

**Student Support Service (SSS) Program
Summary of Public Comments on Proposed Changes to the
2016-17 (SSS) Annual Performance Report (APR)
Following 30-Day Review Period**

On March 09, 2017, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by April 10, 2017, 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 Competitive Preference Priorities (CPP's) and Field 38 Case number. 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.

SECTION I, Part 1—Project Identification/Characteristics

IPEDS Unit ID

Comments: One Commenter believes that using IPEDS ID does not provide data verifying "need" in all instances- especially for 2 year colleges and non-research institutions that do not collect the data in a manner that corresponds to local need.

Discussion: The Department is not using the IPEDS ID to verify need for grantees. The IPEDS ID will be used to collect and analyze official statistics on the condition of education each grantee provides using the SSS program.

Action Taken: None

SECTION I, Part 2—Project Services

Competitive Preference Priorities

Comments: Some commenters believe that the Department did not communicate an expectation about quantifying the material in the CPPs when the proposals were being written. Other commenters say that there was no assertion by the department that there would be a measurement instrument to verify the additions and changes proposed in the CPP section. Commenters also say there is no description of how this section will be evaluated and scored, and there are no real instructions included. One commenter requested that we clarify information that the Department wants programs to report for CPPs.

Discussion: The Department has added additional instructions 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. Section II, Field 38 Case Number - It's unclear how the addition of this new field would be implemented. How would new participants get case numbers? Also, any TRIO generated numbers assigned to current and prior year participants would need to be provided to programs well in advance of the APR release, so those who use database to store participant data have time to modify their systems to accept and report and test the Case Number. This field would produce unnecessary hardships on programs, as most programs and universities already have ways to uniquely identify their students.

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.