



Feedback in response to

The Department of Education (ED) Notice: [Agency Information Collection Activities; Comment Request; Annual Performance Report for the Gaining Early Awareness for Undergraduate Programs](#)

CoBro Consulting provides evaluation services in completion of the U.S. ED Annual Performance Report for up to 30 GEAR UP grants each year. The following feedback is the collective, official feedback from the CoBro Consulting corporate principals.

1. **Comments: Page 5, in the table, re: the row heading: “Results: Has the objective been met? (Yes/No)”** It is not clear what the response should be if the objective was met for one cohort but not another, or if the objective was met compared to targets from the grant proposal or compared to a more current/applicable comparison group. We suggest adding ‘Partially’ as a potential answer (so Yes/No/Partially) and a request for further explanation in the table.

Comments: Commenter requested that the objective table which asked the question if the objective has been met; should not just have a Yes or No answer but instead; the commenter suggest adding the word partially.

Response: The Department concurs with this comment and agrees to make this change.

Change: The Department will add partial as a possible response to the question.

2. **Comments: Page 13, Ethnicity and/or Race Unknown Table.** The total for Ethnicity and total for Race should be separate and not added together, since those who are Hispanic or Latino will also be one of the listed races. Given this, we suggest adding a row for Non-Hispanic Latino and a row for ‘total’ to the ethnicity section, to make it clear that they are not combined with race.

Response: The demographic data collection section is consistent with the Department of Education’s policies which require the program to collect ethnicity and race in this manner.

Change: None

3. **Comments: Page 14, last sentence: If you choose to do so, please complete the following table indicating the unduplicated number of GEAR UP students who have been identified as homeless (as defined by the McKinney-Vento Homeless Assistance Act) or are in foster care (as defined by Title IV of the Social Security Act).** Suggest changing the underlined ‘are’ to ‘have been’ or ‘were’ in foster care, since the instructions are to report on the previous year and to be consistent with the subsequent table.

Response: The Department concurs with this comment and agrees to make this change.

Change: The Department will change are to were.

3.1 Comments: Page 16, table: Participant Distribution by Grade and Status (Cohort Students)

Using the definitions below the table, students in both columns (d) and (e) would be included in either column (b) or column (c) as well (since before they withdrew or dropped out, they would have been new or continuing at some point during the reporting period), so the total as currently stated in (g), # of Total GEAR UP Students Participants, would double-count some students. We suggest changing the formulas to the following to match the definitions below the table:

$$(f) \text{ \# of Active GEAR UP Students} = (b)+(c) - (d) - (e)$$

$$(g) \text{ \# of Total GEAR UP Students} = (b)+(c)$$

Response: The Department agrees with the commenter on changing the formulas.

Change: The Department will change the formulas for columns (f) and (g).

3.2 Comments: Re: the table heading: **(g) # of Total GEAR UP Students Participants:** Since ‘# of active participants’ is examined in a different section, it is confusing to specify ‘Participants’ here. Suggest removing the word ‘Participants’.

Response: The Department agrees with the commenter.

Change: The Department will remove the word “Participants”.

4. Comments: Page 17 table: Participant Distribution by Grade and Status (Priority Students)

Comments: Please see suggested changes in #4 above. These same changes to the equations apply to this table.

Response: The Department agrees with the commenter on changing the formulas.

Change: The Department will change the formulas for columns (f) and (g).

5. Comments: Page 19, Active Participation in GEAR UP Activities, #3 states: “What is total, unduplicated number of parents, guardians, or other family members that actively participated in one or more GEAR UP activities during the reporting period?” In this section, the number of parents/guardians/family members is asked. In a later section (#6 on page 20), the number of students with a participating family member is asked. Tracking the number of individual family members increases the burden substantially, and is virtually impossible to accurately track each individual parent/guardian/family member participating, for logistical reasons. We suggest maintaining consistency with the later table and asking ‘total unduplicated number of students with a parent, guardian, or other family member that actively participated...’

Response: The Department agrees with commenter.

Change: The Department will change the question to read “What is the total unduplicated number of students with a parent, guardian, or other family member that actively participated in one or more GEAR UP activities during the reporting period?”

6. **Comments: Page 20, instructions above table: Core Activities Provided to Parents, Guardians, and Family Members.** The last sentence of the instructions reads: “For each type of activity provided, indicate (a) the unduplicated number of students whose parents, guardians, or family members participated in the activity during the reporting period; and (b) the sum total of hours that the sum total of hours that parents, guardians, and family members participated in the activity.” Suggest removing the duplicate phrase (‘the sum total of hours that’).

Response: The Department agrees with commenter.

Change: The Department has removed the duplicate phrase “the sum total of hours that”.

7. **Comments: Page 23, Course Enrollment table. First column header: Grade student was in when course was enrolled.** Suggest changing to ‘Grade student was in when course was taken’.

Response: The Department agrees with commenter.

Change: The Department will change enrolled to taken.

8. **Page 25, instructions above table Educational Progress by Current GEAR UP Students**

- 8.1 The beginning of this section (Section VI) at the top of page 23 instructs to report on students in the prior complete school year. Therefore, in this table title Educational Progress by Current GEAR UP Students, the word ‘current’ should be deleted here, and the following edits should be applied as well.

Response: The Department agrees with the commenter.

Change: The Department will delete the word “current” from the heading.

- 8.2 **Comments:** Re: this portion of instructions: “**Enter the numbers in the row that coincides with the grade the students are in during the prior school year** (e.g., *If you served sixth grade during the first year of the grant and a standardized test was administered the first year to that sixth grade, please report on results of that standardized test when submitting the APR in the second year placing the information in the row for 7th grade since those students would be seventh graders in the second year.*)” Example should say ‘placing the information in the row for the grade level the students were in during the reporting period (i.e., 6th grade in this example)’

Response: The Department believes the current instructions are explicit and do not need to be revised.

Change: None

9. **Comments: Page 25, table: Educational Progress by Current GEAR UP Students.** The first column heading in the table says “Current Students.” Given the instructions at the beginning of

this section to report on the prior year information, we suggest changing this heading to “Grade During Reporting Period.”

Response: The first column actually says “Current Grade” not Current Students and the instructions for this section are very explicit.

Change: None

10.2 Comments: The column heading of: “Number of Students with 5 or More Unexcused Absences During the First 2 Quarters of the School Year.” Also given the instructions to complete the table for the entire prior school year, we suggest changing this to “..During the Entire Prior School Year.”

Response: The Department agrees with the commenter

Change: The Department will change the heading of the column to “During the Entire Prior School Year.

10. **Comments:** Page 26, last row of table: **Baseline High School Graduation and College Enrollment Data.** The example Fulton H.S. school year is 2008-20069. We suggest removing the extra digit from the year.

Response: The Department agrees with the commenter.

Change: The Department has updated this table to reflect recent years.