

**Student Support Service (SSS) Program
Summary of Public Comments on Proposed Changes to the
2016-17 (SSS) Annual Performance Report (APR)
Following 60-Day Review Period**

On July 29, 2016, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the [Federal Register](#) inviting comments by September 27, 2016, on the proposed annual performance report (APR) for the Student Support Service (SSS) Program. The Department received comments from twenty six (26) individuals. The majority of the comments were related to the new data fields proposed specifically the fields related to research and other scholarly activities. To this end, the Department reviewed each of the comments and concerns and provided responses as well as made revisions to the APR, where applicable.

Below are a summary and discussion of the comments on the proposed SSS APR as well as the information on the actions taken follows. Some minor changes to the APR that are of a technical nature (e.g., typographical errors) are not discussed below but have been made to the revised form and instructions.

Standardized Objectives

Comments: Commenters expressed concern that it is sometimes in the student's best interest to transfer before getting an AA degree, particularly since many four-year institutions will not take some types of two-year transfer credits, such as STEM, Music, and Art credits. Requiring a degree or certificate before transfer for this objective creates a disincentive to accept students who are in programs where acquiring an AA degree before transfer is not in the student's best interests, such as the fields cited above.

Commenters also suggested that transfer students should count toward a grantee's persistence objective, even if they transferred without a degree, as these students are continuing their studies and making progress toward a degree.

Discussion: The standardized objectives are written to capture the level of a grantee's achievement relative to persistence, degree completion and degree completion and transfer from a two-year to a four-year institution. The criteria regarding the standard objectives is very explicit – in order to be counted as a positive outcome for the purposes of PE, the student must either (1) attain a degree/certificate at the grantee institution or (2) attain a degree/certificate and transfer to a 4-year institution or four year program during the academic year or by the fall of the next academic year. Students served by 2-year institutions only, do count towards the persistence objective if (1) they continue to be enrolled at the grantee institution in the fall of the next academic year, (2) they attained a degree or certificate during the reporting period at the grantee institution, (3) they attained a degree or certificate from the grantee institution and transferred to a 4-year institution or four year program by the fall of the next academic year, or (4) transferred from the grantee institution to a 4-year institution or four year program by the fall of the next academic year.

The statute is very explicit regarding transfers—only 2-year institutions are eligible for the transfer criterion. Thus, the Department designed the annual performance report so that the level of attainment of the graduation and transfer objectives are captured and evaluated separately for two-year institutions. While the Department recognizes that some students transfer before obtaining an AA degree or certificate, grantees can only be held accountable for reporting on students that were enrolled in the grantee-institution during the performance year. We encourage projects funded at two-year institutions to establish a level of achievement for transfer taking into consideration the anomalies that may occur based on the pool of eligible students identified at their institution.

Action Taken: None

Comments: Some commenters requested that students who leave the SSS project in order to enroll in a McNair project at the same campus should continue to be reported by SSS for persistence, good academic standing, and graduation. If the student has not yet graduated but cannot count for the program's objectives, it appears as if the student has become inactive.

Discussion: Persistence and good academic standing objectives are statutorily program-specific and are calculated based on the participants served that year; therefore, students who no longer participate in the SSS project cannot be included as having persisted regardless of whether they were served by another TRIO program.

Action Taken: None

SECTION I, Part 2—Project Services

Competitive Preference Priorities

Comments: Some commenters believe that it is too soon for the Department to ask for results on CPP's. They say that during this first grant cycle, grantees are trying to establish baselines so that differences can be measured. Therefore it does seem appropriate to ask how many participants received the services outlined. Commenters say it won't be until next year's APR that they can statistically measure the differences and report results.

Discussion: The Department agrees that collecting information on the CPPs is not appropriate for the reason mentioned above; therefore, in 2015-16, the Department did not collect this information. The Department does agree with the respondents that the CPP information would be more relevant if collected beginning in reporting period 2016-17.

Action Taken: The collection of CPP information will appear on the 2016-17 SSS APR.

Comments: One commenter requested that we clarify information that the Department wants programs to report for CPPs.

Discussion: The Department agrees with the commenter and as such additional instructions have been added to the Competitive Preference Priorities (CPPS) section.

Action Taken: The following information will be collected by the department: 1. If your project earned points for competitive preference priority #1, please enter the number of students who received the intervention _____.1a. Please describe what activities your project enacted in order to develop non-cognitive skills. 2. If your project earned points for competitive preference priority #2, please enter the number of students who received the intervention _____. 2a. Please describe what new, additional, or modified activities your project enacted to provide individualized counseling.

SECTION II: PARTICIPANT RECORD STRUCTURE

Field #29 Reason for Withdrawal or Not Returning

Comments: One commenter requests that (Field 29) the "Reason for Withdrawal or Not Returning" add an additional field option (maybe "9" or "99") where grantees could indicate that a student is still enrolled, however receiving services from other retention programs.

Discussion: Per longstanding reporting policy, field 29, "Reason for Withdrawal or Not Returning" strictly assesses whether the student is still enrolled at the grantee institution; therefore, the field does not relate to whether the student withdrew from the SSS program.

Action Taken: None

Field #37 Participant Name Change

Comments: Some commenters noted that the name change field was a prudent addition to the APR. The commenters recognized that names generally change through, for example, a change in marital status; therefore, commenters were in agreement with the addition of the data field name change as it would allow grantees to continue to accurately track their students.

Discussion: The Department agrees that the name change field is necessary for the accurate tracking of participants.

Action Taken: None

Field #38 Case Number

Comments: Some commenters noted that a Case Number is a duplication of the use of the (SSN) social security number and expressed that there would be additional burden on programs to track another data field. Others noted that they didn't understand the process that the department was going to utilize to ensure that current and new participants received Case Numbers.

Discussion: The introduction of the student case number (SCN) is to address continuing security concerns regarding the collection of the social security number (SSN). It is TRIO's goal to phase out the SSN in future reporting periods and instead use the SCN to track students. The SCN is a unique randomly generated number which has been used internally by TRIO to, for example, merge APR data with the SSS longitudinal file.

Beginning in 2016-17, TRIO will test the feasibility of utilizing the SCN to track students for the SSS program only. Should this process prove to be viable, TRIO will then fully implement the SCN for the remaining TRIO programs that collect TRIO student-level data and will no longer collect the SSN. During the 2016-17 SSS data collection period, TRIO will provide the 2015-16 APR data file which will contain the SCN for every record that needs to be on the 2016-17 APR data file. For new participants, TRIO will randomly generate a SCN at the time the grantee uploads their data. The purpose for implementing the SCN is to develop safeguard for students' information.

Action taken: None

Field #39 Deceased Participants

Comments: Some commenters have noted they see no real reason for the addition of field 39 where deceased persons are to be listed. They feel like field 29 "Reason for withdrawal" under item 7 - Not Applicable, participant was called to military or deceased is sufficient.

Discussion: Field 29 does not capture the information needed in order to accurately calculate PE for the completion objective. Note that field 29, option 7 not only contains the status for deceased students, it also contains the status for called to military service and ED does remove students from the cohorts who were called to military service.

Action taken: None taken.