

The Department received one comment regarding the tracking of participant in postsecondary and the statement that no grantee should be denied continued funding as long as the project makes reasonable efforts to report on findings. The commenter also recommended that the Department allow projects to submit reasonable estimates when exact data are not available, so long as the estimates are based on experience and historical knowledge.

The Department assumes that, in referring to continued funding, the commenter is referencing prior experience (“PE”) points that projects may earn for accomplishing certain objectives at or above the level established in our grant competitions. These points are added to panelists’ scores from a grant competition to arrive at a total score.

Five separate objectives are involved in earning prior experience points. The two that involve prior participants measure postsecondary enrollment and postsecondary completion. Regarding the postsecondary enrollment objective, the two-year period that the Department uses (previous year and current year) was suggested by the public during the comment period for TRIO’s regulations, which may be found at <https://www2.ed.gov/programs/triovub/legislation.html>

The timeframe used for the postsecondary enrollment and completion objectives is known to applicants when they submit their grant applications. Applicants propose their own targets for these objectives; when they do so, they are free to take into consideration the difficulties they may encounter in tracking prior participants.

No further actions will be taken by the Department in response to this comment.