

**To:** Institutions Hosting Federal TRIO Programs

**From:** Maureen Hoyler, President  
Council for Opportunity in Education

**Date:** December 11, 2017

**Re:** TRIO in the PROSPER Act

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H.R. 4508, the Promoting Real Opportunity, Success and Prosperity through Education Reform (PROSPER) Act, proposes many challenging reforms to Title IV of the Higher Education Act. Through this memorandum, I hope to draw your attention to specific provisions related to the Federal TRIO Programs (“TRIO”) that could endanger your institution’s ability to secure and/or retain such funding.

**“[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 13)

WHY IS THIS A PROBLEM?

- This provision, in combination with the IMPACT Grants (Page 192, Lines 9-11, 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.)

**“[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?

- The provision limits institutions' eligibility for TRIO funding based on whether they host similar programs and 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.

**“...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)

#### WHY IS THIS A PROBLEM?

- As written, this provision does not distinguish between TRIO programs that serve its own students (i.e., college-based programs serving its own undergraduates) versus those serving youth and adults in the local community (i.e., college- and community-based programs serving pre-college youth and adult learners). Understandably, different types of TRIO grantees may have different interests in serving each respective population.
- 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.

**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)

#### WHY IS THIS A PROBLEM?

- 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. Ultimately, like the set-aside contemplated for new TRIO grantees, this provision invalidates the points awarded to current grantees for prior success and would limit opportunities institutions to receive TRIO funding to serve low-income, first-generation students enrolled at their institutions and/or in their local communities.

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

WHY IS THIS A PROBLEM?

- 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. In fact, the institutional review boards of many TRIO host colleges and universities cited the evaluation as one that would not be deemed acceptable for human subjects if implemented by their own faculty or students. In order to prevent a similar type of study from being implemented in the future, 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)