



Report to the Republican Leader,  
Committee on Education and Labor,  
House of Representatives

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December 2020

# HIGHER EDUCATION

## Department of Education Should Further Assess College Access Grant Programs

December 2020

Highlights of [GAO-21-5](#), a report to the Republican Leader, Committee on Education and Labor, House of Representatives

**Why This Matters**

The Department of Education gives grants to schools and organizations that provide disadvantaged students with services to help them attend college. These eight grant programs are collectively known as “TRIO”, named for the original three programs.

Congress provides over \$1 billion each year to these programs, but Education could do more to understand how well these grants work to help students.

**Key Takeaways**

Education could improve the information it has about TRIO programs in two areas: (1) grantee performance data, and (2) program assessments.

Schools and organizations report data to Education to show how the TRIO grants they receive have been working. For example, organizations that receive grants to encourage students to complete college report on the numbers and percentages of students who received services and earned degrees.

Education evaluates grantees’ performance using the self-reported data, but has done little to verify the data. Accurate performance data are important because returning grantees can earn points for past performance in the next grant competition—increasing the likelihood that they will receive new grants. Almost 80 percent of recent TRIO grants went to returning grantees.

Therefore, grantees may have an incentive to report a more positive picture than warranted. Officials from an organization representing TRIO grantees told us there is a risk that some grantees may report inaccurate information.

As for assessing the individual TRIO programs, studies of some programs are outdated. In addition, Education has never assessed the effectiveness of three of the seven TRIO programs that serve students, and did not have any new assessments planned as of August 2020.

**TRIO PROGRAM GOALS**

helping disadvantaged students to:



**PROCESS**



**Program**  
*sends money to grantees.*

**Grantees**  
*provide services to students.*

**Students**  
*receive school-related services.*

Source: GAO analysis of Department of Education documents. | GAO-21-5

**How GAO Did This Study**

We analyzed data from Education about TRIO grantees and applicants. We also reviewed relevant federal laws and regulations and agency documents, and interviewed Education officials and other TRIO stakeholders.

**What GAO Recommends**

Education should take additional steps to ensure the reliability of grantees’ performance data and develop a plan for assessing the effectiveness of the TRIO programs that serve students. Education generally agreed with our recommendations.

For more information, contact: Melissa Emrey-Arras at (617) 788-0534 or [emreyarrasm@gao.gov](mailto:emreyarrasm@gao.gov)

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### Abbreviations

Education	Department of Education
HEA	Higher Education Act of 1965, as amended
TRIO	Federal TRIO Programs

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December 17, 2020

The Honorable Virginia Foxx  
Republican Leader  
Committee on Education and Labor  
House of Representatives

Dear Dr. Foxx:

In recent years, Congress has provided over \$1 billion annually for eight college access grant programs known as the Federal TRIO programs (TRIO). These programs assist approximately 800,000 disadvantaged students with preparing for, enrolling in, and graduating from college. Administered by the Department of Education's (Education) Office of Postsecondary Education, TRIO provides over 3,000 competitive grants to organizations across all 50 states.<sup>1</sup> Grantees are primarily colleges, but school districts and community organizations also receive these grants. TRIO primarily serves low-income and first-generation students as well as individuals with disabilities, and veterans, among others.<sup>2</sup> Many of the populations targeted by TRIO generally experience lower levels of college attendance and postsecondary degree achievement than their peers, which lessens their chances of higher lifetime earnings.

The Higher Education Act Amendments of 1968 consolidated a trio of programs, Upward Bound, Talent Search, and the program that is now called Student Support Services, into TRIO.<sup>3</sup> TRIO expanded to include five additional programs between 1972 and 1990, and there are now eight programs still known collectively as TRIO. Each program serves a specific population at different stages of educational pursuit, including middle school, high school, college, and graduate school. Education awards grants in each program through competitive processes based on the applicants' capacity, plans, and prior experience operating TRIO

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<sup>1</sup>See 20 U.S.C. §§ 1070a-11 to 1070a-18.

<sup>2</sup>For purposes of the TRIO programs, low-income individuals are those from a family whose taxable income in the calendar year prior to their initial participation in the program did not exceed 150 percent of the family income levels established by the Census Bureau for determining poverty status. Additionally, first-generation college students generally are those (1) whose parents did not complete a bachelor's degree or (2) who regularly resided with and received support from only one parent who did not complete a bachelor's degree.

<sup>3</sup>See Pub. L. No. 90-575, § 105, 82 Stat. 1014, 1018-19.

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programs.<sup>4</sup> While these programs have existed for at least 30 years, there has been recent interest in knowing more about their effectiveness.

You asked us to review a broad range of issues related to the Federal TRIO programs, including how Education scores grant applications and assesses TRIO programs. This report examines: (1) how the additional points Education awards to returning TRIO grantees based on prior experience affect which applicants receive grants; (2) the types of colleges and other entities that receive these grants, and the extent to which colleges receiving grants enroll disadvantaged students; and (3) the extent to which Education assesses the results of the TRIO grant programs.

To address all three objectives, we reviewed relevant federal laws and regulations, including the Higher Education Act of 1965, as amended, (HEA).<sup>5</sup> We also interviewed Education officials, representatives from a policy research organization who have studied TRIO programs, and officials from an organization representing TRIO grantees.

To examine the additional points Education awards to returning TRIO grantees based on prior experience, we analyzed Education's applicant data for grant competitions from fiscal years 2015 through 2017—the most recent competitions at the time we began our review.<sup>6</sup> We assessed the reliability of these data by examining them for outliers or potential errors, reviewing related documentation, and interviewing knowledgeable Education officials about how they collect these data. Based on these efforts, we found these data to be sufficiently reliable for the purposes of reporting how these points affect which applicants receive grants. We examined the total scores for all applicants, including experience points awarded to returning grantees. In order to determine how experience points may have affected the number of returning grantees that won new grants, we excluded these points from total scores and ranked all of the

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<sup>4</sup>The Higher Education Act of 1965, as amended, (HEA) generally requires Education to consider prior experience in making grants under TRIO. See 20 U.S.C. § 1070a-11(c)(2).

<sup>5</sup>See Pub. L. No. 89-329, 79 Stat. 1219 (codified as amended at 20 U.S.C. §§ 1001 et seq.).

<sup>6</sup>TRIO grant competitions are staggered, and most competitions take place every 5 years. We excluded the Training Program for Federal TRIO Programs from our analyses because this program does not directly serve students. It provides grants to colleges and nonprofits to provide training and professional development for project directors and staff employed in TRIO programs.

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applicants.<sup>7</sup> We also interviewed Education officials to learn about how they score applications.

To describe the types of colleges and other entities that receive TRIO grants, we analyzed Education data regarding TRIO grantees that received funding in fiscal year 2018—the most recent data available at the time we began our review. To assess the reliability of these data, we interviewed knowledgeable Education officials and tested the data for errors. We found these data to be sufficiently reliable for the purposes of reporting the number of TRIO grantees and types of entities that receive TRIO grants. To assess the extent to which colleges receiving grants enroll disadvantaged students, we also used data from Education’s College Scorecard for academic year 2017-2018, the year that corresponded with Education’s most recent data on TRIO grantees. The College Scorecard is a database that combines information on colleges from several Education sources including the Free Application for Federal Student Aid, the National Student Loan Data System, and the Integrated Postsecondary Education Data System. Specifically, we analyzed data on the overall population of students at colleges that receive TRIO grants, including the overall proportion of students who receive Pell Grants (need-based federal grants to undergraduate students) and first-generation students. For this analysis, we examined the demographics of all students enrolled in colleges that receive TRIO grants, not just students who received TRIO services at these colleges. We reviewed documentation about how data are collected and tested the underlying data for outliers. We found these data to be sufficiently reliable for the purposes of reporting the proportion of students who receive Pell Grants and first-generation students.

Although some TRIO programs also target students with disabilities and veterans, detailed data were not available for a high proportion of colleges nationwide on the number of these students they enroll. Therefore, we did not analyze the proportion of students with these characteristics enrolled at colleges that receive TRIO grants. We did include data on the characteristics of the small number of public school districts that received TRIO grants to provide context about additional

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<sup>7</sup>Education ranks applicants by total scores and awards grants until the available funding is exhausted.

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grantees.<sup>8</sup> However, we were unable to present comparable data on the characteristics of the nonprofit and other organizations that receive TRIO grants because similar information about these organizations is not available.

To examine the extent to which Education assesses TRIO program results, we reviewed Education's program goals and performance metrics. We also reviewed assessments of TRIO programs published over the past 15 years and the three most recent years of annual performance reports. We compared Education's efforts to assess the results of TRIO programs against leading practices for performance and program assessments, as well as standards for project management.<sup>9</sup>

We conducted this performance audit from June 2019 to December 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

### Overview of Federal TRIO Programs

TRIO provides services for individuals from disadvantaged backgrounds so they can prepare for, enroll in, and graduate from college or graduate school. TRIO grantees can include colleges, school districts, and community organizations, among others. Seven of the programs serve students through these grantees, while the eighth is a training program for directors and staff of TRIO projects (see table 1). Grantees provide required services, which may include academic tutoring or course selection advice, depending on the program. Grantees can also provide a

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<sup>8</sup>We used the American Community Survey, an annual survey conducted by the Census Bureau, to provide information on the number of students in these school districts whose parents had less than a bachelor's degree. Once in college, these students are considered first-generation college students by Education. We used data from Education's Office of Civil Rights to obtain information on the number of students in these school districts who were eligible to receive free and reduced-price lunch, an indicator of low-income students.

<sup>9</sup>See Project Management Institute, Inc., *A Guide to the Project Management Body of Knowledge* (PMBOK® Guide), Sixth Edition (2017). PMBOK is a trademark of Project Management Institute, Inc.



range of permissible services to program participants, including mentorships, counseling, and exposure to higher education.

**Table 1: Overview of Federal TRIO Programs**

<b>Program name (year founded)</b>	<b>General purpose<sup>a</sup></b>	<b>Number of grantees and participants (fiscal year 2018)</b>
Upward Bound (1964)	College preparation for high school students	967 grantees 70,852 participants
Talent Search (1965)	High school completion and college enrollment assistance for individuals who are age 11-27	473 grantees 309,905 participants
Student Support Services (1968)	Supports college students in completing their degree	1,069 grantees 202,795 participants
Educational Opportunity Centers (1972)	College enrollment assistance for adult students	140 grantees 193,530 participants
Veterans Upward Bound (1972)	Helps military veterans prepare for college	62 grantees 8,157 participants
Training Program for Federal TRIO Programs (1976)	Provides professional development for TRIO staff	12 grantees Does not directly serve students
Ronald E. McNair Postbaccalaureate Achievement (1986)	Helps students prepare for graduate school	187 grantees 5,242 participants
Upward Bound Math and Science (1990)	Prepares high school students for college education programs and careers in math and science	212 grantees 13,184 participants

Source: GAO analysis of Department of Education documents. | GAO-21-5

<sup>a</sup>The TRIO programs that serve students generally require that at least two-thirds of those participating in the program be low-income individuals that are or would be first-generation college students, in addition to serving certain other populations. The exception is Student Support Services, which requires at least two-thirds of those participating be low-income individuals who are first-generation college students or individuals with disabilities; and the remaining participants must be low-income individuals, first generation college students, or individuals with disabilities. In addition, at least one-third of the individuals with disabilities served must also be low-income individuals.

The CARES Act, passed in the wake of Coronavirus Disease 2019, allowed the Secretary of Education to modify the allowable uses for TRIO grants until September 30, 2020.<sup>10</sup> For example, Education allowed grantees to provide computers or other technology to students to enable them to continue learning. Grantees could also receive approval to provide stipends to TRIO participants 18 years or older. As of August 7, 2020, Education granted all requests (more than 260) for modifications under the CARES Act.

<sup>10</sup>See Pub. L. No. 116-136, § 3518, 134 Stat. 281, 409.

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## Award Process

Education holds grant competitions every 5 years for the seven TRIO programs that serve students and awards these grants for a period of 5 years.<sup>11</sup> Education can cancel grants during this period if grantees fail to meet certain annual performance targets, such as by serving fewer students than proposed in their applications. The competitions are staggered, so not all programs hold a competition during the same year. Education awards new grants based on scores derived from applications and the performance of returning grantees.

- **Application score.** Each application receives an application score, which is the average of scores awarded by three peer reviewers.<sup>12</sup> These reviewers score applications based on numerous criteria that are mostly specified in program regulations.<sup>13</sup> For example, in most TRIO competitions, applicants can receive up to 24 points for demonstrating the need for a project in the proposed community. Additionally, peer reviewers award applicants points based on the extent to which their performance targets are attainable and ambitious. During competitions that took place from fiscal year 2015 through 2017, the maximum possible application score ranged from 103 to 110 points, for the seven TRIO programs we analyzed.<sup>14</sup>
- **Experience points.** Education awards up to 15 additional points to returning grantees based on the extent to which they met performance targets specified in their most recent grant application.<sup>15</sup> The level of consideration given to prior experience (i.e., the possible number of experience points) and the performance metrics Education

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<sup>11</sup>Grants for the Training Program for Federal TRIO Programs are awarded for a period of 2 years, and Education holds a grant competition for this program every 2 years.

<sup>12</sup>Education refers to this score as “the average reader score.” For the purposes of this report, we refer to this score as the application score.

<sup>13</sup>See 34 C.F.R. pts. 643-647. Under TRIO program regulations, the maximum score for all criteria is generally 100 points. However, Education awards additional points (competitive preference) for TRIO applications that meet established annual priorities. Education describes these priorities in announcements for each grant competition.

<sup>14</sup>We excluded the Training Program for Federal TRIO Programs from our analyses because it does not directly serve students. This program has a maximum application score of 75 points.

<sup>15</sup>Generally under the HEA, Education is required to consider prior experience in making grants under TRIO. See 20 U.S.C. § 1070a-11(c)(2). Education refers to points awarded based on prior experience as “prior experience points.” They are specific to each grantee’s performance in a particular program and do not transfer across programs. For the purposes of this report, we refer to these points as experience points.

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uses to calculate these points are set in statute.<sup>16</sup> As part of their grant application, grantees determine their own performance target for each metric.<sup>17</sup> Education uses the results that grantees submit in their annual performance reports to calculate how many experience points to award returning grantees during the next grant competitions.

Education awards grants based on an applicant's total score, which is the sum of the application score and experience points.<sup>18</sup> For applicants who do not receive experience points, their application score and total score are the same (see fig. 1).<sup>19</sup> Education ranks applicants by total scores and awards grants until the available funding is exhausted.<sup>20</sup>

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<sup>16</sup>See 20 U.S.C. § 1070a-11(c)(2)(A) & (f). Additionally, the Office of Management and Budget encourages agencies to consider the past performance of grantees when awarding new grants. Awarding grants to recipients with prior experience may provide assurance that future grants will achieve similar results. See Office of Management and Budget, *Managing for Results: The Performance Management Playbook for Federal Awarding Agencies* (Washington, D.C.: Apr. 27, 2020).

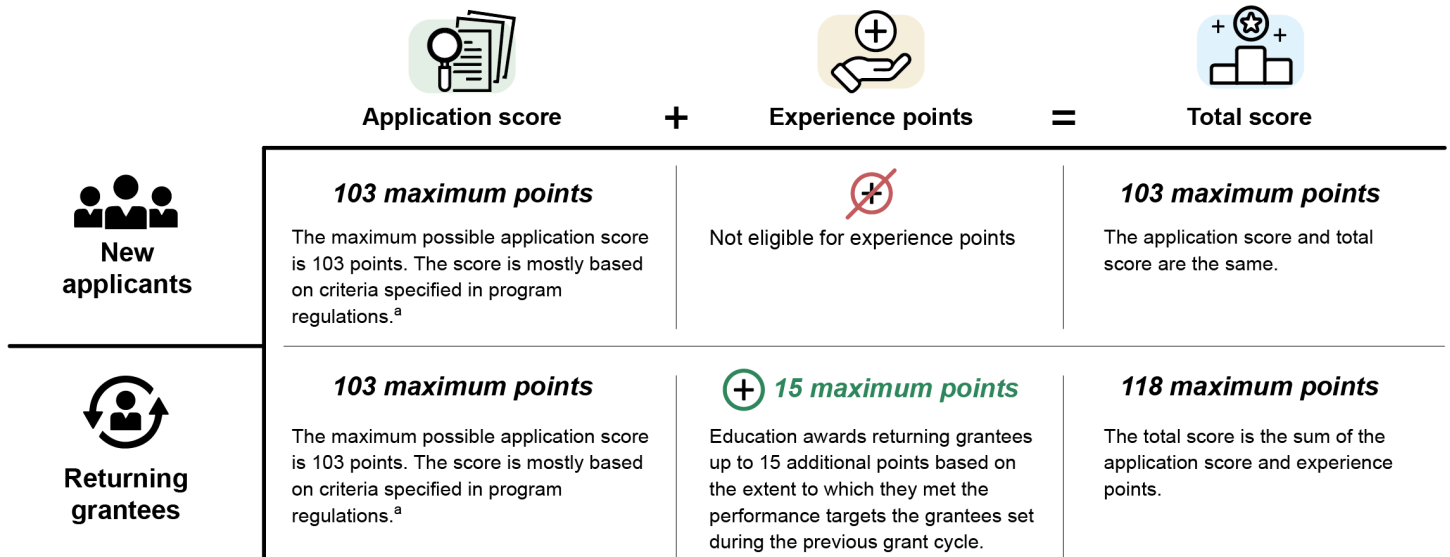
<sup>17</sup>Experience points are based on the performance targets grantees set in the previous grant cycle as part of their application.

<sup>18</sup>See 20 U.S.C. § 1070a-11(c)(2)(A) & (f). Additionally, the HEA requires Education to award TRIO grants in the order of the scores received by the application for such a grant in the peer review process and adjusted for prior experience. See 20 U.S.C. § 1070a-11(c)(3)(A). Furthermore, the HEA also requires Education to consider the needs of eligible participants in the area, institution of higher education or secondary school to be served. See 20 U.S.C. § 1070a-11(c)(2)(B).

<sup>19</sup>The Training Program for Federal TRIO Programs only considers experience points when there is a tie in application scores and there is not enough funding for each applicant with that same application score. In those instances, Education adds experience points to determine an adjusted total score for those applications. As previously noted, we excluded this program from our analyses because it does not directly serve students.

<sup>20</sup>If two or more applicants receive the same total score and there is not enough funding to award them all with grants, Education will generally choose among the tied applicants to serve geographic areas and eligible populations that have been underserved by the program. Statutory provisions establish a minimum grant award for the student-serving TRIO programs, unless the applicant requests a smaller amount. See 20 U.S.C. § 1070a-11(b)(3).

**Figure 1: Example of Scoring Components of Federal TRIO Program Grant Competitions, Fiscal Year 2017 Upward Bound Competition**



Source: GAO analysis of Department of Education (Education) documents. | GAO-21-5

<sup>a</sup>Under TRIO program regulations, the maximum score for all criteria is generally 100 points. However, Education awards additional points (competitive preference) for TRIO applications that meet established annual priorities. Education describes these priorities in announcements for each grant competition. The points that applicants receive for meeting these annual priorities are part the application score. Experience points are subsequently added to the application score.

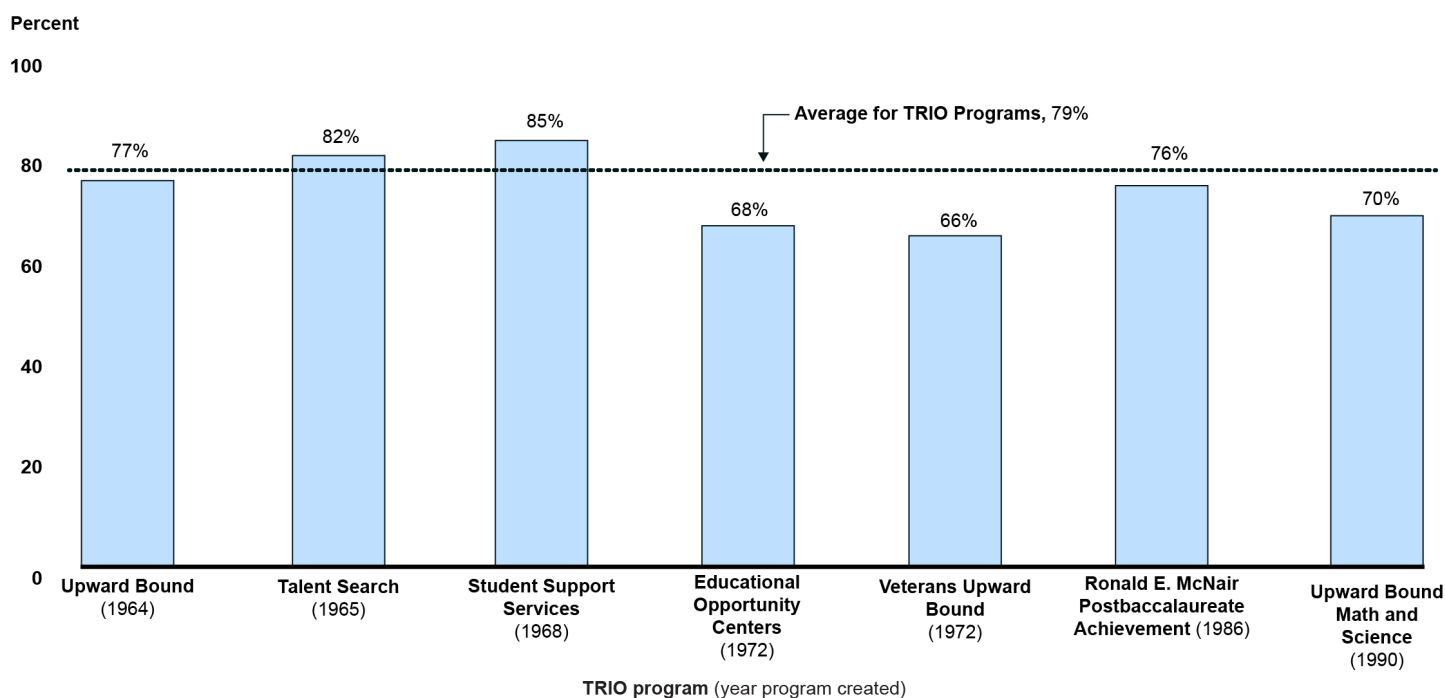
## Returning Grantees Are More Likely to Receive New TRIO Grant Awards Partially Due to Experience Points

Education Awarded Almost 80 Percent of Recent TRIO Grants to Returning Grantees

Returning grantees won the majority of new grant awards from fiscal years 2015 through 2017. According to our analysis of Education’s data, returning grantees represented 51 percent of applicants and won 79

percent of new grant awards during this period.<sup>21</sup> Education’s longest-running TRIO programs, Upward Bound, Talent Search, and Student Support Services, awarded the highest percentages of grants to returning grantees (see fig. 2).

**Figure 2: Percentage of Grants Awarded to Returning Grantees in Most Recent Federal TRIO Program Grant Competitions, Fiscal Years 2015-2017**



Source: GAO analysis of TRIO grant competition data from the Department of Education. | GAO-21-5

Notes: GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.

The Department of Education holds grant competitions every 5 years for these seven TRIO programs and awards these grants for a period of 5 years. The competitions are staggered, so not all programs hold a competition during the same year.

<sup>21</sup>During this time, there were 5,178 applicants, of which 2,665 were returning grantees. Returning grantees won 2,479 out of 3,121 new grant awards. Organizations can apply for and receive multiple grants within one program, and also across programs.

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Returning grantees were also more likely to win grants compared to new applicants. Specifically, 93 percent of returning grantees won grants compared to 26 percent of new applicants.

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### About 20 Percent of Returning Grantees Were Awarded New Grants as a Result of Receiving Experience Points

Under the HEA, Education is generally required to consider prior experience in making grants under TRIO.<sup>22</sup> According to our analysis of new grant awards from fiscal years 2015 through 2017, 23 percent of applicants that were awarded grants and received experience points won these awards over new applicants that had higher application scores.<sup>23</sup> When we ranked applicants based solely on their application scores (i.e., without experience points), we found that fewer returning grantees would have won awards.<sup>24</sup> Specifically, if the most recent grant competitions did not factor prior experience into scores, the number of new grantees participating in the program would have almost doubled (see fig. 3).

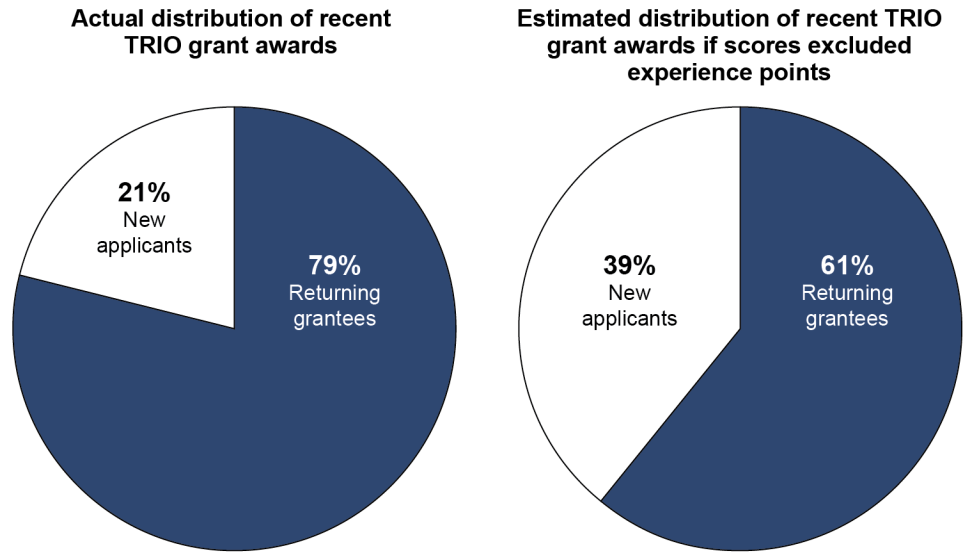
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<sup>22</sup>See 20 U.S.C. § 1070a-11(c)(2).

<sup>23</sup>The remaining 77 percent of grantees that received experience points had high enough application scores based on the other criteria that they could have won awards if total scores excluded experience points.

<sup>24</sup>The number of awards depends on the funding each grantee receives. As part of its competition announcement, Education estimates the number of grants it will award based on the average dollar amount it expects each grantee to receive. Our analysis assumes the number of grant awards would remain the same. However, in an actual competition the number would change slightly depending on the funding each grantee receives.

**Figure 3: Distributions of Most Recent Federal TRIO Program Grant Competition Outcomes and Estimated Outcomes without Experience Points, Fiscal Years 2015-2017**



Source: GAO analysis of TRIO grant competition data from the Department of Education. | GAO-21-5

Notes: Generally, under the Higher Education Act of 1965, as amended, Education is required to consider prior experience in making grants under TRIO. See 20 U.S.C. § 1070a-11(c)(2).

The number of awards depends on the funding given to each grantee. For this estimate, GAO assumed the number of grant awards would remain the same, when in reality, the number would change slightly depending on the funding given to each grantee.

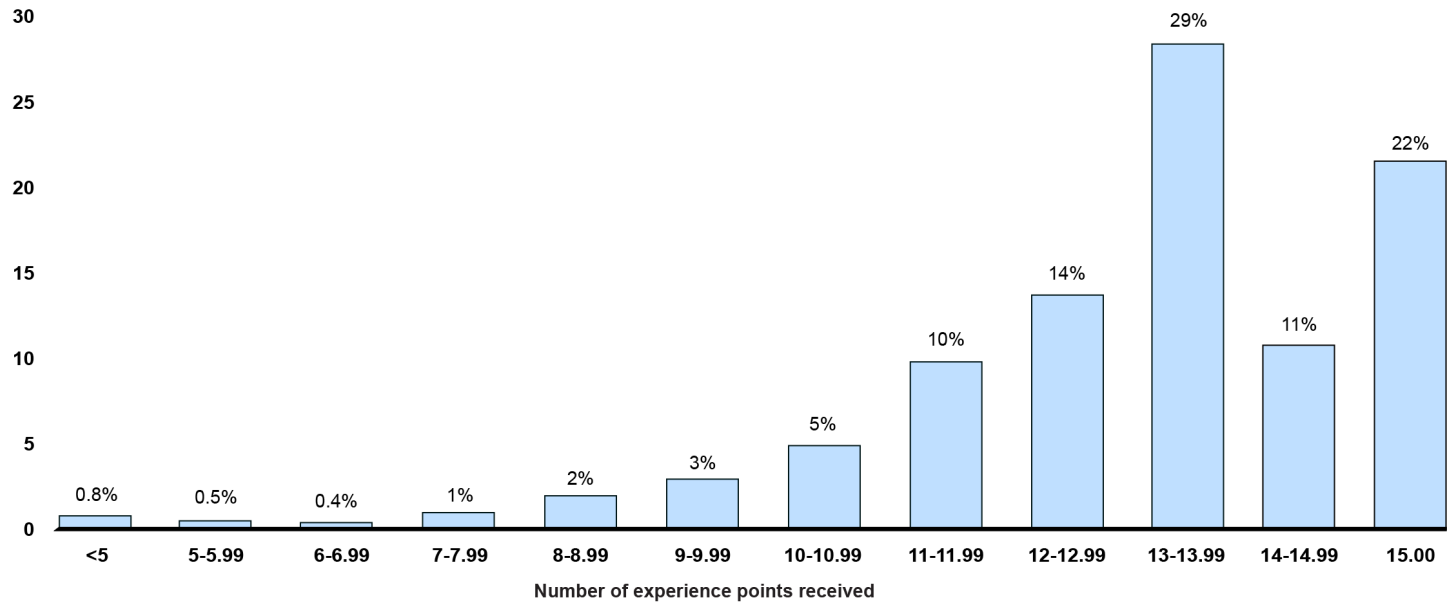
GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.

The Department of Education holds grant competitions every 5 years for the seven TRIO programs that serve students and awards these grants for a period of 5 years. The competitions are staggered, so not all programs hold a competition during the same year.

Education awarded most returning grantees a high number of the 15 possible experience points based on their performance in past years. For example, Education awarded 92 percent of returning grantees at least 10 experience points (see fig. 4). According to Education officials, it is possible for returning grantees not to receive experience points if they fail to meet the performance targets specified in the grantees' previous applications. We found that only one out of the 2,665 returning grantees that applied for new grants in fiscal years 2015 through 2017 did not receive any experience points.

**Figure 4: Experience Points Returning Grantees Received in Most Recent Federal TRIO Program Grant Competitions, Fiscal Years 2015-2017**

Percent of returning grantees



Source: GAO analysis of TRIO grant competition data from the Department of Education. | GAO-21-5

Notes: GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.

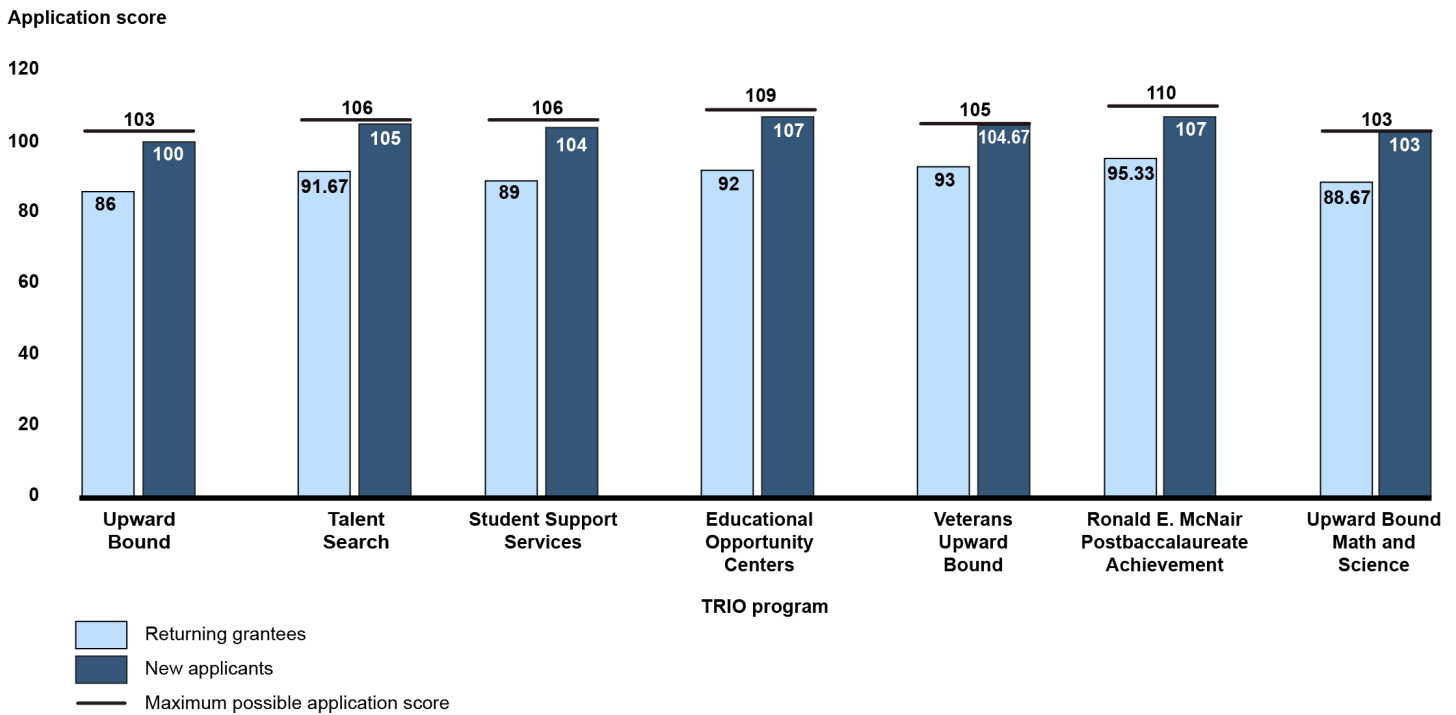
The percentages in this figure do not add to 100 due to rounding.

The Department of Education holds grant competitions every 5 years for the seven TRIO programs that serve students and awards these grants for a period of 5 years. The competitions are staggered, so not all programs hold a competition during the same year.

The only new applicants that won awards during the most recent grant competitions were those with nearly perfect application scores. For example, in the Upward Bound Math and Science program, new applicants needed a perfect application score to receive a grant. Similarly, new applicants in other programs had to score within one-third of a point to three points of a perfect score to receive a grant. In contrast, some returning grantees won new grants despite having lower application scores because they received experience points, and thus had higher total scores (see fig.5).



**Figure 5: Lowest Application Score of Grant Winners in Most Recent Federal TRIO Program Grant Competitions, Fiscal Years 2015-2017**



Source: GAO analysis of TRIO grant competition data from the Department of Education (Education). | GAO-21-5

Note: This figure only shows application scores, which reflect the average of scores awarded by three peer reviewers. Under TRIO program regulations, the maximum score for all criteria is generally 100 points. Additionally, Education awards points for TRIO applications that meet established annual priorities. The points that applicants receive for meeting these annual priorities are part of the application score and thus, included in this figure.

This figure does not include the additional points Education awards to TRIO grantees based on prior experience (i.e., experience points). Education uses total scores, which include both application scores and experience points, to award grants.

GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.

The Department of Education holds grant competitions every 5 years for these seven TRIO programs and awards these grants for a period of 5 years. The competitions are staggered, so not all programs hold a competition during the same year.

Education officials told us that experience points have benefits and drawbacks. Specifically, they noted experience points enable continuity of services for students receiving services through TRIO grants, but the points also reduce the number of new grantees that are awarded grants. Our analysis confirms that returning grantees have participated in TRIO over the course of many years. For example, a majority of returning

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grantees (74 percent) received their first grant at least a decade ago and 42 percent received their first grant at least 20 years ago.<sup>25</sup>

Stakeholders we interviewed differed on their views of the value of experience points. Representatives from a policy research organization who have studied TRIO programs told us that experience points might prevent new applicants with promising proposals from winning awards. In contrast, officials we spoke to at the organization representing TRIO grantees said experience points are important because they help stabilize funding for supportive services that low-income students need in order to persist in college. These officials also noted that, since the goal of TRIO programs is to help disadvantaged students overcome nonfinancial obstacles to higher education, steady funding streams can help ensure these students have consistent access to necessary services.

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## Public Colleges Are the Primary Recipients of TRIO Grants and Participating Colleges Enroll Varying Proportions of Disadvantaged Students

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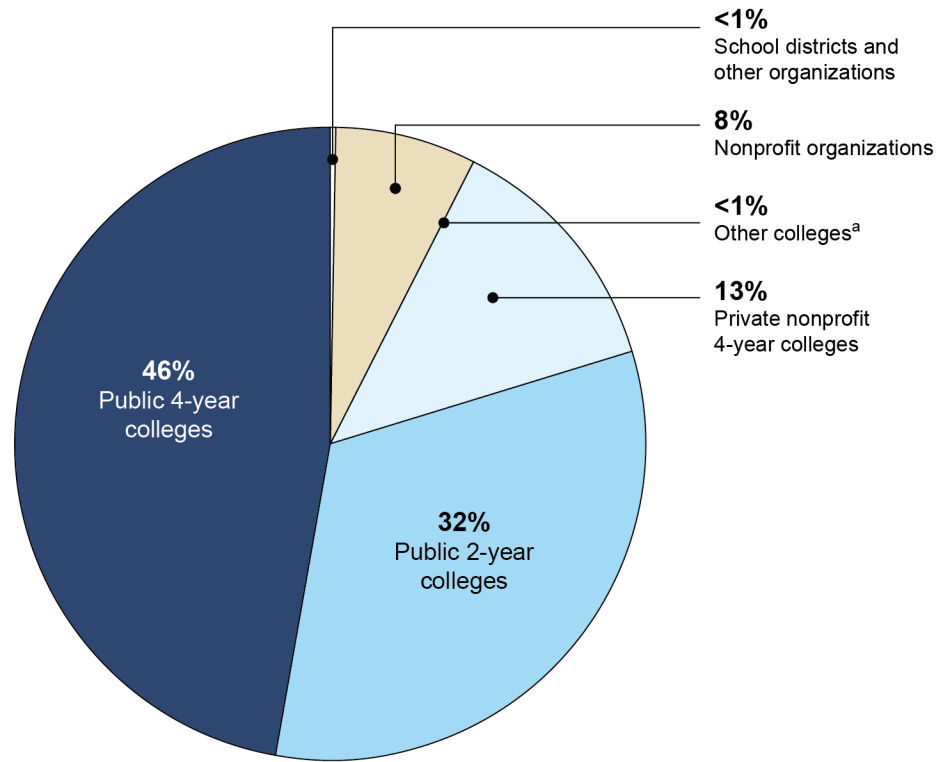
### The Majority of TRIO Grantees Are Public Colleges

In fiscal year 2018, 92 percent of TRIO grantees were colleges, according to our analysis of Education data. The majority of these colleges were public institutions. Nonprofit organizations, school districts, and other organizations, such as those that provide services to school districts, also received TRIO grants (see fig. 6).

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<sup>25</sup>These data reflect the first year an organization won a grant in a particular program, and do not indicate that each grantee held their grant continuously during that time. Additionally, according to Education officials, Education's electronic record files begin in 1993. Therefore, it is unknown what year some organizations first received a grant.

**Figure 6: Federal TRIO Program Grantees by Type, Fiscal Year 2018**



Source: GAO analysis of fiscal year 2018 TRIO grantee data from the Department of Education. | GAO-21-5

Notes: GAO categorized college grantees based on the highest undergraduate degree they offer: 2-year colleges issue associate’s degrees, and 4-year colleges issue bachelor’s degrees. Additionally, GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.

<sup>a</sup>Other colleges are generally private nonprofit 2-year colleges except for one grantee that is a for-profit college.

### Colleges That Receive TRIO Grants Enroll Varying Proportions of Disadvantaged Students

TRIO programs generally serve disadvantaged students—including low-income students and first-generation students, among others—but colleges that receive TRIO grants enroll varying proportions of these students in their overall student population. This is in part because program participants do not necessarily enroll in the colleges from which they receive TRIO services.<sup>26</sup> For example, Talent Search grantees,

<sup>26</sup>Two exceptions are the Ronald E. McNair Postbaccalaureate Achievement and Student Support Services programs. Participants in these programs must be enrolled or accepted for enrollment at the college that provides them TRIO services.

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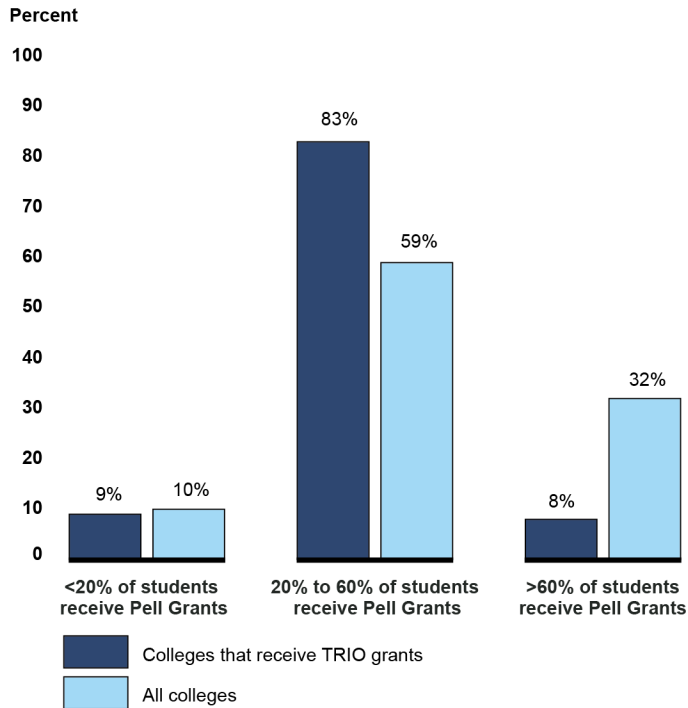
many of which are colleges, provide services to participants as young as 11 to help them complete high school and enroll in the college of their choice. Further, TRIO college grantees are not required as part of their participation in TRIO to enroll certain proportions of disadvantaged students in their general student populations.<sup>27</sup>

Our analysis of Education data on students receiving Pell Grants shows that colleges that receive TRIO grants enroll varying proportions of low-income students (see fig. 7). Pell Grants provide need-based federal financial aid to low-income undergraduate students. The proportion of students who received Pell Grants ranged from 9 percent to 98 percent in fiscal year 2018 at colleges that receive TRIO grants. The median proportion of students who received Pell Grants at these colleges was 35 percent, which is below the national median of 46 percent of students enrolled in colleges overall.

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<sup>27</sup>In certain programs, such as Student Support Services, Education uses the proportion of disadvantaged students at the institution as one of the criteria to assess applicants.

**Figure 7: Proportion of Pell Grant Recipients Enrolled at Colleges That Receive Federal TRIO Program Grants Compared to All Colleges, Fiscal Year 2018**



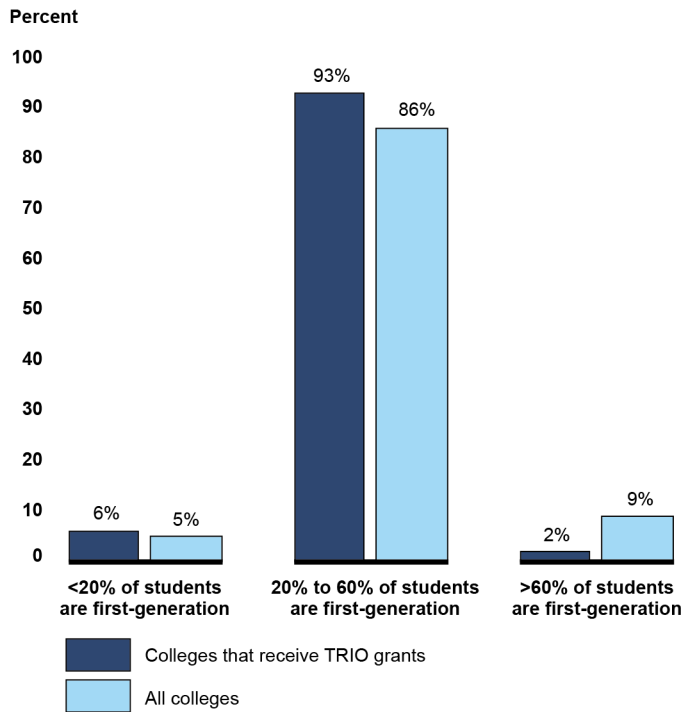
Source: GAO analysis of College Scorecard and fiscal year 2018 TRIO grantee data from the Department of Education. | GAO-21-5

Notes: GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.

The percentages in this figure do not add to 100 due to rounding.

Similarly, colleges that receive TRIO grants enroll varying proportions of first-generation students (see fig. 8). The proportion of students who were first-generation ranged from 10 percent to 70 percent in fiscal year 2018 at these colleges. The median proportion of first-generation students enrolled in these colleges was 41 percent, which is below the national median of 48 percent of students enrolled in colleges overall.

**Figure 8: Proportion of First-Generation Students Enrolled at Colleges That Receive Federal TRIO Program Grants Compared to All Colleges, Fiscal Year 2018**



Source: GAO analysis of College Scorecard and fiscal year 2018 TRIO grantee data from the Department of Education. | GAO-21-5  
 Notes: GAO excluded the Training Program for Federal TRIO Programs from this analysis because it does not directly serve students.  
 The percentages in this figure do not add to 100 due to rounding.

Approximately 11 percent of all colleges that receive TRIO grants have overall student populations that consist of less than 20 percent of students who receive Pell Grants or are first-generation students. Private nonprofit colleges that receive TRIO grants, on average, have lower proportions of Pell Grant recipients and first-generation students than public colleges that receive TRIO grants.

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**Characteristics of Public School Districts That Received TRIO Grants in Fiscal Year 2018**

In fiscal year 2018, eight public school districts received TRIO grants. These school districts have moderate to high proportions of low-income and potential first-generation college students in their districts. In these districts the proportion of students eligible for free and reduced-price lunches, a proxy for low-income status, ranged from 34 percent to 100 percent. Similarly, the proportion of students who are potential first-generation college students ranged from 54 percent to 97 percent, for the seven school districts for which this information was available.

Source: GAO analysis of American Community Survey data and data from the Department of Education's Office for Civil Rights. | GAO-21-5

Officials from the organization representing TRIO grantees we spoke to stated that a wide variety of colleges provide services to students through TRIO, including those that traditionally serve a greater proportion of higher-income students. Moreover, they said one of the purposes of TRIO is to help low-income, first-generation, and other disadvantaged students to prepare for and enroll in all types of colleges and universities. They added that Education encourages students participating in TRIO to apply to all types of schools, not just those with high concentrations of other low-income students.<sup>28</sup>

Education also awards TRIO grants to some public school districts, which serve moderate to high proportions of disadvantaged students (see sidebar).

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## Education Measures TRIO Performance, but Has Taken Few Steps to Verify Results or Assess Effectiveness of Some Programs

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<sup>28</sup>They also noted that low-income students may improve their chances of graduation by attending more competitive institutions even if these colleges do not enroll high percentages of low-income students.

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## Education Uses Program Goals and Performance Metrics, but Has Taken Few Steps to Ensure the Reliability of Results Grantees Report

Education uses program goals and performance metrics to measure TRIO performance.<sup>29</sup> The overall goal for TRIO is to increase the percentage of low-income, first-generation college students who pursue higher education and complete college. Each program also has specific goals. For instance, a goal of Student Support Services, which had the most TRIO grantees in fiscal year 2018, is to increase the college retention and completion (i.e., graduation) rates of its participants. Student Support Services grantees measure progress toward that program's goal by reporting the number of students who received services, along with the percentage of first-time college students who participated in the program and graduated from their college on time, among other metrics. Similarly, other programs also have performance metrics that track progress toward their goals. Education annually submits a report to Congress that documents the performance metrics of all TRIO programs, as required under the HEA.<sup>30</sup>

To measure TRIO's program performance, Education uses individual reports from thousands of grantees. Education annually collects data from each TRIO grantee on the extent to which it met its targets related to its performance metrics.<sup>31</sup> Education provides guidance to grantees on submitting results in their annual performance reports. Specifically, Education instructs grantees to report on the eligibility of program participants (e.g., if they are first-generation, low-income students), the types of services provided, and the educational attainment outcomes for participants. Education uses these data in several ways: (1) to measure progress toward program goals; (2) to make decisions about annually

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<sup>29</sup>We have previously reported that these are key components of effective program performance assessment. Program goals communicate what the agency proposes to accomplish and performance metrics permit the measurement of progress made toward the agency's goals. For more information on performance assessment, see GAO, *Performance Measurement and Evaluation: Definitions and Relationships*, [GAO-11-646SP](#) (Washington, D.C.: May 2, 2011).

<sup>30</sup>See 20 U.S.C. § 1070a-18(a).

<sup>31</sup>During the application process, grantees set their own targets for these performance metrics, such as the number of participants who enroll in college. Education's peer reviewers rate applicants based on the extent to which their performance targets are attainable and ambitious.



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continuing grants<sup>32</sup>; and (3) as the basis of the experience points grantees receive when applying for a new grant.

Although Education uses these data for decision-making, there is a risk that the data may not always be reliable. Education evaluates grantees using self-reported data about the extent to which they met their performance targets, and our analysis found that grantees who receive experience points for meeting their targets are more likely to win new grants. Therefore, grantees may have structural incentives to report results that would increase the likelihood of receiving a future award. This raises concerns about the reliability of the data grantees submit regarding the extent to which they met their performance targets. For example, officials from the organization representing TRIO grantees told us that with over 3,000 grantees reporting annually, there is a risk that some grantees may report inaccurate information.<sup>33</sup>

Education does not routinely review the data grantees self-report about their results to help ensure their accuracy. While grantees are required to sign a statement attesting that the information they provide is true under the penalty of the law, there are few quality checks on this information. Education officials stated that they monitor grantee results for large fluctuations in reported performance from year to year or if a grantee does not meet its performance targets.<sup>34</sup> However, the vast majority of grantees report meeting their performance targets. Focusing monitoring efforts on grantees that do not meet their targets limits Education's ability to detect problems grantees do not self-report. For example, if a grantee were to incorrectly report meeting its performance targets without large fluctuations in performance, this would likely not be detected by Education's current monitoring. Education officials also stated that the

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<sup>32</sup>After each year during the 5-year grant period, Education uses these performance reports to determine if each grantee should continue to receive the grant for the next year. Education officials told us that they have canceled very few grants during their 5-year grant period.

<sup>33</sup>This organization did not identify any specific instances of grantees reporting inaccurate results. Our analysis focused on Education's monitoring of data reliability risks. We did not review individual grantee data for accuracy.

<sup>34</sup>Education officials stated that they also monitor grantees' programmatic information and financial data for compliance with program requirements and to identify grantees that may need technical assistance.

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agency performs some data checks when conducting site visits.<sup>35</sup> However, Education officials also noted that these site visits occur infrequently due to limited staff and resources. From 2015 through 2019, Education officials stated that the agency conducted an average of 12 site visits per year for about 3,000 TRIO grantees.

Since Education does not routinely review the data grantees report about their results to help ensure their accuracy, the agency may be missing opportunities to more accurately measure TRIO performance. Education's Office of Inspector General previously highlighted broad concerns about the accuracy of the data the agency collects from grantees. In its fiscal year 2020 report on top management challenges, the Office of Inspector General noted concerns about Education's controls over the accuracy and reliability of program performance data grantees provided across the agency's programs.<sup>36</sup> The report stated that effective monitoring and oversight are essential in ensuring grantees meet requirements and achieve program goals. Education officials acknowledged that there is a risk of TRIO grantees reporting errors in their performance data. We have previously reported that a leading practice for assessing grant programs is that agencies should examine grantee performance data for quality and reliability. Examining data reliability could include spot-checking grantee data. It could also include asking questions to grantees and requesting documentation from them about how they collect data and ensure data reliability, and then reviewing these responses and documents.<sup>37</sup> Taking additional steps to review the accuracy of results TRIO grantees submit could help Education ensure that it provides experience points only to returning grantees that have actually met performance targets. It would

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<sup>35</sup>Education officials stated that site visits can be triggered by a complaint of potential fraud, a grantee request for technical assistance, or random selection, among other reasons. They stated that site visits typically involve reviewing a random sample of student records and activity logs to monitor grantee compliance for requirements pertaining to student eligibility, services provided, and educational progress, among other things. They added that these limited data checks have rarely identified cases involving improper or fraudulent activities.

<sup>36</sup>Department of Education, Office of Inspector General, *FY 2020 Management Challenges Facing the U.S. Department of Education* (November 2019).

<sup>37</sup>GAO, *Native American Youth: Agencies Incorporated Almost All Leading Practices When Assessing Grant Programs That Could Prevent or Address Delinquency*, [GAO-20-600](#) (Washington, D.C.: Aug. 6, 2020).

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also help Education better track progress toward meeting its goals and ensure it provides reliable information in its annual reports to Congress.

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### Education Has Studied Some TRIO Programs, but Has Gaps in Its Evidence on Program Effectiveness

Education has studied some TRIO programs and program activities, but has gaps in its evidence on the effectiveness of TRIO.<sup>38</sup> Education has conducted some assessments to identify practices that further the outcome goals of TRIO (as required under the HEA), describe program performance, and examine the overall effectiveness of several individual TRIO programs.<sup>39</sup> While Education's performance metrics monitor progress against each TRIO program's goals, assessments of overall program effectiveness typically examine program performance more in-depth. These assessments typically examine a broader range of information on program performance and its context than is feasible to monitor on an ongoing basis. They also allow for an overall assessment of whether participation in the program leads to better outcomes and whether adjustments may improve results.<sup>40</sup>

However, Education's evidence regarding the effectiveness of TRIO is incomplete in part because:

- **Education has never assessed some programs for overall effectiveness.** Education has assessed the overall program effectiveness of four of the seven TRIO programs that serve students. However, Education has never assessed the overall effectiveness of three programs: Veterans Upward Bound or Educational Opportunity Centers, each of which was founded in 1972, or Ronald E. McNair

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<sup>38</sup>Some of Education's recent studies focus on program activities. For example, Education is currently studying the effect of sending personalized text messages to students in the Educational Opportunity Centers program to see if these messages increase the rates in which students complete the Free Application for Federal Student Aid form and enroll in college. Education expects to release this study in 2022. Studies of program activities inform Education about the effectiveness of certain practices; however, they do not provide Education or Congress information on the overall effectiveness of a given TRIO program. In addition, Education has also published descriptive profiles of some TRIO programs. Education officials stated that the agency plans to review, and potentially publish, further descriptive profiles that will present outcome data associated with program objectives.

<sup>39</sup>The HEA requires Education to rigorously evaluate the effectiveness of TRIO programs for the primary purpose of identifying particular practices that further the achievement of program outcome criteria. See 20 U.S.C. § 1070a-18(b)(1)(A) & (2).

<sup>40</sup>See [GAO-11-646SP](#).

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Postbaccalaureate Achievement, which was founded in 1986.<sup>41</sup> Since each TRIO program has individual goals and targets different populations, an assessment of one TRIO program is not reflective of the other programs' effectiveness.

- **Education's studies of some programs have limited applicability to current participants.** Education's studies of two programs are outdated. For instance, Education's most recent studies of the overall effectiveness of Upward Bound and of Upward Bound Math and Science were based on participants that received services in the mid-1990s, and there were changes to these programs since that time.<sup>42</sup> Specifically, for the Upward Bound program, Education subsequently announced a new priority that limited which students grantees could target to participate.<sup>43</sup> Additionally, the composition of Upward Bound Math and Science grantees has changed since these programs were studied.<sup>44</sup> In light of these changes, these studies' findings may not be directly applicable to current participants.

The HEA currently requires Education to "rigorously evaluate" the effectiveness of TRIO programs for the primary purpose of identifying particular practices that further the achievement of program outcome criteria.<sup>45</sup> The HEA also prohibits Education from requiring grantees to participate in a program study that would require them to deny eligible

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<sup>41</sup>While Education released a study on the Ronald E. McNair Postbaccalaureate Achievement program in 2008, that study did not assess the effectiveness of the program.

<sup>42</sup>Education released the study of Upward Bound in 2009 and the study of Upward Bound Math and Science in 2010. See Department of Education, Office of Planning, Evaluation and Policy Development, Policy and Program Studies Service, *The Impacts of Regular Upward Bound on Postsecondary Outcomes Seven to Nine Years After Scheduled High School Graduation* (Washington, D.C.: 2009) and *The Impacts of Upward Bound Math-Science on Postsecondary Outcomes 7–9 Years After Scheduled High School Graduation* (Washington, D.C.: 2010).

<sup>43</sup>See Upward Bound Program, 71 Fed. Reg. 55,447, 55,447-48 (Sept. 22, 2006). Authors of the 2009 Upward Bound study noted that this change could "substantially modify" the composition of Upward Bound participants. TRIO Program regulations were also amended in 2010. See High School Equivalency Program and College Assistance Migrant Program, The Federal TRIO Programs, and Gaining Early Awareness and Readiness for Undergraduate Program, 74 Fed. Reg. 65,712 (Oct. 26, 2010).

<sup>44</sup>At the time Upward Bound Math and Science participants were studied, nearly 90 percent of grantees were 4-year colleges. Since that time, the proportion of 4-year colleges has decreased.

<sup>45</sup>See 20 U.S.C. § 1070a-18(b)(1)(A) & (2).

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students access to these programs.<sup>46</sup> Education previously interpreted this prohibition as preventing it from performing randomized controlled trials as a method to assess these programs.<sup>47</sup> However, in November 2020, Education noted that it had further reviewed this statutory provision and concluded that the HEA does not universally prohibit the most rigorous evaluations that use a randomly assigned control group (see app. I).<sup>48</sup>

Education may also be able to use various other methods to assess the overall effectiveness of TRIO programs. For example, Education released a study in 2019 that compared outcomes of program participants in the Student Support Services program to demographically similar students who did not participate in the program.<sup>49</sup> Additionally, in our prior work, we have highlighted several types of rigorous assessment methods agencies can use if randomized controlled trials are not possible. These include (1) the quasi-experimental approach that Education used to evaluate the Student Support Services program (i.e., compare the outcomes of participants and non-participants with similar characteristics), (2) statistical analyses of observational data, or (3) in-depth case studies in

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<sup>46</sup>See 20 U.S.C. § 1070a-18(b)(3).

<sup>47</sup>Education's fiscal year 2021 budget justification included a legislative proposal to remove this statutory provision, which would allow Education to assess the overall program effectiveness of TRIO programs using the most rigorous methodological approaches. Education's proposed changes would also allow it to conduct assessments for a broader range of purposes.

<sup>48</sup>For example, Education stated that it could assess the effectiveness of a program in situations where the number of eligible applicants exceeds the number of funded slots for participating students. Education said in such a situation, a TRIO grantee could allocate the available slots among the eligible applicants on a random basis, and any denial of services for an eligible student would be the result of funding limitations, not the result of the random selection. Education noted the effectiveness of the program or project could then be rigorously evaluated using a randomly selected control group, by comparing the students randomly selected to participate in the program with the students randomly selected to not participate in the program.

<sup>49</sup>The study found Student Support Services participants who initially enrolled in 2-year colleges had significantly higher college completion rates than non-participants. However, participants who initially enrolled in 4-year colleges did not complete college at significantly different rates from non-participants. See Department of Education, Office of Postsecondary Education, Student Service, *Comparing Student Outcomes Between Student Support Services Participants and Nonparticipants in the 2004/09 Beginning Postsecondary Students Longitudinal Study* (Washington, D.C.: 2019).

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some circumstances.<sup>50</sup> Education could consider any of these methods to assess the effectiveness of other TRIO programs. Without assessing the programs that have never been evaluated or reviewed for overall effectiveness or the programs that have changed substantially since their most recent assessments, Education cannot determine the extent to which these TRIO programs are effectively serving participants.<sup>51</sup>

Education officials said they are in the early stages of planning future studies of the agency's various programs, but did not provide any documentation of this effort. Additionally, as of August 2020, they had not yet decided which topics to explore, if these studies would include assessments of the overall effectiveness of TRIO programs, or milestone dates for conducting any such studies.<sup>52</sup> Guidance from the Office of Management and Budget states that rigorous, independent program assessments can be a key resource in determining whether government programs are achieving their intended outcomes as well as possible and at the lowest possible cost.<sup>53</sup> Assessing those TRIO programs that have not been previously assessed for overall effectiveness as well as those that have experienced programmatic changes since they were last reviewed would provide Education information on whether participation in TRIO programs leads to better student outcomes. Leading practices for assessments state that agencies should require periodic assessments of programs throughout their life because, as programs change over time, assessing them periodically can provide ongoing feedback and insights about the programs' effectiveness.<sup>54</sup> In addition, standards for project

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<sup>50</sup>GAO, *Program Evaluation: A Variety of Rigorous Methods Can Help Identify Effective Interventions*, GAO-10-30 (Washington, D.C.: Nov. 23, 2009).

<sup>51</sup>In May 2019, a public policy research organization raised concerns about the extent to which Education has assessed TRIO outcomes. It recommended that Education, among other things, assess the effectiveness of TRIO programs.

<sup>52</sup>The Foundations for Evidence-Based Policymaking Act of 2018 provides Education an opportunity to plan future assessments of TRIO program effectiveness. Education is preparing to implement this act, which requires agencies to plan and organize agency-wide evidence-building activities by 2021. Education could leverage this agency-wide evidence-building effort to supplement the evidence it has on TRIO effectiveness. See Pub. L. No. 114-435, tit. I, 132 Stat. 5529, 5529-34 (2019) (codified at 5 U.S.C. §§ 311-315).

<sup>53</sup>Office of Management and Budget, *Increased Emphasis on Program Evaluations*, M-10-01 (Washington, D.C.: October 2009).

<sup>54</sup>American Evaluation Association, *An Evaluation Roadmap for a More Effective Government*, accessed July 23, 2020, <https://www.eval.org/evaluationroadmap>.

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management state that managing a project involves developing a plan with specific actions and milestone dates.<sup>55</sup> By developing such a plan for conducting future assessments of TRIO programs under its statutory authority, Education would be better positioned to assess the extent to which TRIO improves higher educational outcomes for disadvantaged students.

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## Conclusions

Higher education is an important pathway to economic opportunities. Congress has provided over \$1 billion annually for TRIO programs to support disadvantaged students in preparing for, applying to, and graduating from college. Although each TRIO program has performance metrics and goals, Education does not routinely take steps to verify the data grantees report. The integrity of these data are important because Education uses the information to track progress toward program goals and determine which applicants earn additional points based on past performance for the next grant competition. Additionally, gaps in Education's assessments of TRIO programs impede its ability to determine the programs' overall effectiveness. Taking additional steps to assess the reliability of grantees' performance data and the overall effectiveness of the TRIO programs would better position Education to determine the extent to which TRIO improves higher educational outcomes for disadvantaged students.

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## Recommendations for Executive Action

We are making the following two recommendations to Education:

The Assistant Secretary for the Office of Postsecondary Education should take additional steps to ensure the performance data TRIO grantees report are reliable. (Recommendation 1)

The Assistant Secretary for the Office of Postsecondary Education should develop a plan—with specific actions and milestone dates—for assessing the effectiveness of TRIO programs that serve students using methods that are consistent with its statutory authority. (Recommendation 2)

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## Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to the Department of Education. In its comments, reproduced in appendix I, Education concurred in part with our first recommendation and in full with

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<sup>55</sup>See Project Management Institute, Inc. A Guide to the Project Management Body of Knowledge (PMBOK® Guide), Sixth Edition (2017). PMBOK is a trademark of Project Management Institute, Inc.

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our second recommendation. Education also provided technical comments, which we incorporated as appropriate.

Regarding our first recommendation on performance information submitted by grantees, Education agreed that this information is important and the department has an interest in improving its reliability. Education also noted a number of steps it could take to better monitor the reliability of the different types of performance data grantees submit. For example, a number of the TRIO programs require grantees to collect and report student level information on postsecondary enrollment, persistence, and degree attainment outcome data that Education could cross-check against existing internal and external data systems. For other programs, Education is considering identifying other methods for verifying performance data, including monitoring TRIO grantees' programs and adding questions to grantees' required annual reports regarding their methodology for compiling student level data.

However, Education noted that it does not have access to underlying data sources that can independently verify certain data that grantees in some programs are required to submit, such as high school persistence, rigorous course enrollment, exposure to research opportunities, student grade point average, and secondary school completion. We recognize that Education may not have access to all of the underlying data. However, verifying information where possible is an important step toward improving oversight of grantees. In addition, as we stated in the report, Education could ask grantees to explain how they collect data and request related documentation. Education stated that it could require grantees to explain their methodology for compiling student level data. Such action could help identify data reliability concerns even in cases where independent verification is more difficult.

Education also noted that its ability to verify data submitted by grantees is dependent on the availability of appropriate funds for staffing. However, many of the steps the department identified to better monitor data reliability may not necessarily require additional staffing costs, such as leveraging the department's existing internal data or requiring grantees to document their methodology. Further, Education could consider other ways to limit costs, such as through a risk-based approach of monitoring a sample of grantees' performance data. Prioritizing staff resources toward oversight and monitoring is an essential component of program administration, particularly for programs like TRIO that rely on the results of prior performance to award future grants. Taking steps, such as those



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identified in its written comments, could help Education ensure the reliability of TRIO grantee performance data.

Regarding our second recommendation that Education develop a plan to evaluate programs, Education concurred and stated that it plans to evaluate TRIO programs using the most rigorous methods available given statutory limitations and will develop a plan with specific actions and milestone dates. Education also noted that it is mindful of the statutory limitations of the HEA, under which Education cannot require grantees to participate in an evaluation that requires TRIO grantees to recruit additional students beyond those the TRIO program or project would normally recruit or that results in the denial of services for an eligible student under the program or project. Education further stated that, upon further review of this prohibition, it concluded that the HEA does not universally prohibit the most rigorous evaluations that use a randomly assigned control group. Additionally, Education described the kinds of evaluations it could perform. We incorporated this information into the report, where appropriate.

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As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees and the Secretary of Education. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me at (617) 788-0534 or [emreyarrasm@gao.gov](mailto:emreyarrasm@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

Sincerely yours,

A handwritten signature in black ink that reads "Melissa Emrey-Arras". The signature is written in a cursive, flowing style.

Melissa Emrey-Arras, Director  
Education, Workforce, and Income Security Issues

# Appendix I: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

November 17, 2020

Ms. Melissa Emrey-Arras  
Director, Education, Workforce,  
and Income Security Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Emrey-Arras:

Thank you for providing the U.S. Department of Education (Education) with the U.S. Government Accountability Office's (GAO's) draft report titled, "Higher Education: Department of Education Should Further Assess College Access Grant Programs" (GAO-21-5; Job Code 103590). We appreciate GAO's audit work and the opportunity to comment on the draft report. In the responses that follow, we acknowledge administrative and statutory constraints that prevent Education from fully implementing the recommendations. Nonetheless, we agree that we can continue to improve Education's processes for ensuring grantees' performance data reliability, and we will continue to identify evaluation strategies that have the potential to improve outcomes in the Federal TRIO Programs (TRIO).

**Recommendation 1:** The Assistant Secretary for the Office of Postsecondary Education should take additional steps to ensure the performance data TRIO grantees report are reliable.

**Response:** Education concurs in part with the Recommendation. We agree to the extent that we are always interested in improving the reliability of the performance data and recognize its importance. To do this, there are a number of complexities that will need to be addressed. We will need to tailor how we examine data reliability based on a number of factors such as the type of grant, type of data collected, and instrument used to collect the data. For a number of the TRIO programs, such as the Student Support Services, Upward Bound/Upward Bound Math and Science, and Ronald E. McNair Postbaccalaureate Achievement programs, which collect and report student level information, Education can access internal and other external data that can be used to evaluate the reliability of reports submitted by TRIO grantees on postsecondary enrollment, persistence, and degree attainment outcome data. While other available data include both internal data such as the National Student Loan Data System (NSLDS) and external data such as the National Student Clearinghouse (NSC), such databases are not complete. The Talent

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**Appendix I: Comments from the Department of Education**

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Search TRIO program's reports of student rosters may offer an opportunity to perform similar data reliability reviews.

For TRIO programs not mentioned above, Education is considering identifying other statistically appropriate methods for verifying performance data including potentially conducting monitoring of TRIO grantees' programs. Education will consider a number of factors in selecting grantees to monitor.

Our ability to conduct this data verification is dependent on the availability of appropriate funds for staffing. In addition, Education will consider reviewing the TRIO programs' Annual Performance Report (APR) data collection instruments and, where appropriate, add questions regarding grant project methodology for compiling student level data. This information would help identify grantees with possible data reliability problems, although we believe it may be possible that implementing this data verification process change rigorously could require an increase to the current ½ of 1 percent cap on TRIO administrative expenses under 402A(g) of the Higher Education Act of 1965, as amended (HEA).

The possible practices mentioned above have limitations or challenges. Foremost, these steps focus on a small set of program outcomes. However, program regulations specify other outcomes of interest that would not be captured within the NSLDS or other data resources. For example, some grant programs are concerned with high school persistence, rigorous course enrollment, exposure to research opportunities, student grade point average, and secondary school completion. Grant projects report these outcomes (and others) for various TRIO grant programs. We do not have access to underlying data sources that can independently verify APR reporting for metrics related to these outcomes, but we will consider ways to further verify the data. While we concur in considering improvements, based on the factors cited above the results may be limited.

**Recommendation 2:** The Assistant Secretary for the Office of Postsecondary Education should develop a plan—with specific actions and milestone dates—for assessing the effectiveness of TRIO programs that serve students using methods that are consistent with its statutory authority.

**Response:** Education concurs with this Recommendation because it is based on the statutory requirement to “rigorously evaluate the effectiveness of the [TRIO] programs and projects” under section 402H of the HEA, codified at 20 U.S.C. § 1070a–18(b)(1)(A). Education also concurs with the recommendation to develop a plan with specific actions that comply with the statutory mandate and milestone dates for those actions.

Education is mindful of the statutory limitations in section 402H of the HEA, under which the Secretary cannot require grantees to participate in an evaluation that requires TRIO grantees to recruit additional students or that “results in the denial of services for an eligible student under the program or project.” However, upon further review of this prohibition, Education has concluded that it does not universally prohibit the most rigorous kinds of evaluations that use a randomly assigned control group.

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**Appendix I: Comments from the Department of Education**

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For example, in situations where the number of eligible applicants exceeds the number of funded slots for participating students, a TRIO grantee could allocate the available slots among the eligible applicants on a random basis; in such a situation, any “denial of services for an eligible student under the program or project” would be the result of the limitations on funding, not the result of the random selection. The effectiveness of the program or project could then be rigorously evaluated using a randomly selected control group, by comparing the students randomly selected to participate in the program with the students randomly selected to not participate in the program.

Likewise, Education interprets the statute to only prohibit an evaluation that results in a general “denial of services for an eligible student” under a TRIO program or project. As a result, an evaluation that randomly assigns some students in the program to receive a particular new practice as a treatment while assigning the rest of the students in the program to receive the same program services without that new practice—in order to rigorously evaluate the effectiveness of that practice to identify “particular practices that further the achievement of the outcome criteria” dictated by the TRIO statute, 20 U.S.C. § 1070a–18(b)(2)(B)—would not result in a general “denial of services” for any eligible student, and would therefore be allowed under the statute.

In 2021 and 2022, IES plans to conclude rigorous, random assignment evaluations of two promising practices, one in the Upward Bound program and the other in the Educational Opportunity Centers program. Neither study would result in the “denial of services” to an eligible student.

Of course, to the extent that in some instances the best methods of “rigorously evaluat[ing] the effectiveness of the [TRIO] programs and projects” are prohibited because they would result in “the denial of [TRIO] services” to one or more eligible students, Education will not conduct such analyses. Education will instead choose among the next most rigorous methods available to evaluate the effectiveness of the TRIO programs and projects at issue, while clearly stating the limitations of conclusions based on these less rigorous methods. Education continues to support the removal of the statutory limitations on evaluation, but will evaluate the TRIO programs as effectively as possible given statutory constraints.

Thank you for the opportunity to provide a written response to the draft GAO report. We encourage GAO to consider the information provided in this response when preparing its final report. As indicated, we will use the information in this report to improve our TRIO program performance data reliability, as well as continue to explore strategies to evaluate the TRIO programs in accordance with current statutory authority.

Sincerely,

**Robert King**

Digitally signed by Robert King  
Date: 2020.11.17  
11:00:33 -05'00'

Robert L. King  
Assistant Secretary  
Office of Postsecondary Education

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# Appendix II: GAO Contact and Staff Acknowledgments

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## GAO Contact

Melissa Emrey-Arras, (617) 788-0534 or [emreyarrasm@gao.gov](mailto:emreyarrasm@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Will Colvin (Assistant Director), Hedieh Fusfield (Analyst-in-Charge), Sarah Garcia, Kelsey Kreider, and Jon Muchin made key contributions to this report. Additional assistance was provided by Michelle Bacon, Valerie Caracelli, Gina Hoover, Tom James, Benjamin Licht, Sheila McCoy, Michael Naretta, Stacy Ouellette, Curtia Taylor, Adam Wendel, John Yee, and Christopher Zbrozek.

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