

From: Linda Thompson [lthompson@harding.edu]
Sent: Wednesday, August 06, 2008 10:30 AM
To: FN-OMB-OIRA-Submission
Cc: Linda Thompson
Subject: Format Guidelines for SSS Proposals

To Whom It May Concern:

I understand that double-spacing tables has been proposed for the upcoming TRIO Student Support Services grant application. As a former reader of TRIO proposals, I would find double-spaced tables cumbersome to read. It also flies in the face of virtually all of the established writing guides (APA, MLA, etc.)--probably because it IS cumbersome to read and is likely to split tables between pages and/or move the entire table to another page, thus leaving large blank spaces on pages without tables.

I urge you not to make this decision. It will be difficult enough to get the complicated SSS proposals written in 50 (or even 65, if this is allowed) pages without the additional complication of having to double-space figures and tables.

I also support a page limit of 65 pages, as opposed to 50, given the large and complex nature of these programs.

Thank you for considering this comment.

Sincerely,
Linda Thompson

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Linda R. Thompson, Ed.D.
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From: Fortier, Priscilla J [pfortier@illinois.edu]
Sent: Wednesday, August 06, 2008 10:50 AM
To: FN-OMB-OIRA-Submission
Subject: comments

My comments on the changes to the SSS regs:

A 65 page limit is good: we need to be able to explain the institutional need for the grant as well as to lay out the Plan of Operation appropriately.

Regarding double spacing of tables: A terrible idea! They would be much more difficult to read. What could be the rationale for this?

Priscilla Fortier, Ph.D.
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From: Debbie Hollier [dhollier@lsu.edu]
Sent: Wednesday, August 06, 2008 10:58 AM
To: FN-OMB-OIRA-Submission
Subject: Comment: [OMB No. 1840-0117, [Student Support Services Grant
Applicatio].

Office of Information and Regulatory Affairs
Attention: Education Desk Officer
Office of Management and Budget
725 17th Street, NW.
Room 10222
Washington, D.C. 20503
oira_submission@omb.eop.gov

Comment #1: Doubled spaced charts will potentially crossover pages and be extremely difficult to read. This will frustrate the readers and create numerous problems for the proposal writers. I suggest that charts be single spaced in accordance with most style convention guide manuals (e.g. MLA, APA and Chicago/Turabian).

Comment #2: The grant page limit of 65 pages for the Student Support Services application is appropriate given the complexity of programming for low-income and first-generation students to graduate in good academic standing.

Comment #3: Given the stated Graduation Rate objective (____% of new participants served each year will graduate within six(6) years), it will be impossible to compare programmatic success at the institutional level or to compare success at SSS programs across the country. I suggest a revised Graduation Rate Objective that will examine the success of a specific group i.e.(____% of new freshman participants served each year will graduate within six(6) years), or for programs that accept large numbers of transfer students from 2 year institutions (____% of new transfer participants served each year will graduate within four(4) years).

Thank you for your attention to these issues.

Deborah Hollier
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From: maldarondojeffries@gmail.com on behalf of Michael Aldarondo-Jeffries [maldaron@mail.ucf.edu]
Sent: Wednesday, August 06, 2008 2:02 PM
To: FN-OMB-OIRA-Submission
Subject: Comments on upcoming Student Support Services Grant Competition

Good afternoon:

I hope this email finds you well. I am writing to comment that the Student Support Services grant page limit of 65 pages is appropriate for the upcoming grant competition. I also would like to support having charts be single spaced in accordance with most style convention guide manuals (e.g. MLA, APA and Chicago/Turabian).

Thank you for your consideration of this request.

Sincerely,

Michael

Michael Aldarondo-Jeffries
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From: Jeffrey M. Gladstone Brownfield [ue_jgladston@suagm.edu]
Sent: Wednesday, August 06, 2008 3:23 PM
To: FN-OMB-OIRA-Submission
Subject: 1840-0117

OMB Officials,

This is the second time that I am submitting the following two comments for your consideration because I just received the code number to properly identify them. The text is exactly the same as what I submitted the first time.

Sec. 646.7 What definitions apply?

(c) Other definitions. The following definitions also apply to this part:

Limited English proficiency with reference to an individual, means a person whose native language is other than English and who has sufficient difficulty speaking, reading, writing, or understanding the English language to deny that individual the opportunity to learn successfully in classrooms in which English is the language of instruction.

I request the following addition.

Limited Spanish proficiency with reference to an individual studying in Puerto Rico, means a person whose native language is other than Spanish and who has sufficient difficulty speaking, reading, writing, or understanding the Spanish language to deny that individual the opportunity to learn successfully in classrooms in which Spanish is the language of instruction.

Sec. 646.21 What selection criteria does the Secretary use to evaluate an application?

(a) Need for the project (24 points). The Secretary evaluates the need for a Student Support

(3) (8 points) The differences between eligible Student Support Services students compared to an appropriate group, based on the following indicators:

(iii) Graduate and professional school enrollment rates (four-year colleges only).

I request that this requirement be eliminated.

For most institutions there is no valid or reliable way to obtain such data neither for all of their former students, a significant number of whom are classified as drop-outs as well as their graduates. Neither can we gather data on a statistically representative sample. Former students leave the institution either with or without degrees. Any number (we cannot know how many) may continue their educations at some other institutions. Contact continues with only a small group and that depends entirely on them. The institution, much less a Student Support Services project, has virtually no control over the process. There is no way to compel former to inform the institution of their achievements (or the lack of them) later in life.

I appreciate your affording interested parties this opportunity to participate in the process of preparing the final version of these regulations.

Sincerely,

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Jeffrey M. Gladstone
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From: Robert L. Carmouche [rlc1713@louisiana.edu]
Sent: Wednesday, August 06, 2008 3:31 PM
To: FN-OMB-OIRA-Submission
Subject: SSS DRAFT Application for Grants Released: Comments Due August 8, 2008

Comment: Student Support Services Grant Application: OMB 1875-0106
expiration 11/30/2004.

Office of Information and Regulatory Affairs

Attention: Education Desk Officer
Office of Management and Budget

I would like to ask you to consider allowing grant applicants to single space, rather than double space, text in charts, graphs and tables.

In previous years single spacing in charts, graphs and tables has worked well because information in the body of the document could be reiterated within a chart, graph or table, making for ease in reading and comprehension. Also, the previous page-length (2005) of the grant submission was 75 pages with single-spacing allowed. The current maximum page length is 65 pages without single spacing allowed. This change in the document's format limits the inclusion of pertinent information and data.

Please be advised that the above request is based on my conversation with several Student Support Services directors.

I thank you in advance for your consideration of this request.

Robert Carmouche
Trio Director
University of Louisiana at Lafayette
rlc1713@louisiana.edu

From: MARTINEZ, MARIA [martinezm@cnm.edu]
Sent: Wednesday, August 06, 2008 4:47 PM
To: FN-OMB-OIRA-Submission
Subject: ''Comment: OMB # 1840-0117

To the Office of Information and Regulatory Affairs,

Attention: Education Desk Officer,
Office of Management and Budget, 725
17th Street, NW., Room 10222,
Washington, DC 20503

I recommend that the Department not include the type of formatting suggested on the draft RFP. Double space titles and headings, and all text in charts, tables, graphs, footnotes, quotations, references, and captions is unusual and awkward.

Magda Martinez-Baca
Director
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The Problems Ahead of You are Never as Great as the Power Behind You--
Dr. Ben Lerner

From: Janet Craven [jcraven@wncc.net]
Sent: Wednesday, August 06, 2008 4:42 PM
To: FN-OMB-OIRA-Submission
Subject: Comment 1840-0117 Student Support Services Grant Application

Given the role and mission of community colleges to provide vocational/technical education along with general education/transfer, I believe students who complete diploma and certificate programs should be counted as completers within the SSS program guidelines.

Many of our students are location bound and need to complete a technical program quickly and do not have the luxury of spending four years completing a bachelor's degree. Many technical fields pay better and are in higher demand. For instance, we have many students who successfully complete a two year Licensed Practical Nursing curriculum, but since our college recently began offering an Associate Degree Registered Nurse (ADN) program, our state (Nebraska) Postsecondary Coordinating Commission will no longer allow our college to offer an Associate of Applied Science degree in the LPN program. The only degree option for the LPN program is a Diploma.

Thus, our SSS program cannot count our many LPN diploma completers as success stories. The same is true in some of our other technical areas, where only diplomas and certificates are offered.

Given that some programs are not available at our community college, some students complete one year of general education and prerequisites and then transfer on to another two year program or a two plus two program offered cooperatively with another two year college. For instance, we offer a surgical technician program in conjunction with another two year college in the state. We can serve the students for one whole year and give them the foundation for success through the TRIO SSS program, but cannot later count them as completers since our college is not the one awarding the degree.

Another instance is students who complete two years of a pre-radiology program at our college, then transfer in to another two-year program at our local hospital. Since they do not transfer to a four-year college, we cannot count them as four-year transfers nor as completers since they transfer without a degree from a two year to a two year instead of a four-year college program.

SSS programs at community colleges should be able to count transfers to other two year programs in our success and completion statistics.

SSS programs at community colleges should be able to count diploma and certificate completers in our success and completer statistics.

Thank you for your consideration,
Janet Craven

Assistant Director
TRIO Student Support Services
Western Nebraska Community College
Scottsbluff, Nebraska

From: Schneider, Barbara [schneib@lavc.edu]
Sent: Wednesday, August 06, 2008 5:05 PM
To: FN-OMB-OIRA-Submission
Subject: SSS Draft Guidelines

Attachments: disclaimer.txt

This e-mail concerns the Single Space versus Double Space issue with SSS proposals. We are writing our application for renewal of our institution's TRIO/SSS project. The SSS Draft Guidelines state we should double space everything, including all tables, charts and graphs. However, COE has informed its members that tables and charts could be single-spaced. Our preference would be to permit single-spacing in tables, charts, graphs and headings since the total page limits for the Project Narrative section have been reduced to 65 pages.

If this is not allowed, we want to make sure that any applications submitted with single-spaced charts and graphs will not be read, holding everyone to the same standard.

Barbara Schneider
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From: Garrett-Newton, Judy [jgarrett@socc.edu]
Sent: Wednesday, August 06, 2008 5:10 PM
To: FN-OMB-OIRA-Submission
Subject: Comment: OMB 1840-0117, Student Support Services

I'm concerned about the requirement that all tables and charts on our SSS grant applications will have to be double-spaced. A double-spaced chart/table will take up a great deal of space on a page. Many applicants may choose instead to present a lot of their data in narrative form - data that would be better displayed in table form - which would make it much less "reader friendly." If the instructions are clear about the type of information that can be included in a chart or table, there will be less chance for applicants to use them inappropriately (and perhaps those that do could have points deleted from their scores).

Judy Garrett-Newton, Project Assistant
Student Support Services
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From: Glotzer, Alan [aglotzer@keene.edu]
Sent: Wednesday, August 06, 2008 5:15 PM
To: FN-OMB-OIRA-Submission
Subject: Comment: 1840-0117

I request that in Student Support Services applications, single spaced tables, charts, graphs and headings be allowed. Information in chart or table form, such as Need Section data indicating number and percent of eligible students presents better if single spaced. Budgets are best presented in single spaced charts as well.

Alan Glotzer
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