Veterans Upward Bound Program – 2017 Competition Summary of Public Comments with Responses

Introduction

The U.S. Department of Education (Department) received 11 comments regarding the Veterans Upward Bound (VUB) Program competition. The majority of the comments expressed concern regarding the formatting requirements of the application narrative, including the page limit and logic model. Additional areas of some concern to the commenters were stipends and the maximum award amount for current grantees that plan to reapply for new awards.

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 and the application package for new awards for FY 2017.

Formatting of Application Narrative—Double-Spacing of Charts, Tables, Figures, Graphs, Logic Model and Page Limit

Comments: The majority of commenters expressed concerns about the change, since the FY 2012 competition, in formatting requirements for the application narrative and page limit. 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. Commenters also expressed concern that the new formatting requirement would limit the amount of available space for adequately addressing the requirements in the VUB application package, such as addressing the Quality of Project Design and including a well-developed logic model.

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 present thorough information about the need, plan, and objectives for the proposed project. Commenters requested that the page limit be increased to 70 pages.

Lastly, a commenter asked if the double-space requirement applied to the logic model and if the orientation of the logic model, tables, and charts can be in landscape or portrait on a page.

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, graphs and the logic model.

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.

Regarding presenting tables, charts and the logic model in landscape or portrait orientation, the Department has not stipulated a certain orientation requirement. However, regardless of the orientation used, applicants should adhere to the 1" inch margins at the top, bottom, and both sides, requirement for the application narrative.

Change: None.

<u>Stipends</u>

Comments: One commenter was concerned that the allowable monthly stipend of \$40 does not fully take into account the lives of veteran students and the competing priorities that students experience. The commenter suggested that the stipend increase to \$250.

Response: The amount allowable for VUB stipends was established by the VUB Program regulations. The Department does not have the authority to increase the amount stipulated in the regulations.

Change: None.

<u>Maximum Award</u> (For an applicant currently receiving a VUB Program Grant)

Comment: One commenter expressed concerns regarding the maximum award amount that currently funded grantees may request. The commenter questioned whether the base award amount of funding represented the amount of funding that was received for the first year of the project or the amount of funding the project received in FY 2016.

Response: For an applicant that is currently receiving a VUB Program grant, the maximum award amount is an amount equal to the applicant's base award amount for FY 2016 (to continue to serve at least the same number of participants that was approved for the current grant). The base award amount represents the funding a grantee was eligible to receive in FY 2016 before any reductions, if necessary, for a large carryover balance of funds from the previous budget period.

Change: None.