

Upward Bound Math and Science Program – 2017 Competition Summary of Public Comments with Responses

Introduction

The U.S. Department of Education (Department) received 19 comments regarding the Upward Bound Math and Science (UBMS) Program competition. The commenters addressed four broad areas with the majority of comments expressing concern regarding the formatting requirements of the application narrative, including the page limit. Additional areas of some concern to the commenters were the competitive preference priority, the Need section of the selection criteria and stipends. The Department also received a comment requesting an increase in funding for the UBMS Program.

Below is a summary of the comments and the Department’s responses to the comments including whether subsequent changes have been made to the Notice Inviting Applications (Notice) and the application package for new awards for FY 2017.

Formatting of Application Narrative—Double Spacing of Charts, Tables, Figures and Graphs

Comments: The majority of commenters expressed concerns about the change in formatting requirements for the application narrative. The particular change in formatting requirements stipulates that all text in the application narrative including charts, tables, figures and graphs must be double spaced. Titles, headings, footnotes, quotations, references and captions may be single spaced. Several commenters stated that in previous TRIO grant competitions, applicants were able to single space charts, tables, figures and graphs.

Commenters expressed concern that the new formatting requirement would limit the amount of available space for adequately addressing the requirements in the UBMS application package, such as including details specific to robust math and science programming. Commenters also stated that single spaced charts, tables, figures and graphs may have greater clarity for reviewers of the UBMS application narrative.

One commenter wanted to know if a list of references or bibliography was needed, if so, it should be single spaced.

Several of the commenters suggested that the Department increase the page limit of the application narrative, so that applicants can adequately provide critical content. Commenters stated that with the current formatting requirement and the 65-page limit, it will be difficult to include all of the information and data needed for reviewers to assess.

Response: The Department is aware of the concerns of prospective applicants regarding the proposed change to the formatting requirements. However, the Department believes that the grant process is competitive and should be equitable; therefore, in order to ensure that applicants that include an inordinate amount of text in charts, tables, figures and graphs do not gain an advantage over applicants that do not engage in such practices, the Department is requiring double spacing of the application narrative, including charts, tables, figures and graphs.

References are usually included by applicants in the application submitted; however a bibliography is not required, if a reference is provided, it may be single spaced as stipulated in the Notice.

The Department established the number of pages for the application narrative for UBMS from 60 to 65 pages based on comments received during the public comment period for the FY 2017 Upward Bound competition. To ensure that data provided is clear and concise, the Department does not agree with the commenters regarding the necessity to increase the page limit.

Change: None.

Competitive Preference Priority

Comments: Two commenters expressed concern regarding the competitive preference priority. One commenter stated that the inclusion of the CPP reduces the value of prior experience (PE) points and detracts from the intent of the TRIO legislation. Another commenter stated that they do not understand the rationale for the CPP.

Response: The Department does not agree with the commenter regarding the statement that the CPP reduces the value of PE. An application may receive an additional three points based on the quality of the response to the CPP. The CPP score is added to the application's score for the selection criteria and the up to fifteen PE points an application may receive, if it is from a current grantees

The CPP was designed to incentivize applicants to provide evidence-based programs that increase the likelihood that students complete high school, enroll in and complete postsecondary education. The CPP encourages applicants to focus on promising strategies that have been the subject of research and have demonstrated positive impacts in evaluations of such interventions. The CPP enhances the effectiveness of grant competitions and facilitates the improvement of outcomes for students participating in a UBMS project. Applicants will receive additional points for addressing some of the challenges that face UBMS-eligible participants in innovative ways with the ultimate goal of better meeting UBMS program goals. Lastly, the Office of Management and Budget (OMB) has issued guidance to federal agencies outlining how federal agencies might move forward to advance the use of evidence in programs. The Department's action in this regard, is consistent with guidance provided by OMB.

Change: None.

Need Section--Selection Criteria

Comment: One commenter suggested that the UBMS application be updated to reflect the four sub-criterion for UBMS and not the six UB sub-criterion per 34 CFR 645.31 (a) (2).

Response: We agree with the commenter and will correct the Need section to reflect the four sub-criterion for UBMS.

Change: The Need section of the selection criteria within the UBMS application will reflect the following:

(i) The extent to which student performance on standardized achievement and assessment tests in mathematics and science in the target area is lower than State or national norms.

(ii) The extent to which potential participants attend schools in the target area that lack the resources and coursework that would help prepare persons for entry into postsecondary programs in mathematics, science, or engineering;

(iii) The extent to which such indicators as attendance data, dropout rates, college-going rates and student/counselor ratios in the target area indicate the importance of having additional educational opportunities available to low-income, first-generation students; and

(iv) The extent to which there are eligible students in the target area who have demonstrated interest and capacity to pursue academic programs and careers in mathematics and science, and who could benefit from an Upward Bound Math and Science program.

Stipends

Comments: One commenter was concerned that stipends may not be allowed because the instructions for the *Budget Summary and Itemized Line Item Budget* state that training stipends are not applicable.

Response: In accordance with the UBMS regulations, stipends and room and board are applicable under UBMS. The Department will correct the reference to training stipends in the UB application package.

Change: The following change has been made in the application: “Training Stipends: Provide the cost for student stipends and room and board”.

Funding for the UBMS Program

Comment: One commenter expressed concerns regarding funding for UBMS and requested an increase in funds.

Response: The Administration has requested \$900,000,000 for the Federal TRIO Programs for FY 2017, of which we intend to use an estimated \$44,000,000 for UBMS awards. The actual level of funding, if any, depends on final congressional action. If additional funds are appropriated by Congress, the Department will determine the allocation of the increase in funding at that time.

Change: None.