

## **Responses – Strengthening Institutions Program Application Booklet Public Comment Period**

The Department (ED) received five comment documents regarding the Strengthening Institutions Program (SIP). Comments ranged from booklet and application format to content-specific queries. SIP staff has combined similar or overlapping comments, to facilitate the response and review of these comments.

**Comments:** Some comments provided recommendations to allow better program implementation. These comments consisted of: the Department allowing and expecting a three-month startup period for grants; the Department publishing guidelines for time and effort reporting and required data collection.

**Response:** The Department provides guidelines for the necessary information required to obtain a grant. The Department does not impose or dictate how institutions need to implement their grants. Other than requiring an implementation timeline, the Department does not dictate how much time projects dedicate to start up; institutions decide and propose their implementation strategies. Similarly, the Department does not impose a time and effort form; it requires that there be a form that indicates accountability-- the percentage of time and the work performed by each grant-paid staff member. Institutions may already have such forms and are free to use those. With regards to required data collection, the application booklet includes the Government Performance and Results Act (GPRA)-required data that each applicant must gather. Each applicant decides and proposes its own evaluation plan, including the type and frequency of the data to be gathered.

**Change:** No change.

### **Application Process:**

**Comments:** There were comments requesting the Department allow applicants to amend projects that have minor technical errors, such as requesting a larger amount than yearly specified or not including requested attachments. These comments expressed concern that 20% of projects, which could be potentially effective, are not read due to technicalities that come from oftentimes confusing submission requirements.

**Response:** Accepting documents and/or information on an application after the application period has closed compromises the integrity of the review. To avoid this, the Department includes an application checklist at the end of the application booklet, to remind applicants of the necessary application submission documents and where to attach them in G5.

**Change:** No change.

**Comments:** Some commenters expressed concern over the amount of time available to develop applications, desiring a 90- to 180-day timeframe from the publication date of the application package to the closing date. Commenters cited the time needed to write quality proposals.

**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.

**Comments:** Some commenters requested that the Department offer the Absolute Priority, Part F (84.031F) of the Strengthening Institutions Program (SIP) in FY 2015. Commenters felt it offered institutions with limited funds the opportunity to innovate, while providing sufficient funding to implement innovation.

**Response:** In FY 2012 the Department included evidence in the competition as a Competitive Preference Priority (CPP). In FY 2013, it created an Absolute Priority under Part F (84.031F) in order to provide up to two million dollars per year for institutions whose top three activities were supported by studies that were deemed strong or moderate by the What Works Clearinghouse (WWC). For FY 2015 the Department has returned to introducing evidence as a CPP, with only one grant activity supported by moderate evidence. Many factors were involved in this decision, including the lack of funding to continue supporting institutions at those levels, and the objection from past potential applicants that there were limited studies that addressed the myriad needs in their campuses, such as infrastructure investments. The Department then decided to continue fostering the need for evidence-based strategies while continuing to provide institutions with the flexibility to decide which of their needs to address in the grant.

**Change:** No change.

### **Application Forms and Attachments:**

**Comments:** Commenters requested the Table of Contents should be more detailed, further breaking down the sections currently listed to include where the selection criteria and language on the CPP is included.

**Response:** As the application booklet reiterates certain information in different locations, the Table of Contents is broken down by the broader headings that cross reference information.

**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 Part IV, the Assurances and Certifications section in Grants.gov.

**Change:** No change.

**Comments:** There were concerns regarding where to include information regarding the congressional districts served by the institution, particularly if the institution served multiple districts. Attaching this information to the SF424 was suggested.

**Response:** The application package does not request congressional district information; therefore the information is not required. Applicants who wish to include the information would need to include it in the Abstract or the application narrative itself. Nothing should be attached to the SF424.

**Change:** No change.

**Comments:** There were comments regarding the extent to which reviewers could evaluate an applicant's responses to the selection criteria they lack information and understanding of the project's setting. It was suggested that the Department allow a one-page description of the applicant organization to enhance reviewers' knowledge.

**Response:** Background information on a project's setting is typically included in the response to selection criterion one, where applicants analyze the strengths, weaknesses and significant problems of their institutions. Many applicants also include more information on the location of the project in the Abstract.

**Change:** No change.

### **Duplication and Formatting:**

**Comments:** Some commenters opined that there is too much duplication of information in the application package, increasing the risks of conflicting information and making the information onerous to read. Specifically, some commenters felt that the application booklet should not repeat what the *Federal Register* notice indicates, that the Dear Applicant Letter and Competition Highlights sections in the booklet be combined and that instructions regarding the application be located in one place in the booklet. The suggestion was made that an editor should review the entire document to minimize duplication and to ensure that the titles of documents are consistent throughout. Another comment pointed out an instance where the notice indicates that applicants provide studies for one proposed strategy, whereas the application booklet states to provide studies for the top strategy.

**Response:** While ED agrees that the information can be duplicative, the purpose of the application booklet is to further clarify the requirements set forth in the *Federal Register*. Therefore, there will be some duplication. Also, the ED believes it is important to reiterate certain information throughout the booklet, to underscore its importance to the process and review of applications. However, a staff member not affiliated with SIP will review the application booklet again to ensure that there is consistency throughout the document.

**Change:** The application booklet wording regarding strategies will be changed to reflect the language in the notice.

**Comments:** Some commenters requested that all formatting instructions should be listed one location, at the beginning of the application booklet. Commenters also requested the Application Checklist also be listed at the beginning of the application booklet.

**Response:** ED cross references certain formatting instructions, to highlight their importance to potential applicants. The Application Checklist is the conclusion of all the

information listed in the booklet; it is meant as the final corroboration that all the previous information was included in the application.

**Change:** No change.

**Comments:** Some commenters felt the format restrictions made it difficult to enhance understanding of the submissions. Comments were concerned with using outlines, tables and bullets when applicants are required to double space their applications.

**Response:** The requirement for all text to be double-spaced excludes the following: titles, headings, footnotes, quotations, references, captions, as well as text in charts, tables, figures, and graphs in the application narrative, which may be single spaced.

**Change:** No change.

### **Competitive Preference Priority:**

**Comments:** It is unclear what the purpose of the Competitive Preference Priority (CPP). To emphasize the requirements in the CPP, commenters suggested they should be added to the selection criteria.

**Response:** SIP selection criteria are established by the program's legislation (Sections 314 and 391 of the Higher Education Act of 1965, as amended). Changes to these criteria require Congressional action, which would be burdensome and time-consuming. Priorities allow the Secretary to emphasize current practices or actions that are of importance to higher education and the administration without interrupting Congress' work.

**Change:** No change.

**Comments:** There were concerns regarding the current CPP and past CPPs; the tight scoring bands for Title SIP grantees; the limited research in the What Works Clearinghouse (WWC) that is related to the legislatively allowable activities; and the varied needs of Title III institutions. There are many allowable activities that are directly related to improving student outcomes, institutional infrastructure and internal systems, but that do not have experimental research that meets the WWC standards.

Commenters were concerned that the inclusion of the CPP with the tight scoring bands would force institutions to forgo much-needed improvements in certain areas in favor of choosing activities that would meet the CPP in order to secure funding. A proposed solution was to reduce the number of points assigned to the CPP to 1 or 1.5, increasing the chances of well-researched projects without evidence also being funded.

**Response:** Additional points in competitive preference priorities are awarded to emphasize the importance of the priorities to the Secretary and to reward applicants who have expended extra effort in meeting the priority's requirements. For FY 2015, the points for the CPP have been reduced to three, and applicants are only required to provide evidence for one of their activities' strategy, not for all proposed activities. Therefore, applicants may implement evidence-based activities as well as those activities that they deem address their strongest needs and for which there is no evidence.

**Change:** No change.

**Comments:** Some comments stated that identifying strategies that meet the What Works Clearinghouse criteria and match the intent of the proposed project is difficult. Therefore, the CPP should be changed to “evidence of promise.” It was also requested that the Department allocate funds to engage IES staff to work with several grants, in order to increase the pool of evidence.

**Response:** Applicants do not have to submit only studies that have been reviewed by the What Works Clearinghouse (WWC). On the contrary, applicants are encouraged to provide studies that they believe will meet the WWC’s definition of moderate evidence. In doing this, the body of evidence reviewed by the WWC continues to increase for future applicants.

**Change:** No change.

**Comments:** Commenters requested that the CPP should be included only in one section of the application booklet. Because it’s mentioned throughout the document, some information seems redundant and, in some cases, incomplete.

**Response:** Due to the importance of the CPP and the fact that there are additional points attached to it, the Department feels the information needs to be reiterated throughout the booklet.

**Change:** No change.

**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.

### **Evaluation and Data Gathering:**

**Comments:** Commenters were concerned with identifying evaluators without violating bidding requirements or making promises to possible evaluators that may not be hired. The comments suggest that the Department instruct applicants to not identify evaluators prior to the award, to do so after the award.

**Response:** The Department does not require applicants to identify an evaluator in the grant. The requirement is for the applicant to have an evaluation plan for the proposed activities. Applicants may choose an evaluator prior to the award or after the award.

**Change:** No change.

**Comments:** Some commenters were concerned about how ED considered community colleges that also offered bachelor’s degree programs. These institutions may consider themselves as two-year campuses, as the majority of their degrees awarded are associate’s, but IPEDS identifies them as four-year institutions. The commenters ask for clarity on the kind of data to gather for performance measures.

**Response:** The data tracked should be guided by the project, the population targeted and the type of activity/activities proposed. If the grant is focused on associate's degrees, then it should track those data; if the grant focuses on bachelor's degrees, then those are the data to track. If the grant is geared towards both populations, then the institution must track both. Whichever data are chosen, there should be consistency.

**Change:** No change.

### **Technical Assistance:**

**Comments:** Commenters were concerned about the immediacy of responses to their questions. It was suggested that the Department could establish an automated FAQ hotline to avoid excessive interruptions to staff work. The hotline would be updated daily or weekly, providing applicants with the information they need throughout the application period.

**Response:** The Department agrees that it is a good idea. For this year's competition, it is too late to establish such a site; however, it will be considered for the next competition cycle.

**Change:** For this competition—no change. ED will seek to incorporate the suggestion for future competitions.

**Comments:** Commenters requested that the technical assistance webinars be in question and answer (Q&A) format, rather than going over the language published in the *Federal Register*, as serious applicants would know what the Federal Register language indicated. These Q&As would then be posted online after the webinar.

**Response:** To provide the comprehensive technical assistance, webinars are designed to not only go over the competition details, but to help applicants interpret the Federal Register language, allowing time for Q&A at the end. SIP had a long Q&A in the FY 2013 webinars, and will have the same for FY 2015. The Department agrees that the Q&A exchange should be posted. However, posting the complete exchange of questions does take time, as multiple questions on the same issues are combined and responses verified and vetted to be posted online. SIP was unable to publish the Q&A document in FY 2013 but is aiming to post the FY 2015 Q&As.

**Change:** No change.

**Comments:** Commenters expressed concern regarding some of the data requested and its availability; specifically, the academic and employment history of students, particularly out-of-state transfer students, and the endowment data—average value per FTE and average expenditures for library materials. The suggestion was made that the Department request that IPEDS collect the required data.

**Response:** There is uniformity in how IPEDS and all institutions collect data. Therefore, the data collected do not necessarily reflect what the specific program within the Department needs. However, the Department recognizes the need to facilitate data gathering for applicants and is moving towards using IPEDS data for certain of its application processes, such as Designation of Eligibility. Endowment data are collected

for the purpose of resolving tie-breaker situations. In the event of a tie-breaker, the average value of the endowments is calculated using the data submitted by all the institutions within funding range and comparing it to the institutions involved in the tie-breaker. This process ensures that applicants are compared to similar institutions.

**Change:** No change.

### **Language Clarity:**

**Comments:** It would be helpful to provide a project narrative glossary of terms, particularly for the terms “selection criteria,” “project,” “objective” and “activity” in the application booklet, as some terms are used interchangeably and inconsistently. Also, the glossary should be placed in the first pages of the application booklet, to provide clarity as applicants review the document.

**Response:** The Department agrees with this suggestion. A glossary can be included in future application booklets.

**Change:** No change.

**Comments:** Some commenters were concerned that the language indicating which institutions can apply if they have other IS grants (e.g., Title V), is unclear.

**Response:** The Notice Inviting Applications (NIA) contains detailed information regarding the relationship between Title III and Title V; current Title V grantees may not apply for or receive a grant under Title III. Additionally, the program regulations indicate the same information. The NIA also indicates that current Title III, Part A SIP grantees may apply for and receive a Cooperative Arrangement Development Grant.

**Change:** No change.