

## **Response to Perry L. Herrington**

This is in response to Perry L. Herrington, President of the HBCU Title III Administrators, March 28, 2008 comment regarding the 1840-0113-v.3 Application for Strengthening Historically Black Colleges and Universities Program and Historically Black Graduate Institutions pending OMB approval. The revised application is designed to improve and streamline the grant application process. To date, the Title III B application has been submitted in hard copy format. The new application proposes to collect Phase II data electronically via a web-based tool. This is in an effort to decrease the burden hours for both the Department of Education staff and the applicants.

There are no proposed changes to the performance measures previously applied to the Title III B programs. The stated objectives are the same as those posted on the Department's website. However, to assist grantees we have included these measures in the application, as they were not previously integrated within it. The Department has had several meetings with the HBCU Title III Administrators to discuss Government Performance and Results Act (GPRA) and Program Assessment Rating Tool (PART) measuring tools and will continue to do so. The enrollment, persistence, and graduation performance measures were developed in 2005, when the PART review determined that the previous HBCU program measures were not optimal for assessing performance. The data for the new measures were already being reported to the Department annually by program grantees. Additionally, the measures were aligned with the program's purpose and the Department's Strategic Plan, and they met the PART standard for evaluating "outcomes". In addition, the Department is also in process of redesigning the Annual Performance Report (APR) for all IDUES' Programs.

The application submitted for OMB approval does incorporate a request for funding for College Cost Reduction and Access Act of 2007 (CCRAA) HBCU additional funding. For FY 2008 only, those eligible HBCUS will be required to submit Phase 2 application for funding under CCRAA HBCU program. All others (HBCU and HBGI) grantees are required to submit Phase I formula data only for non-competing continuation funding. The legislative allowable activities (LAAs) under CCRAA HBCU differ from the LAA's under Title III B program because of legislative authority: [http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110\\_cong\\_reports&docid=f:hr317.110.pdf](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_reports&docid=f:hr317.110.pdf). There was not enough time to make significant changes to LAA's or performance measures under this program without going through negotiated rule making.