



April 29, 2021

The Honorable Patty Murray
U.S. Senate
154 Russell Senate Office Building
Washington, DC 20510

The Honorable Richard Burr
U.S. Senate
217 Russell Senate Office Building
Washington, DC 20510

Dear Senate HELP Committee Chair Murray and Ranking Member Burr:

On behalf of the nation's 1,044 community colleges, the American Association of Community Colleges (AACC) and the Association of Community College Trustees write to share workforce development policy proposals per the HELP Committee's request.

As you know, our economy has suffered tremendously because of COVID-19. More than 15 million workers are unemployed and the economy has lost nearly 10 million jobs since the pandemic started. While some of these jobs will return when the pandemic is finally controlled, many others are gone permanently, leaving millions of workers in need of education and training that leads to other opportunities.

Community colleges stand ready to help the economy recover and modernize by making high-quality education and training aligned with industry needs available to all individuals and hope to be more fully integrated into the federal workforce system. They are also committed to an outcomes-focused orientation that ensures that funds are spent prudently.

As the Committee works to craft legislation that will support and expand workforce training programs and encourage innovation, we appreciate your consideration of the following proposals.

Authorize a Community College-Led Job Training Program

Community colleges are designed to offer the education and training programs needed by business and industry. Although they do this on a regular basis, limited only by funding availability, this responsibility is particularly critical in times of economic difficulty and transition such as the nation is now experiencing. In recognition of this essential role, during the last severe economic downturn in 2009, Congress authorized the Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant program, which provided \$1.9 billion in grants over four years to community colleges. The program resulted in more than 500,000 students enrolling in postsecondary programs. More than 300,000 postsecondary credentials were earned and 2,700 new or redesigned programs were implemented.

To help community colleges replicate successes of the TAACCCT grant program and respond to the needs of today's students and workers, any future comprehensive workforce development legislation should include a community college-led job training initiative. We applaud the \$2 billion Community College and Industry Partnership Grants in the Relaunching America's Workforce Act—led by Chair Murray in the Senate—and support the incorporation of a similar program in future bipartisan workforce legislation.



We ask that the program place an emphasis on community college-led partnerships and that funding is structured so that it can be aligned with other state and local workforce initiatives, including Perkins Career and Technical Education (CTE) and Workforce Innovation and Opportunity Act (WIOA) state plans. Additionally, we recommend the program focus on the attainment of industry-recognized credentials and employment and earnings outcomes, regardless of whether the college programs are credit or non-credit. The program should also allow a percentage of grant funds to be used for tuition support for program enrollees. A full list of desired elements of such a program, many of which are already reflected in RAWA and other legislation, is attached.

Extend Federal Financial Aid Eligibility to Students and Workers Enrolled in Short-Term Programs

As the nation moves towards a recovery, ensuring access to a variety of postsecondary pathways will be critical to the economic success of students and workers. Under current law, most postsecondary programs that are less than 600 clock hours over 15 weeks of instruction are ineligible for federal financial aid, putting these programs out of reach for many potential students who are financially disadvantaged.

The bipartisan JOBS Act (S.864, H.R. 2037) aims to rectify this by extending Pell grant eligibility to students enrolled in qualifying short-term programs. Community colleges wholeheartedly support the JOBS Act and consider it ever-more urgent as the nation moves towards a post-pandemic recovery. We ask that you consider including the principles of the JOBS Act in any future comprehensive workforce development legislation.

Establish Education and Training Innovation Funds at the Departments of Labor and Education

Community colleges are constantly innovating to increase student access and success in education and training programs. In the face of the COVID-19 pandemic, this innovation has become even more crucial to enable students to continue to access hands-on skills training, academic instruction and vital support services, while safely distancing. As the nation recovers economically, innovative practices and learning models will become key to high-quality skills instruction and helping individuals succeed on their postsecondary pathways.

Accordingly, we recommend the creation of two Education and Training Innovation Funds—one administered by the Employment and Training Administration (ETA) within the Department of Labor (DOL), and the other administered by the Office of Career, Technical and Adult Education (OCTAE) within the Department of Education (ED). Both should allocate competitive grants to education and training providers or a consortium of providers, and reward cross-system collaboration, innovative learning models and evidence-based practices.

By establishing innovation funds at ETA and OCTAE, Congress can encourage innovative delivery models for a wide variety of education and workforce programs, including apprenticeships, Workforce Innovation and Opportunity Act (WIOA) programs and reentry services as well as adult education and literacy and career and technical education. All these programs will play a key role in serving individuals impacted by the COVID-19 pandemic.

To best leverage Innovation Fund grants and ensure equity, we recommend establishing a set-aside for small and mid-sized community colleges, including those located in rural or remote areas. While these institutions provide vital education and training resources to their communities, they often are unfairly disadvantaged in competitive grant funding due to the scale of their service populations.



Create a Grant Program to Train Displaced Workers for Jobs in In-Demand Industries

The many sectors that lacked qualified workers prior to the pandemic now often face even more significant skills gaps. In the healthcare industry, the number of nurses leaving the workforce grew from nearly 40,000 in 2010 to 80,000 in 2020 and shortages of allied healthcare workers continue to impact patient care. In this context, we note the serious and counterproductive lack of support by the federal government of associate degree nursing programs. By 2030, the World Health Organization projects a worldwide workforce shortfall of about 18 million health-care workers, with serious consequences for patients and communities.

Other industries that will be critical to our nation's recovery are also facing heightened skilled worker deficits, including manufacturing, construction, and technology. These industries will play a critical role in creating a modern infrastructure, which includes wind turbines, solar power and internet hardware in addition to highways, airports, railways and water systems.

In light of this, we recommend the creation of a program within the Department of Labor that authorizes grants to support the retraining of displaced workers for jobs in industries with proven worker shortages. Displaced workers should include individuals who lost their jobs due to the pandemic as well as those unlikely to return to their previous industry or occupation.

Given community colleges' historical role in administering employer-aligned training programs, grants should be provided to community colleges in partnership with local workforce entities. Grant funding should be used to create or expand existing industry-specific training programs, provide supportive services for program participants, and purchase equipment necessary for training. Priority should be given to applicants that can provide training services to individuals in rural, remote and other underserved areas.

Bolster Community College Involvement in the Workforce Development System

AACC and ACCT look forward to working with the committee as it reauthorizes WIOA to make changes to the statute that facilitate greater coordination between community colleges and the workforce development system. In many places, that relationship is extremely productive and functions well. In others, statutory improvements would help to improve operations at the state and local level.

Community colleges support changes to the eligible training provider list that recognize that not all training providers are created equal. The act already does this by affording special status to registered apprenticeship programs, which are subject to rigorous standards and oversight. Similarly, programs offered by public institutions of higher education are subject to institutional and (often) state approval requirements and are overseen by accreditors as well as relevant governmental bodies. Significant public resources have been expended to create and operate these programs, and the WIOA system should prioritize their use to best leverage this investment. Ideally, programs offered by public institutions of higher education would be considered automatically eligible for initial placement on the eligible providers list. These programs, like any others, would be subject to removal from the list based on poor performance. They would also furnish the same information as other providers so that prospective WIOA enrollees are able to make an informed choice.

The next iteration of WIOA should also firmly establish the community college role in helping to lead the system at the state and local levels. Under WIOA, community college leaders are eligible to be, and often are, members of state and local workforce development boards. Community college membership on these boards should be mandatory in the reauthorized bill.



Strengthen Federal Apprenticeship Policies

Community colleges are encouraged by the passage of the National Apprenticeship Act of 2021 in the House, as it maintains the core elements of registered apprenticeships while also taking steps to align them with other facets of the nation's workforce development system. We support the legislation's push for greater coordination at the federal level and the emphasis on expanding apprenticeships to non-traditional occupations as well as populations that are currently underrepresented in apprenticeships. The House bill gives the Senate a foundation on which to develop its priorities.

As the HELP Committee shapes apprenticeship legislation, we encourage maximum flexibility when it comes to the structure of registered apprenticeships. More specifically, flexibility should be maintained, as in current regulations, for competency-based and hybrid competency/seat time programs, provided they otherwise meet apprenticeship standards. We also encourage the formal establishment of credit for prior learning with appropriate quality safeguards.

Additionally, the House-passed National Apprenticeship Act established an apprenticeship modernization grant program to encourage the creation and expansion of apprenticeship activities. Should the Committee incorporate a similar grant program in its legislation, we ask that permissible uses of grant funding include support for student expenses, including tuition, equipment and supportive services and the improvement of apprenticeship and pre-apprenticeship programs for active-duty military and incarcerated individuals. In addition to these recommendations, we have attached several other suggested changes to H.R. 447 to improve the bill's already substantial focus on the alignment between apprenticeship and higher education programs.

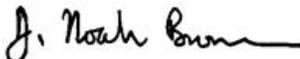
We sincerely appreciate your attention to these proposals to improve workforce development services for students and workers—particularly those adversely impacted by the COVID-19 pandemic. Our colleges anticipate serving the evolving economy, consistent with their longstanding commitment to students access and success, enabling more Americans to achieve family-sustaining wages. The Committee has a great opportunity to help ensure this outcome.

Sincerely,

Walter G. Bumphus, Ph.D.


President and CEO, AACC

J. Noah Brown


President and CEO, ACCT

AACC/ACCT Recommendations for a Community College Led Workforce Development Program

- **Continued Emphasis on Community College-Led Partnerships:** TAACCCT helped community colleges build new and strengthen existing relationships with several partners, particularly industry. Any new program should put college-industry partnerships at the forefront, while also encouraging other strategic partnerships. These may include local educational agencies, baccalaureate granting institutions, multiple-institution consortia (geographic, industry-driven, etc.), federal, state, and local workforce development systems, economic development agencies, and other organizations. Community colleges or consortia thereof, or state community college systems, would serve as the fiscal agent for all grants. The law should help ensure that small and rural institutions can access the grants.
- **Grants Should Be Well Aligned with Other Programs:** Grant applications should demonstrate how proposed projects align with other state and local workforce initiatives, including Perkins CTE and Workforce Innovation and Opportunity Act (WIOA) state plans. Potential grantees should be required to submit a labor market needs analysis, including those undertaken for Carl Perkins Act local funding, to support their proposals. Accountability requirements must be aligned with WIOA's uniform performance standards.
- **Grants of Appropriate Size to Make a Real Impact:** Grants should be sufficiently large to enable colleges to make at-scale innovations and investments in workforce education programs and infrastructure. However, any minimum grant sizes must reflect the size of the consortium or individual institution, allowing for smaller grants that will nonetheless enable small colleges to make significant program improvements. Similarly, any expectations as to number of participants served, credentials awarded, number of people placed in jobs, earnings gains, etc., must also be carefully tailored to the grantee's circumstances.
- **Avoid Burdensome Requirements That Will Discourage Grant Applications:** Many colleges found some of the extensive and exacting requirements for TAACCCT applications unnecessary. The grants themselves required substantial and in some cases unprecedented reporting, evaluation and other requirements. A new program needs to balance the government's legitimate interest in the effective use of tax dollars and grantees' ability to devote the bulk of funding to program development and delivery, rather than compliance. Evaluation requirements should be focused on the essential nature of these programs.
- **Specific Role for State Community College System Offices:** State community college system offices, given their unique ability to coordinate the efforts of multiple institutions, should be eligible to be lead grantees. This was not the case in the TAACCCT program.
- **Support for Students:** Community colleges often have difficulty attracting students to workforce programs, even those that lead immediately to high-paying jobs. This is often due to the high cost of technical training programs. Therefore, institutions should be able to use a limited percentage of grant funds to help defray student costs.
- **Emphasis on Innovation and Capacity Expansion:** A new program would ideally combine elements of the TAACCCT program's emphasis on innovation (e.g., competency-based education, distance learning, rigorous program evaluation) and the Community-Based Job Training Grants (CBJTG's) support for both innovative approaches and the expansion of strategies that are already working. Also, one great benefit of the TAACCCT program was its emphasis on expanding community college capacity, which any successor program should emphasize.
- **Aid with Data Matching:** Many community colleges still cannot obtain employment and earnings information from state or other public sources. Any new grant should enable provide grantees to obtain this information through the DOL or from the Social Security Administration (SSA) via the DOL.



- **Flexibility as to Program Type:** The program should focus on the attainment of industry-recognized credentials and employment and earnings outcomes, regardless of whether the college programs are credit or non-credit. Many non-credit community college programs are fundamentally equivalent to for-credit programs and of the same quality.

Suggested Edits to National Apprenticeship Act

(Page numbers refer to H.R. 447)

p. 45, where appropriate – National Advisory Committee – add a subparagraph that adds educational alignment generally and fostering the growth of apprenticeships that articulate with and provide other recognized postsecondary credentials more specifically, as one of the tasks of the committee.

p. 53, line 8 – add a subparagraph requiring education and training provider representation on state councils.

p. 89, line 22 – Apply the minimum hour requirement for related instruction only to time-based apprenticeships by deleting “or hybrid”. This would provide the flexibility to make RI fully competency- based within a hybrid program.

p. 114, where appropriate – add a subparagraph adding the percentage of program participants that received recognized postsecondary credentials (other than apprenticeship certificate) to the elements required in the state agency’s annual report.

p. 129, line 10 – require that a minimum of 15% of the modernization grants be dedicated (or primarily dedicated) to educational alignment.