

March 12, 2025

Dear TRIO Colleagues:

In these uncertain times, we know that many TRIO professionals are eager to take proactive steps to ensure our students and programs are well protected. In addition to continuing to [engage with your Members of Congress](#), COE encourages you to review your TRIO grant for compliance and to assess whether your operations might need adjustments to address evolving risks. Below are steps to help support your program in that regard and important considerations to make during these challenging times.

Compliance Review Process

Review all applicable documents related to the TRIO grant. This includes all applicable statutes, regulations, policies, procedures, programmatic services, training materials, handbooks, etc., to ensure that they align with compliance requirements. Be sure to clearly document and date this review process. If you find that your program is out of compliance, we recommend the steps below:

1. **Assess whether the changes needed qualify as a change in scope.**
 - a. **If yes**, request permission from the Department of Education (ED) or the Program Specialist to make the necessary changes in accordance with OMB 200.308(f)(1). (*Note: COE believes that this situation would be very rare.*)
 - b. **If no**, proceed with developing corrective actions.
2. **Create a corrective action plan** that details deliverables and applicable dates.
3. **Document the process thoroughly**, including the date the corrective action was discussed with your supervisor and minutes from the staff meeting where the corrective action was discussed or implemented.
4. **Implement the corrective action** and keep detailed records of the changes and the ongoing process.

Considerations for Adjusting Operations

Beyond ensuring compliance with current policies and regulations governing TRIO grants, we recommend that grants recipients proactively evaluate whether to adjust their operations based on a broader range of risks beyond only the implications of the presidential Executive Orders:

- Consider ED's recent guidance, including the February 28 [Frequently Asked Questions](#) document in response to the February 14 Dear Colleague Letter.
- Evaluate the possibility of potential executive action to examine or cancel individual grants, particularly if similar [SFFA-type reasoning](#) is used (e.g., race-based considerations in program admission).
- Take into account ED's evolving record of enforcement actions against institutions.

Each recipient must decide whether to adjust its policies based on its specific grant and its appetite for risk. If your grant receives any unusual request or non-standard notice from the Department of Education, please contact:

- Angelica Vialpando, Senior Vice President of Program and Professional Development: angelica.vialpando@coenet.org
- Jennifer Rudolph, Associate Vice President of Pre-College and State Initiatives: jennifer.rudolph@coenet.org
- Woodrow Lewis, Director of College Initiatives: woodrow.lewis@coenet.org

COE is dedicated to supporting our membership and assisting all TRIO programs in fulfilling their mission: to serve low-income, first-generation students, and students with disabilities. To continue providing service to our participants, maintaining our funding and ensuring compliance remain our top priorities.