

**Ronald E. McNair Postbaccalaureate Achievement (McNair) Program  
Summary of Public Comments on  
Proposed Changes to the 2012-13 McNair Annual Performance Report (APR)  
Following 60-Day Review Period**

On March 22, 2013, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by May 21, 2013, on the proposed annual performance report (APR) for the Ronald E. McNair Postbaccalaureate Achievement (McNair) Program. Thirty-three (33) commenters submitted approximately 250 individual comments (i.e., multiple comments from individual commenters). Many of the commenters expressed some concerns about the amount of data requested and the “undue” burden this places on McNair grantees. The Department reviewed each of the comments and concerns and has made a number of changes to the APR to reduce burden and clarify the reporting requirements.

A summary and discussion of the comments on the proposed McNair APR as well as information on the actions taken follows. Some minor changes to the APR that are of a technical nature (e.g., re-numbering/re-ordering of the data fields) are not discussed below but have been made to the revised form and instructions.

Some of the comments received did not directly relate to suggestions for revisions to the APR, but rather were related to the FY 2012 McNair competition and funding allocations for the McNair Program. This notice of proposed information collection is solely about the APR; therefore, these ancillary issues are not addressed.

*General Comments on the new reporting requirements*

**Reporting requirements related to creating a “single-year” file**

**Comments:** Several commenters stated that they concur with the new one-time reporting requirement that projects verify the baccalaureate degree cohort year for all prior-year participants who earned a bachelor’s degree between 2002-03 and 2011-12. The commenters stressed the importance of being able to reinstate participant records that had been dropped from the APR data file in previous years because the participant attained a doctorate degree prior to the ten-year time frame or the project had lost contact with the participant for a period of five years or more.

One commenter stated that the APR instructs projects to track the academic progress of all prior-year participants until they attain a doctoral degree or until they are inactive for a period of five years or more.

**Discussion:** Through the one-time verification process, the Department will require all current McNair projects funded prior to FY 2012 include on their 2012-13 APR data file a record for each McNair participant who the project reported earned a baccalaureate degree between 2002-03 and 2011-12. In addition, for each of these participants who attained the bachelor’s degree during those reporting years, the McNair projects will be required to verify, via the McNair

Student Record Verification Process (Tier 1A), the student identifier information—name, date of birth, and social security number (if applicable). This process will ensure that the APR data files submitted for 2012-13 and beyond contain all of the participant records the Department will need to calculate the prior experience (PE) points for the doctoral degree attainment objective for 2012-13 and subsequent reporting years. The projects will have the opportunity to restore participant records that had been dropped from the APR data file, eliminate duplicate entries, and correct any error in the student identifying information.

With regard to the commenter's statement regarding the reporting requirements for prior-year participants, the APR guidance cited is from the instructions for the current APR form, not the instructions for the new, proposed APR. On page 6 of the instruction for the new APR, under "New Reporting Requirements", it states: "*projects must retain participant records for a period of ten (10) years after the attainment of a bachelor's degree.*"

**Action Taken:** None

### **Doctoral degree completion timeframe**

**Comments:** A few commenters contended that the ten-year time frame for completing a research-based doctorate is a somewhat arbitrary, and often an unrealistic, completion deadline. Another commenter noted that there is no mechanism for reporting doctorates earned after the ten-year window.

**Discussion:** The ten-year time frame for doctoral degree completion is the point of measurement established in the standard objective used to award PE points. This is the same time frame used for the doctoral degree attainment objective for both the 2007-12 and 2012-2017 grant cycles. This standard objective was part of the FY 2007 and 2012 application packages and the public was invited to provide comments. The Department received 95 comments on the FY 2012 McNair application package; none of the commenters expressed concern about the ten-year time frame. The Department acknowledges that some McNair participants may take longer than ten years to complete the doctorate. Nonetheless, the Department believes ten years is a reasonable measurement point for the purpose of awarding PE points.

The Department acknowledges the value in tracking McNair scholars past the ten-year point for doctorate degree attainment. Because the point of measurement for the doctoral degree attainment objective is ten year after receiving the bachelor's degree, the Department does not have the authority to require a project to track participants for a longer period of time. However, nothing precludes a project from retaining on the APR the participant records and reporting degree completion past the ten-year time frame.

**Action Taken:** None

## **New data fields and reporting burden**

**Comments:** One commenter stated that all new data fields should only apply to new scholars and not be retroactive to previous cohorts because previous cohorts did not sign contracts permitting projects to gather the data for the new fields. Other commenters expressed concern that the collection of the requested data for some of the new fields was unduly burdensome and would yield unreliable information. Another commenter stated that, in general, many of the proposed new fields add to the reporting burden by asking project staff to do more with less when budgetary cuts are now underway due to sequestration. The commenter further stated that there should be a clear purpose for any new requirements for data collection and reporting and that new requirements be aligned with and related to programmatic objectives.

**Discussion:** While the Department acknowledges that the additional information being collected may pose additional burden, the Department is required by statute to calculate PE points based on the prescribed outcome measures and to conduct comparative analysis on program outcomes.

Therefore, the Department has added several new fields to the APR to collect information on certain past and present project participants required to calculate PE points and to collect data that would allow the Department to identify a comparison group for the mandated reports to Congress (see sections 402A and 402H of Higher Education Act of 1965, as amended by the Higher Education Opportunity Act of 2008). The Department carefully considered each of the comments received. In response to these comments, and to reduce reporting burden, the Department has dropped some of the proposed new data fields from the new APR and has revised or clarified the reporting requirements for the other new data fields.

The Department acknowledges the commenters' concerns regarding the burden in collecting some of the information; nonetheless, these data are key indicators of program outcomes and success. Thus, we strongly encourage projects to provide as much information on project participants as possible as failure to provide information may impact a project's PE points and limit the Department's ability to identify a comparison group.

**Action Taken:** To address the burden concerns, the Department has revised the APR and developed a new instruction booklet that the Department believes provides clarity by outlining the Who, What, When, Where, Why, and How of the APR process. The Department believes these revisions provide clarity for the data collection and ease in completing the APR.

## **SECTION I, PART 1 – PROJECT IDENTIFICATION/CHARACTERISTICS CERTIFICATION AND WARNING STATEMENTS**

### **C. Project Characteristics - Fields 9a and 9b.**

**Comments:** Over 40 percent of the commenters stated that field 9a in Section I, Part 1 which collects information on whether or not the project received institutional or other non-federal funds was reasonable. However, commenters questioned the decision to collect information on the dollar amount for the reporting period (field 9b, Section I, Part 1) because reporting an actual

dollar amount would be difficult, as it is not easy to accurately quantify all forms of in-kind and/or monetary resources contributed to the project. Commenters also stated that there was no rationale included to explain why any of the information was being requested, and that such a collection of information would impose an additional reporting and data collection burden on the projects. Commenters also noted that there is often a variation in in the amount of institutional and non-federal funds a McNair project might receive from year to year and therefore expressed concern as to how the Department would use this information to determine future funding levels for the project.

**Discussion:** Fields 9a and 9b are new fields intended to identify the cash resources, not in-kind support or “soft” money that a McNair project received during the reporting year to serve additional participants or provide additional services. Current McNair APR data shows that oftentimes projects serve more than their funded numbers, yet the Department has no information available to determine whether this is due to additional funds made available to the project or other factors. Knowing the amount of institutional and non-federal funds given to projects would provide useful information regarding the total funds expended in relation to the number of participants served in a given year. Therefore, the intended use of this information was not to determine the amount of federal funding awarded McNair projects. For each competition for new grants the funding parameters and guidelines are based on available appropriations as well as other initiatives or priorities established by the Department for the competition under review. Nonetheless, the Department recognizes that asking for a specific dollar amount of institutional and non-federal funds provided the McNair project may be excessively burdensome and may not be an accurate reflection of the resources available to support the McNair Program.

**Action Taken:** The Department has deleted field 9b. The Department has also deleted field 9a since this information, as a standalone question, will not provide useful nor meaningful information. To further reduce burden, the Department has also deleted fields 9d (Has your project implemented a plan for increasing the number of STEM participants?), and 9e (Has your project developed an evidence-based system for evaluating its own performance?)

Finally, to more closely align the fields for the bachelor’s degree and date of bachelor’s degree, the Department has added in Section 1 a new field entitled “Date Courses Began/First Day of Classes”. This field was added because the McNair Tier 1A process will not be an ongoing activity; therefore, beginning with the 2012-12 reporting year it is critical that students who attain a bachelor’s degree (or equivalent) be placed in the correct cohort year (i.e., field 43, Graduating Cohort Year of the Bachelor’s Degree).

## **SECTION I, PART 2 – PROJECT SERVICES: Column “Number of participants referred to another service provider”**

**Comments:** Commenters expressed concern and requested clarification regarding what was meant by the “number of participants referred to another service provider”. Commenters were unclear if “referral” was intended to capture services provided by someone outside the host institution or if it meant any service provided within the host institution but outside the McNair

project office (e.g., financial aid office). One respondent stated that at their institution all “campus partners are considered to be integral components of the project and would not be considered an outside service provider.” Commenters felt that since the instructions were vague and did not provide a clear definition as to what constitutes a referred service provider, data collected would not be useful nor yield any meaningful results; therefore, they recommended that any information related to a “referred service provider” not be collected.

Four commenters had concerns regarding the definition for “tutoring”. The commenters stated that many McNair students receive tutoring from advanced undergraduate peers that is beneficial and this type of tutoring is excluded in the proposed definition. Therefore, the commenters recommended that the definition be revised to read as follows: “Tutoring means individual or small group tutoring sessions provided by an advanced undergraduate student, graduate student, or a professional staff person.”

One respondent stated that all of the required and permissible services should be listed so that projects can record the number of participants that are receiving the services; and the required and permissible services should be listed in the same order as in Section 647.4 of the program regulations. The respondent further stated that the new proposed APR does not list research or scholarly activities as a required service nor does the APR list “other” as a category.

**Discussion:** The purpose of the field column “*Number of participants referred to another service provider*” was intended to gauge the number of participants who are receiving services directly from the McNair project versus those referred to another service provider. The definition of a service provider was intended to be any entity that is not the McNair project and would include the institution’s financial aid office, counseling center, math department, faculty mentors not part of the McNair program, etc. The intent of this information is to assess how available resources at the institution are being leveraged to enhance the students’ academic potential for graduate studies. However, the Department agrees with the commenters that it may be difficult to separate which services are provided by the project and which services are provided by the institution.

Regarding the definition of “tutoring”, the Department agrees that tutoring can be offered by advanced undergraduate students as well as graduate students and/or professional staff.

With the exception of “research or scholarly activities” services, all other services—both required and permissible are listed in Section 1, Part 2 as they appear in the statute and program regulations. Section 1, Part 2 collects information on project services at the project-level, however, because the services related to “research or scholarly activities” is one of the objectives for assessing PE points, it must be collected and assessed at the student-level, and so to eliminate duplication it is not being collected at the project-level. Finally regarding the omission of “other” from the list, the Department has added a category for “Other” under permissible services as this may provide a more complete picture of the services being rendered by the project.

**Action Taken:** The Department has renamed the first column to read “Number of participants that received the following project services” and deleted the second column “number of participants referred to another service provider.”

With regards to the definition of “tutoring”, the Department has revised the definition in Section 1, Part 2 as follows: Tutoring means academic assistance provided by advanced undergraduate students, graduate students or professional staff.

Finally, as mentioned above, the Department has added a category for “Other” under permissible services.

## **SECTION II – RECORD STRUCTURE FOR PARTICIPANT LIST**

### **B. Participant’s Personal Information**

#### **C. Participants’ Demographic Information and Eligibility Status**

##### **Fields 4 & 5: Student’s Last Name and Student’s First Name**

##### **Field 8: Gender**

**Comments:** Commenters noted that projects should be permitted to update a student’s name as necessary because students commonly change their names (particularly after marriage) and, since the social security number (SSN) can be used to track the student across different reporting periods, then projects should be allowed to change the student’s name. Another respondent noted that the project must use updated names to locate former participants and verify enrollment adding that requiring projects to keep former, incorrect names on the APR file creates unnecessary confusion with recordkeeping and hinders the project’s ability to successfully track the progress of graduates. One respondent asked that the Department allow the projects to hyphenate the last name using the former last name with the current last name. Lastly, a few of the commenters asked that the Department allow the gender field to be updated as necessary.

**Discussion:** Although the Department uses the SSN as a means to match participant records across reporting years; it is used primarily in combination with participant’s first and last name and date of birth. Therefore, the Department does not solely rely on the SSN for matching purposes because more and more projects, as part of their institution’s policies regarding Personally Identifiable Information (PII), do not provide the SSN. Therefore, the Department must rely on the name and date of birth to match records across reporting years. A change to any of these fields may result in a non-match and can potentially impact a project’s PE points and other TRIO data analysis.

With regards to allowing projects to hyphenate the last name using the former last name with the current last name, during the McNair Tier 1A process projects will be allowed to make any necessary changes to the participant’s name, date of birth, and SSN; therefore, if a project wants to use hyphenated names, they can do so. However, once the project completes the Tier 1A process, they will not be allowed to make changes to the student identifier information as doing so will result in the Department not being able to match records across reporting periods.

With regard to the gender field, while the field generally does not require an update, the project can update this field as necessary.

**Actions Taken:** The Department has changed the NOTE: in fields 4 and 5 to read that the information in this field cannot be changed in subsequent reporting periods. Regarding the “Gender” field, the Department has revised the instructions to allow a change.

### **C. Participants’ Demographic Information and Eligibility Status**

#### **Fields 9-14: Ethnicity and Race**

**Comments:** The Department received two comments on the ethnicity and race fields. One respondent asked for clarification regarding persons of mixed race, while the other respondent asked if White-Spanish students are considered underrepresented based on the Hispanic definition. Also, the commenter stated that the white race definition includes North Africans but some students who identify themselves as Africans and whose phenotype is black would be considered White by definition. The same commenter stated that Cambodia and Hong are underrepresented in PhD level programs, yet using this definition they would not be considered as being from an underrepresented group.

**Discussion:** The format for the ethnicity and race fields is federally mandated. In 1997, the Office of Management and Budget published new revised standards for the collection of data on race and ethnicity. In accordance with these standards, the Department published final guidance in the Federal Register on October 19, 2007 (72 Fed. Reg. 59267) on the collection and reporting of racial and ethnic data by educational institutions and other projects. This change authorizes individuals to more accurately reflect their racial and ethnic background by not limiting responses to only one racial category, and expands reporting options to seven categories (American Indian or Alaska Native, Asian, Black or African American, Hispanic, Native Hawaiian or Other Pacific Islander, White, and Two or More Races). Therefore, the format allows for multiple responses in the race categories, so a person who self-identifies as “mixed race” can choose as many racial categories as applicable.

With regard to the commenter’s question on whether a White-Spanish participant is considered underrepresented, the regulatory definition of groups underrepresented in graduate education (see 34 CFR 647.7) includes Hispanics and does not differentiate on the basis of race. Therefore, a White-Spanish participant would be considered part of an underrepresented group. Concerning the definition as it relates to North Africans, since the regulations allow for self-identification, if a participant who is from North Africa identifies their phenotype as black, then the project can select “Yes”, in the race field, Black or African American. Finally, 647.7 of the final regulations (*What definitions apply?*), states: The following ethnic and racial groups are considered underrepresented in graduate education: Black (non-Hispanic), Hispanic, American Indian, Alaskan Native (as defined in section 7306 of the Elementary and Secondary Education Act of 1965, as amended (ESEA)), Native Hawaiians (as defined in section 7207 of the ESEA), and Native American Pacific Islanders (as defined in section 320 of the HEA). Therefore, if a Cambodian or Hong does not self-identify as any of the groups underrepresented in graduate school, then they are not considered being from an underrepresented group.

**Action Taken:** None

### **Field 15: Number of hours worked**

**Comments:** The majority of the commenters felt strongly that the collection of data to report the number of hours a student worked is unduly burdensome, and would yield unreliable information. For example, one commenter stated that student employment hours constantly fluctuate depending on their studies and group involvement. A few commenters stated that there is no congressional mandate for collection of this information. The prevailing recommendation was to delete this field.

**Discussion:** The intent of this question was to determine factors that may affect the timely completion of a degree, relationship of hours worked to the adequacy of McNair resources available to students, as well as the relationship between hours worked and degree persistence. Data derived from this question may assist the Department in understanding these relationships and may provide additional information regarding other time demands that may impact time to degree completion for McNair participants compared to a similar group of non-McNair students. Furthermore, under Section 402H of the Higher Education Act, as amended, the Department has the statutory mandate to collect data that it deems necessary to comply with the congressionally mandated reports to congress related to program outcomes.

The Department concurs with the commenters that the collection of this information may pose an undue burden on projects in that they may not have the capability to accurately monitor and accurately report student hours worked.

**Action Taken:** Field #15 (Number of hour worked) has been deleted from the APR.

### **D. Participant's Enrollment Information**

#### **Field 19: First School Enrollment Date (Postsecondary Education)**

**Comments:** Several commenters sought clarification regarding the instructions for the first enrollment date field to more accurately reflect the distinction between students who enrolled in postsecondary courses with the intent of earning a degree versus those who enrolled in non-degree courses. For example, some commenters suggested that the reported first postsecondary enrollment date should be the date a McNair participant first enrolled in a degree seeking program.

**Discussion:** The purpose of this data field is to determine the length of time from initial enrollment in postsecondary education through undergraduate, graduate, and doctoral degree completion. Therefore, the enrollment date is the initial date the student first enrolled in postsecondary education at any institution. As such, per APR instructions, the "first postsecondary education enrollment date" is the date the McNair participant first enrolled in a program of postsecondary education. Projects are to provide the first enrollment date for all students served by the McNair project even if the student did not begin or is not currently enrolled at their institution. Students who are in a high school bridge-to-college programs or students who take college courses while in high school are not included in this definition.

**Action Taken:** The Department has revised the instructions to read that first postsecondary enrollment date is the first date a participant enrolled in a program of postsecondary education and does not include the date a participant enrolled in a high school bridge-to-college programs/dual enrollment program nor the first enrollment date a participant took college courses while enrolled in high school.

Finally, the field has been renamed as follows: “First Postsecondary Education Enrollment Date”.

### **Field 21: Grade Level at Project Entry**

**Comments:** Three commenters requested removal of the option of “graduate student” as a part of this field given that McNair projects are funded to serve only undergraduate students.

**Discussion:** The Department concurs with the commenters’ suggestion.

**Action Taken:**

The Department has deleted option 7, graduate students, from this field.

### **Field 23: Enrollment Status** *(during academic year being reported)*

**Comments:** One commenter asked if students who were enrolled part-time were to be classified as option 2—Part of an academic year (one semester or one or two quarters) if they are enrolled for a full year. Several commenters stated that in the past, projects were asked to provide this information only for undergraduate students, because they have access to student records at their institutions. According to these commenters, projects do not have access to the records of alumni enrolled in graduate programs at other institutions and the National Student Clearinghouse database is not reliable. Commenters felt there is no value added to knowing whether or not graduate students may not have been enrolled a few semesters. The majority recommended limiting this question to undergraduate students.

**Discussion:** The field options proposed captures the attendance status based on academic term(s) and not on the number of hours enrolled during the academic year. If a student who was enrolled part-time attended the Fall and Spring semester of the academic year being reported, then the enrollment status would be “1 = Full academic year (both semesters or three quarters).” Regarding the comments related to this field only being applicable to undergraduates, the commenters are incorrect. Projects have always been required to provide this information for both undergraduates and graduates students. This field has been used to calculate the graduate persistence and enrollment rates for GPRA. The Department acknowledges the difficulty in obtaining the requested level of detailed information for prior-year participants, and as such, has retained the format and options from the previous APR reporting periods (i.e., enrolled and not enrolled). However, projects should continue to verify the enrollment status for all of their participants—both current and prior as well as for undergraduate and graduate students.

**Action Taken:** The Enrollment Status field options have been modified so they are the same as those used in the previous APRs:

Participant's enrollment status is:

1 = Enrolled

2 = Not Enrolled

0 = Unknown

## **Field 25: Funding Source**

**Comments:** Several commenters wanted to know the reason for collecting data on funding sources, and indicated that the categories should be more inclusive as there are many additional funding sources that support a student other than those that are listed, such as scholarship awards, fellowships, savings plans.

**Discussion:** The intent of this field is to determine if the cost of serving the student in the McNair project was supported with Federal funds only or partially supported with non-federal funds. For example, if non-federal funds were used to provide the research stipend for a McNair participant, the project would select the option for "partially supported with non-federal funds." The project would not report on other sources of financial aid the student receives for their undergraduate education. Finally, upon further review of the options available for this field, the Department has determined that option 2 (non-federal funds) is not needed since McNair projects are federally-funded and thus all McNair participants receive some services paid for with federal funds. .

**Action Taken:** The current option 2 (non-federal funds) has been deleted and option 3 (partially supported with non-federal funds) has been renumbered option 2.

## **E. Participant's Academic and Degree Status**

### **Field 26: Main Field of Undergraduate Study**

**Comments:** The majority of commenters requested that projects be allowed to update the information in this field because data indicates it is not uncommon that an undergraduate will change his/her major during their course of study. The commenters further stated that projects be allowed to choose multiple responses since many students will have more than one major. Finally, one commenter requested clarification on whether McNair programs are required to serve participants in the Science, Technology, Engineering and Mathematics (STEM) education fields.

**Discussion:** This field collects information on the field of study the bachelor's degree (or equivalent of a bachelor's degree) was earned/conferred, not on the participant's intended field of study. Thus, once the student attains a bachelor's degree, the project is to report the main field of study. The requirement for this field is to enter the participant's major field of study

(e.g., degree major). Because the format for APR data collection does not permit us to collect multiple responses in one field, a project cannot report on multiple fields of study. Instead of adding another data field to collect data on the second major, for those participants with double majors, the project can use its discretion in selecting the major field of study.

Finally, regarding the comment requesting clarification on whether McNair projects are required to serve participants in the Science, Technology, Engineering and Mathematics (STEM) fields, please note that since the inception of the McNair Program, the focus of the program has been inter-disciplinary in terms of the types of degrees being sought by eligible participants. However, under FY 2012 grant competition, McNair applicants were given the opportunity to address one or more of the three competitive preference priorities listed in the Notice Inviting Applications for New Awards for FY 2012. The goal of Competitive Preference Priority 1: Promoting STEM education is to increase the number and proportion of McNair participants prepared for graduate study in the STEM fields.

If an applicant chose to address this priority and received priority points, the Department expects the project to focus on serving students who have chosen to major in one of the STEM disciplines, as proposed in the project's approved application. If an applicant did not address the STEM priority or addressed the priority but did not receive priority points, the project is not required to serve students in the STEM fields. However, data cited in the McNair application package show that 99 percent of McNair grantee institutions funded in the 2007-12 grant cycle offered at least one academic program in the STEM fields. Therefore, the Department believes that most McNair projects, including those that did not address the STEM priority, serve some students pursuing STEM majors. Therefore, to collect data on the number of McNair participants pursuing STEM majors, the Department has added a new field to the APR: "STEM Major (Yes/No)"

**Action Taken:** To clarify that the information requested is the participant's field of study for the earned bachelor's degree, the Department has changed the field name from "Main Field of Undergraduate Study" to "Main Field of Study (Bachelor's Degree). The instructions have also been revised as follows:

"Use the *Main Field of Study List* located in the instructions and provide the three-digit code for the main field of study for a participant who has **EARNED** a bachelor's degree or equivalent of a bachelor's degree. If the participant is a graduate student or they have earned a doctorate degree, provide the main of field of study for their undergraduate (bachelor's) degree. For those participants with double majors, the project can use its discretion in selecting the main field of study. If the participant has not earned a bachelor's degree, enter "001". If you do not know the participant's undergraduate main field of study, enter "000". Once reported, do not update in subsequent reporting periods."

A new field entitled "STEM" has been added to the APR to allow projects to indicate the McNair participant was in a STEM or other non-STEM field.

## **Field 28: Attendance at Community College**

**Comments:** Several commenters requested additional clarification as to what information should be reported in this field. They noted that the field name suggests projects should report if a student ever attended a community college but the instructions referenced students who have transferred. Furthermore, commenters felt that clarification is needed on whether the purpose of this question is to determine how many students begin at a community college or how many participants complete a program at a community college before transferring to a four-year institution. For example, one commenter pointed out that, in some instances, students take classes at a community college, and subsequently apply for admission to a four-year institution without completing the transfer admission process.

**Discussion:** The purpose of this field is to examine student outcomes based on community college attendance. There are numerous studies that document different outcomes for students who attended community colleges at the undergraduate level.

The Department recognizes the ambiguity and inconsistency that currently exists between the field name and the instructions. The current field name indicates attendance status at a community college (Yes/No) while the instructions reference transfer students. The Department's intent is to closely align this field with the Baccalaureate and Beyond (B&B) survey and the Survey of Earned Doctorate (SED); therefore, the appropriate format is attendance at a community college or two-year institution irrespective of whether or not the participant transferred.

**Action Taken:** The Department has modified the field name as follows: Attendance at Community College/2-Year Institution. The instructions have been revised to closely align with the field name, which collects information on whether or not the student attended a community college and/or 2-year institution. Finally, the database column has been revised to "AttCommColl."

## **Field 29 and 30: Bachelor's or Equivalent Degree and Date of Bachelor's or Equivalent Degree**

**Comments:** A few commenters sought clarification on what is meant by 'equivalent of a bachelor's degree' while four commenters recommended deleting this term from the field and instructions.

**Discussion:** In 2007-08, several McNair projects brought to the attention of the Department that certain institutions do not award/confer a baccalaureate degree until the student is either enrolled in graduate school or has completed their graduate studies. As such, the Department developed a policy to address this issue. The policy of conferring a baccalaureate degree after enrolling and/or completing graduate studies is known as a "dual degree program". To accommodate this policy, in reporting period 2007-08, the Department modified the degree field to allow McNair projects to report a baccalaureate degree if the McNair participant was enrolled in a dual degree program. Therefore, per APR instructions "an equivalent of a bachelor's degree" means any McNair participant who did not earn a baccalaureate degree upon completion of their

undergraduate studies because their institution does not confer baccalaureate degrees until the student is enrolled or has completed their graduate studies.

**Action Taken:** None

### **Field 31: Academic (Cohort) Year of Bachelor's Degree**

**Comments:** One respondent stated that TRIO legislation does not require students to attend graduate school directly after earning a baccalaureate degree, since many students will take time off between undergraduate and graduate study. A few commenters recommended that the field name be changed to “Graduating Cohort Year of Bachelor’s Degree” as this will eliminate confusion especially because many institutions use the term “cohort” interchangeably. Finally, a few commenters stated that it is critically important to allow programs to reinstate students to the APR who were previously coded in the Tracking Field as “tracking complete” and subsequently drop from the APR.

**Discussion:** As discussed previously, the standard objectives for the FY 2012 grant competition established the point of measurement for the postbaccalaureate enrollment objective. The standard objectives were part of the 2012 application package and the public was invited to provide comments. In addition, current McNair regulations in Section 647.22(a) (2) (How does the Secretary evaluate prior experience points?) states that “*the Secretary uses the approved project objectives....to determine the number of PE points to be allotted.*” The approved project objectives are in the McNair Profile sheet of the FY 2012 application and it is these objectives the regulations are referencing. The objective for the graduate school enrollment is as follows:

*“% of McNair Program bachelor’s degree recipients (or equivalent) will be accepted and enrolled in a postbaccalaureate program of study by the fall term of the academic year immediately following the completion of the bachelor’s degree (or equivalent).”*

The Department agrees with the comments requesting the field be renamed in order to reduce confusion. Finally, regarding the reinstatement of previously dropped records, please see the discussion under “**New Reporting Requirements**” and “**Field 43: Highest Graduate Degree Earned**”.

**Action Taken:** The Department has revised the field name as follows: “Graduating Cohort Year of Bachelor’s Degree” and has also renamed the database column name to BADegCohortYr.

## **F. Participant's Research and Internship during the Academic Year**

### **Fields 32 and 33: Research and Internship**

**Comments:** Several commenters noted that although field 33 seems to be referring specifically to the McNair internships for which the student is paid the McNair stipend, there is some confusion since the field name does not agree with the instructions. These commenters recommended changing the name of the field from “Internship” to “McNair Internship” so that the name of the field agrees with the definition in the instructions. Other commenters suggested that the name for field 32 be changed to “Outside Research” so as to not be confused with the research/internship activities provided by or through the McNair program.

Some commenters noted the important and valuable distinctions between research and internships, and recommended revising options 1-3 for field 33 by replacing the words “research activity” with the word, “McNair internship” to differentiate between field 32 (Research) and field 33 (Internship).

In addition, commenters stated that it is vital that these fields (both title and instructions) reflect the language actually used in the Program Objectives: “research or scholarly activities” instead of “research and scholarly activities”. Other commenters suggested clarifying the language in field 32 (both title and instructions) to be inclusive and ask, “To what extent did the student participate in research and/or scholarly activities?”

They asserted that the instructions state that these fields capture information needed to determine if the project met its “Research and Scholarly Activities objective ...” and, therefore they felt that while the definition of research may remain as it is, something should be added that shows that scholarly activities other than just research is acceptable, but it should be stated broadly, as there is no way to come up with an all-inclusive list. One suggestion was to add a field before or after fields 32 and 33 for “Scholarly Activities” that is not specifically research activities as defined in the instructions and leave fields 32 and 33 as specifically research activities, with field 33 referring to the Research Internships for which the student received the stipend. Other commenters recommended adding a fourth option that states: “4 = Completed Scholarly Activities associated with conducting a research project” and recommended that when calculating the PE points for the Research or Scholarly Activities objective, both responses 3 (Complete all the components of the Research activity) and 4 be used.

Some of the commenters believe an additional field should be added for “Other Scholarly Activities” and that this field be used when assessing PE points. They further suggested that scholarly activities be defined. Other commenters provided lists of scholarly activities they consider related to building the scholars’ research skills. The commenters’ list of scholarly activities includes:

- Institutional Review Board (IRB) training and certification (needed by any student who will be doing human subjects research),
- ethical conduct of research training and certification,

- Institutional Animal Care and Use Committee (IACUC) training and certification (for any students whose projects will involve the use of animals),
- workshops on using library research resources,
- workshops to enhance presentation skills, and attendance at disciplinary conferences.

One commenter felt the regulatory definition was unduly restrictive and provided the following example: “Some scholarly activities are engaged in without the mentor in the students’ disciplines (e.g., attendance and/or presentation at an undergraduate research conference where perhaps the McNair staff are with the students, but not their specific disciplinary mentors).

**Discussion:** The Department agrees with the commenters regarding the confusion in the terms used in the field names and the instructions for fields 32 and 33. The Department further notes that field 33 is referring specifically to the McNair research internship for which the student is paid the McNair stipend. However, the Department disagrees with the commenters’ who recommended changing the wording in field 33 from research to internships since this change might be further confusing. The purpose for having two data fields related to the Research or Scholarly Activities objective is to collect information on which participants receive the McNair stipend. 34 CFR 647.30(b): Allowable costs, states, in part, that the projects may give participants “stipends of up to \$2,800 per year for students engaged in research internships...”; therefore, the Department believes the name for field 33, and the accompanying instructions and definitions, should be changed from “Internships” to McNair Research Internship” to more accurately reflect the data being collected.

The Department disagrees with the commenters’ recommendations to consider any scholarly activity as meeting the regulatory definition of “Research or scholarly activities”. 34 CFR 647.7 defines research or scholarly activities as follows.

*“Research or scholarly activities means an educational activity that is more rigorous than is typically available to undergraduates in a classroom setting, that is definitive in its start and end dates, contains appropriate benchmarks for completion of various components, and is conducted under the guidance of the an appropriate faculty member with experience in the relevant discipline.”*

Therefore, for a scholarly activity to meet the regulatory definition, it must:

- (1) be more rigorous than is typically available to undergraduates in a classroom setting;
- (2) have definitive start and end dates;
- (3) contain appropriate benchmarks for completion of various components; and
- (4) be conducted under the guidance of the an appropriate faculty member with experience in the relevant discipline.

Therefore, simply attending a professional meeting or workshop (e.g., workshops on using library research resources or workshops to enhance presentation skills, and attendance at disciplinary conferences), in and of itself, might not meet the definition as it might not include various components or include guidance from a faculty member in a relevant discipline. However, the activity might meet the definition if the activity also included the McNair

participant presenting at a professional conference his or her research that was conducted under the guidance of a faculty member.

In addition, the Department agrees that there are scholarly activities that would meet the regulatory definition other than “pure” research. During the process of promulgating the new regulations for the McNair program, commenters stated that the definition of research or scholarly activities in Sec. 647.7 should be expanded to include examples such as developing a research proposal, implementing reporting, and presenting and publishing research. The commenters argued that adding these activities as examples in the definition would clarify that “research” encompasses a range of scholarly activities that are more rigorous than typically available to undergraduates in a classroom setting. The Department agreed with the commenters that the examples could be appropriate parts of a doctoral program and accordingly could satisfy the requirement for research or scholarly activities under the McNair program. The Department further stated that because there are so many examples of activities that could be covered in this definition, the Department did not include any examples in the regulations but would consider including them in non-regulatory guidance.

The purpose of fields 32 and 33 is to collect data needed to award PE points for the Research or Scholarly Activities objective. The regulatory definition of research or scholarly activity must be used to determine which participants completed appropriate research or scholarly activities during the academic year.

To facilitate the reporting in this field, the Department has taken the commenter’s recommendation to add an additional field for “Other Scholarly Activities” which would be used when assessing PE points and has also taken the commenter’s suggestion of defining other scholarly activities.

**Action Taken:** Field #31, *Research*, has been renumbered field #32 and the options have been reordered. Furthermore, a new field has been added to capture information on “*Other Scholarly Activities*” and formerly field 32, *Internship*, has been renumbered #34, the options have been reordered, and the field has been renamed “*McNair Research Internships*” to more accurately reflect the data being collected. Finally, the definition for “research activity” has been added at the end of each APR field along with guidance on how to determine whether or not the participant participated in a research activity (see note below). Nonetheless, for specific information regarding the revisions, please refer to the APR form and instructions.

**NOTE:** “*Research means an educational activity that (1) is more rigorous than is typically available to undergraduates in a classroom setting, (2) is definitive in its start and end dates, (3) contains appropriate benchmarks for completion of various components, and (4) is conducted under the guidance of the an appropriate faculty member with experience in the relevant discipline.*”

Per APR instructions, you must be able to answer “Yes” to all of the four (4) criteria above in order to consider the participant as having participated in research. For example, if the activity does not have a definitive start and end date, then the activity is not considered research.

## G. Participant's Graduate School Information

### Field 34: Graduate School Admissions Test

**Comments:** Several commenters questioned the value of this field, since McNair funding for the GRE is not an allowable expense. These same commenters also stated that not all graduate schools require admission tests. Some commenters indicated that the collection of this information should only apply to students in their senior year; therefore, this data should be collected only in the year in which the student earns a bachelor's degree. Another respondent stated that since some students take the test multiple times, it might be useful to collect data at different points, such as in the junior and senior year. This same respondent recommended providing additional instructions to clarify the purpose of this question so it would yield useful data. Finally, one commenter stated that this information was not previously collected for alumni, thus they will need to code these students as "0—Unknown". They also stated that there is no option available for students who have not earned a bachelor's degree.

**Discussion:** The purpose of this field is to address issues related to sample selection bias when conducting the comparative analysis for the congressionally mandated reports. Therefore, the field will be used to determine a McNair participant's intent to enroll in graduate school. Research indicates that it is more likely a participant will enroll in graduate school if they have taken a graduate school admissions test. This is a field that once reported does not require an update. As such, the number of times a participant takes the test, when they take the test (i.e., junior year), the scores, and the type of tests taken (e.g., GMAT, GRE, etc.) is not relevant for the purpose of determining intent to enroll in graduate school. Finally, regarding the comments related to allowable expenses, even though the Department is requesting this information, per regulations GRE tests are unallowable expenses.

**Action Taken:** The APR been revised to address the comments listed above as follows:

Form: Added an option (99—Not applicable) for participants who are not required to take a graduate school admissions tests or for participants who have not yet earned a bachelor's degree.

Added the following note below the field: "**NOTE:** Select "Yes" only if the participant has earned a bachelor's degree and has taken a graduate admissions test. If you do not know if the participant has taken a graduate admissions test, please select "0" (Unknown). Once reported, do not update in subsequent reporting periods.

### Field 35: Number of Graduate School Applications

**Comments:** The comments submitted for this field were similar to those for the Graduate School Admissions Test. For example, one commenter expressed concerns about coding this field as "Unknown" and indicated that there is no applicable category for those students who never earned a bachelor's degree. Other commenters questioned the need for projects to report the number of applications McNair participants submitted to various graduate programs. The overwhelming suggestion was to collect this data only once for the year in which the student earns a bachelor's degree.

**Discussion:** Again, the purpose of this field is to address issues related to sample selection bias when conducting the comparative analysis for the congressionally mandated reports. Therefore, the field would be used to determine a McNair participant's intent to enroll in graduate school, as research indicates the more graduate school applications a participant submits, the more likely they intend to enroll in graduate school. However, the Department does acknowledge the challenges in collecting this information in its current format (i.e., number of applications submitted), and also recognizes that there is very little value in collecting the information in a Yes or No format, therefore, the Department has removed the field.

**Action Taken:** The field has been deleted.

**Field 36: Graduate School Enrollment Status** (at the beginning of the 2013-14 academic year)

**Comments:** The majority of commenters recommended adding an additional option to this field to capture those baccalaureate degree recipients who enrolled in “impactful, highly competitive” programs or activities such as Fulbright, AmeriCorps, and Teach Abroad prior to enrolling in graduate school. These commenters contend that while collecting this information would not change how PE is calculated; the addition of this information provides a more complete picture of graduate school enrollment. In addition, some of these commenters maintain that McNair projects are being penalized when students choose to participate in prestigious and academically advanced internships and fellowships prior to enrolling in graduate school.

**Discussion:** The McNair Program Profile which is governed by the regulations under 647.22(a)(2) for the objective “graduate school enrollment” is very specific—to earn PE points a McNair scholar must enroll in graduate school in the fall term immediately after attaining a baccalaureate degree. Therefore, for the purpose of calculating a project's PE points, baccalaureate degree recipients who did not enroll in graduate school in the fall immediately after completing their baccalaureate degree because they enrolled in a highly competitive program cannot be counted as having enrolled in graduate school. However, the Department recognizes the value in collecting this information for future analyses; therefore, an option has been added to the field to account for participants who do not enroll immediately after attaining a baccalaureate degree because they enrolled in competitive programs or activities, including Fulbright, AmeriCorps, Teach Abroad, research fellows, etc.

Regarding the comment related to projects being penalized because their participants do not immediately enroll in graduate school due to commitments after graduation (e.g., Fulbright), the intent of PE is to reward projects who have met and/or exceeded their approved project objectives as provided in their application, therefore, PE points are extra credit a project can earn if, at a minimum, they meet their objectives, so the statement that projects are being penalized is a misnomer—projects are not being penalized.

**Action Taken:** The Department has revised the APR to collect information on project participants who do not enroll in graduate school immediately after completing the baccalaureate program because they enroll in highly competitive programs or activities as follows:

Form: Added option, Did not enroll in a postbaccalaureate degree program (for participants who received a bachelor's degree in this reporting period but participated in competitive programs or activities such as Fulbright, AmeriCorps, and Teach Abroad).

Added the following note below the field: “**NOTE:** Select option #3 if the student **received** a bachelor's degree (or equivalent) in *this* reporting period but **did not enroll** in a post baccalaureate degree program in the Fall term of the *next* academic year because they enrolled/participated in competitive programs or activities such as Fulbright, AmeriCorps, Teach Abroad, etc.)

### **Field 37: Date of First Graduate School Enrollment**

**Comments:** Two commenters stated that reporting on the semester and year of entry is sufficient for this field. One commenter indicated that this field is redundant since projects provide information within the APR already if a student entered a graduate program after receiving their bachelor's degree. The commenter also pointed out that programs track students ten years from the date they received their bachelors, not ten years from when they entered graduate school.

**Discussion:** The Department recognizes that this information may not be readily available for all applicable project participants; however, collecting the information as proposed will yield more valid and reliable responses. In addition, per APR instructions, if the project does not know the complete date, they can use 15 for the day and enter their best estimate for the month.

Regarding the information being redundant, the Department disagrees with the respondents comment because not every participant who completes a baccalaureate degree immediately enrolls in graduate school. Therefore, this field is the only source of information on the graduate school enrollment date for those McNair participants that do not enroll in graduate school by the fall term after earning the bachelor's degree. Furthermore, research shows that many students delay enrollment in graduate school by one or more years. Thus, one of the GPRA performance measure for the McNair program is the number and percentage of McNair participants that enter graduate school within three years of completing the bachelor's degree, therefore, the Department needs the data collected in this field to accurately calculate the three-year graduate school enrollment rate..

**Action Taken:** None

### **Field 38: Institution Attended First Year Graduate Students**

**Comments:** One commenter noted that this field captures information only for first-year graduate students; however, they stated that there were no clear instructions on how to report graduate students who are beyond the first year of graduate school as well as no explanation regarding the purpose for collecting this information. One commenter stated that this field would impose a significant reporting burden on projects if they are required to collect this information for all students.

**Discussion:** The purpose for collecting this information is to construct profiles of the characteristics of institutions to which McNair participants first enroll in graduate school. Regarding the comments related to lack of clarity and undue burden, the Department concurs that the field and instructions lack clarity. The Department also recognizes that the collection of this data for all graduate students may impose undue burden. Therefore, the Department is requesting that projects provide the NCES IPEDS ID only for the first graduate school attended by the McNair participant. Since the Department is only collecting data on the graduate school first attended, once the information has been reported, the project does not need to change or update the information should, for example, the participant transfer to another institution.

**Action Taken:** To clarify the information requested, the Department has changed the name of this field to “Graduate Institution First Attended”.

The value field content now reads: “Participant’s NCES IPEDS ID of the graduate institution first attended.” The options have been revised as follows:

888888 = Not applicable (Participant has not completed undergraduate studies or has completed undergraduate studies but did not enroll in graduate school.)

The instructions have also been revised as follows: “Provide the six-digit postsecondary institution NCES IPEDS ID for graduate institution first attended. Enter “888888” if the participant has not completed undergraduate studies or has completed their studies but did not enroll in graduate school. If you do not know the participant’s graduate institution first attended, please enter “000000”. Once reported, do not update in subsequent reporting periods. You can obtain the IPEDS ID from the following web site: <http://nces.ed.gov/globallocator>.”

**Field 39: Graduate Student’s Main Field of Study** (*at the time of entry into graduate school*)

**Comments:** One commenter asked for clarification on how to report the main field of study for participants that received a graduate degree in a previous reporting period but are no longer enrolled in graduate school.

**Discussion:** As in previous reporting years, main field of graduate study allows for reporting of the field of study the McNair participant undertakes in graduate school at the time they first enter graduate school. For graduate students who are no longer enrolled in graduate school or for students who complete their graduate studies, the project should provide, to the extent possible, the main field of study at the time the participant first entered graduate school. If the project does not know the main field of study for these participants, the project should enter “001”. Students who are enrolled in an undergraduate program or those who did not enroll in graduate school should be coded as “001”. Note that once the main field of study has been provided projects should not update the information in subsequent reporting periods.

**Action Taken:** The form and instructions have been revised as follows:

“Using the *Main Field of Study List* provided in the instructions, enter the three-digit code for the main field of study at the time the participant entered graduate school. If the participant has not earned a bachelor’s degree enter “001”. If you do not know the participant’s undergraduate main field of study, enter “000”. Once reported, you should not have to update in subsequent reporting periods. ”

#### **Field 40: Graduate Assistantships**

**Comments:** Most commenters contended that requiring projects to report assistantships each year the student is enrolled in a graduate program imposes an unfair reporting burden on project staff and students. They also commented that while graduate school enrollment and degree attainment is verifiable through the National Student Clearinghouse or the graduate institution, this field will require annual disclosure of former program participants’ personal and/or financial information. Some commenters suggest eliminating this field to further reduce the reporting burden due to the lack of or untimely response from McNair Scholars. Another commenter suggested modifying the field name to “Graduate Assistantships and Fellowships” to more realistically reflect the composite nature of graduate funding packages.

**Discussion:** The purpose of this field is to identify the type of assistantships completed by students as it is an important element in understanding graduate persistence and time to completion. This field, in conjunction with other data fields, is critical when conducting analysis between McNair Scholars and a comparative group and will be used to address Section 402H of the Higher Education Act, as amended. With regard to the suggestion to rename the field to include fellowships, the Department disagrees with this suggestion because fellowships do not typically include the work requirement imposed by assistantships. Since time constraints, such as employment, can be indicators towards persistence, collecting fellowship information would not be relevant. In addition, the Department acknowledges the commenters’ concerns regarding the burden in collecting this information; however, this information is a key indicator of graduate school persistence. Thus, the Department strongly encourages projects to provide as much information on project participants as possible. Regarding the comments related to the release of former program participants’ personal and/or financial information, the Department only requires information as to whether or not a first-year graduate student has received an assistantship in the reporting period and not the dollar amount received. To address the concerns about the burden resulting from annual collection of this information, the Department has decided to only require projects to provide information on assistantships for first-year graduate students.

**Action Taken:** The field has been revised as follows:

Field name: Graduate Assistantships (*for first year graduate students only*). In addition, under the column “Valid Field Content”, the question has been revised to “What type of assistantship did the first-year graduate student receive in this reporting period?” Finally, the “NOTE” has been revised to “**NOTE:** If the participant is not a first year graduate student in this reporting period (e.g., undergraduate, 2<sup>nd</sup> year graduate, etc.), please select option 99.

**Field 41: First Year Graduate Student Persistence** *(at the beginning of the 2013-14 academic year)*

**Comments:** Several commenters suggested the addition of an option to indicate the difference between a student who drops out of graduate school (i.e., never completes their graduate studies) versus those who complete their graduate studies in a year or less such as those enrolled in accelerated programs. They expressed concerns that if this field option is not added, projects may be penalized for students who completed accelerated master's degree programs. In addition, two commenters were concerned that vital information will be lost because the college grade level field that determines the year enrolled in graduate school is no longer being captured. Finally, one commenter recommended that the graduate school enrollment field, which is used to calculate PE points for the graduate enrollment objective, also capture information on all baccalaureate degree recipients who enrolled at any time in graduate school. The commenter contends that by collecting this information, a more accurate picture of persistence will be captured.

**Discussion:** The Department is required to adhere to the statutory provisions under Section 402A of the HEOA in the calculation of the Prior Experience (PE) Points objective. The statutory mandate is meant to address the intent of the McNair program which is the attainment of the doctorate degree. A graduate student who drops out and a graduate student who completes their graduate studies because they were enrolled in an accelerated program but does not continue to enroll in graduate school are not meeting the intent of the program. Regarding the comment related to projects being penalized because the participant does not persist in graduate school because the participant was in an accelerated program, as stated previously, the intent of PE is to reward projects who have met and/or exceeded their approved project objectives as provided in their application, therefore, PE points are extra credit a project can earn if, at a minimum, they meet their objectives, so the statement that projects are being penalized is a misnomer—projects are not being penalized. Nonetheless, the Department sees the value in obtaining this information for other analysis purposes and has added an option to capture information for participants who have completed an accelerated graduate program but did not persist with their graduate studies.

Regarding the commenters' concerns related to the Department no longer requiring projects to provide information on a participant's college grade level especially those who are in graduate school, the Department agrees with the commenters' concerns, and as such, a field to capture the graduate year of study for participants who are enrolled in graduate school in the reporting period. Finally, the commenters' proposed recommendations that modify the graduate school enrollment field to capture information on the graduate status of all baccalaureate degree recipients regardless of when they enroll in graduate school may potentially create confusion in that multiple types of information would be collected for a PE field whose sole purpose is to measure graduate school enrollment. The Department's goal, particularly as it relates to the PE fields, is to be transparent and as such capture the information as clear and concise as possible.

**Action Taken:** Field 39, First Year Graduate Student Persistence, has been revised as follows:

Added option “No longer enrolled in a postbaccalaureate degree program (for participants who were first year graduate students in this reporting period but did not enroll in graduate school at the beginning of the 2013-14 academic year because they completed an accelerated graduate program)”

Added the following field and options to capture information on the year the participant was enrolled in graduate school:

Field name: “Current Year of Graduate Study”

1 = 1st yr. graduate/professional including those who received program services as undergraduate during the reporting year

2 = 2nd yr. graduate/ professional

3 = 3rd yr. graduate/professional

4 = Beyond 3rd yr. graduate/professional program

99 = Not enrolled in a postsecondary or graduate degree program during the academic year being reported including all undergraduate students

0 = Unknown

#### **Field 42: Reason Left Graduate School**

**Comments:** Some commenters asserted that the options presented are a “laundry list” from which it would be difficult to select one answer while others felt that the options should be revised to more accurately reflect the reasons students leave graduate school. In addition, some commenters stated that it is difficult to obtain this information for students who have left graduate school because they do not share this information. One respondent requested clarification as to whether the reporting requirement for this field is for the current reporting period only or for any year.

**Discussion:** While the Department acknowledge that there are other reasons not listed for leaving graduate school, this field aligns with the Baccalaureate and Beyond (B&B) survey which is one of the surveys that the Department will use to conduct comparative analysis on project participants as statutorily required. Nonetheless, to accommodate the alignment with the B&B survey and the commenters’ concerns, the Department has modified the field.

Though the Department recognizes the difficulty in collecting this information from students who may be reluctant to share it, policy mandates that McNair projects provide and track students for a period of ten years. For this particular field, the response relates to the status of the students in the reporting period. Finally, this is a field that does not require an update, so if a project has reported the reason a participant has left graduate school, unless the participant re-enrolls, projects should not update the field in subsequent report periods.

**Action Taken:** The Department has revised the field as follows:

**Reason participant left graduate school is:**

- 1 = Academic Problems
- 2 = Change in family status
- 3 = Change in program
- 4 = Scheduling or availability
- 5 = Military obligation
- 6 = Job, needed to work or other financial reasons
- 7 = Taking time off
- 8 = Personal/health problems other than financial
- 9 = Pursue other interests
- 10 = Student considers their education complete
- 11 = Student is deceased
- 12 = Other
- 77 = Not applicable, undergraduate student or never enrolled in graduate school
- 88 = Not applicable, still enrolled in graduate school
- 99 = Not applicable, completed doctoral degree program
- 0 = Unknown

**Field 43: Highest Graduate Degree Earned** (*at the end of the academic year*)

**Comments:** Some commenters expressed concerns that the options provided for the doctoral degree were not all inclusive. For example, one respondent observed that the Doctor of Nursing Practices should be included as an option while others felt a Doctor of Public Health, Doctor of Musical Arts, and Doctor of Occupational Therapy should also be listed. One commenter stated, “The International Affairs Office of the U.S. Department of Education lists over 20 frequently awarded research doctorate degree titles accepted by the National Science Foundation (NSF) as representing degrees equivalent in research content to the Doctor of Philosophy (PhD) degree.” Another respondent requested clarification on how to code participants who obtain a Specialist’s degree after the master’s degree, but prior to the Ph.D. or Ed.D. One respondent expressed concerns that students who were reported as having earned a JD and subsequently enrolled in a PhD program were marked as tracking completed in a previous reporting period and so were dropped from the data file. The commenter states that they have not been able to enter the educational achievement nor retain the record on the file. Several commenters suggested that projects should have the ability to update a student’s record if a second master’s degree was attained, or at a minimum, provide guidance on whether or not the field should be updated if a second master’s was earned.

**Discussion:** With regards to concerns that the current list is not all inclusive, the Department appreciates the need to be as inclusive as possible but also understands the unwieldiness of listing all research intensive doctorate degrees; therefore, the Department has listed the most frequently awarded research based degrees. Regarding the research doctorate degree list maintained by the International Affairs Office of the U.S. Department of Education which includes over 20 research based doctorates, the Department has provided options for the most

common research intensive doctorate degrees along with an “Other research-intensive doctorate” option. For further information regarding research intensive doctorate degrees, please refer to the Survey of Earned Doctorate (SED).

For the purpose of determining the highest graduate degree earned, projects are asked to provide the highest degree the student has attained as of the end of the reporting period. This does not, and has never, included specialist’s degrees, licensures, or certifications. Also, once a master’s degree has been attained, it is not necessary or advisable to change this response as doing so may impact data analysis. Furthermore, the goal of McNair is progression towards the doctorate, so multiple master’s degrees may not meet with the intent of McNair and may not be useful in measuring time to doctorate degree completion. With regards on how to report students who have earned a professional degree (e.g., JD) and have subsequently enrolled in a PhD program, the new reporting requirements discussed previously under “Reporting requirements related to creating a “single-year” file” will necessitate that all baccalaureate degree recipients records who are within certain established cohorts be retained on the file for a period of ten years regardless of whether the participant has attained a professional degree. This will then allow projects to update the highest graduate degree earned to the appropriate response. For example, in the case of a participant who earned a JD and subsequently earns a PhD and is in one of the required cohorts, the project will be required to retain the record on the file and will be allowed to change the response from JD to PhD.

**Action Taken:** The highest graduate degree has been modified as follows:

**Participant’s highest graduate degree earned to date, by the end of the academic year is:**

- 1 = Master’s Degree
- 2 = Doctor of Philosophy (Ph.D.)
- 3 = Doctor of Education (Ed.D)
- 4 = Other research intensive doctorate degree (e.g., D.Eng./D.E.SC/D.E.S, D.SC, Sc.D, DHSC, DNSc, DPH, DSW)
- 5 = Other non-research doctorate degree (e.g., DMA, DRec/DR, DSM, etc.)
- 6 = First-professional Degree (e.g., PsyD, Law, Medicine, Dentistry, Optometry, Veterinary medicine, Osteopathic medicine, Theology, etc.)
- 99 = Not applicable, no bachelor’s/no graduate degree earned
- 0 = Unknown

**NOTE:** Select the option that indicates the highest graduate degree obtained by the end of the academic year. Do not update this information in subsequent reporting period unless a new or more advanced degree has been earned. Select option 4 only if the doctorate degree was in a research-intensive program. If the participant has neither earned a bachelor or graduate degree, select option 99. If a participant for whom you are required to provide information earned a professional degree and subsequently earned a research-intensive doctorate degree, select the type of doctorate earned (i.e., option 2, 3, or 4). **Once the doctorate degree has been provided (i.e., option 2, 3, or 4), do not change the response in subsequent reporting periods.**

#### **Field 44: Date Highest Graduate Degree Earned**

**Comments:** Commenters stated that this field instructs projects to update it only when a new and more advanced degree is earned. However, there are no instructions for projects to update when a student earns a second master's degree since it is a new degree, but not a more advanced one.

**Discussion:** The Department acknowledges the commenters' concerns; however, the number of master's degrees a participant attains is not a measurement that is used to determine time to doctoral degree completion. Time to doctoral degree completion begins when the participant earns their baccalaureate degree and so information on multiple master's degrees is irrelevant when measuring program outcomes.

**Action Taken:** None

#### **Field 45: Institution Where PhD Was Earned**

**Comments:** One commenter asserted that this field provides no clear definition of a doctorate and requested clarification as to whether or not a PharmD, MD, JD, or MFA could be categorized as 999999. If not, they suggest that there should be a category for this field. Furthermore, the commenter requested clarification as to whether or not those who have completed at least a master's degree are to be coded as 999999. Another commenter inquired as to whether or not projects are to report in this field students who earn a PhD only, or any level doctoral degree (EdD or various other doctorates). Finally, one commenter suggested that the field be eliminated completely because they assert that this information is available through the Department's database systems.

**Discussion:** The purpose of this field is to develop profiles of institutions where McNair participants have been awarded a research-intensive doctorate in order to conduct comparative analysis on program outcomes as mandated by the statute. If the project indicated the student had earned a PhD, EdD, or other research intensive doctorate, then the project is to report the IPEDS ID where the doctorate was earned. Per APR instructions, if the participant earned a doctorate that was not research-intensive, then the appropriate response is "999999". Finally, the Department disagrees with the commenter's assertion that this information is readily available via the Department's databases. The Department does not collect the name of the institution where the doctorate degree was earned; therefore, this information is not available to the Department.

**Action Taken:** The field has been renamed "Institution Where Doctorate was Earned". In addition, option 999999 has been revised to include all participants who have not yet earned or did not earn a research intensive doctorate degree including those who earned a first professional. The NOTE below the field and the instructions have been revised as follows:

**NOTE:** If you selected option 2, 3, 4, or 5 in field 44, enter the six-digit postsecondary institution NCES IPEDS ID where the doctorate degree was earned. You can obtain the NCES

IPEDS ID from the following web site: <http://nces.ed.gov/globallocator/>. If you selected option 1 or 6, in field 44, enter 999999. If the student earned a doctorate and you do not know the institution where the doctorate was earned, enter “000000”. Once reported, you should not have to update in subsequent reporting periods.”

#### **Field 46: Doctorate Student’s Employment Activity**

**Comments:** Several commenters noted that this field imposes an extreme paperwork burden on project staff in an era of reduced funding. Other commenters noted that some students are employed under both teaching and research assistantships (50/50) and requested guidance as to how they should be coded. One commenter asserted that this field does not address the McNair objectives, therefore, should be deleted. In addition, a few other commenters stated that this field would require tracking students beyond the ten-year time frame to doctorate degree completion yet the information is readily available to the Department through the Survey of Earned Doctorates (SED). They emphasized that the SED captures employment information and provides a post-doctoral tracking longitudinal database coded by social security number. Thus, they maintain that the Department would have more direct access to confidential SED data to complete a greater variety of comparative studies, whereas McNair staff must request access to it which imposes an unnecessary burden and replicates federally funded reporting efforts. Another commenter suggested that the field name be changed to “Doctorate Recipient’s Employment Activity” to more accurately reflect the intent of the field. One commenter inquired as to whether or not “teaching” and “research” activity must occur at a university setting only, adding that some doctorate recipients may function in a research capacity in private industry.

**Discussion:** The purpose of McNair is the attainment of the doctorate degree in a research intensive program as well as in the fields related to teaching (PSE) and research. This field will allow the Department to examine the final employment outcomes of McNair participants who attain a research-intensive doctorate degree and will be used to conduct comparative analysis on program outcomes as mandated by the statute; therefore, the Department disagrees with the comment that states the field is not pertinent to the outcome criteria. The assertion that the Department can obtain this information through the Survey of Earned Doctorates (SED) is inaccurate because the Department does not have access to individual SED records. Because of privacy issues, the Department can only assess student outcomes using SED data at the program-level. Furthermore, it is the responsibility of the project to track students through doctorate degree completion. With regard to whether or not “teaching” and “research” activity must occur at a university setting only, a project may also report research conducted, for example, by a participant who is employed by the National Institutes of Health (NIH), Centers for Disease Control and Prevention (CDC), private industry, etc.

**Action Taken:** The Department has added an option (3 = Both Teaching and Research Activity) for McNair scholars whose employment involves both research and teaching. Also, per commenter’s suggestion, the field has been renamed “Doctorate Recipient’s Employment Activity”. Finally, the instructions have been revised to clarify that a teaching or research activity, although oftentimes will be at a university setting, it does not necessarily have to occur in this type of setting.

## **Additional General and Editorial Comments**

**Comments:** Several commenters requested that the Department identify and share with the projects the formula and fields that will be used to calculate prior experience points.

**Discussion:** Once the APR is approved, TRIO staff will develop a document similar to that used in the last competition (i.e., Appendix—Brief Summary of Policies and Procedures for Assessing Prior Experience (PE) points) that will contain all of relevant information regarding the calculation of PE. The Department will make every effort to share this information with the McNair community as soon as it becomes available.

**Action Taken:** None

### **PRIVACY ACT:**

**Comment:** One commenter noted the “PRIVACY ACT” located after field #46 contains a typographical in that participants are incorrectly listed under “Student Support Services program” instead of “Ronald E. McNair Postbaccalaureate Program.”

**Discussion:** Dually noted

**Action Taken:** Privacy Act statement has been revised as follows: delete the reference to Student Support Services and insert Ronald E. McNair Postbaccalaureate.