Student Support Services Program
Summary of Public Comments on
Proposed Changes to the 2013-2014 Student Support Services Annual Performance Report
(APR)
Following 60-Day Review Period

On March 31, 2014, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the <u>Federal</u> <u>Register</u> inviting comments by May 30, 2014, on the proposed annual performance report (APR) for the Student Support Services (SSS) Program. Fourteen (14) commenters submitted approximately thirty-seven (37) individual comments (i.e., multiple comments from individual commenters).

In addition to the array of comments received on several areas of the APR, the majority of the commenters also expressed a desire for a longer window for completion of the APR beyond the standard 30 days and for greater clarity in the APR's instructions. The Department reviewed each of the comments and concerns and has made some changes to the APR to reduce the burden and clarify the reporting requirements.

The following is a summary, discussion, and actions taken, as appropriate on the proposed SSS APR. Some minor changes to the APR that are of a technical nature (e.g., updates to the reporting period from 2012-13 to 2013-14) are not discussed below but have been made to the revised form and instructions.

1) <u>Reporting Burden</u>

<u>Comments</u>

Most commenters stated that the data requested during the APR process is necessary and reasonable. Four comments were made to the effect that the estimated 15 hours is very low and that 40 hours or more is the correct effort required for completing this report. Two commenters requested the ability to input data directly to the Department rather than using spreadsheets or comma-separated value file format. Two commenters suggested that technical assistance should be provided by the Department.

<u>Discussion</u>

The amount of time taken to complete the APR varies from project to project, dependent on many factors, such as the size of the project and the degree to which the records maintained by the project are up to date and in a format that is efficient to use with the Department Web data collection system.

In regard to the comment that the Department should allow grantees to input data directly via the Web application system, the system provides the following four options to grantees for submitting their data:

1. Download—Grantees can download last year's data, update the file and then upload it directly to the Web application.
2. Upload—Grantees can upload an Excel/CSV file directly to the Web application.
3. Transfer—Grantees can transfer last year's data directly to the Web application and can update and add participant records online.
4. Enter Participant Data—Grantees can individually input participant data directly to the Web application.

Finally, during the data collection period, grantees can contact the Help Desk for technical assistance and may contact Program staff should they need assistance with the APR.

Action Taken

None taken.

2) APR instructions

Comments

Several commenters suggested that the APR instructions be reviewed for redundancy, contradictions, and clarity. Some commenters suggested that the fields should remain unchanged from one APR to the next and that no unnecessary fields should be included. Some commenters requested that "if…then" clauses across fields should be shared with grantees.

Discussion

In regard to the instructions' redundancy and lack of clarity, the Department agrees with the commenters; therefore, the instructions have been revised with two goals in mind: (1) eliminate redundancy and (2) provide more clarity.

Regarding the comments related to retaining both the chronology of the field and field options across reporting periods, the Department makes every effort to retain the same field chronology as well as the same field options. However, if statutory changes require the collection of additional data and/or that existing data be collected differently, the Department must adhere to the statute; therefore, revisions must be made to the APR when required.

Finally, regarding the sharing of the data validation edits, the Department is unable to provide this information in a timely manner because up until the day the Web application system goes live, the Department is testing the Web application system and may need to make revisions to the edit validations. Please note that the APR is available to grantees at least 2-3 weeks prior to going live so that grantees may begin to compile their data.

Action

None taken.

3) Timeframe for APR completion

Comments

Three commenters requested that the window of time for completion and submission of the APR be extended.

Discussion

The Department concurs that the need for accurate and high-quality data justifies allowing some additional time for submission of the APR.

Action

Currently, the data submission time period is four weeks; however, the Department will extend it to six weeks.

4) Due date for the APR

Comments

Two commenters were concerned that having the APR open later in the year or at unpredictable times makes the process more challenging for grantees.

Discussion

The Department makes every effort to collect the data in a timely manner. Circumstances beyond the Department's control, however, such as statutory or policy changes as well as Federal budget issues (e.g., furlough) may impede the Department's data collection schedule.

Action

None taken.

5) Deceased and Deployed Military Students

Comments

Some commenters suggested that deceased or deployed military students should not be calculated into a grantee's objectives.

Discussion

While the Department recognizes grantees' concerns regarding the inclusion of deceased participants as it relates to Prior Experience (PE) points, there is no mechanism in place to identify and remove these students from the calculations. Furthermore, because 2013-14 is the third and final year for assessing PE in the FY 2010 funding cycle and because there needs to be consistency in how PE is calculated among the three PE assessment years, the Department is not revising the APR to capture this information. However, for FY 2015, the APR will be revised so that the Department can exclude deceased participants from future PE calculations.

Regarding the exclusion of students who have been called to military service, it has and will continue to be the Department's policy not to remove these students when calculating PE. As such, when grantees are developing their objectives they should take this into account.

Action

None taken.

6) Persistence

Comments

Three commenters noted that some students will miss the fall semester of an academic year, then return in the spring. These students are not counted as persisting for the persistence objective.

Discussion

In order for a student to be counted toward a grantee's persistence objective, that student must meet the criteria set forth in the Higher Education Opportunity Act (HEOA).

§646.22 (e)(2) (4 points) Postsecondary retention. Whether the applicant met or exceeded its objective regarding the participants served during the project year who continue to be enrolled in a program of postsecondary education from one academic year to the beginning of the next academic year or who complete a program of postsecondary education at the grantee institution during the academic year or transfer from a two-year institution to a four-year institution during the academic year.

As indicated above, the HEOA mandates that in order to be included as having persisted, a participant must be enrolled at the beginning of the next academic year.

Action

None taken.

7) Reinstatement of withdrawn students

Comments

Two commenters expressed concern over treatment of students who withdraw from the SSS program then return at a later date. One commenter stated that a reinstatement option needs to be added to the APR in order to allow information about these students to be reported. Another suggested that because there is no way to change the cohort for a student who has left and returned, that student now has limited time for success in achieving the required degree by the point of measure. A third commenter suggested that when participants left then returned to the program, the APR did not accurately reflect these students as continuing participants, and that there should be a way to report students who transfer from a 2-year institution to a 4-year institution and then back to the 2-year institution again.

Discussion

Students who leave the SSS program and then re-enter the program at a later date are considered "continuing participants." Grantees are not allowed to change a participant's cohort because the cohort, as defined in the objectives, is based on the year they were first served. As such, students will remain with their original cohort and the completion objective (a 2- or 4-year degree) will be evaluated based on the pre-established cohort (i.e., when they were first served).

Regarding the comment that students are not being accurately reflected as continuing participants when they re-enter the SSS program, it is the responsibility of the grantee to ensure that they are providing accurate information at the time they submit their data. The Web application generates a series of reports prior to final submission that provides information about the grantee's data submission. For example, in Tiers 1 and 2, the Web application contains a list of all of the participants who were reported as having been served in the reporting period. This list contains the participant's name, participant status, eligibility status, and cohort year. Grantees should carefully review this list as this is the definitive list of participants who were served in the reporting period.

Action

None taken.

8) 2-year school graduation and transfer rates

Comment

One commenter noted that students at 2-year institutions may transfer to 4-year institutions, then submit a transcript to the 2-year institution to complete the requirements for a two year degree. The same commenter stated that 2-year institutions sometimes retroactively award degrees to

students who earned qualifying credits in the past but did not apply for the degree for which they were qualified.

Discussion

For purposes of the Student Support Services Program, a student must be enrolled at the grantee institution when receiving a degree to be counted toward either the graduation or the transfer portions of the achievement objective. Students who leave an institution without earning a degree or certificate, then retroactively receive that degree or certificate while no longer enrolled do not count toward the project's graduation objective. In addition, transfer students from a 2-year to a 4-year institution who had not obtained a degree or certificate prior to transferring but later retroactively receive a degree or certificate from the project's institution (grantee) cannot be counted as transferring with a degree or certificate.

Comment

One commenter stated that the APR does not provide a way to record when students transfer from one community college to another before transferring to a 4-year school.

Discussion

Students who transfer from a 2-year institution to another 2-year institution may be reported under field 31, option (1) of the APR.

Comment

The commenter suggests that there should be a way to specify that a 2-year student who earned a degree or certificate transferred to a 4-year program at the same school, rather than to a different institution.

Discussion

Information about whether 2-year students are continuing at a 4-year program at the same institution or at another institution is not required by the HEOA. In order to minimize the reporting burden on grantees, the Department does not request this data. These students would be reported as graduated and transferred, however; any student who receives a certificate or graduates with an associate's degree and transfers to a bachelor's degree program should be reported as graduated and transferred (see Field 31, options 11 or 12 of the Record Structure).

Action

None taken.

9) Tracking 2-year degrees at 4-year institutions

Comments

One commenter suggested that students at 4-year institutions who leave the institution with a 2-year degree should be credited as persisted and graduated.

Discussion

The HEOA does not allow the Department to award credit for a two year degree earned at a four year institution. The criteria for determining whether a student counts toward a grantee's graduation objective is set by the HEOA:

§646.22(e)(4)(4 points) Degree completion (for an applicant institution of higher education offering primarily a baccalaureate or higher degree). Whether the applicant met or exceeded its objective regarding the current and prior participants receiving a baccalaureate degree at the grantee institution within the specified number of years.

Action

None taken.

10) Tracking long-term graduation rates

Comments

One commenter would like long-term graduation rates to be tracked beyond the specified point of measure for 2- or 4-year schools.

Discussion

The Department does not have the authority to require grantees to track beyond the point of measure for graduation; however, nothing precludes grantees from continuing to track their students beyond the point of measurement.

Action

None taken.

11) <u>Graduation timelines for rural or disabled students</u>

<u>Comments</u>

One commenter noted that small or rural schools sometimes do not offer the courses needed for timely graduation of students; also, disabled students may take longer to complete a degree or certificate. The APR does not provide a way to accommodate these challenges.

<u>Discussion</u>

The standard for determining if a student has met the achievement objective is set by the HEOA; the students must achieve the required degree by the point of measure. During the pre-application workshops, potential applicants were instructed to set their objectives based on the eligible pool of students to be served and the trends of their populations (i.e., graduation and retention). Grantees are encouraged to account for any special circumstances affecting graduation rates at their institutions by developing ambitious and attainable objectives.

<u>Action</u>

None taken.

12) <u>Tracking of Veterans, Homeless, or Foster Care participants</u>

<u>Comments</u>

One commenter stated that they do not know why they have been asked to track veterans, homeless or foster care participants.

<u>Discussion</u>

The Department does not request that grantees track veterans, homeless or foster care participants.

<u>Action</u>

None taken.

13) Reporting of permissible services

Comments

One commenter noted that the APR does not track all services that a grantee may provide to students, providing an incomplete picture of the work done by the grantee.

Discussion

While permissible services may provide great value to participants, in order to minimize the reporting burden, the Department only requires grantees to provide information on the required services.

Action

None taken.