COUNCIL for OPPORTUNITY in EDUCATION

Dedicated to furthering the expansion of collegeopportunities for low-income, first-generation students, andstudentswithdisabilities.

May 18, 2026

Ross Santy,
Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of
Education 400 Maryland
Ave, SW Washington DC,
20202

Dear Mr. Santy,

Thank you for the opportunity to review the research protocol, the survey instruments in Parts A and B, and the attachments. After reviewing the information and consulting with experts in survey methods, personnel familiar with the data associated with TRIO programs (via the Annual Performance Reports), and personnel who run TRIO programs, we have serious concerns about the study design, the instruments, and the methods proposed in the package. In short, we do not believe that the instrument, as designed, will be able to answer the research questions proposed for the descriptive study. More concerning, the inability to answer many questions that require high levels of detail and specificity will give a false sense of data accuracy, given the precision required to answer questions. As a result, the instrument's design will lead to unacceptable levels of measurement error, especially when the survey asks respondents to take an educated guess.[1] In short, there is a gap between what the survey intends to ask and how the respondents will interpret it. There is no shared understanding of the constructs being measured between the survey designers/ researchers and those who run the TRIO programs. It is our hope that the feedback presented below will be helpful in refining the instruments or the study design.

The main concern about the study's design is that the instrument appears to have been designed without the necessary information to inform how the questions needed to be crafted to achieve the desired information. This resulted from a failure to test the instrument using generally accepted practices in survey research for this kind of expensive, large-scale survey (Dillman et al., 2014; Groves et al., 2009). As a result, respondents will not have a collective understanding of what is being asked in the questionnaire items, and they will not respond in a standardized way.

RESPONSE: Pretesting was conducted while the 60-day notice was posted on the Federal Register, and we incorporated those findings into the revised instrument. We also solicited public comments through the 60-day notice period to further refine the design of the instrument.]

Moreover, many of the questions asked require information that grantees do not readily have available. The following factors complicate the ability to answer questions in the survey instrument:

Variation of Services. Each individual TRIO site is designed to address the local needs of students and the community, and services are tailored to those needs. Implementation of these services differs greatly by site. This is not captured in the instrument.

RESPONSE: The study is designed to be descriptive in nature, with the primary goal of documenting the variation in services provided across and within TRIO programs and the variation in the costs and intensity of these services. These variations have not been systematically documented across all TRIO programs.

Variation of Student Needs. The instrument does not account for the types of students needing services. Some students, such as high-ability first-generation students, may only need encouragement, a referral, or documents to help them meet program outcomes. Others, such as students with learning disabilities or low-income students who require additional resources, may require a significant amount of time to achieve the same outcomes. As such, programs with higher-need students will have higher costs per participant, while others may be lower simply because of demographics. The instrument does not ask questions about the students being served to understand these cost structures.

RESPONSE: The Department agrees that participant populations differ across TRIO sites and that these differences may influence both service delivery and program costs. The Department's goal is to produce a descriptive report that documents the variation in services provided across and within TRIO programs and the variation in the costs and intensity of these services.

Variations in Cost of Living. The cost of living in some states is low, allowing programs to hire more staff and provide similar services in higher-cost areas. As a result, the cost participant will differ between areas with lower and higher cost of living. The documentation does not detail how administrative data will be used from other sources to address these cost differences.

Variations in Community. Some states have additional challenges when providing services. Sites in rural areas can have higher per-student costs than those in urban areas due to higher transportation and other costs.
Alaska, for example, will have higher costs simply because of the difficulty of accessing parts of the state, which often requires a flight.

RESPONSE: The Department recognizes that geographic and community factors—including cost of living, rurality, transportation burden, and regional labor market differences—may affect program operations and costs. The primary goal of this descriptive study is to document the variation in services provided across and

within TRIO programs and the variation in the costs and intensity of these services. In the future, we will explore the extent to which extant data can be used to provide further context about this variation.

In addition, the most glaring problems with the instrument involve the design of the first set of questions in section A, which is used later on in the survey to allocate budget, time, and dosage. First, the list of services listed in section A, confound two constructs – one is the content of services (e.g., tutoring in English, math or other subjects; assisting with college applications, financial aid, or other transitions; assistance accessing social services; exposure to cultural events, etc.) and the second is the type of service itself (e.g., individual counseling, group counseling, workshops, peer programs, etc.). This causes problems for respondents. For example, if a respondent provides academic tutoring for groups of students, do they classify the service under "tutoring" or "academic advising and support"? Such decisions have ramifications for the budget and effort questions later in the survey. This leads to measurement error for each question response and, subsequently, for any derived or calculated variables.

RESPONSE: The service categories included in the instrument were developed based on TRIO legislation outlining required and permissible services for each program, a review of grantee websites to see how grantees described their services, and consultation with subject matter experts. During pretesting, respondents generally demonstrated a shared understanding of the categories and did not report substantial difficulty assigning services to categories, with limited exceptions that informed subsequent revisions to question wording and definitions.

Second, respondents are unlikely to have the information required to answer the detailed questions in the survey. The survey will most likely go to Project Directors. Many project directors oversee multiple programs, and others have staff who provide services or collaborate to provide services through referrals. As such, since TRIO budgets are largely based on staffing hours rather than services provided, cost-by-service information may not be readily available. Since it is not part of the grant requirements to track hours or funding by service in the way requested, many administrative tracking systems don't have this data either. As such, providing an estimate based on services provided 2-years earlier about the percentage of the budget and time spent per service is speculative and likely to result in a high level of measurement error.

RESPONSE: The Department recognizes that some Project Directors may need to consult with other program staff and may need to reference administrative records to complete portions of the survey. To support accurate reporting, the survey instructions and respondent materials have been updated to clarify that consultation with relevant staff is encouraged, where appropriate. In addition, based on feedback during pre-testing, the survey has been updated so that it does not ask the respondent to estimate costs per service directly, as we understand TRIO budgets are not structured this way. TRIO grantees' budgets typically have the following categories: personnel, fringe benefits, travel, equipment, contractual, construction, other direct costs, indirect costs, and training stipends. For most grantees, the largest costs are typically costs associated with staff in the personnel and fringe benefits category. This is why section B now asks respondents to describe their expenditures for each staff member and then estimate how staff spend their time across activities. We also ask respondents to estimate how much they have spent from other budget

categories (not related to staffing) on each service. Breaking down costs in this way is intended to make it easier for respondents to provide the information needed to estimate how much grantees spend on different services.

These two issues are likely to cause unacceptable measurement errors yielding inaccurate estimates, even if it comes from a Census with no sampling error. Measurement error will be amplified when using multiple estimates from the survey to complete the cost-per-service and cost-per-participant metrics. Some measures may require two to three separate calculations to get to the final number.

RESPONSE: The Department acknowledges that using a survey to generate estimates to answer the research questions will result in some measurement error. However, we do not have any reason to assume that measurement error will be systematic in this survey. Since random measurement error does not *bias* the average estimate, we do not believe the results of the descriptive study will be "inaccurate." The results will reflect an unbiased estimate of the average costs of services for programs. Random measurement error will cause larger variance around the average estimate, which could lead to weaker correlations between services and inputs, such as student population served, or outcomes, such as enrollment in college. However, those types of analyses are not included in the research questions and are not part of the analytical approach to the descriptive study.

Given these severe challenges to collecting accurate, reliable data, we encourage the Department to revise the study's design. For high-cost, large-scale federal surveys, it has previously been standard practice to use methods that improve reliability and reduce measurement error in the survey instrument. Many of the issues and concerns listed above are likely due to the instrument not undergoing these procedures. We recommend revising the study design to assess the instrument's reliability, validity, and feasibility. We recommend that you conduct focus groups, structured interviews, and cognitive interviews (beyond nine people). After conducting these tests and improving the instrument, we recommend a pilot test with a protocol that resurveys the instrument to a small percentage of respondents. This will allow you to validate the constructs you intend to measure and test their reliability (via the retest).

To assist with this process, COE has developed several attachments for your consideration. Attachment A provides high-level feedback about the challenges in implementing the instrument as is. A successful research study will need to address all of these issues. Attachment B proposes thoughts for how questions in section A of the instrument may be asked to separate the two concepts being measured. If you must measure the types of services being offered, it should be done regardless of the content of the service (whether the workshops, one-on-one sessions, group sessions, or other activities cover financial aid, tutoring by subject, cultural exposure, etc.). While it will likely improve the instrument, Attachment B will still need to undergo design testing. Attachment C provides a list of open-ended questions that may be used in a Qualitative Interview Protocol. A qualitative research design should precede a full-scale study, and we would recommend that it be part of this first study round (a full-scale survey design incorporating what is learned in the first phase can be employed later). Finally, Attachment D provided recommendations on an alternative study design that does not rely on the Project Director to provide the data necessary to answer the questions in the study.

RESPONSE: The Department appreciates the suggestions provided for alternative survey questions and open-ended questions for focus groups. We will consider how those could improve the process. However, the overall approach proposed would extend the timeline for gathering systematic information, increase burden on TRIO program staff, and still be subject to some measurement error.

We appreciate the opportunity to provide this feedback and improve this very important study for the TRIO community and support your effort to gather evidence on the efficacy of TRIO programs. We want to ensure that any research study or evaluation is as accurate as possible and that is designed to improve student outcomes. Please don’t hesitate to contact me should you have any questions about these recommendations.

Sincerely,

Kimberly Jones
President
Council for Opportunity in Education

ATTACHMENT A

High-Level Feedback and Challenges

The following list includes specific feedback from experts in survey methods and in TRIO. A successful study will need to address all of these challenges:

1. Directors will not have the details necessary to complete the survey as many have staff providing these services. If they don't consult with staff working with students, they will need to make guesses and assumptions about the allocation of staff time by services offered. These assumptions will vary widely and will not accurately reflect the one-on-one interactions between the staff working with students, increasing measurement error to unacceptable levels.

   RESPONSE: The Department agrees that Project Directors may need to consult with program staff or administrative records to respond to certain items. The survey instructions and advance materials have been updated to encourage respondents to consult relevant personnel and records, as needed, to complete the survey.

2. The survey designers are not aware of how the budgets for the TRIO programs are constructed and how it is a difficult, if not impossible, task to tease out the activities as they are presented, because none of this information is tracked and TRIO staff don't focus their labor hours within one of these discrete categories – rather, they likely touch many or all of them.

   RESPONSE: The Department recognizes that TRIO budgets are not typically organized according to the service categories used in the survey and that respondents may need to provide informed estimates rather than exact accounting allocations. During the 60-day review period, the survey instructions have been updated to explicitly start with asking respondents to enter the costs associated with each staff member from their budgets. Next, the survey asks respondents to estimate for each staff member what percentage of their time is spent on each service. Respondents are encouraged to provide informed estimates when exact allocations are unknown. To achieve the Department's goal of efficiently producing a descriptive report that addresses these questions while minimizing burden on TRIO staff, the study seeks to collect approximate program-level distributions of how much grantees spend on each service and how much of each service participants typically receive in order to describe broad patterns of service delivery nationally, while balancing the level of detail requested against respondent burden.

3. Cost sharing is not accounted for in the instrument. If an institution supplements funds to serve more students or to provide enhanced services, how should those funds be accounted for when answering the questions in the survey instrument?

   RESPONSE: The study is focused on the use of TRIO grant funds in order to align the data collection with the federal funding source under study. Respondents are

therefore instructed to report expenditures and activities associated with TRIO-funded services, rather than attempting to comprehensively account for all institutional or external supplemental resources.

4. The list of service categories isn't discrete from each other, making it difficult to assess the percentage of time spent on each service. This will also lead to measurement error, as one director may categorize a service under one category and another program director under another. Here are some examples to consider:

    - It is unclear why "Tutoring" is a separate category from "Academic Advising and Support." If a program provides tutoring for small groups of students, where do they place this activity?

    - College entrance examination preparations, classes, and support could be mixed in with Academic Advising. How would programs separate these two activities out?

    - If tutoring or academic workshops involved mentoring or were facilitated by other students, would that fall under mentoring, tutoring, or academic services?

    RESPONSE: The service categories were informed by program authorizing legislation, a review of grantee websites to see how grantees describe their services, and input from subject matter experts. Underneath each of the broad categories of services in Section A, such as "Academic Advising and Support," we provide more specific lists of activities to help respondents differentiate these broad categories. During pretesting, respondents generally did not report major challenges categorizing services. We did, however, identify a few areas requiring clarification. We have implemented changes to the instrument to address the feedback we received during the review window.

5. The list of service categories confounds two separate constructs: the pedagogy or method to disseminate information and the content or the topic areas covered. Tutoring, mentoring, classes, workshops, and teaching are methods to disseminate information, whereas financial literacy, career planning, learning about college, and financial support are topics. When you combine these two constructs, responses will be inconsistent by site. If a student were to attend a workshop, for example, multiple topics across these topic areas can be covered. In fact, it is likely that multiple content areas will be covered because some TRIO programs may only have two or three single encounters with a particular student or client. As such it may be difficult to get the adult's or student's attention second time.

    RESPONSE: The study is intended to capture broad categories of services commonly provided through TRIO programs rather than develop a fully independent taxonomy of service delivery mechanisms and content areas. The categories reflect how services are described in program legislation and operational practice. Feedback from pretesting informed revisions to improve clarity where respondents identified potential overlap or ambiguity.

6. The instrument fails to recognize the diversity of students covered by these services. There

are some highly skilled, motivated students who can be academically successful but lack information, who only need encouragement. Other students, such as those with learning disabilities or in low-resourced high school districts, require a high level of effort to achieve the outcomes expected of the TRIO program. This instrument treats all sites the same. As a result, you are likely to see a high variation of costs without an understanding of why that is the case.

RESPONSE: The Department agrees that participant needs vary substantially across sites and may influence both service intensity and costs. The Department's primary goal of this descriptive study is to document the variation in services provided across and within TRIO programs and the variation in the costs and intensity of these services..

7. The burden estimate of 40-60 minutes greatly underestimates the time to complete the survey. The respondent will need to contact others and may need to spend time computing estimates of time spent. It will likely not take one sitting. The estimate does not take into account the extra time it will take for program directors to get information from a variety of sources, such as data systems and individual staff members who work directly with students. Additionally, the estimate does not take into account the time that subordinate staff will need to respond to certain survey items (like time spent servicing students). The real burden estimate will likely be 3-4 times higher than what is presented in the package.

   RESPONSE: Based on pretest feedback, the study team revised the instrument to reduce burden, including removing and simplifying selected items and clarifying instructions. The final burden estimate was modified to reflect direct survey completion time, as well as the anticipated time spent reading outreach materials, gathering documents, and consultation with staff or records.

8. The incentive will likely not be effective. TRIO directors may not be able to accept the incentive due to an employment restriction on accepting gifts. If, instead, you were to offer an incentive to the program like advising materials, books, or an online subscription in line with the goals of the TRIO program, you will likely be more successful. Past PRA submissions show that OMB may also be more willing to provide a higher-dollar incentive to a program than to an individual respondent.

   RESPONSE: The Department appreciates the suggestions for alternative incentives. The study budget does not allow for a significant increase to the incentive amount; however, we have proposed to increase the incentive amount to $50 to align with the expected burden. Recipients are given a choice of businesses when selecting an electronic gift card, including a VISA gift card, which the respondent can utilize toward the purchase of items for the program, such as books or online subscription services.

9. The instrument does not distinguish between required and permissible services. This distinction is important because false conclusions may result if services required by law are conflated with those allowable by law as the latter may not be provided at all.

   RESPONSE: The survey was intentionally designed to capture both required and

permissible services in order to describe the full range of activities implemented across TRIO programs. The goal was not to distinguish between these types of services.

10. The instrument does not ask about the grade level that is being served. A high school student in the 9th grade, for example, will receive different services than a student in the 11th or 12th grade, yielding different costs per student. The same is true of students at the middle school and collegiate levels.

    RESPONSE: The Department agrees that participant needs vary by grades/ages served. However, data on participants' grades and ages is available in grantees' Annual Performance Review (APR) data and does not need to be collected by the Department in a survey. Additionally, the Department's primary goal of this descriptive study is to document the variation in services provided across and within TRIO programs and the variation in the costs and intensity of these services.

11. The instrument does not account for allowable administrative costs that will be classified as "other" in the percentage allocations. For example, EOC can spend up to 50% of their time in recruiting students and some program directors may classify those activities as "other" while others will try to classify recruiting costs under a one of the service groups. In another example, staff for Upward Bound spend a lot of time engaging in logistical planning in preparation for the mandatory summer programming. In Student Support Services, some listed services are not allowable charges against the grant if the college or university already provides them. (In such cases, the SSS program refers out the student.) Not properly accounting for these activities may result in erroneous conclusions about the use of funds.

    RESPONSE: The Department recognizes that programs may differ in how administrative activities are classified. To improve consistency, the revised instrument includes more detailed instructions on how to categorize these types of administrative tasks, including examples such as those described in the comment above in the category descriptions.

12. Focusing on the grant period from a previous academic year increases measurement error due to problems in recall. The survey should be updated to reflect the 2025-26 grant year in order to get the most up-to-date and accurate information. Any administrative data in the APR can be matched after the collection occurs. The previous year's APR data can be used as a guide for the researchers until the new data is submitted.

    RESPONSE: The selection of the reference grant year was discussed extensively with the study's Expert Advisory Panel and other stakeholders. Although more recent data may reduce recall burden, the study team determined that the 2024–25 grant year would better reflect typical program operations and reduce the likelihood that findings would be influenced by unusual or transitional conditions affecting the current grant cycle.

13. The timing of the proposed study is not ideal as it is during APR seasons for many

programs. For example, when SSS programs are recruiting participants, many other activities stop because if recruitment fails, basic outcomes are not met. Similarly, the summer represents the most challenging time of year for programs such as Upward Bound and Upward Bound Math-Science. The timing of data collection should be tailored to the specific program grant cycles.

RESPONSE: The Department recognizes that operational demands vary substantially across TRIO programs and across the academic calendar. In developing the data collection schedule, the study team considered program cycles, respondent burden, and feasibility constraints. While no single field period eliminates burden for all program types, the planned schedule is intended to balance these competing considerations and will include advance communication and flexible response windows to support participation.

14. Response rates may decline if the survey is not clearly understood to be an independent research effort led by the Institute of Education Sciences (IES). The involvement of program offices or political appointees who have publicly questioned the future of TRIO programs could contribute to concerns among respondents regarding the purpose and use of the data. To support respondent confidence and participation, additional steps should be taken to communicate that the data collection is being conducted in good faith by the contractor and IES, with the objective of identifying effective and evidence-based approaches to the use of TRIO funds, rather than for political purposes.

    RESPONSE: The Department appreciates this feedback and recognizes the importance of establishing respondent trust and transparency regarding the purpose of the study. The study introduction, advance materials, and respondent communications have been revised to more clearly describe the independent research role of IES and the contractor, the study's evidence-building objectives, applicable confidentiality protections, and the planned reports and data products summarizing findings that will be publicly available.

ATTACHMENT B

Revising Questions in Section A

The example below is for Student Support Services. Questions A1a and A2 need to be customized for how the law is written for the individual TRIO programs, plus any additional services that are permissible but with more detail (this information should come from qualitative interviews). It is recommended that nothing covering content be used for developing cost estimates. Also note our recommendation that you ask for data for the current academic year, which is a best practice in survey design (see Dillman et al., 2014). Asking for information from years prior greatly increases measurement error. While the activities in A3 may provide a cleaner way to determine service costs, the data will still be difficult for Directors to provide. See Attachment D for alternative designs that may help you get defensible estimates.

A1. Were there any **MANDATORY** services that you were **NOT ABLE** to offer during the 2025-26 grant year.

- Yes
- No

A1a. [IF A1=Yes] Indicate which services you were NOT able to offer during the 2025-26 grant year.

- Academic tutoring
- Advice and assistance in postsecondary course selection
- Advice and assistance in accessing financial aid
- Education or counseling services
- [IF 2-year institution] Assisting students applying for admission to, and obtaining financial assistance for enrollment in four--year programs.

A2. Which of the following permissible services did your [PROGRAM_NAME] program offer in the 2025-26 grant year?

- Individualized counseling
- Exposure to cultural events and academic programs not usually available
- Mentoring programs
- Providing social services support (obtaining housing during breaks, accessing welfare benefits, etc.)
- Other Service (including outside the scope of academia, e.g., mental health/emotional support)
    - SPECIFY

A3. How did you provide the services (whether in-person or through the use of technology)?

- Individual counseling or tutoring
- Group counseling or tutoring
- Workshops (clarify differences with group)
- Peer programs
- Academic instruction (courses)
- Readings/Website Resources
- Referral to University or Local Resources

ATTACHMENT C

Potential Questions for a Qualitative Research Protocol (Cognitive Interviews, Focus Groups, etc.)

1. If I were to ask you what services you provide, what would you say?
2. Think of a student who needs a high level of services. Without identifying who the student is, describe the student's characteristics and the services you provided.
3. Think of a student who needs a low level of services. Without identifying who the student is, describe the student's characteristics and the services you provided.
4. When thinking about the services you provide, what is the mix of students requiring high levels of service vs. low levels of services?
5. What limitations (if any) prevented you from providing full services (e.g. time, money)?
6. How much time during the academic year do you spend hands-on/working with students versus preparation or logistics for events or services?
7. Are resources outside of the immediate TRIO program used in conjunction to support students? If so, who/what are the resources (e.g., school, community) and what services are they providing?
8. What are the top services that you refer students to and may not be reflected in TRIO grant spending?
9. If your TRIO program completely funded through federal grant dollars? Does [INSTITUTION NAME] provide resources for additional programming or to serve more students? Do external monies (e.g., community foundation grants, private donations) provide resources for additional programming or to serve more students? How do you account for TRIO funds versus supplemental funds?
10. If I were to ask you to provide a cost per service, how would you do that?
11. Describe a time when there were unanticipated costs associated with running the program. How were these costs addressed?
12. What are the biggest factors that may increase or decrease the cost of services provided to students?

ATTACHMENT D

Design Considerations

As noted in the cover letter, the design of the study is not likely to yield accurate information regarding costs per service or time spent on services because (1) the information is not required to be collected at that level, (2)the person likely filling out the survey is not necessarily the staff who are providing services, and (3) [the questions are not directed towards an appropriate time reference]. The instrument also fails to account for administrative or preparation costs (like preparing for formal programs, preparing for summer experiences, logistical planning, etc.). Suggested below are methods that may be more successful, but will likely have to be field tested.

1. **A time-use survey**. A time/use survey is probably the most accurate way to assess the labor-hours used to provide services to students. Using sampling techniques directed to staff providing services, and aggregating the findings nationally, survey staff can understand the labor costs and supplement it with other direct costs collected for the study in another survey instrument. In the design from the American Time Use Survey (https://www.census.gov/programs-surveys/atus.html), the problems of recency embedded in the proposed design of the current survey are addressed by asking about time spent in the last 24 hours. In this case, we can ask about the last business day. The survey may need to be strategically timed or conducted multiple times in order to address the different academic cycles by program.

2. **Administrative data collection**. With some lead time and clear, standardized definitions developed in conjunction with the community, a collection can be embedded into standard operating procedures to collect better data by service type.

3. **Two-stage survey design**. Instead of requesting data from the program director, we recommend that the project director administer targeted, shorter surveys to the staff who actually provide the services.

REFERENCES

Dillman, D. A., Smyth, J. D., & Christian, L. M. (2014). *Internet, phone, mail, and mixed-mode surveys: The tailored design method.* John Wiley & Sons, Inc.

Groves, R. M., Fowler Jr., F. J., Couper, M. P., Lepkowski, J. M., Singer, E., & Tourangeau, R. (2009). *Survey Methodology (Second Edition)*. John Wiley & Sons, Inc.