. Since 1982, our goal has been to increase the job skills of payroll professionals through education and training. APA's Fundamental Payroll Certification and Certified Payroll Professional designations are voluntary and offer a means for individuals to show current and potential employers that they have the necessary skills to manage payroll and that they are maintaining that knowledge.

APA's program serves as a critical means of gaining employment and career advancement for many individuals, especially because U.S. institutions of higher education do not offer a degree in payroll management.

Impact of Senate Bill 255

Unfortunately, S.B. 255 calls for “state action” to “offer” governmental voluntary certification programs when there is “asymmetrical information between the seller and buyer.” Given that the private-sector already offers well-established and recognized voluntary professional certification opportunities, government-based programs in Ohio would be a waste of taxpayer money. There is no reason for government officials, who lack subject-matter expertise, to compete with established private-sector certification programs.

APA understands the Ohio legislature’s concerns about access to employment opportunities and to keep consumer pricing reasonable. However, S.B. 255 adopts the wrong approach to occupational licensing reform when it comes to voluntary certification programs. APA’s program is not a barrier to entry because it is voluntary and acts to increase economic opportunities for Ohio citizens. In addition, the program does not cause an increase in consumer pricing. Knowledgeable payroll professionals keep costs down because they help ensure that their employers are in compliance with wage and hour laws, tax withholding and information reporting, retirement and other fringe benefits management, wage withholding for child support, and more.

APA would be pleased to discuss its valuable certification program further with the Ohio House of Representatives. We urge you to carve out voluntary certification programs from S.B. 255 and consider occupational licensing on a case-by-case basis.

Sincerely,



Alice P. Jacobsohn, Esq.
Senior Manager, Government Relations



Rali Petrova
Certification Manager

Cc: House Government Accountability and Oversight Committee