

I submit the following comments for consideration regarding review of (03583) 1840-0113-v.3 Application for Strengthening Historically Black Colleges and Universities Program and Historically Black Graduate Institutions (JH).

The opportunity for input from Title III Administrators in the development process of the revised Application for the HBCU & HBGI Programs & CCRAA would have been helpful to the Department and Institutions; the purpose, content, and application for CCRAA & Title III Programs in the way they are "combined" is too confusing for institutional administrative & business operations; instructions are not clear; the programs are not the same (separate authorizing legislation) but seemingly implemented the same by the Department. For example:

- o LAA categories - HBCU - 12 + other
- o LAA categories - HBGI - 7 + other
- o LAA Categories - CCRAA - 5 + other (7 allowable LAA categories are not allowable using this funding source)
- o Application for Grants Under HBCU & HBGI Institutions

**RESPONSE:** Through various methods of communication (meetings, phone calls, and emails) with individual grantees and the National Association of Title III Administrators, as well as the official notice published in the Federal Register for public comment, the Department has shared with the HBCU community its plans to and the need to revise the application booklet for Title III, Part B programs. When we made the decision to allow the package to expire in order to make changes, we did not know at that time of the impending additional \$85 million in funding authorized by the College Cost Reduction and Access Act (CCRAA). Because the CCRAA mandated that awards be made in 2008, we had very little turn around time and because the CCRAA specifically states that these funds are in addition to the regular Title III, Part B funding and the fact that the regular application package had to go through OMB approval, the Department decided to include the CCRAA application process in the regular HBCU application package. Do note that because CCRAA

funding is for two years only, that portion of the approved application may be removed during the years it is not applicable. In addition, the same application processes and methods of funding (discretionary funding based on a mandated formula) will be used for both funding programs, it was feasible to include CCRAA with the HBCU application.

As for the legislative allowable activities, they are the same for regular HBCU and HBGI applicants (a total of 12 each, see CFR 34 Part 34, Sections 608.10 and 609.10, respectively [the most recent authority]). The CCRAA defines which of the 12 HBCU allowable activities are permitted under the HBCU appropriation. The differences have been clearly defined in the application booklet. For FY 2008, HBCUs and HBGIs will submit Phase I Formula Data for non-competing continuation funding. The exact same data will be used to calculate the FY 2008 CCRAA funding. NOTE: This is a requirement for HBCUs only. This process lessens the paperwork requirement and the burden hours required of the Department as well as the applicants.

Evaluation Process - What will be evaluated? Criteria used to evaluate substantive progress for Title III funded activities are not applicable for the purpose of the Strengthening Institutions Title III Program.

**RESPONSE:** Evaluation for the purpose of assessing program outcomes was developed with input from the National Association of Title III Administrators and the Department of Education Office of Strategic Planning to address PART and GPRA. These measures are similar to those of all Title III Programs and responds directly to data already collected or provided by the grantees themselves as reported to IPEDS. Substantial progress is determined by the evaluation of the grantee's response to information collected in the annual and final performance reports. Note that the annual and final performance reports are being redesigned to reflect the concerns of the grantees.

- o How will CCRAA outcomes be measured? Will Title III Programs HBCU, HBGI & CCRAA outcomes somehow be combined and then measured?

**RESPONSE:** No, while the measures are similar the duration of the projects vary (5-years versus 2-years) and will be treated separately according to several factors, mostly in response to the proposed allowable activities to be carried out by each project. Do note also that a strong evaluation plan is encouraged and will be emphasized throughout the processes (application packages, pre-application technical assistance workshops, project directors workshops, and the collection of data for the purposes of evaluation substantial progress).

Caliber - Application Submittal - Title III HBCU, HBGI, and CCRAA applications using a web based program

Title III is one of the most important funding sources for HBCU'S, therefore, formalized hands-on training must be provided

**Communication** - clear, concise, instructions, due dates, and application processes must be openly communicated with HBCU institutions, including Presidents & Title III Administrators

**RESPONSE:** The Department will announce its plans to conduct five (5) pre-application technical assistance workshops in several national locations for all eligible HBCU and HBGI applicants, as well as all other programs making new awards in 2008. An agenda is being prepared that will provide in-depth, program specific guidance to all those attending. There is no cost to the applicants associated with attending these workshops.

**NOTE:** For FY 2008 Phase I data will continue to be collected as in the past. Phase II, The Project Plan (only required for CCRAA funding) will be collected electronically using a Web based program to be collected by our contractor, Caliber. As public awareness of electronic communications and Internet usage increases, demand for on-line interactions with Federal agencies also increases. Moving to electronic transactions and electronic signatures can reduce transaction costs for the agency and its partners. Transactions are quicker and information access can be more easily tailored to the

specific questions that need to be answered. As a result data access, retention and analysis is easier.

Thank you for the opportunity to submit comments.

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