

Summary of Comments received on the Upward Bound Application and Responses

An analysis of the comments and of any changes in the application requirements follows. We did not address comments on the proposed priority that were included with comments on the application package. Comments on the proposed priority will be evaluated and a response prepared as part of the development of the final priority.

1. Comment:

Several commenters objected to the limit of 50 pages for the Upward Bound application.

Discussion: No change is made.

Shorter applications require applicants to focus on the most important aspects of their projects and describe in a concise manner for the readers the applicants' responses to the selection criteria. We believe 50 double-spaced pages are sufficient to write a competitive application.

Applicants were able to prepare competitive proposals in the recently competed Educational Opportunity Centers Programs with a 50 page double-spaced limit.

2. Comment:

Several commenters suggested that the statement "that an outside evaluator is not required" is contradictory to the statement that "the applicant should identify and state the qualifications for an individual or organization to serve as the evaluator for the project."

Discussion: A change was made.

The statement that "an applicant should identify and state the qualifications for an individual or organization to serve as the evaluator for the project," is confusing when read with the statement that "an outside evaluator is not required." The revised statement reads "it is not necessary to obtain an evaluator who is not employed by the host organization; however, the proposed evaluator may not be employed by a TRIO project within the host organization."

3. Comment:

Some commenters stated that language in the standardized objectives is confusing. They believe the use of the term "current and prior year participants" is ambiguous, and if

the Department means "seniors" when stating "all UB participants with an expected high school graduation date during the school year, then it would be revised to state "seniors."

Discussion: A change was made.

These comments apply to objectives (a) and (c) of the UB and UBMS projects.

The term "current and prior year participants" was used to emphasize that the participants being measured are all participants who at the time of entry into the project (not just those who remained in the project) had an expected high school graduation date during the current school year. The language "all UB participants with an expected high school graduation date during the school year" does not apply only to seniors still participating in UB. The language includes all Upward Bound participants who at the time of entry into the UB project were expected to graduate in the current school year. This number includes participants no longer participating in the UB project as well as participants still being served by UB.

The objectives have been revised to read as follows:

(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, 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, will enroll in a program of postsecondary education by the fall term immediately following the expected graduation date from high school.

4. Comment:

Some commenters stated that some graduating seniors delay entrance into postsecondary institutions until the Spring semester following high school graduation and the standardized objective should be changed to count those students.

Discussion: No change is made.

The purpose of the standardized objectives is not to identify every Upward Bound graduating senior who eventually enrolls in postsecondary education. We recognize that students often delay entrance into postsecondary for a

variety of reasons. The annual performance reports will capture the educational activities of those students. The standardized objectives will be used to award prior experience points and if an applicant can demonstrate that a certain percentage of graduating seniors delay entrance into postsecondary institutions the applicant should take that data into consideration in setting the percent at which it proposes to accomplish the objective.

Comment:

One commenter stated that the standardized objectives for the VUB Program do not track the prior experience criteria in the regulations. For example, the regulatory criteria for prior experience talks about remaining enrolled in the project until secondary school completion.

Discussion: No change is made.

The regulatory prior experience criteria for the Upward Bound Program are written primarily for participants who are enrolled in secondary school. VUB participants are adults who are not enrolled in secondary school so the Department has adjusted the language of the prior experience objectives to accommodate the uniqueness of the VUB projects. For example, the regulatory criteria reads "the extent to which project participants continue to participate in the Upward Bound Program until they complete their secondary school program." Because VUB participants are not in secondary school, this objective was amended to read as follows: " _____ % of participants served by the project during each budget period will remain enrolled or complete their prescribed VUB educational program." Emphasis added. To require VUB projects to use the regulatory objective as written would place VUB projects at a disadvantage since they would not be able to earn any prior experience points for this objective, because they do not serve participants in secondary schools.

Comment:

One commenter states that since the Department has developed the "standardized objectives it would be helpful if it were explicitly stated that the applicant does not need to address (discuss) the criteria of whether the objectives "include both process and outcome objectives" or "address the needs of the target population."

Discussion: A change was made.

An applicant is not required to discuss or explain that the objectives are both process and outcome objectives. As

specified in the application package the "Objectives" selection criterion is worth eight points and all eight points will be assigned based upon the extent to which the applicant's proposed percentages are ambitious but attainable, taking into consideration 1) the need identified by the applicant, 2) the plan of operation proposed by the applicant, and 3) the project budget and other resources available to the applicant.

Comment:

One commenter asked if the UB Initiative funds will be combined with the base award amount.

Discussion: A change was made.

The Closing date notice has been modified to articulate the treatment of the UB Initiative funds. Specifically, projects that have the Initiative funds will be allowed to include 50 percent of the Initiative funds in their base amount and apply for 103 percent of the combined amount.

Comment:

One commenter indicated that, as written, the applications must be written in "one" of four specified fonts. The applicant recommends a change to allow applications to be written in "one or more" of the specified fonts. The commenter argues that changes in the font can make the document more readable.

Discussion: A change was made.

Applicants may use one or a combination of the specified fonts.