

The Honorable Nasser Paydar
Assistant Secretary for Postsecondary Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202



Re: Postsecondary Student Success Grant Proposed Rule

Docket ID: ED-2024-OPE-0069

June 28, 2024

The National College Attainment Network represents over 600 college access and success organizations across the country, committed to helping students, especially first generation college-goers and those from low-income families, attain a postsecondary degree. NCAN members, including non-profits, state agencies, and institutions of higher education (IHEs,) support approximately two million students to and through college each year. Many members in our network, including Bottom Line, One Goal, College Possible, and One Million Degrees, provide advising, academic tutoring, and mentorship services to students throughout high school graduation and into their postsecondary degree programs. As a result, NCAN members are deeply knowledgeable about the research needed to design effective college attainment programs and the capacity necessary to help students achieve postsecondary success.

We greatly appreciate the Department's emphasis on evidence-based, data-driven project implementation, and the need for rigorous program evaluation in the proposed rule for the Postsecondary Student Success Grant. We were particularly pleased to see the requirements for programs outlined in Proposed Priority 4 (Using Data for Continuous Improvement), which facilitate ongoing advancement of student outcomes and encourage institutional leadership to systematize student success programming in their agendas.

We recommend the following adjustments to the proposed priorities and requirements for Postsecondary Student Success Grant application and award process:

1. Proposed Priority 2 (Mid-Phase/Moderate Evidence) and Priority 3 (Expansion/Strong Evidence)

NCAN supports the use of a three-tier model and the prioritization of projects proven effective through rigorous evaluation. We suggest that programs with stronger evidence of success serving students should receive a plurality of grant awards, while early phase projects should use more limited funding to build out promising practices. We recommend that the Department revise the scaling guidelines listed in Proposed Priority 2 (multiple campuses or institutions, serving at least 2,000 students,) and Proposed Priority 3 (multiple institutions, serving at least 10,000 students,) and instead, examine the caliber of research that programs provide, with a focus on participant outcomes. Campus and population metrics are imprecise measures of program efficacy, and do not identify the impact of a program on student success. Awardees should be assessed based on presented evidence of the effectiveness of their models to improve student achievement and retention.

2. Proposed Requirement 2 (Indirect Cost Rate)

We are concerned that the Department's proposal to limit grantees' indirect cost reimbursement to eight percent of their modified total direct cost base will be financially restrictive, particularly for non-profit organizations. We encourage the Department remove the eight percent limit, and instead allow for negotiated indirect cost rates, as seen in other grant competitions from the Department.¹

3. Proposed Requirement 6 (Independent Evaluation)

While we commend the Department's decision to require independent project evaluation and to make these reports publicly available on ERIC, we suggest that the burden of submission fall to the Department, rather than to grantees. We recommend that within one month of completion, grantees should submit their evaluation reports to the Department, and the Department should then post the evaluations and project abstracts on ERIC. The shifting of submission responsibility will ensure a smoother and more timely process for building the evidence base about effective strategies for student success and supporting the timely implementation of these practices.

4. Proposed Requirement 7 (Eligible Entities)

We applaud the Department for recognizing non-profit organizations as entities eligible to receive Postsecondary Student Success Grants. NCAN members, many of whom fall into this category, are proven leaders in the field of college access and success. However, in the grant application for FY23, and in the proposed rule, the Department seems to suggest that non-profit organizations are only eligible when partnered with an institution of higher education (IHE) at the application stage. We strongly recommend that the Department return to language used in House Report 117-403, which clearly identifies non-profit organizations as standalone eligible entities, without the requirement of a formal partnership with an IHE: "Eligible applicants may include institutions of higher education, a consortium of institutions of higher education, statewide systems of higher education, a *nonprofit organization*, or any of the preceding entities in partnership with a non-profit or business."

Highly effective postsecondary success programs, including models from Bottom Line and One Goal, begin coaching students while they are still in high school (before they would have the opportunity to partner formally with an IHE,) and follow them into or through their postsecondary education. As such, these programs do not have formal partnerships with postsecondary institutions – they support students at many colleges and universities and provide ongoing guidance if students transfer. In order to ensure that high-impact, evidence-based programs remain eligible for Postsecondary Student Success Grants, it is critical that the Department allows non-profits to apply for awards on their own, as well as in partnership with IHEs.

¹U.S. Department of Education (May 6, 2024), "Applications for New Awards; Education Innovation and Research (EIR) Program Early-phase Grants," 89 FR 37185, at <https://www.federalregister.gov/documents/2024/05/06/2024-09797/applications-for-new-awards-education-innovation-and-research-eir-program-early-phase-grants#p-227>.

Secondly, in regard to the eligible entities requirement, we ask that the Department not limit eligibility to Title III and V institutions and those in partnership with Title III and V institutions. While NCAN appreciates the goal of closing equity gaps and providing resources to students underrepresented in higher education, there are large student populations at many institutions beyond those designated as Title III and V, who would benefit greatly from postsecondary success programming. We suggest that the Department prioritize grant awards based on the demographic information, including low-income and first-generation status, of students at an IHE, rather than the institution's Title III or Title V status. Removing the Title III and Title V requirement, and opening eligibility to greater number of postsecondary institutions, will only broaden the impact of the Postsecondary Student Success Grant program and assist more students in realizing degree attainment and economic mobility.

We thank you for your efforts to recognize high-quality, evidence-based, student success programs, working to improve postsecondary attainment and economic mobility for students across the country.