



NATIONAL COUNCIL FOR
COMMUNITY AND EDUCATION PARTNERSHIPS

Promoting Education Partnerships and Access to Higher Education

February 22, 2016

Kate Mullan
Acting Director, Information Collection Clearance Division
Office of the Chief Privacy Officer, Office of Management
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-4537

Re: Comment Request, Annual Performance Report for the Gaining Early Awareness for Undergraduate Programs (Docket No.: ED-2015-ICCD-0144).

Dear Ms. Mullan:

On behalf of the National Council for Community and Education Partnerships (NCCEP), the national not-for-profit organization that represents the Gaining Early Awareness for Undergraduate Programs (GEAR UP) grantee community, we are pleased to share our perspective on the proposed information collection in docket number ED-2015-ICCD-0144 .

We are grateful that the U.S. Department of Education has allowed the GEAR UP community a significant role in helping to inform the redesign of the GEAR UP Annual Performance Report (APR) under review. While not all of our recommendations were incorporated into the document under review, we are writing to express our support for the clearance of the proposed information collection. Over the past several weeks, we have discussed the revisions with the GEAR UP leadership community and conducted a survey to ascertain the overall level of support for the proposed information collection. With 64% of 127 active GEAR UP grantees participating in our survey, 100% of respondents support the adoption of the proposed APR.

As it pertains to the feedback being sought during the public comment period, we believe that the proposed APR is essential to the proper functions of the Department and will significantly reduce the burden on GEAR UP grantees without adversely affecting the quality or utility of the information collected.

To improve the utility and clarity of the information being collected, we recommend some minor edits, particularly to Section IV: GEAR UP Student Outcomes.

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Comments: Issue #1: Consolidating Course Enrollment and Course Completion. In prior iterations of the APR, the reporting period spanned two academic years, therefore it was necessary to ask respondents to report course enrollment and course completion separately. Given that the APR under review fixes a long-standing reporting challenge by aligning the reporting period to the prior academic year, the need for two separate tables on pages 23 and 24 may not be necessary. We recommend that the online APR that grantees use for reporting purposes should consolidate these two tables into a single table that captures both course enrollment and completion.

Response: The Department received feedback from the grantee community in favor of a course enrollment table and course completion table during the last APR clearance period. The tables will not be consolidated.

Change: None

Comments: Issue #2: Educational Progress by Current GEAR UP Students. Another artifact of the prior dual- academic year reporting cycle is expressed in the third column of Question #3, page 25. The column currently reads, "Number of Students with 5 or More Unexcused Absences During the First 2 Quarters of the School Year." This phrasing was appropriate when the respondents were reporting on a school- year that was in progress, but given the shift to a reporting period based on the prior academic year, we recommend that the column header be revised. The column header would be more aligned as stated here: "Number of Students with 10 or More Unexcused Absences by the End of the Prior School Year." Revising that wording will ensure that the information being collected is complete, yet will remain aligned to the research literature.

Response: The Department agrees with the commenter.

Change: The Department will change the table header to say "Number of Students with 10 or More Unexcused Absences by the end of the prior School Year".

Again, we applaud the Department's efforts to improve the quality of the GEAR UP APR while making great strides in minimizing the time, effort, and burden to do so. On behalf of the GEAR UP community, we urge the Department to consider these minor revisions we have proposed and approve the information collection under review.

Sincerely,



Alex Chough
Vice President for Government Relations

