



July 5th, 2024

U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Docket ID: ED-2024-OPE-0069

To Whom It May Concern:

Thank you for the opportunity to provide comments on the Department of Education's proposed priorities, requirements, and definitions for use in the Postsecondary Student Success Grant (PSSG) program. The New America higher education program is a team of researchers, storytellers, and advocates from diverse backgrounds who are focused on developing student-centered federal policy recommendations. We are dedicated to making higher education more equitable and accountable, fighting for inclusion rather than exclusivity, a college financing structure that promotes opportunity, a higher education ecosystem where all players are held accountable, and a transparent system where families and taxpayers understand outcomes. Our goal is to ensure that all students have the opportunity to obtain an affordable, high-quality education after high school.

We write today to reiterate our support for the PSSG program and to provide our recommendations to strengthen the competition, making sure the program achieves its purpose of equitably improving students outcomes through the implementation and expansion of evidence-based practices. We believe that the focus on data, implementing and evaluating evidence-based activities is critical, and is a step in the right direction to move the needle on college completion. At the same time, the Department should make sure the PSSG competition can uplift, not disadvantage, colleges and universities that serve a significant number of underserved students but lack the resources and experience in implementing evidence-based practices.

In this letter, we would like to address the following aspects of the proposal:

1. The required participant size for mid-phase and expansion phase grants
2. Proposed priority 5: Projects that support college-to-career pathways and supports
3. Proposed requirement 6: Independent evaluation

Our detailed comments are below. Should you have any questions regarding these comments, we welcome the opportunity to discuss further. Thanks for your time and consideration.

Sincerely,



Sophie Nguyen
Senior Policy Analyst
New America Higher Education Program
nguyens@newamerica.org



Comments from New America

The required participant size for mid-phase and expansion phase grants

In the proposed priorities for mid-phase and expansion phase projects that are respectively supported by moderate and strong evidence, the language requires that the projects under these priorities serve at least 2,000 students (mid-phase grants) and 10,000 students (expansion grants). While we understand the intention to ensure access to high-quality, evidence-based practices for a large number of students, we are concerned about the proposed size of participants for the following reasons:

First, a majority of Title III and Title V-eligible institutions, the core recipients of PSSG, are small and medium-sized, meaning that their total enrollment is less than 10,000 students. Looking at institutions that are eligible for Title III and Title V in 2024, 46 percent enroll between 1,000 and 5,000 students, nearly 30 percent enroll less than 1,000 students, while only 11 percent enroll more than 10,000 students (see Table 1). Even if an institution enrolls more than 10,000 students, it can be challenging to meet the Department's proposed size of participants, since grants' activities typically only target a certain population of students (e.g. students close to completion, or first-year students) rather than all students on campus. Therefore, without more stipulation on how small and medium-sized institutions can satisfy the proposed number of participants, the Department might discourage small and medium-sized campuses, which is a majority of PSSG eligible institutions, from implementing mid-phase and expansion phase projects.

Institution Sizes	Percentage (%)
Under 1,000	28
1,000-4,900	46
5,000-9,999	15
10,000-19,999	8
20,000 and above	3

Note: Author's analysis using data from the Integrated Postsecondary Data System (IPEDS) and Title III and Title V Eligibility Matrix 2024.

Sources: U.S. Department of Education, National Center for Education Statistics, *Integrated Postsecondary Education Data System (IPEDS)*, <https://nces.ed.gov/ipeds>; U.S. Department of Education, "Eligibility Designations and Applications for Waiver of Eligibility Requirements," <https://www2.ed.gov/about/offices/list/ope/itudes/eligibility.html>.

Second, a large number of participants means the grant funding might be stretched too thin, especially when strategies with moderate and strong evidence that are considered the most



effective in improving student outcomes are expensive to implement. The City University of New York's (CUNY) Accelerated Study in Associate Program (ASAP), a comprehensive college success model with strong evidence, costs \$3,400 per student annually.¹ Bottom Line, an advising model also with strong evidence, costs \$6,000 per student over five to six years, which equals roughly \$1,000 annually.² In fiscal year (FY) 2023, the PSSG competition awarded \$8 million max for mid-phase and expansion projects over four years. If FY2023's grantees are to meet PSSG's proposed number of participants for projects with strong evidence, they will need to work with \$2 million for at least 2,500 students per year (assuming the number of participants are spread equally throughout the grant period), which means \$800 per student. Grantees will not be able to implement programs such as ASAP or Bottom Line without finding substantial funding from other sources.

And lastly, while another purpose of PSSG is to "rigorously evaluate evidence-based activities," such large requirements for numbers of participants are not needed for rigorous evaluation, as long as the study is well-designed and well-executed. The What Works Clearinghouse (WWC), the Institute of Education Sciences' initiative that reviews and evaluates rigorous studies about what works in education and disseminates them to the public, does not require evaluation studies to have a minimum sample size to be eligible for review.³ Having said that, in order to assess whether the project yields moderate or strong evidence, WWC requires evaluation studies to have a sample size of at least 350 participants, which is much smaller than the number of participants proposed by the Department.⁴

We believe that expanding access to high-quality, evidence-based practices to more students and building up evidence for effective practices are key to the success of PSSG; however, the rules should not risk creating barriers for smaller institutions to implement practices with strong evidence. We believe lowering the required number of participants will not undercut the impact of the program, and at the same time, encourage more institutions to try for practices with strongest evidence in improving student outcomes like ASAP. Therefore, we recommend that the Department only require mid-phase and expansion phase projects to meet the WWC's minimum sample size required for moderate and strong evidence tier, i.e. 350 participants.

Proposed priority 5: Projects that support college-to-career pathways and supports

Proposed priority 5 highlights projects that propose to integrate "career-connected learning and advising support into their postsecondary success strategies to ensure students earn credentials of value that lead to economic success and/or further education that leads to career progression." At New America, we are staunch advocates for ensuring educational programs

¹ CUNY ASAP | ACE, "Fast Facts," April 2024,

https://www.cuny.edu/wp-content/uploads/sites/4/page-assets/about/administration/offices/student-success-initiatives/asap/evaluation/CUNY-ASAP-and-ACE-Fast-Facts_April-2024_WebFinal.pdf.

² Institute of Education Sciences, *Bottom Line* (Washington DC: Institute of Education Sciences, April 2021), https://ies.ed.gov/ncee/WWC/Docs/InterventionReports/WWC_IR_Bottom-Line_BRIEF_508.pdf.

³ Institute of Education Sciences, *What Works Clearinghouse: Procedures and Standards Handbook, Version 5.0*, (Washington DC: Institute of Education Sciences, December 2022), p. 24, https://ies.ed.gov/ncee/WWC/Docs/referenceresources/Final_WWC-HandbookVer5_0-0-508.pdf

⁴ Institute of Education Sciences, *What Works Clearinghouse*, p. 132.

provide students with credentials that lead to good jobs and financial well-being. However, PSSG is a grant program with a focus on using data-driven, evidence-based practices to improve student outcomes. Priorities, therefore, should be determined by the level of evidence of the strategies, as shown in proposed priorities 1-3, rather than the focus of the strategies.

Furthermore, the Department already listed career-relevant support as one of the allowable activities under the required uses of funds. Providing extra priority to career-focused strategies can skew the purpose of the program, weaken the retention and completion focuses, and lengthen the time horizon for evaluation since career outcome data can take time to collect. We recommend that the Department only make priority 5 an invitational priority. As long as the proposed strategies are backed up by data and evidence, applicants should not be disadvantaged if they choose to only focus on retention, transfer, and completion practices.

Proposed requirement 6: Independent evaluation

One of the proposed requirements states that all grantees must conduct independent evaluation of their projects. The evaluation report will then be reviewed by the WWC, helping the Department meet the goals of “building the evidence base about what works to improve retention, upward transfer, and completions of value that lead to economic success and/or further education.” This is a key requirement of the program, ensuring the understanding of PSSG’s impacts on college retention and completion. Since the evaluation study will need to be reviewed by the WWC, it is important that the study meet the WWC’s criteria for study eligibility requirements.⁵

The WWC requires that the evaluation report satisfy all criteria in format, research design, studied populations, interventions, and studied outcomes. By default, evaluation reports conducted for PSSG projects will satisfy many of the WWC’s eligibility criteria, since they study the impact of student success practices (which are considered eligible interventions) on college students’ (eligible populations) multiple outcomes such as academic progress, retention, and completion (eligible outcomes). The Department requires all reports to be submitted to ERIC in a timely manner, fulfilling the criteria about availability and timeframe. Having said that, while the proposed requirement states that the evaluation needs to be rigorous, it does not specify what research design the evaluation report must conduct. The WWC only reviews studies that use one of the following research designs: randomized controlled trial (RCT), quasi-experimental design (QED), regression discontinuity design (RDD), and single-case design (SCD).

It is imperative that the Department clarify what it means by rigorous evaluation and specify the four research designs approved by the WWC to prevent subpar evaluation studies. To make sure evaluation reports are eligible for review by the WWC, we recommend that the Department take a step further and require that evaluation reports meet WWC’s eligibility requirements as listed in its Procedures and Standards Handbook, Version 5.0, or its most updated version.

⁵ Institute of Education Sciences, *What Works Clearinghouse*, p. 22-25.

