Student Support Services Program
Summary of Public Comments on
Proposed Changes to the 2013-2014 Student Support Services Annual Performance Report
(APR)
Following 30-Day Review Period

On July 10, 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 August 11, 2014 on the proposed annual performance report (APR) for the Student Support Services (SSS) Program. Seven comments were submitted.

The Department reviewed each of the comments and concerns and has made some changes to the APR to 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, or minor changes in wording) are not discussed below but have been made to the revised form and instructions.

1) <u>Deceased and Deployed Military Students</u>

<u>Comments</u>

Some commenters agreed with comments made from the prior comment period that students who are deceased or deployed for military duty should be exempt from calculations of objectives.

<u>Discussion</u>

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 the possibility of this

eventually into account, particularly if significant numbers of their participants fall into this category.

2) **Persistence**

Comments

Some commenters requested that students who miss the fall semester of an academic year but return in the spring should be counted toward the grantee's 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.

3) **2-year school graduation and transfer rates**

Comment

Two commenters suggested that 2-year school students who apply for and receive their degree after leaving the grantee institution should be counted as graduated for the degree attainment objective if the degree earned falls within the timeframe delineated for their Student Cohort Year, currently set at 4-years.

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 the grantee institution without earning a degree or certificate, then retroactively receive that degree or certificate while no

longer enrolled at that institution, do not count toward the grantee institution'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 grantee institution cannot be counted as transferring with a degree or certificate.

Action

None taken.

Comment

One commenter suggested that students who transfer from a 2year institution to a 4-year institution without graduating should be counted as a success in the transfer rate calculations.

Discussion

Students must earn their degree or certificate <u>and</u> transfer by the fall of the next academic year in order to count toward the transfer objective for 2-year institutions.

Action

None taken.

4) **Pass/Fail Classes**

Comment

One commenter stated that GPA calculations are affected by remedial courses that do not earn a grade but only a pass or fail indicator.

Discussion

Each grantee should use its host institution's policy for calculating GPA, including their host institution's policy for factoring in pass/fail course grades.

Action

None taken.

5) **Transition to McNair Program**

Comment

One commenter expressed concern that if students in an SSS program transfer to a McNair program and no longer participate in SSS, this will appear as a "negative" on the APR because the student is no longer being served. Such students would be marked as prior participants who are enrolled but not receiving SSS Services.

Discussion

Students who no longer participate in the SSS program but who participate in the McNair program do not appear as a "negative" on the APR. They are evaluated in the same way as all former SSS participants, and whether the student participates in McNair does not affect whether the student counts as a persisting student or as a success for graduation. These students will be assessed based on the same standards as other students, as required by the regulations.

§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.

(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.

(5) Degree completion and transfer (for an applicant institution of higher education offering primarily an associate degree). Whether the applicant met or exceeded its objectives regarding the current and prior participants at the grantee institution who—

(i) (2 points) Complete a degree or certificate within the number of years specified in the approved objective; and

(ii) (2 points) Transfer within the number of years specified in the approved objective to institutions of higher education that offer baccalaureate degrees.

6) **Instructions**

Comment

Instructions:

Page 6-8 Revised Definitions that Apply
Suggestion: Incorporate this into page 11-15 Instructions for Participant Data File field information or incorporate both sections into Section 1, Part 1. Stating information once would reduce redundancy and confusion.

Discussion

We do not concur. We have a section entitled "Definitions That Apply" to reduce the burden of grantees having to search for definitions within the instructions. Also, since the definitions are not always field specific, that is, they may apply to multiple fields, a glossary is more appropriate. As such, the glossary approach eliminates redundancy.

Action

None taken.

Comment

Field 35 – Amount of Financial Aid Received - To reduce the data collection burden, can Field 35 – the amount of financial aid received – be eliminated as a Per-Participant APR field and instead in Section I, Part 1. C. Project Characteristics, ask how many participants receive financial aid.

Discussion

Obtaining an aggregated number of participants who receive financial aid and the total amount disbursed is not very meaningful since most SSS participants will receive some form of financial aid. The specific amount of financial aid disbursed to each student is more useful since it can be used to determine to verify the correct distribution of grant aid monies to a specific participant.

Action

None taken.

Comment

SECTION 1, PART 1
Field 15
Suggestion: To accommodate all eligibility types, it would seem beneficial to split the three eligibility types into different fields or to add Disabled, Low-Income and First-Generation as well as Disabled and First-Generation. Statistically, splitting the information to show all types and combinations of eligibility would illustrate a better picture of need.

Discussion

While there is merit to this suggestion, we are unable to accommodate it in this APR clearance because it skews our data regarding the eligibility requirements for the project.

§646.11   What assurances and other information must an applicant include in an application?

(a) An applicant must assure the Secretary in the application that—

(1) Not less than two-thirds of the project participants will be—

(i) Low-income individuals who are first generation college students; or

(ii) Individuals with disabilities;

(2) The remaining project participants will be low-income individuals, first generation college students, or individuals with disabilities; and

(3) Not less than one-third of the individuals with disabilities served also will be low-income individuals.

Action

None taken.

Comment

Why not wait until the new grant cycle beginning 2015-2016 to add Field 37 Participant Name Change and Field 38 Student's Case Number to Section II? At that point, the Social Security Number for tracking purposes could be deleted.

Discussion

Many SSS grantees expressed concern about not being able to track their participants because of name changes (e.g., marriage); therefore, given these concerns, field 37 has been added, Participant Name Change, and field 38, Participant's Case Number, has been deleted.

Action

None taken.