

Department of Education

Request for Comment: Ronald E. McNair Postbaccalaureate Achievement Program Annual Performance Report, Docket ID, ED–2016–ICCD–0072

Field 32a-g, Research Benchmarks

Field 33a-g, Other Scholarly Activity Benchmarks

Field 34a-g, McNair Research Internship Benchmarks

Taken as a whole, the effort to identify specific parts that constitute research may be a good idea, but as with many things, the devil that is in the details raises problems that limit both the ability to report and usefulness of what is reported. First, it is unclear that the Department needs the information to provide effective oversight of McNair programs. To the extent that the Department wishes to see what each program does (34a-g), there may be merit in gathering some of this information, but the limitations of the proposed benchmarks runs counter to the Department's own guidelines issued in 2010. At that time, the Department noted that many things could be included in research and scholarly activities. Unfortunately, the existing list seems to limit the idea of "many things" to mean only a few. Even within those few issues, a problem remains with the benchmark "Published Research Paper" (32f, and 34f). Certainly publication is a desirable goal, but it does not happen within the bounds of a summer research project. Publication may happen as part of Other Scholarly Activities (benchmark 33f), but given the time necessary for peer review, it is equally likely that publication may not happen until a McNair participant has completed a bachelor's degree and moved on to graduate school. A more meaningful benchmark would be something such as "submitted a paper for publication" because that is indeed a scholarly activity regardless of whether the paper is published.

The Research Benchmarks listed in 32a-g are the same as those listed for the McNair Research Internship (34a-g), but problems increase for the Research set. A McNair participant may be involved in an REU at a distant university or even deeply involved with sophisticated research at our own university. As directors, we are unlikely to know exactly what the students are required to do, but that does not mean that the students are not involved in meaningful research that may lead to publications. Whatever publications result from the research will be related to the timeline of the lab and the publication cycle, rather than a particular set of a few benchmarks. Given those realities, the set of benchmarks is too narrow and too limiting. There seems to be no reason for the Department to need information about activities that REUs or labs might do to advance various research agenda or even to give undergraduate students exposure to quality research experiences. Moreover, many REUs are funded by grants from NIH or NSF, sources that the Department of Education does not oversee. For that reason too, it remains unclear why the Department would need the information or what the Department would do with the information it obtained. Once again, the narrowly defined set of benchmarks conflicts with the Department's 2010 assessment that research may include a wide variety of activities.

Given the Department's view that scholarly activities can include many things, the limited list offered as the set of benchmarks for Other Scholarly Activities (benchmarks, 33a-g) are simply too limited to achieve whatever broad purpose the Department might hope to achieve. As a consequence, because it remains unclear why the Department wants the information, and how the Department would use the information, I suggest that all three sets of benchmarks (32a-g, 33a-g, and 34a-g) be omitted from the performance report.

10/24/16

Comments on revised draft of proposed changes to the McNair APR

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Thank you for the opportunity to comment on the revised draft of proposed changes to the McNair APR. I appreciate the Department's responsiveness to the concerns expressed by the McNair community, particularly with regard to Fields 32, 33, and 34 on Research or Other Scholarly Activities.

I also acknowledge that the Department would like to "gain a more holistic understanding of how projects operate" by collecting information on benchmarks related to research and other scholarly activities. However, it is concerning to many of us to collect such information on our reporting document. As I mentioned in a phone conversation with Julie Laurel, perhaps the Department and McNair staff could collaborate with either the Council of Graduate Schools or the Council for Opportunity in Education to design and administer a survey that would provide the type of information the Department seeks. There are a number of seasoned McNair professionals who would very likely be willing assist either organization with such a project, myself included.

Field 29 Graduating Cohort Year: I noticed that there is a typographical error in the Note to this field. Currently, it reads: "For example, if the participant earned a bachelor's degree (or equivalent) on May 15, 2007, then the participant's bachelor's degree cohort year is option 5 (2006-07)...." This should actually be **option 6** for 2006-07. Also, the (mark is missing from in front of the word "or."

Thank you again for the opportunity to respond to the Draft McNair APR.