HSI response to Public Comments sent directly to OMB re: the Application for Grants under the Promoting Postbaccalaureate Opportunities for Hispanic Americans (PPOHA) Program

Comments	Responses
1. The first comment recommended a change to the HSI Program Profile Form by changing the data requested in box (8c) from IPEDS FTE to IPEDS Headcount data.	<ol> <li>In response to a 2005 Inspector General (IG) investigation on the HSI program regarding several institutions who did not meet the 25% Hispanic FTE requirement based on the self reported data, the Title V office, along with our Program Attorney, decided that the best way to verify enrollment and meet the concerns of the IG was to use the most readily available and accurate data.</li> <li>Unfortunately, we cannot make changes to the current program profile form because of the current established procedures in place.</li> <li>However, under the HEOA reauthorization, we now have the opportunity to make changes to the program regulations. The Title V office will take into consideration your concerns and recommendations during this process.</li> <li>We appreciate your concerns and continued interest in the Title V Hispanic-Serving Institution program.</li> <li>Sincerely,</li> <li>Title V, Hispanic-Serving Institutions Program Office</li> </ol>
2. A second comment included four parts and was in reference to the application guidelines, pre-application workshops, and approved activities.	2.
a)Does the department plan to offer pre-proposal workshops where more detailed information about the program/guidelines will be shared with prospective applicants? If so, could you please put us on the list of people to receive announcements about the dates/locations where these would be held?	a) The Department does plan to hold several pre- application workshops, most likely in June, and information on the workshops will be posted to our website as well as our contractor's website. We do not maintain a separate list of institutions.

b)Would funds from the program be permitted to be used to develop a new master's degree?	b) After seeking clarification with our Program Attorney on this question, our reading of the legislation is that the intention of the legislation regarding "expanding postbaccalaureate certificate and postbaccalaureate degree offerings is to support existing programs.
c) Section 5.13 # 4 in the draft guidelines indicate support for low-income students will be permitted. Will student support extend to other types of student support such research, travel to conferences, stipends, assistantships, etc.? If this support is limited to low income students will the definition of low income be the same as used for TRIO programs?	c) Student support will be extended to the types of student support you have mentioned on a case by case basis. We are still writing the regulations for this program and will need to review each budget carefully. The definition of low income will not be the same as TRIO programs since most of their programs are at the baccalaureate level. Instead, we are considering using the Free Application for Federal Student Aid (FAFSA) form which most students complete each January. In addition, selection of students will include merit.
d) On P. 17, note 3 "Endowment" is listed however on P. 34, under authorized activities, Endowment is not listed as an authorized activities. We're wondering, will endowment be listed as an allowable component in the final guidelines?	d) As I mentioned in a previous e-mail to you on this question, "endowment" is not an authorized activity, per se, however, we <u>had</u> considered allowing endowments under #8 "Other activities proposed in the application submitted pursuant to section 514." Given that this is a new program, we decided against that activity at this time.
3. The third comment was in reference to application guidelines and submission dates.	3. At this time we are looking at the first week of June for publication in the Federal Register with a 30 day turnaround. The application is currently open for public comment until the end of this month in the Federal Register Notice/Vol.74, No. 60/Tuesday, March 31, 2009. Also, while "endowment" is mentioned, it is not one of the legislatively authorized activities and will not be offered.
4. The fourth comment included four parts and was in reference to allowable activities, application guidelines, student support, and pre- application workshops.	4.
a. Is the development of a new graduate program among allowable activities? (P. 34 of the Guidelines shows "curriculum development" buried in (5) Support of faculty exchanges etc. We want to make sure that the Dept of Education will support the development of entire programs and that they tell the	a. No, after seeking clarification with our Program Attorney on this question, our reading of the legislation is that the intention of the legislation regarding "expanding postbaccalaureate certificate and postbaccalaureate degree offerings is to support existing programs.

<ul> <li>proposal readers that too.)</li> <li>b) Is applying for separate grants to develop separate programs (such as those I listed above) advised, and if so would they be in competition with each other?</li> <li>c) What percentage of grant funds does the Department of Education recommend be budgeted for student financial aid?</li> </ul>	<ul> <li>b) As I mentioned in question #1, PPOHA funds will support existing programs. In addition, only one PPOHA grant will be awarded to each institution; consequently, you would be in competition with each other.</li> <li>c) Given that this is the first year of the competition, and we are still writing the regulations, we are leaving the percentage for student financial aid up to each institution, however, we will review each budget on a case by case basis in order to ensure that</li> </ul>
d) When and where will the Department of Education be holding Technical Assistance workshops for potential applicants?	institutions are not using PPOHA funds primarily for student financial aid. d) The Department plans to hold several workshops in Washington, DC in June with the possibly of including a Webinar.