



The Honorable John Kline  
Chairman, Committee on Education and the Workforce

The Honorable Virginia Foxx  
Chairwoman, Subcommittee on Higher Education and Workforce Training  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairs Kline and Foxx:

On behalf of the nation's community colleges, we write to thank you for holding a hearing today on reauthorization of the Workforce Investment Act (WIA) and for your leadership on this issue, along with Representatives McKeon and Heck. WIA reauthorization has long been a priority for our associations, and we look forward to working with you as the Workforce Investment Improvement Act (H.R. 4297) progresses through the legislative process. For community colleges, H.R. 4297 improves on current law in some key respects, while other provisions are of concern to our institutions.

Throughout this extended WIA reauthorization process, we have sought to convey the strong belief of our members that community colleges should be considered integral partners in the workforce system at the state, regional and local levels. We hope to continue working with you to incorporate language into H.R. 4297 that specifically provides for a stronger role for community colleges in state and local planning and implementation of workforce investment activities. These efforts must start, however, with ensuring that community colleges remain members of state and local Workforce Investment Boards (WIBs). We understand your desire to streamline the boards' memberships, as our members have also complained of overly-large WIBs. Under the terms of H.R. 4297, however, it would be possible to have boards with no representation from vital aspects of the system, including training providers such as community colleges. As providers of occupational training, adult basic education, postsecondary education and other key services for WIA participants, we believe that community college WIB representation is vital to the system's success and should be required in statute.

As leading training providers in the workforce investment system, the current reporting requirements to maintain eligibility as a training provider have deterred some colleges from making their programs eligible. Particularly problematic is the requirement in current law that institutions must report earnings and income outcomes for all of their program completers, not just WIA participants, in order to maintain eligibility. Continued lack of access to unemployment insurance wage records in some states makes compliance with this requirement difficult, though we are encouraged that H.R. 4297 seeks to improve that situation. We are heartened that H.R. 4297 improves on current law by giving governors more discretion in devising training provider eligibility criteria and directing governors to consider a trainer's performance *with respect to WIA participants* when doing so. We continue to believe that programs offered by public institutions of higher education are subject to more than enough safeguards that they should be automatically eligible so long as other basic requirements are met and sufficient information about the programs is provided to WIA participants, much in the same way that H.R. 4297 makes apprenticeship programs eligible so long as they meet the requirements of the National Apprenticeship Act. We urge you to consider this change.

We remain concerned about the provisions in the bill that would establish an infrastructure fund with contributions from the administrative funds of partner programs. We believe that, ideally, dedicated funds should be provided for this purpose. In any case, a system to bring partner programs together to operate One-Stop Centers should allow for options other than funds being diverted at the state level, such as in-kind contributions.

Community colleges have long supported additional flexibility in the general rule that training be provided to WIA participants through individual training or career enhancement accounts, as they would be renamed by your legislation. We thank you for including the provision that allows for training contracts with institutions of higher education when there is an opportunity to facilitate the training of multiple individuals for in-demand sectors or occupations. Providing training in this fashion to WIA participants better allows community colleges to expand training capacity to meet increased needs. For similar reasons, we are supportive of language in the bill that encourages industry sector partnerships.

We appreciate the intent behind the revamped performance measures to encourage longer-term education and training for WIA participants by allowing state and local systems to “count” current and recent WIA participants that are still enrolled in postsecondary programs or completed them subsequent to their participation in WIA. We hope that changing the measures in this way will, resources permitting, allow more workers to get the education and training they need to attain or retain employment in high-demand occupations.

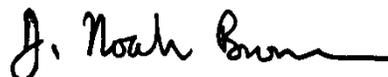
AACC and ACCT have not historically taken a position on consolidation of the funding streams within WIA and we do not object to the concept of program consolidation *per se* as long as it is done to help program effectiveness and takes into account the particular needs that a given program fulfills. For this reason, we are pleased that H.R. 4297 no longer permits governors to consolidate Perkins Career and Technical Education funds into the Workforce Investment Fund. We have also consistently advocated that federal programs that help people access education and training prioritize those who need that assistance the most. We are concerned that assistance currently targeted to those with the most economic need and other unique characteristics, even with the steps taken in the legislation to address these issues, will be diminished under the structure set out in H.R. 4297, especially given the legislation’s removal of overall priority for low-income individuals. While we understand the authorization level for the Workforce Investment Fund is reflective of current appropriation levels, we would urge your continued support for this level of funding throughout the appropriations process.

Thank you for your consideration of our views. We hope that the committee will work on a bipartisan basis to fashion the strongest WIA reauthorization bill possible.

Sincerely,



Walter G. Bumphus  
AACC President and CEO



J. Noah Brown  
ACCT President and CEO