TRIO Concerns in the PROSPER Act

H.R. 4508, the Promoting Real Opportunity, Success and Prosperity through Education Reform (PROSPER) Act, proposes many reforms to the Federal TRIO Programs (TRIO). If enacted, several of the provisions below could endanger your constituents' ability to secure and/or retain TRIO program funding in the future. Therefore, we hope you will work with the leadership of the House Committee on Education and the Workforce to amend the proposals below through the pending reauthorization of the Higher Education Act.

1. **"[T]he Secretary shall reserve not less than 10 percent of…available amount[s] to award grants or contracts to applicants who have not previously received a grant or contract under this chapter."** (Page 153, Line 10 – Page 154, Line 3)[1]

WHY IS THIS A PROBLEM?

➤ This provision, in combination with the IMPACT Grants (discussed in greater detail below), **defers total authority with respect to TRIO to the Administration** and the desires of any Secretary of Education.

➤ **TRIO Programs are not one-time "demonstration programs."** TRIO, like Pell Grants, are Student Assistance Programs funded under Title IV of the Higher Education Act. They have a sustained federal role in providing access and support services to low-income, first-generation students.

➤ This set aside invalidates the points awarded to current grantees for prior success in achieving high quality delivery of services, thereby negating "accountability for outcomes." In doing so, **this provision undermines the principle of continuity in student services** and disrupts the development of expertise and institutional culture of college access and success.

➤ This provision appears to emerge from a misconception that new applicants are unable to secure TRIO funds. Yet, an analysis of the most recent TRIO grant competitions indicates that, in fact, **new applicants enjoy a high rate of success**. Over the last seven TRIO grant competitions, which were held between FY 2015 and FY 2017, on average 20% of grants were awarded to new applicants. (For detailed information about the grant competitions – including the number of applicants, number of awards, etc. – see the attached sheet.)

2. **"[The Secretary shall not limit an entity's eligibility to receive funds under this division because such entity sponsors a program similar to the program to be assisted under this division, regardless of the funding source of such program] as long as the program is the serving a different population or a different campus."** (Page 155, Lines 1-4)

WHY IS THIS A PROBLEM?

➤ **Limiting institutions' eligibility for TRIO funding based on whether they host similar programs discourages institutional efforts to have skin-in-the-game.** If enacted, this provision would penalize institutions for investing their own resources into college access and success services to support their own students and those in the surrounding communities.

➤ TRIO programs often form the building blocks upon which institutions build their own institutional efforts. If enacted, this provision would remove a critical model that informs college access and success practices.

---

[1] Page and line references reflect bill as initially introduced on December 1, 2017 and available at https://edworkforce.house.gov/uploadedfiles/bills-115hr4508ih.pdf.

3. **"…The Secretary shall not approve an application submitted…unless such application provides that the eligible entity will provide, from State, local, institutional, or private funds, not less than 20 percent of the cost of the program…."** (Page 157, Line 9 – Page 159, Line 8)

<u>WHY IS THIS A PROBLEM?</u>

➢ **Many entities that serve low-income, first-generation students and students with disabilities do not have the capacity to meet a matching requirement.** It is precisely for this reason that they rely on TRIO funding to meet the needs of the youth and adult learners that they serve. **This is particularly true of minority-serving institutions and community colleges**, which traditionally are under-resourced, yet serve students with the greatest need for intervention and supportive services; **and community-based, non-profit agencies**, which have small budgets, yet provide direct services to low-income students and families in their local communities.

4. **Increased Reporting Requirements for Talent Search and Educational Opportunity Centers**

   A. In Talent Search, "require an assurance that the remaining youths participating in the project…be low-income individuals, first-generation college students, or students who have a high risk for academic failure." (Page 168, Lines 1-5)

   B. In Educational Opportunity Centers, "require an assurance that the remaining persons participating in the project…be low-income individuals or first-generation college students." (Page 173, Lines 23- Page 174, Line 2)

<u>WHY IS THIS A PROBLEM?</u>

➢ Because both Talent Search and Educational Opportunity Centers (EOC) serve broad groups of participants (e.g., entire classrooms of students, presentations at workforce development centers, homeless shelters, etc.), it is typically not feasible for programs to secure adequate documentation to ensure that all participants meet the criteria in the law. By requiring documentation for all participants, **it may quell program outreach or encourage underreporting by programs**.

➢ This provision emerged from a concern that TRIO services might be made available to participants who do not meet the eligibility criteria. However, a review of the most recent performance data of the Talent Search and EOC programs released by the U.S. Department of Education reveals that these fears are unfounded. For instance, during the 2013-2014 program year, 94.4% of students in the Talent Search program were low-income, first-generation or both low-income and first-generation.[2] Similarly, the most recently published performance data of the EOC program indicated that 95.7% of program participants were low-income, first-generation or both low-income and first-generation.[3]

---

[2] U.S. Department of Education, Office of Postsecondary Education, Student Service, *Fast Facts Report for the Talent Search Program,* Washington, D.C., 2016.

[3] U.S. Department of Education, Office of Postsecondary Education, *A Report on the Educational Opportunity Centers Program: 2007–08, With Select Comparative Data, 2002–07*, Washington, D.C., 2009.

5. **Funding of Impact Grants from TRIO Appropriation:** **"From the amounts appropriated under 402A(g), the Secretary shall reserve not less than 10 percent of such funds to carry out this section."** (Page 180, Lines 22-24)

<u>WHY IS THIS A PROBLEM?</u>

➢ The TRIO community does not quibble with the creation of the IMPACT Grants. However, it does take strong opposition to the funding of this initiative out of the TRIO appropriation. As currently worded, the language would allow the Secretary to use the entire TRIO appropriation for such purposes. Even if only limited to a small percentage, **having a segment of TRIO funding set aside to fund IMPACT Grants would result in the loss of direct student services bound by accountability measures already set into place and prescribed by Congress**.

6. **Deletion of language ensuring future evaluations within TRIO refrain from causing undue harm to program participants and meet the need of institutional review boards.**

<u>WHY IS THIS A PROBLEM?</u>

➢ During the last reauthorization, the authorizers recognized that previous evaluations of TRIO – most notably Upward Bound – put programs and institutions in a position to engage in unethical evaluation practices. To prevent this from happening again, the Higher Education Opportunity Act (HEOA) included language stating that future evaluations would not require TRIO programs to "recruit additional students beyond those the program or project would normally recruit" nor engage in practices that "result[ ] in the denial of services for an eligible student under the program or project." (20 USC §402H(b)(3)) Additionally, in designing future evaluations, HEOA required that Secretary to consider "the burden placed on the program participants or the eligible entity" and "whether the evaluation meets generally accepted standards of institutional review boards." (20 USC §402H(b)(4)) The TRIO community strongly believes that **in order to preserve the integrity of future evaluations of TRIO, this language must be maintained** in future iterations of the Higher Education Act.

SUCCESS RATES OF NEW APPLICANTS IN RECENT TRIO GRANT COMPETITIONS

FY 2015 TRIO Grant Competition

Student Support Services
Total Number of Applicants: 1,487
Number of NEW Projects: 158 (15% of funded applicants)

FY 2016 TRIO Grant Competitions

Educational Opportunity Centers
Total Number of Applicants: 382
Number of NEW Projects: 32 (22% of funded applicants)

Talent Search
Total Number of Applicants: 890
Number of NEW Projects: 74 (16% of funded applicants)

FY 2017 TRIO Grant Competitions

Upward Bound
Total Number of Applicants: 1,222
Number of NEW Projects: 146 (15% of funded applicants)

Upward Bound Math Science
Total Number of Applicants: 638
Number of NEW Projects: 49 (26% of funded applicants)

Veterans Upward Bound
Total Number of Applicants: 208
Number of NEW Projects: 15 (26% of funded applicants)

McNair
Total Number of Applicants: 309
Number of NEW Projects: 35 (19% of funded applicants)