Response to Council for Opportunity in Education's (COE) public comment on FR doc # 2025-05419 – Submitted by Kimberly Jones, President, COE

The Department of Education appreciates the comments submitted during the 60-day public comment period for the proposed Information Collection Request (ICR) titled *Description of Today's TRIO Programs and Proposing Options for Future Evaluations* (OMB Control Number 1850-NEW). The Department received two comments, but only one raised concerns about the design of the descriptive study and the survey instruments and made recommendations for a different approach to the study. The Department has carefully reviewed all input and provides the following formal response.

The comment submitted on behalf of COE provides a set of overarching concerns about the study. We summarize those concerns and provide a high-level response followed by responses to specific points raised. We address each comment below keeping in mind the research questions presented in Part A of the OMB package:

1. What services do grantees provide and how much does this vary across grantees within programs?
2. What share of participants receives each service and how intensively?
3. How much do different types of services cost?
4. What is the cost per participant on average for each type of service and how much does this vary across grantees within programs?
5. To what extent do grantees track implementation and interim progress and to what extent do they use these measures to improve?

The government's goal is to efficiently produce a descriptive report that addresses these questions while minimizing burden on TRIO staff.

Summary of concerns raised in public comments:

1. The survey instrument was not created with the input of focus groups or pretested with TRIO Project Directors or staff and therefore the items are not valid or reliable.

The survey instrument was initially developed through a review of TRIO legislation, Annual Performance Report (APR) data elements, and information collected from TRIO program websites to ensure alignment with statutory and programmatic requirements and included input from a panel of experts in higher education research and TRIO programs. This information was included in the OMB justification package submitted for the study.

During the 60-day public comment period, the Department conducted a focus group of TRIO Project Directors and used their feedback to refine the approach for gathering information on budget and staff time spent on services. Further feedback was gathered via pre-testing of the revised survey instrument with TRIO Project Directors, consistent with OMB guidance for this type of data collection. Because the survey primarily consists of factual, descriptive, and administrative questions rather than multi-item psychometric scales intended to measure latent constructs, this form of pre-testing is an appropriate method for assessing question clarity, respondent interpretation, burden, and overall usability of the instrument. Public comments and findings from the pre-test may result in revisions to the survey instrument, which will be reflected in the final OMB package.

2. The survey will have substantial measurement error, because it asks detailed questions about services, respondents may not understand how to categorize all their services, and respondents may have difficulty estimating how much of the budget is spent on each service.

The comment expressed concern that grantees may not understand how to categorize their services, given services can vary across grantees. It also noted that TRIO Project Directors, who are the proposed respondents, may not have the necessary information accessible to answer the question and will need to consult with others (for example, to understand how staff spend time with students).

First, during the 60-day review window, we pre-tested the survey to obtain direct information from a set of TRIO Project Directors about their ability to categorize their services, their confidence in their estimates where they needed to estimate, and information about whether they needed to consult with others to complete the survey. 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. In addition, based on feedback received during pre-testing, we have updated the survey so that it does not ask the respondent to estimate costs per service directly, as we understand TRIO budgets are not structured this way. For most grantees, the largest costs are typically costs associated with staff. We now ask respondents to describe their budget allocations for staff and then estimate how staff spend their time across activities. 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.

Second, because measurement error always exists in survey responses—even with valid and reliable items—we agree that using a survey to generate estimates to answer the research questions proposed above will result in some measurement error. However, we do not have any reason to assume that measurement error will be systematic. 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. This 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 above and are not part of the analytical approach to the descriptive study.

The comment suggests that the most accurate way to collect information about costs would be to use a time-use survey of staff providing TRIO services, similar to the American Time Use Survey. However, a time use survey would extend the timeline for data collection, pose a large burden on TRIO staff, and would still have some measurement error.

3. Important items are not included in the survey, such as characteristics and needs of the students served, and community context. The study will not be able to address why services and costs per service might vary across programs and grantees.

The comment expresses a concern that the survey does not capture the fact that services may vary across grantees because of differences in the needs of students across grantees. It also indicates that the survey does not gather information about the types of students served by different grantees or explain whether these factors will be considered in analyses conducted for the descriptive study.

The primary goal of the 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. These variations have not been systematically documented across all TRIO programs. We will also explore opportunities in the future to meaningfully use extant data to explore variation in contextual factors (e.g., cost of living, rurality, transportation burden, and regional labor market differences) that may be associated with costs.

Finally, we appreciate the suggestions provided for alternative survey questions, and open-ended questions for focus groups. We will consider how those could improve the process.