

**Upward Bound and Upward Bound Math and Science
Summary of Public Comments
Proposed Changes to the Annual Performance Report
Following 60-Day Review Period**

INTRODUCTION

On March 26, 2013, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the *Federal Register* inviting comments by May 29, 2013, on the proposed annual performance report (APR) for the Upward Bound (UB) and Upward Bound Math and Science (UBMS) programs. Changes to the APR were necessitated by passage of the *Higher Education Opportunity Act* (HEOA) of 2008, the amendments to the UB program regulations of October 10, 2010, and the new standardized project objectives implemented under the fiscal year (FY) 2012 competition for new grants.

At the outset of this summary, we wish to bring to the attention of the public a particularly significant change in the UB/UBMS APR as revised for the 30-day comment period. A number of commenters expressed concerns about serving students who were participating both in UB or UBMS and a dual enrollment program. For purposes of the APR (as indicated in the March 26, 2013, version of the APR), dual enrollment programs are defined as collaborative efforts between high schools and colleges that allow high school students to enroll in college-level courses and earn credit towards both a high school diploma and a college degree (college-credit enrollment) or a career preparation certificate (career dual enrollment). These programs often provide participants not only academic advantages, but financial benefits as well, since students who succeed in earning a certificate or an associate degree, or college credits, through such programs often do so at little or no expense to their families.

Some of the commenters argued that postsecondary certificates or degrees that participants earned through a dual enrollment program should count towards a project's postsecondary enrollment objective, thus potentially contributing to the project's prior experience (PE) points. These arguments did not provide any new justifications sufficient for the Department to change its position, maintained in the previous UB/UBMS and Talent Search (TS) grant cycles, as well as within the current TS grant cycle, that postsecondary degrees will count towards the enrollment objective only if earned after the student graduates from high school.

What did give the Department cause to reassess reporting on students in dual enrollment programs was the situation of participants in such programs that entail a *fifth year of high school*. This dual enrollment structure, while advantageous for many students, does not align with assumptions used in UB/UBMS APRs to date, which have been predicated upon a four-year high school experience. Two of the objectives established for the 2012 UB and UBMS competitions—those for rigorous secondary school program and postsecondary enrollment—are organized around expected high school graduation cohorts, which presuppose four years as the normal duration of high school.

The Department believes that grantees should not be put at disadvantage in earning PE points because the projects have served students who were enrolled in five-year dual enrollment

programs and thus did not complete high school within the traditional four-year timeframe. We note that, in addition to dual enrollment programs, other changes are occurring in American students' high school experiences; for example, online coursework can allow some students to complete high school in three rather than in four years.

Since under normal circumstances the APR is thoroughly reconsidered and open for comment only once every few years, the Department wants to take this opportunity to make a significant change that will respond to such influences in secondary education. **We have therefore concluded that we should no longer base any of our PE calculations on expected high school graduation cohorts that reflect a single pattern of secondary education.**

Action Taken:

Revised Objectives: The Department has revised the two objectives whose denominators were based on expected high school graduation cohorts. The new objectives follow, with the new denominators highlighted.

Rigorous secondary school program of study: X% of all **current and prior-year UB/UBMS participants who graduated from high school during the school year with a regular secondary school diploma** will complete a rigorous secondary school program of study.

Postsecondary enrollment: X% of all **current and prior-year UB/UBMS participants who graduated high school during the school year with a regular secondary school diploma** will enroll in a program of postsecondary education by the fall term immediately following high school graduation, or will have received notification by the fall term immediately following high school from an institution of higher education of acceptance but deferred enrollment until the next academic semester (e.g., spring semester).

Changes in APR Fields: The Department has also reworded a number of APR fields so as to reflect the revised objectives:

--The field that requests basic information on dual enrollment (#42 in the updated draft APR) now includes options to differentiate between participation in five-year and non-five-year dual enrollment programs.

--Grade-level fields at date of first service, start of academic year, and start of academic year following the year being reported (#26, 31, and 32) now include an option for a fifth year of high school for students in a five-year dual enrollment program.

--The fields related to the objectives on rigorous secondary school program of study and postsecondary enrollment (# 37 and 64) have been reworded to reflect the revised objectives.

In addition, the general instructions now contain a paragraph summarizing how projects should report on students in five-year dual enrollment programs; instructions for the revised fields have also been edited.

Opportunity to request changes in targets for objectives: We believe that most projects will not need to make changes in their targets as a result of our revisions in the objectives on rigorous

secondary school program of study and postsecondary enrollment. We will, however, provide a **one-time** opportunity for projects to request changes that are specifically in response to these revisions.

The Department's response to comments on other issues:

Fifty-eight respondents submitted approximately 306 individual comments (that is, some respondents provided more than one comment). In a number of cases concerning various fields, some commenters appeared not to have noticed certain important points made in the General Instructions and in Section II. Since this information will illuminate discussions later in this document, we are bringing the issues to readers' attention here.

- A number of commenters seemed to be under the impression that fields should appear in the APR only if they would provide data used specifically to calculate PE points. As indicated in the first paragraph of the General Instructions, the Department also uses APR data to assess the outcomes of grantees and of the UB and UBMS programs as a whole; a prime example is calculations for the performance measures included in the 2012 grant competition package and repeated in the "Definitions That Apply" in the General Instructions. The Department also needs data from the APR to respond to reporting requirements of the *Government Performance and Results Act* and the HEOA. Finally, the Department may need to conduct other analyses concerning these large and important programs.
- In several fields, as explained in the General Instructions, data is being gathered so as to allow TRIO to respond with greatest possible accuracy to the requirement in §1070a-18 of the HEOA that the Department prepare a performance report on the UB and UBMS programs that is to include comparative data, where available, on national performance of low-income students, first-generation students, and students with disabilities. The data from certain fields in the APR may help TRIO to identify subgroups of national datasets that may have greater validity for comparative purposes than would a broader group.
- Some commenters thought that a check mark in the far right column of Section II meant that the field needed to be updated each reporting year. Please note that Section II actually indicates that these fields must be *checked each year to see if updating is needed*.

As these points suggest, **it is in grantees' best interest to read the General Instructions thoroughly** so as to prepare an APR that will convey all data correctly. Grantees must not rely solely on Section II, and certainly not solely on the online Web application soon to be under development. Please keep the General Instructions at hand and refer to them frequently.

The remainder of this document provides a summary and analysis of the comments received, as well as information on changes to the proposed UB and UBMS APR in response to the comments. Suggestions for minor changes (generally those of a technical nature) are not discussed below, but in response to those suggestions some clarifications and technical alterations have been made in the revised form and/or instructions. **Please note that, unless otherwise stated, field numbers cited in the discussion below refer to the updated draft.**

SECTION I

Competitive Preference Priorities

Comments: Several commenters stated that it is unclear how the Department will use the information presented in Section I on the competitive preference priorities to assess the progress or successful accomplishment of each priority by the grantee.

Discussion: Each grantee that proposed plans to implement the priorities did so based on its own institutional commitments. The Department will review grantee responses to the competitive preference priorities to determine the extent to which the grantee is implementing its priorities as planned.

Action Taken: None.

SECTION II: ELIGIBILITY INFORMATION AND OTHER FIELDS RELATED TO PARTICIPANT'S INITIAL SELECTION

Number of Eligibility Fields

Comments: Under the regulations governing the UB programs prior to enactment of the HEOA, a student had to be either a potential first-generation college student or a low-income individual to be eligible to participate in the program. Under the HEOA and the new program regulations published October 26, 2010, however, these eligibility criteria were expanded to include individuals who have a high risk for academic failure. In the March 26, 2013, version of the draft APR, these criteria were organized in three separate fields, in contrast to the 2007–12 APR, in which the two criteria were in one field. Several commenters disliked this formatting change; they wanted one field that would allow them to pick any applicable criterion of the three or any combination of the criteria, as done in years past. One commenter suggested that using three fields, one for each of the program eligibility criteria, placed a data burden on grantees funded in the 2007–12 cycle that would now need to convert preexisting data; this would be particularly burdensome for projects that do not have the expertise to convert the data automatically, the commenter said.

Discussion: In the 2007–12 APR, all possible combinations of criteria were covered with three options; under the new law and regulations, seven combinations are needed. The Department originally thought that three individual fields for the eligibility criteria would be easier for grantees to deal with, and would also facilitate some of the Department's data analyses. Thanks to respondents' comments, however, the Department now recognizes the burden on many grantees that the change would entail, and notes that one field with options to cover all combinations of eligibility will meet our analytic needs.

Although a participant need only meet one of three criteria (low-income, potential first-generation college student, or at high risk for academic failure) to be eligible, the Department encourages projects to assess a participant's eligibility using all three criteria and to report accordingly. For example, if a participant is low-income and potential first-generation, and if he

or she meets at least one of the criteria for high-risk status, the project should select the new option “7” (low income, first generation, and high risk).

Because the high-risk eligibility status is new to the 2012–17 grant cycle, the Department is aware that information on high risk would not be available for participants first served prior to the 2012–13 project year; further, the Department recognizes that projects may not have collected this information on all new participants first served in the 2012–13 project year.

Beginning with the 2013–14 project year, however, a project is expected to assess a new participant’s eligibility using all three criteria and to report accordingly.

By adding these new combinations of eligibility, the Department is in no way requiring or expecting projects to serve more participants that are at high risk. The statute and regulations require that at least two-thirds of the participants an UB project serves each year be low-income individuals who are potential first-generation college students. Those individuals who have all three characteristics—that is, those who are low income, first generation, and at high risk for academic failure--would also be included in the two-thirds.

Action Taken: The criteria for program eligibility are now listed in one field. Projects will be able to select a single eligibility criterion or a combination of criteria.

Criteria for Documenting Participants’ Eligibility Status Based on High Risk for Academic Failure

Comments: Per §645.6 of the UB regulations, and as noted within the “Definitions That Apply” in the General Instructions, a participant can be considered to meet the eligibility criterion of being at high risk for academic failure if at least one of four criteria stated in the regulations applies to the student. Accordingly, the March 26, 2013, version of the APR contained fields (#17–19) in the updated draft APR covering these criteria. Many commenters inquired about the purpose and importance of gathering information on participants’ high-risk status; some argued that responding to these fields places a data-collection burden on grantees. Several commenters explained that there was no warning that this information would be collected; therefore they had not collected the data as they selected participants for the project.

Discussion: The criteria established in the regulations to determine high-risk status are basic in that they deal with level of grade point averages, proficiency in major academic areas, and exposure to algebra. The Department believes that information on these criteria may be important to our understanding of the nature and extent of the needs of UB participants at high risk for academic failure. The data may also be valuable for various analyses of the UB program and for establishing subgroups of national datasets for comparison with UB and UBMS participants in the performance report required by the HEOA (see discussion in the introduction to this response to public comments).

For any project with participants whose eligibility in the 2012–13 APR is based on high risk status, the Department disagrees with the argument that these fields represent a burden, given that the project would have had to collect the data in order to ascertain and document the participant’s eligibility. We also point out that the criteria for this status were stated in the

program regulations, which were open for public comment and included in the 2012 grant application package.

As explained in the entry on the number of eligibility fields (above), as of the 2013–14 project year the Department expects projects to assess all new participants’ eligibility based on all three criteria; this will include determining the student’s proficiency level, GPA at initial selection, and past coursework in algebra or pre-algebra, so as to be able to respond to fields #17–19 without extensive use of the “Unknown” option. In 2012–13, of course, for any student coded in eligibility field #16 as 3 (high risk), 5 (low income and high risk), 6 (first generation and high risk), or 7 (met all three criteria), the project must indicate that the student was at high risk in at least one of fields #17, 18, or 19.

Action Taken: We have revised fields #17–19 to indicate that, beginning in project year 2013–14, projects should report high-risk status of all new participants.

Academic Need

Comments: Several commenters indicated that there are not enough options to classify adequately the academic need of participants, since many options previously available in the 2007–12 APR were dropped in the March 26, 2013 draft APR. These respondents pointed out that they would be unable to demonstrate certain participants’ need for the program, as required in the UB regulations, without being able to point to one of these options.

Discussion: The Department had removed those options in an effort to reduce grantees’ burden, but, thanks to respondents’ comments, recognizes the problem this action caused.

Action Taken: The Department has added field #23, Other Academic Need, to restore the options previously available. Field #23 includes an option allowing projects to indicate that a participant’s need was identified in one or more of the fields for evidence of high risk status (#17–19).

Participants’ Education Expectations and Diagnosed Learning Disabilities

Comments: Many commenters objected to two new fields, Education Expectations and Diagnosed Learning Disability (#23 and 24 in the March 26, 2013, draft APR). In the case of the former, commenters said that UB and UBMS participants—particularly the youngest ones—are not familiar enough with postsecondary education to answer with good understanding the question posed by the field. Regarding the second field, commenters wrote that target schools do not routinely provide information on learning disabilities and that some schools will provide a response only with parental consent.

Discussion: As noted in the General Instructions, the Department included these fields in the draft APR so as to help establish subgroups of national datasets for comparison with UB and UBMS participants in the performance report required by the HEOA (see discussion in the introduction to this response to public comments). The education expectations field, which is similar to a survey question in the Education Longitudinal Study of the National Center for

Education Statistics, was intended to gather information on students' perceptions of postsecondary education. As a result of the commenters' remarks, however, the Department recognizes the difficulties that these fields would pose to UB and UBMS projects; moreover, we have ascertained that eliminating the fields would not compromise the analysis planned for the HEOA-mandated performance report. The Department has thus concluded that the drawbacks of retaining the fields outweigh the benefits that might be provided for the HEOA performance report.

Action Taken: The Department has eliminated these two fields from the APR. We have, however, added a field (Disability Status [at time of initial selection], #21) asking whether a participant has a disability, as that term is defined in section 12102 of the *Americans with Disabilities Act* (42 U.S.C. 12101 *et seq.*). This field will allow the Department, in responding to the performance report requirement of the HEOA, to include nationwide comparisons including students with disabilities.

Disconnected Youth

Comments: Regarding the Disconnected Youth field (#22), a number of commenters wrote that the definition is unclear and that gathering this information would impose a burden on projects. Many commenters stated that including this specific field does not address required UB eligibility criteria, has no direct connection to receiving PE points, and is only one of many permissible services under the new program regulations; therefore, they argued, it should be deleted.

Discussion: Disconnected youth, as defined in the President's FY 13 Budget under its General Provisions, Sec. 737, are young people, 14 to 24, who are homeless, in foster care, involved in the juvenile justice system, or who are not employed or enrolled in an education institution. As noted in the introduction to this summary of comments and in the General Instructions, the APR collects data for a number of reasons, and is not strictly limited to the purposes cited by the commenters. In the case of disconnected youth, the obvious and critical needs of these individuals and the benefits they could potentially gain from UB and UBMS led the Department to move to identify them within projects' databases. The Department notes moreover that the White House Council for Community Solutions led an initiative on disconnected youth in 2012 resulting in a report, and that the Department provides leadership in the federal government's Interagency Forum on Disconnected Youth. We do not consider this field to be particularly burdensome, given that projects should generally become aware of their potential participants' needs in the course of intake. We acknowledge that the field in the March 26, 2013, draft APR needs clarification.

Action Taken: The disconnected youth field has been restructured and the definition provided.

SECTION II: FIELDS CONCERNING PARTICIPATION IN UB OR UBMS AND STATUS IN SECONDARY SCHOOL

Deceased Participants

Comments: Two commenters wanted to know whether deceased participants would be included in calculations for prior experience points; another commenter requested that, out of consideration for project staff members' grief, the Department remove such participants' records from future APR files.

Discussion: The Department is providing a new field (#27) so as to be able to differentiate in PE calculations between prior-year and current participants who are deceased or incapacitated. Since the field defines the current participants as those who were served during the project year, but who are now deceased or permanently incapacitated, the Department will of course include these individuals in determining whether the grantee served no fewer than the approved number of participants. The Department will, however, exclude this group from the numerator and denominator in all other PE calculations.

While the Department has strong sympathy for the grief of project members who have experienced the death of a cherished student, we decline to remove deceased participants' records from future APR files because of the possibility of introducing errors in the grantee's data file that might adversely affect a grantee's objectives. It is the responsibility of the grantee to maintain on the APR the record of each participant served for the required period of time and to accurately report the status of each participant; the Department will not assume responsibility for altering the grantee's data file.

Action Taken: None.

Participants Served by Another Federally Funded College Access Program

Comments: Numerous commenters recommended deleting field #30, which requires information on UB/UBMS participants served by other federally funded college access programs. The commenters argued that requiring UB/UBMS projects to collect this data places an undue burden on projects, since students "forget" or do not disclose their participation in other programs or do not always know if the programs are federally funded or not. Other commenters noted that the field lacks an option in which to report participants who are not served by a federally funded college access program other than UB or UBMS, and that the instructions do not provide guidance on reporting on such participants.

Discussion: The Department established the field for reporting on participants served by other federally funded college access programs in response to requirements in the HEOA and the UB regulations for coordination and collaboration among programs designed to assist disadvantaged students. While we acknowledge that reporting on students' participation in other programs may sometimes be challenging, we think the purpose of the requirement—to minimize duplication of services so that more students can be served—is unexceptionable. We note also that the regulations requiring this collaboration (in 645.21 and 645.43) have been available since before

the 2012 competition, and therefore should not come as a surprise to any grantee. Moreover, the application instructions for the UB and UBMS grant competitions advised that applicants should ascertain need for the project in part by becoming aware of other projects in the target area that are serving the same population. The Department acknowledges, however, that the field needs an additional option.

Action Taken: The Department has added an option for current participants served by only one federally funded college access program (i.e., UB or UBMS).

Grade Point Averages

Comments: One commenter requested guidance on calculating both weighted and unweighted GPAs (fields #33 and 34), while others thought that providing both weighted and unweighted GPAs would be burdensome.

Discussion: The Department will refrain from providing guidance, since there are several GPA scales and the conversion procedures likely vary. Guidance should be sought from target schools or the local school district on the best method of GPA conversion.

In regard to the perceived burden of providing information on both weighted and unweighted GPAs, the supplementary information in the final regulations for the TRIO programs, published October 26, 2010, and available at <http://www2.ed.gov/legislation/FedRegister/finrule/2010-4/102610a.html>, included discussion of public comments on weighted GPAs (pages 65741 and 65743). In response to those comments, the Department stated that cumulative GPAs for PE calculations should be calculated on all courses taken based on a four-point scale, and that GPA could be weighted for students completing honors or AP courses. Field #33 is thus consistent with that public statement.

As indicated in the General Instructions, the Department needs unweighted GPAs for comparative purposes related to the performance report required by the HEOA and discussed in the introduction to this document.

Action Taken: None.

Graduation Following Home or Virtual Schooling

Comments: One commenter requested an option in the High School Graduation Status field (#35) for reporting on students who graduate during the reporting year and complete secondary studies via home schooling or virtual schools.

Discussion: Specific reporting options are not provided for home schooling or virtual schools, because the intent for this field is to capture secondary school completion data. Projects should report the participant's status based on how the district or state classifies the student. If the state allows such students to receive a regular secondary school diploma (according to the Department's definition in "Definitions That Apply" in the General Instructions), and if the student meets the state's criteria for doing so, then the project may select option 3 (Received regular secondary school diploma).

Action Taken: None.

Rigorous Secondary School Program of Study Completed

Comments: Many commenters expressed concern about reporting on the completion of a rigorous secondary school program of study (#37) for prior-year participants.

Discussion: In § 645.32 of the Upward Bound program regulations and within the Project Profile Summary sheet included in the FY 2012 grant application package, the Department outlined how PE points would be awarded for all objectives and which participants should be included. More specifically, the Department noted that both prior-year and current participants who at the time of entrance into the project had an expected high school graduation date in the school year would constitute the denominator for the fourth standardized objective measuring the completion of rigorous secondary school programs of study. However, as explained in the introduction to this document, the Department has determined that the standardized objectives should not be based on an expected high school graduation cohort. Therefore, this objective has been revised; the denominator now includes all current and prior-year UB/UBMS participants who graduated from high school during the school year (2012–13) with a regular secondary school diploma. The Department is not asking in this field for data on *all* prior-year participants, but only on those specified. If a project is unable to obtain information on a particular prior-year participant, the project should choose option 0, Unknown.

Action Taken: None in specific response to these commenters; Section II and the General Instructions have been revised to reflect the revisions made in the objectives as described in the introduction to this document.

Advanced Placement (AP) or International Baccalaureate (IB) Course Completed

Comments: Several commenters suggested adding an option in this field (#41) for students enrolled in schools that do not offer AP or IB courses; other commenters requested clarification on how to report on prior-year participants in this field. Two commenters asked whether the field was intended to collect information solely on the period on which projects were reporting, or rather on a broader timeframe.

Discussion: As noted in the General Instructions, the Department will use data in this field to help establish subgroups of national datasets for comparison with UB and UBMS participants in preparing the performance report on TRIO programs required by the HEOA (see discussion at the outset of this summary of public comments). Based on commenters' remarks, we have concluded that adding an option for students enrolled at schools that do not offer AP or IB coursework will help grantees to respond to the field and will thus improve the quality of the data.

We agree that the APR should make clear that, for purposes of the HEOA comparative analyses, the Department wants to know whether the student ever completed an AP or IB course *in high school*—not just whether such a course was completed during the project year. The field already indicates that, for prior-year participants, if information is not readily available, grantees should select 0, “Unknown”; we do not see the need for further elaboration.

Action Taken: The Department has added an option to this field covering students enrolled at schools that offer neither AP nor IB coursework. We have also clarified the field to indicate the timeframe covered by the question.

Dual Enrollment Participation

Comments: The introduction to this document discusses two issues that commenters raised concerning participants served both by UB/UBMS and dual enrollment programs: whether certificates and associate degrees earned during a dual enrollment program will count towards the postsecondary enrollment and completion objectives, and how the Department might respond to UB projects with participants in five-year dual enrollment programs. Several commenters asked as well about definitional issues. More than one respondent stated that it is unclear whether any/all dual enrollment is included in the definition or only those dual enrollment programs that would lead to the student completing a degree or certificate by the time the student completes high school. Other comments suggested the field be renamed “Students Enrolled in College Level Coursework in the Reporting Year” because not all students taking college courses are in a dual enrollment program.

Discussion: As noted in the Introduction, the Department defines dual enrollment programs as collaborative efforts between high schools and colleges that allow high school students to enroll in college-level courses and earn credit towards both a high school diploma and a college degree (college-credit dual enrollment) or a career preparation certificate (career dual enrollment). This definition is not limited to programs that lead to students’ completing a degree or certificate by the time of high school graduation; it also includes those that can provide credit towards a later degree or certificate. Projects should report on students who participated in such programs during project year 2012–13, regardless of whether they actually earned college credit. (If, on the other hand, a student takes one or more postsecondary courses on his or her own, outside of a program established between high schools and a postsecondary institution, the grantee should not report the student as participating in a dual enrollment program.)

Action Taken: The Department has added in the General Instructions (field #42) further clarification of the definition of a dual enrollment program. A new field, Pre-diploma Credentials or Coursework Completed (#43), offers an option to indicate that a participant not enrolled in a dual enrollment program has completed at least one course undertaken for postsecondary credit; the field also contains options to help the Department gain a better understanding of the extent to which UB and UBMS participants enrolled in dual enrollment programs are completing postsecondary credentials.

Free Application for Federal Student Aid (FAFSA)

Comments: Regarding field #45, several commenters sought clarity on which year FAFSA completion information should be submitted; they thought that obtaining this data for any period other than senior year would be burdensome and impractical. Additionally, one commenter recommended elimination of the field since the Department already has the information available which would ease the data burden on grantees.

Discussion: While the Department has databases to help determine whether participants have completed the FAFSA, we are requesting this information in the APR to have more complete data in cases in which students' identifying information does not match unambiguously with those databases. We agree that the timeframe of the field should be limited so that grantees would be asked to report exclusively on participants, current or prior, who graduated in the reporting year.

Action Taken: The Department has revised field #45 to reflect the timeframe noted in the discussion.

Date of Last Project Service

Comments: Noting that this field (#46) indicates that a date of last service must not change in a later reporting year, one commenter argued that the field does not provide a means to report on reentry participants. The commenter also disagreed with the statement in the General Instructions that, for those students who stay in a program until high school graduation, the date of last service should be either the high school graduation date or, for those participants in the summer bridge component, the end of the summer program; the commenter pointed out that many projects work intensively over the summer with participants who have graduated to assist them with enrollment, housing, and other such issues that such students must navigate before becoming the first in the family to attend college.

Discussion: The Department agrees that the field should be modified to make clear that the date of last service may be revised for reentry participants. The Department also agrees that using a student's high school graduation as date of last service for participants served through graduation need not be an invariable practice.

Action Taken: The field now directs the grantee to the General Instructions for guidance on reporting reentry participants; the instructions have been revised to indicate that, for these participants, the date of last project service should be changed to 99/99/9999 ("Not applicable, participant is still in the program") if the individual has not completed the program, or to a new last service date if the student again left or completed UB or UBMS. The Department has deleted the paragraph in the instructions concerning participants who stay in the program until high school graduation.

Work Study Position and Employment

Comment: Several commenters wrote that the Department had not provided adequate rationale for collecting data on employment status (field #49). Noting that employment in this context is defined as "jobs sometimes arranged by the project to allow students to earn some income while participating in the program," one respondent suggested that, if the field were kept, it should exclude employment that the student secured without help from the UB/UBMS project since such employment would not constitute a project activity.

Discussion: Of the academic instruction and services required or permitted by the authorizing statute and implementing regulations, the APR has in the past requested data on five areas of

special interest to the Department; two of these were work study (internships and/or employment provided or arranged for by the project to expose participants to careers requiring a postsecondary degree; field #48) and employment, as defined above. Work study stipends were authorized as part of the 1998 amendments to the *Higher Education Act* to help students who otherwise might not have been able to participate in the summer program because of their need to work. The Department considers data from these two fields valuable because they are our only source of information on the extent to which projects provide participants with these opportunities, which were intended to decrease attrition among participants in the summer. We agree, however, that distinction should be drawn between employment arranged by the project and employment that the student secured without such assistance.

Action Taken: We have revised the Employment field to allow grantees to indicate whether the project was involved in arranging for a participant's job.

SECTION II: INFORMATION ON POSTSECONDARY EDUCATION

Objectives for Postsecondary Enrollment and Completion

Comments: The postsecondary enrollment objective (field #64, revised as indicated in the introduction to this document) is the percentage of current and prior-year participants who graduate from high school during the school year with a regular secondary school diploma and subsequently enroll in a program of postsecondary education by the fall term immediately following high school graduation, or who received notification by the fall term immediately following high school from an institution of higher education of acceptance but deferred enrollment until the next academic semester. The participants who contribute to the project's success in meeting the postsecondary enrollment objective form the postsecondary education enrollment cohort (field #55), which functions as the denominator for the postsecondary completion objective; participants in the postsecondary education enrollment cohort/completion denominator who go on to earn an associate or bachelor's degree within six years of high school graduation contribute to the project's success in meeting the completion objective.

We received a number of comments about the method of calculating the enrollment objective and about the way in which the postsecondary enrollment cohort/completion denominator was conceived; since the calculations for the two objectives are interrelated, we will cover both together. A number of commenters disputed the fairness of setting the enrollment timeframe in the fall following high school graduation (or within the next term, if the institution deferred the student's enrollment), given that some students cannot attempt to meet the schedule due to religious or military obligations. While these students might not meet that timeframe, commenters argued, the students could succeed in enrolling later and completing a postsecondary degree; the project could be recognized for that success, commenters stated, if the timeframe were expanded. Other respondents argued for establishing the postsecondary enrollment cohort based solely on high school graduation in the reporting year.

Discussion: The Department points out that, as part of the 2012 UB and UBMS grant application packages, all objectives were available for public comment prior to final release of

the packages. During those comment periods, respondents wrote on the method of establishing the postsecondary enrollment cohort/completion denominator; we provided this response:

To provide for a valid measure of postsecondary success, it is important that the objective identify the group of students to be tracked and the timeframe for measuring which of those students completed a postsecondary degree. For this proposed objective, the group of students is those students who graduated from high school in a given year **and** enrolled in postsecondary education by the fall term immediately following high school or the spring term if enrollment is deferred by the institution. The period of measurement is six years. Although some students may defer enrollment and subsequently graduate, they would not be counted in determining if the project met this PE objective. However, the project would be able to report on this participant's success in the annual performance report (APR).

The parameters for assessing PE points must be very specific so that an applicant can use this information to establish its targets for each of the standardized objectives. Since many potential applicants may have begun preparing their applications, we believe changing the objective, at this time, would confuse potential applicants.

Having considered the objections, the Department conducted the competitions with the objective unchanged. Since TRIO's grant application packages made clear which participants would be included in the denominator and numerator of all of the objectives, applicants had the information from the Department that they needed to set ambitious yet attainable targets for their projects. Projects that planned to serve populations of students who were unlikely to enroll in postsecondary education in the fall after graduation would have been able to set their targets accordingly, and to explain in their applications why their targets might be lower than those of some other institutions, yet were still ambitious.

Given that the postsecondary enrollment and completion objectives were clearly established in the application packages after an opportunity for public comment, and given that the competition proceeded on that basis, the Department declines to reopen the issue.

Action Taken: None.

School Code for Postsecondary Institution First Attended

Comments: Numerous commenters noted that, while the name of this field (#56) suggested a one-time entry, the field had a check mark to indicate need for an annual review to determine if updating was necessary. In addition, some respondents wanted to know why this field does not allow for the possibility that a student might begin his or her postsecondary education at one institution, but at a later date move or transfer to another institution.

Discussion: The Department indicated that this field needs to be checked for annual updates because a participant would generally first be coded "Not yet completed high school," with an update needed in a later year. For the Department's analytic purposes, we do indeed need data

only on the first institution attended. We do not want to place additional burden on grantees by asking for the school code of every postsecondary institution attended by the participant.

Action Taken: None.

Reporting on Postsecondary Remediation

Comments: Many commenters expressed concern about their ability to provide the requested information on remedial courses (field #65), since it might not be readily available to project staff. Commenters noted that projects have no direct access to students' college records and that no state, local, or national database provides data on remediation at the postsecondary level; they argued, moreover, that gathering data directly from prior-year participants would be time-consuming, cumbersome, and not necessarily accurate. Respondents also wrote that attempting to collect the students' transcripts would be difficult for several reasons (e.g., project staff would have to work with registrars at multiple colleges, the student would have to sign releases to permit the projects to request the transcripts, and the remedial nature of courses would not necessarily be evident from transcripts). Several commenters also stated that requesting information on postsecondary remediation would place a negative label on the participants, many of whom have already overcome numerous socioeconomic challenges to be the first in their family to enroll in a program of postsecondary education. Finally, several commenters asked whether they were to report on remedial coursework for participants enrolled in postsecondary education prior to 2013.

Discussion: The field on postsecondary remediation reflects one of the performance measures established for UB and UBMS and included in the grant application package. The Department developed these measures to track the progress of UB projects in achieving program success; the specific measure on remedial course enrollment may help the Department assess the extent to which UB projects are able to prepare students adequately for success at the postsecondary level. The Department acknowledges that some projects may encounter difficulty in acquiring information on participants' remedial coursework; we note, however, that the timeframe is limited, encompassing only the first fall semester of postsecondary education, and we hope that the brevity of the period will help projects as they complete the task. We also hope that projects' normal follow-up contacts with prior-year participants will serve as opportunities to inquire about remedial coursework. Information on remediation that the project gains through such personal contacts is acceptable documentation for TRIO's purposes, as long as the project considers it reliable.

We do not understand the comment that a project staff member's request for this information would negatively label the prior-year participant. We assume that prior-year participants who have a longstanding relationship with TRIO staff members would not think that such a query by the staff member is an attempt to label them, particularly since the information will be kept confidential.

For reporting year 2012–13 (as an example), the postsecondary remediation field requests information only on participants in the 2013 postsecondary education enrollment cohort (i.e.,

current or prior-year participants who graduated from high school in academic year 2012–13 and enrolled in postsecondary education by the fall term immediately following high school graduation or by the next term if enrollment has been deferred).

Action Taken: None.

Calculating Postsecondary Completion Objective: Timeframe

Comments: Several commenters objected that the six-year period used in demonstrating postsecondary completion (field #66) puts projects first funded in 2012–13 at a disadvantage, since they will not be able to earn PE points for this objective during the 2012–17 grant cycle. A few other respondents, noting that the postsecondary completion objective was established for the current grant cycle, questioned whether the objective should be applied to cohorts of participants served by projects during the 2007–12 cycle (i.e., in cohorts 2008–12). One respondent, citing recent budget reductions and lower cost per participant in the 2012–17 cycle, expressed concern about the fairness of measuring completion outcomes for participants in cohorts prior to the new cycle.

Discussion: The Department points out that, as part of the 2012 UB grant application package, all objectives were available for public comment prior to final release of the package. At that time, some commenters raised the issue that new grantees would not be able to earn PE points during the 2012–17 period for postsecondary completion under the standardized objective for postsecondary completion. Our response then and now is that a period of measurement obviously needed to be established for the calculation; six years was chosen because many students take more than four years to complete a bachelor's degree. Moreover, a period of six years has been used in many statistical studies of postsecondary completion.

Regarding projects funded in the 2007–12 cycle, the Department notes that the first pages of the General Instructions to APRs throughout the cycle notified grantees that the HEOA's outcome measure on postsecondary completion would apply in the 2012–17 cycle, and that therefore projects needed to keep on their data files indefinitely every participant with an expected high school graduation cohort year of 2007–08 or later. Grantees were aware, in setting their targets for the completion objective in the 2012 competition, that the objective would be applied to students served in the 2007–12 period. That the Department established the recordkeeping requirement for the 2007–12 cycle now makes it possible for us to calculate PE points for the postsecondary completion objective as early as 2013–14 for grantees funded in the 2007–12 cycle.

In regard to concerns about lower cost per participant, the Department points out that students in the 2007–12 cohorts began postsecondary education no later than the beginning of the new grant cycle; thus they are prior-year participants, and the maximum cost per participant established for serving students in the 2012–17 cycle is irrelevant.

Action Taken: None.

Calculating Postsecondary Completion: Associate v. Bachelor's Degrees

Comments: Several commenters argued that, since the postsecondary completion objective uses a six-year period regardless of whether the degree attained is an associate or bachelor's, projects with a high percentage of prior-year participants earning associate degrees may be at a competitive advantage in earning PE points.

Discussion: In the interest of transparency, the Department endeavored to establish PE calculations for each objective that would not be overcomplicated; therefore, we set one period for completing either associate or bachelor's degrees. Further, it is probable that those projects with a high percentage of prior-year participants earning associate degrees may have set higher targets for postsecondary completion in establishing objectives that were both ambitious and attainable. Given that the postsecondary completion objective was clearly established in the application package after an opportunity for public comment, and given that the competition proceeded on that basis, the Department declines to reopen the issue.

Action Taken: None.

Reporting on STEM Degrees

Comments: Several commenters raised concerns about obtaining data on degree types for participants because the information is not readily available. In addition, commenters sought clarification on which degrees should be classified as STEM degrees: one respondent noted that a recent report from the U.S. Congress's Joint Economic Committee cited different definitions of STEM used at various federal departments, while other commenters asked whether degrees in such fields as nursing and accounting should be considered STEM degrees.

Discussion: The Department considers degree types earned by UBMS prior participants to be important and basic information, given the program's mission to prepare students for postsecondary programs that lead to careers in the fields of math and science. Thus, while we acknowledge that some projects may encounter difficulty obtaining information on prior-year participants' degree types, we think the effort is justified. The Department finds acceptable any reliable source of documentation, such as a transcript, a report from the National Student Clearinghouse, or information from the prior-year participant himself. In regard to the STEM fields of study, for the purpose of responding to field #67, the Department considers the following fields of study to be STEM fields:

- Computer and Information Sciences
- Engineering
- Life Sciences, which includes agricultural sciences/natural resources, biological/biomedical sciences, and health sciences.
- Mathematics
- Physical Sciences, which includes astronomy, atmospheric science and meteorology, chemistry, geological and earth sciences, ocean/marine sciences, and physics

For UBMS, the Department will also gather data on degrees earned in psychology and social sciences. For a list of majors under each of these fields of study, please refer to pages 6 and 7 of the survey instrument for the National Science Foundation's Survey of Earned Doctorates (SED) for 2012–13 at:

http://www.norc.org/PDFs/SED-Findings/SED12-13_fill.pdf

Action Taken: The Department has added the STEM fields of study to the General Instructions and has revised field #67.

GENERAL ISSUES

Transferring data from old fields to new

Comments: One commenter wanted to know whether grantees funded in the 2007–12 cycle would be required to transfer data from their old database to the new database, whose fields differ in many respects.

Discussion: The Department has not yet made any final decisions on all aspects of this issue, but is able to say at this point that, where data from the previous APR must be entered in a new field with substantially revised options (for example, in the three fields for dates of postsecondary degrees), the grantee will be responsible for the crosswalk.

Action Taken: None at this time.

Maintaining Records for Prior-Year Participants

Comment: One commenter expressed concern about maintaining records for prior-year participants from the 2007–2012 cycle and into the future; he believed that this would constitute an ever-increasing burden that would be particularly difficult to deal with in light of sequestration. He suggested that the Department consider creating a means for projects to coordinate their data-gathering with that of other programs serving similar populations in postsecondary institutions.

Discussion: In the 2007–12 cycle, the Department knew that the HEOA would require some changes in recordkeeping in light of the postsecondary completion objective, but did not know the changes' exact parameters; therefore the General Instructions for those years required grantees to maintain participant data indefinitely, starting with participants in the 2008 expected high school graduation cohort. Now that the postsecondary completion objective has been established, we are able to reduce the recordkeeping requirements somewhat.

The Department welcomes suggestions for improvements in gathering, analyzing, and sharing data. We point to availability in this cycle of annual PE reports (beginning with the 2013–14 APR in UB and UBMS) as an example of advancement in our handling of data. We are not at this time in a position to undertake the sort of coordination that we believe the commenter had in mind.

Action Taken: We have revised the General Instructions (pages 1–2) to require that participants’ records be maintained and updated through six years after enrollment in postsecondary education or, for prior-year participants who show no sign of enrolling in postsecondary education, through six years after high school graduation. After these six-year periods, the project may drop the students’ files.

Option “No longer used” in certain fields

Comments: Several commenters requested clarification on why “No longer used” appeared as one of the options for response in two fields (#28, Participant Status and #47, Reason for Leaving Project).

Discussion: These two fields were among the many used in the 2007–12 APRs and retained for the new cycle. Over the course of the 2007–2012 grant cycle, when one of the options for each of the two fields became obsolete, the Department chose to label the options “No longer used” rather than change the numbering scheme, which might have resulted in error by grantees that have used the field over many years. Also, changing the numbers would have resulted in additional data entry and proofing for grantees. Leaving “No longer used” helps to increase accuracy and reduce the data burden.

Action Taken: None.

Additional Technical Issues

Comments: Several commenters suggested that what they perceived as redundancy be eliminated from certain fields of the APR. Another respondent thought that the six fields for attainment and date of postsecondary credentials (fields #58–63) be condensed into two fields.

Discussion: The Department has reviewed the fields cited by commenters as redundant and has confirmed that the fields are indeed needed, as stated, to assess performance or for other analytic purposes. Regarding fields #58–63, we note that the performance measures include two timeframes for postsecondary completion, the first assessing graduation within four years for a bachelor’s degree and two years for an associate degree, and the second measuring graduation within six years (please see “Definitions That Apply” in the General Instructions for the specific wording of these measures). The six fields are needed to allow us to carry out those calculations. These fields also allow the Department to determine to what extent prior-year participants have earned multiple credentials (for example, a certificate and an associate degree).

Action Taken: None.