

February 13, 2025

Rep. Chris Erwin
Rep. Carmen Rice
220-B State Capitol
Atlanta, GA 30334

Re: Opposition to House Bill 663 – Quality Basic Education Act; Low-Wealth Capital Outlay Grants

Dear Chair Erwin and Vice Chair Rice:

On behalf of the International Institute of Building Enclosure Consultants (IIBEC), an association of design professionals specializing in building enclosure projects, I am writing to respectfully express my concern regarding Bill H. *Quality Basic Education Act; Low-Wealth Capital Outlay Grants*.

IIBEC is an international association representing 3,900 professionals who specialize in roofing, waterproofing, exterior wall design, and building enclosure commissioning. Our members advocate for building owners to ensure projects comply with codes, standards, warranties, and performance requirements.

Public entities often use cooperative purchase agreements to procure goods and services, achieving cost savings through volume discounts and reduced administrative effort. While these programs have traditionally applied to commodities such as office supplies, extending them to architectural and engineering design and oversight services presents significant risks.

IIBEC conducted a study, the *Foundation Unit Price Procurement Report*¹, which demonstrates that procurement methods focused primarily on price, such as cooperative purchasing, can undermine professional oversight, discourage comprehensive design, and increase the likelihood of building enclosure performance issues.

Schools and other public facilities rely on qualified professionals to ensure roofing systems are designed and installed in accordance with performance standards, local codes, and long-term durability requirements. Tying funding eligibility to a single supplier using a proprietary specification could inadvertently incentivize decisions based on cost rather than competence, potentially compromising building safety, performance, and taxpayer value.

¹ [Foundation-Unit-Price-Procurement-Report.pdf](#)

The study found that the unit-price approach, particularly within cooperative purchasing arrangements, introduces opportunities for abuse during the prequalification, design, and construction phases. Of particular concern are the following issues:

- **National Pricing Practices:** Current national pricing practices do not incorporate competitive bidding for public projects, which can lead to overspending and potential cost overruns.
- **Building Code Inconsistency:** In many locations, building codes do not fully prevent inappropriate specifications, overpricing, or improper installation. Updated guidance is needed to close these gaps and protect the public.
- **Access in Qualification:** Cooperative purchasing groups increasingly emphasize price and familiarity with the owner organization rather than vendor qualifications. Greater oversight is needed to ensure equitable access for all potential vendors.
- **Independent and Professional Oversight:** Instances were observed where independent or professional oversight was not included in projects. Building regulations should be strengthened to better protect the public against projects that bypass critical life-safety protections.

For these reasons, IIBEC respectfully urges the Committee not to support H.B. 663 as it encourages cooperative purchasing for roofing projects and instead prioritize safety, quality, and long-term performance in all school construction and capital outlay initiatives.

Thank you for the opportunity to provide input on this important matter and for your continued service to the citizens of Georgia. Please do not hesitate to contact us if additional information or technical expertise would be helpful as you continue your deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian", with a stylized flourish at the end.

Brian Pallasch, CAE
Executive Vice President & CEO