



March 14, 2013

Dear Representative:

On behalf of the nation's community colleges, we write to express our thoughts regarding H.R. 803, the Supporting Knowledge and Investing in Lifelong Skills (SKILLS) Act. We are grateful this issue has come to the forefront, as the reauthorization of the Workforce Investment Act (WIA) has long been a priority for our member institutions. The SKILLS Act represents a noteworthy effort in working towards reauthorization, and while the legislation has several positive aspects we also have significant concerns with the bill.

The SKILLS Act reorganizes the structure of the state and local Workforce Investment Boards (WIBs), and in doing so makes community colleges optional members of the WIBs. As leading 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. We appreciate the notion of streamlining the boards' memberships, however under the terms of H.R. 803 it is possible to have boards with no representation from community colleges.

We are supportive of the provisions in H.R. 803 that allow for training contracts with institutions of higher education, as this has been a long-time priority for our institutions. This would give community colleges the opportunity to facilitate the training of multiple individuals for in-demand sectors or occupations, and expand training capacity to meet increased needs. These provisions were augmented in markup with provisions encouraging pay-for-performance modes of service delivery.

It is also a priority of our institutions to make public institutions of higher education automatically eligible as training providers under WIA. We are heartened that H.R. 803 improves on current law by giving governors more discretion in devising training provider eligibility criteria, however we would ask that this be taken a step further. 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.

AACC and ACCT do not object to the concept of WIA program consolidation as long as it is done to help program effectiveness and takes into account the particular needs that a given program fulfills. We are concerned that assistance currently targeted to those with the most economic need and other unique characteristics will be diminished under the structure set out in H.R. 803, especially given the legislation's removal of overall priority for low-income individuals.

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 appreciate the work the committee has taken to reauthorize WIA, and look forward working with the House and Senate as we continue this process.

Thank you for your consideration of our views.

Sincerely,

Walter G. Bumphus
AACC President and CEO

J. Noah Brown
ACCT President and CEO