**Comments by Wallace State Community College  (Hanceville, Oneonta, Ala.)**

**Docket ID: ED-2017-OS-0074**

Wallace State Community College joins the American Association of Community Colleges in offering comments to the U.S. Department of Education related to Executive Order 137777, “Enforcing the Regulatory Reform Agenda,” which requests input on regulations that should be repealed, replaced or modified.  We appreciate the opportunity to provide our perspective on the impact of Department of Education regulations that are unnecessarily burdensome given the value of the information gleaned, or that do not achieve a positive effect for students or citizens.

Wallace State endorses the recommendations made in “Recalibrating Regulation of Colleges and Universities: Report of the Task Force on Federal Regulation of Higher Education,” a bipartisan report by senators released in 2015. We urge the administration to use this report as its guide. The development of the report included input from the American Association of Community Colleges, which represents the nation’s 1,108 public community colleges, and the American Council on Education, with membership across the higher education spectrum.  Wallace State also affirms the comments for input related to the current request for comments submitted by American Association of Community Colleges.

In addition to the resources mentioned above, Wallace State would like to highlight several very specific areas related to IPEDS, Title IV and Gainful Employment, where current regulations should be revised.

**Integrated Postsecondary Education Data System** (**IPEDS), 34 CFR 668**

The Human Resources metric has been particularly problematic as college employment numbers are requested for a time period over the course of the academic year rather than for a specific snapshot in time. This measure is next to impossible to report accurately.  For instance, in a given year, a number of employees will retire, resign or be terminated. And many of these employees will be replaced through new hires.  Are we to report two employees for one position because both served in the given time period -- the one who retired and the one who was hired? Or is the report really seeking to know how many unique job titles/positions were active during a given period?  A better measure might be to request data for the number of employees on a given date in time, or an average number of employees over the course of the period.

Secondly, in terms of student success, data are requested for the number of graduates or completers, and separately for the number students who have transferred.  If a student has been reported in the graduate category, he or she cannot also be reported as having transferred.  These categories, however, are not mutually exclusive in the reality of the student experience.  Some students graduate and enter the workforce, others graduate and transfer, and still others transfer without graduating.  As we have focused on completion, Wallace State’s number of graduates has risen in the IPEDS cohort, to its most recent rate of 38 percent.  However, while 25 percent of our students transfer, we are only able to report that 10 percent do, since 15 percent of those also graduated. This feels punitive, both to the college, which has a reputation as an outstanding place for students seeking academic-transfer opportunities, and to the students represented in these numbers, whose story is not accurately told.  Many of our students graduate and transfer, and should be reported as such.

**Title IV - Student Loans, 34 CFR Parts 30, 668, 674, 682, and 685**

The authorization of year-round Pell provides much-welcomed relief to community college students, especially those who are motivated to finish more quickly, and those enrolled in programs that require year-round attendance. The Pell funds awarded to students are rightly tied to the intensity of enrollment. A student enrolled part-time is awarded an amount of Pell proportional to that part-time status, so that students attending half time, are awarded half as much Pell as a student with the same level of eligibility attending full time.  However, Title IV funds in the form of federal student loans have no such proportionality.  We believe this puts undue risk both on the student, who will be required to repay the loan, and on the college, which is held accountable for repayment. The ability to rack up levels of debt disproportionate to the degree being pursued is not only more likely in the current scheme, but should the part-time student fail to complete, the loan repayments are also much higher than is necessary. The availability of such “easy money” teaches poor financial discipline and encourages over-borrowing for the degree.

**Gainful Employment, 34 CFR Parts 600 and 668**

The intent of gainful employment data to provide a picture of the debt-to-earnings ratio for program is admirable. However, as AACC points out, no community college in the U.S. has failed the debt-to-earnings metric. Furthermore, many applied technology courses, which are hands-on in nature and typically have lower enrollments as a result, do not meet the minimum cohort numbers required for some of the questions on the survey. And those that do rely on instructors to track employment in field for graduates from several years prior. What of the graduates who have moved, changed contact information, or otherwise lost touch? Should an instructor guess? Or should they not be reported? The very nature of this requirement would seem to lend itself to inaccurate results. And if inaccurate, then of what value is the metric? Until and unless the collection of earnings data can be automated and tied to tax returns, this measure will always be flawed.

Wallace State has long been an advocate for data-driven decision making. We look forward to the results of this Task Force in crafting regulations that are more streamlined and efficient and that provide more meaningful information to consumers and colleges alike.

Thank you for your consideration of these comments. If you need additional information, please contact Dr. Vicki Karolewics, President, Wallace State Community College.

***About Wallace State***

Wallace State Community College, with campuses in Hanceville and Oneonta, Alabama, is a comprehensive, public community college serving a population of more than 300,000 across a five-county area in north central Alabama that includes Cullman County and parts of Blount, Marshall, Morgan and Winston Counties. This rural area, centrally located approximately 50 miles between the two larger cities of Huntsville and Birmingham, is sprinkled with small towns and communities typical of the southern Appalachian region. Wallace State is an anchor for the communities it serves. Today, the college, which was founded in 1966, enrolls approximately 6,500 credit and non-credit students and offers more than 100 programs of study in academic, health and technical disciplines in addition to a virtually unlimited number of transfer options.

Wallace State is widely recognized as a national pacesetter, twice named among the Aspen Institute’s Top 120 community colleges in America, ranked among the Top 20 in the U.S. for the number of health care graduates produced, and named one of the fastest growing community colleges with enrollments of 5,000 or more by Community College Week. Wallace State was selected by the U.S. Department of Education as a Pell Experimental Site for dual enrollment, and was named a Center for Excellence in Nursing Education by the National League of Nursing, one of only 3 community colleges in the country to earn that distinction. It was one of 30 community colleges selected to lead AACC’s Pathways Project, and is recognized by prestigious membership in Achieving the Dream. Excellence abounds at WSCC, and the primary focus in on student success.