Student Support Services – Fiscal Year 2015 Competition
Summary of Public Comments with Responses

Introduction

The U.S. Department of Education (Department) received 402 comments from individuals interested in the Student Support Services (SSS) competition, some of which addressed several topics. The majority of the comments centered around four broad areas of concern, which included the competitive preference priorities; the standardized objectives, specifically changes in the point of measurement for SSS completion objective; funding concerns; and concerns about the timeliness of the fiscal year (FY) 2015 competition process. We also received a number of miscellaneous comments, which suggest the need for clarification on several issues. In addition, we received a number of comments that were specific to potential applicants, which we addressed through direct outreach to the commenters.

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 (Notice) and the application package for new awards for FY 2015.

Competitive Preference Priorities

General:

Comments: Many commenters requested the elimination of the Competitive Preference Priorities (CPPs). Commenters expressed concern that the availability of 13 points under the CPPs devalues or dilutes Prior Experience Points (PE points) by creating a maximum potential score of 128, of which up to 15 points may be PE points for those applicants eligible to receive them. They noted that in the FY 2010 competition, the maximum score was 115, of which up to 15 points may be PE points.

Some commenters noted that in two recent TRIO competitions, Upward Bound and McNair, the number of points assigned to CPPs increased – 10 for Upward Bound, 12 for McNair, and now 13 for SSS. These commenters expressed concern that there is a trend of increasing numbers of points assigned to the CPPs, and that some of these CPPs are weighted more highly than some of the selection criteria.

Commenters further noted that by diluting PE, the CPPs essentially change the spirit of the program as provided in the Higher Education Act of 1965, as amended. They view PE as a way to recognize grantees that compete under a new competition for the quality of services provided to students through the successful achievement of approved objectives of the expiring grant.

They go on to note that given the points attached to the CPPs, some applicants with little or no experience in project implementation to eligible students could be successful in the competition over those with long histories, which would result in an interruption of services to students.

Many commenters expressed concern that the inclusion of CPPs creates an excessive burden for applicants. These commenters suggested that while the CPPs are optional, the competitive nature of the SSS program and the high weight placed on the CPPs creates a strong pressure to apply for them. Commenters stated that while the CPPs require a wider scope of services for students, they do not provide any additional funding to support the extended or new services. Other commenters suggested that much of what is asked for in the CPPs is already being done by SSS, and that, therefore, they are redundant.

Some commenters stated that the Department has not articulated why the selection criteria for SSS published in the regulations are not sufficient and need to be supplemented, nor how or why the CPPs have been chosen. Some commenters suggested that changes in program focus should occur through reauthorization of the Higher Education Act, not through the implementation of CPPs. A few commenters expressed concern that the CPPs value policy trends and research over the practice of providing program-specific services to students with adjustments for specific local needs. Some commenters suggested making the CPPs into Invitational Priorities with no point values attached to them.

Response: While the Department recognizes the additional burden in addressing CPPs in a SSS application and in implementing new or modified services, the CPPs provide an opportunity for grantees to receive additional points for addressing some of the challenges that face SSS eligible students in innovative ways with the ultimate goal of better meeting SSS program goals.

The Department acknowledges the value of the continuity of SSS projects that have demonstrated through their annual performance reports the successful achievement of objectives that contribute to the postsecondary education completion agenda. There is also appreciation of the value in providing continual support to students throughout their years in school without interruptions in service. However, it was never the Department's intent to dilute the value of PE. Rather, in order to balance the need for continuity of service with the goal of finding new and innovative ways to increase postsecondary persistence and completion, the Department will include two CPPs, worth a total of six points, in the final Notice and application materials under the FY 2015 SSS competition. The Department believes these priorities will create opportunities for projects to address critical challenges facing many SSS-eligible students, thereby improving postsecondary outcomes, while also minimizing the impact of the CPPs on the weight associated with the selection criteria and PE points.

Change: The competitive preference priorities will change in the final draft of the Notice and application package. There will still be two competitive preference priorities but they will be

worth 3 points each, for a total of 6 points possible for competitive preference priorities. They will be: 1) priority for non-cognitive interventions (1 point) and additional points if the non-cognitive intervention is supported by moderate evidence of effectiveness (2 points); and 2) priority for counseling (1 point) and additional points if the counseling intervention is supported by moderate evidence of effectiveness (2 points).

Comments: Some commenters expressed support for the CPPs and for the emphasis on evidence-based practices as a means to increase student success. Others were concerned that the emphasis on policy or research is not consistent with the goals of a program designed to deliver services, as conducting research requires selective provision or denial of services. In addition, they argued that relying on research limits the impact of local knowledge of what is successful or not with a specific population of students.

Response: Some of these comments reflected confusion about the purpose of using research to inform SSS program activities in the upcoming grant cycle. While the CPPs ask applicants to use research that meets the moderate evidence of effectiveness standard set by the What Works Clearinghouse to guide their proposed activities for these CPPs, SSS grantees are not asked to conduct research. SSS remains a program for the delivery of services to students; the CPPs allow additional points for using evidence-based practices to guide the plan for delivery of services. In addition, we do not believe that relying on research precludes applicants from using their own knowledge and experience to inform their project proposals. The Department expects that applicants who address the CPPs will use evidence-based research as well as their own experience to devise strategies that will most effectively meet the needs of their campuses' SSS-eligible student population.

Change: No change.

Comments: A few commenters expressed concern that there is no provision to assess the outcomes of CPPs to determine if grantees are successful in doing what they said they would do in this area, as there are no PE points or objectives associated with them.

Response: While no standardized objectives are associated with CPPs the Department believes that the successful inclusion of innovative strategies relating to the CPPs will have positive impacts on the attainment of the standardized objectives and thus the PE points earned. Grantees will continue to use formative and summative evaluations to determine how to use the activities proposed in the CPPs to further improve their ability to meet the objectives of the SSS program. Finally, the Department may consider strategies for including questions related to the CPPs in the annual performance reports submitted by grantees, in order to gather information on their implementation and impact. This additional information, if collected, would not affect the assessment of PE points for grantees.

Change: No change.

Comments: Some commenters expressed concern over the page allocation for the CPPs, as CPP 1, with a potential value of 10 points, is allotted 4 additional pages, and CPP 2, with a potential value of 3 points, is allowed 8.

Response: The two CPPs in the final draft of the application notice will each have two parts. Four pages will be allowed for each subpart of each CPP. Therefore, a total of 16 additional pages will be allowed to address the CPPs, 8 total for each CPP.

Change: The page allocation for the CPPs has been adjusted in the final Notice and the application package.

Comments: Some commenters requested a change to the language in the draft application package, stating that the application package asks grantees to go "beyond what they're already doing." If what a currently funded grantee is already doing goes beyond SSS requirements and meets CPP requirements, the commenters felt the applicant should be able to use these activities to justify the CPP.

Response: We agree with the commenters that grantees should not be required to propose new activities if existing activities already address the competitive priorities, particularly where they align with supporting evidence.

Change: We will remove references to "new activities" from the final Notice and application materials.

Competitive Preference Priority 1 – Increasing Postsecondary Success

Developmental Education

Comments: We received numerous comments on the developmental education component of CPP 1, which ranged from representatives of four-year institutions believing that they would be disadvantaged because many do no provide developmental education or remedial courses; expressions of surprise that the Department would have the projects focus on developmental education when research suggests that participation in developmental education can hinder some students progress toward college completion; providing developmental education is expensive; and observations on what they view as the limitation of postsecondary education studies in the What Works Clearinghouse.

Response: While the Department continues to believe in the importance of more effective developmental education practices, after reviewing the comments and not intending to disadvantage any group of potential applicants, the Department has decided not to include developmental education under CPP 1. The Department encourages successful applicants to

continue to explore strategies and practices that would reduce the time to degree for SSS participants, including by improving developmental education outcomes.

Change: Deleted developmental education as a subpart of CPP 1. However, there will still be two competitive preference priorities: 1) priority for non-cognitive interventions (1 point) and additional points if the non-cognitive intervention is supported by moderate evidence of effectiveness (2 points); and 2) priority for counseling (1 point) and additional points if the counseling intervention is supported by moderate evidence of effectiveness (2 points).

Competitive Preference Priority 2 (a)—Providing Individualized Counseling for Personal, Career, and Academic Matters and (b) Individual Counseling Activities Based on Moderate Evidence of Effectiveness

Comments: Commenters expressed concern that the application process would be burdened by CPP 2, as in order to apply for all three points under this CPP, applicants must find a study with evidence-based research to support the inclusion of activities that will be used to address the CPP. Many commenters expressed concern that the available studies vetted by the What Works Clearinghouse (WWC) that would apply to postsecondary institutions pursuing the suggested types of reform are very limited, forcing applicants to either use a very small subset of research to base their applications on or forcing applicants to do extra work in finding an adequate study to meet the WWC guidelines for moderate evidence of effectiveness. Some commenters felt that applicants would be unable to respond to local data about what works at a particular institution if they are required to use the WWC data to inform practices.

Response: The Department is interested in promoting the use of evidence-based research to inform activities in order to improve student outcomes. The Department expects that applicants who address the CPPs will use evidence-based research as well as local data sources to devise strategies that most effectively meet the needs of their campuses' SSS-eligible student population. If the available studies already vetted by the WWC do not sufficiently address the needs of an applicant responding to the CPPs, an applicant may increase the WWC research base by submitting a study for consideration under the WWC guidelines of moderate evidence of effectiveness.

Change: No change.

Comments: Some commenters wondered whether the individualized counseling will apply to all SSS students or just those that meet the definition of high need, as "first-generation" is not included in the supplemental priority's definition of high-need but is sufficient for selection into an SSS project.

Response: Individualized counseling is a permissible activity for all SSS students, as per the authorizing statute:

(See § 402D. 20U.S.C. 1070a-14 (b).)

Change: No change.

Comments: Some commenters wondered who will evaluate the studies. The commenters were concerned that peer reviewers will provide inconsistent standards in determining which studies meet the WWC's standards for moderate evidence of effectiveness.

Response: Peer reviewers will not evaluate studies for meeting WWC's standards. Studies not already present in the WWC will be sent to the Institute of Education Sciences (IES) to be assessed for meeting this criterion. IES is the research arm of the U.S. Department of Education, sets evidence standards for the What Works Clearinghouse, and has the necessary expertise to determine whether a particular study meets those standards.

Change: No change.

Comments: Many commenters stated that the definition of counseling in CPP 2 is unclear and that the words counseling and coaching are used interchangeably, while the words imply different credentials, salaries, and training of staff. Some requested the removal of the word counseling from both the CPP and the permissible services in the statute, stating that providing licensed counselors is beyond the means of an SSS project. Some commenters noted that counseling is a permissible but not a required service for SSS, and thus it should not be included as part of a CPP. Many commenters stated that this CPP does not add anything new to SSS and thus should be eliminated, as individualized advising or counseling is built into the permissible services.

Response: As acknowledged by the commenters, individualized counseling for personal, career, and academic matters is permitted, but not required, for all SSS projects. Since it is not a required activity, this competitive preference priority is intended to incentivize all applicants to provide counseling services, and to propose ways to improve the effectiveness of counseling using evidence-based practices, which includes coaching but also other strategies. Further, the Department does not necessarily intend to set specific requirements for the credentials or expertise of counselors. Rather, the Department's goal is to encourage applicants to provide counseling in ways that are supported by evidence, which may or may not require certain expertise or credentials. Each SSS applicant may determine the required credentials and expertise for its counseling and advising staff, according to the determined counseling needs of its eligible student population and the guidance provided by existing evidence. Projects are encouraged to leverage institutional resources, including counseling and advising resources, through collaborations or student referrals.

Change: No change.

Comments: Some commenters approved of the implementation of practices based on evidence-based research, but believed that the three points awarded to CPP 2 does not justify the extent of the burden created by requiring grantees to research evidence-based practices and institute changes based upon them.

Response: The Department recognizes the additional burden in addressing CPPs in an SSS application and in implementing new or modified services, including services based on evidence-based research. However, the Department also sees the value in bringing innovative ideas into the SSS program in order to find better ways of achieving SSS program objectives. The CPPs provide an opportunity for applicants to receive additional points for addressing some of the challenges that face SSS eligible students in innovative ways, with the ultimate goal of better meeting SSS program goals. Additionally, in order to ease the burden on applicants, included in the footnotes to the final Notice are studies of non-cognitive and counseling interventions that would meet the Moderate Evidence of Effectiveness standard.

Change: No change.

Comments: Some commenters were concerned that there is more research available in the WWC that would apply to four-year institutions than two-year institutions, putting two-year institutions at a disadvantage when addressing this priority.

Response: In order to address each subpart 2 of each CPP, applicants need to cite one study that supports the proposed activities in subpart 1. Applicants should find the studies that support practices that are the best fit for the identified needs of the eligible student population at their institutions. While it is unclear what specific research the commenters are referring to, even if a study examined an intervention at a four-year institution, the strategy could still be applicable to two-year institutions. In cases where a strategy has to be adjusted to fit a two-year institution, the supporting study and corresponding strategy may still be used, as long as the applicant provides an accompanying justification of any modifications to the strategy. Additionally, if the available studies already reviewed by the WWC do not sufficiently address the needs of an applicant responding to the CPPs, an applicant may submit a new study for review by IES to determine if it meets the WWC standards for moderate evidence of effectiveness.

Change: No change.

Comments: Some commenters felt that this priority should go beyond the scope of coaching or counseling, and that it should be open to other evidence-based practices that might contribute toward SSS program goals.

Response: While the CPPs in the final Notice and application materials focus on non-cognitive interventions and individualized counseling, the use of evidence-based practices is encouraged

for all applicants proposing to run a SSS project. The absence of a CPP regarding evidence-based practices for a particular project service or activity does not prohibit an applicant from taking applicable research into consideration when devising an application.

Change: No change.

Prior Experience Points

Comments: Some commenters stated that prior experience (PE) points make it too difficult for new applicants to be funded.

Response: Although in accordance with the authorizing statute, eligible applicants may earn up to 15 PE points, the Department awarded over 190 grants to new applicants under the FY 2010 SSS competition. Therefore, we strongly encourage new applicants to apply.

Change: No change.

Standardized Objectives

Comments: The majority of the commenters requested that the timeframe for the degree completion objectives be four years for two-year institutions and six years for four-year institutions, as per the previous competition in FY 2010, rather than three years for two-year institutions and five years for four-year institutions, as per the draft FY 2015 application. Commenters expressed concern that the new measurement points will create a disincentive to serve part time students, disabled students, students who are in more challenging academic programs, or students who have other indicators that they may take longer to complete their degrees. Some commenters pointed out that since many SSS eligible students have competing challenges in their life, including working while in school, supporting family, and lack of preparedness for college, completing degrees often takes longer on average for these students.

Commenters also expressed concern that much educational data is formulated around four- and six-year completion rates and that determining the data at the three- and five-year marks, in order to respond to the selection criteria and determine targets for the objectives, will be more challenging for applicants.

Commenters suggested that the new completion objectives might discourage programs from working with students past the point of measurement.

Some commenters suggested that SSS internal data will provide clearer trends and information if the same data is tracked from cycle to cycle, rather than varying it.

Response: The Department agrees with the concerns raised by the commenters.

Change: The points of measurement for the graduation objectives will be four years for two-year institutions and six years for four-year institutions in the final Notice and application materials.

Comments: Some commenters requested that graduation and transfer be evaluated separately in the objectives for two-year institutions. Presently, the objective reads that a student must graduate with an associate's degree or certificate and transfer to a four-year institution.

Commenters expressed concern that it is sometimes in the student's best interest to transfer before getting an AA degree, particularly since many four-year institutions will not take some types of two-year transfer credits, such as STEM, Music, and Art credits. Requiring a degree or certificate before transfer for this objective creates a disincentive to accept students who are in programs where acquiring an AA degree before transfer is not in the student's best interests, such as the fields cited above.

Commenters also suggested that transfer students should count toward a grantee's persistence objective, even if they transferred without a degree, as these students are continuing their studies and making progress toward a degree.

Response: The standardized objectives are written to capture the level of a grantee's achievement relative to persistence, degree completion and degree completion and transfer from a two-year to a four-year institution. Thus, the Department designed the annual performance report so that the level of attainment of the graduation and transfer objectives are captured and evaluated separately for two-year institutions. While the Department recognizes that some students transfer before obtaining an AA degree or certificate, grantees can only be held accountable for reporting on students that were enrolled in the grantee-institution during the performance year. We encourage projects funded at two-year institutions to establish a level of achievement for transfer taking into consideration the anomalies that may occur based on the pool of eligible students identified at their institution.

Change: No change.

Comments: Some commenters requested that students who leave the SSS project in order to enroll in a McNair project at the same campus should continue to be reported by SSS for persistence, good academic standing, and graduation. If the student has not yet graduated but cannot count for the program's objectives, it appears as if the student has become inactive.

Response: Persistence and good academic standing objectives are calculated based on the participants served that year; therefore, students who no longer participate in the SSS project are not part of that calculation. They do not count either for or against the SSS program they are no longer participating in. The student will still be evaluated as part of the project's graduation objective.

Change: No change.

Comments: Some commenters suggested that students who are active guard or reservist service personnel should be exempt from the four- and six-year graduation rates for program evaluation when being called into active service is the reason they become inactive participants.

Response: The Department acknowledges the sacrifices made by active guard and reservist service members and their families, including sometimes delaying educational or other career plans when called into active service. However, in order to provide consistent standards of measurement across the program, the Department is unable to modify the methods by which the standard objectives are calculated. The Department encourages applicants proposing to serve eligible student populations with large numbers of active guard or reservist service personnel to propose targets that are ambitious, yet attainable, for the graduation and transfer objectives.

Change: No change.

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Timeliness

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Comments: Many commenters expressed concern over the timeline for award notification for the FY 2015 SSS competition. Commenters expressed concern that many SSS programs either do or propose to intake students prior to the start of the academic year, particularly those programs proposing to provide an orientation or summer component prior to the start of classes. Stability in staffing would benefit from timely award notifications, as well as timely start-up of the new grants.

Many commenters cited 20 U.S. Code 1070a11 (C7), which states, "The Secretary shall inform each entity operating programs under this division regarding the status of their application for continued funding at least 8 months prior to the expiration of the grant or contract."

A large number of grantees requested that an additional year of funding be provided to current grantees and that the competition be delayed for a year to prevent problems with timeliness of award notifications.

Response: The Department takes very seriously the need for timely notification of new awards. The Department has committed to making award notifications in early August.

Change: No change

Comments: Some commenters expressed concern over the amount of time available to develop their new SSS applications, desiring a 45- or 60-day timeframe from the publication date of the application package to the closing date. Commenters cited the time involved in collecting new and additional data to respond to changing objectives and the CPPs.

Response: The Department's goal is to ensure that prospective applicants have at least 45 days for completion of their grant applications.

Change: No change.

<p style="text-align:center"><u>General Comments</u></p>

<u>Allowable Costs</u>

Comments: Some commenters stated that they would like to be able to purchase books for students who cannot afford textbooks or e-books and e-book readers. The commenters noted that some students are in a true hardship situation financially and are not purchasing books for their classes.

Response: The provision of direct financial aid to students is an unallowable cost under the SSS Program regulations. However, those SSS projects that choose to provide grant aid to students may counsel those student recipients to use the funds towards the purchase of textbooks, etc., while realizing that the students are free to use the monies as they determine is best for their needs.

Change: No change.

<u>Different Populations</u>

Comments: One commenter expressed concern that having projects with focused populations disadvantages smaller colleges or any schools that don't have the population to justify applying for these projects.

Response: Specialized project types to serve different populations were included in the SSS Program through the Higher Education Opportunity Act of 2008 and the subsequent renegotiation of the program regulations. So as not to disadvantage any applicants, the Department has also included a "Regular SSS Program" project type. Under this project type, applicants may propose to provide services to low-income, first-generation, and/or disabled students, which may include students from the different populations of students served by the specialized project types, e.g., teacher preparation or STEM.

Change: No change.

<u>Formatting</u>

Comments: Some commenters requested clarity about where to put the CPPs when uploading an application.

Response: The Department agrees with the need for clarification. The CPPs should be uploaded under Other Attachments Form, as per the updated application instructions.

Change: The final application package will include specific formatting and submission instructions regarding the submission of the CPPs.

Comments: Many commenters requested that the draft application be modified to read that single spacing is allowed for titles, headings, footnotes, quotations, references, and captions, as well as all text in figures and graphs,

Response: The Department agrees. The final Notice and application materials will reflect that headings, footnotes, references, captions, etc. should be single spaced, as would be appropriate in a published study.

Change: The Department will adjust the application package to reflect that single spacing is appropriate for titles, headings, footnotes, quotations, references, and captions, as well as all text in figures and graphs.

Comments: One commenter suggested that all citations throughout the project narrative would not fit on a one-page abstract.

Response: Applicants are only required to list one study for CPP 1b and one study for CPP 2b in the abstract. No other citations from the narrative need to appear in the abstract.

Change: No change.

Comments: One commenter suggested that more than one year of proposed budget expenditures should be included, so that increasing salary and benefit costs can be accounted for.

Response: Applicants should provide a comprehensive and detailed budget narrative for the first 12-month budget period only. Budget levels for subsequent years of the grant award will be determined based on the availability of funding, as well as a grantee's demonstration of substantial progress in meeting the approved project objectives.

Change: No change.

Comments: One commenter requested clarification regarding whether the table of contents is limited to one page or whether it might be more than one page.

Response: The table of contents may be more than one page, but we encourage applicants not to exceed two pages. It will not count toward the program narrative's page limit requirement.

Change: No change.

Comments: Some commenters requested clarification regarding the GEPA requirements, specifically whether a specific form must be used to meet this requirement, and also where in the application it should go.

Response: Applicants must submit a GEPA form, available along with the application download on Grants.gov once the application package is released. The GEPA form must be uploaded under the Other Attachments Form. It will not count toward the 65-page limit requirements.

Change: No change.

Funding

Comments: Many commenters expressed concern about funding levels. Commenters were concerned that funding levels for prior grantees will not return to that of the FY 2010 competition, but of the 2012 budget year, which was reduced from the 2010 level.

Commenters were also concerned that currently funded grantees cannot apply for the same cost per participant as new grantees, and requested that all grantees be funded at the same cost per participant, or that current grantees receiving a lower cost per participant than new grantees should be allowed to reduce their participant numbers.

Response: The Department recognizes the desire for increased funding for all prior grantees. However, due to the funding available, the Department is unable to support increasing the cost per participant for prior grantees as this would reduce the number of total awards and the total number of students served by the SSS Program overall.

Change: No change.

Comments: Some commenters desired clarification regarding the amount of money allotted for continuation awards and the amount allotted for new awards for FY 2015. These commenters suggested that the low amount of money for continuation awards means that the Department is not interested in refunding many prior grantees.

Response: The comments reflect confusion about what is meant by a new award vs. a continuation award. All currently funded grantees with projects that end in FY 2015 that are successful in the FY 2015 competition are considered in the amount estimated for new awards. The amount listed for continuation awards includes currently funded grantees that have one or more years remaining as a result of receiving a five-year award under a competition that pre-dated the Higher Education Opportunity Act of 2008, which changed the duration of all awards to five years.

Change: No change.

Comments: Some commenters wondered if additional points could be provided to institutions who provide cash match to programs, as well as how in-kind support should be reflected in the budget. Specifically, is it appropriate to include in-kind support or space provided by the institution with an estimated monetary value in the budget as part of institutional support.

Response: The points associated with the selection criteria and CPPs, which will be used to score applicants in this competition, are the only areas for which points will be assessed. Applicants may earn up to 16 points under the Institutional Commitment selection criterion for resources devoted to the SSS project including in-kind support. However, a cash match is not requested, with the exception of grant aid if an applicant is not eligible to receive funds under part A or B of Title III or Title V, nor required under the SSS Program and no additional points may be earned for its provision.

Change: No change.

Participant Eligibility

Comments: One commenter wanted clarification on what counts as documentation of status as a low-income individual. Specifically, the commenter wanted to know if the FAFSA is submitted electronically and signed with an electronic PIN, if the Student Aid Report generated from that application would be considered a signed document.

Response: The Student Aid Report may be used as a resource in the determination of the low-income status of an individual, since it is generated based on a signed FAFSA.

Change: No change.

Comments: Some commenters stated that they want to be allowed to serve students before those students enter postsecondary education.

Response: In accordance with the program regulations, students must enrolled or accepted for enrollment at the host institution in the next academic term to be served by an SSS project.

Change: No change.

Performance Measures

Comments: One commenter noted the performance measures provided in the draft application are inconsistent with the standardized program objectives, as stated in the law. The commenter specifically noted that performance measure 2 mentions 'first-time college students,' which could be read to exclude transfer or returning eligible students with a need for services at four-year institutions. In addition, performance measure 4 is 'cost per successful outcome,' which the commenter believes is a potentially flawed way to assess success.

Response: Although related, the performance measures are intended to be different from the standardized program objectives. The performance measures are used to measure the performance of the program as a whole while the standardized program objectives are used to award points relative to individual project performance under the prior experience criteria as

provided in the program regulations. The Department uses data from the APRs submitted by individual grantees to estimate program performance and efficiency for the SSS Program in response to the reporting requirements of the Government Performance and Results Act.

Change: No change.

Program Eligibility

Comments: Some commenters were concerned about certain institutions where a two-year institution has been placed under a State system, which offers programs as a four-year institution on one campus and has separate campuses that are essentially two-year campuses. The commenters ask for clarity on an institution's eligibility to apply for a program on a two-year campus as a two-year school when the IHE as a whole would be considered a four-year institution.

Response: The Department recommends that applicants refer to the definition of "different campuses" as provided in 646.7(c) of the SSS Program regulations. If questions remain, we encourage applicants to contact the individual listed in the final Notice and application package for further clarification.

Change: No change.

Comments: Some commenters requested that SSS eligibility be expanded to include non-profit organizations, mirroring what some other TRIO programs allow. Some cited benefits include that students attending a two-year school then transferring to a different four-year school in the same area could receive consistent services throughout college. Also, agencies hosting Upward Bound or other TRIO programs could provide continuous services from middle school to the end of college for those students who stayed in the same geographical area.

Response: The SSS Program regulations specifically identify only institutions of higher education or a combination of institutions of higher education as eligible applicants. There are no conditions specified under which other entities would be eligible to apply for an SSS project.

Change: No change.

Program Narrative

Comments: Some commenters requested clarification regarding whether current project staff should be mentioned at all in the quality of personnel section of the application.

Response: The minimum qualifications must be provided in the program narrative for all key positions, including educational qualifications and work-related experience. Applicants should not provide qualifications or other information pertaining to current staff.

Change: No change.

Program Profile Form

Comments: One commenter requested clarification regarding what the information page is, specifically wondering if this is the same as the program profile page, and requesting that the application state clearly if it is.

Response: The "information page" is the same as the SSS Program Profile Form.

Change: The final Notice and application materials will clearly use the term "Program Profile Form," and references to the "information page" will be deleted.