



## **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, Annual Performance Report for Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP). OMB Control Number: 1840-0777.  
ICR Reference Number: 202308-1840-001.

Dear Kun 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: 1840-0777, ICR Reference Number: 202308-1840-001.

Our public comment submission will be comprised of three sections. First, we will acknowledge our support for the revisions made to the Annual Performance Report (APR) 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 APR as revised in ICR Reference Number: 202308-1840-001.

### **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 APR. NCCEP appreciates ED's efforts to provide to renumber the APR document, provide clear and consistent character counts, ensure consistent terminology throughout the document, and improve instructions for grantees for select questions.

Specifically, NCCEP agrees with ED's alignment between the APR and Final Performance Report (FPR) regarding race/ethnicity reporting, removing the requirement to report students served by more than one federally funded program, and eliminating questions related to postsecondary persistence. NCCEP also supports the requirement to report high school graduation rate and postsecondary enrollment, but only if these data will be relevant to and useful for Congressional/GPRA reporting.

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

Our prior response to the Docket No.: ED-2023-SCC-0126 included serious concerns about the impact on the scholarship reporting requirements in Section III, questions #13a-e (previously numbered questions #6a-e through 8) regarding the reporting burden for grantees. We urge ED to consider the following recommendations:

- **Allow grantees required to respond to question #13c 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 APR far exceed what was implied in the application. Based on our engagement with State grantees, few (if any) are prepared to accurately respond or provided evidence-based estimates to question #13c. Since #13c is focused on the prior academic year, 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 APR reporting portal is open that responding to question #13c is 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 data the following year, then be in a position to respond to the question correctly in 2026.
- **Remove question #13d from the APR.** While we greatly appreciate ED's revision to limit question #13d to grantees who received awards in 2023 or later, even with the revision, the question creates a reporting burden that far exceeds ED's estimates. Given that question #13d asks respondents to implement a complex forecasting process on an annual basis, we do not see how these series of questions benefit the grant monitoring or compliance processes. Taking into account the reporting burden, we strongly recommend that question #13d be removed from the APR, and instead ask grantees to simply report actual (rather than anticipated) scholarships on the FPR.

### Additional Recommendations for the Proposed GEAR UP APR

- **There are several instances where new questions must be phased in over time.** While NCCEP appreciates ED's comments reassuring grantees that there are no negative impacts if they do not have the complete information to respond to specific questions,

the APR does require grantees to sign acknowledgements certifying that information is “true and correct” and assuring that the grantee operates the GEAR UP program in “accordance with statute and regulations” and “in compliance with the terms and conditions of this grant”. Given that the APR includes a number of new questions, it is simply unrealistic to assume grantees would be able to reconstruct prior academic year data without having the necessary data infrastructure in place. As such, NCCEP strongly recommends that ED provide grantees with guidance on which questions may be required in 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 #28, p. 26: Total number of GEAR UP participants served during the reporting period by another federally funded program.
  - This question was optional in prior years and the data sharing agreements between GEAR UP and TRIO programs are unlikely to be in place for 2024.
- Question #37, p. 24: Academic Engagement.
  - This question is new, so data on the academic engagement of students during the prior academic year does not exist. Grantees will need to amend their data sharing agreements to report in 2025 or 2026, as well as future years.
- Question #39, pp. 33-34: High School Graduation.
  - While high school graduation has been reported on the FPR, it is new to the APR. Grantees will need to amend their data sharing agreements to report in 2025 and 2026, as well as future years.

By ensuring that the aforementioned questions are optional in 2024 and 2025, grantees will have sufficient runway to revise their data collection procedures and data sharing agreements to ensure accurate reporting.

- **Add an unduplicated student count to question #36, p. 24: Algebra I.**

In order to better align the reporting requirements of the APR and FPR (ICR Reference No: 202307-1840-002), NCCEP recommends revising question #36 to mirror the format of the proposed FPR. This adjustment would allow respondents to share the total unduplicated count of 9<sup>th</sup> grade students during the reporting period.

The revised question would then appear as follows:

Please complete the following table indicating the number of GEAR UP students who enrolled in and/or completed Algebra I or its equivalent by the end of the 9<sup>th</sup> grade (this includes students who enrolled in and/or completed prior to 9<sup>th</sup> grade.)

36. Did your grant project serve 9th grade students during the reporting period?

- Yes
- No

If yes, please fill out the table below.

Status	Number
(a) Number of 9 <sup>th</sup> grade students served by GEAR UP during the reporting period.	
(b) Number of students from Row (a) for which enrollment/completion data are not available.	
(c) Number of students from Row (a) who enrolled in Algebra I or its equivalent by the end of the 9 <sup>th</sup> grade. (Includes 9 <sup>th</sup> grade students who enrolled in Algebra I in grades 6-8).	
(d) Number of students from Row (c) who completed Algebra I or its equivalent by the end of 9 <sup>th</sup> grade. (Includes 9 <sup>th</sup> grade students who completed Algebra I in grades 6-8).	

- **Add an unduplicated student count to question #37, p. 24: Academic Engagement.**  
In order to better align the reporting requirements of the APR and FPR (ICR Reference No: 202307-1840-002), NCCEP recommends revising question #37 to mirror the format of the proposed FPR by adding a column (a) that requires grantees to report the “Total # of Unduplicated GEAR UP students.” The current columns, then, would be renumbered as (b), (c), and (d) respectively.

The revised question would then appear as follows:

37. Academic Engagement among GEAR UP Students. Complete the table below indicating academic engagement of 6<sup>th</sup> through 10<sup>th</sup> grade GEAR UP students throughout the reporting period. Academic Engagement is defined as students who have not failed a term of their core English/Language Arts (ELA) or mathematics courses.

**Step Two:** Complete the table below indicating academic engagement of GEAR UP students during the final year of the grant (Year 6 or 7). Academic Engagement is defined as students who have not failed a term of their core English/Language Arts (ELA) or mathematics courses.

Instructions for completing the table:

- In column (a), record the total number of unduplicated GEAR UP students enrolled in the grade level.
- In column (b), record the number of unduplicated GEAR UP students for which ELA or Math grades are not available to report.
- In column (c), record the number of unduplicated GEAR UP students with enrollment in at least one term of a core ELA or math by grade level during the reporting period.
- In column (d) record the number of unduplicated GEAR UP students from column (b) who did not fail a term of their core ELA or math courses during the

reporting period by grade level.

*Note: "Term" refers to annual, semester, trimester, quarter, or other primary marking period used by the Local Education Agency.*

Grade Level of Students for Reporting Period	(a) Total # of unduplicated GEAR UP students	(b) # of unduplicated students for which ELA and Math grades are not available	(c) # of unduplicated students with enrollment in core ELA or Math for the reporting period	(d) # of unduplicated students with no failures in core ELA or Math for the reporting period
6				
7				
8				
9				
10				
Total				

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

NCCEP appreciates ED's comments related this issue. Even if previous intentions were to have consistency between the paper version of the APR 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 reiterates the recommendation that the paper version of the APR include, as part of the instructions, clear explanations as to how the automated functions of the on-line APR operate and ensure that the paper-based version be regularly updated to always mirror the on-line portal including any word counts. Further, we recommend that the on-line version of the APR always allow respondents to overwrite any pre-populated data.

On behalf of the GEAR UP community, we would like to thank ED and OMB in advance for their careful consideration of our recommendations. We appreciate ED's efforts to streamline and improve the APR and we hope that the recommendations provided here will help further the effort as well as better align the APR with the FPR.

Sincerely,



Alex Chough  
President  
National Council for Community and Education Partnerships