



Council for Adult and Experiential Learning
301 Grant Street #270
Pittsburgh, PA 15219

January 16, 2026

Dear Chair Dr. Shapira, State Board of Higher Education Members, and
Pennsylvania Department of Education Leadership:

The Council for Adult and Experiential Learning is writing to express support for the State Board of Higher Education (the Board) strategic plan. We commend the Board and the Pennsylvania Department of Education (PDE) for developing an ambitious roadmap that addresses the structural challenges facing Pennsylvania's learners and workers while prioritizing long-term outcomes and prosperity.

As a national nonprofit with over 50 years of experience supporting higher education and adult learners, CAEL is pleased to see that adult learners are incorporated into the Board's strategic plan. Headquartered in Pennsylvania, CAEL is dedicated to ensuring lifelong learning and economic mobility through making sure education and workforce systems are responsive to the needs of learners, workers, and employers alike. Our mission centers on engaging with educators, employers, and community leaders to align learning and work so adults achieve continuous long-term career success. We do so by nurturing inclusive partnerships and strengthening the adult learner ecosystem and infrastructure that emphasizes a variety of key principles including skills recognition, equitable access to credentials, and clear, regionally contextualized pathways to quality employment. We commend the plan's overall focus on systems change and alignment, learner-centered design, and outcomes, all deeply aligned with our mission, principals, and stewardship.

As the Board moves into its next phase, we look forward to learning more about the following topics and how they will factor into the plan's implementation:

- **Incorporating strong frameworks that center adult learners' needs** – In recognition of an evolving postsecondary environment, CAEL has long focused on providing guidance on best practices and frameworks ([like our ALLIES framework](#)) that center adult learners' needs within the learning and labor market environment. Centering adult learners lays the groundwork for broader support, from data-driven planning, to bolstering organizational



capacity and policy, to designing, developing and improving the program-and-service design components that the adult learner sees and experiences. This support also lays the groundwork for key policy change across the Commonwealth like credit for prior learning (CPL), which can revolutionize education and career advancement for adult learners, making higher education more accessible and affordable, especially for those with rich life and work learning experiences. We look forward to learning more about how the board plans to incorporate innovative strategies related to frameworks and CPL that can be implemented and scaled within the proposed roadmap.

- **Aligning higher education, workforce development systems, and employers** – CAEL specializes in supporting ecosystems and building on regional economic approaches that bridge the gap between learning and industry. For example, CAEL’s MyCareerForward Initiative in the Pittsburgh region works with entities across the adult learner ecosystem to build connections that support and encourage lifelong learning, and reimagine credentialing, higher education, and workforce training. We look forward to seeing how the board continues to leverage the full ecosystem of higher education and workforce development, including apprenticeships and local workforce boards, to continue to strengthen this connective tissue.
- **Utilizing labor market intelligence to inform pathways, credentials, and outcomes** – CAEL’s work in the Commonwealth has built its foundation on understanding the labor market needs by engaging deeply with employers and industry to identify in-demand occupations, understand regional labor market needs, align skills, and validate credentials that will strengthen talent pipelines. Strategically utilizing labor market information will be essential in driving economic mobility and community prosperity across the Commonwealth. We look forward to learning more about the Board’s strategy to leverage labor market intelligence to inform strong pathways, credentials, and outcomes.
- **Developing shared language and data standards** – transparency and credentials of value aim to make sense of disparate information about a credential and communicate it in a way anyone can access and understand, improving students’ prospects. This requires establishing shared definitions and building the infrastructure that allows data to be shared across systems. These standards will support the development of a robust talent marketplace



that leverages LER's, skills-based hiring, and the gathering of outcomes data for impact measurement. CAEL is committed to enhancing data interoperability for all groups impacting learners and job seekers by providing a connected suite of data-informed tools that track and support the l/earner journey. We look forward to seeing how the Board will address this kind of data-driven strategy within the current road map.

CAEL is deeply appreciative of the inclusive process used to inform this plan, and the thoughtfulness the Board has taken to engage stakeholders to contribute. Please consider us a willing partner and collaborator as the work moves forward.

Thank you for your leadership, and for advancing a thoughtful vision for learners and workers in the Commonwealth of Pennsylvania.

Sincerely,

Earl Buford
President, CAEL



Lehigh Carbon

COMMUNITY COLLEGE

Office of the President

January 13, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education
Forum Building
607 South Drive
Harrisburg, PA 17120

START HERE | GO ANYWHERE

Dear Dr. Shapira,

Lehigh Carbon Community College is pleased to endorse the State Board of Higher Education's Strategic Plan, *Driving a Prosperous Pennsylvania*. For too long, Pennsylvania's higher education sector has operated without a shared, clearly articulated vision to guide how institutions collectively meet the needs of the Commonwealth. This plan provides a timely and much-needed roadmap, along with strategies that promote alignment, coordination, and collaboration across the sector.

For the first time in recent memory, the plan clearly and intentionally affirms the essential role of higher education in meeting Pennsylvania's workforce needs—both statewide and regionally. Community colleges have long served as the strongest workforce development partners within higher education. Our history of close collaboration with employers, K–12 partners, and workforce development boards positions us to continue leading this critical work.

At Lehigh Carbon Community College, we see this commitment reflected daily through our expanding portfolio of employer partnerships. Whether delivering training directly at industry sites through our mobile advanced manufacturing labs—including partnerships with employers such as B. Braun—or providing customized workforce and career-pathway training for Amazon employees as one of only four Advanced Manufacturing Training Centers in the nation, LCCC serves thousands of workers annually to ensure a skilled and adaptable workforce for our region.

The plan's emphasis on ensuring that institutions have the resources and support necessary to meet Pennsylvania's growing workforce demand is essential. This focus bodes well not only for community colleges, but also for the employers, students, and communities we serve.

As a trustee of Lehigh Carbon Community College and on behalf of our Board of Trustees we applaud the State Board of Higher Education for its inclusive and thoughtful approach to developing this plan, grounded in extensive stakeholder input. The result is a strategic framework that earns broad support and shared ownership across the Commonwealth.

Lehigh Carbon Community College looks forward to continued partnership with the State Board as we work together in the months and years ahead to advance the goals of *Driving a Prosperous Pennsylvania* and to strengthen the economic vitality of our region and state.

Sincerely,

A handwritten signature in black ink that reads 'Ann L. Thompson'.

Ann L. Thompson
Trustee, Legislative Liaison

www.lccc.edu

4525 Education Park Drive • Schnecksville, PA 18078-2502 • 610-799-2121



Career Ready Lancaster!
Lancaster Workforce Development Board
1046 Manheim Pike
Lancaster, PA 17601
717-735-0333 • careerreadylancaster.com

January 19, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education

Re: Support for Statewide Priorities in Higher Education

Dear Dr. Shapira and Members of the Pennsylvania State Board of Higher Education:

On behalf of Career Ready Lancaster!, thank you for the opportunity to comment on the Commonwealth's draft strategic plan, Driving a Prosperous Pennsylvania – A Statewide Agenda for Higher Education. The priorities outlined in the plan reflect the vital role higher education plays in preparing Pennsylvanians for meaningful careers and supporting the long-term economic well-being of our communities.

Career Ready Lancaster! is a business–education partnership dedicated to aligning talent with industry needs across Lancaster County. Our work is grounded in the belief that Pennsylvania's workforce is strongest when individuals have access to multiple, interconnected pathways, including apprenticeships, on-the-job training, certificate programs, and higher education. These pathways collectively create a continuum of lifelong learning and skill development essential for a rapidly evolving labor market.

The statewide goals identified in the strategic plan strongly align with workforce conversations in Lancaster County. Our local higher education partners—HACC, Millersville University, Thaddeus Stevens College of Technology, and Franklin & Marshall College—are actively collaborating to respond to emerging workforce needs, embrace flexibility, and support the paradigm shift required to meet industry demand.

A coherent statewide strategy—combined with strong regional partnerships—positions

Pennsylvania to expand opportunity, respond to labor market shifts, and ensure a competitive, future-ready workforce.

Career Ready Lancaster! encourages higher education leaders to collaborate with local workforce systems to create industry focused stackable credentials that build bridges between industry and education and provide a faster track to advancement and career growth with more on and off ramps.

Career Ready Lancaster! strongly supports the goals of Driving a Prosperous Pennsylvania and welcomes continued collaboration as the plan moves toward implementation. Thank you for your leadership and dedication to strengthening higher education and the Commonwealth's future workforce.

Sincerely,

A handwritten signature in black ink that reads "Kimberley Patrick". The signature is written in a cursive, flowing style.

Kimberley A. Patrick

Coordinator Career Ready Lancaster!



January 14, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education (SBHE)

Dear SBHE Board of Directors,

Pennsylvania has the resources, the people, and the ideas to become a leader in education and workforce development.

In 2024, the Governor and the General Assembly took important steps to ensure that Pennsylvania leads the nation in workforce development and education through bipartisan legislation establishing the State Board of Higher Education (SBHE).

The law aligned Pennsylvania's many education, economic, and workforce institutions with a common mission: "To provide direction, coordination, and support to ensure that institutions of higher education fully meet the workforce and economic development needs of this Commonwealth and ensure that all residents of this Commonwealth have access to affordable, world-class postsecondary education."

Pennsylvania is a commonwealth with many of the best schools and training opportunities in the country, but we have been stymied by a lack of coordination and vision.

With the creation of the SBHE and the recent draft release of "Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education," we now have a roadmap to ensure our institutions serve the needs of our residents and businesses. I applaud SBHE for crafting this vision that the Commonwealth has not had for over 20 years.

As workforce development professionals, we especially appreciate the focus on workforce and training. Our workforce boards and partners work in the community every day, connecting workers, businesses, and job seekers, and ensuring we have the right interventions to build a strong workforce that powers our communities.

Unfortunately, we are often left out of the conversation about higher education. Now, with the launch of the SBHE's strategic plan, we have the opportunity to connect our workforce systems to our broader educational system so that businesses can have a voice in education and workers can have many pathways to a good career.

We especially appreciate that one of the six strategic goals of the plan is to "Support the Workforce Development Needs of the Commonwealth," and that, across many of the other goals, there is recognition that postsecondary credentials are more than just college degrees.

As the SBHE develops its implementation priorities and process, we want to work with them to ensure higher education pathways aligned to good careers that fairly and equitably account for past experience and hands-on training. Further, we are grateful that the SBHE identifies that we need to expand enrollment in career and technical education (CTE) aligned with workforce-ready credentials. We need more seats at our Career and Technical Centers and more funding for these programs.



Many points in the strategic plan correctly identify the need for local and regional approaches that fit with the communities they serve. The plan also notes that some regions might not have the full range of career pathways their residents need. We encourage you to work with your local workforce boards as you understand the local workforce and economic conditions. They are truly the boots on the ground in their communities. They know the pathways available - and those that job seekers need - and they have a deep understanding of the local businesses and what types of workers will help them grow and succeed.

At a time when talent attraction and retention are at the forefront of businesses' workforce challenges, it is imperative that higher education is in alignment with those needs in offering short term credential programming or working alongside businesses to create such pathways. That is the space that local workforce development boards can assist in leveraging partnerships and collaborative efforts that enhance the business community and higher education effectiveness.

Strengthening the connectivity of higher education to workforce development also requires consistent data collection, analysis, and application so that decisions are grounded in real labor-time market needs. Actionable, transparent, and local data helps education and workforce partners to coordinate and target investments, expand the right programs, and ensure students have the ability to demonstrate alignment employer demand and compete in today's global economy.

Again, we appreciate the thoughtful work on the strategic plan, and we are ready to help ensure Pennsylvania has the strongest workforce in the nation. We look forward to partnering with the SBHE to execute the strategic plan and ensure there are many pathways to strong careers that reflect local needs in Pennsylvania.

If you would like to discuss the strategic plan or learn more about our local work, we are happy to set up a conversation.

Sincerely,

Anna Ramos

Anna Ramos
Executive Director
Lancaster County Workforce Development Board

Simmons, Michelle

From: Janet Eickhoff <Janet.Eickhoff@jevs.org>
Sent: Tuesday, January 20, 2026 3:49 PM
To: ED, SBHE
Subject: [External] SBHE feedback

ATTENTION: *This email message is from an external sender. Do not open attachments or click links from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Good afternoon,

On behalf of JEVS Human Services, thank you for your work on the Strategic Plan DRAFT. We wish to reinforce the importance of establishing stronger region-based priorities that reflect local workforce needs. We also affirm the goal of expanding paid work-based learning opportunities as a critical strategy for improving student access, completion, and career readiness.

Additionally, we endorse the participation of JEVS Human Services in the development of the Workforce Pell Strategy, given its experience and expertise in aligning education and workforce outcomes.

We appreciate your continued focus on policies that strengthen pathways to employment and economic mobility.

Sincerely,

Janet Eickhoff
Senior Vice President, Career and Technical Education

JEVS HUMAN SERVICES

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January 20, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education (SBHE)

Dear Chair Shapira and Members of the State Board of Higher Education,

On behalf of the North Central Workforce Development Board (d/b/a Workforce Solutions for North Central PA), we appreciate the opportunity to provide comment on the State Board of Higher Education's draft strategic plan, *Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education*.

As the designated workforce development board serving Cameron, Clearfield, Elk, Jefferson, McKean, and Potter Counties, Workforce Solutions for North Central PA is charged with aligning education, training, and workforce strategies to meet the needs of both employers and residents across a largely rural region. Every day, our board, staff, and partners work directly with job seekers, businesses, postsecondary institutions, career and technical centers, and community organizations to strengthen career pathways and support regional economic vitality.

We commend the Governor and General Assembly for establishing the State Board of Higher Education in 2024 and for setting a clear, bipartisan vision to better coordinate Pennsylvania's education, workforce, and economic development systems. SBHE's statutory mission—to ensure higher education fully meets workforce and economic development needs while providing access to affordable, world-class postsecondary education—directly aligns with the work local workforce development boards are tasked with advancing on the ground.

For many years, Pennsylvania has benefited from strong institutions and innovative programs, yet progress has often been limited by fragmented systems and insufficient coordination. The creation of the SBHE, paired with the release of this strategic plan, represents an important opportunity to move from alignment in theory to alignment in practice, particularly at the regional and local levels where workforce needs are most clearly understood.

As workforce development professionals, we are especially encouraged by the plan's explicit focus on workforce preparation and training. Local workforce development boards serve as the connective tissue between education and employment. We convene employers to identify skill needs, invest public funds in training tied to in-demand occupations, and support individuals as they navigate multiple pathways to family-sustaining careers. Too often, workforce boards have been underutilized in higher education planning conversations. The SBHE's strategic framework creates a meaningful opportunity to change that dynamic.

We strongly support the plan's strategic goal to "Support the Workforce Development Needs of the Commonwealth" and its recognition that high-value postsecondary credentials extend well beyond traditional degree programs. In our region, industry-recognized credentials, apprenticeships, short-term

training, and career and technical education are essential to meeting employer demand and expanding opportunity for residents.

As the SBHE moves toward implementation, we encourage intentional collaboration with local workforce development boards to ensure pathways are aligned to good jobs, recognize prior learning and work experience, and reflect the realities of local labor markets. We are particularly grateful for the plan's acknowledgment of the need to expand access to career and technical education aligned with workforce-ready credentials. In North Central Pennsylvania, demand for CTE programming continues to outpace capacity, underscoring the need for additional seats, sustained investment, and coordinated planning.

The strategic plan also correctly emphasizes the importance of local and regional approaches. Workforce development boards bring critical insight into regional economic conditions, emerging industry needs, and gaps in existing pathways. We understand which programs are available, where barriers persist, and how education and training investments can be targeted for maximum impact. Engaging workforce boards as implementation partners will strengthen SBHE's ability to translate statewide goals into effective local action.

Finally, we support the plan's call for stronger data alignment and transparency. Timely, actionable, and locally relevant labor market data is essential for making informed decisions, coordinating investments, and ensuring that students and workers are prepared to compete in a rapidly changing economy.

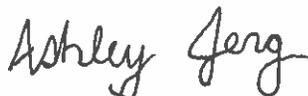
We appreciate the thoughtful work that has gone into this strategic plan and welcome the opportunity to partner with the State Board of Higher Education as it moves forward. Workforce Solutions for North Central PA stands ready to support implementation efforts and to help ensure that Pennsylvania's higher education system is fully connected to workforce needs and local economic realities.

If helpful, we would welcome the opportunity to further discuss the plan or share examples of how regional workforce boards can support their goals.

Sincerely,



Pam Streich
Executive Director
North Central Workforce Development Board
(d/b/a Workforce Solutions for North Central PA)



Ashley Gerg
Chairperson, North Central Workforce Development Board
HR Site Manager, Collins Company – Kane Hardwood Division



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Chester Water Authority
SOLICITOR
Helen J. Esbenshade
Lamb McErlane PC

January 14, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education

Dear State Board of Higher Education—

The Chester County Economic Development Council (CCEDC) commends the State Board of Higher Education for developing a strategic plan for higher education that appropriately centers the economic and workforce needs of the Commonwealth. Put simply, the prosperity of Pennsylvania depends in large part on our ability to provide the skills and talents that we need to fuel our economy. *Driving a Prosperous Pennsylvania* charts a path to ensuring that our colleges, technical schools, universities and all forms of higher education have the resources, support, and coordination to meet this challenge.

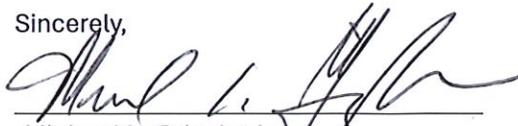
The CCEDC has long been a leader in creating partnerships that support, sustain and expand the economic prosperity of our county and region. We agree with the State Board that there is no “one size fits all.” Economic development efforts must bring together key players across a county or a region to discuss opportunities and challenges informed by robust information and analysis.

Many of the core tenants of this plan are closely aligned with the core principles we have long followed in developing our economic and workforce development programs. A few of those core principles include:

- The emphasis on industry engagement and partnerships. Since 2007, CCEDC has led 5 regional industry partnerships (Ag, Energy, Healthcare, IT, Manufacturing)
- An ecosystem that leverages all forms of higher education is critical to building a world class workforce. This includes universities, colleges, technical schools, community colleges and all degree granting institutions.
- A commitment to developing new pools of workers to fuel business growth. CCEDC’s Project Reconnect achieved success by identifying and helping “near completers” complete their degree or certificate through creative programming and support services.

With the release of this plan, the Board clearly recognizes the need for cross-sector collaboration that focuses on shared goals and priorities. We strongly endorse this plan and look forward to partnering with the Board to ensure its robust implementation.

Sincerely,



Michael L. Grigalonis
President | Chief Operating Officer

PASSHE Press Release

January 2026

PASSHE applauds the SBHE's emphasis on collaboration. Within our own system, we have learned that when universities work together, they can innovate, overcome challenges and better serve students and the commonwealth.

A strong higher education sector is essential to Pennsylvania's future. Employers need skilled workers, and students need affordable, accessible pathways to those careers. Across our own system, our universities share ideas, expand academic opportunities, strengthen student support and deliver high-quality education more effectively. PASSHE has demonstrated the value of collaboration, and we are excited to see what sector-wide collaboration could lead to.

We commend the SBHE for engaging stakeholders throughout the planning process and look forward to continuing this work with all partners to ensure higher education remains a powerful driver of opportunity, workforce readiness and economic growth in Pennsylvania.



January 14, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education (SBHE)

Dear SBHE Board of Directors,

Pennsylvania has the resources, the people, and the ideas to become a leader in education and workforce development.

In 2024, the Governor and the General Assembly took important steps to ensure that Pennsylvania leads the nation in workforce development and education through bipartisan legislation establishing the State Board of Higher Education (SBHE).

The law aligned Pennsylvania's many education, economic, and workforce institutions with a common mission: "To provide direction, coordination, and support to ensure that institutions of higher education fully meet the workforce and economic development needs of this Commonwealth and ensure that all residents of this Commonwealth have access to affordable, world-class postsecondary education."

Pennsylvania is a commonwealth with many of the best schools and training opportunities in the country, but we have been stymied by a lack of coordination and vision.

With the creation of the SBHE and the recent draft release of "Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education," we now have a roadmap to ensure our institutions serve the needs of our residents and businesses.

As workforce development professionals, we especially appreciate the focus on workforce and training. Our workforce boards and partners work in the community every day, connecting workers, businesses, and job seekers, and ensuring we have the right interventions to build a strong workforce that powers our communities.

Unfortunately, we are often left out of the conversation about higher education. Now, with the launch of the SBHE's strategic plan, we have the opportunity to connect our workforce systems to our broader educational system so that businesses can have a voice in education and workers can have many pathways to a good career.



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We especially appreciate that one of the six strategic goals of the plan is to “Support the Workforce Development Needs of the Commonwealth,” and that, across many of the other goals, there is recognition that postsecondary credentials are more than just college degrees.

As the SBHE develops its implementation priorities and process, we want to work with them to ensure higher education pathways aligned to good careers that fairly and equitably account for past experience and hands-on training. Further, we are grateful that the SBHE identifies that we need to expand enrollment in career and technical education (CTE) aligned with workforce-ready credentials. We need more seats at our Career and Technical Centers and more funding for these programs.

Many points in the strategic plan correctly identify the need for local and regional approaches that fit with the communities they serve. The plan also notes that some regions might not have the full range of career pathways their residents need. We encourage you to work with your local workforce boards as you understand the local workforce and economic conditions. They are truly the boots on the ground in their communities. They know the pathways available - and those that job seekers need - and they have a deep understanding of the local businesses and what types of workers will help them grow and succeed.

Strengthening the connectivity of higher education to workforce development also requires consistent data collection, analysis, and application so that decisions are grounded in real labor-time market needs. Actionable, transparent, and local data helps education and workforce partners to coordinate and target investments, expand the right programs, and ensure students have the ability to demonstrate alignment employer demand and compete in today’s global economy.

Again, we appreciate the thoughtful work on the strategic plan, and we are ready to help ensure Pennsylvania has the strongest workforce in the nation. We look forward to partnering with the SBHE to execute the strategic plan and ensure there are many pathways to strong careers that reflect local needs in Pennsylvania.

If you would like to discuss the strategic plan or learn more about our local work, we are happy to set up a conversation.

Sincerely,



Susan Richmond

Director, NWPA Job Connect (NW PA Workforce Development Board

814-807-2627

srichmond@nwpajobconnect.org





**University of Pennsylvania Comment on “Driving a Prosperous Pennsylvania: A
Statewide Agenda for Higher Education”**

We are deeply appreciative of the Pennsylvania State Board of Higher Education’s (SBHE) leadership in advancing this historic initiative, particularly at a time when higher education is confronting unprecedented challenges. The development of a statewide strategy for higher education marks a transformative moment for Pennsylvania and reflects a renewed commitment to the vital role our colleges and universities play in driving innovation, strengthening the Commonwealth’s workforce, and sustaining the well-being of our communities.

There are many important goals and initiatives contained in the proposed strategic plan. But there is one critical constituency that is not specifically mentioned in the plan but that is critical to achieving each of its goals: **Pennsylvania's international students**.

Supporting and expanding international student enrollment would directly advance four of the five statewide goals. International students are not a peripheral concern, they are essential. The Commonwealth’s international students **1) increase affordability for Pennsylvanians; 2) support economic development; 3) support workforce development; and 4) strengthen fiscal health and stability of the higher education sector**. International students are also important in achieving an unstated but important additional goal: raising state prestige and enhancing the overall value of a degree earned in the Commonwealth.

Accordingly, our core suggestion is to include in the strategic plan efforts to attract and retain international students, including by 1) advocating for policies that do so at the federal level; 2) developing broad outreach strategies to signal to prospective international students that the Commonwealth welcomes them; and 3) considering developing a program that would encourage talented international students to remain in Pennsylvania after finishing their degrees and start companies to drive the Commonwealth’s economic development (more details on this are provided at 2) Supporting Economic Development).

We believe that these measures will advance the goals of the strategic plan in the following ways:

- 1) **Increasing affordability:** Researchers have studied the economic benefits of enrolling international students, who often pay full, out-of-state tuition. These tuition

dollars directly increase revenue of higher education institutions while enabling institutions to offer reduced tuition through grants and scholarships to Commonwealth students thereby increasing domestic enrollments. One study estimates “that 10 additional international students increase domestic enrollment by roughly 8,” with public universities utilizing cross-subsidization at a higher rate than private universities.¹

- 2) **Supporting economic development:** International students and international faculty can help the Commonwealth achieve its goals to retain industry and innovation, maximize the impact of universities in research, innovation and economic development, and increase overall research and development. More than 50% of international students enroll in Science, Technology, Engineering, and Medicine (STEM) programs, versus 20% of US domestic students, meaning that international students are essential to bringing STEM skills to Pennsylvania. At the University of Pennsylvania, international students account for less than one-quarter of total enrollment but make up one-third (32%) of Penn’s total STEM program enrollment, including 36% of enrollment in PhD and research master’s degree STEM programs. Moreover, international students become international faculty. The Massachusetts Institute of Technology notes that 40% of its faculty is foreign-born, a statistic that would likely be similar at all major research universities with intensive STEM training programs. As graduate students and then faculty they serve as key links to international collaborations and research investments from domestic and international funders.

A truly transformative initiative would incentivize international graduates to remain in Pennsylvania for optional practical training (OPT) and encourage them to start companies and innovate in PA. A Pennsylvania office dedicated to promoting innovation in the state would provide resources and benefits to employers looking to retain talent in the Commonwealth, including assistance with transition visas from OPT to H1B status. Such an initiative could also be used to recruit international talent from other states, such as Texas or Florida, where local laws are not as receptive to high-skilled international talent.

- 3) **Supporting workforce development:** The White House² has found that the US needs to significantly increase the number of graduates trained in Artificial Intelligence (AI)

¹ Kevin Shih, “Do international students crowd-out or cross-subsidize Americans in higher education?,” *Journal of Public Economics*, Volume 156, 2017, Pages 170-184, ISSN 0047-2727, <https://doi.org/10.1016/j.jpubeco.2017.10.003>.

² See The White House, “Winning the Race: America’s AI Action Plan,” July 2025, available at <https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf>

to compete with countries like China and India. Currently, that need can only be met if we maximize training of both American and foreign students. The Commonwealth could be in the vanguard of recruiting the best students to serve workforce needs in AI, life sciences, environmental technology, and other fields that anticipate workforce needs of the future.

- 4) **Strengthening fiscal health and stability of the higher education sector:** International students have contributed an estimated \$2.2 billion dollars Pennsylvania’s economy last year. There are 50,000 international students currently in the Commonwealth, representing almost 13% of the enrolled student population, and whereas the state’s ability to attract domestic students to apply and enroll is limited by demographic realities, international students offer an almost limitless supply of additional talent.

Finally, and importantly, **international students enhance the prestige and global value of a degree earned in the Commonwealth.** They ensure global brand recognition both for their institutions and for the state at large that translates into tourist and global investment dollars over time. The Commonwealth’s flagship university, Penn State, promises a degree that is “earned locally” and “recognized globally” (See Figure 1). An intentional approach to recruiting and retaining international students ensures that the state of Pennsylvania can penetrate markets in the most innovative and economically developed countries and territories around the world, without a single cent expended by the state or its industries on marketing and business development.

A blue rectangular graphic with white and orange text. The main headline reads "Get a degree locally that's recognized globally." Below this, smaller text says "Learn about the 14 bachelor's degrees offered at Penn State Brandywine, along with internships, student clubs, athletics, on-campus housing and more." At the bottom left is the Penn State Nittany Lion logo, and to its right is the text "PennState Brandywine". At the very bottom is the URL "brandywine.psu.edu/visit-us".

**Get a degree
locally
that's
recognized
globally.**

Learn about the 14 bachelor's degrees offered at Penn State Brandywine, along with internships, student clubs, athletics, on-campus housing and more.

 **PennState
Brandywine**

brandywine.psu.edu/visit-us

Figure 1

Thank you for considering Penn Global’s comment on this important proposal. We look forward to partnering with the State Board and the Pennsylvania Department of Education to advance higher education in the Commonwealth, and would welcome opportunities to develop further and implement the suggestions contained in this comment.



January 20, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education

Dear Chair Shapira,

On behalf of the City of Philadelphia's Mayor's Office of Education, I write to strongly endorse the State Board of Higher Education's Strategic Plan. The plan charts a bold and necessary course towards ensuring that Pennsylvanians have access to the kinds of world-class college options they need to meet their full potential.

Mayor Parker has an ambitious vision for Philadelphia with "Economic Opportunity for All" being a driving force of all her initiatives. Economic opportunity, however, requires clear workforce pathways that connect postsecondary education and training. The Board's Strategic plan will help us meet her vision with its emphasis on affordable and stackable college credential pathways. Put simply, the cost of college is beyond the reach of too many Philadelphians and we need affordable pathways for economic opportunity.

I applaud the Strategic Plan's emphasis on dual credit offerings—particularly those focused on postsecondary credentials aligned with good-paying jobs. Dual credit programs are one of the best ways to reduce the amount of time it takes our students to get a credential. Additionally, by building relationships between higher education, labor, and employers, students will be able to gain hands on work experience. We encourage the state to also allocate dedicated funding for dual credit programs and for programs that allow students to gain hands on career preparation experiences during their postsecondary education.

The plan's emphasis on collaboration, coordination and transparency is very important. Philadelphia is blessed with many colleges and universities, but it can be difficult for residents to understand and compare options. The State Board of Higher Education can play a critical role in making this information more uniform and transparent. By encouraging institutions to work together to share information and guidance, the process of determining whether and where to go to college or access training after high school, will become easier and more transparent. Data collection and transparency will be vital to the success of these efforts.

I congratulate the Board for developing a common-sense plan for higher education in Pennsylvania. Thank you for reviewing our comments. With dedicated attention to this plan, and adequate resources, it will help us achieve economic opportunity for all.

Sincerely,



Dr. Debora Carrera, Chief Education Officer
Mayor's Office of Education
City of Philadelphia

215-847-5626 | Debora.Carrera@phila.gov
30 S. 15th Street, 18th Fl, Philadelphia

Debora Carrera, Ed.D., Chief Education Officer **Sharon Ward**, Deputy Chief Education Officer

January 20, 2026

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education (SBHE)

Dear SBHE Board of Directors,

Pennsylvania has the resources, the people, and the ideas to become a leader in education and workforce development.

In 2024, the Governor and the General Assembly took important steps to ensure that Pennsylvania leads the nation in workforce development and education through bipartisan legislation establishing the State Board of Higher Education (SBHE).

The law aligned Pennsylvania's many education, economic, and workforce institutions with a common mission: "To provide direction, coordination, and support to ensure that institutions of higher education fully meet the workforce and economic development needs of this Commonwealth and ensure that all residents of this Commonwealth have access to affordable, world-class postsecondary education."

Pennsylvania is a commonwealth with many of the best schools and training opportunities in the country, but we have been stymied by a lack of coordination and vision.

With the creation of the SBHE and the recent draft release of "Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education," we now have a roadmap to ensure our institutions serve the needs of our residents and businesses. I applaud SBHE for crafting this vision that the Commonwealth has not had for over 20 years.

As workforce development professionals, we especially appreciate the focus on workforce and training. Our workforce boards and partners work in the community every day, connecting workers, businesses, and job seekers, and ensuring we have the right interventions to build a strong workforce that powers our communities.

Unfortunately, we are often left out of the conversation about higher education. Now, with the launch of the SBHE's strategic plan, we have the opportunity to connect our workforce systems to our broader educational system so that businesses can have a voice in education and workers can have many pathways to a good career.

We especially appreciate that one of the six strategic goals of the plan is to "Support the Workforce Development Needs of the Commonwealth," and that, across many of the other goals, there is recognition that postsecondary credentials are more than just college degrees.

As the SBHE develops its implementation priorities and process, we want to work with them to ensure higher education pathways aligned to good careers that fairly and equitably account for past experience and hands-on training. Further, we are grateful that the SBHE identifies that we need to expand enrollment in career and technical education (CTE) aligned with workforce-ready credentials. We need more seats at our Career and Technical Centers and more funding for these programs.

Many points in the strategic plan correctly identify the need for local and regional approaches that fit with the communities they serve. The plan also notes that some regions might not have the full range of career pathways their residents need. We encourage you to work with your local workforce boards as you understand

the local workforce and economic conditions. They are truly the boots on the ground in their communities. They know the pathways available - and those that job seekers need - and they have a deep understanding of the local businesses and what types of workers will help them grow and succeed.

At a time when talent attraction and retention are at the forefront of businesses' workforce challenges, it is imperative that higher education is in alignment with those needs in offering short term credential programming or working alongside businesses to create such pathways. That is the space that local workforce development boards can assist in leveraging partnerships and collaborative efforts that enhance the business community and higher education effectiveness.

Strengthening the connectivity of higher education to workforce development also requires consistent data collection, analysis, and application so that decisions are grounded in real labor-time market needs. Actionable, transparent, and local data helps education and workforce partners to coordinate and target investments, expand the right programs, and ensure students have the ability to demonstrate alignment with employer demand and compete in today's global economy.

Again, we appreciate the thoughtful work on the strategic plan, and we are ready to help ensure Pennsylvania has the strongest workforce in the nation. We look forward to partnering with the SBHE to execute the strategic plan and ensure many pathways to strong careers reflect local needs in Pennsylvania.

If you would like to discuss the strategic plan or learn more about our local work, we are happy to set up a conversation.

Sincerely,

A handwritten signature in black ink that reads "Hugh Patrick Clancy". The signature is written in a cursive style and is underlined with a horizontal line.

Hugh Patrick Clancy
President & CEO
pclancy@philaworks.org



Governor Josh Shapiro
Commonwealth of Pennsylvania
Co-Chair, Board of Directors

Tiffany Wilson
President & CEO, Science Center
Co-Chair, Board of Directors

January 14, 2026

Chair Cynthia Shapira
Pennsylvania State Board of Higher Education
607 South Drive
Harrisburg, PA 17120

Dear Chair Shapira and Members of the Board,

I appreciate the opportunity to submit comments on the draft strategic plan, *Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education*. I commend the Board for developing a thoughtful, data-informed, and forward-looking framework at a pivotal moment for both higher education and the Commonwealth's economy.

I write particularly in support of Goal Three: Supporting the Economic Development Needs of the Commonwealth, which I believe is foundational to the success of the entire plan.

As President and CEO of Team Pennsylvania, I have the privilege of working across sectors and regions to advance Pennsylvania's long-term economic competitiveness. From that vantage point, I strongly agree with the plan's central premise: that higher education must be fully integrated into regional and statewide economic development strategies if Pennsylvania is to meet current and emerging challenges.

The draft plan appropriately recognizes that Pennsylvania's colleges and universities are critical contributors to talent development, research and innovation, entrepreneurial ecosystems, and regional economic vitality. Just as importantly, it acknowledges that these contributions are maximized when institutions are aligned with industry needs, regional strategies, and public-sector priorities.

Team Pennsylvania strongly supports the plan's emphasis on:

- embedding higher education in cross-agency economic development efforts,
- strengthening regional partnerships,
- supporting research commercialization and innovation,
- and retaining talent educated in Pennsylvania.



These priorities mirror what we see on the ground: that economic competitiveness increasingly depends on coordination, speed, and trust — not simply on the strength of individual institutions or programs.

As the Board moves toward implementation, I encourage you to note the importance of durable, nonpartisan intermediaries that can support this work over time. Organizations that are able to convene partners across sectors, broker relationships, and pilot collaborative approaches can help translate the plan's goals into measurable early outputs and eventual outcomes, particularly in fast-evolving sectors and regions experiencing economic transition.

Finally, I commend the Board for its explicit recognition of regional variation across the Commonwealth. Pennsylvania's economic future will be built in many different places, and higher education strategies must be flexible enough to reflect local context while advancing shared statewide objectives.

Thank you again for the opportunity to comment on this important work. Team Pennsylvania stands ready to support the Board's efforts and to collaborate where helpful as this strategic agenda moves forward.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Abby L. Smith', written in a cursive style.

Abby L. Smith
President and CEO
Team Pennsylvania

January 14, 2026

Pennsylvania State Board of Higher Education
607 South Drive
Harrisburg, PA 17120
EMAIL: RA-EdSBHigherEd@pa.gov

RE: SBHE Draft Plan Public Comment

The Pennsylvania State Education Association (PSEA) represents over 177,000 educators throughout the Commonwealth with several thousand working in the higher education sector. PSEA members value having their voice heard “as leaders in the profession,” opportunities for “professional growth and expertise. ...equitable resources and opportunities for all students, ... and integrity” ([PSEA Values](#)). Driven by these values, PSEA reviewed the Draft Strategic Plan of the State Board of Higher Education (SBHE) to ensure that the proposed leadership of the Board reflected these values.

PSEA applauds the work of the SBHE in creating a stakeholder-responsive strategic plan, and suggests the Board consider the following additional items in the context of the identified existing goals.

Goal 1: Increase Postsecondary Credential Attainment

Goal 3: Support the Economic Development Needs of the Commonwealth

Recommend Policies and Practices to Retain In-State Students

The current plan highlights policies to attract out-of-state students but does not begin with focused efforts within Pennsylvania. PSEA recommends that the SBHE examines how other states are working to incentivize students to pursue postsecondary credentials within their home state, review prior and current proposed legislative language, and collect/analyze data to track number of high school students that gain post-secondary credentials in- versus out-of-state to evaluate the efficacy of any related programs. We further encourage the SBHE to include any such data in data dashboards to continue their ongoing focus on transparency.

Goal 4: Support the Workforce Development Needs of the Commonwealth

Include K-12 Schools in the Dissemination of Workforce Gap Information

The data relating to regional and state-wide workforce and credential gaps presented in the Strategic Planning Public Hearings was new information to many stakeholders in K-12 education. While some of this data is regularly shared with Career and Technical Schools, proactive efforts to disseminate information to all schools would facilitate a more comprehensive effort to support workforce development throughout the educational journey of the Pennsylvania’s future workforce: our K-12 students.

Goal 5: Ensure Accountability and Efficient Use of State Funds

Ensure Metrics Reflect the Differences in Students and Purposes between Institutions

PSEA appreciates the efforts to ensure transparency and integrity through data yet shares implementation concerns expressed during several public comment sessions and in the former Master Plan for Higher Education. Different forms of higher education meet vastly different needs. For example, data on degree completion, time-to-degree, or year-to-year retention may be useful in the evaluation of four-year colleges and trade schools, but misleading in community colleges serving students on more of a nonuniform basis to complete skill upgrades or certifications. Others like post-graduate earnings vary widely by field and can misinform stakeholders who see lower pay from schools preparing teachers, nurses, or civil servants as compared to those specialized in engineering and pharmacology.

Goal 6: Strengthen the Fiscal Health and Stability of the Higher Education Sector

Maintain Focus on Supports, not Facilitation, of Mergers/Closures

PSEA recognizes that when institutes of higher education face financial distress, mergers and closures sometimes become the only viable option. Stakeholder-focused support during these trying situations is critical and a necessary function of the SBHE and related agencies. PSEA urges the SBHE to set clear guidelines and procedures to ensure their supporting work does NOT cross the line into facilitation of such options. Mergers and closures should remain the decision of the institute and, in most cases, a last resort. As such, the role of the SBHE is to help those facing such circumstances or to support institutions so that they may avoid them.

As fellow education stakeholders who value our system of postsecondary and higher education, PSEA remains committed to lifting up the voices of members across the state. We thank the SBHE for the extensive public outreach and ongoing stakeholder engagement exhibited in the development of this Draft Strategic Plan. PSEA expresses our sincere thanks for the continued efforts to include the voice of public education in Pennsylvania in the work of the Board. Please don't hesitate to contact PSEA if you have any questions regarding our comments.

Sincerely,

Aaron Chapin
President



205 House Avenue, Suite 101, Camp Hill, PA 17011 | info@pawork.org | www.pawork.org

Dr. Cynthia Shapira, Chair
Pennsylvania State Board of Higher Education (SBHE)

Dear SBHE Board of Directors,

Every day, we work to make Pennsylvania's workforce the strongest in the nation. We partner with local workforce development boards and other workforce partners to ensure our policies are responsive to local needs and that our boards are equipped to train, connect, and lead.

At the Pennsylvania Workforce Development Association, we understand that local voices matter and each region of our commonwealth is unique.

For many years, a one-size-fits-all approach to education has hindered workforce development. We have long advocated for greater coordination and a stronger emphasis on multiple pathways for Pennsylvanians seeking to build their careers.

We are encouraged that the Governor and the General Assembly created the State Board of Higher Education (SBHE) through bipartisan legislation. They have empowered it to align Pennsylvania's education, economic, and workforce institutions under a common mission: "To provide direction, coordination, and support to ensure that institutions of higher education fully meet the workforce and economic development needs of this Commonwealth and ensure that all residents of this Commonwealth have access to affordable, world-class postsecondary education."

With the creation of the SBHE and the recent release of the draft "Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education," we now have a roadmap to ensure our institutions serve the needs of our residents and businesses.

As the statewide association representing local workforce development boards, we particularly value the focus on workforce and training. Our members connect workers, businesses, and job seekers every day, ensuring communities have the support they need to build a strong workforce.

Local workforce boards and professionals have valuable insights that are often missing from higher education discussions. The SBHE's strategic plan is an opportunity to connect workforce systems and education, ensuring businesses influence education and workers have access to multiple strong career pathways.

We appreciate that one of the plan's six strategic goals is to "Support the Workforce Development Needs of the Commonwealth," and that postsecondary credentials are recognized as more than college degrees across other goals.

As the SBHE develops its implementation priorities and process, we want to work with them to ensure higher education pathways are aligned to good careers that fairly and equitably account for past experience and hands-on training. Further, we are grateful that the SBHE identifies that we need to expand enrollment in career and technical education (CTE) aligned with workforce-ready credentials. We need more seats at our Career and Technical Centers and more funding for these programs.

Many points in the strategic plan correctly identify the need for local and regional approaches that fit with the communities they serve. The plan also notes that some regions might not have the full range of career pathways their residents need. We encourage you to work with your local workforce boards, as you understand the local workforce and economic conditions. They are truly the boots on the ground in their communities. They know the pathways available - and those that job seekers need - and they have a deep understanding of the local businesses and what types of workers will help them grow and succeed.

Strengthening the connectivity between higher education and workforce development also requires consistent data collection, analysis, and application so that decisions are grounded in real labor-market needs. Actionable, transparent, and local data help education and workforce partners coordinate and target investments, expand the right programs, and ensure students can demonstrate alignment with employer demand and compete in today's global economy.

We appreciate the work that has gone into this strategic plan. The Pennsylvania Workforce Development Association stands ready to support implementation and collaboration. Together, we can strengthen pathways to careers that meet local needs and support economic growth across the Commonwealth.

If you would like to discuss how the SBHE and the Pennsylvania Workforce Development Association can collaborate to implement the strategic plan or learn more about our local impact, please let us know. We hope to meet soon to explore actionable next steps together.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren', with a long horizontal flourish extending to the right.

Lauren Holubec



National Center for the
**APPRENTICESHIP
DEGREE**

Public Comment: *Driving A Prosperous Pennsylvania – A Statewide Agenda for Higher Education* Submitted on Behalf of the National Center for the Apprenticeship Degree (NCAD)

The National Center for the Apprenticeship Degree (NCAD), an initiative of Reach University, appreciates the opportunity to submit this formal public comment in support of Pennsylvania's draft statewide higher education strategic plan, *Driving A Prosperous Pennsylvania*. We commend the State Board of Higher Education (SBHE) for advancing the Commonwealth's statewide strategic plan through a coordinated approach that reflects Pennsylvania's evolving higher education landscape.

NCAD's comments align with the plan's focus on postsecondary attainment (Goal 1), workforce alignment (Goal 4), and accountability and return on investment (Goal 5). We encourage SBHE to explicitly recognize ***Apprenticeships and Apprenticeship Degrees*** as enabling strategies that advance all three goals.

Apprenticeships and Apprenticeship Degrees function as paid, job-embedded pathways intentionally designed to integrate employment, structured learning, and postsecondary credentials or degrees. As reflected in our Goal 1 comments, these models support adult learners, working learners, and place-bound populations by improving persistence, completion, and credential attainment while reducing the financial barriers associated with traditional pathways.

In support of Goal 4, explicitly naming Apprenticeships and Apprenticeship Degrees provides a clear statewide signal that distinguishes these models from internships or short-term workforce programs. Clear language helps align expectations across higher education, workforce, labor, and employers and reduces confusion regarding institutional roles and responsibilities. We also support an inclusive approach that recognizes both registered and non-registered apprenticeship models, allowing flexibility to sequence learning design, employer engagement, academic articulation, and registration in ways that protect quality and sustainability.

As emphasized in our Goal 5 comments, Apprenticeships and Apprenticeship Degrees represent high-return public investments when credentials, employment, and wage outcomes are clearly aligned and transparent. SBHE's coordinating role is well suited to reinforcing shared language, quality expectations, and outcome visibility without prescribing institutional approaches.

NCAD works nationally with state coordinating boards, higher education systems, institutions, employers, and workforce partners to translate strategy into practice through shared frameworks and implementation support. We appreciate SBHE's openness to stakeholder input and welcome continued engagement as Pennsylvania advances this important work.

Respectfully submitted,

Holly Smith, Ed.D.

Executive Director and Vice President of Apprenticeship Degree Design
National Center for the Apprenticeship Degree
An Initiative of Reach University



Dr. Kate Shaw
Executive Director
Pennsylvania State Board of Higher Education
607 South Drive
Harrisburg, PA 17120

United Way of Pennsylvania writes in support of the State Board of Higher Education (SBHE) inaugural strategic plan *Driving a Prosperous Pennsylvania*. We believe that this 10-year plan establishing strategies and goals to develop the state's workforce and economic development through postsecondary investment is vital to financial security and economic mobility of Pennsylvanians across the state.

United Way of Pennsylvania advocates on behalf of the ALICE households. ALICE stands for **A**sset **L**imited, **I**ncome **C**onstrained, **E**mployed – households that earn above the official Federal Poverty Line (FPL), but not enough to afford basic expenses in the county where they live. In 2023, ALICE households and those living in poverty made up an estimated 40% of all households in the state (28% were ALICE and 12% were FPL)¹. A key factor in the number of ALICE households in Pennsylvania is the misalignment between the cost of living and what jobs pay.

Despite most adults in Pennsylvania being employed and most households having at least one working adult, only 22% of the population age 16 and over have a full-time salaried job. Of those participating in the workforce, nearly two-thirds (65%) were paid hourly and/or part time. Of the top 20 most common occupations, twelve were paid less than \$20 per hour. The ALICE population of the workforce continues facing multiple challenges that would make it difficult to secure, retain or

¹ United For ALICE. (2025). *The State of ALICE in Pennsylvania: 2025 update on financial hardship* (Report). United Way of Pennsylvania & United For ALICE.
<https://www.unitedforalice.org/Attachments/AllReports/state-of-alice-report-pennsylvania-2025.pdf>

attain postsecondary credentials and/or education. We urge the SBHE to incorporate the following considerations as it advances the plan's goals and implementation strategies.

ALICE Workers and the Benefit Cliff:

ALICE households earn more than the FPL, thus ineligible for federal benefit programs, but still living paycheck to paycheck. A modest wage increase could result in a sudden loss in childcare subsidies, local housing assistance or healthcare. Many ALICE workers would welcome opportunities for education advancement, but it could come at a steep price. This discourages workers from enrolling in training programs or accepting promotions tied to skills training or credential completion. The “benefits cliff” undermines the growth of the workforce across the board, and we strongly advise the SBHE consider this in its plan implementation and consider strategies on supporting workers and their financial security and mobility as they improve their postsecondary education opportunities.

Cost-Burdened on Rent:

Many ALICE Workers are cost burdened on rent, hurting their housing stability. In 2023, 26% of all renter households below the Threshold in Pennsylvania paid 30% to 49% of their income on housing. These workers will be unable to reduce their work hours for educational programs without jeopardizing their housing. Workforce development programs and efforts will need to take this into account during implementation.

Cost of Childcare:

Childcare costs in Pennsylvania often exceed the cost of in-state college tuition, a major barrier to ALICE parents who want to further their own education pursuits. In addition, parents working nontraditional work hours or shift schedules disproportionately impact ALICE workers in healthcare, hospitality, and service sectors who would need childcare. The SBHE should consider integrating

nontraditional childcare supports in its workforce training programs, so it does not discriminate against workers in certain industries.

Digital Inclusion:

Workforce programs rely heavily on digital systems for registration, enrollment, and credentialing. Unless the ALICE worker has a reliable, broadband connection and up-to-date device at home ready to use, along with a modern level of digital literacy for the program, this is a structural barrier to postsecondary educational and employment success. The SBHE should develop strategies to ensure that ALICE workers can obtain quality modern devices and internet connections for workforce development programs and postsecondary and credentialing programs. We also recommend partnering with organizations that can create 21st century digital literacy curricula to upskill and prepare our workforce.

The goals of the strategic plan are necessary to build up and advance our state's higher education and workforce sectors, however there are the real barriers that ALICE workers face that would disable them from fully participating in or benefiting from the goals in this strategic plan. It is our hope that the SBHE considers addressing these barriers through policy, programs and partnerships to ensure that the implementation of the strategic plan is a success. We welcome the opportunity to work with SBHE as the plan moves forward and offer these comments in support of its goal to reduce barriers to postsecondary access and attainment. We look forward to continued collaboration to ensure the plan's implementation promotes financial security and economic mobility for ALICE workers and all Pennsylvanians.

Sincerely,

Inemesit Melody Zimmerman

Director of Public Policy

United Way of Pennsylvania

mzimmerman@uwp.org

Subject: Public Comment on SBHE Draft Strategic Plan: Scaling Workforce Readiness through Managed Internship Infrastructure.

To: The Pennsylvania State Board of Higher Education (SBHE) RA 0-EDSBHIGHERED@pa.gov

Attn: Strategic Planning Committee

Re: "Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education"

Dear Chair Shapira and Members of the Board,

On behalf of **iQ GovSolutions**, a DBA of **iQuasar LLC**, thank you for the opportunity to provide public comment on the draft strategic plan, "*Driving a Prosperous Pennsylvania.*" As a firm with deep roots in staffing and workforce solutions, we strongly endorse the Board's commitment to aligning higher education with the Commonwealth's economic needs.

In recent months, our team has conducted applied research and analysis focused on Pennsylvania's higher education enrollment trends, workforce participation, and employer talent demand. That work highlights a widening disconnect between education pathways and labor market needs across the Commonwealth, particularly for small and mid-sized employers and for students seeking clear, paid pathways into in-demand careers. The observations below are informed by this Pennsylvania-focused analysis as well as our experience implementing statewide workforce initiatives in other states.

To ensure this plan achieves its maximum potential, we recommend the inclusion of a **statewide, vendor-managed, and subsidized internship model**. This approach directly addresses the Board's goals of **affordability, employability, and regional economic retention**.

Operationalizing the Internship Pipeline

- While the draft plan rightly identifies "increased access to paid work experiences" as a priority, the primary barrier to scaling these opportunities is not a lack of student interest; it is the **administrative and financial burden on small-to-midsized businesses (SMBs)**. Most local employers lack the HR infrastructure to manage recruitment, payroll, and compliance for short-term interns. Implementing a **vendor-administered model** would allow Pennsylvania to establish a shared services framework that removes administrative hurdles, empowering local businesses to focus on developing talent instead of managing paperwork.

Why a Scaled, Paid Internship Model Is Critical to Plan Success

Several data points underscore why a structured, paid internship infrastructure is essential to advancing the draft plan's workforce and affordability goals:

- **Persistent workforce gaps:** Recent labor market data indicate that Pennsylvania has approximately 277,000 job openings but only 186,000 hires, leaving a shortfall of more

than 90,000 workers. This gap reflects not a lack of opportunity, but a breakdown in the connection between students and employers during education and training.

- **Credential–skills mismatch:** Roughly 60% of jobs in Pennsylvania require education beyond high school, yet only 53% of the workforce holds the required credential or degree. Employers consistently report that graduates lack applied, job-ready experience, an issue that paid internships are uniquely positioned to address.
- **Affordability and persistence pressures:** Many students must work while enrolled to cover living expenses. When work experiences are unpaid or poorly aligned to career pathways, students are more likely to delay completion or leave the state altogether. Paid, career-relevant internships reduce reliance on debt while improving retention and completion outcomes.
- **Regional talent loss:** Pennsylvania continues to experience “brain drain,” particularly among highly educated residents. Early attachment to local employers through internships is one of the most effective ways to retain graduates in-state and support regional economic stability.

Together, these conditions suggest that expanding paid internships is not simply a programmatic enhancement; it is a structural requirement for achieving the plan’s workforce, economic development, and affordability objectives.

A Proven Blueprint: The iQ GovSolutions & SCHEV V-TOP Model

Our recommendation is based on actionable success. iQ GovSolutions has served as a key partner for the **State Council of Higher Education for Virginia (SCHEV)** and its **Virginia Talent + Opportunity Partnership (V-TOP)**. Through this initiative, we have demonstrated how a third-party managed model can drive statewide results:

- **Rapid Scale:** In partnership with SCHEV, iQ GovSolutions has already onboarded **200+ employers** and facilitated over **460 student placements**.
- **Administrative Relief:** iQ GovSolutions handles the job description development, candidate sourcing, screening, and most importantly, **serves as the employer of record (payroll/compliance)**. This allows even the smallest local business to participate.
- **Targeted Subsidies:** We manage the distribution of matching funds, ensuring that state investments go directly toward “net new” paid roles, making internships accessible to students who cannot afford to work for free.
- **Retention:** Connecting students with local employers helps prevent brain drain and keeps future workers contributing to the communities they call home.

Recommended Enhancements for the Final Strategic Plan

We urge the SBHE to incorporate the following practical language into **Goal 3 (Economic/Workforce Demand)** and **Goal 2 (Affordability)**:

- 1. Establish a Statewide Internship Intermediary:** Utilize a specialized vendor to act as a central backbone for internship creation, relieving individual institutions of the burden of fragmented employer outreach.
- 2. Incentivize SMB Participation via Subsidies:** Create a wage-match program (e.g., a 50% state match) for interns placed at Pennsylvania-based SMBs, managed through a central staffing partner to ensure transparency and ROI.
- 3. Prioritize "In-Community" Placements:** Focus resources on regional placements to ensure that rural and underserved areas benefit from the talent being cultivated at local colleges and universities.

A statewide, scaled internship model is one of the most measurable ways to improve student return on investment while directly addressing employer demand across the Commonwealth.

To illustrate how these recommendations can be operationalized at scale, the following case study summarizes iQ GovSolutions' role as the statewide internship intermediary for the Commonwealth of Virginia, including implementation strategies, measurable outcomes, and lessons learned in partnership with the State Council of Higher Education for Virginia (SCHEV).

We would be honored to share additional data or insights to support Pennsylvania in building a world-class workforce infrastructure.

Thank you for your leadership and for your dedication to the future of the Commonwealth.

Respectfully,

A handwritten signature in black ink, appearing to read 'Tahir Qazi'.

Tahir Qazi, CEO

Email: Tahir.Qazi@iQGovSolutions.com

Direct: (703) 936-0093

Cell: (215) 350-4712

<https://iQGovSolutions.com/>

❖ Case Study - Scaling Statewide Work-Based Learning

The iQ GovSolutions & SCHEV V-TOP Partnership: A Blueprint for Pennsylvania

➤ The Challenge

Despite a strong desire to hire local talent, many small and mid-sized businesses (SMBs) in the Commonwealth of Virginia faced significant barriers to launching internship programs:

- **Administrative Friction:** Lack of HR capacity to manage recruitment, compliance, and onboarding.
- **Financial Constraints:** Difficulty justifying the full cost of seasonal intern wages.
- **Geographic Gaps:** Rural and underserved regions struggled to connect students with local employers, leading to talent "brain drain."

➤ The Solution: A Managed Staffing Intermediary

The **State Council of Higher Education for Virginia (SCHEV)**, through the **Virginia Talent + Opportunity Partnership (V-TOP)**, designated **iQ GovSolutions** as the central staffing agency to serve as the "shared services" backbone for the state.

Key Operational Pillars:

- **Employer of Record (EOR) Services:** iQ GovSolutions manages payroll, tax compliance, and liability, removing the primary administrative barrier for participating SMBs.
- **End-to-End Recruitment:** We handle job description design, institutional outreach, candidate screening, and interview coordination.
- **Matching Grant Administration:** iQ GovSolutions facilitates a **50% wage subsidy** (up to \$7,500 per intern), ensuring student accessibility and employer ROI.
- **Standardized Quality:** Every internship is vetted to ensure it is career-relevant and meets state learning objectives.

The Impact (FY 2024–2025 Results)

The managed model allowed Virginia to scale work-based learning faster than traditional institution-by-institution outreach.

Metric	FY 2025 Outcome	Year-Over-Year Growth
Employers Onboarded	200+	+66%
Student Placements	300+	+216%

Wage Access	\$17.82 Avg. Hourly Rate	N/A
Institutional Reach	41+ Colleges & Universities	N/A

"iQuasar's role was pivotal in bridging the gap between learning and earning, allowing us to reach employers who previously had no path to hiring student interns." — **V-TOP Program Stakeholder**

Application for Pennsylvania (SBHE)

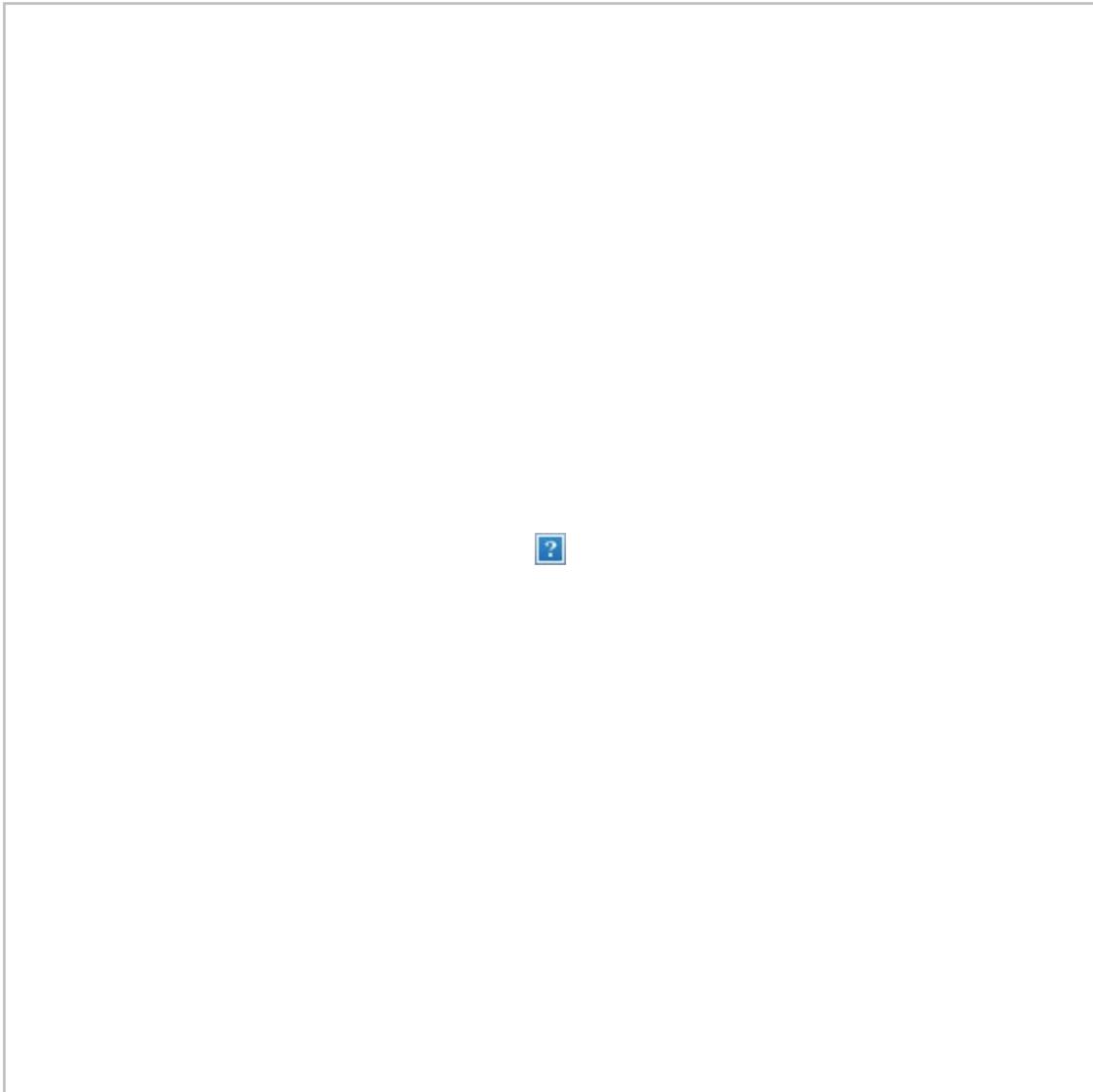
Pennsylvania can replicate this success by incorporating a "Statewide Internship Intermediary" into the **SBHE Strategic Plan**. This model would:

- 1. Lower Entry Barriers:** Allow PA small businesses to hire interns with zero HR overhead.
- 2. Ensure Affordability:** Use matching grants to ensure every internship is a **paid** experience, supporting the Board's affordability goals.
- 3. Retain PA Talent:** Connect students at PASSHE and private institutions directly with local regional employers, ensuring they build professional roots in the Commonwealth before graduation.

For additional data, implementation details, or a briefing on the V-TOP model, SBHE staff may contact the undersigned. Thank you for your consideration.

From: [Thomas Foley](#)
To: [Amann, Carrie](#)
Subject: [External] AICUP Recommendations for the SBHE Strategic Plan
Date: Tuesday, January 20, 2026 4:31:54 PM

***ATTENTION:** This email message is from an external sender. Do not open attachments or click links from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*



January 20, 2026

Members of the State Board of Higher Education,

We write today on behalf of the 80+ independent nonprofit colleges and universities that make up the Association of Independent Colleges and Universities of Pennsylvania

(AICUP) to provide some feedback on the recently released Strategic Plan. We appreciate the board's attention to gathering comments and revising the initial draft in order to move higher education forward to fulfill the workforce needs of the Commonwealth.

First, thank you to Dr. Shaw for spending an hour with seven of our presidents which allowed them to make suggestions and have dialogue about both the contents of the plan as well as the process that will be used as the plan is implemented. We are ready and willing to assist the board as it fulfills its role as a coordinating body. Several areas and ideas that were discussed and everyone agreed about include:

1. SBHE will continue to engage all constituents as policy recommendations are developed – we appreciate that the board will coordinate across sectors and allow for their input to construct policy recommendations to advance the goals. Confirming the importance that all sectors are involved in discussions with the board and staff was especially appreciated to hear.
2. Avoiding unfunded mandates – insuring implementation strategies and recommendations do not lead to additional work that pushes costs onto the institutions.
3. Ensuring recommendations take into consideration outside factors – navigating the continuing federal requirements and changing approaches to funding and policies must be taken into account as policies are recommended.
4. Creating focus/working groups – including all sectors and stakeholders for each overarching goal to provide feedback and suggestions back to the board.
5. Collecting and making available best practices – looking at what institutions are doing across all the sectors to work towards the goals outlined in the plan.
6. Continuing conversations with independent nonprofit higher education – open dialogue and opportunities to gather more feedback during the implementation phase.
7. Reducing antiquated thinking – updating language and definitions to make the meaning clear such as workforce development vs. workforce needs and recognizing that all sectors provide these opportunities in today's world.

We also wanted to provide the entire board with feedback on the plan that ranges from overall high-level comments to some points on specific wording. We have compiled many of the comments that seemed to be recurring among our conversations.

Topic One – Lack of Detail Makes it Difficult to Fully Evaluate the Plan – Although we understand that the plan was intentionally drafted at a high level this approach means that

colleges, students, families, and the general public cannot effectively evaluate the strategic plan because it contains little detail on how goals and policies will be implemented and progress measured. Also, colleges and universities need to understand what will be expected of them once the plan is approved and in place. The plan does not contain enough detail for that.

Recommendation(s)

1. **Create targeted groups to provide feedback throughout the process** – Compile cross-sector, regional focus groups for each of the plan goals who can provide feedback, impacts, and examples of programs that work to the board as the plan is implemented.
2. **Monthly sector calls with SBHE staff** – Continuing communication with the various sectors will allow for additional transparency and feedback.

Topic Two – Recognition that Many Sectors Already Have Successful Programs in Place – Many schools are already engaging in programs that support these goals, recently we [discussed](#) many of these programs in a [public hearing](#). Prior to “reinventing the wheel” we should examine these programs.

Recommendation(s)

1. **Investigate current programs** – Survey schools and businesses to find programs already in place that are working throughout the state and country.
2. **Compile best practices** – Create a repository of best practices that could be replicated across the Commonwealth. Ex: Grant was created for “Parent Pathways” after programs of our schools were analyzed.
3. **Eliminate barriers that exist for partnering** – Currently many schools work together across sectors and with businesses, but sometimes programs and practices make it difficult for this to occur. Here are some examples of [partnerships](#).

Topic Three – Need to Redefine Work Force “Development” – Using the words *workforce “development”* seems to automatically direct folks only to short-term and certification programs and also alludes to job-specific training.

Recommendation(s)

1. **Replace “development” with “needs”** – Workforce “needs” would include ALL workforce no matter what the degree requirements, if the goal is to provide trained workers for every position this wording would reflect that better.
2. **Recognize that all sectors of higher education provide programming ranging from short-term noncredit programs through degrees** – Institutions are

constantly evolving to fill workforce needs and the antiquated belief that each sector provides only one type of postsecondary credential is simply not true in today's world. The plan should explicitly recognize this fact. Filling today's needs requires traditional workforce development AND (not OR) higher education.

3. **Recognize that students need to be trained for the jobs that do not exist yet –** Although it is important to look at the current workforce needs, it is just as important that the plan allows for the rapid changes occurring, especially in the era of AI. The study mentioned in this section was based on data that was relevant prior to AI infiltrating every aspect of life. The accomplishment of a credential is important, but just as important is teaching the student "[how to learn](#)" so they can pivot as the workforce evolves.

Topic Four – Do Not Increase Unfunded Mandates – All sectors already seem to get additional duties which require increased human and funding capital which can take away dollars and staff used to provide services and education to students.

Recommendation(s)

1. **Do not increase data requirements** - Do not add to data collection burdens, costs, and liability issues. Using data already available and collecting this data in the same form and manner saves schools time and money.
2. **Do not increase workloads** - In addition to data, any additional requirements on schools and businesses create barriers that work against the goals of the plan. AICUP schools only receive state funding based on serving students based on income status or funds tied to certain workforce needs. Funding should be tied to actions.

Topic Five – Recognize Outside Factors Such as Federal Changes and Ensure the Plan is Not Implemented in a Vacuum – Schools' workloads are already increasing greatly due to new federal laws, regulations, and policies. There have been over 200 Executive Orders along with the OBBB and other laws that are changing the entire playing field for schools including additional reporting, program ROI calculations, and changes to grants and uses of grant dollars.

Recommendation(s)

1. **Review on a regular basis federal and other areas of the changing landscape –** Bringing each of the sectors to investigate how changes are affecting them prior to implementation processes.
2. **Receive input from other agencies** – The changes across many areas will inform

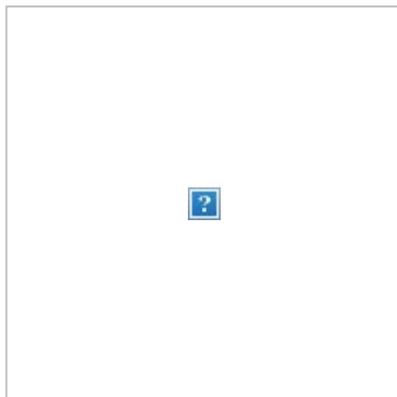
this work, incorporating changes for Student Financial Aid (PHEAA), Healthcare (DHS), Labor (L&I) and others can also improve implementation and reduce further unintended consequences.

We know that the board [realizes](#) how lucky we are in the Commonwealth as higher education is a rich resource that not only provides billions to the state, but also is the second-[best net importer](#) of students and trains the next generation of workers and innovators. These AICUP schools who are an average of 140 years old in 58 communities continue to be an [integral piece](#) of this landscape; these 80+ schools not only provide \$29B and 39K workers to the Commonwealth each year, they also educate 45% of all higher education students, 52% of working-age adult learners, and 46% of the low-income Pell-eligible students and produce the most degrees in STEM (58%), nursing (69%), and teacher certification candidates (45%) of any other sector.

We look forward to continued conversations as policy recommendations are developed.

Thank you for your consideration.

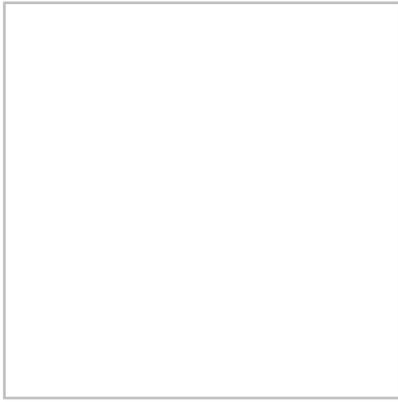
Sincerely,



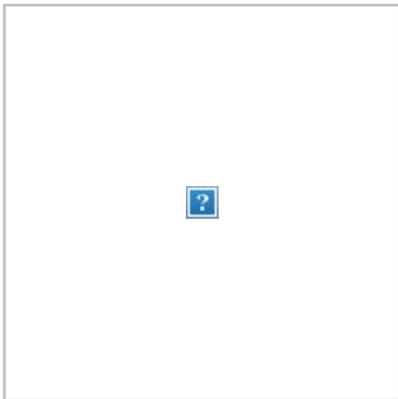
Thomas P. Foley, J.D.

President

AICUP



Nichole Duffy
Senior Vice President of Government Relations
AICUP



Ron Uroda
Vice President of Research
AICUP

On behalf of

Doug Lee, J.D.
Chair, AICUP Board of Directors
President, Waynesburg University

Elizabeth Meade, Ph.D.
Vice Chair, AICUP Board of Directors
President, Cedar Crest College

Chris Domes, Ed.D.
Sec/Treasurer, AICUP Board of Directors
President, Neumann University

Jonathan Green, Ph.D.
Immediate Past Chair, AICUP Board
President, Susquehanna University

Father Paul Taylor, O.S.B., Ph.D.
Chair, AICUP Government Relations
President, Saint Vincent College

Wes Fugate, Ph.D.
Vice Chair, AICUP Government Relations
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Mary Finger, Ed.D.
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Jonathan Peri, Ph.D., J.D.
NAICU Liaison
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AICUP · 101 N Front St · Harrisburg, PA 17101 · USA

SBHE EXECUTIVE BRIEF

Why the Resolution Should Be Added to the January 14 Agenda

Alignment With Driving a Prosperous Pennsylvania

What the Resolution Does

- Prohibits tuition, student fees, and state appropriations from being used for fully discretionary player pay ("revenue sharing").
- Does not restrict NIL, scholarships, Alston benefits, or fundraising.
- Prevents up to \$738 million in new discretionary spending over 10 years.
- Protects students, families, taxpayers, and institutional stability.

Why It Matters

- Player-pay began July 1, 2025.
- Without guardrails, institutions may shift costs to students or rely on state funds.
- This creates upward pressure on tuition, debt, and appropriations.
- The Resolution ensures resources remain tied to instruction and student services.

Direct Alignment With SBHE Strategic Plan Goals

Goal	Description
Goal 1: Attainment	Prevents tuition increases that reduce enrollment and persistence.
Goal 2: Affordability	Avoids new financial burdens on students, especially low-income and first-generation learners.
Goal 3: Economic Development	Protects institutional capacity to support research, innovation, and talent pipelines.
Goal 4: Workforce Development	Ensures funding remains available for workforce-critical programs and credentials of value.
Goal 5: Accountability	Ensures appropriations are used only for permitted purposes under state law. Strengthens transparency and public trust.
Goal 6: Fiscal Stability	Prevents new structural deficits and reduces risk of layoffs or program cuts.

Bottom Line

The Resolution is a common sense, responsible, and fully aligned safeguard that protects students, taxpayers, and institutions. Adding it to the January 14 agenda allows the Board to evaluate it within the Strategic Plan's statewide framework and advisory role.

RESOLUTION FOR ACTION

Resolved: No part of any student’s tuition, student fees nor appropriations from the Commonwealth of Pennsylvania, shall, directly or indirectly, be used for player pay (“revenue sharing”), as contemplated by the settlement in the matter of House v. NCAA.¹

STATEMENT IN SUPPORT OF RESOLUTION ²

Introduction

Adoption of this essential Resolution results in immediate cost and/or debt avoidance to Pennsylvania students, their families and Pennsylvania taxpayers of up to \$738 million.³ It tells 92,000+ commonwealth undergraduate, graduate and professional school students, their families; universities staff and employees and, over 13 million Keystone state taxpayers; that today, members of this Pennsylvania Board of Higher Education has guard railed them from the misuse of student tuition, fees and taxes to fund up to \$20.5MM annually solely to pay professional athletes at Penn State, Pitt and Temple.⁴ Important to bear in mind throughout this statement: There is no statute, case law, regulation or guideline by any public body anywhere requiring this pay. It is purely optional and discretionary.

Note: This Statement In Support is directed to analyzing the impact of the \$20.5MM player pay provision (“revenue sharing”) in the House v. NCAA settlement. It went into effect July 1, 2025. This is pay direct from the university to the player and indistinguishable from pay to any university employee or contractor. Importantly, this pay has no relationship whatsoever to widely reported “Name, Image, Likeness (NIL)” which is a contractual relationship between the player and generally third parties for the use of same. The Resolution neither restricts players entering NIL relationships nor affects any other benefits including scholarships or Alston stipends.

¹ See, <https://www.dukechronicle.com/article/2024/05/duke-athletics-ncaa-house-settlement-nil-revenue-sharing-college-sports-hubbard-carter>

² IMPORTANT: The primary data source for the University of Pittsburgh in this Statement In Support are the Stairs Reports filed annually and overseen by the Joint State Commission. The Stairs Reports are indispensable in any review and assessment of Pennsylvania’s State Related universities. However, the Stairs Reports suffer from an absence of uniformity making comparison of performance between the institutions impossible. Adoption of a uniform template for the reporting universities in the format and substance is recommended at a minimum. <https://www.pa.gov/agencies/education/data-and-reporting/ps-higher-education/the-stairs-report> As to Penn State, the data relied on is from the Knight Commission on Intercollegiate Athletics. Its data base is invaluable in providing the important comparisons herein. Penn State provides vital details on both its funding and expenditures. Neither Pitt nor Temple provide their athletic department financials to the Knight Commission. <https://knightnewhousedata.org/>

³ \$20.5MM @ 4% compound 10 years x 3 (State-Aided FBS PA Universities)

⁴ Penn State in state 2025 – 50,776 <https://www.psu.edu/news/campus-life/story/penn-state-enrollment-remains-steady> -2024 Pitt in state 2025 – 21,546 <https://www.bizjournals.com/pittsburgh/news/2025/10/01/pitt-enrollment-fall-2025-growth.html> Temple in state 2024 - 18,603 <https://ira.temple.edu/sites/ira/files/2024-2025-Factbook.pdf>

I. State-Aided Universities Athletic Department Financials⁵

Penn State and Pitt both committed to fund to the full \$20.5MM/yr player cap effective July 1, 2025 .⁶ Temple, as a member of the American Athletic Conference, is obligated to pay \$10MM/yr for at least the next three years.⁷ Neither Pitt nor Penn State are required by any conference rule or guideline to pay any part of the \$20.5MM player pay. It is discretionary. For important context, the \$20.5MM player pay is a significant hit to athletic department finances at Pitt and Penn State.

The University of Pittsburgh Athletic Department has the 11th largest deficit among all 112 Football Bowl Subdivision schools reporting to the Knight Commission in the nation at \$-45MM in 2024. (Ex .C, D, E). Pitt's cumulative athletics deficit 2019-2024 is over ¼ \$Billion at \$-236MM. (Ex.1, A, B).

As acknowledged in Pitt's Stairs Reports filed annually with the Commonwealth, the athletic deficits are funded 100% from "[T]uition, fees and allocations" (taxes}. That is, students/families mostly in debt (55% of graduates average \$40K debt after four years).⁸

To illustrate, 30,000 Pitt students are funding a \$-45MM deficit. Adding \$20.5MM player pay produces a Pitt deficit of 60.5MM; or, \$10,917 over four years assessed to each student. Given that 55% of Pitt students carry debt of \$40K after four years, a full 27% of their debt is attributable to the questionable practice of funding athletic deficits through student tuition and fees. Even just the \$20.5MM direct pay alone to university athletes adds \$2,733 or 7% to average debt. Incurred solely to pay professional players. Adding this incremental discretionary debt on top of the current financial deficit makes no financial sense and suggests fiduciary duties ignored,

Penn State athletics appear largely self-sustaining. Excepting a 2021 \$-24MM deficit, its athletics have run in the black recording a \$5.6MM surplus 2024, seventh largest surplus of 112 Knight Commission reporting FBS schools nationally. For the period 2019-2024 Penn State records a deficit of \$3.9MM. The source of funding for the 2021 deficit is unknown. Ex. (C, D, E, F, G). Crediting Penn State's 2024 \$5.6MM surplus to the \$20.5MM player pay produces a deficit of \$-14.9MM.

52% of Penn State students graduate with an average \$48K debt.⁹ In the absence of other funding sources, the \$-14.9MM deficit adds \$851 or 2% to average debt.

⁵Neither Temple nor Lincoln report their financials to the Knight Commission and their Stairs Reports data, in their present form, make comparisons problematic and likely impossible.

⁶ See, Penn State AD Pat Kraft letter 6/7/2025 <https://gopsusports.com/news/2025/6/7/house-settlement-letter> Pitt AD Allen Greene 11/21/2025 <https://www.utimes.pitt.edu/news/athletic-director>

⁷ See, <https://www.phillymag.com/news/2025/08/01/college-sports-money/>

⁸ See, <https://www.usnews.com/best-colleges/university-of-pittsburgh-3379/paying>

⁹ See, <https://www.usnews.com/best-colleges/penn-state-6965/paying>

II. Protected Class

A. Students & Families¹⁰

We are all familiar with the challenges of paying tuition and the burden of carrying and repaying this debt in the years following graduation. At Pitt¹¹, about 48% of students are in debt by the end of their first year. 55% by graduation. About \$9,709 per year or \$38,836 in loans over four years.¹²

Within the class, we know that nationwide Black households incur more student debt than white households, 30% vs. 20%. We know student loan defaults are 5x greater in Black families than white. 20% of student loan borrowers in Pennsylvania communities of color are in debt collection vs. 8% of their white counterparts.¹³ Moreover, two decades after graduation the typical white borrower reduces their student debt by 94%. However, the typical Black borrower still carries 95% of their student debt after the same period.¹⁴

Pennsylvania ranks 6th highest nationally of college graduates with 64% in student debt. Pennsylvania ranks third in average student loan debt at \$39,375, which just about equals the average debt of 55% of Pitt four-year graduates.

Disruption in federal loan administration and uncertainty of funding itself is a nightmare perhaps most acute at Lincoln University where 98% of students rely on federal loans.¹⁵

Debt relief and restructuring programs have been replaced by debt collectors and garnishment. Caps on borrowing create a framework for those less qualified but with larger wallets who shove aside the better qualified but of more modest means.

¹⁰ Transfers from student tuition, fees and appropriations have funded annual Athletic Department deficits totaling \$-236million 2019-2024. The 2024 loss alone summed \$-45 million. Important to note that the Resolution is prospective only - as problematic as the current practice funding Athletic Department losses may be.

See, <https://www.pa.gov/agencies/education/data-and-reporting/ps-higher-education/the-stairs-report.html>

¹¹ Reference to the financials of the University of Pittsburgh athletics is the focus of much of the analysis. That arises primarily because of the size of its enormous athletic deficits. However, the fundamental principal that student tuition, fees and taxes should never be used to pay players at any public university applies equally to all.

¹² See, <https://www.prepscholar.com/sat/s/colleges/University-of-Pittsburgh-tuition-financial-aid>
<https://ticas.org/wp-content/uploads/2021/11/Student-Debt-for-College-Graduates-in-Pennsylvania.pdf>

¹³ See, <https://files.eric.ed.gov/fulltext/ED623638.pdf>

¹⁴ See, <https://www.workrisenetwork.org/working-knowledge/impact-student-debt-low-wage-workforce#:~:text=Compared%20to%20their%20white%20and,opportunities%20for%20their%20children's%20education.>

¹⁵ See, <https://why.org/articles/pennsylvania-drexel-jefferson-university-layoffs-cuts/>

The present Resolution fully avoids making financial and indeed emotional harm to students and families worse.¹⁶ No part of the \$246MM cap to pay professional athletes at Penn State, Pitt or Temple, over the next decade, will be coming from their income or debt.

B. Taxpayers¹⁷

In November 2025 appropriations for 2025-26 were enacted.¹⁸ \$252MM was allotted to Penn State, \$158MM to Temple and \$152MM to Pitt. Neither the governor, any legislator nor any member of this Board was requested by any State Aided school to authorize \$61.5MM of their appropriations to pay professional athletes.

The 2024 Pitt athletics deficit of \$-45MM is 30% of the total allocation to the entirety of the University of Pittsburgh. Adding the \$20.5MM player pay effective July 1, 2025, the deficit rises to \$-65.5MM or 43%. It is hard to contemplate that any taxpayer, governor, legislator, or member of this Board ever remotely envisioned \$236MM of student tuition, fees and tax money would fund more than a ¼ \$billion athletic department deficits at Pitt just since 2019.

The proposed Resolution does not address the problematic practice of funding athletic department deficits from these sacred sources. The Resolution's goal is to prevent the enormous injury from getting worse by barring use of tuition, fees and taxes to pay professional athletes. Failure to adopt the resolution hurts students/families and taxpayers.

H.R. 1421, authorizing the allocations to the State-Aided schools for this fiscal year carries important restrictions and prohibitions intended to ensure the monies will be used as intended and taxpayers protected. Any school paying any part of player pay is in violation.

The law states that a State-Aided university may use appropriated funds solely for purposes allowed by this act (H.R 1421 §5(a)(1)). “Money to the University of Pittsburgh *shall only be used for costs directly related to the instruction of graduate and undergraduate [Pennsylvania] students incurred in providing student related services...*” H.R. 1421 §9(2). “The Auditor General may...*disallow expenditures made for purposes not permitted by this act, recover the*

¹⁶ The emotional hell of student debt is real, debilitating and worse. The subreddit r/StudentLoans and suicide is important. <https://www.reddit.com/r/StudentLoans/search/?q=suicide&cld=5a3b4a03-c307-4de3-9315-98c47a910284&iid=11fbc460-0ca2-412e-a98b-c8c0147950ae>

¹⁷ Beyond the identified classes receiving help from the resolution, there are others. For instance, the prohibition of using tuition and fees to be diverted to pay professional athletes likely to be hugely disproportionate to players in revenue, sports mean current athletes in non-revenue sports, will retain their scholarship tuition benefits since the monies supporting an Olympic player's participation may not be yanked to pay professionals. It is generally understood that approximately 75% of annual \$20.5MM player pay will go to football, 15% to Men's basketball and 10% to all other sports.

¹⁸ See, <https://www.pennlive.com/news/2025/11/pa-lawmakers-approve-mostly-flat-funding-for-state-subsidized-universities.html#:~:text=In%20what%20is%20often%20the,During%20former%20Gov.>

sums from the STATE-AIDED university and transmit the recovered sums to the State Treasurer.” H.R. 1421 §5(b). (Emphasis added).¹⁹

At Pitt, and presumably at all State-Aided schools, 100% of state funding is allocated to tuition discounts for in state residents.²⁰ In turn, the Stairs Reports tells us that Pitt funds its athletic department deficit from tuition, fees and the taxes subsidizing that tuition. There is no public record suggesting the taxpayer money applied to tuition is in any way segregated from the tuition monies transferred to fund Pitt’s athletics deficits. That practice is expressly prohibited by H.R. 1421 because it is not a “permitted act” under the law. Such violation empowers the state Auditor General to recover taxpayers’ monies transferred for Pitt athletics deficit funding. Taxpayer dollars used to pay players is not a permitted use and so is therefore illegal under the statute and may increase the University’s legal exposure.

C. University Staff, Employees & Researchers

This Board is well familiar with the unprecedented severe upheaval confronting Pennsylvania’s State-Aided universities. Federal research grant money for Penn State, Pitt and Temple approach \$2Billion annually. Funding cuts from the National Institutes of Health alone were projected earlier costing Pitt \$183MM annually.^{21, 22} Since February 2025 and continuing, that future revenue source is uncertain making financial planning challenging.

In response, Penn State announced budget cuts of \$103 million for FY ’26 and a hiring freeze.²³ Temple University answered its FY ’26 projected \$60 million deficit with 5% pay cuts while laying off 50.^{24, 25} The University of Pittsburgh announced a hiring freeze in March which morphed into something called “Controlled Hiring” in July although it is anecdotally reported that “silent layoffs” proceed.²⁶

Should the Resolution be defeated or not acted upon affirmatively, job losses will arise in short order are a direct and obvious consequence of the present conditions. Perhaps ironically most

¹⁹ See, <https://www.palegis.us/legislation/bills/text/PDF/2025/0/HB1421/PN2589>

²⁰ See, <https://www.utimes.pitt.edu/news/after-long-delay-pitt>

²¹ <https://www.post-gazette.com/business/healthcare-business/2025/02/08/pitt-nih-funding-cut-trump-administration/stories/202502080038>

²² “The feel on my floor at the university is very somber and uncertain,” said Nicole Hays, a research operations manager at Pitt. “Nobody really knows what’s going to happen.” <https://triblive.com/local/regional/uncertainty-swirling-for-university-researchers-impacted-by-proposed-nih-cuts/>

²³ See, <https://www.bestcolleges.com/news/penn-state-cuts-100m-budget-address-financial-challenges/>

²⁴ See, <https://www.utimes.pitt.edu/news/higher-ed-update-several>

²⁵ See, [https://www.highereddive.com/news/temple-university-to-lay-off-50-employees/753612/#:~:text=from%20your%20inbox.-,Temple%20University%20to%20lay%20off%2050%20employees,\\$30%20million%20from%20its%20deficit.](https://www.highereddive.com/news/temple-university-to-lay-off-50-employees/753612/#:~:text=from%20your%20inbox.-,Temple%20University%20to%20lay%20off%2050%20employees,$30%20million%20from%20its%20deficit.)

²⁶ See, <https://universitycommunications-marketing.cmail20.com/t/j-e-wsxt-dirtyxw-r/>

likely beginning within the athletic department themselves.²⁷ This result is inevitable where funds must be diverted from existing university payroll (current jobs) to pay professional athletes.

Unconscionable. In contrast, any funds from the sources looked to be protected through passage of the Resolution will not be diverted and so, not be added to the precariousness of existing jobs. Any funds emanating from the three protected classes carry a traceable tincture. They may not be applied to paying professional players by any route.

It is mitigation.

III.

Analysis

Without adoption of the Resolution this Board greenlights paying professional athletes \$20.5MM per institution with funds from students and their families (most of whom already in substantial loan debt), taxpayers (even though such payments appear illegal by the express command of H.R. 1421) and university staff and employees with their jobs. Failure to act affirmatively is a patent endorsement of harm to constituents.

States and universities nationally have enacted common sense guardrails as embodied in the resolutions.^{28, 29} For instance, legislation now enacted into law in Utah expressly bars any use of “tuition, fees or allocations (taxes)” identical to the Resolution before you.³⁰

It is useful to count what the Resolution carries out at once upon adoption:

- It avoids starting the Pennsylvania State-Aided Universities incurring expense up to \$738MM.
- It ensures students and their families will not be charged/surcharged in their tuition and fees, any part of up to \$20.5 million annually for ten years at their school for player pay.
- It ensures that student/family loan balances will not increase through whatever sum the university elects to pay its players.
- Tuition and fees funding university employees and researchers will not be reduced by pay being diverted to pay professional players. In the current uncertainty of research

²⁷ See, Indiana University laying off 25 in its athletic department so those “savings” can be diverted to pay professional players. <https://apnews.com/article/indiana-athletic-department-layoffs-ncaa-ca8a5602fe0b01873c606c2bd3132539>

²⁸ See, <https://www.2adays.com/blog/college-athlete-revenue-sharing-will-launch-even-if-house-v-ncaa-stalls/>

²⁹ See, Colorado University. Unprecedented \$-27MM athletics deficit *will not be funded from tuition or taxes*. <https://www.usatoday.com/story/sports/ncaaf/big12/2025/12/02/colorado-athletics-budget-deficit-deion-sanders-colorado-football-contract-nil/87560914007/>

³⁰ See, <https://le.utah.gov/~2025/bills/static/HB0479.html>

cutbacks, it may provide some solace knowing an employee's or researcher's position will not be raided to pay athletes.

- Taxpayers are generally not inclined to have their taxes used to fund intercollegiate athletics.
- Pitt Olympic athletes. Your scholarship is safe to the extent it may not be used instead to pay players predominantly in revenue sports³¹.
- Player pay I. There is no cap on NIL player pay whatsoever. This is the difference maker for on-field competitiveness.
- Player pay II. The Resolution has no negative effect on fundraising, ticket and merchandise nor licensing or naming rights sales.
- It is essential to note that the resolution is prospective only. For instance, at Pitt athletic department deficits of \$-236MM since at least 2019 (\$-45MM in 2024 alone) have been funded 100% by some combination of student tuition, fees and appropriations (taxpayer money), as problematic as that fact may be, as noted on Pitt's Stairs reports discussed at fn.2. This Resolution does not address that practice. It is geared to not making it worse.

IV.

Conclusion

For the preceding reasons it is respectfully requested the Resolution be adopted immediately. Your action will provide relief and shield students, their families, taxpayers, staff and employees via avoidance of up to \$738 million expense. Importantly, acting at the earliest provides time for those charged with raising player pay to investigate alternative funding sources.

Respectfully submitted,



J. Byron Fleck, CAS '76, AM, JD

Chancellor's Fellow & Honors Graduate

2004 Pitt Alumni Volunteer of the Year

Donor to Pitt Academics and Athletics

³¹ On April 3, 2025 the NCAA announced that scholarships to athletes would continue to be honored for in the event their sports program was cut or eliminated and would remain so for the remainder of the player's eligibility, See, <https://swimswam.com/athletes-who-are-cut-due-to-roster-limits-will-not-lose-their-scholarships/>

From: Imgrund, Lauren <limgrund@pa.gov>

Sent: Tuesday, January 20, 2026 1:35 PM

To: Amann, Carrie <camann@pa.gov>

Subject: Fw: Environmental Protection input on PA Higher Ed Strategic Plan

Good afternoon Carrie --

Secretary Shirley asked me to gather some input from our team in response to the Strategic Plan. I hope these comments are helpful. Please let us know if we can help in other ways.

· **Goal 1: Increase Postsecondary Credential Attainment**

In addition to addressing the shortage of engineers—particularly civil engineers needed to support an aging and deteriorating infrastructure—there should be a defined pathway for engineers to obtain professional certification. Other sectors, such as education, have established models for credentialing, demonstrating that such a system is both feasible and achievable.

Goal No. 2 : Ensure Affordable Pathways to Postsecondary Credentials

Page 9 identifies working with L&I and PDE to deploy Workforce Pell grants. Consider adding that these new grant opportunities must be effectively communicated to prospective students pursuing both traditional degree paths and non-degree trade programs, such as drinking water and wastewater operations certificates at community colleges

Goal No. 3 – Support the Economic Development Needs of the Commonwealth

Higher education should support the needs of those who facilitate implementation of economic development for new and expanding growth areas. DEP staff, municipalities, county conservation districts, and consultants need education and training on new and expanding industries to facilitate implementation of economic development. DEP and its partners play a key role in ensuring that the environmental impacts of economic development for new and expanding industries are in concert with environmental protection statutory and regulatory requirements. DEP, municipalities, county conservation districts, and consultants need education on these growth areas to develop and implement strategies to evolve as these areas grow and evolve. The research and talent pipeline are important for the growth of the sector, and the others involved implementation. Higher education should focus on knowledge gaps within the growth sector and to those involved in supporting that sector.

Goal No. 4 - Support the Workforce Development Needs of the Commonwealth

We are at a critical moment: the demand for engineers—especially civil engineers—is rising sharply at the same time Pennsylvania’s infrastructure is aging and in urgent need of rehabilitation. The American Society of Civil Engineers’ [2025 Infrastructure Report Card](#) underscores the scale of these challenges. Multiple agencies across the Commonwealth, including DEP, PennDOT, and DCNR, are competing for the same limited pool of engineering talent. To meet future needs, more students must be encouraged to pursue STEM pathways, beginning as early as elementary school. Pennsylvania’s student population is diverse, and it is important that they see that diversity reflected in the professionals who visit their classrooms, participate in career days, and serve on panels—particularly in underserved communities.

Professional Geologists and Professional Engineers. PGs and PEs are beneficial in mining permit review, water related complaint investigations, and reclamation project planning and design. This is not only a staffing need for our Bureaus, but also for the mine operators and consultants in the regulated community. Many of the applications and plans that are submitted for review require PG or PE certification. Larger consulting firms and mining companies around the country are recruiting geology and engineering majors while they are still in college. While Mining Engineers are highly sought after, Civil and Mechanic Engineers are also being recruited by consultants and mining companies.

Include language about communicating Labor and Industry-identified workforce needs regularly and systematically to leadership at higher education institutions to develop appropriate programming while also creating awareness among potential student applicants about openings in those sectors (particularly the environmental sector - with acute need for sewage treatment operators, etc.).

The post-secondary credential gap affects DEP and its supporting partners. DEP staff, municipalities, county conservation districts, and consultants need post-secondary credentialed workers including engineers, lawyers, scientists, biologists, environmental planners, chemists, accountants, and toxicologists just to name a few. Without these professionals, the work to ensure Pennsylvania's resources are protected will not be possible. Their work is important to ensure responsible growth and development occurs

Higher education should support the needs of critical infrastructure operation, like wastewater treatment and disposal. The wastewater treatment industry needs skilled treatment plant operators. Economic development leads to general growth and development regionally. Supporting services for that growth and development include wastewater treatment and disposal. Wastewater treatment operations need operators to operate and maintain infrastructure. There is already a deficiency of operators, so operator training and certification program could be implemented by higher education to fulfill those needs thereby providing critical workforce.

Programs should be established to strengthen connections between industry and educational institutions, making it easier for students to access internships and job-shadowing opportunities. Some schools, such as Drexel, require cooperative education placements, which have proven highly valuable in enhancing the academic experience and helping students navigate their chosen fields.

- Page 13: In aligning workforce development resources with postsecondary credentials of value, create opportunities to combine apprenticeship skills with a higher education program of study. For example, Indiana County Conservation District is piloting an agricultural conservation technician apprenticeship program. This program would likely support college graduates entering the field but is also not meant to be college-dependent in accepting participants. However, the skills transferred through this program should be communicated to higher education programs in this sector to make students ready for careers.
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- Include Environmental, Conservation and Agricultural careers in plan implementation. PA Department of Environmental Protection (DEP), PA Department of Agriculture (PDA), and the PA State Conservation Commission (SCC) have been working together on a Clean Water

Action Group on Workforce Development. The goal of this group has been to understand the workforce needed to carry out programs in the conservation and agricultural fields.

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Community College of
Allegheny County
www.ccac.edu

Community College of
Beaver County
www.ccbc.edu

Bucks County
Community College
www.bucks.edu

Butler County
Community College
www.bc3.edu

Delaware County
Community College
www.dccc.edu

Erie County Community
College
www.ec3pa.org

HACC, Central Pennsylvania's
Community College
www.hacc.edu

Lehigh Carbon
Community College
www.lccc.edu

Luzerne County
Community College
www.luzerne.edu

Montgomery County
Community College
www.mc3.edu

Northampton
Community College
www.northampton.edu

Pennsylvania Highlands
Community College
www.pennhighlands.edu

Community College
of Philadelphia
www.ccp.edu

Reading Area
Community College
www.racc.edu

Westmoreland County
Community College
www.westmoreland.edu

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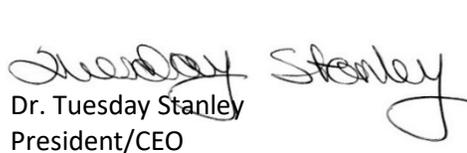
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Via email to: RA-EDSBHIGHERED@pa.gov

RE: State Board of Higher Education Draft Strategic Plan

Below please find the recommendations from the Pennsylvania Commission for Community Colleges regarding the State Board of Higher Education's Draft Strategic Plan, entitled Driving a Prosperous Pennsylvania: A Statewide Agenda for Higher Education.

- Stress the SBHE is a coordinating board with no governance oversight and power.
- The SBHE should work towards creating an environment that develops policy to enable the Commonwealth to reach its post-secondary goals; advocate and promote the importance of post-secondary education in the Commonwealth; and create an environment for post-secondary partnerships and collaboration.
- Under Goal 5: Create policy that defines the roles and responsibilities of each sector of higher education to eliminate duplication of effort, save taxpayer dollars and allow higher education to fully realize their potential under defined missions that support the Commonwealth's goals.
- Under Goal 5: Create policy that puts in place an approval process for the SBHE for new programs and new sites for all sectors of higher education. This approval process would mandate a plan be submitted to the SBHE that includes, at a minimum, a financial plan, a market study showing need for additional programs and/or locations and a public period for comment from other sectors of higher education.

Thank you for your consideration,


Dr. Tuesday Stanley
President/CEO


Dr. Nicholas Neupauer
Vice President