

**Summary of Comments Received During the 60-day Public Comment Period**  
**Proposed 2016 Annual Performance Report**  
**Educational Opportunity Centers Program**  
**September 14, 2016**

On July 1, 2016, the U.S. Department of Education (Department) published a notice inviting comments by August 29, 2016, on the proposed annual performance report (APR) for the Educational Opportunity Centers (EOC) Program. The Department received one comment. An analysis of the comment follows.

**Section IV: Educational Status of EOC Participants**  
**(at end of budget period or for the following fall term)**

**A. Objective: Secondary School Diploma**

**Comment:**

One commenter stated that Objective A - Secondary School Diploma, which measures the success of EOC programs in helping participants who do not have a secondary school diploma at the time of first service obtain one during the project year, skews the data and "inhibits" grantees ability to achieve the objective because the denominator used to calculate the objective includes students who are in the 9<sup>th</sup>, 10<sup>th</sup>, and 11<sup>th</sup> grades. As such, the commenter noted that very few of these students are able to complete all of the necessary credits to earn their high school diploma by virtue of their grade status. The commenter suggested that in order to enhance the quality of information collected, and better understand the impact EOC has on helping participants earn their secondary school diploma, the Department should remove high school non-seniors (9<sup>th</sup> – 11<sup>th</sup> graders) from the Objective A calculation.

**Discussion:**

In assessing who should be counted in Objective A, both the statute and the program regulations, do not specifically exclude students whose grade level is 9<sup>th</sup>, 10<sup>th</sup>, or 11<sup>th</sup> grade from the calculation. In fact, the statute and regulation mandates that the Department include, in the denominator, students who meet the following criteria: (1) served by the project and (2) do not have a secondary school diploma at the time of first service. Furthermore, the Program Profile Sheet contained in the application the grantee submitted at the time they applied for a grant, required the applicant to provide their objectives. Objective A in the Program Profile Sheet does not exclude students in 9<sup>th</sup>, 10<sup>th</sup>, or 11<sup>th</sup> grade who have not received a diploma. When applicants are setting their objectives they should consider the population they will be serving (e.g., non-seniors, seniors, etc.) and set their objectives accordingly.

**Action Taken by ED:**

None

