GENERAL

Comment: Several data tables should be updated to coincide with the budget data tables.

Discussion: The data tables as presently constituted meets the U.S. Department of Education (Department) guidelines and creating additional tables would increase burden for grantees without producing any supplemental benefits to the projects.

Change: None.

Comment: The Department should change the Annual Performance Report (APR) due date as April is not an ideal time for submission.

Discussion: While the Department agrees that April is not an ideal due date, the program office needs time to review each report and make non-competing continuation awards prior to the beginning of the next project year. This could not be accomplished by changing the APR due date to the end of the school year.

Change: None.

NARRATIVE INFORMATION

Comment: The Department should change the layout of the Program Objectives Table from portrait to landscape to make the table more conducive for reporting data.

Discussion: The Program Objectives Table is in Microsoft Word. Grantees currently have the option to change the page layout from portrait to landscape to accommodate their data.

Change: None.

DEMOGRAPHIC DATA AND DATA REGARDING SERVICES PROVIDED

Comment: How does the Department defines who is a "new" and who is a "continuing" GEAR UP student?

Discussion: GEAR UP grantees using the Cohort Model can serve students as early as Kindergarten as long as the schools served have a 7th grade. This also applies to State grantees using the Cohort Model. State grantees using the Priority Student Model can serve any secondary school student who meets the defined criteria.

For State or Partnership grantees using the Cohort or Priority Student Model, a new GEAR UP student is defined as a student who is receiving GEAR UP services for the first time during the reporting period. A continuing student is defined as a student who received GEAR UP services in the prior reporting period.

Comment: The Department should collect richer information on the number of GEAR UP students with Limited English Proficiency (LEP) and Individualized Education Programs (IEP) and how those students are being served.

Discussion: Completion of the tables that collect data on services provided to students with LEP and students with IEPs, although useful, is not required by the Department.

Change: None.

Comment: State Grantees should be required to list their participating schools. Similarly, National Center for Educational Statistics (NCES) Identification (ID) Numbers for both State and Partnership grantees should be collected as well.

Discussion: The Department agrees and has implemented both of the recommended changes.

Change: State grantees are now required to list their participating schools. State and Partnership grantees are required to list the NCES ID numbers of participating schools.

Comment: The Department APR should provide operational and consistent definitions for – services required under the Higher Education Opportunity Act (HEOA).

Discussion: The Department will define rigorous academic curricula and comprehensive mentoring in the revised APR, in accordance with the HEOA changes. The remaining required and recommended services will be deliberately undefined to allow grantees the flexibility in administering the services to students and parents.

Change: None.

Comment: The heading in a data table should be modified from stating parents to stating "families/guardian(s)", as many students do not live in a traditional home.

Discussion: The Department agrees with the recommendation. The Department realizes that many GEAR UP students currently reside in non-traditional family units and the APR should capture their living arrangements.

Change: In addition to the word parents, families and guardian(s) will be included.

GEAR UP STUDENT OUTCOMES

Comment: The variables listed in the Student Enrollment in Courses by Grade Level Table should be aligned with the variables contained in the Courses Completion Table.

Discussion: The Department agrees with the recommendation. Capturing the same variable in both tables will streamline the information listed in the Enrollment and Completion Tables.

Change: The Student Enrollment in Courses by Grade Level Table has been revised to correspond with the Courses Completion Table. In addition, the Department will include an additional column for English/Language Arts.

Comment: Course completion should be defined for consistent data collection.

Discussion: GEAR UP grantees are provided with the flexibility to determine how course completion is defined across school districts that they collaborate with. It would be very difficult to create a definition that is applicable to every school district served by a GEAR UP grant.

Change: None.

Comment: Include an additional column for collecting the number of students performing at or above grade level in Science in the Educational Progress by Current GEAR UP Students Table to increase consistency in data reporting.

Discussion: The Department agrees and has implemented the recommended change.

Change: An additional column has been added to the Educational Progress by Current GEAR UP Students Table to collect data on the number of students performing at or above grade level in Science.

Comment: The columns Number of Students Taking the PSAT or PLAN by end of 10th Grade and the Number of Students Taking ACT or SAT Exam by the end of 11th Grade are enabled for data entry for earlier grades.

Discussion: The Department requires grantees to report on the total number of students who have taken the PSAT or PLAN by the end of their 10th grade year, ACT or SAT by the end of their 11th grade year. We understand that some students may take these standardize exams in earlier grades; however the Department does not want to create additional burden on the grantees.

Change: None.

Comment: The Department should continue to collect data on target schools after the grant's funding has expired.

Discussion: The Department cannot require grantees to collect and report on data after funding has ended.

Change: None.

Comment: The Department should revise the data collection method used to calculate baseline high school graduation and college enrollment data. It is also recommended that the APR use a 4 year cohort graduation rate which would more accurately reflect the number of graduates.

Discussion: The Department utilizes the graduation data to establish a baseline as a comparison measurement between 12th grade graduation rates before the GEAR UP cohort reaches 12th grade and current graduation rates once the GEAR UP cohort graduates.

Change: None.

SURVEY DATA

Comment: The Department should mandate when surveys should be administered during the academic year and the years within the grant cycle that surveys need to be administered.

Discussion: GEAR UP grantees are required to administer surveys to students and parents at least every two years. GEAR UP grantees have the flexibility to administer the surveys when they expect to receive an adequate response rate for students and parents. Mandating a specific time of the academic year for administering the surveys could reduce the response rate across grantees.

Change: None.

Comment: The Department should add a mandatory question to the student and parent surveys requesting information on the number of years a student has received GEAR UP services.

Discussion: The Department does not want to create additional burden on the survey requirements by adding an additional mandatory question. Grantees may include an additional question on their survey pertaining to the number of years a student has received GEAR UP services, if they choose to do so.

Change: None.

Comment: The Department should measure survey responses over the number that responded to a specific APR question, not the total number of respondents.

Discussion: Creating response rates for individual survey questions would create additional burden on the grantees without adding any benefits to the programs.

Change: None.

Comment: The Department should address the adequate response rates for the surveys.

Discussion: The adequate response rates for surveys have been established by the Department and cannot be altered.

Change: None.

Comment: One commenter recommended the Department should develop an electronic form for reporting data that was submitted incorrectly in the APR which would simplify the current system which requires grantees to submit changes to the original APR in writing.

Discussion: The electronic APR system provides grantees 75 days to reenter the system and correct data that was incorrectly reported. Grantees are not required to submit written changes to the Program Officer until this time has elapsed. Further, the electronic reporting system has built in edit checks that alert grantees to data inconsistencies.

Change: None.

Comment: The APR should disable fields which are not applicable to grantees during a reporting period.

Discussion: Typically there are six different cohorts that are required to submit an APR each project year. While most partnership grantees follow a single or multiple cohorts, many state grantees using the priority student model are serving students from grades 7-12 from the first year of the project. It would be extremely costly to make the recommended change and the change would not result in improved data collection.

Change: None.

Comment: The Department should allow grantees to capture student services through an electronic scanning process instead of requiring grantees to use sign-in sheets

Discussion: The commenter's suggestion is not applicable to the revision of the APR. Grantees are permitted to develop their individual data collection systems.

Change: None.

Comment: Grantees who were awarded competitive preference priority points in the 2011 competition should report on each measurement for the determination of future funding decisions.

Discussion: The Narrative Section of the GEAR UP APR provides an opportunity for grantees to discuss the progress they have made in addressing the competitive preference priorities for which the grantees received additional points in the 2011 competition. It should be noted that responses to the competitive preference priorities will have no impact on future funding decisions.

Change: None.

Comment: The Department should require grantees to provide more comprehensive reporting during the no cost extension period.

Discussion: The Department currently requires an Interim Report for grantees who request more than a four month no cost extension. In addition, each grantee is required to submit a Final Performance Report (FPR) at the end of the extension period.

Change: None.

Comment: The Department should include a drop down menu on the electronic web reporting site to indicate the specific current year of funding for the grant.

Discussion: The Department agrees and will create a field for the grantee to enter the grant's current year of funding.

Change: The APR will be revised to add a funding year field.

Comment: How will the APR will measure and report on the Quality of the Project evaluation selection criterion that was required in the 2011 application?

Discussion: The Department understands the need for grantees to measure evaluation outcomes. The APR is not the document used for reporting evaluation activities. Grantees are required to report on evaluation outcomes in their Biennial Evaluation Reports which are due every two years.

Change: None.

Comment: What services will be required for grantees that opt for a seventh year component and, how will these services be reported on the APR?

Discussion: The Department does not anticipate mandating specific services for the seventh year. The Department is currently developing a list of services grantees may opt to use during the seventh year. The APR has been updated to include fields which allow for reporting of a seventh year component.

Change: New fields have been added to the APR to accommodate reporting requirements for grantees that have a seventh year.

Comment: How will future GEAR UP grantees report on providing services to students who have received services under a previous GEAR UP grant but who have not yet completed the 12th grade?

Discussion: The Higher Education Opportunity Act mandated that future GEAR UP grantees must provide services to students who received services under a previous GEAR UP grant but have not graduated from high school. The APR will not need to be revised to provide a mechanism for grantees to report on these students. These students will be reported as continuing GEAR UP students.

Change: None.