Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP)
Summary of Public Comments on
Proposed Changes to the 2019 Annual Performance Report (APR)
Following 60 Day Review Period

On April 1, 2019, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by May 31, 2019, on the proposed annual performance report (APR) for the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) program. Twelve respondents submitted approximately 57 individual comments (i.e., multiple comments from respondents). Most of the commenters expressed some concerns about the revised formatting changes that request less information than the previous instrument. Some commenters questioned the number of burden hours estimated to complete the GEAR UP APR. 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 GEAR UP 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.

Section II: ADMINISTRATIVE INFORMATION

Comments: A respondent recommended adding on the APR form the word count limit of the on-line submission for each of the open-ended questions.

Discussion: The Department agrees with this recommendation.

Action Taken by ED: The Department will add the word count limit for each open-ended question on the APR form.

Comments: A respondent recommended re-inserting from the prior APR the following open-ended question ("Describe your project's success and challenges in advancing your approved project evaluation plan for program improvement during the activity reporting period.") on the APR form in Section II. The respondent expresses concern that there would be no feedback mechanism to help ED staff contextualize the data and outcomes they are monitoring.

Discussion: The Department disagrees with this recommendation. The APR Form in Section I: EXCUTIVE SUMMARY states, Describe the extent to which you have implemented all program activities and components planned for this reporting period, highlighting your major outcomes, successes, and challenges as they pertain to: Improving the academic…, Increasing educational expectations…. Respondents have the option to provide feedback to ED regarding data and outcome measures in Section 1: EXECUTIVE SUMMARY.

Action Taken by ED: No change.

Partnership Identification

Comments: One commenter expressed concern that given the legislative requirement that GEAR UP fiscal agents partner with a variety of entities, not providing a full accounting of partners nationally will obscure Congressional and public understanding of the number and categorization of GEAR UP partners. Given that a respondent would need to document their partners for audit purposes the burden relief is limited to data entry at the time of submission. We believe that the public interest of compiling a national roster of GEAR UP partners on an annual basis far outweighs the limited reduction in burden.

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

Action Taken by ED: The table has been reverted to the prior APR table.

Comments: One commenter expressed a concern regarding the instructions for question #6 on the APR that state, "Do not request changes of grant partners here. As required by the Uniform Guidance (200.308(c)(i) and (c)(vii)), that type of request is a change that requires prior approval by the Department and must be addressed separately from this report." The commenter disagrees with this interpretation of the cited regulations and recommends the instructions be eliminated, or at minimum, revised to stipulate that prior approval is required in some, but not all, cases.

Discussion: The GEAR UP program has a matching component, which requires projects to match with either cash or in-kind. The majority of GEAR UP grantees meet their matching requirement through in-kind donations from its Partners (e.g., Local Education Associations (LEAs), Institutions of Higher Education (IHEs), Community Organizations and Businesses). Any change in Partnership may potentially impact the project's ability to meet the match requirement and is subject to prior approval if changing partners that contribute to match consistent with 2 CFR 200.407(b). Therefore, the Department disagrees with this recommendation to allow projects to change partners without prior approval for community and business organizations.

Action Taken by ED: No change.

Section III: FISCAL MANAGEMENT

Current Budget Period

Comments: One commenter stated, "The proposed method for documenting a respondent's current budget period is a significant departure from standard practice in GEAR UP applications and prior APRs. Given that a respondent would need to document their budget according to the line-item categories for audit purposes, the burden relief is only limited to data entry at the time of submission."

Discussion: The Department agrees with the commenter's statement.

Action Taken by ED: The Department will be reverting to the previous Current Budget Period table for consistency.

Budgetary Modifications

Comments: One commenter suggested that since an open-text response is required, a word limit should be expressed to align to the on-line reporting portal.

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

Action Taken by ED: The Department will express a word limit on the GEAR UP APR paper version to align to the GEAR UP on-line reporting portal.

Matching Contributions

Comments: Several commenters expressed concern that the proposed APR asks for any "significant" matching contribution to be listed but doesn't give clear guidance as to what defines "significant." Commenters note that the requirement to count millions of dollars of match for each grant each year could result in hundreds of potentially significant listings, taking considerable amounts of time and effort from project staff. It was recommended that the Department revert to the previous version of this question.

Discussion: The Department agrees with the commenters' recommendation.

Action Taken by ED: The Department will revert to the previous Matching Contributions table for consistency and clarity.

Scholarship Component

Comments: One commenter recommends eliminating question 6(d): States Granted Exceptions to the Scholarship Component. For states that have received the waiver to offer GEAR UP scholarships, this question will present a significant data reporting burden for a very unclear purpose.

Discussion: Question 6(d) is a two-part question. The first question asks: "Did your State reserve non-Federal funding for scholarships and if so, for how many students?" The second question asks: "Did your State disburse non-Federal scholarship funding to students during the reporting year and if so, to how many students?" We note that GEAR UP State projects that receive a waiver from the Scholarship Component receive such a wavier on the basis of their demonstration that they have "another means of providing the students with the financial assistance described in [Section 404E]." The Department does not agree that it is in the public interest to avoid monitoring how States that are granted the exception are providing the required financial assistance to participants through other means. However, we agree with the commenter that "reserving" funds is not the only means by which States can administer their non-Federal scholarship programs to support GEAR UP participants.

Action Taken by ED: The Department has eliminated the first part of this question that addresses "Did your State reserve non-Federal funding for scholarships and if so, for how many students?"

Section IV: STUDENTS' DEMOGRAPHIC DATA

Number of Participating Students

Comments: One commenter recommends reverting to the prior version of the table for questions that addresses "Number of Participating Students," for a number of reasons. The respondent would need to document its student participation along multiple categories and grades for audit purposes, the change would substantially obscure basic facts about the participation of students in the GEAR UP program and ED would be unable to report the number of GEAR UP students by grade level, which the respondent deems important.

Discussion: The Department concurs with the commenter's recommendation.

Action Taken by ED: The Department will revert to the prior version of the table for the "Number of Participating Students."

Participation by Gender

Comments: Several commenters recommend revising the instructions to account for the fact that three states and an increasing number of communities have formally added a "non-binary" designation to reflect any gender identity. Guidance should be shared with respondents in these states and communities.

Discussion: The table on gender is in alignment with the Census questionnaire. The Department does not agree the table needs to be revised.

Action Taken by ED: No change.

Participants with Limited English Proficiency

Comments: One commenter recommends reverting to the prior APR approach in making this question "optional" for respondents. Many GEAR UP projects rely on school districts to provide Limited English Proficiency (LEP) status, which, for some, can be a barrier to reporting complete and accurate data.

Discussion: We appreciate the commenter's suggestion; however, we are concerned that making this question optional has the potential to yield low-quality data.

Action Taken by ED: The Department declines to make this question optional but will include language offering grantees the opportunity to explain any barriers to collecting these data and corresponding data quality issues.

Participants with IEP Status

Comments: One commenter recommends reverting to the prior APR approach in making this question "optional" for respondents. The commenter indicated that many GEAR UP projects rely on school districts to provide Individualized Education Program (IEP) status, which many will not share, citing FERPA or local data privacy concerns. As a result, this can be a barrier to many reporting complete and accurate data.

Discussion: We appreciate the commenter's suggestion; however, we are concerned that making this question optional has the potential to yield low-quality data.

Action Taken by ED: The Department declines to make this question optional but will include language offering grantees the opportunity to explain any barriers to collecting these data and corresponding data quality issues.

Homeless and Foster Care Students

Comments: Several commenters recommended reverting to the prior APR approach in making this question "optional" for respondents. Many GEAR UP Programs rely on school districts or child welfare agencies to provide Homeless/Foster Care status, which, for some, can be barrier to reporting complete and accurate data.

Discussion: We appreciate the commenter's suggestion; however, we are concerned that making this question optional has the potential to yield low-quality data.

Action Taken by ED: The Department declines to make this question optional but will include language offering grantees the opportunity to explain any barriers to collecting these data and corresponding data quality issues.

Section V: OBJECTIVES AND SERVICES

Participants Served by Another Federal Program

Comments: Several commenters recommended revising the table to eliminate the last two rows with regards to "other federally funded programs."

Discussion: The Department appreciates the commenters recommendation on revising the table "Participants Served by Another Federal Program." The Department disagrees with the recommendation to eliminate the two rows for reporting on participants that receive services from "other federally funded programs." The Department stated in a Corrective Action Plan to the Government Accountability Office (GAO) that the GEAR UP Program would collect this information as a measure for minimizing the possibility of duplication of services with participants that receive services from the GEAR UP Program and other federal funded program(s).

Action Taken by ED: No change.

Required Statutory Activities/Services

<u>Comments:</u> Several commenters state that the directive to "list implemented activities/services" can potentially become extremely burdensome given the latitude that schools have to implement the same activity categories in different ways. The commenters recommended revising the column that reads, "List Implemented Activities/ Services," to read "Summarize the Primary Activities/ Services Provided During the Reporting Period."

<u>Discussion:</u> The Department agrees with the commenters' recommendation.

<u>Action Taken by ED:</u> ED has revised the column heading to read, "Summarize the Primary Activities/Services Provided During the Reporting Period."

<u>Comment:</u> One commenter recommended ensuring that the activities/services listed in the table are framed as services, not outcomes and splitting out college applications and enrollment, as these are two separate activities. Lastly, the commenter recommended removing "Scholarships" from the table because it is address elsewhere in the APR

<u>Discussion:</u> The Department accepts the recommendation for replacing the term "Outcomes with Services" and removing "Scholarships" from the table. The category "College Applications and Enrollment," is derived from the GEAR UP Program regulations.

<u>Action Taken by ED:</u> The heading has been revised to reflect the term "Services." The category for "Scholarships" has been removed from this section. The Department declines the recommendation for splitting the category "College Applications and Enrollment," as this category is derived from the GEAR UP Program regulations.

Secondary Education Activities/Services

<u>Comment:</u> One commenter recommended revising the table. The commenter mentioned concerns that the categories have become overly narrow, redundant, and there are many common GEAR UP activities that would be tough to categorize in the proposed table.

<u>Discussion:</u> The Department does not agree with the commenter's assessment as the GEAR UP regulations stipulate what services are required.

<u>Action Taken by ED:</u> No change.

Propose adding new category to table "Supplemental Academic Initiatives"

<u>Comment:</u> One commenter proposed adding a new category to the Secondary Education Activities/Services table that would allow grantees to report key aspects of the GEAR UP program. This will allow project to: Define Services - designed to enhance achievement of students.

Discussion: The Department appreciates the commenter's proposed recommendation. The APR has two potential sections for reporting key aspects of the GEAR UP project. The Secondary Education Activities table has a category listed as "other" that allows for reporting of "Supplemental Achievement Initiatives." In addition, the APR includes a section for Professional Development Activities Provided to Educators that allows for the reporting of "Supplemental Achievement Initiatives." The Department does not agree with this recommendation.

Action Taken by ED: No change.

Postsecondary Education Activities

Comments: Several commenters expressed challenges with tracking activities/services listed in the table for postsecondary education. Given that this will be the first time that postsecondary service data is being reported for the APR purposes, the commenter recommends that the table be entirely free of pre-determined categories for this three-year clearance period or relabeled the following: Transition Activities, Academic Advising & Support, Social Integration, Financial Support, Family Engagement, and Other.

Discussion: We appreciate the comment but conclude that since this is the first time the Department is collecting information on the services for the seventh year, the information provided in the table will be useful.

Action Taken by ED: No change.

FAFSA Completion

Comment: One commenter recommended revising the table heading for "FAFSA Completion" to the following: (a) Total Unduplicated Number of 12th Grade GEAR UP Students Served During the Reporting Period; (b) Total Unduplicated Number of 12th Grade GEAR UP Students Who Completed the FAFSA by June 30th; and (c) Total Unduplicated Number of GEAR UP Students, FAFSA Data Not Available.

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

Action Taken by ED: The Department accepts the recommendation. The Department will revise the question as suggested by the commenter.

Target Schools Served

Comment: One commenter recommended changes to the proposed table for the Target Schools Served. The commenter recommends table and instructions to note if the school was active during the reporting period (a yes/no response). The commenter also proposes adding the following categories: provide specific grade levels GEAR UP served during the reporting period and collect city, state, and zip code information for the each of the target schools served.

Discussion: The Department agrees with the commenter's recommendation for adding the specific grade levels, and the city, state and zip code information for each target school. The Department does not see the value or purpose for inquiring as to whether a school was active as all listed target schools are considered active Partners.

Action Taken by ED: The Department has revised the table to include the following headings: Specific Grade levels, City, State and Zip Code. The Department disagrees with adding a column for reporting (yes/no response) whether each school was active.

Section VI: GEAR UP STUDENT OUTCOMES

Secondary Course Enrollment and Completion

Comments: Several commenters recommended revising the instructions to the proposed question on the APR. The commenters expressed concern about defining a "Rigorous Course" exclusively as being an Advanced Placement or International Baccalaureate course. We recommend revising the pertinent column to read, "At least one rigorous class (e.g., Advanced Placement, International Baccalaureate, or Dual/Concurrent Enrollment Course)." In addition, we recommend that the "Pre-algebra" column be revised to read "Pre-algebra or equivalent" similar to the Algebra I column.

Discussion: The Department recognizes that Secondary Course Completion requirements are established by local or state entities. Local and/or State school districts may define what is classified as a "Rigorous Class." The terms "Advanced Placement Classes (AP)" and "International Baccalaureate Classes (IB)" are stated as examples of "Rigorous Classes." AP and IB classes are not all inclusive. Projects may consider classes identified as "Rigorous" by its local or state school districts when addressing this section. The Department disagrees with the commenter's recommendation that being enrolled in a "Dual/Concurrent Enrollment Course" in itself is classified as a "Rigorous Class." Dual/Concurrent Enrollment does not constitute that a participant is enrolled in a "Rigorous Class." The Department agrees for consistency that the column labeled "Pre-algebra" should be revised to "Pre-algebra or equivalent" as reflected already for the column labeled "Algebra I or equivalent."

Action Taken by ED: The Department added language that clearly emphasized additional examples defining a "Rigorous Class." We also modified the column label to read, "At least one rigorous class (e.g., Advanced Placement, International Baccalaureate, Honors Class…etc.)" The Department does not agree with adding "Dual/Concurrent Enrollment Course" to the column heading for Rigorous. The Department revised the heading for "Pre-algebra" to read "Pre-algebra or equivalent."

Postsecondary Course Enrollment and Completion

Comments: Several commenters recommended eliminating the question on Postsecondary Course Enrollment and Completion and believes that the GPRA indicator should be revised noting that this requires a tremendous amount of time and effort and the quality of the data is

very likely to be weak. The commenters further noted that many states and IHEs are no longer offering non-credit bearing remediation courses as a matter of formal policy.

Discussion: We appreciate the issues raised by the commenters, particularly the challenges associated with following GEAR UP participants enrolled at several different postsecondary institutions.

Action Taken by ED: We have revised the question to require grantees to only report this data for students who enroll in postsecondary institutions that are partners to the GEAR UP grant.

Educational Progress by GEAR UP Students

Comments: Two commenters recommended eliminating the columns related to "Number of Students Proficient or Above on State Assessment for English/Language Arts" and Mathematics." Changes to the state-mandated assessment practices following the adoption of Every Student Succeeds Act (ESSA) has rendered these columns inoperable. The commenters also recommend revising the "Number of Students taking the PSAT/PLAN by the end of 10th Grade" column text to read "Number of Students Taking the PSAT/Pre-ACT, or Equivalent College Readiness Assessment by the end of 10th Grade." The reasoning is the PLAN is no longer offered by ACT, Inc. and has been replaced by several options, including the Pre-ACT, Aspire 9, and Aspire 10.

Discussion: The commenters are in error—ESSA still requires reporting measures of statewide levels of achievement and proficiency in ELA and Mathematics.

Action Taken by ED: No change.

Comments: Two commenters recommended revising the "Number of Students taking ACT or SAT Exam by the end of 11th Grade," column text to read "Number of Students Taking ACT or SAT Exam by the end of 12th Grade." Many students are taking the ACT/SAT early in their 12th grade year. The commenters suggest that due to the proliferation of these state- or district-wide contracts (paid with non-GEAR UP funds), it is unreasonable to exclude these large numbers of students from what is a successful outcome.

Discussion: The Department does not agree with the commenters' suggestion. College applications are due during a student's 12th grade year; therefore, it is important for GEAR UP participants to take the SAT/ACT well before the end of 12th grade.

Action Taken by ED: No change.

End