

July 8, 2024

Nemeka Mason-Clerc
U.S. Department of Education
400 Maryland Ave, SW
Room 5C127
Washington, DC 20202-4260

RE: Priorities, Requirements, and Definitions for the Postsecondary Student Success Grant Program
([Docket No.: ED-2024-OPE-0069](#))

EdTrust, an organization committed to advancing policies and practices that dismantle the racial and economic barriers embedded in the American education system, thanks the U.S. Department of Education (“the Department”) for the opportunity to comment on the Priorities, Requirements, and Definitions for the Postsecondary Student Success Grant Program.

EdTrust has advocated for Congress to fund evidence-based college retention and completion initiatives through the Postsecondary Student Success Grant program (“the Program”), and we have advised the Department to design and manage the Program in a way that will improve outcomes for students of color and students from low-income backgrounds.

Broadly speaking, our view is the Department should target limited resources in the Program to institutions of higher education that:

- a.) Serve large numbers and/or percentages of students of color and students from low-income backgrounds;
- b.) Have a clear need to improve graduation rates for these students, i.e., low overall persistence and completion rates and/or large disparities between groups of students;
- c.) Are less well-resourced than peer institutions, i.e., have greater financial need; and
- d.) Demonstrate strong ability and commitment to implement evidence-based strategies, and/or to implement and rigorously evaluate promising strategies, for increasing persistence and completion among target groups of students.

The most recent application and review process yielded at least one awardee that does not meet all of these tests: a well-resourced, highly selective, R1 university with 27% of students receiving Pell Grants, just 2% Black students, and overall graduation rates in the low 90s, including graduate rates for Black and Latino students in the upper 80s — approximately double the success rate with those groups than the national average — received north of \$3 million, or almost 7% of the total appropriation for the Program. This is a strong signal that the process for designing the notice inviting applications and/or the review process should be changed to ensure the Program funds target unique opportunities to boost success rates for high-need students.

We offer suggestions on priorities, requirements, and definitions, as well as selection criteria and the review process.

Priorities

We support the existing priorities. Regarding the first three priorities — early phase projects, mid-phase projects, and expansion projects — we recommend the Department:

- a.) Include all three priorities in all future competitions;
- b.) Permit applicants to write to one or more priorities;
- c.) Reserve a minimum percentage of funds, such as 25%, for priority 3 (expansion projects) to increase the chance the Program will lead to near-term increases in student success.

Regarding priority 4 — using data for continuous improvement — we recommend the Department include this as an absolute priority for all applicants for all future competitions. Using data for continuous improvement should be an expectation of all Program grantees across all priorities/phases. The type and purpose of data collections may differ; early phase projects may collect data to identify the most effective approach(es) among options for the purpose of building new evidence, whereas expansion projects may collect data about implementation to ensure fidelity regarding proven strategies. But all projects, and the Program overall, and therefore students, will benefit from the use of data for continuous learning and improvement, so this should not be optional.

We recommend adding, and including as an absolute priority in all competitions, a priority that addresses institutional need and student need to ensure the Program funds projects where they are needed most. Please consider this recommended language:

Priority – Projects at lower-resourced institutions serving a significant population of high-need students and with low completion rates or large completion disparities

Projects where the lead applicant is a public or non-profit private Title IV-participating institution of higher education that:

1. Is a lower-resourced institution, as defined by the HEA Title III/V institutional need test, without waiver allowance; and
2. Serves a significant population of students from low-income backgrounds, defined as at least 50 percent (or the eligibility threshold for the appropriate institutional sector available [here](#)) of degree-seeking enrolled students receiving need-based grant aid under Title IV of the HEA; and
3. Has lower-than-average completion rates compared to the average for institutions of the same sector (2-year or 4-year) and control (public or nonprofit private) in the state or nationally; or
4. Has larger-than-average completion rate disparities by race/ethnicity or Pell Grant status compared to the average for institutions of the same sector (2-year or 4-year) and control (public or nonprofit private) in the state or nationally.

We would recommend using three-year averages, using the most recently available data to calculate metrics for the above criteria for this priority.

An alternative approach would be to revise the proposed eligibility requirement instead of adding this priority. We offer a revision below and are open to either approach.

Requirements

We recommend revising the eligibility requirement to the following:

Eligible entities are:

1. Title III or V institutions or public 2-year institutions (i.e., community and technical colleges) that:
 - a. Meet the HEA Title III/V low-resourced institution test and the high-need students test without need for waiver of those provisions; and
 - b. Serves a significant population of students from low-income backgrounds, defined as at least 50 percent (or the eligibility threshold for the appropriate institutional sector available [here](#)) of degree-seeking enrolled students receiving need-based grant aid under Title IV of the HEA; and
 - c. Have lower-than-average completion rates compared to the average for institutions of the same sector (2-year or 4-year) and control (public or nonprofit private) in the state or nationally; or
 - d. Have larger-than-average completion rate disparities by race/ethnicity or Pell Grant status compared to the average for institutions of the same sector (2-year or 4-year) and control (public or nonprofit private) in the state or nationally.
2. Nonprofits in partnership with eligible Title III or V institutions or public community and technical colleges; or
3. States in partnership with eligible Title III or V institutions or public community and technical colleges; or
4. Systems of public institutions of higher education if the majority of project activities would take place at eligible Title III or V institutions or public community and technical colleges.

We would recommend using three-year averages using the most recently available data to calculate metrics for the above criteria for this requirement.

Selection criteria

The Department has wide discretion in determining which selection criteria to use for reviewing applications, how to distribute total points across the selection criteria, and how to train and support non-federal reviewers in applying selection criteria during their application reviews. If the Department uses an absolute priority or a requirement as suggested above to limit the review pool to high-need institutions serving high-need students with low completion rates or large completion rate disparities, the Department can focus the selection criteria on rewarding the applicants that make the strongest case that they will use these limited federal dollars to build evidence, boost completion, or both.

We recommend the Department include and assign high maximum scores for the following selection criteria:

Need for project

The magnitude or severity of the problem to be addressed by the proposed project. (§ 75.210 (a)(2)(i))

Applicants with lower graduation rates and/or larger disparities by race/ethnicity (especially those impacting Black, Native, and Latino students) or Pell Grant status should receive more points.

In terms of how reviewers evaluate this criterion, awarding more points for worse outcomes is not necessarily rewarding bad institutional behavior, it is targeting interventions to students who need them most. Other criteria will help determine which applicants have the capacity to make gains.

The extent to which the proposed project will provide services or otherwise address the needs of students at risk of educational failure. (§ 75.210 (a)(2)(iii))

Applicants with more compelling use of metrics and data to both identify which students are “at risk of educational failure” in terms of retention- and completion-related indicators, and to target relevant evidence-based interventions to those students, should receive more points. The guiding questions here are “How clearly did they define which students are at risk of educational failure regarding retention and completion?” and “How well aligned are the specific services to the specific students, or categories of students?”

The Department should recognize institutions with strong practices and evidence-based decision-making. Examples include institutions that use research, whether their own or other external sources, to assess the impact of their funding strategies in ensuring at-risk students are properly supported. Additionally, programs with a history of tracking student progress, or programs with early intervention strategies that tailor the advising experience, particularly for students of color or with low-income backgrounds, show an aim at improving outcomes using data and evaluation.

The extent to which the proposed project will focus on serving or otherwise addressing the needs of disadvantaged individuals. (§ 75.210 (a)(2)(iv))

This criterion is about ensuring the Program funds are spent on activities that serve the students who need them most. Applicants with the clearest plans for ensuring the students who will participate are the students with the greatest economic and academic disadvantage should receive more points. It’s not enough for a college to have an above average amount of low-income students; institutions need to have clear plans to ensure the project will target and benefit students from low-income backgrounds. For example, an applicant that plans to offer an opt-in service open to all students should receive fewer points than an applicant that plans to offer an opt-out service open only to students with Pell Grants or some other measure of academic or economic disadvantage.

The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project, including the nature and magnitude of those gaps or weaknesses. (§ 75.210 (a)(2)(v))

Reviewers should award more points to institutions that have been doing more with less. This should not be used to reward colleges with such substantial weaknesses in data infrastructure that they would have trouble achieving success in the project. If there are two equally capable applicants, the tiebreaker should go to the applicant that has had to develop its capability with fewer resources. The Department should not allocate as many points to this criterion as the others we suggest above.

Significance

The potential contribution of the proposed project to increased knowledge or understanding of educational problems, issues, or effective strategies. (§ 75.210 (b)(2)(iii))

The importance or magnitude of the results or outcomes likely to be attained by the proposed project. (§ 75.210 (b)(2)(xvi))

For example, projects implementing strategies found to have doubled graduation rates in similar populations should receive more points than projects implementing strategies associated with smaller improvements in outcomes.

Quality of the project design

The extent to which the design for implementing and evaluating the proposed project will result in information to guide possible replication of project activities or strategies, including information about the effectiveness of the approach or strategies employed by the project. (§ 75.210 (c)(2)(x))

The extent to which the proposed project is designed to build capacity and yield results that will extend beyond the period of Federal financial assistance. (§ 75.210 (c)(2)(xii))

The extent to which the design of the proposed project reflects up-to-date knowledge from research and effective practice. (§ 75.210 (c)(2)(xiii))

The extent to which the proposed project will establish linkages with other appropriate agencies and organizations providing services to the target population. (§ 75.210 (c)(2)(xvii))

The extent to which performance feedback and continuous improvement are integral to the design of the proposed project. (§ 75.210 (c)(2)(xxi))

The extent to which the proposed project is supported by promising evidence (as defined in [34 CFR 77.1\(c\)](#)). (§ 75.210 (c)(2)(xxviii))

The extent to which the proposed project represents a faithful adaptation of the evidence cited in support of the proposed project. (§ 75.210 (c)(2)(xxx))

Quality of project services

The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (§ 75.210 (d)(3)(iii))

The likely impact of the services to be provided by the proposed project on the intended recipients of those services. (§ 75.210 (d)(3)(iv))

Quality of the project evaluation

These criteria would be used for the relevant priority based on corresponding levels of evidence and evaluation.

The extent to which the methods of evaluation will, if well implemented, produce evidence about the project's effectiveness that would meet the What Works Clearinghouse standards without reservations as described in the What Works Clearinghouse Handbook (as defined in [34 CFR 77.1\(c\)](#)). (§ 75.210 (h)(2)(viii))

The extent to which the methods of evaluation will, if well implemented, produce evidence about the project's effectiveness that would meet the What Works Clearinghouse standards with or without reservations as described in the What Works Clearinghouse Handbook (as defined in [34 CFR 77.1\(c\)](#)). (§ 75.210 (h)(2)(ix))

The extent to which the methods of evaluation will, if well implemented, produce promising evidence (as defined in [34 CFR 77.1\(c\)](#)) about the project's effectiveness. (§ 75.210 (h)(2)(x))

We thank you for your consideration and for the opportunity to comment. Should you have any questions regarding the content of this comment, please contact Reid Setzer (rsetzer@edtrust.org) or Phil Martin (pmartin@edtrust.org).

Sincerely,

EdTrust