Dr. Nasser H. Paydar  
Assistant Secretary for Postsecondary Education 
U.S. Department of Education 
400 Maryland Avenue SW 
Washington, DC 20202 

Via electronic submission at regulations.gov 

Re: Comments on Priorities, Requirements, and Definitions for the Postsecondary Student Success Grant Program, Docket ID ED-2024-OPE-0069 

Dear Dr. Paydar,

The Institute for College Access & Success (TICAS) seeks to comment on the recent request for input on the proposed priorities, requirements, and definitions for use in the Postsecondary Student Success Grant (PSSG) program. TICAS is a nonprofit, nonpartisan research and advocacy organization working to advance affordability, accountability, and equity in higher education. Our recommendations reflect our goal to improve postsecondary outcomes for all students – especially Black, Latino, Indigenous, and underrepresented Asian American and Pacific Islander (AAPI) students, as well as students from low-income backgrounds. Specifically, we provide responses to aspects of the proposed priorities, requirements and definitions.

The Postsecondary Student Success Grant (PSSG) program should play a crucial role in boosting college completion rates by supporting initiatives that equitably enhance student outcomes. Increases in college attainment leads to a more educated workforce, greater economic mobility, and reduced income disparities. TICAS is excited to see the U.S. Department of Education (the Department) propose priorities to fund programs that have demonstrated completion success with data and rigorous research and evaluation methods, while also creating opportunities for under-resourced institutions to equitably implement emerging practices that show promise to improve completion for students of color and from low-income backgrounds.
Below, we discuss additional considerations for identified priorities, requirements and definitions that we believe could strengthen the program even further. Based on our analyses, we propose that the Department:

- **Proposed definition "Completions of Value":** Allow local economic data to be the driver of this metric, if definition is implemented.
- **Priority 3 - Expansion Phase:** Put in place processes to expedite the review of eligible studies that PSSG applicants can use that overlap and reflect their student populations and institution types and provide clear guidance on how to submit a relevant study for review to determine if a study meets WWC standards.
- **Priority 4- Using Data for Continuous Improvement:** Clearly define and articulate baseline metrics to reflect outcomes of students of color, Pell-eligible, rural-located, first-gen, and other intersecting identities, as well as allow institutions to use funds for institutional research, research capacity and data systems.
- **Supplement not Supplant:** Continue to fund programs that have demonstrated some level of effectiveness, met the program requirements, and targeted underserved students as defined in the Register.

**Proposed Priorities**

**Proposed Priority 3 - Expansion: Projects Supported by Strong Evidence**

Under proposed priority 3, expanding a program that demonstrates strong evidence means that there is “evidence of the effectiveness of a key project component in improving a relevant outcome for a sample that overlaps with the populations and settings from studies that are in or meet the standards of the What Works Clearinghouse (WWC).” Currently, very few studies present findings that apply direct to first-generation students, students of color, community colleges, Historically Black Colleges and Universities (HBCUs), Tribal Colleges and Universities (TCUs), and other Title IV institutions in the WWC.

**Recommendation:** As community colleges and Title IV institutions come together to apply for an Expansion Grant under this priority, the Department should put in place processes to expedite the review of eligible studies that PSSG applicants can use that overlap and reflect their student populations and institution types. Sustained student support over multiple years has consistently been shown to improve student retention and graduation rates.

- The Department should prioritize efforts that provide long-term, continuous support to students. While single-course or low-cost technological interventions may enhance course-specific outcomes, they are unlikely to impact multi-year retention and graduation rates significantly.
- The Department should also provide institutions with clear guidance on how to submit a relevant study for review to determine if a study meets WWC standards. This guidance should also include steps to ensure these institutions have an equitable opportunity to
Proposed Priority 4 - Using Data for Continuous Improvement  
We commend the Department’s proposed priority to continue incorporating projects that build upon demonstrated progress toward improved underserved student outcomes or that propose a plan to improve underserved student outcomes. Additionally, we suggest that this approach be an expectation for all projects, ensuring the use of data continually assesses and improves the outcomes associated with funded activities, and sustains data-driven continuous improvement processes at the institution after the grant period.

**Recommendation:** Allowable uses of funds should include data systems, data capacity support, and professional development resources for data and institutional effectiveness researchers. Historically and in the present, institutions that serve large shares of students from these populations often lack the necessary data systems, infrastructure, and capacity to capture and use data for continuous improvement. Students of color and students from low-income backgrounds still face barriers to successfully enrolling in and completing college; therefore, priority should be given to institutions and projects that have specifically made progress on completion rates for students of color, Pell-eligible students, and other intersecting identities marginalized by educational and economic systems in the United States.

Considerations for Proposed Requirements

Proposed Requirement 5 - Supplement-not-Supplant  
We commend the Department for allowing the PSSG to supplement existing completion programs and activities, which will enable institutions to sustain efforts that otherwise might be disrupted and provides institutions opportunities to increase capacity to scale efforts. We support the proposed requirement that grant funds should be used to supplement and sustain funding streams for eligible activities, rather than supplant existing funds. However, pre-existing programs must align with the goals, priorities, allowable uses, and requirements of the PSSG program.

**Recommendation:** Applicants wishing to supplement pre-existing programs should clearly demonstrate indicators of success of their activities with available program data and evaluation findings. As an established program, pre-existing programs should also be asked to meet criteria to qualify for Priorities 2-5, unless the additional PSSG funds will be used to specifically to establish promising evidence through evaluation or a quasi-experimental research design.

Proposed Requirement 7 - Eligible Entities  
We support the proposed eligibility requirement that the lead applicant location must target funding to eligible institutions that have demonstrated commitment to enrolling, retaining, and graduating students of color and low-income students, as measured by enrollment, retention, and completion rates of students of color, Pell-eligible, and first-generation college students.
**Recommendation:** We encourage the Department to fund applicants who demonstrate a clear need for increasing college completion at their institutions by requiring disaggregated performance data to show equity gaps in retention and completion of students of color, Pell-eligible students, and students from other marginalized identities. For-profit institutions have a history of leaving marginalized students with high debt and low-value credentials; they should be excluded from eligibility to apply for PSSG grant funding. These institutions too often offer programs that do not provide graduates with sufficient earnings to repay their debts, disproportionately enrolling students of color and those from low-income backgrounds. Excluding them ensures that funded programs lead to meaningful economic outcomes for all students.

**Considerations for Proposed Definitions**

**Completions of Value**
The Department has defined completions of value as, “credentials that lead to further education through upward transfer or graduate education and/or that lead to economic mobility through earning enough to experience a premium over high school graduates and earning enough to recoup investment in postsecondary education.”

**Recommendation:** Given geographic variation in average earnings, we encourage the Department to consider economic mobility for college completers relative to high school graduates within the labor market where the college exists. Local workforce data may often be employed to produce such measures for a set of professions. This approach will ensure that program goals are best supported by putting all college students and programs on the same plane for program eligibility purposes.

Thank you for the chance to provide input on the proposed priorities, requirements, and definitions for PSSG use and for your leadership in improving and strengthening this important program. For additional information or any points of clarification, please contact Angelica Gutierrez from our team at agutierrez@ticas.org

Sincerely,

Jhenai Chandler, PhD
Senior Director for College Completion Policy