

60-DAY PUBLIC COMMENT RESPONSES

**College Assistance Migrant Program
Annual Performance Report**

May 2024

Attachment A

**College Assistance Migrant
Program (CAMP) Annual
Performance Report:
Response to 60-day Public
Comments**

OMB No. 1810-0727

INTRODUCTION

This attachment contains the U.S. Department of Education's (Department) responses to public comments received on the College Assistance Migrant Program (CAMP) Annual Performance Report (APR). The 60-day comment period for the CAMP APR closed on April 8, 2024. The Department received a total of 12 public comments, responding to one or both of the topics outlined below.

The section below provides a summary of the public comments received, the Department's response(s) to those comments, and any resulting changes, if any, being made to the proposed data collection package.

The Department appreciates the time and attention the public spent on reviewing the CAMP APR information collection package. The Department reviewed, summarized, and documented each comment prior to analyzing all comments as a whole. This documentation will aid in the finalization of this data clearance package and will serve to inform future policy decisions regarding the Department's data.

COLLEGE ASSISTANCE MIGRANT PROGRAM ANNUAL PERFORMANCE REPORT PUBLIC COMMENTS

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

Public Comments

Twelve (12) 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.

ED 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 the Department's Office of Migrant Education (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.

Additionally, the proposed new forms will apply for the 2023-2024 reporting period; however, OME plans to consider any new data elements as optional for the first year (2023-2024 reporting period). OME plans to require these new data elements beginning the following year, the 2024-2025 reporting period. Thus, OME would not begin to require submission of project evaluation plans as part of the Final Performance Report until Fall 2025, when the 2020 grantee cohort will begin submitting their Final Performance Reports.

Changes from 60-Day to 30-Day Package

No changes.

2. Addition of a data element related to mode of instruction.

Public Comments

Two (2) public comments expressed concerns about collecting data related to mode of instruction:

- One comment cited that in person, distance/remote, and hybrid instruction and services may overlap or change frequently according to students' needs.
- One comment noted that it is not CAMP projects, but rather Institutions of Higher Education, that determine the mode of instruction, and thus this data would not be relevant for CAMP.

ED Response

The Department appreciates the feedback from commenters regarding the addition of this data element. The Office of Migrant Education (OME) will provide technical assistance to grantees before the APR due date about how to report students who receive multiple instructional modes throughout the year (for example, students receiving in-person instruction who switch to online instruction within the same performance period).

OME recognizes that IHEs, rather than projects, typically determine the mode of instruction. OME intends to collect the data for use in observing national trends that could have an impact on aggregate results. Even if the mode of instruction is determined by the Institution of Higher Education and not the CAMP project itself, the data can still serve the purpose of providing insight on national trends.

Changes from 60-Day to 30-Day Package

OME has clarified the options for instructional mode, as the original options were not fully inclusive of full-time and part-time students. "Full-time in person" is now written as "In-person only," to include both full-time and part-time students that attend instruction solely in person. See pages 24-25 of the proposed CAMP APR Instructions.

OME has also added clarification to distinguish "Commuter students" from "Distance/remote learning" to the CAMP Instructions and APR Data Form. See pages 24-25 of the proposed CAMP APR Instructions.

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

Public Comments

Two (2) public comments were related to removing the data collection of standardized test scores (SAT and ACT).

- One comment was against removing this data collection because although their institution currently does not require SAT or ACT scores, the institution will begin requiring them next year to determine the level of preparedness of high school seniors. The comment noted after the COVID-19 pandemic, students are less academically prepared, and services may need to adjust accordingly.
- One comment was in support of removing this data collection because their institution does not use SAT or ACT scores to admit or place students.

ED Response

The Department appreciates the feedback from commenters regarding the removal of this data element. OME proposes removing the data element because only a small percentage of grantees currently report SAT or ACT scores. In 2022, 12 out of 55 (22%) of grantees reported using SAT scores and 12 out of 55 (22%) of grantees reported using ACT scores. Of those numbers, eleven (11) grantees used both tests, one (1) used SAT only, and one (1) used ACT only.

In addition, OME understands the collection of this data may create a burden for projects, because projects request the information from their institution.

If OME does not collect this information, projects could still use SAT and ACT data for their own purposes, including adjustment of services, if their institution is collecting and willing to provide the information to the project.

Changes from 60-Day to 30-Day Package

No changes.

COLLEGE ASSISTANCE MIGRANT PROGRAM ANNUAL PERFORMANCE REPORT ADDITIONAL CHANGES

1. Additional clarification of follow-up data

Changes from 60-Day to 30-Day Package

OME has clarified the definition of Item A4, the number of CAMP first academic year completers for whom follow up data was collected. On page 18 of the CAMP APR Instructions, “Follow-up contact was successfully made” was replaced with “the grantee was able to collect follow-up data.”