



October 28, 2019

The Honorable Bobby Scott
Chairman
Education and Labor Committee
U.S. House of Representatives

The Honorable Virginia Foxx
Ranking Member
Education and Labor Committee
U.S. House of Representatives

Dear Chairman Scott and Ranking Member Foxx:

I am writing on behalf of Rebuilding America's Middle Class, a coalition of community colleges to provide comments on *H. R. 4674, the College Affordability Act*. We appreciate the Committee moving forward with legislation to remedy the long overdue reauthorization of the Higher Education Act.

RAMC is a coalition of state and individual community college systems from across the country, representing over 120 colleges and 1.5 million students. We serve 45 percent of all first-time freshmen, 40 percent of our students are the first in their family to attend college, and a significant proportion of our nation's minority undergraduates attend community colleges, including 42 percent of all African American undergraduates, nearly half of all Hispanic undergraduates, and 56 percent of Native American undergraduates. Community colleges have historically existed to make higher education accessible for everyone and match our employers' need for a large, diverse workforce. We know the importance of preparing more Americans to enter the workforce with the skills they need to compete for in-demand jobs.

RAMC sees great benefit with several key provisions of this legislation for community college students. First, we strongly support the increase in the maximum Pell Grant by \$500 and the grant's indexation to inflation. Pell Grants are the most important tool for community colleges in ensuring post-secondary access for low-income students. For many such students, Pell Grants cover almost all or a large share of the cost of tuition and fees at community colleges. RAMC also supports the bill's increase in lifetime Pell Grant limits from 12 semesters to 14. This will allow students that attend part-time and have to stop and start their studies to have the flexibility to complete their credential or degree.

We would also be remiss if we did not express our support for lifting the ban on Pell Grant for incarcerated individuals. Several of our member colleges participate in the U.S. Department of Education's Second Chance Pell Experimental Sites Initiative. Our schools have seen firsthand how the power of high-quality postsecondary credentials and degrees can open up employment and economic paths to individuals once they leave prison. We appreciate the components of the bill which ensure equity for incarcerated individuals related to faculty, student information and transferability of credits earned.

Community college students are particularly vulnerable to emergency financial situations derailing their education. Whether their car breaks down, or there is a childcare emergency, any expense of even \$200 or \$300 dollars can cease their ability to attend class. Likewise, many of our students also have unmet need beyond tuition and fees that their Pell Grants and other forms of grant aid do not cover. For these reasons, we were pleased to see both the reservation of Supplemental Education Opportunity Grant (SEOG) funding to provide emergency grants to students and the bill's focus in several grant programs on meeting the unmet need of postsecondary students. Regarding the emergency grants, it is particularly important that the bill requires specific reporting and documentation of what funds are used for to ensure students receive the full benefit of these authorities.

RAMC also appreciates the inclusion of the new Job Training Pell Grant authority to cover the cost of short-term credentials that can be earned in 8 to 15 weeks. We believe the bill's language on using Workforce Innovation and Opportunity Act (WIOA) eligibility, requiring a stackable approach and required industry and business roles are important inclusions that will ensure Pell funds used for short term certificates result in increased income potential. While we support the concept of an earnings test, unfortunately, the current metric in the bill will not allow many of our students to benefit from this new grant opportunity. This metric would require short-term credentials to meet the Bureau of Labor statistics (BLS) and Census Bureau salary estimates for individuals with a high school diploma and no college. Nationally, the BLS estimates the annual salary for this population at approximately \$39,000 a year. While the bill allows for some BLS/Census state-level comparisons those are also high, especially relative to the economies of RAMC member states.

One of the biggest focuses of our schools is providing those making minimum wage with only a high school diploma or its equivalent with the education and skills to start them on a pathway to an economically rewarding career. Students who are making \$12,000 to \$15,000 a year are prime candidates to start their postsecondary education through a short-term credential that is stackable. But few employers are going to hire someone that was making minimum wage and who has earned a short-term credential at the bill's earnings threshold at the national level of \$39,000. We look forward to working with the Committee to refine the language in the bill to better reflect many of the real-world economic situations in which our students find themselves.

While RAMC appreciates multiple aspects of this bill that would benefit community college students, we are concerned about the impact of the current version of the community college portions of America's College Promise (ACP) on our schools and students. We are not confident that the 25 percent state match required to participate in ACP can be fiscally achieved in many states. If a patchwork of states participate, some students will benefit or not benefit from this program based on where they live creating unequal Federal aid treatment. In addition, while the Maintenance of Effort requirements seek to ensure that state appropriations for public education overall (and four-year public colleges in particular) do not shrink below previous levels, public community colleges in the state could see their level of state support shrink relative to public four-year schools.

We very much appreciate and support the intent and goal behind the community college provisions of ACP but believe that the funds appropriated for this program would be better spent funding the unmet need of our students or raising the maximum Pell Grant. Such approaches could apply uniformly across the country. In addition, because community colleges have some of the lowest tuition and fee costs of any postsecondary education sector a rise in Pell Grants will help address the needs of our low-income students who struggle the most with even the relatively low cost of a community college education.

Lastly, RAMC members support improved data and accountability for strong outcomes. The legislation addresses these issues by including the provisions of the College Transparency Act, which we support, as well as directing accreditors to increase their focus on student outcomes. However, with respect to language related to program integrity, we are troubled with provisions which appear to give the Secretary and the Federal government a far greater role over accreditors, and specifically – defining academic quality, than we feel is appropriate.

Thank you for your consideration of our views. We look forward to working with you to improve this bill as it advances through the legislative process.

A handwritten signature in blue ink that reads "Joe D. May". The signature is written in a cursive, flowing style.

Joe May
Board Chair, Rebuilding America's Middle Class (RAMC)
Chancellor, Dallas County Community College District