

Talent Search (TS)
Summary of Public Comments on
Proposed Changes to the 2016 Annual Performance Report (APR)
Following 60 Day Review Period

On May 4, 2017, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by July 3, 2017, on the proposed annual performance report (APR) for the Talent Search (TS) program. Thirteen respondents submitted approximately 36 individual comments (i.e., multiple comments from respondents). Most of the commenters expressed some concerns about the amount of data requested on the form and instructions for “Dual Enrollment” and the “undue” burden this places on TS grantees. Also, some of the commenters expressed concerns about the language presented in the Competitive Preference Priorities (CPP) section. The Department reviewed each of these concerns and where necessary, made changes to the form and/or instructions. A summary and analysis of the comments as well as information on changes to the proposed TS APR in response to these comments follows. Suggestions for minor changes (generally those of a technical nature) are not discussed below, but in response to those suggestions, some clarifications and technical alterations have been made in the revised form and/or instructions.

1. APR FORM AND INSTRUCTIONS

**Section II: Demographic Profile of Project Participants
and Listing of Target Schools**

Comments: A respondent recommended adding on the APR form and instructions, in Section II, D (Participant Distribution by Gender), "Unknown" or "Unspecified" as an option. The respondent expresses concern that participants knowingly or unknowingly do not complete this section in the application. Including this option would allow for a status to be reported for all participants as counted in A3.

Discussion: The Department disagrees with this recommendation. Instructions outlined in the TS APR Instructions booklet for Section II, D (Participant Distribution by Gender) state, “Though these data are not mandatory, they are helpful to the Department in reporting on the gender representation of project participants.” Because this information is not mandatory, the Department will make sure that the reporting tool allow for projects to submit the TS APR who opt not to address Section II, D (Participation Distribution by Gender).

Action Taken by ED: In the TS APR instructions, the wording in Section II, D #3 (Total) has been revised to state, “If addressed, the total should agree with the number in A3.”

Comments: Several commenters expressed concern that for both section II, H (Participants in Dual Enrollment Programs) and section II, M (Target Schools), steps to collect this data on the number of participants who receive college credit from the dual enrollment program is a labor

intensive process that involves additional paperwork burden and diverts significant time away from providing direct services for our participants and staff cannot easily access this information from target high schools due to FERPA law. Commenters recommend that TS should not be in charge of collecting this data.

Discussion: As part of the Higher Education Act (HEA) as reauthorized under the Higher Education Opportunity Act (HEOA) of 2008, TS regulations require all grant recipients to provide services that encourage “student enrollment in rigorous and challenging curricula and coursework, in order to reduce the need for remedial coursework at the postsecondary level.” For a number of TS projects, the only opportunity for their students to participate in a rigorous course of study may be through a dual enrollment program at the local institution(s) of higher education. The Department is interested in capturing data related to low-income students and the impact of dual enrollment on reducing cost as well as time-to-completion for low-income students earning a degree. All grantees are required to keep records on the services provided to participants each year. This includes those dealing with rigorous curricula that may or may not involve dual enrollment opportunities provided to participants. In addition, the question of who pays for the services is needed to address the regulations dealing with costs allowable using grant funds. Not all costs related to rigorous programs of study may be paid for using grant funds (see § 643.30 “What are allowable costs?”).

Action Taken by ED: No change.

Comments: Several commenters proposed that the Department amend the TS APR form Section II, K (FAFSA Completion) #3 to read, “Seniors who did not complete the FAFSA and/or whose FAFSA completion could not be confirmed.” Commenters also proposed to change the APR instructions to coincide with the TS APR form by adding the following language, “and/or the number of participants whose applications for federal aid during the reporting year could not be confirmed” to the current instructions content. In addition, commenters recommended changing the wording in Section II, K (FAFSA Completion) #4 to read, “Total (must equal seniors from Section III, A5).” The commenters thought this addition would provide more accurate reporting on seniors since it is not always possible to obtain proof that a senior has completed the final submission of the FAFSA.

Discussion: The Department agrees with the concerns raised by the commenters.

Action Taken by ED: Section II, K #3 has been revised to state, “Seniors who did not complete the FAFSA and/or whose FAFSA completion could not be confirmed.” Also on page 9, Section II, K of the instructions, the following language has been added to the last sentence of the first paragraph: “...and/ or the number of participants whose application for federal financial aid during the reporting year could not be confirmed.” Section II, K #4 has been revised to state, “Total (must equal Section III, A5).” This language has also been added to the TS APR Instructions.

Comments: One commenter recommended inserting the abbreviation “CPP” in all four questions in Section II, L (Competitive Preference Priorities) on the APR tool to distinguish between CPP mentoring and tutoring services and non-CPP mentoring and tutoring services. The commenter expresses a concern that the current language could lead programs to report all tutoring or mentoring services, which could result in inaccurate data.

Discussion: The Department agrees with the commenter’s recommendation.

Action Taken by ED: Clarifying language was added to the APR form and instructions. Section II, L (Competitive Preference Priorities) of the APR form has been revised. All four questions now include the abbreviation “CPP” within each question. In addition, the APR instructions have been modified to clarify that projects are to report the number of participants that received CPP tutoring services only; CPP mentoring services only; both CPP tutoring and mentoring services; or neither CPP service.

Comments: Several commenters recommended not including a “Total” in Section II, L (Competitive Preference Priorities). For the CPPs, TS grants only indicated a percentage of participants to receive tutoring and/or mentoring services. The grant application did not indicate that all participants would receive one or both services.

Discussion: The Department agrees with the commenters’ recommendation.

Action Taken by ED: Upon review of commenters’ recommendations, we concur that “Total” should not be included in Section II, L on the APR form and instructions. Since the CPPs are not mandatory/a requirement to complete, “Total” has been removed from this section.

Comments: One commenter recommended separating the CPPs into separate questions. The commenter expresses concern that including tutoring and mentoring in the same option, would give the impression that seniors receiving tutoring and mentoring should only be considered. The commenter also mentioned that since the summer mentoring applies only to seniors, it would be beneficial to use the word “Seniors” within the answer options.

Discussion: The APR does allow for grantees to report on tutoring and mentoring CPP activities separately. Section II, L (Competitive Preference Priorities) of the TS APR instructions provides detailed instructions on how the CPP(s) must be completed, if applicable. The APR instructions specifically state, “In the FY 2016 TS grant competition, applicants could choose to respond to two competitive preference priorities under which projects would provide their participants with research-based academic tutoring and/or mentoring services. In this section, report the number of participants that received CPP tutoring services only; CPP mentoring services only; both CPP tutoring and mentoring services; or neither CPP service.” In addition, the APR tool lists four categories for reporting on CPP data: (1) Participants who received CPP tutoring services only, (2) Participants who received CPP mentoring services only, (3) Participants who received both CPP tutoring and CPP mentoring services, and (4) Participants who received neither CPP

service. CPP services may be offered to any participant regardless of participant's grade level. Therefore, the Department does not agree with the commenter's recommendations.

Action Taken by ED: No change.

**Section IV: Educational Status of Talent Search Participants
(at the end of the reporting period or the following fall)**

C. Postsecondary Education Enrollment

Comments: Numerous commenters pointed out on page 7, Section IV, C, an inconsistency in the last paragraph. The paragraph states to indicate on line three of the table the number of students with an unknown status. However, a line three does not exist in the table. The commenters recommended revising the language and reporting the number of students unknown in line two of the table.

Discussion: The Department agrees with the commenters' recommendation.

Action Taken by ED: The last paragraph of Section IV, C on the APR form has been revised with the following language: "Also indicate in line 2 the number of participants who, within the same timeframe, did not enroll (or did not receive notification of deferred enrollment) in PSE, and the number of participants with an unknown status."

E. Postsecondary Attainment; Subsection 1

Comments: One commenter does not understand the reason for having two interpretations for this objective in order to collect postsecondary attainment data.

Discussion: There is mainly no difference other than the random sampling procedure is designed to reduce, not increase, the burden on grantees by making allowances to only track a portion of postsecondary enrollees. Projects may follow the sampling guidelines discussed in the instructions or choose to track all postsecondary enrollees. However, the Department has noticed that a significant number of grantees from the FY 2011-2016 grant cycle opted to track all postsecondary enrollees.

Action Taken by ED: No change.

E. Postsecondary Attainment; Subsection 2

Comments: Several commenters noted that on page 19 of the instructions and page 10 of the form, for "Postsecondary Attainment; Subsection 2," the wrong year is being asked to be reported for the first postsecondary enrollment cohort. The information provided in the 2016-17 APR is referencing the first postsecondary enrollment cohort as 2012-13, which should be the 2011-12 cohort (seniors who graduated in May 2012 and entered postsecondary in the fall of 2012) and calculating six years later, which would be 2017-18 for in this section.

Discussion: The Department agrees with the commenters' recommendation.

Action Taken by ED: On page 19 of the instructions and page 10 of the form, for "Postsecondary Attainment; Subsection 2," the cohort year has been corrected to reflect 2011-12 as being the cohort to report on participants who attained at least one postsecondary credential within six years following graduation from high school.

Comments: One commenter recommends relabeling Postsecondary Attainment, Subsection 2 from 2012-13 postsecondary enrollment cohort to "the high school graduating class of 2012? This is common terminology and much clearer." Another commenter recommends relabeling this section "2012 High School graduates" since this is very clear and it is unclear the way it is currently stated in the draft APR.

Discussion: The Department recognizes the concern of one commenter that recommends clarifying the reporting year for Postsecondary Attainment. The commenter recommends referring to the first reporting year on Post-Secondary Attainment as "2012 High School graduates" since this is very clear and it is unclear the way it is currently stated in the draft APR: cohort (2012-2013). The Department has provided extensive instructions along with an example for completing this section as well as provided a chart with the year that coincides with the cohort that must be reported. In addition, the Department will be providing grantees with a list of participant names in the respective cohort a year in advance so that grantees may begin to compile the data needed for reporting on Postsecondary attainment. Therefore, the Department disagrees with this recommendation.

Action Taken by ED: No change.