



## National Council for Community and Education Partnerships

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December 21, 2023

Kun Mullan  
PRA Coordinator, Strategic Collections and Clearance  
Governance and Strategy Division, Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202-4537

Re: Public Comment Request, Final Performance Report for the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP). OMB Control No: 1840-0782. ICR Reference No: 202307-1840-002.

Dear Ms. Mullan:

On behalf of the National Council for Community and Education Partnerships (NCCEP), the national nonprofit association representing the state agencies, institutions of higher education, and K-12 school districts that comprise the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grantee community, we are pleased to share our perspective on the proposed information collection regarding OMB Control Number: 1840-0782, ICR Reference Number: 202307-1840-002.

Our public comment submission will be comprised of multiple sections. First, we will acknowledge our support for the revisions made to the Final Performance Report (FPR) document and signify our agreement with select changes. Second, we will address our continued concerns related to the reporting burden associated with the proposed questions addressing federal and non-federal scholarships provided to GEAR UP students. Third, we will provide additional commentary and recommendations referencing specific questions and page numbers from the proposed FPR as revised in ICR Reference Number: 202307-1840-002.

### Support for Revisions

Overall, we are very pleased with the considerate and collaborative approach the U.S. Department of Education (ED) has taken with addressing many of NCCEP's concerns and suggestions related to the FPR. NCCEP appreciates ED's efforts to provide to renumber the FPR document, provide character counts, ensure consistent terminology throughout the document, and improve instructions for grantees for select questions.

## Impact of the Proposed Scholarship Reporting Requirements on Reporting Burden

NCCEP reasserts serious concerns about the impact of the scholarship reporting requirements of questions #13-16 (previously questions #5-8) on the reporting burden for grantees. NCCEP reiterates its stance that the GEAR UP grantees have varied capacity to respond to questions #13-16 due to a lack of access to repositories of non-federal scholarship award data; a lack of data sharing agreements with the necessary agencies, institutions of higher education, and other scholarship providers; and the reliance on—to varying degrees—relationships with students to secure the necessary data. We urge ED to consider the following recommendation:

- **Allow grantees required to respond to questions #14 and #15 a minimum of two years to build the necessary data infrastructure.** While ED notes in their response to NCCEP's prior comments that applicants in 2019 were notified that there would be reporting expectations, the reporting requirements in the proposed FPR far exceed what was implied in the application. Based on our engagement with State grantees, few (if any) are prepared to accurately respond or provide evidence-based estimates to questions #14 and #15. Since the questions are focused on the prior grant years, grantees will likely be unable to respond to these questions at all, until the necessary data sharing agreements are in place. We strongly recommend that grantees be provided guidance at the time the FPR reporting portal is open that responding to questions #14 and #15 are optional until Spring 2026. This would allow grantees adequate time to get the necessary data sharing agreements in place during academic year 2023-2024, begin collecting or reconstructing data the following year, then be in a position to respond to the question correctly in 2026.

## Opportunities to Enhance the Quality, Utility, and Clarity of Information

- **Revisit Character Counts on Open-Ended Questions.** In the proposed FPR, most open-ended questions in Section II and Section III are limited to 1,000 characters. Given that 1,000 characters is typically less than 250 words, we believe this is insufficient space to respond to many of the complex questions being posed by the FPR. For example, identical questions in the APR (ICR Reference Number: 202308-1840-001) allow the respondent 2,000 or 8,000 characters to respond. We urge ED to revisit the character count allocations and allow grantees a minimum of 3,000 characters (approximately one page of text) to respond to open-ended questions, and at least 5,000 characters to respond to questions #14a-c and #15c-d in Section III.
- **Question 18, pp. 9-10: Race/Ethnicity**  
The question still needs revisions for clarity to specify if the grantee is responding across all grant years, or the final grant year. It is not clear from the instructions which students should be reported in the race/ethnicity table. NCCEP recommends clearly stating in the instructions if race/ethnicity data should be reported for 1) unduplicated, aggregate count of all students served over the duration of the grant, 2) unduplicated count for the final year of the grant (year 6 or 7), and/or 3) students served in the no cost extension

(NCE). Additionally, while ED's response to our previous public comment document states that there are no negative impacts to grantees if they do not have the information to answer this question, the instructions for the question indicate that the fields are "mandatory," and instructions should be revised to clarify that there are no negative impacts.

- **There are several instances where new questions must be phased in over time.**

Many of the new questions on the FPR are based on a reporting period that is the prior academic year, and there will be a brief transitional period where grantees may not have data from the prior academic year to report. As such, NCCEP strongly recommends that ED provide grantees with guidance on which questions can be optional and/or omitted until the 2024 and 2025 implementation of the APR, allowing grantees to build the necessary data infrastructure for accurate reporting moving forward. Specifically, NCCEP requests the following questions be optional in the first year of implementation and phased in over time to allow for the necessary infrastructure to be created to collect, manage, and report these data:

- Question #19, p. 11: Academic Engagement.
  - This question is new, so data on the academic engagement of students during the final year of the grant may not exist immediately. Grantees will need to amend their data sharing agreements to report in 2025 and beyond.
- Question #24, pp. 16-17: Postsecondary Persistence
  - This question is new, so data on the postsecondary persistence of students during the final year of the grant may not exist immediately. Grantees will need to amend their data sharing agreements to report in 2025 and beyond.

- **Ensuring consistency between the on-line and paper-based versions of the FPR.**

NCCEP appreciates ED's comments related to this issue. Even if previous intentions were to have consistency between the paper version of the FPR and the online system, each year there are a number of differences between data requested on the paper-based version and the online system. Additionally, there is no ability to overwrite pre-populated data. NCCEP will continue to reiterate the need for consistency across versions of the FPR and to allow permissions to overwrite pre-populated data or to cease pre-populating data on the FPR.

### Opportunities to Minimize Burden of Collection and Redundancy

In its current form, several of the FPR questions ask grantees to report on data that was already documented in prior APRs, when they should be focused exclusively on the final year of the grant.

- **Question #9, p. 7: Significant Changes in Project Design**

We recommend that ED either eliminate or narrow the scope of this question. Asking

grantees to report on all of the significant changes over a 6- or 7-year period adds to the reporting burden, and is redundant given that each grantee has been reporting on this question annually in the APR.

At a minimum, ED should revise the question to ensure that the question is narrowly focused on the final year (Year 6 or 7) of the grant, to complement what was previously reported in the APR.

**Recommended:** Please describe any significant changes in your project design during the final year of your grant (Year 6 or 7). How did these changes affect your budget, federal expenditures, and/or matching contributions?

- **Question #10, p. 7: Change to Role of Partners**

We recommend that ED either eliminate or narrow the scope of this question. Asking grantees to report on every partnership change over a 6- or 7-year period adds to the reporting burden, and is redundant given that each grantee has been reporting partnership updates annually in the APR and in prior approvals with ED.

At a minimum, ED should revise the question to ensure that the question is narrowly focused on the final year (Year 6 or 7) of the grant, to complement what was previously reported in the APR.

**Recommended:** Please describe any significant changes in your partnership roles or composition during the final year of your grant (Year 6 or 7). How did these changes affect your program?

- **Question #17, p. 9: Students Served**

Question #17 requires grantees to report on students proposed to be served for the duration of the grant, and actual number of students served in years 1-7. Grantees currently report the proposed number of students served and actual number of students served per year in each APR making this question redundant. To reduce reporting burden, it is recommended that this question be revised to include only:

- Number of students you proposed to serve during the final year of your grant (Year 6 or 7)
- Actual number of students served in the final year of your grant (Year 6 or 7)
- Number of students proposed to be served over the duration of the grant (Years 1-6 or 7), and

Actual unduplicated count of students served over the duration of the grant (Years 1-6 or 7).

NCCEP acknowledges the utility of cumulative questions, but continues to believe these questions are redundant and overly burdensome given the data are reported annually on the APR. Additionally, any major program changes including program deviations and partner roles

must be approved directly through ED. Therefore, each substantial change may be documented, at a minimum, three times during a grant cycle.

On behalf of the GEAR UP community, we would like to thank ED and OMB for their attention to our previous public comments related to the FPR. We also thank ED for the careful consideration of our additional recommendations. We appreciate ED's efforts to streamline and improve the FPR, while aiming to align it to the APR, and we hope that the recommendations provided here will help further that effort.

Sincerely,

A handwritten signature in black ink that reads "Alex Chough". The signature is written in a cursive, slightly slanted style.

Alex Chough  
President  
National Council for Community and Education Partnerships