



441 G St. N.W.
Washington, DC 20548

February 15, 2023

The Honorable Margaret Wood Hassan
Chair
Subcommittee on Emerging Threats and Spending Oversight
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Robert P. Casey, Jr.
United States Senate

The Honorable Chris Van Hollen
United States Senate

DEPARTMENT OF EDUCATION: Additional Data Collection Would Help Assess the Performance of a Program Supporting College Students with Disabilities

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. While TRIO programs primarily serve low-income and first-generation college students, some of the programs also target individuals with disabilities and veterans.

Authorized under the Higher Education Act of 1965, as amended (HEA), TRIO is administered by the Department of Education’s Office of Postsecondary Education. TRIO provides over 3,000 competitive grants to organizations across all 50 states. Grantees are primarily postsecondary institutions such as colleges, but school districts and community organizations also receive these grants.

Research has shown that students with disabilities are less likely to complete a postsecondary education, and this lack of further education can have lifelong career and financial consequences.¹ You asked us to examine questions related to students with disabilities and TRIO. This report examines the extent to which Education has collected and reported information on students with disabilities served through TRIO.

To examine this topic, we reviewed Education’s most recent annual report for each TRIO program, as well as its reporting instructions to TRIO grantees. In addition, we interviewed officials from Education’s Office of Postsecondary Education as well as an organization representing TRIO grantees to understand Education’s data collection and performance reporting for TRIO.² We

¹*The Post-High School Outcomes of Young Adults With Disabilities up to 8 Years After High School, A Report from the National Longitudinal Transition Study-2 (NLTS2)*, NCSE 2011-3005 (Washington, D.C.: September 2011).

²The Council for Opportunity in Education is a nationwide nonprofit organization with an institutional membership of over 1,000 colleges and community agencies.

examined Education’s performance reporting under certain requirements in the HEA and assessed them against effective performance management practices we have identified in our prior work.

We conducted this performance audit from November 2021 to February 2023 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Background

The purpose of the TRIO programs is generally to promote achievement in postsecondary education among disadvantaged students. Seven of the eight TRIO programs serve students through grantees such as colleges, while the eighth is a training program for directors and staff of TRIO grants (see table 1). The seven TRIO programs that serve students directly generally require that at least two-thirds of those participating in a grantee’s project be low-income individuals who are or would be first-generation college students. While none of the TRIO programs focuses exclusively on students with disabilities, the HEA specifically states that part of the program design for the Student Support Services (SSS) program is to foster an institutional climate supportive of students with disabilities.

Table 1: Overview of Federal TRIO Programs

Program name	General program description ^a	Grant funding in fiscal year 2022 (\$ millions)
Upward Bound	College preparation for high school students	356
Student Support Services	Supports college students in completing their degree	351
Talent Search	High school completion and college enrollment assistance for individuals ages 11-27	184
Upward Bound Math and Science	Prepares high school students for college education programs and careers in math and science	72
Educational Opportunity Centers	College enrollment assistance for adult students	60
Ronald E. McNair Post-baccalaureate Achievement	Helps students prepare for graduate school	52
Veterans Upward Bound	Helps military veterans prepare for college	19
Training Program for Federal TRIO Programs	Provides professional development for TRIO grantee staff	3

Source: GAO analysis of Department of Education documents. | GAO-23-105551

^aThe TRIO programs that serve students generally require that at least two-thirds of those participating be low-income individuals that are or would be first-generation college students, in addition to serving certain other populations.

Two TRIO programs—SSS and Veterans Upward Bound (VUB)—have disability-related eligibility criteria. For SSS, the HEA states that at least two-thirds of participants in a grantee’s project must be individuals with disabilities, or low-income individuals who are first-generation college students.³ For VUB, having a disability is also one way to be eligible. Specifically, to participate in VUB a veteran must be low-income, first-generation in college, or have a high risk for academic failure. Program regulations define having a high risk for academic failure for veterans in three ways, one of which is having a disability.⁴

The HEA requires Education to report on the performance of TRIO programs. Although the HEA does not explicitly require Education to collect data on targeted demographic groups served by TRIO, the HEA requires Education to report annually on the performance of each TRIO program and provide separate information, as applicable, for targeted demographic groups, such as individuals with disabilities. To evaluate and report on program performance, Education collects data on degree completion and other educational outcomes for each TRIO participant. However, in December 2020, we reported that although Education collects data on educational outcomes for TRIO participants, the agency has gaps in its evidence on program effectiveness. We recommended that the agency develop a plan for assessing the effectiveness of TRIO programs that serve students.⁵ Education agreed and is exploring options for improving its performance assessment of TRIO programs.

For the six TRIO programs that do not have disability-related eligibility criteria, Education does not collect information on whether participants have a disability. As noted above, the HEA does not explicitly require Education to collect such data.

Focusing on the two TRIO programs with disability-related eligibility criteria, we found:

- **Education collects information on the disability status of each VUB participant but does not for SSS participants.**
 - For VUB, Education collects information on the disability status of each participant. In 2020, Education reported that about half of the approximately 6,300 VUB participants had a disability in 2016-17, the most recent year reported for that program.
 - For SSS, Education does not collect information on each participant’s disability status, despite evidence that grantees collect this information. Instead, Education collects data from SSS grantees about whether participants meet one of several possible eligibility criteria. Specifically, the criteria are: (1) low-income only; (2) first-generation only; (3) low-income and first-generation; (4) disabled; or (5) disabled and low-income. These data yield incomplete information on SSS participants with disabilities because they could be counted as low-income, first-generation, or both, instead of as disabled. According to Education, in

³The HEA also requires the remaining portion (one-third or less) of participants be low-income individuals, first-generation college students, or individuals with disabilities. In addition, at least one-third of the participants with disabilities in an SSS grantee’s project must also be low-income individuals.

⁴The other ways veterans are considered as having a high risk for academic failure are (1) being out of high school or dropped out of a program of postsecondary education for 5 or more years, or (2) having standardized test scores below a level that demonstrates a likelihood of success in a postsecondary education program.

⁵GAO, *Higher Education: Department of Education Should Further Assess College Access Grant Programs*, [GAO-21-5](#) (Washington, D.C.: Dec. 17, 2020).

2020-21, the most recent year available, over 23,000 students—or about 12 percent of all SSS participants—were eligible by being disabled or being disabled and low-income. Thus, at least that many students with disabilities participated that year, but the precise number could be higher and is unknown.

- **Education periodically reports on the performance of VUB and SSS, but does not include performance information for SSS participants with disabilities.** For example, Education last reported on VUB in 2020 and on SSS in 2016 and 2019. The VUB report included disaggregated performance information for participants with a disability; however, the SSS reports did not include separate performance information for participants with disabilities.
- **Education cited reasons for not collecting data on the disability status of SSS participants, but not capturing this information has consequences.** For example, Education officials cited concerns about increasing the workload of SSS grantees who submit data on potentially hundreds of participants. However, according to representatives of TRIO grantees, SSS grantees already collect information from students about each participant's disability status, as well as other demographic information such as gender and race. Education officials also questioned the usefulness of the agency collecting these data because comparable data on outcomes for students with disabilities may not exist. However, Education could consider the performance of SSS participants with disabilities in various ways. For example, the agency could compare the group's outcomes over time, or with the outcomes of SSS participants without disabilities as Education did for VUB in 2020.⁶ As a result of not collecting data on each SSS participant's disability status, Education cannot fully evaluate and report on the program's performance for this population.
- **HEA requires, and best practices underpin the need for, reporting on SSS for participants with disabilities.** The HEA requires Education to report annually to Congress on the performance of TRIO programs, including SSS, focusing on relevant outcome criteria. Such outcome criteria must be disaggregated by, among other groups, individuals with disabilities. Thus, the HEA requires Education to report to Congress on SSS performance using outcome criteria disaggregated by individuals with disabilities. Furthermore, we have reported that to be useful, performance information must meet users' needs for completeness and validity, among other attributes. As an example, we reported that disaggregating performance information can help managers focus on areas of concern.⁷

Conclusions

SSS, one of the largest TRIO programs, has disability-related eligibility criteria. However, Education does not collect information on the disability status of each SSS participant. In response to our prior recommendation regarding evaluating the effectiveness of TRIO programs that serve students, the agency is exploring options for improving its performance assessment of these programs. As it does, Education has the opportunity to address the data needs for these assessments. Without collecting information on which SSS participants have a disability, Education

⁶U.S. Department of Education, Office of Postsecondary Education, Student Service, *Fast Facts Report for the Veterans Upward Bound Program* (Washington, D.C.: August 2020).

⁷GAO, *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, [GAO-05-927](#) (Washington, D.C.: Sept. 9, 2005).

cannot fully assess SSS's performance for individuals with disabilities, and any eventual plan to evaluate and report on the performance of TRIO programs will be incomplete.

Recommendation for Executive Action

Education's Assistant Secretary for Postsecondary Education should collect data from SSS grantees on each participant's disability status and use this information to report on program performance for participants with disabilities. (Recommendation 1)

Agency Comments

We provided a draft of this report to the Department of Education for review and comment. In its comments, reproduced in enclosure I, Education concurred with our recommendation. Education described its plans to collect data from SSS grantees on participants' disability status and to use this information to report on program performance for participants with disabilities. Education also provided technical comments, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 2 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff members have any questions about this report, please contact me at (202) 512-7215 or curdae@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report were Erin Godtland (Assistant Director), Joel Green (Analyst-in-Charge), Will Colvin, Jennifer Cook, Hedieh Fusfield, Alex Galuten, Gina Hoover, and Jessica Orr.



Elizabeth H. Curda
Director, Education, Workforce, and Income Security Issues

Enclosure - 1

Enclosure I: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202

January 20, 2023

Ms. Elizabeth Curda
Director, Education, Workforce,
and Income Security Issues
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Curda:

Thank you for providing the U.S. Department of Education (Department) with a draft copy of the U.S. Government Accountability Office's (GAO's) report titled, "Department of Education: Additional Data Collection Would Help Assess the Performance of a Program Supporting College Students with Disabilities, GAO-23-105551."

We appreciate the hard work that went into the audit of the Student Support Services (SSS) program, which is one of eight Federal TRIO programs to improve access and success of disadvantaged students preparing for, enrolling in, and graduating from college. As noted by GAO, the TRIO programs serve students who are low-income and would be first generation college students.

We also appreciate the opportunity to comment on the draft GAO report and are providing our technical comments in the attachment.

Recommendation 1: Education's Assistant Secretary for Postsecondary Education should collect data from SSS grantees on each participant's disability status and use this information to report on program performance for participants with disabilities.

Response: The Department's Office of Postsecondary Education (OPE) concurs with this recommendation. OPE will revise the Student Support Services (SSS) Annual Performance Report (APR) to include a question that explicitly asks about student disability status to collect the data from SSS grantees on participants' disability status. OPE will submit this proposed APR revision to the Office of Management and Budget (OMB) as part of the notice-and-comment process under the Information Collection Request (ICR) approval process in accordance with the Paperwork Reduction Act (PRA), 44 U.S.C. § 3501 et seq.

OPE anticipates that this proposed APR revision will result in the collection of information that can be used to report on program performance for participants with disabilities in the SSS programs.

OPE plans to also build a section into the annual SSS Government Performance and Results Act (GPRA) Report in which program performance for participants with disabilities will be presented.

Sincerely,

**NASSER
PAYDAR**  Digitally signed by
NASSER PAYDAR
Date: 2023.01.21
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Nasser H. Paydar
Assistant Secretary for Postsecondary Education

Attachment

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