

CRS Report for Congress

Trio and GEAR UP Programs: Status and Issues

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Summary

The Higher Education Act (HEA) is the source of over \$52 billion in federally supported grant, loan, and work-study assistance to help meet the costs of postsecondary education. The HEA also supports several programs that complement this student aid by providing services and incentives to disadvantaged students to help increase their secondary or postsecondary educational attainment. Foremost among these programs are the federal Trio programs and the Gaining Early Awareness and Readiness for Undergraduate Program (GEAR UP).

Each program is administered by the U.S. Department of Education and support many similar activities and objectives. Trio is primarily intended for individuals who are low-income, first-generation college students, or are disabled — the precise population differs among the various programs. GEAR UP directs its support to individuals from low-income elementary and secondary schools. The goal of both programs is to increase disadvantaged students' high school completion and enrollment in higher education by providing a variety of academic, counseling, and college preparatory services. GEAR UP includes a scholarship component, while Trio provides financial aid counseling and work-study employment.

It is likely that the 110th Congress will consider reauthorizing the HEA. Given that increasing access to higher education has been a primary goal of the HEA, whether these and other HEA programs adequately promote this objective will be a central issue as Congress considers reauthorization. Other possible topics of concern are program consolidation and coordination, overall authorization levels, amounts for student grants and scholarships, the nature of program services, the status of program evaluations and the definition of eligible students and campuses.

This report will be updated as legislative action occurs.

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Trio and GEAR UP Programs: Status and Issues

Introduction

The Higher Education Act (HEA) is the source of over \$52 billion in federally supported grant, loan, and work-study assistance to help meet the costs of postsecondary education. The HEA also supports several programs that complement this student aid by providing services and incentives to students to help increase their secondary or postsecondary educational attainment. These programs are premised on the belief that although addressing financial barriers to postsecondary enrollment is necessary, it is not sufficient for many students, particularly those from disadvantaged backgrounds. Foremost among these programs are the federal Trio programs and the Gaining Early Awareness and Readiness for Undergraduate Program (GEAR UP).

The statutory authorities in the HEA expired at the end of FY2004; however, they have been recently extended and currently remain effective.¹ As with the rest of the HEA, Trio and GEAR UP may be considered for reauthorization by the 110th Congress. This report is intended to provide an overview of Title VI programs, and an analysis of reauthorization issues.

Program Overview

The Trio programs trace their roots to the Johnson Administration's Great Society. The first program, Talent Search, was authorized with the initial passage of the HEA in 1965 and two others, Upward Bound and Student Support Services, were added in 1968.² Even though several additional programs have been included over the years, they are by law called the Trio programs. A relatively new program that is not part of the Trio array of programs, GEAR UP, was added to HEA by the Higher Education Amendments of 1998. Trio and GEAR UP are currently authorized by HEA Title IV, Part A, Subpart 2, Chapters 1 and 2 respectively.

Both sets of programs are administered by the U.S. Department of Education (ED) and support many similar activities and objectives. Trio programs are primarily intended for individuals who are low-income, first-generation college students, or are

¹ The most recent extension of these authorities goes through July 31, 2007 under the First Higher Education Extension Act of 2007 (P.L. 110-44).

² Upward Bound was originally created through the Economic Opportunity Act of 1964 and transferred to the Office of Education in 1968.

disabled — the precise population differs among the various programs. GEAR UP directs its support to individuals from low-income elementary and secondary schools. The goal of both programs is to increase disadvantaged students' secondary school completion and postsecondary enrollment by providing a variety of academic, counseling, and college preparatory services. GEAR UP includes a scholarship component, while Trio provides financial aid counseling and work-study employment.

Trio Programs

At the present time, there are five Trio programs that provide direct service to students and two that provide indirect support. The five primary programs are Talent Search (TS), Upward Bound (UB), Student Support Services (SSS), Ronald E. McNair Postbaccalaureate Achievement (MPA), and Educational Opportunity Centers (EOC). These programs provide grants of four and five years in duration and are awarded competitively to institutions of higher education and other public and private institutions and agencies. Projects supported by these grants must predominantly consist of participants who are from low-income families and are first-generation college students. The appropriation for the Trio programs was \$828.2 million in FY2006 and FY2007.³

In selecting grantees, the Secretary of Education is expected to consider an applicant's prior experience in delivering services under the Trio programs and to encourage coordination of each Trio project with any programs for disadvantaged students operated by a grantee. A Trio project director is permitted to administer other programs for disadvantaged students operated by the grantee. In addition, Trio funding provides indirect support for staff training, dissemination of best practices, evaluation activities, and administrative expenses.

Talent Search. This program is intended to encourage youth with college potential to complete high school and enter postsecondary education; to encourage dropouts to reenter education; and to disseminate information about available postsecondary student assistance. At least two-thirds of each project's participants must be low-income individuals who would be first-generation college students. Participants must have completed a minimum of five years of elementary education, or be 11 to 27 years of age. (Age limits in any Trio program can be waived if they would prevent a project from achieving program purposes.)

Among services provided by TS projects are: assistance in completing college admissions and financial aid applications, and preparing for college entrance exams; guidance and assistance to individuals for reentering secondary school or entering general educational development (GED) programs; personal and career counseling; tutoring; exposure to college campuses, cultural events, and academic programs; assistance in secondary school and college course selection; workshops and counseling for participants' families; and mentoring programs.

³ U.S. Department of Education, Budget Office, January 4, 2006.

Upward Bound. UB projects are intended to provide precollege students and veterans with the skills and motivation needed to succeed in postsecondary education. At least two-thirds of project participants must be low-income students who would be first-generation college goers; the remainder must be either low-income or prospective first-generation college goers. Participants must have completed at least eight years of elementary education, and be 13 to 19 years of age.

Among allowable UB services are the following: instruction in math, lab science, foreign language, composition, and literature (required of projects that have received two or more years of assistance); counseling and workshops; tutoring; mentoring; exposure to cultural events; activities acquainting participants with career options; work-study positions exposing participants to careers requiring postsecondary education; and residential programs on college campuses. Most UB projects provide six-week summer programs on college campuses. Participants may receive monthly stipends of up to \$60 during the summer (work-study students may receive monthly stipends of \$300 in the summer) and \$40 during the rest of the year. ED also funds Upward Bound Math and Science Centers (UBMS) providing intensive instruction in math and science.

Student Support Services. SSS projects are intended to improve college students' retention and graduation rates, and improve the transfer rates of students from two-year to four-year colleges. Program regulations limit eligible grantees to postsecondary education institutions. At least two-thirds of SSS participants in any project must be either disabled individuals or low-income, first-generation college goers. The remaining participants must be low-income, or first-generation college goers, or disabled. Not less than one-third of the disabled participants must be low-income as well.

SSS projects may provide such services as: instruction in reading, writing, study skills, math, and other subjects; academic counseling; exposure to cultural events, academic programs, and career options; assistance in the graduate admission and financial aid processes; assistance in transferring from two-year to four-year colleges; and mentoring. In selecting grantees, the Secretary must consider an institution's efforts to provide participants with aid sufficient to meet full financial need and to constrain student debt.

Ronald E. McNair Postbaccalaureate Achievement. MPA projects seek to prepare disadvantaged students for doctoral study. Program regulations limit eligible grantees to postsecondary education institutions. At least two-thirds of participants must be low-income, first-generation college goers; the remainder must be from groups underrepresented in graduate education.

Among the services that may be provided are: research opportunities, seminars, and other activities preparing students for doctoral study; summer internships; tutoring; academic counseling; assistance in securing graduate admission and financial aid; mentoring; and exposure to cultural events and academic programs. Research participants may receive an annual award providing a stipend of up to \$2,800; the award may cover the costs of summer tuition, room and board, and transportation as well.

Educational Opportunity Centers. This program is intended to provide information to prospective postsecondary students regarding available financial aid and academic assistance, and help them apply for admission and financial aid. At least two-thirds of participants in any project must be low-income students who would be first-generation college goers. They must also be at least 19 years old.

EOCs may provide: information to communities about postsecondary education and training opportunities; assistance in completing admission and financial aid applications; assistance preparing for college entrance exams; guidance on reentering secondary school, or entering a GED program or other program for high school dropouts; personal counseling; tutoring; career workshops; and mentoring.

Indirect Support. The *Staff Development* program supports training of current and prospective Trio staff. Grants can be made to postsecondary education institutions, and public and private nonprofit entities. Among authorized activities are conferences, internships, seminars, workshops, and publication of training manuals. Annually, one or more of the projects must train new Trio project directors, and must address the following: legislative and regulatory requirements for operating Trio projects, guidance on assisting students in receiving adequate amounts of student aid, the design and operation of model Trio projects, and the use of educational technology in operating Trio projects.

Dissemination Partnership Grants are provided to Trio projects that were funded prior to the HEA Amendments of 1998 to expand and leverage the success of these projects. Funds are used to support partnerships with other institutions of higher education or community-based organizations that are not receiving Trio funds but that are serving low-income and first-generation college students. Services include disseminating and replicating best practices and providing technical assistance to other non-Trio programs and projects.

Funding is also provided for *administrative expenses and program evaluation*. Up to 0.5% of the funds appropriated for Trio may be used by ED to support administrative activities that include obtaining additional qualified readers and additional staff to review applications; increasing the level of oversight monitoring; supporting impact studies, program assessments and reviews; and providing technical assistance to potential applicants and grantees. Required evaluation activities include identifying effective practices, documenting student preparation for college, documenting student success in college, and identifying the effectiveness of alternative and innovative methods within Trio programs.

GEAR UP

The GEAR UP program was added to HEA Title IV by the Higher Education Amendments of 1998.⁴ GEAR UP seeks to increase disadvantaged students' secondary school completion and postsecondary enrollment by providing support services and by assuring students of the availability of financial aid to meet college costs. The appropriation for GEAR UP was \$303.4 million in FY2006 and FY2007.⁵

Eligible Entities. States or partnerships are eligible for funding. A partnership must consist of: (1) one or more school districts acting on behalf of one or more elementary or secondary schools; (2) one or more postsecondary education institutions; and (3) at least two other entities, such as community organizations, state agencies, or other public or private agencies. Of the amount remaining after funding continuations are distributed for previous awards, at least 33% is for states, at least 33% is for partnerships, and the remainder is awarded to either states or partnerships. The allocation of the remainder between states and partnerships is to be reevaluated annually. Participating entities must provide from non-federal funds at least 50% of the cost of the program. Partnerships' matching level can be modified through regulation.

Early Intervention Activities. Any funded state or partnership must provide comprehensive mentoring, counseling, outreach, and support services to participating students. This counseling must address financial aid, college applications, and admissions, and must foster parental involvement in the college preparation process. Projects may provide a system of mentoring and advising; require students to enter into agreements to achieve specific academic milestones in exchange for tuition assistance; provide services to ensure high school completion and college enrollment of at-risk individuals; provide summer programs for high school sophomores or juniors or students planning on going to college in the coming academic year; and require students to meet other standards.

Participating states are required to make low-income students a priority for services. Partnerships are required to provide services to at least one grade level of students (beginning by the seventh grade) in a school with a seventh grade and with an enrollment at least half of which is eligible for free or reduced-price lunches. Alternatively, services can be provided to students in a particular grade (beginning by the seventh grade) who reside in public housing. Partnerships must ensure that services are provided to each such cohort of students through the twelfth grade. They must coordinate services with existing early intervention programs and not duplicate available services.

Scholarships. Participating states are *required* to establish or maintain a postsecondary scholarship program for participants; partnerships are *permitted* to

⁴ State-level components of GEAR UP reflect the prior National Early Intervention Scholarship and Partnership program established by the Higher Education Amendments of 1992 (P.L. 102-325) and first funded in FY1994.

⁵ U.S. Department of Education, Budget Office, January 4, 2006.

include a scholarship component. The minimum amount of these scholarships is the lesser of 75% of the annual average cost of attendance for an in-state student in a four-year program at public higher education institutions in the state, or the maximum Pell Grant for that fiscal year (the program statute provides that the total amount of HEA, Title IV aid cannot exceed a student's cost of attendance).

To be eligible to receive the initial scholarship, a student must be less than 22 years old; have received a high school diploma or equivalent on or after January 1, 1993; be enrolled or accepted for enrollment in an undergraduate program at an institution located in the state (at a state's option, the GEAR UP scholarship can be made portable); and have participated in the GEAR UP early intervention component (at the participating entity's option, Trio participation can qualify a student). Current Pell Grant recipients must receive priority in the awarding of scholarships. Each state must use at least 25% of its funds but not more than 50% for early intervention. This rule also applies to partnerships that conduct a scholarship component. The 50% cap can be waived if the participant has another way of providing the scholarship assistance.

Additional Activities. The Secretary is to provide 21st Century Scholar Certificates to GEAR UP students and may, as practicable, provide them to all students in grades 6-12 in schools where at least 50% of the enrollment qualifies for free or reduced-price lunches. These certificates are to be personalized for each student and indicate the amount of federal postsecondary financial aid the student may be eligible to receive.

Each participating state or partnership must ensure that its activities are coordinated with, complement, and enhance other GEAR UP services in the same district or state, and services under other federal or non-federal programs. Biennially, each entity receiving GEAR UP funds must submit an evaluation of its activities to the Secretary. The Secretary, with up to 0.75% of the annual appropriation, is required to fund evaluations of the effectiveness of the program; the Secretary must report, biennially, to the U.S. Congress on GEAR UP evaluations.

Appropriations History and Population Served

As mentioned above, in FY2006, Trio was funded at \$828.2 million, and GEAR UP is funded at \$303.4 million. During that fiscal year, Trio programs served over 876,000 students and GEAR UP served 709,000.⁶ **Table 1** presents statistics on the recent history of Trio and GEAR UP appropriations, grants awarded, and population served.

⁶ U.S. Department of Education, *Fiscal Year 2006, Justifications for Appropriation Estimates to the Congress*, vol. 2.

Table 1. History of GEAR UP Appropriations, Grants Awarded, and Students Served

FY	Trio			GEAR UP			
	Appropriation (000s)	Grants	Students served	Appropriation (000s)	State grants	Partnership grants	Students served
2006	\$828,178	2,676	876,341	\$303,423	39	166	709,000
2005	836,543	2,705	877,777	306,488	36	209	723,933
2004	832,559	2,690	868,969	298,230	36	274	1,484,477
2003	827,089	2,726	864,302	294,152	36	280	1,440,111
2002	802,500	2,646	872,032	285,000	36	288	1,238,306
2001	730,000	2,489	747,917	295,000	30	243	971,606
2000	645,000	2,352	724,845	200,000	26	239	766,829
1999	600,000	2,321	722,477	120,000	21	164	448,263

Source: U.S. Department of Education, *Justifications for Appropriation Estimates to the Congress*, vol. 2, various years.

Table 2 compares the number and characteristics of students enrolled in high school and college to the participants in Trio and GEAR UP programs. The number of participants counted under each program simply refers to the number receiving any amount of services which in some cases may be as little as a single visit with a counselor. Program participants are more likely to be female, black and Hispanic than the overall student population.

Table 2. Characteristics of High School and College Students Compared with Participants in Trio and GEAR UP Programs

Characteristic	H.S. ^a	College ^a	UB ^b	SSS ^c	TS ^c	EOC ^c	MPA ^c	GEAR UP ^d
Students (1,000s) ^e	15800	15300	63	200	321	161	4	971
Female	49%	56%	70%	65%	60%	64%	65%	n.a.
White, non-Hispanic	65%	70%	21%	46%	32%	41%	23%	26%
Black, non-Hispanic	15%	14%	50%	29%	35%	36%	40%	30%
Hispanic	14%	9%	22%	15%	22%	14%	26%	36%
Other, non-Hispanic	5%	7%	7%	10%	11%	9%	11%	8%

- Counts and demographic data for high school (grades 9 through 12) and college students (undergraduate and graduate students) are CRS estimates of those enrolled during October 2000, Current Population Survey, U.S. Census Bureau.
- The most recent data on the demographic characteristics UB participants is for 1992-1994, from *The Short-term Impact of Upward Bound: An Interim Report*, U.S. Department of Education.
- Demographic data for SSS are 1997-1998 participants and for TS, EOC and MPA are 1998-1999 participants, and are taken from various Trio *Profiles* reports, U.S. Department of Education.
- Demographic data on participants in GEAR UP are 2000-2001 participants, and are taken from the *Annual Performance Report*, U.S. Department of Education.
- Student counts for Trio and GEAR UP participants are for FY2001, and are taken from the 2003 *Justifications*, U.S. Department of Education.

Program Evaluations

Each of the major Trio programs as well as GEAR UP are currently under evaluation by ED in collaboration with independent contractors. Preliminary results from these studies are only available for three programs — SSS, UB, and GEAR UP. However, these preliminary results provide some evidence on program effectiveness and serve as a good entry-point for consideration of reauthorization issues.

Student Support Services. A longitudinal evaluation of SSS has been ongoing since 1991. The first report to come out of this evaluation simply describes the participating students.⁷ A second discusses best practices and services offered.⁸ The most common services provided by SSS programs operating between 1991 and 1994 were academic counseling and peer tutoring.

A third report, generated after the third year of this evaluation, revealed a small but positive and statistically significant effect on measures of student outcomes including grades in college, total number of credits earned, and retention in higher education.⁹ During their first year, SSS participants' GPA increased by an average of 0.15 compared to a control group of non-participants, credits earned increased by 1.25, and retention increased by 7 percentage points. The small size of these effects was attributed to the fact that, at such an early stage of the evaluation, most students had only a modest amount of services provided.

Importantly, the third year report indicates that students who were more disadvantaged tended to experience greater positive effects as a result of greater SSS participation. That is, these students tended to have a greater amount of services provided and consequently showed more benefits from program participation.

The six-year evaluation report, originally scheduled for release in February 2002, is currently under ED review. According to the *2004 Justifications*, the results of this program evaluation will show substantial impacts across a wide range of outcomes; most importantly, a 9 percentage point increase in the rate of college graduation compared to a control group of non-participants. SSS also continues to produce positive results on credits earned, grade point average, and retention. The newer report looked at transfer rates and found a positive impact of SSS on transfer from two-year to four-year colleges.

⁷ U.S. Department of Education, *National Evaluation of Student Support Services: Analysis and Highlights from Reports on Program Implementation, Interim Report, Volume I*, 1994.

⁸ U.S. Department of Education, *Best Practices in Student Support Services: A Study of Five Exemplary Sites*, August 1997.

⁹ U.S. Department of Education, *National Study of Student Support Services: Third Year Longitudinal Study Results*, February 1997.

Upward Bound. A longitudinal evaluation of UB has been underway since 1993. A report on phase one of the project was released in 1999 and the results of a second phase are pending.¹⁰ The findings available so far indicate that, across all participants, UB has no overall impact beyond encouraging students to choose four-year over year-year schools. Also, nearly half of UB participants drop out of the program before completing high school — resulting in an average length of exposure of 19 months.

Conversely, the study found that UB has a large positive impact on the subgroup of students with low income, lower educational expectations, and serious academic problems. This positive impact was manifested in a variety of educational outcomes — most notably, high school completion rates. This important exception to the overall finding of this evaluation is also in line with the results of the SSS evaluation — that is, UB appears to have its greatest impact on the most disadvantaged students who participate.

GEAR UP. A longitudinal evaluation of GEAR UP has begun following the cohort of students who began seventh grade in the 2000-2001 school year. The first report released in 2003 discusses the design of the study and program implementation issues. Twenty partnerships were selected for the evaluation and were matched with a non-GEAR UP school in the same school district for comparison purposes. The study also makes use of data from annual performance reports.

The report describes the characteristics of the participating students (overwhelmingly non-White) and schools (67% free or reduced-priced lunch eligibility) as well as a “markedly” improved “climate” in the schools (i.e., the general attitude toward GEAR UP) between the initial and subsequent site visits. Implementation issues discussed in the report include heavy reliance on project staff due to difficulty in getting parents and volunteers involved in the program.

Reauthorization Issues

Given that increasing access to postsecondary education has been a primary goal of the HEA, whether these and other HEA programs adequately promote this objective will be a central issue during the reauthorization process. This section addresses several prominent aspects of Trio and GEAR UP as they pertain to access and other issues and discusses relevant legislation that has been introduced to date.

Coordination. As the number of Trio programs has grown and GEAR UP was enacted, a debate has developed around issues of program coordination and consolidation. The focus of this debate can be framed by the following two questions: (1) to what extent do the similar objectives of the various programs produce overlap and duplication of effort, and (2) to what extent do the distinct

¹⁰ U.S. Department of Education, *The Impacts of Upward Bound: Final Report for Phase I of the National Evaluation*, April 1999. The results of phase two were due to be released in March of 2002 and are currently under ED review.

activities of these programs produce a disjointed set of services that should be coordinated to support students at all points in their academic career.

As has been described, GEAR UP seeks to address the problems of high school completion and college access for disadvantaged students through a *holistic* approach. Should this approach be replicated through the array of Trio programs? Arguably, one of the strengths of GEAR UP is that it “sticks with” the same cohort of students from start to finish. Trio might be criticized for the way in which the various programs lack coordination, and therefore follow-up, for students at risk of terminating their education at any point.

On the other hand, focusing on a single cohort limits the ability of these programs to adequately and individually serve large numbers of students. Moreover, providing services to a group of students who enter seventh grade at a particular school in one particular year and not providing the same services to those entering seventh grade at the same school in the following year may raise concerns about fairness and efficiency. Although there is some evidence that some GEAR UP programs “back fill” by taking in students in subsequent cohorts, there is no requirement to do so.

Trio advocates, like the Council for Opportunity in Education (COE), push for two steps in program coordination: (1) TS should be re-focused to serve only high school students, and GEAR UP should be re-focused to serve middle school students, and (2) GEAR UP be consolidated as one of the Trio programs.¹¹ COE argues that this would eliminate duplication between the two programs because under the current structure they serve similar populations and have similar objectives.

It has also been suggested by COE and other observers that program continuity could be improved by better ensuring continuity from grant to grant by placing greater weight on prior experience, extending the length of grants, and adjusting minimum grant amounts for inflation and cost increases.

Funding. Several funding issues are likely to be raised during the reauthorization process. Three general areas of concern are the overall funding authorization, the mechanisms for awarding and distributing grants, and the aid offered to students. In a recent hearing held by the House Committee on Education and the Workforce, a panelist suggested that Trio and GEAR UP funding amounts be determined as a formula-based proportion of federal student aid appropriations.¹² Pegging Trio and GEAR UP funding to federal aid would help ensure that low-income students’ non-financial issues are addressed to the same degree as their financial needs. But, in fact, in the last decade Trio appropriations have remained a relatively stable percentage (7.3%) of appropriations for federal need-based grants (i.e., Pell Grants and Supplemental Educational Opportunity Grants).

¹¹ Council for Opportunity in Education, *Policy Options Regarding Trio for the Upcoming Reauthorization of the Higher Education Act of 1965*, January 22, 2002.

¹² Testimony of Lawrence Gladieux, an independent education and public policy consultant, to the House Committee on Education and the Workforce, July 16, 2002.

The importance of prior experience as a factor in the Trio grant award process has long been a matter of disagreement. Some feel that past success in winning grants should positively influence the likelihood of continued awards because it provides for the kind of continuity discussed in the previous section. Others assert that, given the limited number of grants relative to the vast number of students in need of services, competitions should be more open to those without prior experience. Further disagreement exists over other priorities expressed in the funding mechanism — most notably, whether preference should be given to certain racial/ethnic groups or geographic areas.

Trio offers little in the way of direct monetary aid to students and some assert that the stipends offered are inadequate. COE argues that UB stipends be increased to \$60 per month during the school year and \$100 per month during the summer. COE also advocates for raising the maximum allowable stipend for summer research under MPA. GEAR UP scholarships offer much more substantial funds for students who attend college. However, financial aid administrators object to statutory language requiring that these scholarships “supplement, not supplant” regular need-based aid.¹³ In recent regulations, ED specified conditions under which colleges and universities may be exempt from this requirement.¹⁴ Stipend amounts and regulations aside, these concerns raise a larger question about the intent of these programs. Namely, should the financial aid component of these programs be expanded thereby linking aid to a broader program of college preparation or should the financial aspect of access to postsecondary education remain the purview of traditional sources of monetary assistance?

Services. The *non-academic* services provided by these programs have come under attack in recent years; the counseling services component of Upward Bound is a good example.¹⁵ Those in the current Administration focused on program performance (as defined by specific outcome measures) see these services as “ineffective.”¹⁶ Since one of the goals of UB is to improve college completion rates among first-generation and low-income students, the preliminary “no impact” program evaluation results referred to earlier may be viewed as damaging.

At the same time, others argue that non-academic services (such as those that improve self-esteem) have been a part of Trio programs since their inception and go to the heart of their intended purpose. In this light, the evaluation result that UB encourages would-be two-year students to attend four-year schools is a notable accomplishment. Nonetheless, reauthorization debate over the academic and non-academic priorities of the Trio and GEAR UP programs seems likely. One possible outcome might be to narrow the large array of services currently allowable.

¹³ HEA, Title IV, Section 404E.

¹⁴ 65 *Federal Register* 39814 (June 28, 2000).

¹⁵ Richard Morgan, “Upward Bound’s Slippery Slope,” *Chronicle of Higher Education*, May 3, 2002.

¹⁶ U.S. Department of Education, *Fiscal Year 2004, Justifications for Appropriation Estimates to the Congress*, vol. 2.

Evaluations. In response to the Administration’s negative interpretation of the UB evaluation, Trio advocates also caution against drawing premature conclusions about college completion from an unfinished longitudinal study. While the preliminary results from the evaluation of SSS are more positive, the lack of recent evaluations of other Trio programs may itself become a reauthorization issue.

Definitions. Through the 1992 amendments, institutions or agencies were permitted to submit more than one Trio application “if the additional applications describe programs serving different populations or campuses”.¹⁷ Some assert that subsequent ED regulations defined *different populations* and *different campuses* too narrowly and thereby undermined congressional intent to provide services to disadvantaged students.

Another problem with Trio eligibility arises from the definition of a “low-income individual” in Section 402A. Current language stipulates that such an individual come “from a family whose taxable income for the *preceding year* did not exceed 150 percent of an amount equal to the poverty level.” COE argues that this unfairly excludes students who would be classified as low-income based on *current income*, but not on the previous year’s income. Their proposed solution to this problem is to give Trio Directors the discretion to consider eligibility and documentation on a case-by-case basis, similar to the discretion provided financial aid administrators.

However, the evaluation results discussed above indicate that a loosening of the definition of low-income students may weaken program outcomes. The preliminary findings from the UB and SSS evaluations suggest that these programs have the greatest impact on those most disadvantaged — that is, students with lower income, greater academic problems, and lower educational expectations. Thus, Trio and GEAR UP programs may be improved by tightening, not loosening, eligibility definitions to focus on those most in need of services and assistance.

¹⁷ HEA, Title IV, Section 402A.