

Talent Search – Fiscal Year 2016 Competition Summary of Public Comments with Responses

Introduction

The U.S. Department of Education (Department) received 332 comments from individuals interested in the Talent Search program (TS) competition, some of which addressed several topics. The commenters addressed four broad areas with the majority of comments addressing the Competitive Preference Priorities (CPPs). Additional areas of some concern to the commenters were prior experience (PE) points, the selection criteria and the budget. We also received a number of miscellaneous comments, which suggest the need for clarification on several issues. We also 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 them, including whether subsequent changes have been made to the Notice Inviting Applications (Notice) and the application package for new awards for Fiscal Year (FY) 2016.

Competitive Preference Priorities

Comments: Many commenters requested the elimination of the CPPs. Commenters expressed concern that the CPPs are inconsistent with Congressional intent and have the substantive impact of favoring certain categories of applicants over others. For instance, commenters noted that they believe that large research institutions serving urban areas would be more likely to be able to identify tutoring studies with the relevant research backing, as compared with, for example, a tribal college serving a reservation. Several commenters also expressed concern that applicants located in small or rural areas would be disadvantaged due to the exorbitant cost of reliable transportation.

In addition, many commenters contend that the inclusion of CPPs creates an excessive burden for applicants. They also stated that while the CPPs are optional for applicants, in the current fiscal environment, every point counts, which creates increased pressure for applicants to address them. One commenter asserts that the inclusion of the CPPs, given the added pressure to address the priorities, adds to the number of required services that would have to be provided; the commenter argues that diverts resources and staff away from what are already burdensome and time-consuming services, given the numbers of students served by TS.

Several commenters felt the CPPs are duplicative and counterproductive in TS because both academic tutoring and mentoring programs are already permissible services allowed under the TS program.

Several commenters asked if the Department plans to provide sample studies from the What Works Clearinghouse (WWC) as it did for the Student Support Services (SSS) competition. Several commenters indicated that they were unable to find many studies in the What Works Clearinghouse that meet the Moderate Evidence of Effectiveness standard for tutoring and mentoring covering the middle school to postsecondary education levels. Several commenters indicated that a CPP more in line with TS's capacity to deliver quality programming might include assisting students in developing non-cognitive skills that are essential to postsecondary success.

Additionally, some commenters expressed support for the CPPs and for the emphasis on evidence-based practices as a means to increase student success.

Response: The Department does not agree that the CPPs are inconsistent with Congressional intent and the purpose of the program, which is to identify qualified individuals from disadvantaged backgrounds with potential for education at the postsecondary level and encourage them to complete secondary school and undertake postsecondary education. Rather, the CPPs encourage applicants to focus on promising strategies that have been the subject of research and have demonstrated positive impacts in evaluations of such interventions as a way to enhance the effectiveness of grant competitions and to improve outcomes for students participating in a TS program. Furthermore, the specific activities around which the Department is encouraging evidence-based strategies—mentoring and tutoring—are explicitly authorized in the Talent Search legislation.

It is not the Department's intention to disadvantage any applicant. The Department believes that the TS program and other Federal TRIO and GEAR UP Programs that provide services to high school students and adults are crucial for getting more students into higher education ready to succeed. The CPPs were designed to incent applicants to provide evidence-based tutoring and mentoring programs that increase the likelihood that students complete high school and enroll in a postsecondary institution. The Secretary is sensitive to the adjustments that projects may need to make in terms of service delivery to address the CPPs, but believes it critical that grantees identify and implement strategies that effectively support disadvantaged students.

While the Department recognizes the additional burden in addressing CPPs in the TS application, the Department also sees the value in providing applicants an opportunity to bring innovative ideas and evidence-based practices into the TS program. Applicants will receive additional points for addressing some of the challenges that face TS-eligible participants in innovative ways with the ultimate goal of better meeting TS program goals.

As acknowledged by the commenters, tutoring and mentoring are permissible, but not required, services allowed under the TS Program. Since these services are not required, the CPPs are intended to encourage all applicants to provide tutoring and mentoring programs that have been

the subject of research and evaluation as a way to improve outcomes for students participating in a TS program.

The Department does not plan to provide in the Notice Inviting Applications a sample listing of studies similar to what was done in the SSS competition, but we do anticipate providing additional guidance documents, for example FAQs, to assist applicants in finding applicable research. In general, the Department is interested in promoting the use of evidence-based research to inform activities in order to improve student outcomes and expects that applicants who address the CPPs will use evidence-based research to identify tutoring and mentoring strategies that most effectively meet the needs of TS participants. If the available studies already vetted by the WWC do not sufficiently address the needs of an applicant responding to the CPPs, applicants also have the opportunity to increase the WWC research base by submitting studies for consideration under the WWC guidelines of Moderate Evidence of Effectiveness.

The Department also sees value in assisting students in developing non-cognitive skills and recognizes their importance in achieving postsecondary success; however, the final Notice and application will not include a CPP focused on non-cognitive interventions. Applicants are free to pursue those activities outside of the CPPs.

The Department appreciates the support several commenters expressed for the CPPs.

Change: No change.

Prior Experience Points

Comments: Several commenters expressed concern that the Department will be basing Prior Experience (PE) points on criteria that were in effect prior to the current version of the regulations. They recommend that the criteria instead be based on current regulations. Additionally, another commenter expressed concern that postsecondary graduation was not being included as an objective for the purposes of calculating PE points.

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

Change: The application has been revised to reflect current regulations: Secondary School persistence, Secondary School Graduation (Regular) diploma, Secondary School Graduation (Rigorous) program of study, Postsecondary Education Enrollment, and Postsecondary Attainment. The application has also been revised to reflect postsecondary attainment as an objective for the purposes of calculating PE points.

Comments: Several commenters requested that the Department eliminate PE points because their inclusion makes it difficult for novice applicants to be funded.

Response: PE points are authorized by statute and the Department does not have the authority to eliminate their use. The Department strongly encourages applications from novice applicants. In the FY 2011 TS competition, 54 awards were issued to novice applicants.

Change: No change.

Selection Criteria

Comments: Several commenters requested that the Department remove or amend the Plan of Operation #6. Commenters stated that Sec. 643.21 (c)(6) should be eliminated or revised to exclude the requirement that one objective for TS projects is the rate at which students “continue in, and complete postsecondary education” portion; they believe this requirement holds TS projects accountable for something that is not part of their purpose or which they can influence, given that services are not provided to students once they enroll in postsecondary education programs. The commenters argue that the law indicates that one of the Outcome Criteria, which reads, “1070a-12 (vi) to the extent practicable, the postsecondary education completion of such students,” can be amended or removed on the basis of the term “practicable.”

Response: Section 402A(f)(3)(A)(vi) of the HEA, as amended by section 403(a)(5) of the HEOA, requires the Department to use postsecondary education completion, if practicable, in evaluating the quality and effectiveness of a TS project. §643.22(d)(6) is designed to reduce the burden on grantees. Consequently, because TS projects serve relatively large numbers of participants, we recognize that it may be difficult for the project to track all participants through completion of postsecondary education. Therefore, a TS project may track a randomly selected sample of its participants; or it may, but is not required to, track all participants who complete secondary schools and enroll in postsecondary education.

Change: No change.

Comments: Several commenters expressed concern that students completing high school early cannot be counted as meeting the Section (f) Outcome Criteria in the APR (___% of seniors served during the project year will graduate during the project year with a regular secondary school diploma in the standard number of years), as they did not complete high school in what is considered the standard number of years.

Response: The Department recognizes that State policies concerning the requirement for a regular secondary school diploma may differ; we provided a regulatory definition for this term that is broad enough to encompass varying requirements for a regular secondary school diploma.

We believe that the definition clarifies for grantees that their respective State standards should be used to determine whether a participant has attained a regular secondary school diploma.

We acknowledge that there are a variety of State policies concerning graduation requirements, including exit examinations. We also appreciate that some States may not define what timeframe constitutes a "standard number of years" for high school graduation with a regular secondary school diploma; and, therefore, we established a consistent point of measurement for determining a grantee's performance under the outcome criterion for high school graduation with a regular secondary school diploma. The National Center for Education Statistics (NCES) generally measures "on time" high school graduation (i.e., graduating within the standard number of years) as receiving a regular diploma within four years of entering ninth grade, which is consistent with the general approach to measurement and with high school graduation rates determined under the Elementary and Secondary Education Act of 1965, as amended (ESEA).

The Department interprets the standard number of years for high school graduation with a regular secondary school diploma generally to be one grade per year from the beginning of high school, which is usually ninth grade. Further, consistent with the ESEA regulations, in 34 CFR 200.19(b)(1)(iii), a student who passes the exit examinations for a regular high school diploma during the summer after the senior year would be considered to have graduated within the standard number of years.

A student who graduates prior to the conclusion of a student's fourth (or final) year of high school would also be considered to have graduated within the standard number of years.

Change: No change.

Comments: One commenter expressed concern that undocumented children are not currently eligible to participate in TS, and recommended that they be considered eligible for Talent Search and other TRIO programs.

Response: The Secretary recognizes the concern of the commenter that undocumented children should be considered eligible for Talent Search program. However, TS regulation, §643.3 specifies the documentation needed to determine who is eligible to participate in a project.

Change: No change.

Comments: Several commenters recommended that, given that the Secretary considers waiver requests for the requirement that program directors serve in this capacity for no more than three projects; it should be explicitly stated in the grant application and in the reading and scoring instructions that these waiver requests are allowable and points should not be withheld for having these requests. The commenters further expressed concern that peer reviewers have withheld points from TS applications in previous competitions based on the reviewers' professional "bias" as university administrators and/or managers of similar programs.

Response: The Secretary provides verbal and written notice during pre-application workshops, peer reviewer training sessions, as well as guidance to peer reviewers during the application review process, which stresses the fact that TS applicants are allowed to submit a waiver request for less than a full-time project director. The Secretary provides instructions to peer reviewers that points should not be withheld for an applicant having a waiver request in its application. Peer reviewers are instructed to rate an application on how well the applicant provides a justification for a less-than-full-time project director who would ensure efficient and effective administration of the TS project as prescribed in the TS selection criteria §643.32(c)(3).

Change: No change.

Comments: One commenter recommended that Dual Credit programs be included in the definition of “Rigorous Secondary School Program of Study”, as Dual Credit programs are Rigorous Programs of Study.

Response: The Department does not dispute that Dual Credit programs may be rigorous programs of study. The definitions that govern the TS program are from 2 CFR part 200, subpart A, or in 34 CFR 77.1 and cannot be arbitrarily changed by the Department.

Change: No change.

Budget

Comments: Several commenters recommended an allowable increase of at least 6% over the fiscal year 2011 base, since the increase in the Consumer Price Index has been 6% since that time and the increase in costs in higher education has been an estimated 8.5%. Several commenters also recommended that the Department increase the cost per student from \$460 to \$480, as that would allow applicants to better meet the legislative requirements of the program.

Response: The Department recognizes the desire for increased funding since the fiscal year 2011. However, the Department tries to strike a balance between maximizing the number of TS projects and students these funds can support with ensuring that grantee budget needs are met. Due to available funding, the Department is reluctant to increase the maximum grant award amounts over fiscal year 2011 or to increase the required cost per participant amount as this would reduce the number of total awards and students the program is able to support.

Change: No change.

Comments: One commenter requested clarification on the maximum award amount for a current TS grantee.

Response: For an applicant that is currently receiving a TS Program grant, the maximum award amount in the FY 2016 competition is the greater of (a) \$230,000 or (b) 100 percent of the applicant’s base award amount for FY 2015.

Change: The Department has revised the language in the Notice for clarity.

General Comments

Comments: Several commenters recommended that the narrative for Section 643.2 [“What Selection Criteria Does the Secretary Use?”] be included directly in the final approved Talent Search grant application under the “Instructions for Program Narrative” section, as that will provide a clear outline for grant writers. In the past, searching through a number of attachments to find the required information and instructions has been challenging and time consuming for the grantee.

Response: The Department agrees with this recommendation.

Change: The Department will add Section 643.2 of the program regulations to the “Instructions for Program Narrative” section of the grant application.

Comments: One commenter requested clarification on the number of pages allotted to address the CPPs.

Response: An application addressing the CPPs may include up to two additional pages for each part of each of these priorities, if addressed. Those maximum eight additional pages must be used to discuss how the application meets the competitive preference priority (or priorities). The additional pages allotted to address priorities cannot be used for or transferred to the project narrative or any section of the application.

Change: No change.

Comments: One commenter pointed out that on page 46, #1, an indication is given that the Department will notify applicants whose applications are not evaluated or selected for funding; however, they recommend that greater clarification be offered as to how this will occur.

Response: The certifying official of each unsuccessful application will receive formal written notification regarding the status of its application.

Change: No change.

Comments: One commenter requested clarification on how much time a project director has to commit to a TS project.

Response: Per the regulations in 34 CFR 643.32, a grantee must employ a full-time project director unless the director is also administering one or two additional programs for disadvantaged students operated by the sponsoring institution or agency, or the Secretary grants a waiver of this requirement.

Change: No change.

Comments: One commenter suggested that the Department require more than one year of proposed budget expenditures with the application, which would allow applicants to budget and plan for increases in the out-years.

Response: The Department appreciates an applicant's willingness to provide additional budgetary information. However, applicants are only requested to provide a comprehensive and detailed budget narrative for the first 12-month budget period. 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 abstract is limited to one page or whether it might be more than one page.

Response: The Department encourages applicants to limit the abstract to one page. The abstract will not count toward the program narrative's page limit requirement.

Change: No change.

Comments: One commenter requested clarification on the proportion of participants served by a TS project who must be low-income and potential first-generation college students.

Response: In accordance with one of the regulatory assurances in 34 CFR 643.11, at least two-thirds of the individuals an applicant serves under its proposed TS project will be low-income individuals who are potential first-generation college students.

Change: No change.