



Rebuilding America's Middle Class
A COALITION OF COMMUNITY COLLEGES

**RAMC
Executive
Committee**

Glenn DuBois,
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Virginia
Community
College
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Scott Ralls,
President,
North
Carolina
Community
College
System

Thomas
Snyder,
President,
Ivy Tech
Community
College

February 27, 2011

Congresswoman Virginia Foxx
1230 Longworth House Office Building
Washington, DC 20515

Dear Congresswoman Foxx:

On behalf of **Rebuilding America's Middle Class (RAMC)**, we write in strong support for passage of H.R. 2117, Protecting Academic Freedom in Higher Education.

RAMC is a coalition of state community college systems as well as individual community colleges from across the nation – representing over 120 colleges and 1.2 million students – focused on expanding access and success in education.

We support the Administration's goal of improving the quality of higher education in our nation and recognize that several recent regulations finalized by the Department of Education can help accomplish this goal. However, we share your concern that the specific regulations, repealed under your legislation, do little more than expand misplaced and unfounded federal interference into higher education.

In supporting your legislation we join with many in the higher education community who have written to you outlining their concern with the current regulations. In addition to sharing many of their views, we also want to be clear on the specific impact these regulations will have on community colleges.

The first regulation, dealing with state authorization, is particularly problematic to many community colleges that have been expanding distance education offerings. Under the new rules, our colleges must suddenly navigate the laws and regulations in not just the state in which they are located, but in every state in which one of their online students may decide to move. This could mean tracking and having to obtain and maintain state authorization in each of the 50 states to ensure full compliance. At a time when community colleges are doing far more with less funding and keeping college tuition down for our students, we are simply unable to afford the burden of having to repeatedly demonstrate our quality to 50 separate state agencies.

The second regulation, dealing with credit/clock hour issues, is also of major concern among many community colleges. Prior to the regulation, the common understanding among colleges was that straight clock hour programs – which may not be converted to credit hour programs for purposes of Title IV - were those that prepare students for occupations where, for example, a state licensing board requires a certain number of training hours prior to licensure.

Under the new regulations, the Department has created significant uncertainty as to which programs would now be considered straight clock hour and unable to convert to credit hours for Title IV disbursement purposes. In implementing these rules, the federal government will no longer rely on states, institutions and accreditors to determine when a program is clock hour.

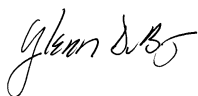
The clear intent of the Department is that many more programs will be limited to the clock hour requirements for the disbursement of federal aid. Unfortunately, the result will be burdensome to both the institutions, particularly community colleges and their students, and will result in including more severe attendance taking requirements, more complicated processes and slower disbursements of Title IV student aid funds to students.

These processes will cause increased uncertainty for individual students about their ability to pay for their education, and may actually reduce the amount of aid available for students in short-term programs.

This clock hour issue is an addition to our general concern, shared by many in the higher education community, that the federal definition of credit/clock hour runs contrary to the Higher Education Act, which expressly prohibits federal interference in academic decisions surrounding curriculum.

For these reasons we again are pleased to offer our strong support for H.R. 2117 which will put an end to these unnecessary regulations and allow community colleges to focus instead on efforts and innovations that will truly drive quality and affordability in higher education across this nation.

Sincerely,



Glenn DuBois
Chancellor
Virginia Community College System



Joe May
President
Louisiana Community & Technical College System



Scott Ralls
President
North Carolina Community College System



Thomas Snyder
President
Ivy Tech Community College