



June 28, 2002

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Re: WIA/TANF Reauthorization, Federal Register Notice of Feb. 28, 2002

Dear Ms. Flynn:

On behalf of the American Association of Community Colleges (AACCC), I appreciate the opportunity to comment on some of the issues to be addressed during reauthorization of the Workforce Investment Act (WIA). Approximately 1,100 of the nation's 1,200 community colleges are members of AACCC, which advocates on their behalf before Congress and the federal agencies.

AACCC and its member institutions supported the Workforce Investment Act when it was first enacted in 1998. Many of our member institutions were frustrated with the Job Training Partnership Act system, where a community college's relationship (or lack thereof) with the local Private Industry Council often determined how much opportunity the institution had to provide training to program participants. Community college leaders felt that implementation of a consumer-oriented system designed to offer different training options to Individual Training Account holders would result in increased community college participation in WIA programs.

Since its passage in 1998 and subsequent implementation, AACCC members have had varied experiences with WIA. Some community colleges participate fully on their local Workforce Investment Boards (WIB), are operators or active partners in One-Stop centers, and receive substantial numbers of training referrals. However, many other institutions, either by choice or circumstance, have not been active participants in the WIA system. Some institutions report that little has changed administratively since the JTPA, other than the names of the entities involved. Because WIA gives increased power to states and local areas to design their own workforce development plans, the different experiences of community colleges are linked to their location.

Modifications to some key provisions of WIA, however, can help community colleges play a greater role in WIA Title I training programs. Given the low cost, high quality, and easy accessibility of the training programs our member institutions offer, this would strengthen the Title I programs. Community colleges have three primary goals for the WIA reauthorization: streamlined training provider eligibility

requirements; increased access to training for WIA participants; and modified operation of the One-Stop centers. Community colleges are also generally supportive of more integration between WIA and TANF, but believe that TANF recipients must have more access to education to make this integration truly beneficial.

Streamlined Training Provider Eligibility Requirements

Nearly all community colleges express two principal frustrations with the reporting necessary to achieve subsequent eligibility as a training provider. First, because they must collect placement and wage data on *all* students in a given program, not just WIA participants, community colleges are reluctant to make programs eligible when very few WIA participants are referred to them. Second, WIA's reporting requirements are often similar, but not identical, to those for other federal programs such as the Carl D. Perkins Vocational and Technical Education Act and state accountability requirements. Community colleges, especially small institutions with limited resources, often find multiple reporting requirements to be prohibitive.

Uniform and flexible WIA and Perkins Act reporting requirements, utilizing data already collected by institutions for other purposes when possible, would encourage more community colleges to be active participants in the WIA system. Under the terms of an agreement with the Department of Labor, AACC has submitted a detailed proposal for revised eligibility requirements that would achieve these goals (see attachment). Because one of the primary goals for community colleges is to more closely link these eligibility reporting requirements with performance indicators in the Perkins Act, this proposal also includes new postsecondary Perkins Act performance indicators.

With this proposal, AACC is not advocating a significant rollback in the amount of reporting done by our institutions. The proposed reporting requirements would still provide WIA participants with all the data they need to make informed decisions when choosing a training provider, which is of course the principal goal of the current reporting requirements. WIA participants would still be provided information on completion rates - defined in the same way as in the Perkins Act - for all program participants. The proposal limits the reporting of wage and placement data to WIA participants only, which is the most relevant data for other WIA participants deciding upon the most appropriate training provider. The proposed revisions would also allow community colleges to satisfy the WIA reporting requirements by using substantially similar data already supplied to states and other entities. Finally, the proposal seeks to strengthen the requirement that states make wage records available to assist institutional compliance with the reporting requirements.

Increased Access to Training for WIA Participants

Many community colleges are frustrated with the low number of training referrals coming to them from the One-Stop centers. This situation may be partly attributable to the fact that WIA is still in the early stages of implementation, and much of the energy and resources on the local level has gone into establishing the One-Stop centers. AACC believes, however, that the WIA-mandated progression of services to program participants should allow for local flexibility to provide training immediately when appropriate.

WIA, like TANF, embodies a "work first" philosophy that emphasizes return to

the workforce as soon as possible. The mandated progression of services, from core to intensive to training, has reduced the overall number of people receiving training in many areas. In some cases, however, it is readily apparent that training is necessary for a WIA participant to achieve long-term success. Providing training to such individuals on an expedited basis may reduce the number of “repeat customers” of WIA programs. In this area, too, the experiences of our member institutions have varied. Some local WIBs have placed a higher priority on training, at least to the point that the law allows. Many others, however, are operating under a very strict interpretation of the statute and are emphasizing immediate job placement. WIA should clearly give local providers the necessary flexibility to refer a participant to training immediately when the need for such is readily identifiable. The law should place a renewed emphasis on the importance of attaining the skills necessary to succeed in the 21st century economy.

Modified Operation of the One Stop Centers

The centerpiece of WIA’s effort to integrate a wide range of federal workforce development activities is its expansion and mandated use of the One-Stop delivery system. Because they are Perkins Act grantees or providers of adult education, community colleges are often mandatory partners in the One-Stops. The law mandates that a portion of the funds that mandatory partners receive through the programs they administer be used for the operation of the One-Stops and provision of core services through the One-Stops, to the extent that such use is not inconsistent with the laws authorizing these programs. Many of these other laws, including the Perkins Act, contain provisions prohibiting or capping the amount of funds that can be used for operation of the One-Stops. Nonetheless, community colleges often face demands at the local level that they contribute Perkins funds to the operation of the One-Stops.

This method of funding the operation of the One-Stops is one of the largest obstacles to achieving the integration of services envisioned in WIA. The U.S. General Accounting Office reports that many mandatory one-stop partners are reluctant and/or unable to provide services through the One-Stops, often because of a lack of resources. Community colleges are loath to dedicate part of the small portion of Perkins Act funds they receive to this purpose, and are limited in their ability to do so by the Perkins Act itself. The One-Stop centers should be funded completely by a dedicated stream of federal support. If program funds are to be used, they should be reserved for this purpose at the state or federal level. This system would avoid the awkward negotiations that require local partners to relinquish program funds they have already received.

Integration of WIA and TANF

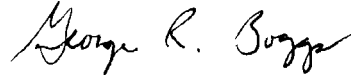
Increased access to training and education is a necessary component of any integration of WIA and TANF. Community colleges support integration of the two programs, but the benefits of this integration would be severely limited if increased work requirements and decreased educational and training opportunities for TANF recipients were to become law. AACC has consistently supported an *increase* in the opportunities for postsecondary education and training for welfare recipients. AACC supports, at a minimum, extending the time limit on vocational education in TANF from 12 to 24 months, and including adult basic and postsecondary education among the allowable activities for TANF recipients.

Conclusion

As the above comments make clear, AACC does not at this time recommend a radical overhaul of the Workforce Investment Act. Rather, with appropriate modifications in the areas discussed above, WIA would enhance the enormous ability of the nation's community colleges to be vital players in the federal workforce development system.

My staff and I look forward to working with the Department of Labor staff on these issues as WIA reauthorization draws closer.

Sincerely,

A handwritten signature in cursive script that reads "George R. Boggs".

George R. Boggs
President and CEO