

Responses – FY 2019 Strengthening Institutions Program Application Booklet Public Comment Period

The U.S. Department of Education (ED) received sixty-nine comment documents regarding the Strengthening Institutions Program (SIP) application booklet, with an additional comment regarding the Center for Medicare & Medicaid Services. Most of the comments focused on the application's recommended format, with one comment specifically on burden hours, another on the use of the word "measures," and a third on the Invitational Priority. SIP staff has combined similar or overlapping comments, to facilitate the response and review of these comments.

Application Format:

Comments: All commenters were concerned with the requirement that all text in the application narrative should be double-spaced, including titles, headings, footnotes, quotations, references, captions, as well as text in charts, tables, figures, and graphs, some noting this is a change from past requirements.

Response: The language to double space the complete application narrative is the sample language included in Chapter J, the Department's guidelines to creating Notices. This year, SIP decided to utilize that sample language.

Change: The requirement for all text to be double-spaced will be changed to previous years' language, which requires all narrative be double spaced, but excludes the following: titles, headings, footnotes, quotations, references, captions, as well as text in charts, tables, figures, and graphs in the application narrative, which may be single spaced.

Comments: There was a comment requesting the Department use a "works cited" document at the end of the application narrative, rather than footnotes. This would increase the readability of applications.

Response: While footnotes are allowed in the application narrative, they are not mandatory. Applicants also have the choice of including a bibliography, which is not included in the page limit. The choice of which to use is up to the applicant, who is not penalized for whichever choice is made.

Change: No change.

Comments: There were several comments regarding the Secretary's April 27, 2017 memo stating that: "Program offices *may suggest* page limits and formatting standards (such as font size, line spacing, and the like) but **may not** use ignoring these suggestions as a basis to reject grant applications.", and the current recommended formatting, which includes double-spacing titles, headings, footnotes, quotations, references, captions, as well as text in charts, tables, figures, and graphs. Commenters asked if the Secretary's memo applied to the competition, apprehensive about reviewers penalizing those who follow the formatting recommendations. Commenters stated that following the proposed formatting recommendations will result in an additional number of pages beyond the page limit, and in making the readability of these applications difficult. Both reasons could result in application disqualification or

point deduction by the readers, and there are no assurances this will not happen. Concerned with the recommended page limit and the Secretary's memo, a few of the commenters suggested the application page limit be required, rather than recommended, concerned that those that follow the recommendations are disadvantaged by those that do not and are able to include more material. Others called for the page limit recommendation to be increased, to allow for the double-spacing and 12-point font requirements.

Response: The Department will follow the Secretary's guidelines, which have updated internal regulatory manuals. The Department is confident that it is the quality, not the quantity of the content that determines an application's merit. Additional pages will not necessarily be advantageous for an application that does not have substantive content. With regards to reviewer penalization concerns, reviewers do not have the authority to disqualify applications; only program staff can make those determinations. The Secretary's guidelines do apply; therefore, formatting will not be a factor in application disqualification. Additionally, points in an application are earned based on the substance of the responses to the selection criteria; formatting has not historically been a cause for point deduction. Furthermore, prior to every competition, all reviewers are required to participate in training led by program staff. A key element in this training is instructions to reviewers, which strongly emphasize the requirement that an application's score be solely based on its response to the selection criteria and not on extraneous issues such as formatting. Reviewers are further instructed to support their scores with comments that detail the reasons for awarding or deducting points. Comments are reviewed by program staff prior to submission and all program staff are aware that formatting does not play a role in an application's score.

Change: No change.

Comments: Some commenters requested that the Department establish requirements for what can be considered a table, which must have a minimum of two columns and two rows.

Response: The Secretary of Education's 2017 guidance deeming formatting a suggestion, not a reason to invalidate applications, negates the need to require a table have at least two columns and two rows. As formatting is no longer a reason to reject applications, there is no need to further modify the current instructions.

Change: No change.

Burden Hours:

Comments: A commenter was concerned with the listed burden hours (65), which the commenter deemed insufficient to complete an application.

Response: The commenter applied in fiscal year (FY) 2015, when, under an additional three-point competitive preference priority (CPP), applicants were to provide a minimum of one and a maximum of two studies that met the What Works Clearinghouse (WWC) definition of moderate evidence of effectiveness, which is not a requirement this year. While the current process still requires at least one study to undergird the applicant's chosen project and implementation strategy, the studies need not meet the WWC's

definition of moderate evidence of effectiveness, a more arduous requirement. Furthermore, the number of postsecondary studies available at the WWC in FY 2015 were much more limited than they are now, four years after several other postsecondary education-focused programs included moderate evidence of effectiveness in their competitions. The time needed to identify a study or studies to support an application's methodology now is much less than it was in FY 2015.

Change: No change.

Measures:

Comments: There was a concern that on page 47 of the application instructions applicants were referred to the SIP Government Performance and Results Act (GPRA) measures (enrollment, persistence, graduation and fiscal stability) when crafting the institution's overall goals in the Comprehensive Development Plan (CDP) criterion. However, on the page applicants were referred to, page 42, there is no mention of the word measures. Rather, the language states performance indicators. The commenter requested this be clarified and pointed out the measures/performance indicators begin at the bottom of page 41.

Response: The commenter is correct. Earlier in the booklet, there is discussion of SIP's GPRA performance indicators. During the CDP discussion, applicants are referred to them, but in the referral, the term used is GPRA measures. This may create confusion when applicants look for GPRA measures and find only GPRA performance indicators.

Change: The language regarding the CDP development, page 48, will be changed to read GPRA performance indicators, to clarify. In this same section, applicants will be referred to pages 42-43 to locate the performance indicators, not just page 42.

Invitational Priority -- Spurring Investment in Opportunity Zones:

Comments: A commenter had concerns regarding the Invitational Priority. The first focused on how the priority would be judged—if applicants only had to provide the Census tract number of the Opportunity Zone (OZ) or if there needed to be a narrative. The second concern centered on whether or not the Department would cross-reference zip codes to Census tract numbers, as students served in OZs were tracked by zip code not by tract number.

Response: On page seven of the application booklet published, we included a table that indicates the recommended number of pages an applicant has per section. For the Invitational Priority, applicants have two-pages to provide information that demonstrates how the applicant has been/is/will be serving children or students who reside or study at a school or institution in an OZ. However, this information is not included in the Notice Inviting Applications, which probably caused the confusion.

With regards to the cross-referencing of zip codes, in the language of the priority, the Department provides a link to the Opportunity Zones Resources page. In that page there are other resources, including a map, where the applicant is able to type in an

address and find out if the area is an OZ and the corresponding tract number. Applicants must use those resources to provide that information necessary to determine if the priority was or was not addressed.

Change: No change to the request for the Department to cross reference zip codes with Census tracts. However, to clarify that all priorities need to include a narrative that is part of the recommended page limits, language was inserted into the Notice Inviting Applications that specifies how many recommended pages applicants have to address each priority.