



PROFESSIONAL CERTIFICATION COALITION

Agenda
PCC Member Strategy Call
Tuesday, October 21, 2025
1:00 pm ET

Steering Committee: I.C.E. (Denise Roosendaal), ASAE (Mary Kate Cunningham, Kyle Hayes)
Legal Counsel: Jerry Jacobs, Craig Saperstein, Julia Judish, Lori Panosyan, Laura Killalea, Jaria Martin (Pillsbury)

I. Welcome/Membership Updates

- a. Invoices for FY25-26
- b. Reminder: Password has changed for the For Members section of the website
- c. CAE Continuing Education Credit
 - i) The PCC Member Meeting has been approved for continuing education credit, which applies toward the ASAE CAE credential.

II. Discussion: Impact of Government Shutdown on Certification

- a. The federal government is currently in a shutdown, as Congress and the President have failed to enact any appropriations bill that collectively form the federal budget for FY 2026.
- b. A Continuing Resolution (CR) serves as a stopgap funding measure to keep agencies operating at current funding levels.
 - i) Because neither a CR nor individual appropriations bills have been passed, the government remains shutdown.
- c. Underlying Stalemate
 - i) Republicans lack the number of votes needed to pass a CR in the Senate.
 - ii) Democrats have declined to provide votes for government funding without action on

expiring premium tax credits under the Affordable Care Act (ACA).

iii) ACA premium tax credits are set to expire at the end of the year, which would increase healthcare costs for individuals relying on ACA coverage.

(1) Democrats view this as a point of leverage, while Republicans prefer to negotiate after government reopens.

(2) Democrats have also expressed concern that the Administration may not respect congressional intent regarding spending authority once funds are appropriated.

iv) The Administration has previously tested legal precedent by declining to spend appropriated funds, spending unappropriated funds, and rescinding appropriated funds.

(1) As a result, there is limited trust that, if Democrats provide votes to advance the bill, the Administration will adhere to congressional intent.

v) The larger political dynamic suggests entrenched positions on both sides, reducing prospects for near-term resolution.

d. Operational Effects:

i) Given the government shutdown, federal employees have been furloughed.

ii) The Office of Management and Budget (OMB) has cancelled projects, primarily in blue states/Democrats districts as a pressure tactic.

iii) Several agencies have implemented reductions in force, impairing their ability to carry out actions of the agency.

e. Impact on Certification

i) Direct federal funding through contracts or grants may be paused due to the lack of funding.

(1) Federal courts remain operational but are prioritizing criminal trials, delaying civil litigation

ii) Indirect impacts of the government shutdown include disruption for subject matter

experts and constituencies employed by, or dependent on federal funding.

iii) Furloughs and related economic strains may limit individuals' ability to obtain or maintain certifications.

iv) The broader certification community may experience downstream economic ripple effects.

f. Political Outlook

i) At this time, there is not a visible off ramp, and the duration of the shutdown remains uncertain.

(1) Both parties believe they are achieving their respective objectives, and the end date of the shutdown is a moving target.

ii) ASAE is tracking the shutdown's impact on the association community and nonprofit organizations (e.g. grants, technical assistance, etc.) via a [survey](#) for members.

III. Update on Efforts to Influence Implementation of Freedom to Invest in Tomorrow's

Workforce Act ([26 U.S. Code § 529\(f\)](#))

a. The PCC's goal is to influence how the IRS uses its discretion in implementing the statute.

b. The PCC is preparing a letter and draft Notice (a guidance document that IRS could publish)

i) In the draft Notice, the PCC has offered guidance on identifying credible credentials.

ii) The draft Notice specifically highlights credentials accredited by a profession-specific accreditation body, encompassing many PCC members.

c. The draft Notice proposes that the IRS:

i) Use specific factors to identify qualifying credentials;

ii) Publish a list of credentials that meet these standards; and

iii) Provide clarity for taxpayers seeking eligible programs.

d. The letter and draft Notice will be shared with members once they are finalized. The PCC will also brief congressional allies on this effort.

- e. The timeline for action by the IRS will likely be delayed due to the government shutdown.

IV. Update on Response to Burning Glass Institute Report

- a. ASAE is collecting feedback on the Burning Glass index and other issues through a survey available [here](#).
 - i) I.C.E. is also collecting data to verify the accuracy of credentials, available [here](#).
- b. The underlying data informing recent studies are inaccurate, and staff on the Hill appear to accept them. The PCC seeks to correct the record and avoid adverse policy implications by being proactive.

V. Update on Credential Integrity Action Alliance (CIAA) Model Legislation on Commercial Cheating

- a. The CIAA is developing model legislation targeting state-level efforts to address commercial cheating services.
 - i) Early versions enacted in Georgia were limited in scope; Version 2.0 is under development to strengthen provisions.
 - ii) These efforts demonstrate how federal legislation can serve as a framework for related state and future federal initiatives.
- b. The CIAA generally sought guidance from the PCC with respect to the latest version of its model legislation and PCC attorneys reviewed and proposed revisions to the latest draft.
- c. Specifically, we shared with CIAA the definition of “recognized postsecondary credentials” under federal law – as drafted by the PCC in the now enacted Freedom to Invest in Tomorrow’s Workforce Act – to serve as a reference point for federal and state use.

VI. Questions