

“OMB has the following questions about collection # 1840-0125. Would you please provide the Department's written responses by COB Friday, March 21 (or let us know by then if you need more time)? The page numbers below refer to the application document.”

**1. “Why and under what authority did ED limit the applications that an organization can submit to only one application per priority? (p.15)”**

TRIO's Response: Section 402A(c)(5) of the HEA prohibits the Secretary from limiting the number of applications submitted by an entity under any of the TRIO programs "if the additional applications describe programs serving different populations or campuses." The TRIO Training Program only has one target population -- TRIO program staff and the training sessions are not campus limited. Accordingly, a grantee would not be submitting "additional applications serving different populations or campuses" and this restriction on the Secretary's discretion does not apply.

Based on our past experience and the authorizing statute, we elected to limit applicants to one application per priority in FY 2006. We found the limitation worked well, and we plan to continue to use it in FY 2008.

*Note:* This is the same limitation approved by OMB for use in the FY 2006 competition.

**2. “How were the absolute priorities determined?”**

TRIO's Response: As we explain in the FR Notice, the priorities are from the authorizing statute, section 402G(b) of the Higher Education Act (HEA) and the program regulations, 34 CFR 642.34. (See also 34 CFR 642.10.)

In accordance with the authorizing statute, section 402G(c) of the HEA, and the program regulations, 34 CFR 642.34(a), the TRIO Office discussed training needs with TRIO grantees and representatives of regional and national associations when developing the absolute priorities for FY 2008. In an effort to provide both streamlined and comprehensive training for TRIO project personnel, we developed four absolute priorities that include two or more of the regulatory priorities.

*Note:* These are the same absolute priorities as those approved by OMB for use in the FY 2006 competition.

**3. “How did OPE determine that 325 people should be the minimum number of people trained under each absolute priority, since not all of the priorities have the same maximum award amount or number of expected awardees?**

***Can each priority have a minimum number of personnel served that reflects the need of that priority? (p.14-15)”***

TRIO’s Response: Since putting the application into clearance, we have made the decision to lower the required minimum number of people trained to 290 participants.

We determined the maximum award per priority based on our estimate of the costs to the grantee. Training under priorities #1 and #3 will require the use of computers and special computer programs to demonstrate proper record keeping, and illustrate how grantees create and file reports, as well as to train participants in how to use technology to best serve their projects. Training under priorities #2 and #4 should not require the same expenses to the grantee. Therefore, we believe that the same minimum number of participants required for all four priorities is reasonable.

*Note:* OMB approved this same requirement for use in the FY 2006 competition.

**4. “How will the program office determine that the training projects will serve all regions of the country?**

***The application does not discuss how the work performed under the same priority by different grantees will not overlap or be duplicative? Will OPE coordinate the training efforts between the grantees under each absolute priority? If so, how? (p.17)”***

TRIO’s Response: The program regulations, 34 CFR 642.33, require that “The Secretary, to the greatest extent possible, award grants for Training Program projects that will be carried out in all of the regions of the Nation in order to assure accessibility to prospective training participants. “

The field readers will use the regulatory selection criteria, 34 CFR 642.31, to review and score applicants’ proposals to serve participants. In addition, the application includes a section titled “*Expectations for Successful Applicants*” which specifies that grantees must meet with TRIO Office staff and must coordinate trainings through the TRIO Office – to ensure that training projects will serve all regions of the country.

Based on the FR Notice language and the program regulations, in addition to past experience, we expect that applicants will include in their proposals for funding, a plan for nation-wide training as part of the “plan of operation” section of the application.

*Note:* OMB approved this same language for use in the FY 2006 competition

- 5. “Absolute priorities 1 and 3 provide training on “model TRIO projects”. How will OPE determine that the proposed trainings are based on model TRIO projects? What criteria will be used to determine the model projects? (p.33-35)”**

TRIO’s Response: The program regulations require training on “the design and operation of model programs for projects funded under the Federal TRIO programs”, 34 CFR 642.34(a)(21) and (b); see also 34 CFR 642.10(c). The field readers will use the program’s regulatory selection criteria, 34 CFR 642.31, to review and score an applicant’s proposal to provide training on “model TRIO projects.”

*Note:* OMB approved the use of this language and process in the FY 2006 competition.

- 6. OPE proposes two performance measures under the training program for the federal TRIO programs. First, the program will measure the cost effectiveness, based on the percentage of TRIO personnel receiving the training each year. The second measure will determine the percentage of those receiving training who rate the training as highly useful. Has OPE considered any other performance measures? The proposed performance measures do not effectively determine the quality or utility of these training programs. We recognize that these are small grants and evaluation dollars are limited but the performance measures should focus on the quality of the training provided to TRIO personnel by absolute priority and the utility of the training on improving the performance of TRIO personnel.**

TRIO’s Response: TRIO has not considered other performance measures, to date. To our knowledge, this is the first time the issue has been raised. We are eager to work with OPE’s Strategic Planning Staff and OMB to develop additional performance measures for use in the FY 2010 competition.