

April 16, 2026

Representative Jonathan Patterson  
MO House of Representatives  
201 West Capital Ave., Room 308  
Jefferson City, MO 65101

Re: House Bill 2474

Dear Speaker Patterson,

On behalf of the International Institute of Building Enclosure Consultants (IIBEC), I am writing to respectfully express our concern regarding H.B. 2474, which proposes changes to existing law related to cooperative and group discount purchasing within state procurement processes.

This bill was recently amended in committee to allow the commissioner of administration to “participate in, sponsor, conduct, or administer a cooperative purchasing agreement with a contract established by a nonprofit entity whose membership is exclusively made up of governmental entities and whose governing body is selected or elected exclusively by governmental entities, and where the contract was established in accordance with the laws and regulations applicable to the governmental entities. Such cooperative purchasing agreements may be utilized for the purchase of supplies, including, but not limited to, the upkeep and maintenance of physical infrastructure.”

IIBEC is concerned that this change could negatively impact the quality and performance of building enclosure systems by bypassing project-specific evaluation and the use of qualified, credentialed professionals. IIBEC respectfully requests consideration of an amendment to exclude engineering and architectural services, as well as building enclosure materials and equipment, from these provisions.

IIBEC represents approximately 3,900 professionals specializing in roofing, waterproofing, exterior wall design, and building enclosure commissioning. Our members provide critical oversight to help ensure that public and private building projects comply with applicable codes, standards, warranties, and long-term performance requirements.

From IIBEC’s perspective, H.B. 2474 raises significant concerns because the cooperative procurement process may result in higher long-term costs and frequently exclude independent design professionals. Failing to engage a qualified and independent design professional can result in a construction project that fails to meet the performance needs of the building.

While cooperative purchasing agreements may sometimes save costs for commodities, applying it to architectural and engineering design and project materials presents risks. Roofing systems are complex, building-specific assemblies that require careful evaluation of existing conditions, climate exposure, structural capacity, code compliance, and long-term maintenance requirements. Treating these projects as interchangeable commodities threatens building safety, performance, and responsible stewardship of public funds.

For a roofing project procured through a cooperative purchasing agreement, the roof system manufacturer often acts as the designer, creating specifications tied to products purchased through the cooperative

agency. This creates a conflict of interest because it is in the manufacturer's financial interest to specify products that generate revenue for them. Research, including the RCI-IIBEC Foundation report, *An Analysis of Unit Price Procurement*,<sup>1</sup> indicates that cost-driven procurement approaches can undermine professional judgment and limit competition. This lack of competition frequently leads to increased costs for the taxpayers.

Taxpayer-funded procurement should promote open competition, transparency, best value, and opportunities for local, small, and disadvantaged businesses, but often falls short.

Specific risks associated with this approach include:

- National Pricing Practices: Current pricing systems often bypass competitive bidding, increasing the potential for overspending and cost overruns.
- Building Code Gaps: Many local codes do not fully prevent inappropriate specifications, overpricing, or poor installation, leaving public buildings vulnerable.
- Limited Access and Qualifications: Cooperative purchasing arrangements may favor familiarity or price over professional qualifications, reducing equitable access and oversight.
- Absence of Independent Oversight: Projects without independent review bypass critical life-safety protections, increasing the risk of failures and costly repairs.

In the end, taxpayer-funded procurement should ensure a few basic principles:

1. Preserve and enhance open and fair competition.
2. Provide public transparency.
3. Reduce costs by achieving best value solutions for the taxpayers; and
4. Expand job opportunities, especially for local, small and disadvantaged businesses.

Cooperative procurement delivers on none of these four points. There is no greater example of the failed promises of cooperative procurement than in education funding. State legislatures are constantly debating school funding and teacher pay, but where school construction is governed by cooperative purchasing, the construction costs are often higher, diverting critical funds from classrooms and teacher compensation.

Multiple state audit reports examining cooperative procurement in school construction and other public projects have found higher project costs and reduced contractor diversity. IIBEC would be pleased to provide these reports to the committee.

For these reasons, IIBEC respectfully urges that H.B. 2474 be amended to exclude engineering and architectural services, as well as building enclosure materials and equipment, from these provisions. Thank you for the opportunity to share our perspective on this important issue. IIBEC stands ready to provide additional technical expertise in support of sound public procurement policy.

Sincerely,



Brian Pallasch, CAE  
Executive Vice President & CEO

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<sup>1</sup> [Foundation-Unit-Price-Procurement-Report.pdf](#)