April 5, 2022

The Honorable Robert Scott                          The Honorable Virginia Foxx
Chairman                                             Ranking Member
House Committee on Education and Labor              House Committee on Education and Labor

Dear Chairman Scott and Ranking Member Foxx:

On behalf of the nation’s 1,042 community colleges, we write in response to the Workforce Innovation and Opportunity Act of 2022 (H.R. 7309) being marked up by the Committee on Education and Labor today. We are thankful that the committee is addressing this vital legislation and for the opportunity to provide input into the draft bill. As reflected in our comments submitted previously, there are several aspects of the bill that our associations support, and some that we hope to further address as the bill proceeds in the legislative process.

We are especially heartened that the legislation authorizes the Strengthening Community Colleges Training Grants program. This authorization strongly underscores the importance of community colleges to the federal workforce education system and provides a solid underpinning for this already-funded program. We believe that authorization levels for this program should be set higher (starting at $200 million or more) to further underscore this point. This would make the program’s size closer in scale to the Trade Adjustment Assistance Community College and Career Training grant program that preceded it.

The legislation also supports the vital role of community colleges by including community college leaders on state workforce development boards and by highlighting the community college role in state plan development. It also improves the mechanisms by which local infrastructure is funded, a frustration for many of our colleges. Finally, we are grateful for changes that were made between the discussion draft and introduced version of the bill that were responsive to our comments in other areas and generally improved the bill.

Our principal concern with the bill is that it misses an opportunity to streamline the process of including community college programs on the state eligible trainer provider lists. Many of our member institutions have told us that they would make more of their programs eligible if it were not for the requirements that the process imposes on them, particularly the obligation to report data for all individuals in a college program, and not just WIOA participants. That requirement remains unchanged...
in H.R. 7309. We understand and appreciate that these provisions are intended to protect and inform WIOA participants about the options available to them. However, we believe current law and this legislation unintentionally limit program choice for participants. We hope to continue working with the committee to address this issue.

Thank you for considering our views on this important legislation.

Sincerely,

Walter G. Bumphus  
AACC President and CEO

Jee Hang Lee  
ACCT President and CEO