

**Congress of the United States**  
**Washington, DC 20515**

July xx, 2020

The Honorable Nancy Pelosi  
Speaker  
U.S. House of Representatives  
H-232, U.S. Capitol  
Washington, D.C. 20515

The Honorable Mitch McConnell  
Majority Leader  
U.S. Senate  
S-230, U.S. Capitol  
Washington, D.C. 20510

The Honorable Mitch McConnell  
Minority Leader  
U.S. House of Representatives  
H-204, U.S. Capitol  
Washington, D.C. 20515

The Honorable Charles E. Schumer  
Minority Leader  
U.S. Senate  
S-221, U.S. Capitol  
Washington, D.C. 20510

Dear Speaker Pelosi, House Minority Leader McCarthy, Senate Majority Leader McConnell and Senate Minority Leader Schumer:

Thank you for your leadership and support during the current global pandemic. As Congress negotiates and finalizes the next emergency coronavirus relief package, we ask that you maintain language that distributes funding to institutions of higher education based on total or headcount enrollment rather than full-time equivalent (FTE) enrollment.

The nearly \$14 billion in funding provided to institutions through the CARES Act provided critical relief as institutions switched to online learning. In accordance with language in the CARES Act, the Department of Education distributed Higher Education Emergency Relief Funds (HEERF) to institutions based on their share of FTE enrolled Pell Grant and non-Pell Grant students.<sup>1</sup> Unfortunately, using FTE for funding allocations significantly disadvantaged public community colleges since these institutions are more likely to enroll students on a part-time basis.

Community colleges play a critical role in society by providing millions of people with low cost access to higher education, workforce development, and community support. These institutions are just as important as four-year public and private institutions; often providing the same level of student support with far fewer resources. Unlike four-year colleges, community colleges do not have large endowments or access to institutional resources like philanthropic donations to support their institutions.

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<sup>1</sup> U.S. Department of Education, "Methodology for Calculating Allocations per Section 18004(a)(1) of the CARES Act," April 9, 2020, <https://www2.ed.gov/about/offices/list/ope/heerf90percentformulaallocationexplanation.pdf>.

According to the Department of Education, about 22 million undergraduate students enrolled at postsecondary institutions in the 2017-2018 academic year.<sup>2</sup> During that same year, community colleges enrolled 8.5 million students which is nearly 40 percent of all college students across the country. In Fall 2018, over 7 million students enrolled in college on a part-time basis and about half of those students attended a community college.<sup>3</sup> However, public community colleges only received about 27 percent of CARES Act HEERF funds.<sup>4</sup> Using FTE to determine funding allocations allows the Department of Education to count a part-time student as half of a full-time student. This artificially reduces the community college enrollment numbers resulting in a smaller funding allocation. If total headcount is used in the next coronavirus relief package, community colleges would receive about 47 percent of the higher education funding.

The current pandemic has caused the same disruptions in education for full-time and part-time college students. Part-time students also need emergency financial aid for laptop purchases, internet services, living expenses and childcare. In fact, part-time students are more likely to be lower income and work full time to pay their way through college while also supporting their families. These are students that would greatly benefit from an increase in funding allocations based on headcount and not FTE.

States are facing unprecedented budgets cuts far greater than those experienced during the Great Recession and our public institutions will continue to experience revenue losses as the pandemic continues. Community colleges rely heavily on state and local tax dollars for revenue. In the 2017-2018 academic year, more than fifty percent of their \$62.3 billion in revenue came from state and local dollars. If community colleges do not receive additional support from the federal government, these colleges will be unable to provide adequate support services to their students and may even face permanent closures.

As the pandemic persists and Congress continues to respond to COVID-19, it is imperative that we equitably invest in and support our community colleges and their students. Congress must ensure that future higher education funding is distributed using a total headcount formula that will stabilize the community college system and alleviate some of the financial burden from the public health crisis. Failure to do so will result in a substantial and harmful impact for colleges, students, and the economy.

Thank you for considering our request.

Sincerely,

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<sup>2</sup> U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS), 2017-2018, 12-Month Unduplicated Headcount Enrollment component. Accessed on July 29, 2020, <https://nces.ed.gov/ipeds/use-the-data>.

<sup>3</sup> U.S. Department of Education, National Center for Education Statistics, IPEDS, Fall Enrollment component 2018 provisional data, Accessed on July 29, 2020, <https://nces.ed.gov/ipeds/use-the-data>.

<sup>4</sup> Center for American Progress, "A Better Formula for Higher Education's Federal Coronavirus Funding," Ben Miller, May 11, 2020, <https://www.americanprogress.org/issues/education-postsecondary/reports/2020/05/11/484838/better-formula-higher-educations-federal-coronavirus-funding/>.