OMB Comments on Upward Bound Application
OMB 1840-0550

General:

1. I know there has been some concern about limiting cost/student served in some of the TRIO programs. There is no mention of this issue (that OMB sees) in this package. Is ED planning on addressing this issue through other means? Are there legal barriers to setting a maximum cost/student for grantees, or acknowledging this issue more generally in the Budget section on Page 77?

    Response: We do not intend to address the issue of cost/student served. We addressed this issue in the Upward Bound competition in 2002. At that time we discovered that the amount of grant funds awarded per student served varied widely among UB grantees. The low was about $3,400 per student and the high was over $10,000 per student. UB projects do not vary significantly in the types and quantity of services provided and no explanation could be found to justify the disparity. To resolve that inequity, we required grantees to increase the number of students served so that the amount of grant funds received averaged no more than $5,000 per student. (The national average at the time was about $4,600). We granted exceptions to grantees that demonstrated a compelling reason, such as unusually high costs because of special needs of the population served (such as disabled students).

    We referred your question relating to the Department's legal authority to the Office of General Counsel. The following is the response we received. "The Department has the legal authority to establish requirements for grantees to serve a certain number of students while taking into account the size of the grant. This authority may have the practical impact of creating a maximum cost per student for grantees."

Supporting Statement:

2. Please explain the .5 aspect for the expected 437.5 applicants; why does OPE expect half an application?

    Response: It is an error. The number should be 583.

3. How many fewer applications for regular UB does OPE expect as the result of the absolute priority (from the previous award cycle to this award cycle)?

    Response: We do not expect to receive fewer applications than we received during the previous award cycle.

4. The estimates appear to have costed out GS-13 staff at $30 per hour. Please see http://www.opm.gov/oca/06tables/html/dcb_h.asp. The hourly rates for a GS-13 in the Washington, DC, range from $37 to $48 per hour.

    Response: A correction has bee made. A new sheet will be faxed to you.

5. Please remove OMB review from the cost to the Federal government in item 14 of the supporting statement.

    Response: Done.

6. A total of $664,354 is for contractor logistical support for workshops, application processing, field reading, and slate preparation. How much money is for each of those activities?

    Response: We have revised the dollar amount noted above for contractor logistical support for the workshops, application processing, field reading, and slate preparation. The figure cited above is the total amount needed for contractor support for the FY 2007 TRIO grant competitions that include Upward Bound, Upward Bound Math-Science, Veterans Upward Bound, and the Ronald E. McNair (McNair) Postbaccalaureate Achievement Programs. Since a separate application package has been prepared for the McNair Program, the contractor costs associated with providing competition support for this competition should have been subtracted from the amount included in the Supporting Statement for the Upward Bound Application package. The revised amount is $520,000. We apologize for the error.

    The revised estimated total for contractor support for the FY 2007 Upward Bound competitions is approximately $520,000.

    Of this total, the estimated breakdown of costs by task is:

Project Management	$ 75,000
Pre-application workshops:	$ 55,000
Application processing:	$138,000
Logistical support for field reading:	
(Include honoraria processing fee, but does	
not include the field reader honoraria)	$150,000
Slate preparation	$102,000
	_____
Total	$520,000

7. OPE has estimated that the costs to the Federal government of conducting the peer review will be approximately $1.9 million. How much of that money will be program funds, and how much will be from S&E?

    Please break out the program funds for this review by fiscal year (i.e., how much will be from FY 2006 funds, and how much from FY 2007 funds?) How much of this money is considered to be for peer review, and how much for other administrative expenses?

Response: The statute authorizes the program to use up to one-half of one percent of the appropriation for administrative activities, including the review of applications. See section 402A (f) of the HEA. Of the $ 1,761,400 cost to the Federal government, only the contractor logistical support (estimated at $520,000) and the field reader costs (estimated at $577,500) are paid with program funds (estimated total of $1,097,500). All other costs (which are primarily staff time) are paid with S&E funds.

FY 2006 program funds are used to pay for the contractor and field reader honoraria for the FY 2007 UB competitions. The competition schedule requires work to begin on the competitions before congress passes the FY 2007 appropriation. Since the contractor is responsible for issuing the field reader honoraria, these funds are part of the approved contract awarded with FY 2006 funds.

Application package:
8. OPE is cutting the page limit from 100 pages to 50 pages. What is the reason for the reduction in page allowance? On what criteria did OPE determine that 50 pages was an appropriate page limit? Given the number of comments received, has OPE considered allowing more pages?

Response: We have reviewed many application packages from previous competitions. Frequently the same information is provided several times in difference sections of the application.   Many applicants have a tendency to "dust off" their previous successful applications and resubmit it. In addition, several pages are frequently used to provide the history of the applicant organization. Applications that are not concise and which provides extraneous data are very difficult for the readers to evaluate. As a result, the review process takes longer and is more expensive. The Assistant Secretary, OPE directed the programs to reduce the size of the applications as a way of streamlining the process and making the proposals more concise. OPE had a limit of 50 pages for the EOC program and the TRIO Training program competitions that were held this year.   There is no evidence that the proposals are of lesser quality as a result of the new page limit. We did consider the comments and decided to not increase the number of pages.

9. In response to the comments on the confusing statement re "outside evaluators," OPE has agreed to change the language. Please send us the language for the whole revised paragraph.

Response: All the agreed upon changes will be made and a new package sent to you.

10. (p. 61) ED endeavors to address an apparent gender disparity in UB, a laudable goal, with the following requirement: "The Department has determined that a disproportionate number of female students are being selected to participate in the regular Upward Bound Program and the Upward Bound Math and Science Program. Only one-third of all participants are male. To address this imbalance, applicants are requested to include in their GEPA statement strategies they plan to employ to

increase the number of male participants in the regular Upward Bound and Upward Bound Math and Science Programs."

However, increasing male participants at a grantee level is not the appropriate goal. Ensuring that the grantees' male students are proportionately represented is, at least, more closely aligned with the true goal of equalizing opportunity. Please rewrite this section to discuss ensuring proportional representation and removing any barriers to this goal.

Response: We agree. The change has been made.

11. (p. 77) Please consider direct references to the program-wide indicators in the "Evaluation Plan" section. Grantees should articulate their capacity/strategy to report on these critical indicators (even though they may track accomplishments after the grant expires).

Response: We have included a direct reference to the Performance Indicators in evaluation discussion. However, we did not ask grantees to "articulate their capacity/strategy to report on these critical indicators" in that section because the reporting is handles through the Annual Performance Reports which are also approved by OMB.

12. (p. 82) OPE has revised the language to address the commenters' concerns. We have additional edits for clarity:

- (a) Academic Improvement on Standardized Test: of all UB participants, who at the time of entrance into the project had an expected high school graduation date during the school year (i.e., seniors), will have achieved at the proficient level during high school on state assessments in reading/language arts and math.

- (c) Postsecondary Enrollment: % of all UB participants, who at the time of entrance into the project had an expected high school graduation date during the school year (i.e., seniors), will enroll in a program of postsecondary education by the fall term immediately following the expected graduation date from high school.

Response: No change is made. The proposed parenthetical language is not correct. The students we are measuring are the students "who at the time of entrance into the project had an expected high school graduation date during the school year. It is not just seniors, its any students who should have been seniors based upon normal progression from the time they entered the UB project. For example, for students who enter the project at the beginning of the 9th grade in 2007, their expected high school graduation will be 2011. For students who enter the project at the beginning of the 10th grade in 2007, their expected high school graduation will also be 2011. So, if the school year for which the objective is measured is 2011, all students who were served by the UB project and were "expected to graduate in 2011 will be included in group of students from which we determine the number that achieved the objective. We decided upon this approach so that all students who receive UB services are tracked and accounted for instead of only those who become seniors.

This approach gives us a much better measurement of how successful the project is with its students because it counts the students who drop out of school or who drop out of the UB project.