



State of Vermont
Office of the Secretary of State
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Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
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February 14, 2024

To: Hon. Michael McCarthy, Chair
House Committee on Government Operations and Military Affairs

From: S. Lauren Hibbert, Deputy Secretary of State
Lauren Layman, General Counsel, Office of Professional Regulation

Re: H. 606 – An Act Relating to Professional Licensure and Immigration Status

Dear Committee,

Thank you for the opportunity to testify about H. 606, an act relating to professional licensure and immigration status.

The Secretary of State and the Office of Professional Regulation (OPR) are very supportive of this bill and its purposes. We have worked throughout the years to reduce barriers for people who obtained professional qualifications in other countries and to provide guidance on how to get professional licenses here in Vermont. H. 606 would be an excellent addition to and facilitator of our State's efforts to help all qualified people work in their chosen profession or occupation.

OPR has a couple of comments on H. 606. First, while we fully support not requiring a social security number for professional licensure, OPR would still like to ask for a social security number during the application process. A social security number is still the best way OPR has for identifying licensees. Identifying individual licensees is essential for enforcement and public protection. This is particularly true as the State adopts more interstate occupational licensing compacts and it becomes more challenging to identify the "Jane Smith" charged with unprofessional conduct out of all the "Jane Smiths" in the country who may have practiced in Vermont. It is OPR's understanding that the current language of H. 606 allows OPR to ask for a social security number during the application process as long as the social security number is not required for licensure.

Second, Vermont has adopted several interstate occupational licensing compacts, and is considering several others, that require applicants to have a social security number. When the State adopted the compact legislation, it adopted either a specific requirement that applicants have social security numbers, or it adopted statutory language that makes compact commission rules the law of Vermont. (In the latter instance, several compacts have adopted requirements in rule that require applicants to have social security numbers.) Unfortunately, if Vermont wishes to participate in the compacts, we cannot repeal just the social security number requirements, as compact legislative language must remain the same for

all states adopting the compact. To remain in compliance with these compacts, OPR recommends adding an exception to H. 606 for the purpose of issuing interstate occupational compact licenses.

H. 606 is an excellent proposal that OPR supports fully. We thank you for the opportunity to testify on the bill and look forward to helping in any way we can going forward.