

Upward Bound and Upward Bound Math-Science Programs - Annual Performance Report Summary of Public Comments Made During 30-day Comment Period, with Responses from ED

Introduction

The U.S. Department of Education received two submissions concerning the annual performance report (APR) for two of the Federal TRIO programs--Upward Bound (UB) and Upward Bound Math-Science (UBMS). One submission asked whether participants served by UB and UBMS could be counted as enrolled in a program of postsecondary education if those students had been admitted to U.S. military academies. The other submission raised four issues about the APR's General Instructions: one issue regarding postsecondary data on participants ineligible to belong in a UB or UBMS postsecondary enrollment cohort; another on how deceased prior participants would be considered in calculations that might result in earning prior experience (PE) points; and two that noted minor errors.

U.S. Military Academies as IHEs in the UB and UBMS Programs

Comment: The commenter was under the impression that participants who had enrolled in U.S. military academies could not be recorded as such in the UB and UBMS programs' APR.

Response: UB and UBMS participants may indeed be counted as enrolled in, and/or graduated from, U.S. military academies. The commenter may have thought otherwise because not all of the academies are included in the Federal Student Aid Office's Federal School Code Search, a link to which is provided in the APR's field #55, School Code for Postsecondary Institution First Attended. In the APR, for participants first enrolled in one of the U.S. military academies, grantees should use code 555555 (Enrolled in a postsecondary institution not found in the Federal School Code Search) if the institution is not included in the Search.

Change: The Department will state in the General Instructions that U.S. military academies not included in the Federal School Code Search may be coded in field #55 as 555555.

Postsecondary Data on Participants Ineligible for a Postsecondary Enrollment Cohort

Comment: The General Instructions advise grantees to report postsecondary data on all participants, even if the participant did not qualify for a postsecondary enrollment cohort (field #54). A commenter pointed out that, in many cases, such reporting triggers a data validation from the APR system indicating that participants not qualifying for a postsecondary enrollment cohort must be coded with 9s, thus precluding any other information (such as a specific date of postsecondary enrollment or completion).

Response: The Department thanks the commenter for bringing this problem to our attention.

Change: Given the need to make the final 2018-19 APR available to grantees as soon as possible, we will remove from the General Instructions the directions to provide postsecondary data on students who did not qualify for a postsecondary enrollment cohort. For APRs in future years, we will consider the possibility of making changes in the report that would allow grantees to provide postsecondary data on these students.

Effect on Project's Prior Experience Points When A Prior Participant Has Died

Comment: Regarding field #26 (Deceased or Incapacitated Participant), one commenter asked how the death of a prior participant (coded option 1 in this field) would affect prior experience calculations.

Response: Since the 2013-14 reporting year, the TRIO program has published yearly on its website an appendix entitled "Policies and Procedures for Prior Experience (PE) Assessments" for UB-UBMS (<https://www2.ed.gov/programs/trioupbound/report.html>); other TRIO programs have similar appendices. In discussing the calculations used for PE scores, the Department has stated in the appendix how a participant's untimely death would be taken into account. As noted on page 4 of the General Instructions, beginning with the 2018-19 APR, the Department has adjusted the postsecondary education completion objective to **include** in the calculation any deceased or permanently incapacitated prior participants who would belong in the numerator (that is, participants who attained either an associate or bachelor's degree within six years following graduation from high school). Further discussion of this point is found on page 4 of the General Instructions.

Changes: None.

Minor Error in the General Instructions

Comment: A commenter asked (1) whether the cohort year cited in a sentence on page 26 of the General Instructions was correct, and (2) why the Department was instructing grantees on page 27 not to provide the code of the institution if a student began attendance in fall 2019.

Response: The Department thanks the commenter for finding the error on page 26, which will now read, "Once the Department accepts the 2018-19 APR, participants cannot be added to the 2019 postsecondary education enrollment cohort." On page 27, the commenter misread the sentence, which correctly states, "If the student began attendance in fall 2019 (that is, after the end of the 2018-19 reporting period), please **do provide** the code of the institution."

Changes: The Department will correct the sentence on page 26.