

Analysis of Comments on the Talent Search Program (84.044A)
30-Day Federal Register Closing Date Notice

[**NOTE:** The following is a summary of the changes submitted to the Office of Management and Budget (OMB) on the comments received on the Talent Search program (TS) application. Substantive issues are discussed under the major headings to which they pertain. Comments that are legislatively mandated were not addressed.]

1. Definitions

Comment: Four commenters requested that the Secretary revise the second part of the proposed definition of “enrolled” which requires projects to report on a participant “who has begun taking classes.” The commenters asserted that this would place a burden on grantees to provide documentation of participants who actually attend classes on a college campus as part of the requirement of establishing postsecondary enrollment. The commenters suggested that this part of the definition be removed.

Discussion: The proposed definition of “enrolled” has been revised to address the commenters concerns.

Changes: We will use the definition in 34 CFR Part 668.2 of the Student Assistance General Provisions which defines “enrolled” as “The status of a student who has completed the registration requirements (except for the payment of tuition and fees) at the institution that he or she is attending.”

Comment: One commenter objected to the proposed definition of “college-ready” and suggested that the Secretary allow individual grantees to define college ready students based on their local admissions requirements and local state laws, rules and regulations.

Discussion: We believe that there must be a standard and consistent definition and approach as a measure in the formula for determining how many participants enrolled in college. A standardized measurement is necessary for the Department (of Education) to satisfy its reporting requirements with respect to GPRA and the PART evaluation. Allowing each grantee to use its own definition will not yield a consistent and standard measure for collecting and reporting outcomes.

Changes: None.

2. Objectives

Comment: One commenter suggested that the proposed mandatory objectives do not address the prior experience criteria in 34 CFR 643.22 of the TS regulations relating to the number of participants served and the number of participants who meet the two-thirds low-income first generation requirements.

Discussion: A successful grantees will be informed via the funding documents how many participants it is required to serve. The data needed to determine the outcomes of a project with respect to numbers served and the makeup of those served will be obtained from each grantee's annual performance report. Therefore, it is not necessary to impose this reporting burden on applicants.

Changes: None

Comment: Several commenters suggested that the Secretary include additional objectives that address retention and reentry rates of secondary school participants and reentry rates of postsecondary participants as these are addressed in the prior experience criteria of the program regulations. The commenters are concerned that grantees will be penalized and not receive prior experience points if these areas are not addressed.

Discussion: All TS program participants are classified as either "college-ready" or "not college-ready." Participants who are secondary or postsecondary drop-outs or stop-outs, are in fact being counted as either "college-ready" or "not college-ready" participants. Thus, those participants are being counted and measured. They represent small numbers and we do not find it necessary to count them as separate groups.

Changes. None.

Comment: Commenters were concerned that the proposed objectives target services to secondary students and may negatively impact projects that propose to serve middle school students.

Discussion: We believe that the proposed mandatory objectives reflect the overarching goal and success of the TS program as measured by the participants' success in secondary school promotion, secondary school graduation, and postsecondary education admissions. The majority of the participants served by the TS program are secondary school students. There are different goals for participants who are 12th graders as these are the only participants who are eligible to graduate from high school and enroll in postsecondary education programs. All other secondary school participants address the goal of retention in secondary school until they become eligible to graduate from secondary school. For the purposes of the TS program, middle school students are included in the definition of secondary school.

Changes. None.

Comment: One commenter requested clarification as to whether the achievement rates would be determined based on the grant's project period (which can be four or five years) or whether the achievement rates would be determined based on each budget period.

Discussion: We agree that the objectives should address outcomes based on yearly achievement measures for each 12-month budget period. TS grantees will be

required to submit an annual performance report that addresses each of the objectives.

Changes. We have revised the proposed mandatory objectives to reflect achievement “during each budget period.”

3. Plan of Operation {§643.21(c)}

Comment: Several commenters questioned why applicants must provide detailed “plan of operation” information for each proposed target school. The instructions were as follows: “For the fifth sub-criterion, applicants must provide information for each of the proposed target schools.”

Discussion: Our goal with this provision is to encourage applicants to focus on the number of target schools they propose to serve to make sure they will have sufficient resources to effectively and efficiently serve students at their proposed number of schools.

Changes. We have changed the instructions to read as follows: “For the fifth sub-criterion, applicants must provide information that addresses how the project will use its resources to ensure that students at all proposed target schools are served.”

4. Evaluation Plan {§643.21(g)}

Comment: Two commenters suggested that clarity is needed in regards to the “Instructions for the Evaluation Plan”. The commenters felt that the requirements are outside of the scope of the selection criteria and therefore would place an undue burden on projects. According to the commenters, projects would be required to conduct activities that are beyond the scope of the selection criteria such as “developing instruments” and providing effective strategies for replication in other setting. The commenters also stated that it was confusing and unclear if the hiring of an external evaluator is a requirement of the Department.

Discussion: We disagree with the commenters. The expanded discussion in the instructions does not impose additional criteria on applicants beyond the requirements set forth in the regulations. In fact, the discussion only provides applicants with suggestions on the elements we believe should be included in a comprehensive evaluation plan. The decision regarding whether the evaluation is conducted internally or externally is left to the grantee.

Changes: None.

5. Number of Target Schools

Comment: Two commenters also suggested that the Talent Search Program “Profile” form be amended to include spaces to list more than ten target schools. The commenters suggest that although additional pages can be added to the form, this would create a bias against an applicant proposing to serve more than ten schools.

The commenters suggested that the Secretary change the application to eliminate language requiring applicants to select the number of target schools “based upon the grantee’s ability to efficiently and effectively deliver services” as this statement is prejudicial, particularly to small target schools and projects that serve rural areas. One commenter also suggested that, if a project is located in a rural area or proposes to serve small schools or schools in rural areas, proposing to serve larger target schools in the “quest for efficiency,” could run the risk of not serving the neediest schools or students.

Discussion: We have not mandated a specific number of target schools, however, we have suggested that applicants select the number taking into consideration the resources that will be available to serve students at those schools. Nothing prohibits a grantee from using non-federal funds to serve more target schools if it wishes.

Changes. None.

6. Formatting Instructions

Comment: Several commenters suggested that the formatting of the proposal be changed to add clarity in regards to double spacing of the narrative, including titles, headings, footnotes, quotations, references, and captions and charts within the narrative. The commenters proposed that there be only one instruction regarding titles, headings, footnotes, quotations, references, and captions -- preferably that they are single-spaced.

Discussion: We agree with the commenters.

Changes: The formatting instructions will be changed to read as follows: “Double-space all text in the application narrative **except** titles, headings, footnotes, captions, quotations, references, and all text in charts, tables and graphs which may be single-spaced.”

7. Appendices

Comments: One commenter suggested that the Secretary allow a page limit on the size of the appendices of no more than ten pages and that the appendices not be included in the page limit for the narrative.

Discussion: The narrative section (Part III) of applications submitted under the TS program is limited to 75 pages. The page limit does not apply to Part I, the application for federal assistance face sheet (SF 424); the supplemental information form required by the Department of Education; Part II, the budget information summary form (ED Form 524); and Part IV, the assurances and certifications. The page limit also does not apply to a table of contents. If applicants include any attachments or appendices, these items will be counted as part of the narrative section for the purposes of the page limit requirements.

Changes. None.

8. Letters of Support/Commitment

Comments: One commenter suggested that the Secretary include information on the formatting requirements for letters of support and/or commitment to allow these documents to be single-spaced particularly since these letters will be counted as part of the 75 pages.

Discussion: Letters of support or commitment should not be included as part of an application submitted under the TS program. Applicants are instructed to describe or summarize this information as narrative in the application. The instructions also state that, if these letters are submitted as part of the application, they will count towards the 75-page limit.

Changes: None.

9. “Other Narrative Section” of the Application

Comments: One commenter requested clarification of the “Other Narrative Section Form” and its placement in the application.

Discussion: The Department requires applicants to use an Internet-based electronic system for submitting applications via the Grants.gov portal where applicants will be able to download the application instructions and the application package. The “project narrative attachment form” is where applicants will attach their responses to the selection criteria. The “other attachments form” is where applicants will attach the “Talent Search Program Profile” page.

Changes: We have included more discussion in the instructions in the application.