



National Council for Community and Education Partnerships
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May 14, 2025

Ross Santy
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, GEAR UP Application Packages for Partnership and State Grants (OMB Control No. 1840-0821; ICR Reference No: 202501-1840-001; Agency Tracking No: ED-2025-SCC-0009)

Dear Mr. Santy:

On behalf of the National Council for Community and Education Partnerships (NCCEP), the national not-for-profit 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 in docket number ED-2025-SCC-0009.

In considering our comments, we recognize that the GEAR UP applications play a vital role in the design, selection, and implementation of GEAR UP programs. While the legislation and regulations provide important context for applicants, the deliberate choices made by the U.S. Department of Education (ED) pertaining to what is requested of applicants has a profound impact on framing the goals of the program, facilitating or inhibiting innovation, and also, the burden associated with planning, responding to, and submitting an application.

We examined the GEAR UP proposed applications through three distinct lenses:

- 1) To what extent do the applications facilitate an effective peer-review competition, while minimizing an applicant's burden to the greatest extent possible?
- 2) To what extent do the applications effectively align applicants to the legislative purpose, goals, and objectives of the GEAR UP program?
- 3) To what extent do the applications facilitate or inhibit the establishment of a coherent, research-based, and effective program design for post-award implementation?

Recognizing that ED seeks to swiftly approve the application, this public comment submission will be comprised of two sections. First, we will address relatively simple recommendations that should be adopted prior to finalizing the application packages. Second, we will provide some forward-looking commentary to help inform future GEAR UP notices inviting applications (NIAs).

NCCEP Recommendations for GEAR UP Application Packages

For each area addressed by this submission, we will provide a summary of the topic and page number followed by our pertinent comments. Given that some topics are referenced in multiple areas of the proposed application, we will focus on where the proposed text is most prominent.

- *Project Abstract, PP. 6-7, 70, and 76 in the State Application and PP. 8, 66, and 71 in the Partnership Application.* Given that the abstract is the only information from the application that is made available to the public, ensuring that the information communicated is sufficiently detailed is critically important. Too often the abstracts are generic or repeat performance measures without expressing sufficient insight into the grantee's program. We recommend that the application packages include the following instructions to capture more useful information in the project abstracts that benefit the public:

“The project abstract is limited to one page, single spaced. The abstract should include: The applicant name (including branch campus information), city, and state; key performance targets related to the project's goals and objectives; the unduplicated number of students both in year one, and in total over the life of the grant award period to be served; the specific number of target middle and high schools school(s); the NCES ID number for each participating school; a list of primary partners; and a summary of the core project activities and services that will be implemented during the six- or seven-year performance period; and the implementation model (cohort, public housing, priority, cohort and priority combined).”

Given that all the information included in our recommendation exists in an applicant's submission, this would substantially improve the quality of information being communicated to the public without increasing the applicant burden associated with the information collection.

- *Performance Measures, PP. 64-65 in the State Application and PP. 64-65 in the Partnership Application.* The application packages under review include GEAR UP performance/program measures that are no longer required by GEAR UP (daily attendance, grade promotion, aspirations/expectations) and are in conflict with the measures expressed in the NIA. Until corrected in the application package, this will continue to cause widespread confusion for applicants. We suggest updating the section that begins “your performance measures should include the following,” by utilizing the performance measures stated in the NIA. This change will not increase the applicant burden associated with the information collection.

Recognizing that the competitive preference priorities (CPP) and selection criteria are established in the NIA and generally cleared through a separate process, we do feel compelled to address important issues that should be addressed in future NIAs and GEAR UP competitions.

- *Group Application, P. 33 in the Partnership NIA.* The group application requirement from the Partnership NIA introduces a significant burden and cost to applicants that is not sufficiently addressed in ED's "Estimated Annual Burden and Respondent Costs Table" from Supporting Statement Part A. Requiring that Partnership applicants develop an application that "binds each member of the group to every statement and assurance made by the applicant in the application," is deeply problematic and time consuming during the application process. Given that applicants generally only have 60 days to submit their application, a thorough legal review by each and every partner on "every statement" of the application is unreasonable.

In addition, the commitments from the partners are already clearly detailed and authorized in the Partner Identification Form and Cost Share Worksheet, so the group application is redundant. It is our understanding that the intent of the group application is to ensure that the fiscal agent of the Partnership grant is not outsourcing key administrative and compliance functions to third parties. If that is indeed the rationale, we recommend having the fiscal agent attest that they will not be outsourcing the administration of their Partnership grant by simply amending Question #2 in the Partnership Project Profile Sheet to read:

"c. Will the fiscal agent of the Partnership retain full and direct administrative responsibility for the financial, compliance, and operational oversight of the project?

 Yes No "

This simple change will significantly reduce the applicant burden associated with the information collection and reduce redundancy.

- *Reliance on What Works Clearinghouse studies.* We support ED's emphasis on encouraging GEAR UP applicants to base their program design on rigorous research, however we have broad concerns about the feasibility of relying on the What Works Clearinghouse (WWC) as a foundation for key aspects of GEAR UP competitions. Given structural changes to the Institute for Education Sciences, we worry that this may impede the practicality of having a CPP or other selection criterion based on studies that are included in the WWC. We urge ED to consider alternative approaches for applicants to integrate rigorous research into their program designs.

On behalf of the GEAR UP community, we would like to thank ED and the OMB in advance for their careful consideration of our recommendations. We appreciate ED's efforts to streamline and improve the GEAR UP application process and we hope that the recommendations

provided here will help further that effort. We will be reaching out to ED leadership shortly to discuss these recommendations, and I invite you to contact me anytime if you have any questions about our submission.

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