



August 17, 2020

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

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

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

The Honorable Kevin McCarthy  
Minority Leader  
U.S. House of Representatives  
H-204, U.S. Capitol  
Washington, DC 20515

Dear Congressional Leadership:

I am writing on behalf of Rebuilding America's Middle Class, a coalition of community colleges, to thank you for your leadership on the COVID emergency response packages to date, including the nearly \$14 billion for institutions of higher education (IHEs) authorized through the *Coronavirus Aid, Relief, and Economic Security (CARES) Act*. These resources are crucial to helping our students achieve their educational goals. As discussions on the next package continue, I want to reiterate our recommendations to enable community colleges to meet the needs of students this fall and beyond. Specifically, I write to ensure the next COVID relief bill allocates funding to IHEs based on a headcount of students rather than limiting the count to full-time equivalent (FTE) students.

RAMC represents more than 120 community colleges and 1.5 million students nationwide. As you know, community colleges serve 45 percent of all first-time freshmen and 40 percent of our students are first-generation college students. Additionally, a significant proportion of our nation's minority undergraduates attend community colleges, including 44.6 percent of all African American undergraduates, 49.7 percent of all Hispanic undergraduates, and 48 percent of Native American undergraduates. Community colleges are open access, seek to make higher education accessible and affordable for everyone and match employers' need for a larger, more diverse workforce. We know the importance of preparing more Americans to enter the workforce with the skills necessary to compete for in-demand jobs, especially during times of economic recession or labor market contraction.

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>i</sup> Unfortunately, using FTE for funding allocations significantly disadvantages two-year institutions, including more than 120 RAMC member institutions, which have a greater percentage of part-time students.

Amid this current national emergency, our institutions and many other community colleges across the nation are working tirelessly to help ensure students have access to the education and support services they need to continue with their programs. Community colleges have an open access mission, which means these institutions provide a pathway to education for any member of the community. We play a critical role in society by providing millions of students with low cost access to higher education, workforce development, and community support. During these unprecedented times, pursuing our mission has meant moving thousands of courses to new [online modalities](#) and instituting new programs and initiatives to aid the many students who are struggling through the COVID-19 crisis, such as offering free [Wi-Fi hotspots](#), creating [pop-up food pantries](#) for food-insecure students, and lending [office spaces](#) to provide mental health services.

The language in the CARES Act implies community colleges provide fewer, less valuable services than four-year public and private institutions, when in fact we provide quality postsecondary opportunities for low-income, first-generation, and other underserved student populations who have far fewer resources – all at a lower cost than traditional institutions. For example, approximately 22 million undergraduate students were enrolled at postsecondary institutions in the 2017-2018 academic year.<sup>ii</sup> During that same year, community colleges enrolled over 8.5 million students, or 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>iii</sup> However, community colleges only received about 27 percent of CARES Act HEERF funds.<sup>iv</sup>

Similarly, to illustrate the difference in funding, analysis conducted by Wisconsin Technical College System (a RAMC member) found that, while public four-year and two-year systems in Wisconsin had the same percentage of Wisconsin’s 2018-19 Pell Grant recipients (39 percent), public four-year institutions received 53 percent of Wisconsin’s CARES Act IHE funding, while public two-year institutions received just 23 percent, despite serving 42 percent of all undergraduate headcount enrollments in the state.

The pandemic has caused massive disruptions in education for both full-time and part-time college students. Our students, who tend to be working and raising families at higher rates than other postsecondary students, have been hit the hardest by the transition to online instruction. Many are already part-time students, others had to reduce their course load to meet changing family demands (including reduced childcare options or job losses) during this time. Additionally, some of our programs require physical in-person instruction and learning, likely leading students in those programs to delay completion until after the COVID-19 emergency passes. These part-time students also need emergency financial aid for laptop purchases, internet services, living expenses and childcare.

Because some community college programs, particularly vocational programming, require education and training to be conducted through in-person instruction, we are also working to improve the safety of our facilities by making critical upgrades to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) air handling recommendations. ASHRAE recommends upgrading air-filters, increasing airflow versus recirculating inside air, and installing ionization elements. These steps are vital to help purify indoor air quality, but they are come at considerable expense. The cost to make these upgrades to the average college building is approximately \$10,000. When you consider the number of buildings on community college campuses, these costs could quickly escalate to over \$100,000 per campus and millions across State

community college systems. Shifting to a headcount formula rather than an FTE formula to calculate Federal COVID relief funds would increase the resources available to community colleges to better support the health of our students and staff participating in in-person instruction.

While our colleges are working diligently and creatively to find new outlets to support students and their communities, additional aid from the Federal government is vital to our continued ability to help students during this crisis and ensure community colleges across America can continue to effectively and nimbly respond to our nation’s changing education and workforce demands. Without additional support, we may no longer be able to serve our students due to significant revenue losses as the pandemic continues. States already face unprecedented budgets cuts far greater than those experienced during the Great Recession, and community colleges rely heavily on state and local tax dollars for revenue. For example, in the 2017-2018 academic year, more than fifty percent of community college’s \$62.3 billion in revenue came from state and local dollars. If community colleges do not receive additional support from the Federal government, the quality, relevance, and affordability of community college programs will decline, reducing access to postsecondary opportunities for our nation’s most vulnerable students.

We urge Federal policymakers to ensure that future higher education funding related to COVID-19 relief is distributed using a total headcount formula. It is imperative that we equitably invest in and support our community colleges and their students in the next COVID-19 package advanced by Congress.

Thank you for your consideration of our views. We look forward to working with you to ensure the needs of community college students are met during these unprecedented times.

Sincerely,



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

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i 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>.

ii 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>.

iii 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>.

iv 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/>.