

## **Comments the TRIO Training Program Application Package (OMB Control No. 1840-0814)**

The TRIO Training Program provides critical professional development for personnel engaged in the Federal TRIO Programs. This review focuses on areas of operational clarity, equity in access, evaluation standards, and alignment with emerging trends in training delivery. The goal is to support the Department of Education's ongoing commitment to program improvement and effective service to disadvantaged populations.

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### **Section I: Clarity and Transparency**

#### **1. Prior Experience Scoring Transparency**

The application references the use of Prior Experience (PE) points (34 CFR 642.22), yet it does not clearly define how these points are calculated or applied. This creates ambiguity for returning applicants and potential disadvantage for new applicants.

*Recommendation:* Develop and include a standardized rubric or scorecard for PE evaluation within the application package or FAQs.

#### **2. Training Modality Definitions**

The Training Program Profile Form lists various training types (in-person, hybrid, synchronous, asynchronous) without consistent definitions. This leads to varied interpretations and inconsistencies in reporting and evaluation.

*Recommendation:* Include a glossary or appendix with definitions and examples for each training modality.

#### **3. Selection Criteria Scoring Rubrics**

While selection criteria are outlined, the absence of scoring rubrics limits applicant understanding of what constitutes an exemplary response.

*Recommendation:* Provide a reviewer scoring guide with descriptive benchmarks (e.g., exceeds expectations, meets expectations) to enhance transparency and consistency.

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### **Section II: Equity and Accessibility**

#### **4. Equitable Access for Under-Resourced Institutions**

Although geographic distribution is considered (34 CFR 642.23), the application does not include mechanisms to support smaller, rural institutions or Minority-Serving Institutions (MSIs).

*Recommendation:* Consider implementing bonus points or a competitive preference for MSIs, new applicants, or applicants from underrepresented regions.

#### **5. Culturally Responsive Frameworks**

Equity considerations are embedded under the "Plan of Operation" but are not distinctly evaluated.

*Recommendation:* Introduce a sub-criterion assessing applicants' integration of culturally responsive frameworks in training curricula.

#### **6. Integration of GEPA Requirements**

Section 427 of GEPA is treated as a compliance checkbox rather than an integral component of program design.

*Recommendation:* Encourage applicants to explicitly incorporate GEPA strategies into their project narratives and training approaches.

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### **Section III: Evaluation and Outcomes**

#### **7. Limitations of Standardized Objectives**

The application relies on two quantitative standardized objectives related to participant satisfaction and perceived knowledge gains. These alone may not capture training effectiveness.

*Recommendation:* Permit optional qualitative or longitudinal indicators (e.g., behavior change, program improvement) for more comprehensive evaluation.

## 8. Use of Logic Models or Dashboards

Applicants are not explicitly encouraged to utilize visual planning or outcome tools such as logic models.

*Recommendation:* Provide templates or encourage submission of logic models, dashboards, or other evaluation frameworks.

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## Section IV: Innovation and Modernization

### 9. Integration of Emerging Technologies

While educational technology is mentioned, the application does not highlight the use of advanced tools like AI, gamification, or virtual simulations.

*Recommendation:* Revise the invitational priority or guidance to explicitly encourage integration of emerging technologies in training delivery.

### 10. Weight of Invitational Priority

The invitational priority does not influence funding decisions, reducing motivation for innovation.

*Recommendation:* Consider assigning bonus points or transforming the invitational priority into a competitive preference in future cycles.

### 11. Open Licensing and Dissemination

Although grantees must openly license deliverables, there is no centralized platform for sharing training products.

*Recommendation:* Establish a TRIO Training Materials Repository on ED.gov to ensure public access and promote program-wide knowledge sharing.

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## Section V: Operational Flexibility

### 12. Application Limitations by Priority

Applicants are restricted to one submission per absolute priority, limiting the ability to propose integrated or interdisciplinary training approaches.

*Recommendation:* Permit modular or multi-priority proposals where appropriate, especially for interconnected training topics.

### 13. Clarity on Leveraging Resources

The concept of leveraging non-project resources is referenced in scoring but not clearly defined.

*Recommendation:* Provide examples (e.g., in-kind support, institutional partnerships, external certifications) to guide applicants.

### 14. Grant Duration and Planning

The 24-month project period may restrict depth and sustainability of impact.

*Recommendation:* Pilot a 36-month grant option with a midterm progress review to support iterative development.

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## Summary of Recommendations

| Area                    | Key Recommendation                                           |
|-------------------------|--------------------------------------------------------------|
| Prior Experience        | Publish scoring rubric for transparency                      |
| Training Modalities     | Provide consistent definitions and examples                  |
| Equity                  | Include preferences for MSIs and equity-centered design      |
| Evaluation              | Allow for additional qualitative and longitudinal metrics    |
| Innovation              | Encourage use of AI, gamification, XR, and modern tools      |
| Operational Flexibility | Permit modular proposals and longer grant durations          |
| Open Licensing          | Develop a central repository for grantee-developed materials |

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