

**Talent Search (TS)
Summary of Public Comments on
Proposed Changes to the 2016 Annual Performance Report (APR)
Following 30 Day Review Period**

On October 2, 2017, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by November 1, 2017, on the proposed annual performance report (APR) for the Talent Search (TS) program. Nineteen respondents submitted approximately 42 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, follow. 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

Definition

Comments: One respondent suggested that, in order to clarify which students should be identified as having participated in a dual enrollment program, the Department should ask projects to respond to a list of various programs and offerings, including dual enrollment, in which a student may have participated to earn college credit prior to high school graduation.

Discussion: In the Instructions for Completing the APR (page 8), the Department states that, for the purpose of completing the APR, a dual enrollment program is defined as a collaborative effort between high schools and colleges that allows high school students to enroll in college-level courses and earn credit toward a high school diploma and a college degree (college credit dual enrollment) or a career preparation certificate (career dual enrollment). The Department considers this to be an adequate definition that has also been used for the Upward Bound and Upward Bound Math-Science APR.

Action Taken by ED: No change.

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

Comments: Several commenters expressed concern that (Section II, H) and (the last four columns of Section II, M) is a duplication of questions on dual enrollment; they recommended deleting either (Section II, H.) Participants in Dual Enrollment or the last four columns of (Section II, M). Other commenters argued that ascertaining the number of participants receiving college credit and/or an associate degree as a result of participation in a dual enrollment program (Section II.M, columns 9 and 10) would be difficult to achieve, in part because of FERPA regulations; thus these commenters thought the requirement to be excessively burdensome.

Discussion: Section II, H. is requesting aggregate data on dual enrollment. In contrast, section II, M consists of disaggregated data based on Target Schools. Based on the comments received, the Department revisited (Section II, H) and (the last four columns of Section II, M). The Department believes that the information requested in columns 9 and 10 may be excessive. Moreover, it's not the projects that are supplying DE as a service.

Action Taken by ED: The Department has made the following revision to Section II, M of the TS APR booklet as well as to the corresponding guidance in the TS Instruction booklet. Column 9 and column 10 in Section II, M have been deleted. Columns 1 - 8 is information that projects already track. Therefore, columns 1 – 8 will remain as is in Section II, M of the TS APR booklet along with the corresponding guidance in the TS Instruction booklet.

Comments: Two commenters noted that in the Talent Search APR Tool booklet on page 3 Section II. J. #4 and the Talent Search APR instructions booklet on page 8 refers to the use of the Educational Opportunity Centers (EOC) program as an option for TS participants that have been served by another federally funded program in the same year conflicts with the language under Sec. 402B Higher Education Act of 1965 (Talent Search), and more specifically under item C.3 *Require an assurance that individuals participating in the project proposed in the application do not have access to services from another project funded under this section or under section 402F [EOC].* Several commenters recommended that the option for “EOC” be deleted because this not allowable under the program legislation.

Discussion: The Department agrees with the commenters.

Action Taken by ED: The option for reporting on Educational Opportunity Centers (EOC) has been removed from (Section II. J) on the TS APR tool and from the TS APR instructions booklet on page 8.

Comments: One commenter recommended that Section II. K. FAFSA Completion Total (must equal) the sum of (Section III, A.5) seniors in high school + (Section III. A.8) students in 5th year dual enrollment program. The commenter stated this would be consistent with how projects are reporting graduation, rigorous completion and college enrollment.

Discussion: The Department believes the Talent Search instructions booklet specifically provides clarification on who must be reported for Section II, K. FAFSA Completion. That is, TS projects must “Report in this section the number of participants (seniors, individuals in an alternative education program who are at an academic level of a high school senior, and other individuals interested in enrolling in a program of postsecondary education (e.g., individuals in a GED program)) who applied for **Federal** financial aid through the use of FAFSA (Free Application for Federal Student Aid) during the reporting year, but did not enroll in a postsecondary education program during the reporting year. Report the number of these participants who used the FAFSA to apply for financial aid and then enrolled in a program of postsecondary education during the reporting year, by the fall term immediately following the reporting year, or the next academic term (e.g., spring term) if the institution deferred the participant’s enrollment. Also, report the number of participants that did not apply for federal financial aid during the reporting year and/or the number of participants whose applications for Federal financial aid during the reporting year could not be confirmed. The total number for this entry will consist of numbers entered for Section III A5 and Section III A8. Therefore, the Department does agree with this commenter’s recommendation.

Action Taken by ED: The Department has made the following revision to Section II, K4 on page 3 of the TS APR booklet as well as to the corresponding guidance on page 9 in the TS Instruction booklet. Section II, K4 now states, “Total (must equal Section III, A5+A8).

Comments: Several commenters recommended not including “Participants who received neither CPP service,” option #4 in Section II, L (Competitive Preference Priorities), arguing that option 4 implied all participants should receive one or both services.

Discussion: The Department believes the commenters’ point to be a non sequitur. Neither in the 2016 TS grant competition, nor in the APR form and instructions, did the Department require that projects undertaking one or both of the CPPs serve all participants with one or both of the CPP services. Having all four options in II.L increases the likelihood that projects will provide accurate counts of those receiving CPP services.

Action Taken by ED: No change.

Comments: One commenter recommended for Section II, M. changing “Or N/A” to “or 9999”; consider adding “Number of participants for whom receipt of college credit is unknown or could not be confirmed” because not all high school transcripts indicate if a student received college credit.

Discussion: The Department agrees with the comment to add “9999”. In Section II.M, the Department has deleted columns 9 and 10 which referred to “Dual Enrollment” and college credit received.

Action Taken by ED: The Department has revised the language in Section II.M Column 8 from “Or N/A” to “9999 for N/A”. The Department has deleted columns 9 and 10 which referred to “Dual Enrollment” and college credit received. As a result of this change, the Department does

not see the need to add a column for the “Number of participants for whom receipt of college credit is unknown or could not be confirmed.”

Section III: Educational Status of Talent Search Participants (at the time of first service in the reporting year)

Comments: Two commenters recommended in Section III to delete lines A2 – A4 that will require projects to separate data out by grade levels (9 – 11), when reporting on the educational status of participants at the time of first service and to replace this section with or keep the current database model “High School non-senior (9th – 11th) “. Requiring projects to report by separate grade levels will unnecessarily burden projects.

Discussion: Projects are already required to keep records of individual participant by grade level annually along with maintain a record of the services that were provided to the respective participant. TS grantees are already required to collect all of the information being sought in this section, so there is no additional burden on data collection.

Action Taken by ED: No change.

Comments: Two commenters recommended deleting in Section III, option A10 “Other participants (see instructions and provide explanation below if larger than 10 percent of total population). TS can provide services to GED graduates, or adults under age 27, therefore it may not be necessary to provide an additional explanation of a large percentage.

Discussion: The Department produces reports from the data that is collected on the TS APR. These reports are disseminated to the public. Providing the public with aggregated data as well as an overview on the population served by the TS program is the responsibility of the Department. TS grantees are already required to collect all of the information being sought in this section, so there is no additional burden on data collection.

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: Two commenters recommend for Section IV, C. adding a new column “Totals.”

Discussion: A review of Section IV. C. does reflect that there are “Total” boxes for both columns and rows.

Action Taken by ED: No change.

E. Postsecondary Attainment; Subsection 1

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

Discussion: There is no significant difference other than that the random sampling procedure is designed to reduce, not increase, the burden on grantees by making allowances for the tracking of a portion of postsecondary enrollees. Projects may follow the sampling guidelines discussed in the instructions or choose to track all postsecondary enrollees.

Action Taken by ED: No change.

E. Postsecondary Attainment; Subsection 2

Comments: Several commenters recommended that Section IV, E. Subsection 2 Postsecondary Attainment in option A8 include the language “a participant who earned a postsecondary credential prior to becoming deceased” so that project would not be penalized for a deceased student if they earned a degree.

Discussion: The practice uniformly across the Federal TRIO programs is to exclude participants that have become deceased, during the reporting period, from an objective’s calculation. Participants who died are included in the Funded Number criterion for any assessment year in which they were served. For all other criteria, as applicable, current and prior-year participants who died are not included in the calculations. Therefore, we will exclude the deceased from the PSE attainment calculation.

Action Taken by ED: No change.