

## 30-DAY PUBLIC COMMENT RESPONSES

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### College Assistance Migrant Program Annual Performance Report

June 2024

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## Response to Public Comments

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The Department of Education (Department) solicited comments on a proposed revision to the College Assistance Migrant Program (CAMP) Annual Performance Report (APR), an existing information collection, in a notice published in the **Federal Register** on May 10, 2024 (89 FR 40476). The 30-day comment period for the CAMP APR closed on June 10, 2024. The Department received a total of 5 public comments, which responded to the proposed collection of the required final project evaluation and the elimination of a data element collecting standardized test scores. The section below provides a summary of the public comments received and the Department's responses to those comments.

### BACKGROUND:

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The purpose of the College Assistance Migrant Program (CAMP) is to assist migratory or seasonal farmworkers (or immediate family members of such workers) who are enrolled or are admitted for enrollment on a full-time basis at an institute of higher education to successfully complete their first academic year of their postsecondary program. The Office of Migrant Education (OME) collects information for the CAMP, which is authorized under Title IV, Section 418A of the Higher Education Act of 1965, as amended by Section 408 of the Higher Education Opportunity Act (HEOA)(20 U.S.C. 1070d-2) (special programs for students whose families are engaged in migrant and seasonal farmwork), and 2 CFR 200.328, which requires that recipients of discretionary grants submit an Annual Performance Report to best inform improvements in program outcomes and productivity.

# **COLLEGE ASSISTANCE MIGRANT PROGRAM ANNUAL PERFORMANCE REPORT PUBLIC COMMENTS AND RESPONSES**

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## **1. Collection of required project evaluation in the Final Performance Report.**

### **Public Comments**

Five (5) total public comments expressed general concerns with the proposed change, citing reasons such as:

- Inability/lack of capacity in CAMP programs to conduct project evaluations;
- Financial and/or labor resources required to conduct the evaluations; or
- Evaluations could detract from the service goals of the program.

### **Response**

The Department appreciates the feedback from commenters regarding the ability of CAMP programs to adhere to the project evaluation requirement. However, the proposed change is not to add a new requirement for a project evaluation. Project evaluations are already required as part of the CAMP Selection Criteria used to evaluate funding applications (see CAMP Notice Inviting Applications, [88 FR 77996](#) Selection Criteria F, quality of the project evaluation [Up to 20 points]). As such, projects are already expected to conduct the project evaluation as described in their approved applications. Further, in their approved budget narratives, projects were to include costs for all components of their projects, including evaluation. Thus, approved budgets and staffing plans should incorporate the resources necessary to fulfill the evaluation requirement.

The proposed change is for OME to collect the required project evaluations as part of grantees' Final Performance Reports. OME currently only collects the project evaluations from grantees as part of monitoring activities.

Because project budgets and staffing plans should incorporate resources necessary to conduct the evaluation, evaluations should not detract resources from the service component of the program.

## **2. Quality of required project evaluations.**

### **Public Comments**

One (1) comment expressed concern that some projects may not have enough participants for an evaluation if students deny consent to the use of their data.

### **Response**

Project evaluation designs are reviewed for quality as part of the CAMP Selection Criteria used to evaluate funding applications (see CAMP Notice Inviting Applications, [88 FR 77996](#) Selection Criteria F, quality of the project evaluation [Up to 20 points]). The CAMP Selection Criteria evaluates “the extent to which the methods of evaluation will, if well implemented, produce promising evidence,” the definition of which “includes at least one statistically significant and positive (i.e., favorable) effect on a relevant outcome” (see also 34 CFR § 77.1). Grantees are expected to complete a final project evaluation using the evaluation design in their approved application.

In addition, OME understands that projects do not have control over the number of students consenting to the use of their data in an evaluation. The collection of final project evaluations is intended to contribute to continuous improvement of the CAMP program overall, and as such, OME plans to use the evaluations for purposes such as:

- Better understanding potential factors contributing to national program trends;
- Gaining a better understanding of the elements that support project success to inform technical assistance and peer learning; and
- Identifying grantees’ strengths and areas of growth in data and evaluation to provide the most relevant technical assistance for conducting high-quality evaluations.

### **3. Removal of data collection on standardized test scores (SAT and ACT).**

#### **Public Comments**

One (1) public comment expressed support for removing this data collection because fewer institutions are using SAT or ACT scores to admit or place students, and many students do not take these exams.

#### **Response**

The Department appreciates the feedback from commenters regarding the removal of this data element.