



September 9, 2014

The Honorable Sam Graves, Chairman  
House Committee on Small Business  
2361 Rayburn House Office Building  
Washington, DC 20515

Dear Mr. Chairman:

The Council on Federal Procurement of Architectural & Engineering Services (COFPAES) ([www.cofpaes.org](http://www.cofpaes.org)) has, for more than 40 years, been the nation's advocate for qualifications based selection (QBS) for professional architecture-engineering (A/E) and related services. Our members are the American Institute of Architects (AIA), American Society of Civil Engineers (ASCE), National Society of Professional Engineers (NSPE), National Society of Professional Surveyors (NSPS) and the Management Association for Private Photogrammetric Surveyors (MAPPS). COFPAES continues to serve the American public as a well-known and respected forum for the consideration of policy and operational changes in the selection procedures for design professionals. Because of its emphasis on professionalism in the procurement process, COFPAES assists the federal government in assuring that the design of projects to satisfy the building, infrastructure, resource and program management needs of our Nation are conducted in an efficient and quality manner.

COFPAES is keenly interested in your recent hearings regarding the barriers to entrepreneurship caused by occupational licensing, as well as your request of the Office of Advocacy in the Small Business Administration to conduct a study of the economic impact of such licensing.

As you conduct your examination of licensing that may stifle job creation for small businesses, we urge your continued understanding for the longstanding and important role professional licensing played with regard to practitioners in the architecture, engineering, surveying and mapping field.

Licensing of A/E professionals is critical to public health, welfare, and safety. All 50 states (and the territories) license the design professions, including your home state of Missouri. Licensing in architecture began in 1897 and in engineering and surveying in 1907. It is important to note that licensing of A/E practitioners is not uniquely American, as similar programs are in place in numerous nations around the world. This demonstrates the longstanding importance of a system for assuring the public that practitioners have met the requisite education, experience, and examination to engage in professional practice.

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A poorly designed dam can burst, resulting in loss of life, destruction of property, and serious litigation and liability claims. Moreover, a poorly planned or executed survey can unleash a flood of problems, creating an impediment to the expeditious completion of a project, causing substantial loss of time and money, and jeopardizing the public safety. A well-made dam, as well as a high quality survey or map, will stand the test of time and will ensure that the a project can proceed with its design, construction or resource planning project based on complete and precise groundwork. The standards for licensure of professionals in architecture, engineering, surveying and mapping provides a foundation of public assurance that only individuals who have met certain experience, education and competency requirements can engage in services that have a significant impact on public health, safety and welfare.

While some licensing schemes in other occupations may lack rationale, we respectfully urge your continued recognition, understanding and support for the licensing of professionals in the A/E community.

COFPAES looks forward to working with the Committee on Small Business to assure that licensing of professionals in the A/E community continues to serve the public interest. Please do not hesitate to contact us if we can be of any assistance to your investigation.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Palatiello". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John M. Palatiello  
Administrator

cc: Winslow Sargeant, SBA, Chief Counsel for Advocacy