



**From:** [Edward Timmons](#)  
**To:** [ST\\_RegulatoryCounsel](#)  
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I appreciate the opportunity to comment on the regulation of professionals licensed by the Board of Medicine in Pennsylvania. I am an associate professor of economics and director of the Knee Center for the Study of Occupational Regulation at West Virginia University. I am also a senior research fellow with the Archbridge Institute. This comment is not submitted on behalf of any party or interest group.

Pennsylvania can take an important step toward easing the burden many licensed professionals encounter when moving from state to state. Indeed, existing economic research has shown that occupational licensing can reduce migration by as much as 7%.<sup>1</sup>

The new rules proposed can help ease this burden. Of particular importance is the option for licensed workers from other states that lack "substantially equivalent" credentials to obtain a provisional license and begin working without unnecessary delay. It is correct that regionally, PA will be a leader with these new rules in place.

Moving beyond a regional comparison, however, it is worth noting that PA will still lag behind other states. One example would be Arizona. In 2019, Arizona passed legislation that accepted the licenses of other states-- so long as the licensee was in good standing-- without meeting a "substantially equivalent" standard. Since 2019, several other states like Idaho, Iowa, Missouri, and Mississippi have passed similar legislation.

Workers from other states may be dissuaded from moving to PA if they are permitted to work temporarily, but recognize that they will have to satisfy additional licensing requirements to be permitted to work in the future.

If other states have less restrictive requirements for licensing, and there is no evidence of harm to consumers in those states, it is worth reconsidering licensing requirements in PA and making sure that current regulations are striking the proper balance between consumer safety and ease of working and earning a living in the state.

There are no documented instances of harm to consumers from Arizona's reform in 2019. Instead, more than 4,600 licensed professionals (including medical professionals) have entered the state and began working.<sup>2</sup>

In summary, the proposed rules are an improvement for PA and do give the state a competitive advantage regionally. If the pool of comparison is broadened, however, to national leaders like Arizona, it is clear that Pennsylvania will continue to be placed at a competitive disadvantage. A reconsideration that properly weighs the costs and benefits of the "substantially equivalent" standard for licensing by endorsement is warranted.

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1: Janna E. Johnson and Morris M. Kleiner, "Is Occupational Licensing a Barrier to Interstate Migration?," *American Economic Journal: Economic Policy* 12, no. 3 (2020): 347–73.

2: <https://www.goldwaterinstitute.org/universalrecognition/>

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