

June 3, 2026

The Honorable Scott Bessent
Secretary of the Treasury & Acting Commissioner of the Internal Revenue Service

Edward Killen
Commissioner, Tax Exempt and Government Entities

Re: Implementation of Section 740414 of H.R. 1 - Expansion of Qualified Postsecondary
Credentialing Expenses under Section 529 of the Internal Revenue Code

Dear Secretary Bessent and Commissioner Killen:

On behalf of the members of the Building Owners and Managers Association (BOMA) International, I urge you to prioritize implementation of Section 740414 of H.R. 1 (The One Big Beautiful Bill Act), which would expand the use of 529 plans to cover qualified postsecondary credentialing expenses. This change would allow professionals at all stages of their careers to invest in education that aligns directly with workforce needs and employer expectations.

The recent federal focus on addressing skilled workforce shortages, expanding apprenticeships, and advancing skills-based hiring and alternative credentials, including through Executive Order 14170, strongly reflects the realities of today's labor market. In commercial real estate particularly, many professionals enter the industry through nontraditional pathways and advance into roles with significant operational, financial, and compliance responsibilities while continuing to work full time. At the same time, our industry faces persistent talent shortages and the loss of experienced professionals through retirement. As a result, employers increasingly need education and credentialing pathways that allow employees to build practical skills quickly, in real time, and in formats that can be pursued alongside full-time work.

Implementation of Section 740414 to support credentialing programs will expand access to workforce-relevant education and credentials in a sector facing these ongoing talent challenges. In commercial real estate, key competencies related to building operations, energy performance, asset management, risk mitigation, and regulatory compliance are often developed through applied, role-based training rather than traditional degree pathways alone. These types of programs accelerate time-to-competency and support stronger alignment between employee capabilities and employer needs.

Reputable professional credential programs are designed to ensure that learning translates into measurable, on-the-job performance. They incorporate defined competency models, structured coursework, and assessments aligned to real-world responsibilities. Traditionally, subject matter experts who are active industry practitioners contribute to curriculum development and ongoing updates, ensuring content remains relevant in a rapidly evolving operating environment.

Assessment methodologies are also an important feature of qualified credentialing programs. These programs frequently utilize structured evaluation processes, including competency-based exams or other validation mechanisms, to ensure that participants demonstrate understanding and

application of the material. Such approaches support consistency, reliability, and alignment with recognized standards of professional performance.

Additionally, credentialing programs often include ongoing professional development expectations to maintain active status, as well as adherence to established codes of ethics and professional conduct. These elements ensure that learning remains current and continues to evolve alongside industry practices.

Flexible delivery formats are another key characteristic. Programs are frequently offered through a mix of online, virtual, and in-person formats, allowing working professionals to pursue education while balancing full-time employment and other responsibilities. This flexibility significantly expands access to individuals who may not be able to participate in traditional classroom-based degree programs.

By way of background, the commercial real estate industry includes educational organizations that provide credentialing pathways aligned to these characteristics. For example, BOMI, a 501(c)(3) educational organization and controlled affiliate of BOMA International, offers credentials that reflect competency-based design, structured assessments, and flexible delivery formats similar to those described above. These types of programs illustrate how working professionals build practical skills that can be applied directly in their roles.

As Treasury and the Internal Revenue Service consider implementation of Section 740414, BOMA International urges an approach that recognizes the broad range of postsecondary credentialing pathways relied upon by working professionals and employers. Consideration of program characteristics such as alignment with workforce needs, validated assessment processes, regularly updated content, and measurable skill development may help ensure that expanded eligibility achieves its intended impact.

We are concerned that overly restrictive eligibility criteria, including an approach that effectively prioritizes only degree-granting providers, could unintentionally exclude high-quality, industry-validated credentialing programs. Such an outcome would limit access for working professionals who rely on flexible, nontraditional education pathways to advance their careers while remaining in the workforce. A more inclusive framework would better support skills-based learning, workforce development, and economic competitiveness across industries.

We appreciate your attention to this matter and your broader efforts related to workforce development and education policy. BOMA International would welcome the opportunity to provide additional industry context if it would be helpful as implementation moves forward.

If we can be of any assistance, please do not hesitate to contact me.

Sincerely,

Mary Lue Peck
President & COO
BOMA International