

Agenda
PCC Member Strategy Call
Friday, December 12, 2025
12:00 pm ET

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

1) Welcome/Membership Updates

- a) Welcome and good to see everyone.
- b) As a reminder, invoices for the second half of the Fiscal Year will be sent in January.

2) Guest Presentation: Credential Integrity Action Alliance (CIAA) Model Legislation – Noah Reandeau, President of Model Solutions

- a) Overview of the CIAA
 - i) The CIAA promotes initiatives and lobbies for legislative and policy changes that prevent commercial cheating and cheating-for-hire services from undermining academic and credential integrity.
 - ii) The CIAA's members include universities, licensure and certification authorities, service partners, and individuals dedicated to promoting integrity.
- b) Overview of the Model Legislation
 - i) Noah Reandeau has helped design model legislation, which, among other things, creates a cause of action to combat commercial cheating.
 - ii) The model legislation also includes language addressing commercial cheating as it relates to certification exams.
 - iii) A version of the model legislation was adopted and signed into law in Georgia, and the model legislation has been introduced in Missouri.
- c) PCC Collaboration and Engagement Opportunities:
 - i) The PCC has worked with Noah Reandeau and the CIAA to ensure that the legislation sufficiently addresses certification exams and commercial licensing. The new model legislation also benefits from referencing the definitions of *recognized postsecondary credentials* and *recognized postsecondary credential programs* in new Section 529(f) of the Internal Revenue Code. This is an ongoing effort, and the PCC looks forward to continuing collaboration.

3) Federal Update

- a) Implementation of *Freedom to Invest in Tomorrow's Workforce Act*
 - i) As a reminder, the IRS is working with the Department of Treasury to issue guidance implementing the Act, including identifying other reputable postsecondary credentialing programs for which 529 plans funds can be used.
 - ii) The PCC is engaging with the IRS and Treasury Department, including through in-person meetings, a written letter, and a draft notice that focuses on ensuring that any program that is not automatically eligible under any of the categories listed in statute.

- b) **New Initiative: Uniform standards for credentialing assistance for military service members and veterans.**
 - i) We were recently approached by a training organization engaged in PMI certification trainings, and an individual within that organization who is putting together legislative language that would create a unified, standardized credential benefit across military services.
 - ii) As it stands, some services have limited benefits for credentialing, others are more robust. The idea behind this language is to provide a unified credentialing benefit that is also subject to quality control.
 - iii) There are two potential legislative vehicles for this proposal: (i) the Defense Appropriations bill, or (ii) the National Defense Authorization Act (or “NDAA”). The process for including language in either begins in 2026. So, we’re beginning the process of finding members of Congress to champion the bill, get the relevant committee staff up to speed, and generally raise awareness and support.
 - iv) We will keep you updated on these efforts and consider ways to involve interested and impacted PCC members.

4) State Legislative Update

- a) We continue to monitor pre-filed legislation relevant to the PCC. We don’t have anything notable to report on today, but we expect to have substantive updates and reports come January when state legislative sessions resume.

5) Questions & Conclusion