



April 17, 2012

The Honorable George Miller
Ranking Minority Member
Education and Workforce Committee
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Rubén Hinojosa
Ranking Minority Member
Subcommittee on Higher Education
and Workforce Training
U.S. House of Representatives
Washington, D.C. 20515

The Honorable John Tierney
Education and Workforce Committee
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Miller, Congressman Hinojosa, and Congressman Tierney:

On behalf of the nation's 1,200 community colleges and their CEOs and trustees, the American Association of Community Colleges and the Association of Community College Trustees are writing to express our appreciation for your commitment to the reauthorization of the Workforce Investment Act. H.R. 4227 includes several priorities for community colleges, as well as some concerns and potential areas of improvement. We look forward to working with you, as well as Education and Workforce Committee Republicans, as we work towards reauthorization.

There are several provisions in the bill for which we wish to express support, including:

- An \$8 billion authorization for the Community College to Career Fund. This authorization supports innovation and partnerships to help train and place workers in high-need fields. This program also reinforces the work that has been done through the Trade Adjustment Assistance Community College and Career Training Grant program which is set to expire in 2014.
- Maintaining the requirement that community colleges have a representative on the state and local workforce boards. As providers of occupational training, adult basic education, postsecondary education and other key services for WIA participants, we feel that community college WIB representation is vital to the system's success and should be required in statute.
- The authorization of a separate stream of funding for One-Stop Center infrastructure. This addresses a long-standing criticism of the current WIA structure, which lacks a dedicated source of funding for infrastructure has resulted in the siphoning of resources from training and partner programs.
- Additional authority for Workforce Investment Boards (WIBs) to contract with institutions of higher education for training programs.

We are especially heartened to see modifications to the eligibility provisions for training providers that would greatly streamline the process for public institutions of higher education. We believe this change will help lead to even greater community college participation in the workforce investment system. We have concerns, however with the additional requirement that training providers report on program participants that enter unsubsidized employment in a field that is related to the program. While we understand your desire to obtain this information, available data sources such as unemployment insurance wage records often do not contain the level of detail necessary to fulfill this requirement. Alternative methods of obtaining this information will potentially be very burdensome for training providers.

We appreciate the consideration in aligning accountability requirements across titles, and the desire to better identify successful programs. However, we are concerned about the inclusion of language directing the Secretaries of Education and Labor to develop new performance indicators for core programs serving employers. This provision has the potential to impose new data collection requirements that are burdensome for our institutions.

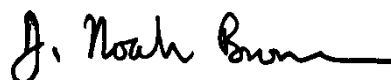
Throughout this extended WIA reauthorization process, we have sought to convey the strong belief of our members that community colleges should be considered integral partners in the workforce system at the state, regional and local levels. While the inclusion of the Community College to Career Fund certainly underscores this notion, we hope to continue working with you to incorporate language into final legislation that specifically provides for a stronger role for community colleges in state and local planning and implementation of workforce investment activities.

Thank you for your consideration of our views. We thank you for your commitment to reauthorization, and 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