Educational Opportunity Centers – Fiscal Year 2016 Competition
Summary of Public Comments with Responses

Introduction

The U.S. Department of Education (Department) received comments from 106 individuals interested in the fiscal year (FY) 2016 Educational Opportunity Centers (EOC) Program competition, some of which addressed several topics. The commenters addressed eight broad areas, with the majority of comments addressing the Competitive Preference Priority (CPP)—Improving Parent, Family and Community Engagement. A large number of public comments were also received regarding Selection Criterion (H)—Quality of Project Design. Additional areas of concern to the commenters were objectives, project narrative page limit requirements, project narrative formatting, number of participants, and cost per participant.

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 FY 2016.

Competitive Preference Priorities

Comments: The majority of commenters expressed concerns regarding the CPP focused on "Improving Parent, Family and Community Engagement." Some commenters are concerned that parental and family involvement is not only impractical, but also does not reflect effective and efficient use of program resources since most EOC participants are adults. Commenters contend that the CPP does not fully fit the legislative intention of the program and that with limited funds, it would not be practical to coordinate efforts with participants' parents or families. One commenter noted that EOC projects serve adults, the majority of whom are over 25.

Several commenters felt that the CPP is duplicative because projects already coordinate with organizations that serve similar populations. The commenters believe that the CPP would be burdensome with the added pressure to address the priority and that projects do not have the resources and staff to implement the priority given the low cost-per-participant levels.

Other commenters expressed concern about the lack of studies from the What Works Clearinghouse (WWC) to support the CPP. In addition, commenters think the CPP is not part of the legislative intent of the program. Lastly, commenters indicated that the priority should not be competitive, but invitational, since applicants cannot sufficiently address the priority.

Response: The Department does not agree that the CPP is either impractical or inconsistent with the Congressional intent for the purpose of the program, which is to identify qualified individuals from disadvantaged backgrounds who want to enter or continue to pursue a program of postsecondary education and provide assistance to individuals applying for admissions and completing applications for financial assistance. The Department believes that EOC projects can serve as a catalyst for fostering collaborative outreach within the community. This CPP helps to emphasize the focus of collaboration of EOC projects with other entities and helps to ensure or solidify the presence of EOC in the community. By awarding additional points, there is an appropriate incentive for applicants to address this priority.

While the Department recognizes the additional concerns for addressing the CPP in the EOC application, the Department also sees the value in providing applicants an opportunity to bring forth innovative ideas to reach particular audiences. Applicants will receive additional points for addressing ways to promote community engagement with the ultimate goal of better meeting EOC Program goals.

The Department agrees with the comment that there are an insufficient number of studies from the WWC related to this priority; however, please note that, in using this priority, the Department has not requested that applicants provide evidence from the WWC to support their plan for addressing the CPP. Instead, the Department will rely on the judgment of nonfederal reviewers to evaluate and score the CPP on the extent to which the proposed plan for improving community engagement is likely to contribute to the overall success of the project.

In addition, the Department agrees with the commenters who state that the majority of EOC projects are providing services to adults, most of whom can be classified as independent students, although some projects are providing services to Talent Search (TS)-eligible students, as allowed by the EOC regulations. Therefore, the Department believes that the CPP is appropriate because it allows projects that serve adults and TS-eligible students the opportunity to present plans that are not limited to addressing community engagement, but may also include partnering with parents and families and other entities, such as local educational agencies (LEAs). However, the Department would like to clarify that the extent to which applicants provide plans that improve community engagement is the focus of the CPP for the FY 2016 EOC Program competition.

Change: No change.

Comment: One commenter stated that the definitions for the CPP-Supporting Military Families and Veterans should include a high school graduate who has a parent or guardian that is a veteran.

Response: The definition of Military or Veteran-Connected student, was established as part of the supplemental priorities published in the Federal Register on December 20, 2014 and no additional changes may be added at this time.

Change: In the Notice Inviting Applications (Notice), the Department will include a note to the definition of Military or Veteran-Connected Student, which states that for the EOC Program, only subpart (b) of the definition—"A student who is a member of the uniformed services, a veteran of the uniformed services, or the spouse of a service member or veteran"—applies. The Department will also include a note stating that "students" in this definition includes prospective students.

Comment: Another commenter questioned how applicants proposing to serve communities without a military presence would address the priority, and whether they would not receive points if the priority is not addressed.

Response: It is not the Department's intention to disadvantage any applicant; however, if an applicant is unable to or does not address the priority, additional points cannot be awarded. The

CPP does not require a military presence in the target area proposed by applicants, only individuals in the target area who are military- or veteran-connected.

Change: No change.

Comment: One commenter stated that the CPPs are no longer optional for applicants due to the competitive nature of the competitions and that including the CPPs diminishes the value of the prior experience (PE) points.

Response: As previously stated, it is not the Department's intention to disadvantage any applicant. The Department believes that the EOC program provides services for adults which are crucial to helping more participants enroll and succeed in higher education. The CPPs were designed with the intent for applicants to develop and/or expand on existing plans that would increase the likelihood that participants would enroll in a postsecondary institution. The Secretary believes that it is critical that grantees identify and implement strategies that effectively support disadvantaged adults. In addition, PE points are established in statute and the Department does not have the authority to change the point value assigned or eliminate their use.

Change: No change.

Quality of Project Design

Comments: Many commenters expressed concern regarding the newly added criterion, Quality of Project Design, which utilizes strong theory and logic models. Commenters stated that more information on what would constitute strong theory is needed from the Department.

Commenters stated that this new criterion is not in the Code of Federal Regulations – 34 CFR Part 644. Some commenters believed it should not have been added to the selection criteria outlined in the EOC application package as this did not go through the negotiated rulemaking process. In addition to this, commenters were concerned that the criterion is worth an additional five points, which changes the total score for the selection criteria from 100 points to 105 points; some argued that the Department did not have authority to change the total points assigned to the selection criteria.

Commenters referenced that a budgetary constraint of a $300 per-participant cost would not allow sufficient funds to address the activities needed to support the evaluation activities surrounding a logic model.

Furthermore, commenters stated that this new criterion must be addressed in the project narrative but applicants are not allowed additional pages in which to respond. Two commenters wanted to know if the logic model could take the place of other activity flowcharts including resources needed, timelines, staff responsibilities and benchmarks, since information for these items take up significant space and could be seen as redundant.

Lastly, a commenter stated concern that the selection criterion referenced that a logic model is required for a project design, but that the components of the logic model were not provided, and where to place the logic model within the application is not provided.

Response: The Department sees great value in applicants developing logic models to spell out the various components of their proposed interventions, and the relationship between project components and key outcomes; and it does not believe the addition of the Quality of Project Design criterion will overly burden applicants. The Department provides a detailed definition for logic model, also referred to as a theory of action, in the application booklet; this description is designed to help provide guidance to applicants when addressing this criterion. The Department has also included a link to the Institute for Education Sciences, which provides detailed information regarding the development of logic models. That information may be found at: http://ies.ed.gov/ncee/edlabs/regions/pacific/pdf/REL_2014007.pdf.

The Secretary is sensitive to the adjustments that projects may need to make in determining their proposed processes, but believes that the target population is better served and the likelihood of success is increased when projects have identified key components of the proposed process and described the relationship between key components of services and their desired outcomes.

The program regulations for the EOC Program do not preclude the Department from including an additional selection criterion without negotiated rulemaking, nor does it preclude assigning weight for new selection criteria. The regulations governing the EOC program include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 75 (except for 75.215 through 75.221). Subpart 75.209 states that the Secretary may use any combination of the types of selection criteria listed to evaluate an application under that subpart. In addition, Subpart 75.210 states that in determining the selection criteria to be used in a grant competition, the Secretary may select from any combination of criteria listed under that subpart. Thus, the Secretary may include selection criteria in program-specific regulations and selection criteria established listed under subpart 75.210. Subsection 75.210 (c) lists the Quality of Project Design criterion. The Department cannot eliminate any selection criteria that have been mandated by statute or program regulations, but can add selection criteria as outlined in Subpart 75.209 and 75.210. Weight can also be assigned by the Secretary.

As the newly proposed criterion is consistent with the Department's increasing emphasis in recent years on promoting evidence-based practices, the Department will include this new criterion worth a total of five points in the final Notice. The Department believes that a 60-page maximum is sufficient for the application narrative (Part III of the application); therefore, the Notice will reflect that the application narrative (Part III of the application) is limited to a maximum of 60 pages.

The logic model is part of the Quality of Project Design and should be included when addressing this selection criterion. The logic model should not take the place of other information provided in regards to other activity flowcharts, including resources needed, timelines, staff responsibilities and benchmarks, since this information is needed to address and receive points for other selection criteria.

The Quality of Project Design is worth a total of five points. With the addition of this selection criterion and the weight assigned, the total score that an application can receive for the selection criteria has changed from 100 points to 105 points for the FY 2016 EOC program competition.

The Department recognizes that the Federal funding may not be sufficient to support all the services or activities that EOC participants need or the project administration needs; and, therefore, we encourage projects to continue to coordinate project services with other community resources.

Change: No change.

Objectives

Comments: Two commenters expressed concerns stating that the ordering and wording of the objectives are different on the EOC Profile Form then in the Notice. Commenters noted that the guidance provided states that the objectives cannot be rewritten, restated or reworded and request clarity as to what is the appropriate ordering and wording of the objectives.

Response: The correct ordering and wording of the objectives are shown on the Educational Opportunity Centers Programs Profile form.

Change: No change.

Comment--Objective #1—Secondary school diploma: One commenter requested that the time period for participants to successfully enroll in postsecondary education, rather than the time to complete a secondary diploma or high school equivalency and to enroll in college, be used as an objective. This is due to the fact that loan default counseling for the purpose of college re-entry, which is a significant need, is very complicated for participants and requires a significant amount of time; therefore, the commenter believes that it should be included as an outcome objective.

Response: Section 402A(F)(3)(i-iv) of the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act, requires the Department to use the outcome criteria outlined in the section. No additions may be added.

Change: No change.

Comment: One commenter requested the elimination of participants that have an educational status of high school non-senior (9th-11th grade) from the denominator; stating that graduation is not possible until the senior year.

Response: Although the EOC program primarily serves adults (e.g., 19 and older), we know that many EOC projects provide services to high school students if there is no Talent Search project in the target area. Therefore, the denominator for this objective would include all EOC participants served during the project year who did not have a secondary school diploma or its equivalent at the time of first service. Therefore, high school students served during the project year would be included in the denominator.

Change: No change.

Comment: Another commenter requested that the Department address the definition of "potential transfer student." The commenter stated that EOC regulations are designed to provide assistance for individuals who desire a program of postsecondary enrollment; however, the commenter would like for services provided to individuals who transfer from two-year to four-year institutions to count towards success for the enrollment objective.

Response: Section 402A(F)(3)(i-iv) of the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act, requires the Department to use the outcome criteria outlined in the section. No additions may be added.

Change: No change.

Comment: One commenter stated that the wording for the postsecondary education enrollment objective is not congruent with the wording for the postsecondary enrollment objective as stated in the FY 2011 EOC grant application package, which states "will enroll in a postsecondary education program during each project year (or by the end of the next fall term)"; however, the EOC Program Profile's wording says that the student "will enroll in a postsecondary education program immediately following participation in an EOC Program or will have received notification by the fall semester."

Response: The wording, as reflected on the EOC Profile, for the Postsecondary Education Enrollment objective has changed from the last competition held in FY 2011. The Secretary, as allowed by the program regulations, has established the timeframe as immediately following participation in an EOC program, for a specific point of measurement.

Change: No change.

Comment: Another commenter suggested that we modify the financial aid application objective to include participants who will "apply for student loan deferment, apply for loan forbearance, or apply for debt relief based on closed school debt status or borrower defense to repayment" during the project year. The commenter stated that the Department should include those participants because EOC projects spend a significant amount of time working with individuals who participated in the Federal Student Loan Programs. The commenter stated that EOC programs have a duty to assist these individuals and do so. However, this work is not measured under the current objective. Additionally, by modifying this objective, the legislative purpose of assisting those currently enrolled in postsecondary will be addressed to a certain extent, which is currently not addressed.

Response: The Secretary recognizes the concern of the commenter; however; the EOC regulations, 644.21(b), specifies the objectives designated to evaluate EOC projects, which is assisting participants in applying for financial aid by completing the financial aid application.

Change: No change.

Project Narrative Page Limit

Comment: Several commenters expressed concern regarding an inconsistency in the guidance provided regarding the maximum page limitation for the application narrative (Part III of the application). Commenters noted that one section of the application package cited a 60-page limitation and another section cited a 50-page limitation.

Response: We agree with the concerns expressed regarding the inconsistent guidance provided for the maximum page limitation of the application narrative (Part III of the application). The EOC application package will be revised to reflect throughout that the application narrative (Part--III of the application) is limited to no more than 60 pages.

Change: As previously stated, revisions to the EOC application package will reflect throughout that the application narrative (Part—III of the application) is limited to no more than 60 pages.

Project Narrative Formatting

Comment: Several commenters expressed concern regarding an inconsistency in the guidance provided regarding the formatting of titles, headings, footnotes, quotations and references for the application narrative (Part III of the application). Commenters noted that there were two pieces of formatting guidance provided: one that stated that titles, headings, footnotes, quotations and references should be double-spaced; and another piece of guidance that stated that they should be single-spaced. The commenters requested clarity regarding text in figures, charts, and graphs; whether they are single-spaced; and the font size. Another commenter requested that the formatting limitation be suspended for the logic model due to the fact that logic models provide a one-page visual diagram of the flow of the major components of the program; thusly, spreading that diagram across several pages will make it difficult to read.

Response: We agree with the concerns that have been expressed regarding the inconsistent guidance provided regarding the formatting of titles, headings, footnotes, quotations, references and captions. Revisions to the EOC application will reflect throughout the application package that titles, headings, footnotes, quotations, references and captions, as well as all text in figures, charts and graphs, may be single-spaced. In addition, the font-size for the application narrative (Part—III of the application package) is to be either 12 point or larger, or no smaller than 10 pitch (characters per inch).

The Secretary recognizes the concern of the commenter that the formatting limitation be suspended for the logic model due to the fact that diagrams tend to spread across several pages. However, the Department has established set parameters in order to ensure formatting consistency for applications submitted to the Department, and the font size requirement established cannot be altered. However, since the logic model diagram would be considered a figure or chart, the text included therein may be single-spaced.

Change: Revisions to the EOC application package will reflect throughout the application package that titles, headings, footnotes, quotations, references and captions, as well all text in

figures, charts, and graphs, may be single-spaced. In addition, the application package will be revised to reflect that the font-size for the application narrative (Part—III of the application package) is to be either 12 point or larger, or no smaller than 10 pitch (characters per inch).

Number of Participants

Comment: Two commenters expressed concern about the minimum number of participants a project must serve. One commenter wanted the Department to reduce the minimum number of participants from 1,000 to 800 because it is difficult for projects in rural communities to serve 1,000 participants each budget year. One commenter from a small rural community had a concern that serving a minimum of 1,000 participants could present a hardship and wanted to know what small rural communities do to obtain the required number of participants.

Another commenter requested a lower minimum number to serve because the Postsecondary Enrollment objective will include lower outcomes, due to the fact that the percentage of EOC adult project participants yields a lower outcome than high-school-aged participants, and requiring projects to serve at least 1,000 participants each budget year does not lend sufficient time for projects to build the relationships needed with participants to allow for a higher postsecondary enrollment rate percentage.

Response: We believe it is appropriate for the Secretary to identify the minimum and maximum grant award amounts and minimum number of participants a project must serve each year of the grant cycle in the Notice. This practice gives the Department the flexibility to establish the minimum number of participants to be served based on the available resources and other priorities for each competition, and to adjust these numbers for subsequent competitions based on our experience, changing priorities, and cost analysis. The Secretary recognizes the challenges presented by the commenters, but believes that, in order to ensure that the program assists as many participants as possible in enrolling in postsecondary education, the minimum number of participants that projects are required to serve should remain at 1,000 participants. The Secretary reminds small rural communities to consider increasing their target area. The regulations do not require that applications include only one target area.

Change: No change.

Cost Per Participant

Comment: One commenter expressed a concern that the maximum award guidance indicated in the application for new applicants and currently funded EOC projects is unclear.

Response: For the FY 2016 competition, for an applicant that is not currently receiving an EOC Program grant, the maximum award amount is $230,000 to serve at least 1,000 participants at a per-participant cost of $230.

For an applicant that is currently receiving an EOC 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. The minimum number of participants an applicant proposes to serve must be 1,000. For an applicant that is currently operating an EOC project serving more

than 1,000 participants, the applicant is encouraged to continue to serve its current number of participants. However, if the applicant proposes to reduce the number of participants to be served, the proposed number must be at least 1,000 participants and must be based on a per-participant cost that does not exceed $300 per participant.

Change: No change.

General Comment

Comment: One commenter wanted to know if applicants will have 90 days to submit the application or 60 days as stated in the Notice.

Response: The Department cannot, at this time, provide the exact number of days that applicants will have to submit the application. However, it is the intention of the Department to provide at least 60 days before the deadline for transmittal of the application.

Change: No change.