

Response to Comments on FR Doc # 2024-09675 Docket: ED-2024-SCC-0067

Comment ED-2024-SCC-0067-0004

The comment was related to K12 school segregation.

Response: This comment is not relevant to the Postsecondary Success Recognition Program. No changes were made in response to this comment.

Comment ED-2024-SCC-0067-0005

The comment states that the Department is proposing a monetary award, that the Department received many unfavorable public comments on the proposed recognition program, and that the Department removed access to an affordable education as a consideration for the recognition program.

Response: The commenter erroneously cites the Postsecondary Student Success Grant (PSSG) program, which is a discretionary grant program that awards funds to improve student outcomes at institutions eligible for Title III and V programs (e.g., minority-serving institutions, institutions predominately serving low-income students). The proposed recognition program does not provide any funding to institutions. The recognition program does include access to an affordable education as a key component for consideration, while the cited PSSG program is focused on retention, transfer, and completion at institutions that serve diverse student populations. Most of the comments the Department received about the recognition program were neutral to favorable. No changes were made in response to this comment.

The comment states that the application form and the supporting statement are outdated because they do not reference ED-2024-OPE-0069.

Response: ED-2024-OPE-0069 is related to the Postsecondary Student Success Grant Program not the proposed recognition program so the comment is erroneous. No changes were made in response to this comment.

The comment states that institutions should be in compliance with all applicable laws not just civil rights laws.

Response: The application will be edited to include this statement in the eligibility requirements section.

The comment asks why the program aims to recognition institutions that increase completion at the expense of accessibility and affordability.

Response: The recognition program focuses on access, affordability, completion, and post-college outcomes. This comment is erroneous and refers to the commenter's perceived change in the recognition program requirements related to citing the PSSG criteria.

Comment ED-2024-SCC-0067-0006

The commenter suggests the terms used in the application related to student success are subjectively defined and suggests using definitions from accreditors.

Response: In order to be eligible to submit this application, institutions must be found eligible based on the Department's forthcoming analysis of publicly-available data on defined metrics including access, affordability, transfer (as applicable), completion, and post-college outcomes (e.g., employment/earnings, debt/repayment) as described in the letter to the applicant section in the application. These measures will be defined based on common usage in the field. The application asks institutions to describe how they define success in the context of their mission and student population in order to better understand their performance on these measures. The application further requires applicants to provide data related to progress on their student success goals over at least the last five years and the impact of their student success interventions. It is not feasible to use measures from accreditors for purposes of this recognition program because there are not consistent measures and/or definition in use across accreditors nor do accreditors consistently provide these data for public use. No changes were made in response to this comment.

The commenter also suggests that the application does not include feedback from students and that there should be an estimate of burden on students related to the colleges' efforts in connection with this award.

Response: The application encourages but does not require institutions to include a letter of recommendation from students and encourages applicants to include students' perspectives in their responses, including through the use of surveys. There is no expected burden on students related to applying for this award beyond the optional recommendation letter. No changes were made in response to this comment.

The commenter further suggests that metrics related to credentials of value that lead to economic mobility are flawed because the economic market operates independently from the institutions and that institutions taking credit for moderate employment rates does not constitute success.

Response: The use of post-college employment and earnings as one but not the only metric to understand institutional performance has become common practice in the field over the last decade. Given observed differences in students' post-college outcomes among similar institutions and differences in students' post-college outcomes by demographics among at the same institution, these measures can provide insight into whether all students are earning credentials that offer value in the workforce. No changes were made in response to this comment.