



# higher learning

ADVOCATES

April 9, 2021

The Honorable Patty Murray  
Committee on Health, Education, Labor  
and Pensions  
Washington, DC 20510

The Honorable Richard Burr  
Committee on Health, Education, Labor  
and Pensions  
Washington, DC 20510

Dear Chair Murray and Ranking Member Burr:

On behalf of Higher Learning Advocates—a nonprofit organization that advances policy changes to support a system of higher learning that is student-centered, equitable, outcomes-based, and focused on educational quality—we thank you for your bipartisan leadership in calling for comments on how to improve various aspects of our nation’s workforce system. We are pleased to submit the following comments for your review and would welcome the opportunity for further discussions in this area.

There has never been a more important time to ensure that postsecondary education and training are responsive to the needs of adults seeking skills necessary to obtain and advance in employment. The COVID-19 pandemic has directly impacted many areas of our economy, dramatically reducing employment opportunities in some areas while expanding those in others. Many Americans have found themselves without paths to employment that were once plentiful. This, coupled with the fact that our nation’s higher education and training systems often are not structured to respond to the needs of older, working individuals with families of their own, makes the review you are undertaking especially critical.

Below we offer recommendations that will help to create and sustain a system of higher learning that values both education and training, and that paves pathways for learners to and through learning and work, both in immediate response to the COVID-19 pandemic and the resulting economic recovery, and for the future.

**Recommendations on how to enhance or improve workforce training in direct relation to the COVID-19 pandemic and economic recovery, including ways to address workforce needs of the health care and public health sectors**

**Broadband for online training and higher education:** The COVID-19 pandemic has made clear that high-speed internet access is a critical service and is essential to work, education, communication, and the ability to access and benefit from government services. Congress has responded to this reality in several ways since the start of the pandemic, most recently by passing the Emergency Broadband Benefit (EBB) program. The EBB will subsidize monthly internet costs and provide for an internet-capable device for low-income households and those with an individual participating in certain federal programs. Among several critical populations, eligibility includes households in which an individual has received a Pell Grant in the most recent award year.

While a return to more in-person postsecondary education and training is on the horizon, the need to ensure high-speed internet access for those seeking to gain skills and training through online courses will not end with the pandemic. For many working adults, and especially student parents, online access to training and education ensures they can enhance their employability while juggling other responsibilities, including work and caregiving. In order to make the current and future iterations of the EBB program work for Pell students, the EBB should be made permanent, receive an increase in funding available for the program, and computer matching agreements between the Federal Communications Commission (FCC) and the U.S. Department of Education should be authorized. A computer matching agreement, a common method of ensuring federal agencies can utilize information and data submitted through one federal program for eligibility decisions for another program, would ensure that EBB benefits are going to actual Pell-eligible households and would streamline the process needed for these households to prove their eligibility. We urge you, as part of any workforce package advanced through the Committee, to require the U.S. Department of Education to enter into a computer matching agreement with the FCC for EBB eligibility determinations related to Pell Grant eligibility.

**Short-term Pell:** Pell Grants provide significantly more federal assistance to individuals seeking workforce-related training and education than training services that is possible under the Workforce Innovation and Opportunity Act (WIOA). Currently, Pell Grants can only be used for programs that are 600 clock hours in length. This limits today's working students access to high-value skills training programs that enable them to advance their careers and reskill for positions in new industries, an important option given the impact of the COVID-19 pandemic on many aspects of our economy. Students who would greatly benefit from short-term training should not be forced to take classes they do not need, potentially take on more debt, and become less likely to graduate just because of outdated Pell Grant requirements.

We urge the Committee to consider allowing Pell Grants to be used for high-quality, short-term programs that are more than 150 clock hours, lead to an industry recognized credential, and meet quality guardrails like provided for in the bipartisan JOBS Act. Broadening the postsecondary education system to recognize all forms of high-quality postsecondary learning will allow more students to pursue higher learning and complete their postsecondary degree or credential while connecting short-term programs to a longer educational pathway, opening more doors of opportunity for learners.

**More funding for WIOA that is used specifically for training services:** In addition to Pell Grants, the other form of federal assistance that helps provide reskilling are training services provided under Title I of WIOA. WIOA's requirements to engage local government, employers, labor representatives, and education and training providers and can provide powerful connections to spur training for in-demand occupations. Unfortunately, far too little funding under WIOA core training programs has been used to fund actual training services for individuals. This shortchanges individuals seeking to upgrade their education and skills.

We urge the Committee to prioritize resources under Title I of WIOA for actual training services. This prioritization of funding could take many forms—requiring a certain percentage of WIOA funds at the state or local level to be used for training services or requiring funds above a certain amount that are received by state and local workforce boards to be used for such services.

In addition to a general focus on more funds being used for training, we urge the Committee to explore expanding the use of Individual Training Accounts (ITAs) specifically for training from high-quality providers. As part of any expanded focus on ITAs, we urge the Committee to closely examine the

requirements associated with each State's eligible training provider list (ETPL). As ETPLs are the gatekeeping mechanism that allow approved providers to provide training funded from ITAs, the focus on how states measure the quality of providers is critical.

### **Reforms to programs authorized under the Workforce Innovation and Opportunity Act**

**Child care assistance for those in workforce training and postsecondary education:** Child care is essential for working parents who participate in job training or postsecondary education. Unfortunately, too often child care availability and cost are insurmountable barriers for working parents seeking postsecondary education and training. Equally challenging is the ability to access child care near or at a location that an individual is participating in training or education.

While Congress has sought to address this through additional funding for the Child Care Development Block Grant (CCDBG) and the Child Care Access Means Parents in School (CCAMPIS) Program, these efforts have not sufficiently met the need for working parents participating in training or postsecondary education. As a result, we urge the Committee to explore how to better coordinate affordable child care access, possibly through a sliding fee scale, with WIOA Title I funded training and postsecondary education. We also urge an exploration of what the Committee can do to ensure child care access is located in close proximity to education and training locations. Lastly, we urge the Committee to explore ways to expand the amount of federal funds for the CCAMPIS program, even entertaining a mandatory funding supplement to annual discretionary appropriations.

**Wraparound services for training participants and higher education students:** Too often the barrier for low-income and working adult students is not just the cost of college, but also includes the lack of supports for other critical services they need in their lives. Often a lack of safe housing, adequate food and nutrition, and access to health care services can prevent or derail the ability to participate in job training or postsecondary education. While there are existing federal programs that seek to address these needs, unfortunately, too often those enrolled in job training and postsecondary education have trouble applying for and receiving such services.

We urge the Committee to require local job training systems and institutions of higher education to (1) provide information to all participants and students on the availability of means-tested support programs in critical areas such as housing, food, transportation, and health, and (2) serve as a coordinating body that assists students in gaining access to these means-tested support programs. In addition, the Committee should explore how to better streamline eligibility of federal means tested programs so that job training participants and postsecondary students should not have to submit the same information to multiple federal programs to receive benefits.

**Community College Workforce Program:** Community colleges continue to be a major engine to help individuals get the education and training they need to gain and retain employment, especially working adult students. Even factoring in the bandwidth of community colleges to work with employers and other regional and local partners, there is a national interest in ensuring that programs offered at such institutions provide the best training and preparation for jobs.

A decade ago, Congress enacted the Trade Adjustment Assistance Community College and Career Training (TAACCCT) program. This program provided a major investment to modernize their program offerings to ensure they were focused on job opportunities and met the needs of those seeking out

education and training. Especially important to this effort were the partnerships that colleges developed with local and regional businesses to ensure program completers were able to obtain industry-recognized credentials. We urge the Committee to build upon this concept and enact a new version of TAACCCT that can benefit all individuals seeking to improve their education and skills at community colleges.

**Ways to develop, modernize, and diversify the national apprenticeship system, including innovative approaches such as youth apprenticeship and pre-apprenticeship**

**Better reporting on populations access and completing apprenticeships:** The current Registered Apprenticeship Partners Information Database System and other Department of Labor data systems provide the present underpinnings of data collection regarding registered apprenticeships. Unfortunately, these systems provide uneven amounts of data around the demographic characteristics of what populations are accessing and completing apprenticeships. Without a breakdown of demographic characteristics on age, race, and sex (and age by race and sex), it is difficult to evaluate whether individuals of color and women (often referred to as nontraditional apprenticeship populations) are accessing and completing apprenticeship programs at the same level as their peers.

We urge the Committee to expand the reporting required of nontraditional apprenticeship populations to disaggregate for age, race, and sex (including age by race and sex). The National Apprenticeship Act that was recently passed by the House requires a portion of this type of reporting by state agencies. We urge the Committee to build upon the requirements in the House bill to fully capture this information.

**Strategies to encourage innovation to address worker and industry needs**

**Innovation Fund at the Department of Labor:** While Title I of WIOA has a dislocated worker and other national activity authorities, DOL lacks the authority to fund innovative approaches to increasing the frequency of high-quality job training in in-demand fields. This lack of authority limits DOL's ability to pilot and create demonstrations that would drive training programs with better outcomes for participants. We urge the Committee to consider creating such an authority within WIOA.

Thank you for considering our views. We look forward to working with the Committee as it advances legislation in the workforce space.

Sincerely,

Julie Peller  
Executive Director  
Higher Learning Advocates