

**Pennsylvania Commission for Community Colleges**  
**Public Comment**  
**on the Pennsylvania State System of Higher Education Redesign and Integration**

As the largest provider of public undergraduate education in Pennsylvania, colleague institutions in Pennsylvania's public higher education continuum, and partners in Pennsylvania's comprehensive education and workforce development systems, Pennsylvania's community colleges are keenly interested in the Pennsylvania State System of Higher Education (PASSHE) System Redesign and University Integration (redesign/integration). Community colleges have a long history of working collaboratively with other sectors of higher education in Pennsylvania and are eager to continue their work with PASSHE and state-related postsecondary partners to build a strong higher education system in the Commonwealth. Thank you for consideration of the following public comments.

Pennsylvania community colleges were established nearly 60 years ago by the Community College Act of 1963. Since then, these community anchors and bedrocks of higher learning have educated approximately 13 million credit and non-credit students across the Commonwealth. In the 2019-2020 academic year, Pennsylvania community colleges enrolled a quarter of a million students – students from every county in Pennsylvania – in both credit and non-credit programs and conferred over 15,700 awards, including nearly 12,500 associate degrees, with more than 40 percent being awarded in STEM-H fields.

Enrollment demographics at Pennsylvania's community colleges reflect the cultural diversity of the Commonwealth. More than half of Pennsylvania community college students identify as female and 42 percent male, with the average age of students being 25. Notably, the colleges serve the state's historically underrepresented students, enrolling a greater number and proportion of non-white undergraduate students than any other higher education sector in Pennsylvania, in particular Black and Hispanic students.

Pennsylvania community colleges also serve more low-income and first-in-their-family college students than any other sector of higher education. Nearly half of community college students in the Commonwealth are considered very low-income, coming from families earning less than \$30,000 annually. More than 45 percent of community college credit students receive financial aid. Collectively, community college students received \$24.9 million in state grant support in 2019-2020, including 23,789 students who received a PHEAA state-grant.

The 14 community colleges, plus a new one in Erie scheduled to enroll students in Fall 2021, are the foundation of the Commonwealth's public postsecondary education structure. One in four undergraduates enrolled in a Pennsylvania degree-granting institution attend a community college. Community college transfer students are also a significant source of enrollments for the state's public and private baccalaureate degree granting institutions. Each year, more than 30,000 students who attended a community college transfer to another institution to continue their postsecondary study, with 80 percent of these students transferring to another Pennsylvania institution.

The community colleges are also an integral component of the state's workforce development system. Working collaboratively in their communities with employers and workforce development boards, the colleges provide training for thousands of Pennsylvanians. The colleges educate the Commonwealth's emergency services professionals – including firefighters, EMS, and police – as well as other high-demand workers such as truck drivers, nursing assistants, electricians, bookkeepers, and mechanics.

The colleges are also community anchors throughout the Commonwealth. The colleges employ more than 22,500 individuals statewide, add as much as \$13.6 billion to the Pennsylvania economy annually, and provide an array of economic, social, and cultural benefits to the communities they serve.

In reviewing the PASSHE redesign/integration, the Commission has reflected upon the expertise and experience of Pennsylvania's community colleges, researched best practices from across the nation, and offers the following 12 actionable recommendations.

**1. Pennsylvania should pursue a comprehensive and strategic approach to public higher education that focuses on all sectors, not just a single sector.**

Pennsylvania's postsecondary education landscape includes a broad array of public and private institutions with a long and distinguished history. However, that same array of institutions has sometimes been slow to adjust to changing circumstances. The data are clear that the demographics, student preferences and workforce requirements that supported Pennsylvania's higher education institutions in the past have changed significantly. At the same time, state funding to support public higher education in Pennsylvania has been inconsistent and inadequate when compared to other states.

As Pennsylvania looks to the future, it should pursue a comprehensive and strategic higher education agenda, not one that focuses solely on one sector. The comprehensive agenda should ensure that all the components of the Commonwealth's higher education continuum: community colleges, PASSHE institutions, state-related universities and PHEAA, complement each other to provide affordable and accessible postsecondary education to Pennsylvanians, and that public funds are used effectively to provide taxpayers with a positive return on their investment. Without a comprehensive and strategic approach, the Commonwealth will lose an opportunity to improve the delivery of public postsecondary education in the state by addressing its disorganized, duplicative, and costly structure.

A review of redesign/integration, however, reveals that it is a PASSHE-centric agenda, rather than the comprehensive, strategic agenda that is needed.

Redesign/integration has taken place without consideration of the programs and services offered by, or the impact on, other sectors. For example, Pennsylvania's community colleges regularly collaborate with PASSHE university colleagues on an array of highly successful initiatives to serve students and the Commonwealth. However, the perspective and impact of community colleges is absent in the current redesign/integration plans. The exclusion of the community college perspective and the potential consequences of redesign/integration on the state's community colleges, enrollment and operations falls short of a comprehensive and strategic approach. It could jeopardize the colleges, and the students, employees, employer partners and communities they serve. Most concerning, the lack of a comprehensive approach could magnify, and/or simply shift, the state's public higher education problems rather than solving them.

**2. Pennsylvania should leverage and integrate the expertise of all sectors of public higher education including community colleges, in redesign/integration.**

As the Commonwealth's largest provider of public postsecondary education and training, Pennsylvania's community colleges have extensive expertise and experience in serving the Commonwealth's students, employers and communities. Redesign/integration correctly recognizes the role of community colleges

in providing a pool of qualified transfer students to PASSHE, and in the West Proposed Implementation Report (see Appendix 1.4, pages 105 and 106), identifies community college students as one of five target market segments. To date, however, the Commission has not been consulted about the proposed partnership and anticipated enrollments. Without full knowledge of the precipitous decline in Pennsylvania's community college credit enrollment, projected trends and actions community colleges are taking with respect to recruitment and retention, the redesign/integration may inaccurately estimate the potential of this target market.

Pennsylvania's community colleges also have years of experience in adjusting and adapting to funding challenges and declining enrollments that they can willingly share with their higher education colleagues.

Pennsylvania's community colleges are funded through a combination of support from local sponsors, the Commonwealth, and student tuition and fees. Each year, the Commission submits a funding request to the Commonwealth that is based on the comprehensive needs of the colleges. However, the funding request has not been fulfilled for more than a decade, and the funds provided fall short of the historical and statutory vision for state support of community colleges. To reach the statutorily required one-third funding level, the Commonwealth would need to invest an additional \$121 million in Pennsylvania's community colleges, or a total of \$364.955 million in the community college operating appropriation alone.

This funding context makes it difficult for colleges to plan for the future and invest in new programs and equipment. Nevertheless, Pennsylvania's community colleges continue to operate within provided funding levels, making adjustments as needed, including reducing employees, eliminating programs, and implementing administrative cost efficiencies including collaboration, consolidation, and consortium purchasing.

Over the past eight years, community colleges have reduced their complement by five thousand employees, or 18 percent. Community colleges continuously strive to run lean and efficient institutions. Over the years the community colleges have offered early retirement plans, frozen or eliminated vacant positions, cut back on travel expenses, and implemented organizational changes to decrease or control costs. Furthermore, since the 2016-2017 academic year the community colleges have eliminated more than 100 credit programs from their offerings – a strategy that can only occur on a limited basis before becoming a detriment to the students. However, as public institutions, the colleges acknowledge they must operate within the parameters and funding levels provided and cannot spend money they do not have or incur obligations for which they cannot pay.

Community colleges have also adjusted to significant enrollment declines. While PASSHE has reported a 22 percent decline in enrollment over the past 10 years, Pennsylvania community college credit enrollment has declined even more sharply – by nearly 33 percent. The COVID-19 pandemic has further exacerbated the enrollment challenges at community colleges, both in Pennsylvania and across the country, causing even more dramatic and alarming enrollment declines than at 4-year institutions. These enrollment declines are projected to persist in Pennsylvania and the entire Northeastern United States due to demographic changes and shifting student behavior.

By acting responsibly and operating within their budgetary limits, community colleges can serve as a case study for other sectors of higher education to understand how to operate more efficiently and effectively and adjust operations to align with enrollments.

**3. Pennsylvania should ensure that revisions to its public higher education strategy reflect a student-centric approach, which emphasizes access and affordability for all students, particularly those from historically underrepresented populations.**

Providing accessible, affordable higher education to all Pennsylvanians should be the basis of Pennsylvania's public higher education agenda. Access and affordability in Pennsylvania are limited however, particularly for historically underrepresented populations.

Currently, community colleges in Pennsylvania serve more low-income, underserved, and minority students than any other public sector of higher education. In the 2017-2018 academic year, approximately 56,000 Pennsylvania community college students received a federal Pell grant, more than at both PASSHE (total recipients were 31,657) and the state-related universities (total recipients were 38,801).

If the Commonwealth is committed to ensuring that low-income students have access to high-quality education and workforce training, it should look to the sector of higher education that already serves as the institutions of choice for these students and the sector that provides students a pathway to a postsecondary credential – its community colleges. However, current conversations on access and affordability specifically exclude current and future community college students. This approach is short-sighted. Pennsylvania's community colleges and community college students must be appropriately funded and supported for Pennsylvania to attain its postsecondary attainment goals.

**4. Pennsylvania should ensure that redesign/integration reduces and avoids duplication.**

In passing the Community College Act of 1963, the General Assembly authorized community colleges to, among other responsibilities, provide two-year degrees and career and technical education to further economic development, address career and technical and occupational shortages and improve employable skills of residents. The General Assembly constructed a decentralized, locally controlled structure for the colleges so they could quickly respond to local needs. Over the past 60 years, the colleges have embraced this responsibility and today serve as the primary provider of workforce education and training in the Commonwealth. The colleges collaborate locally, regionally, and statewide with employers, industry councils, workforce development boards, secondary career and technical education (CTE) providers and other higher education institutions to train workers to support Pennsylvania's economy. Community colleges have more than 5,100 contracted training offerings and collectively offer programs that align with over 90 percent of the High Priority Occupations identified throughout the Commonwealth. In 2019-2020, the colleges partnered with 1,811 employers across the state to provide \$10.1 million of customized training for more than 75,000 Pennsylvania workers. Each community college employs senior-level staff to lead these efforts and coordinate with business leaders across the state. Every community college has numerous industry advisory councils which are engaged in review and design of program offerings.

The redesign/integration currently under consideration proposes to duplicate these statutorily authorized functions of Pennsylvania's community colleges. Redesign/integration recommends the establishment of new positions in both the east and the west that would duplicate the workforce development functions currently funded and operational at community colleges (see the proposed organizational charts on page 152 of the Northeast Proposed Implementation Plan Report and page 188 of the West Proposed Implementation Plan Report). Community colleges already have well-established and successful workforce training programs that can be expanded to serve as many Pennsylvanians as

need demands. The proposed establishment of duplicative bureaucratic structures and organizations is wasteful and unnecessary.

Redesign/integration also proposes the establishment of rural satellite delivery locations for workforce development (see “Priority Two” on page 17 of the Northeast Proposed Implementation Plan Report). Pennsylvania’s 15 community colleges currently operate more than 27 campuses and 51 locations, many in rural areas, as part of their mission to increase postsecondary access for all Pennsylvanians. In 2020, the Center for Rural Pennsylvania – a legislative agency of the General Assembly - issued a report that noted the expansive list of opportunities offered by Pennsylvania’s rural community college locations, which includes academic and workforce development programming, GED, basic skills, dual enrollment, and continuing education coursework. The report also found that rural community colleges are uniquely invested in their communities and provide significant economic benefits to the region they serve. Redesign/integration does not acknowledge the services and programs provided by community colleges in rural areas, nor address how the proposed new programming will complement or compete with the existing offerings.

Additionally, redesign/integration includes a goal of serving adult students, stating the intent to “re-skill and up-skill through non-degree credentialing courses.” Any plan to serve adult students in the Commonwealth should leverage the expertise of the Commonwealth’s largest provider of education to adult students and noncredit workforce education – its community colleges. In Fall 2019, the average age of a community college student in Pennsylvania was 25, with students ranging from high school through retirement age. Over the years, community colleges have developed programs and services to meet the unique needs of adult students in both academic and workforce development programs, including the nearly 15,000 individuals who enroll in a Pennsylvania community college each year after having already earned a bachelor’s degree.

Not only does redesign/integration not leverage that expertise, but it does not include data demonstrating the demand for the new programming, how the new programming will integrate with and complement existing publicly-funded programming at Pennsylvania’s community colleges, or how the new programming will be less costly or more efficient to deliver.

The recommendation to develop new online program offerings referred to as the “Global Online Business Plan” in the West Proposed Implementation Plan Report is another area of potential inefficiency and duplication. This recommendation calls for the development and establishment of a new online higher education entity in the Commonwealth. However, the recommendation does not provide evidence of the demand for the programming, does not account for online programming currently offered by Pennsylvania community colleges or other state-funded institutions, and does not explain how the proposed entity would compete with the plethora of national online institutions who are already serving Pennsylvania students and have the advantage of scale and experience.

Pennsylvania’s community colleges have offered high quality online coursework for nearly two decades and have highly rated online course offerings, some consistently ranking in the top 20 iTunes courses worldwide. The colleges also offer more than 150 degree- or certificate-granting programs that can be completed entirely online. Community college virtual course offerings are celebrated by the students who choose to enroll based on their quality and flexibility. Rather than duplicating the current offerings of community colleges, statewide expansion of online higher education should, if needed, focus on baccalaureate degree completion – the upper-level coursework needed to attain a bachelor’s degree in which PASSHE already specializes – rather than on creating duplicative program offerings. It is

imperative that the details of and data supporting the Global Online Business Plan be fully developed – including evidence of unmet demand for online postsecondary education in the Commonwealth - before state resources are expended and potentially wasted on this effort.

Finally, the proposal for the Global Online Business Plan suggests that there will be significant recruitment from K-12 Cyber Schools. Each year, hundreds of Pennsylvania cyber charter school students choose to attend one of Pennsylvania’s community colleges, either in person or online. If the Commonwealth provides funds for PASSHE to actively recruit and market to cyber charter school students – but does not provide funds for community colleges to do the same – it will be funding one public entity to compete with another and will only serve to disrupt and reallocate enrollment, not grow it.

**5. Pennsylvania’s higher education agenda must be aligned to policy goals to provide taxpayers with a return on their investment and ensure good stewardship of public funds.**

Pennsylvania has adopted a postsecondary attainment goal of having 60 percent of the population ages 25-64 hold a postsecondary degree or industry-recognized credential by 2025 with a focus on historically underrepresented populations. However, the Commonwealth’s funding and policy decisions are not in alignment with the attainment goal or other postsecondary goals.

Data provided by the Pennsylvania Department of Education in 2017, for example, showed that the Commonwealth was producing enough bachelor’s degrees and overproducing master’s degrees to meet the Commonwealth’s workforce needs, but was underproducing individuals with sub-baccalaureate credentials -- the credentials that are conferred by community colleges. The colleges acknowledged the demand for community college credentials and requested additional funding to expand high demand programs and eliminate enrollment waiting lists, but the requested funding never materialized. If the Commonwealth wants to meet workforce needs, it must invest in the institutions that provide individuals with the opportunities to attain the credentials that are in demand by employers – its community colleges.

Another area in which policy and funding are not aligned is the development of the state’s healthcare workforce. The Commonwealth currently has a shortage of healthcare workers, and routinely touts the importance and benefits of a highly trained healthcare workforce for the Commonwealth’s economy. Yet, the state does not provide the funding necessary for community colleges to expand their well-established and successful programs. In 2019-2020 alone, community colleges conferred nearly 4,700 awards in healthcare programs, including more associate degrees in nursing than any other sector in the Commonwealth. Additional funding to community colleges or to students would immediately begin to address the state’s healthcare workforce crisis.

Additionally, even as its public sector struggles with erratic and misaligned funding, Pennsylvania supports a wide array of private institutions through the Institutional Assistance Grant (IAG) program, managed by PHEAA. At its inception, the IAG program was designed to provide private institutions resources to diversify their student body. However, it has evolved into a direct subsidy to private colleges and universities and, in 2019-2020, 88 private colleges and universities received more than \$26 million through the IAG program, including some of the most prestigious and well-endowed colleges and universities in the Commonwealth.

**6. Pennsylvania should review existing programs and services and replicate and expand successful programs.**

There are several highly successful collaborations between Pennsylvania community colleges and PASSHE institutions, including 2+2 and 3+1 programs that provide students with an affordable, coordinated pathway to attain a postsecondary degree. These effective collaborations should be reviewed, funded, and scaled across the Commonwealth. Replicating these already-successful programs will leverage existing expertise in both sectors and expand postsecondary access and success for Pennsylvania students more quickly and efficiently than establishing duplicative structures which could take months or even years.

**7. Pennsylvania should consider and review the full array of evidence-based, data-informed, public postsecondary policy options.**

Redesign/integration must consider the full array of public policy and funding options available to increase access, affordability, and completion in Pennsylvania. The current redesign/integration plans make recommendations to address Pennsylvania's higher education affordability crisis, but only in a PASSHE-centric context, without acknowledging the array of other evidence-based policies and strategies that should be considered.

**7A. Pennsylvania should ensure that community college – a major pipeline for all four-year institutions in the Commonwealth, both public and private – remains an affordable option for Pennsylvania students.**

Community colleges are the foundation and entry point for millions of Americans to access higher education. In recognition of this role, 17 states and thousands of local governments and other entities have implemented programs to provide tuition and fee waivers to students to make it possible for them to attend community college. With an average annual 30-credit, full-time tuition rate of \$4,194, community colleges offer an affordable and accessible entry into higher education, but the cost is unfortunately still a barrier for too many students.

Pennsylvania should pursue a program to provide tuition and fee waivers to Pennsylvanians to ensure that cost is not a barrier to attaining a postsecondary credential. By ensuring that community colleges can serve as an affordable entry point to a postsecondary credential, the Commonwealth would be simultaneously making progress towards its attainment goal and increasing the number of students eligible to subsequently enroll in a PASSHE university.

**7B. Pennsylvania should authorize community colleges to confer applied baccalaureate degrees.**

According to the Community College Baccalaureate Association, 23 states currently allow community colleges to offer baccalaureate programs, including Pennsylvania's neighboring states of Ohio, West Virginia, and Delaware. Allowing community colleges to confer applied baccalaureate degrees in fields where they already have facilities, equipment and expertise provides an affordable pathway – particularly in high-demand health and technology fields – for students who cannot afford tuition at other postsecondary institutions and/or are place bound because of family or work responsibilities.

Many students are unable, for a variety of reasons, to pursue a bachelor's degree in a standard, full-time program at a four-year institution. Allowing community colleges to offer bachelor's degrees would offer an opportunity not currently available to thousands of Pennsylvania students each year.

**7C. Pennsylvania should conduct a comprehensive review of its public-to-public transfer policies.**

Pennsylvania should review its transfer policies to identify gaps in the policies and understand student transfer behavior and enrollment patterns. A review of successful transfer policies in other states and how those policies could be applied and replicated in Pennsylvania would also be helpful.

Across the country, public-to-public transfer is an important pathway for community college students to attain a baccalaureate degree. In Pennsylvania, more than 30,000 students who attended a community college transfer to another educational institution each year, with 80 percent of those transferring within Pennsylvania. Yet, even with the existing partnerships with PASSHE institutions designed to facilitate transfer – and the more than 5,375 transfer agreements between Pennsylvania community colleges and PASSHE institutions - PASSHE institutions are not the destination of choice for the majority of community college transfer students.

In Fall 2020, approximately 6,900 students who attended a community college in 2019-2020 enrolled in a PASSHE university; 1,155 of those students transferred with an associate degree. However, 9,000 transferred to a state-related university, 9,323 transferred to a private, non-profit institution, and 6,992 transferred to an institution outside of Pennsylvania. The Fall 2020 data is the continuation of a trend of decreasing transfers to PASSHE universities and increasing transfers to state-related and non-Pennsylvania institutions. This trend is likely due to the lack of a simple, seamless, and easily understood statewide transfer process. Pennsylvania community college students are in high demand by baccalaureate degree-granting institutions, both in and out of state. Those institutions that offer an efficient transfer process continue to be transfer destinations of choice for Pennsylvania community college students.

**7D. Pennsylvania should insist that redesign/integration guarantees Pennsylvania community college completers admission to parallel programs at public universities with full junior standing and priority over out-of-state students.**

In order to reverse Pennsylvania's brain drain to other states, the Commonwealth should adopt policies that keep our most talented and promising students in the state. Unfortunately, existing policies that do not guarantee admission into parallel programs and do not give priority to Pennsylvania applicants push Pennsylvania students to enroll at out-of-state institutions that are more transfer friendly. If Pennsylvania wants to keep Pennsylvania students in Pennsylvania, it must meet and/or exceed the transfer friendly policies of its out-of-state competitors.

**7E. Pennsylvania should prioritize support services for community college transfer students to ensure their success.**

Community college graduates who seek a baccalaureate degree are highly motivated, high



achieving and contribute to the social and cultural diversity of the institutions they attend. As a result, they are in high demand at colleges and universities across the country. Institutions that recognize, celebrate and support community college transfer students with financial assistance and other services continue to be institutions of choice for community college graduates. Public institutions in Pennsylvania should adopt policies and strategies to incentivize community college graduates to enroll.

**7F. Pennsylvania should implement a comprehensive reverse transfer framework among public universities.**

In 2015, Pennsylvania's community colleges and PASSHE signed an agreement to facilitate reverse transfer. However, inconsistent implementation has led to sporadic success and results are well below expectations. Data indicate that each fall semester there are more than 1,000 students enrolling at PASSHE institutions with at least 45 credits and no associate degree; however, only 640 total reverse transfer requests have been submitted to the community colleges since Fall 2015, resulting in only 194 awards conferred in that time. Successful implementation of a reverse transfer pathway would not only help students but also help the Commonwealth reach its credential attainment goal.

Thank you for your consideration of these 12 actionable recommendations to improve public postsecondary education in the Commonwealth.

Redesign/integration offers the Commonwealth an opportunity to make transformational decisions to make public higher education in Pennsylvania work better for the Commonwealth's taxpayers, students, and employers. Any next steps, including redesign/integration, should be based on a comprehensive and strategic approach that considers the full array of public postsecondary options in the state. The actions taken must avoid duplication and inefficiency, consider impacts on other sectors, students and employers, and provide taxpayers with an efficient and highly functional public postsecondary education system that can help the state reach its attainment goal of having 60 percent of the population ages 25-64 hold a postsecondary degree or industry-recognized credential by 2025.

Pennsylvania will get the higher education landscape that it supports. If the Commonwealth allows for a disorganized, duplicative, and costly system of public postsecondary education, it will get a disorganized, duplicative, and costly system of public postsecondary education. However, if a well-considered and more strategic and aligned approach is adopted, the Commonwealth and Pennsylvanians will reap a myriad of benefits.