Upward Bound Math & Science Program – 2012 Competition
Summary of Public Comments with Responses

INTRODUCTION

The Department of Education (Department) received 21 comments from individuals in the following categories, some of which commented on several topics: Individuals representing Upward Bound Math & Science (UBMS), staff persons at institutions of higher education (IHE), higher education associations, the Council for Opportunity in Education (COE), and project directors of other Federal TRIO Programs. The commenters addressed five broad areas with the majority of comments expressing concern regarding the funding strategy. Additional areas of concern to the commenters were the competitive preference priorities: 1. Turning Around Persistently Lowest- Achieving Schools; 2. Enabling More Data-Based Decision –Making; and 3. Improving Productivity, as well as, the performance measures and new data elements. A few commenters requested clarification on some of the standardized objectives. We also received a number of miscellaneous comments, which suggest the need for clarification on several issues (e.g., deadline for UBMS, clarification on some of the criteria in the Need section, data for UBMS participants, a decrease in the level of consideration given to prior experience points for currently funded applicants, and clarification on the issue of staff not being able to work on writing a grant during operational hours).

Below is a summary of the comments and the Department's responses to the comments including whether subsequent changes have been made to the Notice Inviting Applications and the application package for new awards for fiscal year (FY) 2012.

FUNDING (MAXIMUM AWARD BASED ON A COST PER PARTICIPANT)

Comments: The majority of the commenters expressed concern about the cost per participant and highlighted the challenges for existing grantees to receive an award larger than that awarded in fiscal year (FY) 2007, if their current per participant cost exceeds $4,200. These commenters believe that the lower per-participant costs will have a detrimental effect on the UBMS program and recommend that the Department reconsider the proposed funding tiers. Many of the commenters expressed that the proposed per participant cost would significantly reduce project outcomes, such as high school graduation, postsecondary entry, persistence and completion and the summer component would be affected by reducing the number of students the projects would serve during the summer. Several commenters emphasized that the costs associated with preparing high school students for postsecondary education programs leading to Science, Technology, Engineering, and Mathematics (STEM) careers, exceed the cost for operating a Regular Upward Bound project. They argue that implementing the proposed cost per participant

would produce fewer students who are adequately prepared to enter and complete postsecondary programs leading to careers in STEM.

The commenters stated that projects have already experienced reductions in recent years as a result of level funding which resulted in reducing services to the students. They further noted that the only way projects would be able to meet the reduced per participant cost would be through the elimination of critical components of the UBMS program, which would affect their eligibility for funding consideration.

The commenters highlighted the following as measures they would have to take to bring the cost per participant down:

- Reduction in the number and/or quality of services provided (e.g., reduction in tutoring services, reduction or elimination of college tours, elimination or reduction in cultural activities, etc.);

- Limited access to laboratories and computer facilities that the UBMS programs would be able to offer to its participants;

- Reduction in the number of participants who can receive services during the summer component and the length of time and type of summer component (less than six-weeks, residential to non-residential);

- Elimination of staff positions, reduction in staff time, reduction in professional development, reduction in compensation, insufficient funds to hire qualified individuals and an increase in job responsibilities; and

- Rising transportation costs could prevent students from receiving adequate services, which would adversely impact the quality, frequency and type of services that could be provided by projects serving rural areas.

Response: The Department believes that the UBMS program, like the other Federal TRIO Programs that provide services to high school students and adults, is crucial for getting more students into higher education ready to succeed and contribute to the Administration's 2020 college attainment goal. In addition, while the Secretary is sensitive to the adjustments that projects may need to make in terms of service delivery, we are now living within a *new normal* in education. As such, it is crucial for us to pursue strategies that encourage greater levels of productivity and innovation to deliver high-quality services to an increasing number of students. The Department understands that UBMS focuses on promoting STEM education; however, the funding strategies outlined were not constructed to be punitive but rather to create a grant award structure that would create incentives for grantees to pursue more productive strategies and

would ultimately result in more students receiving access to the important services provided by UBMS projects.

As noted, the 2012 competition introduces a three-tiered funding structure that rewards current grantees and new applicants that can pursue productivity, but leaves room for those that cannot continue to participate in the program. Maximum grant awards only determine budget level; they do not impact applicants' scores. Furthermore, the three funding tiers are based on the new costs per participant developed for applicants for the FY 2012 competition, not the existing cost per participant of current grantees. Current grantees thus have an opportunity to adjust their number of participants and therefore would not be penalized for their current costs.

     Note: We will provide examples in the Frequently Asked Questions to explain and clarify how the three funding tiers work to assist applicants in determining which tier would work best for them.

We feel that it is important to note that the Department also looked for connections between cost per participant and grantee characteristics, such as their level of urbanicity, whether the grantee was serving persistently lowest-achieving schools, and the number of schools served. We also looked at whether there were any connections between cost per participant and the grantee's success in getting students to enter postsecondary education.

We saw no statistically significant difference between the cost per participant for grantees based upon whether they predominantly served urban or rural schools; whether they served any of the persistently lowest-achieving schools; or whether they had higher or lower student enrollment rates in postsecondary education.

Change: None

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COMPETITIVE PREFERENCE PRIORITIES

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General Concerns:

There were several general comments regarding the competitive preference priorities. One commenter stated that the competitive preference priorities are not realistic or reasonable given that the Department is proposing to reduce grantees' budgets. Another commenter suggested the Department drop the lowest score of the Competitive Preference Priorities (CPPs) for applicants who address all three in order to level the playing field for applicants. Another commenter stated that if there can only be ten points awarded under the competitive preference priorities, it should be based on responses to CPPs 2 and 3 only. This commenter contests that there is ample opportunity within the selection criteria for all applicants to provide data in support of their target schools' high need for service. One commenter stated that there is no guidance provided by the Department as to how improvements in student achievement and outcomes will be

measured. Another commenter suggested that the Department should provide criteria delineating what would constitute awarding all five points, some points or no points at all.

Competitive Preference Priority 1 (CPP1): **Turning Around Persistently Lowest-Achieving (PLA) Schools.**

One commenter believed that without additional funding, it is unclear how the Department expects grantees to both support students at these schools and to increase the number of students who graduate having completed a rigorous program of study. The commenter stated that CPP1 implies that the applicant should have a plan for impacting the school as a whole and not the students it proposes to serve at the PLA schools. Several commenters expressed that it is unfair to expect UBMS projects to turn around low performing schools, when even State and Federal departments of education struggle with this task.

Several commenters have expressed concerns that States that have fewer PLA schools would be at a big disadvantage compared to those that have several. Thus, a State with many PLA schools would have a greater chance of earning the additional competitive preference points. One commenter suggested eliminating CPP1 because it seems to favor or discriminate against certain geographical regions.

One commenter stated that CPP1 is not aligned with the purpose of the UBMS program and restricts the competitiveness of programs, current or potential. Another commenter stated that the list of persistently lowest-achieving schools for CPP1 is not relevant to the UBMS program. The commenter also stated that when addressing this priority, applicants would not have a sufficient applicant pool to recruit and select a sufficiently high number of interested students in math and science disciplines. Eliminating this priority would increase the likelihood that the overall competition best represents the purpose of the UBMS program. This commenter suggested including the list of 2010-2011 year Tier 1 and Tier 2 schools.

One commenter noted that the priority needs to be reconsidered or expanded to include more in the definition allowed within the application for identifying a "low performing school." This commenter believed that the current definition seems to be specific to what States have already established and that all States do not use the same benchmarks and/or criteria. The commenter also emphasized that a dramatic turn around of the lowest-achieving populations at the school is contradictory to the nature of the UBMS Programs.

One commenter noted that the priority discriminates against applicants from Guam, the Northern Marianas Islands, the Trust Territory of the Pacific Islands, the Federated States of Micronesia, and the Republic of the Marshall Islands, the Republic of Palau, the Virgin Islands, and Puerto

Rico. The commenter noted that applicants in these locations may not compete for this priority because the Department has excluded their persistently lowest-achieving schools from the list.

Response: One of the main purposes of this priority is to help students who are enrolled in PLA schools excel to graduate from high school and pursue a degree in postsecondary education. The Department does not expect projects to change the entire school; however, by identifying students in these schools, UBMS projects are giving students a better chance to persist from one grade to the next and likely be ready for college when they graduate from high school. These students would also enroll in postsecondary education to pursue a career in math or science.

The Secretary's intention is not to disadvantage any applicant. Although there are three competitive priorities each worth up to five points, the Department decided that the maximum points any applicant could receive under the CPPs is 10 points. Therefore, an applicant that is unable or does not propose to serve a PLA school could still earn the maximum number of priority points (10) by successfully addressing the other two competitive priorities.

To ensure consistency in the definition of PLA across all of the Department-funded grant programs, the definition used by the School Improvement Grant program authorized under section 1002(g) of the ESEA, will be used for this competition.

Change: None

Competitive Preference Priority 2 (CPP2): **Enabling More Data-Based Decision-Making.**

Comments: Several commenters expressed concern that the priority is an unmanageable burden because of the lack of resources that will be provided by the Department, in order to meet this priority. Projects would have to rely on existing staff positions to take on the added responsibilities of data collection and analysis, which means that less time will be focused on providing services to participants.

Also, commenters noted that in some States there is not an alternative to obtaining data, other than the National Clearinghouse, and that there are no state longitudinal systems. Additionally, another commenter indicated that in the State of California, gathering data from State longitudinal data systems or other high-quality third-party data systems is not a realistic expectation of any UBMS project in California. The commenter further stated that data on postsecondary enrollment, course taking, persistence and completion are either incomplete or nonexistent in California. Using a third-party data system, or the institution, would increase budget expenditures and decrease funds available for direct student services. This commenter recommended that the Department should fund projects at $1,331 per student, which would be used to collect and analyze data.

One commenter noted that this priority lacked clarity on student outcomes and improvements and that this priority appears to be duplicative of CPP 3, where programs should "increase efficiency in the use of resources."

Response: The Department does not agree that this is an unmanageable burden on projects. The intent of this priority is to help projects better serve the needs of participating students and increase the odds that they will pursue and succeed in postsecondary education. Data from State longitudinal systems or other reliable third-party sources will provide valuable information, which will assist projects in serving students more efficiently and assist in making effective adjustments within the project. The data will also assist projects in reporting outcomes to the Department. The priority states that the data may be obtained from State longitudinal systems or other reliable third-party sources. A third-party source can be a reliable data source outside of the project, thus not limiting the data source only to state longitudinal systems.

Change: None

<u>Competitive Preference Priority 3 (CPP3):</u> Improving Productivity.

<u>Comment</u>: One commenter indicated that they are currently implementing productivity-improving strategies but emphasizes that the uniqueness of UBMS is the human interaction needed to educate, counsel, and motivate disadvantaged youth, which the commenter states is not effective by way of technology. The commenter stated that technology has its advantages, but cost-efficiency should never be confused with cost effectiveness.

<u>Response:</u> The Department is encouraged to learn that projects are currently implementing many of the competitive preference priorities and as indicated in the Notice, the Department suggests technology as a strategy for CPP3. Human interaction with UBMS participants is expected; however; with the increased use of technology in all facets of society and the need for projects to be more effective and efficient, the Department believes that improvement strategies coupled with human interaction can be an added asset to project delivery.

<u>Change</u>: None

PERFORMANCE MEASURES AND DATA ELEMENTS

The Department developed eight performance measures to track the progress of UBMS projects toward achieving program success. Many of the comments received provided general concerns on the performance measures overall; however, there were several comments addressing the performance measures specifically.

General Comments:

Several commenters noted that collecting the data for the performance measures would require a lot of time and effort, which should be compensated at a level that will ensure accuracy and timeliness. These commenters also noted that many postsecondary institutions will only provide the additional requested information at a fee per student record. To address this requirement, projects will have to cut valuable services in other areas.

Additionally, another commenter indicated that the data for the performance measures would be difficult and almost impossible to collect without additional resources and feels that the Department would have more success in collecting the data directly from postsecondary institutions instead of placing the data collection burden on UBMS projects.

One commenter raised several concerns regarding the performance measures: What are the benchmarks for success? Will the Department set a standard for each of these performance measurements? What will be the "ideal" percentage that we are supposed to working towards? What is the "ideal" cost per participant? How will these additional measurements affect individual programs if they fail to meet this unknown benchmark? If the program fails to meet a benchmark, will that affect future funding as these performance measurements are not located in the legislation or regulations governing project funding. Are these additional performance measurements being used to evaluate programs or to gather short and long-term information on our student populations and student groups? This commenter further indicated that the additional collection of whether students did or did not need "remedial courses," and the type of degree a student attained is "fraught with accuracy issues."

Several commenters indicated that the performance measures on page 133 do not match what is on pages 50 and 51. One of these commenters also stated that performance measures #4 and #5 seem contradictory for #4 and #5. This commenter and also stated that on page 132, seven performance measures were listed and one appears to have been omitted when compared to page 50, which lists eight performance measures. Additionally, another commenter stated that performance measures #4 and #5 are not clear because there seems to be a contradiction where one measures attainment of a bachelor's in four years and the other measures attainment of a bachelor's in six years. Also the commenter indicated that one measure states "former UBMS

students" and the other states "UBMS participants." The commenter suggested that the language needs to be clearer so projects understand what the expectations will be.

One commenter believed that performance measures #4 and #5 will hamper the likelihood for success of UBMS projects because only the best-prepared students finish the baccalaureate in four years, and the need for low-income students to work while going to school is a practical reason for a longer timeframe for completion. Additionally, the commenter believes that science and engineering programs typically take students longer to complete than other programs because subject rigor often requires students from low-achieving schools to retake courses such as calculus and organic chemistry. The commenter stated that both performance measures #4 and #5 use the attainment of either an associate's or a bachelor's degree to define successful completion of a postsecondary program; which he believes runs counter to the purpose of the Upward Bound program as given in 34 CFR 645.1(a), the description of the UBMS Program as given in 34 CFR 645.10(b), and the outcome criteria of the Upward Bound Program as provided in U.S.C. 1070-11a(f)(3)(B). The commenter also believes that as a consequence of implementing these performance measures, many UBMS projects will have lower percentages of success. The commenter suggested omitting performance measure #4 since performance measure #5 is more aligned with the expectations of the UBMS Program.

Response: Because the success of the UBMS Program is measured by the percentage of participants who enroll in and complete postsecondary education, the Department does not foresee an additional burden to collect the data for the performance measures since much of the data is currently being reported on the Annual Performance Reports.

The application package will be updated to reflect the eight performance measures for the UBMS Program. Additionally, performance measure #4 and #5 measure the same group of students, but at different intervals. Performance measure #4 seeks information on UBMS students who complete graduation on time—within four years for the bachelor's degree and within two years for the associate's degree. Performance measure #5 captures data on UBMS students that require longer than the on-time graduation of two years for the associates and four years for the bachelor's.

Change: We will revise the section entitled, "Government Performance and Results Act (GPRA)" under the question: What are the performance indicators for the UBMS Program?

> 7. The percent of former UBMS students who earned a postsecondary degree in a STEM Field (i.e. science, technology, engineering, or mathematics); and
> 8. The cost per successful participant.

Comments on Individual Performance Measures:

Performance Measure #1: The percentage of UBMS students who take two years of mathematics beyond Algebra 1 by the 12th grade.

Comment: One commenter indicated that the "Rigorous Secondary Program of Study" (RSPS) in the standardized objectives already records this measurement; it is duplicative of information that programs are already tracking. This performance measurement can be adequately tracked using the RSPS objective without an additional 'performance measurement.'

Response: The standardized objective does not specifically measure the number of students who take two years of mathematics beyond Algebra 1 by the 12th grade. The objective measures students who graduate from high school and completed a RSPS.

Change: None

Performance Measure #2: The percentage of UBMS students who enrolled in postsecondary education.

Comment: One commenter stated that this duplicates information already collected on the Annual Performance Report, adding that asking staff to re-report information is burdensome.

Response: Since projects already must report this information annually, this measure does not impose any additional burden on grantees.

Change: None.

Performance Measure #3: The percentage of UBMS students who enrolled in a program of postsecondary education by the fall term following graduation from high school and who in the first year of postsecondary education placed into college-level math and English without need for remediation.

Comments: One commenter expressed several concerns about their ability to provide the requested information:
- The information is not readily available to project staff.
- Collecting the information is burdensome taking additional time and resources to obtain the information.
- There are no standard identified course names/descriptions for remedial courses.

- There is no national standard to determine whether or not a student needs remedial courses.
- Obtaining information on students who attended a wide array of postsecondary institutions would be challenging.
- The institution the student attends should collect the data and not the UBMS project.
- UBMS students do not have to have a high academic need and enroll and persist at higher rates than UB participants. It seems unnecessary to capture the data with the already high levels of academic preparedness.

Response: This performance measure will help the Department assess the extent to which UBMS projects are able to adequately prepare students for success in postsecondary education.

Change: None

Performance Measure #4: The percentage of former UBMS students who enrolled in a program of postsecondary education and graduated on time - within four years for the bachelor's degree and within two years for the associate's degree.

Comments: The commenters noted that providing the required data would be extremely challenging given that UBMS students each year enroll in a number of different institutions of higher education (IHEs); one commenter noted that the project's former participants are currently enrolled in over 40 IHEs. The commenters also indicated confusion on what the Department means by "on time"; for example, is it completing a degree in 4 years, 5 years or 6 years? One commenter also noted that while the project has an idea as to how its UBMS students are progressing, many low income and first generation students, for financial and personal reasons; require additional time to complete a program of postsecondary education. The commenter stated that, "taking a few years longer should not be seen as a program failure but rather the result of persistence in the face of continued obstacles on the part of the students." Another commenter observed that "on time may vary according to colleges, majors, minors, study abroad, internship, financial circumstances, etc." One commenter indicated that this performance measure is again asking for information that is already required for the annual performance report and already being evaluated within the objectives. Another commenter stated that the Department allows Talent Search to count certain degree certificates and vocational programs that meet specific criteria. The commenter believed that these types of guidelines should also be applied to UBMS, instead of what the Department indicates in this performance measure.

Response: The Department determined that it would be necessary to establish a specific timeframe that is considered reasonable for achievement of the performance measure. The National Center for Education Statistics (NCES) generally measures "on-time" postsecondary

completion for Bachelor's degree as an award that normally requires at least four but not more than five years of full-time equivalent college-level work. An associate's degree is an award that normally requires at least two but not more than four years of full-time equivalent college work. The Department will measure the percentage of UBMS participants who graduate "on time" -- within four years of first enrollment for the bachelor's degree and within two years of first enrollment for the associate's degree -- using data from the annual performance reports.

Change: This performance measure has been revised to delete the word "former" as follows: "**The percentage of UBMS students who enrolled in a program of postsecondary education and graduated on time—within four years for the bachelor's degree and within two years for the associate's degree**.

Performance Measure #5: The percentage of UBMS participants who enrolled in a program of postsecondary education and attained either an associate's degree within three years or a bachelor's degree within six years of enrollment.

Comments: The commenters felt this performance measure was redundant because current projects already collect and report this information and the language of one of the standardized prior experience objectives for the FY 2012 UBMS competition will ensure that projects will collect and report this information.

Response: Based on performance measure for #4 regarding "on-time" degree completion, no additional reporting responsibilities by grantees are required as the data would be reported in the annual performance report.

Change: None

Performance Measure #6: The percentage of UBMS students expected to graduate high school in the reporting year that complete a Free Application for Federal Student Aid (FAFSA).

Comments: There were no specific comments relating to this performance measure.

Response: None

Change: None

Performance Measure #7: The percentage of former UBMS students who earned a postsecondary degree in a STEM field (i.e., science, technology, engineering, or mathematics)

Comments: One commenter indicated that this additional data collection is burdensome on projects and that this information may not be readily available to staff. The commenter further explained how students may change their major once they attend college for any number of reasons. In addition, the commenter noted that UBMS projects may do everything in their power to help a student enroll in college and choose a STEM major, but ultimately it is the student that is responsible for completing the degree within the STEM major and there may be little that the program can do once the student is at college.

Response: The Department is aware that students often change their majors for a variety of reasons; however, obtaining this information will provide the data needed to assess the success of the UBMS Program.

Change: None

Performance Measure #8: The cost per successful participant.

Comments: Several commenters stated that this performance measure does not provide a guideline for determining successful cost per participant or what data will need to be collected. Additionally, a commenter questioned what is the definition of a successful participant and how will it be reported?

Response: The Department will assess this measure by tracking the average cost, in Federal funds, of achieving a successful outcome, where success is defined as enrollment in postsecondary education of UBMS students immediately after high school graduation. The annual performance report will be used to analyze this measure. There are no additional reporting requirements.

Change: None

PROGRAM OBJECTIVES

Program Objective #2: Academic Performance on Standardized Tests

Comments: One commenter indicates that the objective asks for proficient levels in reading/language arts and math and states that required data obtained should be for science and math. Another commenter noted that in their particular State, the standardized testing process is being reconfigured and the test is only given once during the sophomore year, which may not accurately reflect the data for the objective. Additionally, there are concerns about including the word "state" in the objective because it does not leave room for any possible changes to standardized tests.

Response: To facilitate the awarding of prior experience (PE) points, each grantee must have an objective that addresses each of the statutorily-prescribed outcome measures for the UBMS Program. Therefore, the application package includes a standardized objective for each PE criterion, including academic performance on standardized tests.

The regulation that addresses this requirement is in 34 CFR 645.32(e)(ii)B and states: "Whether the applicant met or exceeded its approved objective with regard to participants served during the project period who met the academic performance levels on standardized tests as specified in the approved objectives."

In establishing this objective for the FY 2012 UBMS competition, the Department decided to use the state assessments in reading/language arts and math for the following reasons:

- All states have implemented state standards and requirements for assessing the performance of secondary school students in both reading/language arts and math;
- To measure if an Upward Bound Math and Science participant is prepared for college, the participant should be proficient in both reading/language arts and math; and
- UBMS projects are familiar with this objective as it has been used to measure "academic performance" since the FY 2007 UBMS competition.

Although we recognize there are problems and limitations with the state assessments, there are also problems with using the SAT/ACT tests for this objective. Unlike state assessments in which all students are required to take these tests in reading/language arts and math at some time during high school, not all high school students take the SAT or ACT tests and not all postsecondary institutions require the SAT or ACT tests for admission. Further, while states have set standards for the proficient level on the state assessments, there are no national standards as to what scores on the SAT or ACT tests indicate that the student is "proficient" in the subjects tested. Without a proficient (or comparable) standard, the objective could not be used to determine the percentage of project participants that achieved at an acceptable level.

Change: None

Program Objective #6: Postsecondary Completion

Comments: One commenter suggested that the objective states that *"by the fall term immediately following high school graduation or by the next academic term (e.g., spring term) as a result of acceptance by deferred enrollment,"* would adversely affect those students who may not enroll immediately following graduation, but who are still able to attain an associate's or bachelor's degree within six years. The commenter believes that projects should be acknowledged for when students attain their degrees no matter when they have enrolled. Lastly,

the commenter agrees that these data should be tracked, but does not believe they should be taken into consideration as a standardized objective.

Another commenter expressed concern about the varying data between attaining an associate's degree versus a bachelor's degree. With the wide range, the commenter believes that it will be challenging for applicants to determine a rate that is ambitious and attainable.

Some commenters expressed concern that this objective would not count participants who do not enroll in a program of postsecondary education immediately following high school graduation. The commenters noted that because of various socioeconomic issues, not all UBMS participants are able to enroll in postsecondary education according to the timeline in the objective but may enroll later and complete a postsecondary degree.

Another commenter noted that this objective was not reasonable because it would require projects to follow-up on students for six years after high school graduation and the length of the grant is only five years; therefore a project could not meet this requirement during the grant period. Further, the commenter noted that UBMS projects cannot provide direct services to participants following high school and therefore could not assist participants while in college. Another commenter suggested that we replace the words "attain either an associate's or bachelor's degree" with "complete a program of postsecondary education." The commenter argued that the objective is not in line with either the purpose of UBMS nor the PE criterion for postsecondary completion because the regulations do not include the words "associate's or bachelor's degree". The commenter stated that in using the term "degree", the Department was "disregarding numerous postsecondary certifications and licensing programs" that "lead to crucial career fields for maintaining America's economy, industry and public welfare."

One commenter stated that it is difficult to create one target that addresses both four-year and two-year graduation rates as two-year schools have rates of 12% and four-year schools have rates or 23-80%. The commenter further explained that creating a target, it is hard to project whether students will pursue two-or four-year schools.

Response: To facilitate the awarding of PE points, each grantee must have an objective that addresses each of the statutorily-prescribed outcome measures for the UBMS Program. Therefore, the application package includes a standardized objective for each PE criterion, including postsecondary completion.

The regulation that addresses this requirement is in 34 CFR 645.32(e)(vi) and states: "Whether the applicant met or exceeded its approved objective with regard to participants who enrolled in a program of postsecondary education and attained a postsecondary degree within the number of years specified in the approved objective."

In establishing this objective for the FY 2012 UBMS competition, the Department determined that it would be necessary to establish a specific timeframe for determining if the project achieved its objective and chose six years because many students, including disadvantaged students, take more than four years to complete a bachelor's degree. Although a new grantee could not achieve this objective within the first grant cycle, most UBMS projects receive subsequent grants to continue their projects and thus would be able to determine in a subsequent grant period if the objective was achieved.

To provide for a valid measure of postsecondary success, it is important that the objective identify the group of students to be tracked and the timeframe for measuring which of those students completed a postsecondary degree. For this proposed objective, the group of students is those students who graduated from high school in a given year **and** enrolled in postsecondary education by the fall term immediately following high school or the spring term if enrollment is deferred by the institution. The period of measurement is six years. Although some students may defer enrollment and subsequently graduate, they would not be counted in determining if the project met this PE objective. However, the project would be able to report on these participants' success in the annual performance report.

The parameters for assessing PE points must be very specific so that an applicant can use this information to establish its targets for each of the standardized objectives. Since many potential applicants may have begun preparing their applications, we believe changing the objective, at this time, would confuse potential applicants.

We disagree with the commenter's suggestion that we replace the words "attain either an associate's or bachelor's degree" with "complete a program of postsecondary program", for two reasons. First, the regulations in 34 CFR 645.32(e)(vi) clearly state that the goal is the attainment of a postsecondary degree and second, UBMS is an intensive academic program with a new emphasis on assisting participants in completing a RSPS, therefore, it is reasonable to expect UBMS participants to enroll in degree programs.

Change: None.

DEADLINE/DUE DATES

Comment: Several commenters consistently expressed concerns regarding the closing date for the UBMS grant competition. These commenters conveyed that given the late comment period and additional review requirements from OMB, there was not sufficient time to conduct a UBMS grant competition, read and score applications, create a slate of funded projects and notify those projects before the 2012 project year start date. The commenters expressed that competitions are usually conducted between six and nine months before the program year start date. The anticipated competition date may cause projects to suspend all services to students.

One commenter proposed that the due date be postponed because it will conflict with the most intense component for existing grantees and it places grantees at a disadvantage when federal regulations prohibit work on a grant application during operational hours.

Response: In response to the suggestion that the Department postpone the UBMS Program competition, there is no authority for the Secretary to provide additional extensions to current grantees' awards, most of which expire this year. Therefore, the currently planned FY 2012 competitions for the UBMS Program must proceed as scheduled. The Department is diligently working to ensure that awards are made on or before August 30, 2012. We are working on an expedited schedule and we strongly feel that awards will be made prior to the expiration of existing grants.

Change: None

MISCELLANEOUS

Comment: One commenter stated that in the draft application, the description of indicators of Need for the program appear to address Upward Bound selection criteria, not the selection criteria for UBMS.

Response: The Need section in the application will be updated to reflect criteria for Need for the UBMS Program.

Change: We will revise the section entitled, "Instructions for Project Narrative" under Need to incorporate criteria for UBMS.

Comment: One commenter questioned if the UBMS student information could reside in the data system of the hosting institution?

Response: The Department does not regulate where data should be housed as long as it is accessible to program staff and secured to protect students' information.

Change: None

Comment: One commenter expressed a concern about adding CPP points and not increasing the points for PE. The commenter also believes this would violate the TRIO authorizing legislation. The commenter cited the legislation and refers to fiscal years 1994-1997, prior experience points were given 15 out of a possible 115 points or 13%. The commenter argues that by adding the CPPs, the Administration reduces the level of consideration given to prior experience to 15 out of 125 points or 12%. The commenter further stated that PE points are to ensure that programs that have been serving students successfully would be able to continue to do so.

Response: The Department has not violated the authorizing legislation for the Federal TRIO Programs. The legislation stipulates: that "the level of consideration given the factor of PE shall not vary from the level of consideration given such factor during fiscal years 1994 through 1997, except that grants made under section 1070a–18 of this title shall not be given prior experience consideration." As stated in the Notice Inviting Applications, the maximum CPPs points an application may receive under this competition is 10. The maximum PE points an applicant that received a UBMS grant for project years 2008-2009, 2009-2010, and 2010-2011 may receive is 15 points.

Change: None.