

July 30, 2013

The Honorable Tom Harkin  
Chairman  
Committee on Health, Education,  
Labor and Pensions  
United States Senate  
Washington, DC 20510

The Honorable Lamar Alexander  
Ranking Minority Member  
Committee on Health, Education,  
Labor and Pensions  
United States Senate  
Washington, DC 20510

The Honorable Patty Murray  
Committee on Health, Education,  
Labor and Pensions  
United States Senate  
Washington, DC 20510

The Honorable Johnny Isakson  
Ranking Minority Member  
Subcommittee on Employment and  
Workplace Safety  
Washington, DC 20510

Dear Senators Harkin, Alexander, Murray, and Isakson:

On behalf of the American Association of Community Colleges (AACCT) and the Association of Community College Trustees (ACCT), we are pleased to write in regards to S. 1356, the Workforce Investment Act of 2013. WIA is one of our associations' top legislative priorities, which is why we are staunch advocates of reauthorizing this important legislation.

WIA reauthorization is vitally important for the nation's workers and economy. We applaud the committee on its bipartisan effort to introduce and consider this legislation. As this legislation moves forward, we hope that the bipartisanship that has enabled the bill's introduction will allow the bill to move to the Senate floor and beyond.

Throughout this reauthorization process, the overarching theme of the feedback we have received from our member institutions is that they often feel like vendors in a system in which they should be true partners. With nearly 1,200 institutions, community colleges enroll just under half of the nation's undergraduates. Additionally, they provide substantial amounts of training for industry certifications, as well as adult basic education, and customized training for the nation's businesses. Our institutions are the closest thing the country has to a ubiquitous, nationwide network of low-cost, high-quality postsecondary education and training providers. Furthermore, as public institutions that, on average, receive nearly 60% of their revenues from state and local support, and receive substantial funds through other federal programs such as the Carl D. Perkins Act and the TAA Community College and Career Training Program, community colleges represent a substantial investment of public resources that the workforce system should engage with and leverage to the greatest extent possible.

We are pleased to see many elements of this bill align with our priorities for reauthorization. Community colleges strongly support the steps that have been taken in this legislation to align the various components of the workforce system and refocus their efforts on the attainment of postsecondary credentials. This includes common performance indicators across programs, and

modifications to those indicators that better count those in longer-term training programs. Additionally, the bill places a greater emphasis on the transition to postsecondary education in the Adult Education and Family Literacy Act, and includes numerous provisions calling for integrated delivery of basic skills and occupational instruction. Additionally, we were pleased to see the authorization of the Community-Based Job Training Grants and a provision allowing local areas increased flexibility to contract with institutions of higher education. These are two provisions that AACC and ACCT have long supported.

As the process moves forward, we look forward to working with the committee to modify the bill in other ways that would make community colleges a stronger partner in the workforce system. One important way to accomplish this is to ensure that community colleges have a presence on state and local workforce development boards. We hope to work with the committee to strengthen the bill's language in this area.

We are concerned with the evolution of the provisions dealing with the eligible training provider performance reports and eligibility to participate in the system. Providing employment and earnings information for all participants in our training programs can be tremendously difficult for our institutions, as they often do not have access to wage records and other data necessary to provide this information. This is a question of ability, not of willingness, as community colleges support transparency of information for WIA participants that are choosing a training provider. We are pleased that committee staff has indicated they are open to continued improvement of these provisions so that these requirements do not discourage greater community college participation in the system.

As representatives of at least one mandatory partner, and in many cases two or more, community colleges remain concerned about the state mechanism for one-stop infrastructure funding. We realize the need for the coordination at the local level that this mechanism is intended to improve, and appreciate the cap and other provisions that would limit the impact on partner programs, but, like the WIA programs, these partner programs have also suffered reductions in funding. There are also many outstanding questions that remain regarding how this mechanism would operate.

We appreciate this opportunity to comment on this vital legislation, and look forward to working with you as the legislation progresses.

Sincerely,



Walter G. Bumphus  
AACC President and CEO



J. Noah Brown  
ACCT President and CEO