May 28, 2024

Jennifer Engle
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

RE: Docket ID ED-2024-OUS-0014

Dear Dr. Engle,

The Association of Public and Land-grant Universities (APLU) appreciates the opportunity to contribute feedback in response to the Department of Education’s Request for Information (RFI) on a Postsecondary Student Success Recognition Program. For public universities, student success is not merely a goal; it is a profound commitment to nurturing the potential of each individual student, unlocking doors to transformative opportunities, and fostering a generation empowered to contribute thoughtfully and effectively to our nation’s workforce and society. The importance of student success can be seen in nearly every measure comparing outcomes of degree completers to non-completers, including employment outcomes and loan repayment rates. Public universities are deeply committed to providing all students pathways to academic and career success.

APLU is a membership organization that fosters a community of university leaders collectively working to advance the mission of public research universities. The association’s U.S membership consists of more than 230 public research universities, land-grant institutions, state university systems, and affiliated organizations spanning across all 50 states, the District of Columbia, and six U.S. territories. The association and its members collectively focus on increasing access, equity, completion, and workforce readiness; promoting pathbreaking scientific research; and bolstering economic and community engagement. Annually, its U.S. member campuses enroll 4.3 million undergraduates and 1.3 million graduate students, award 1.25 million degrees, employ 1.2 million faculty and staff, and conduct $58 billion in university-based research.

APLU has over a decade of experience in administering an award focused on enhancing student success and degree completion for member institutions. Our Degree Completion Award recognizes and promotes innovative practices that improve graduation rates. Drawing on that experience, below I outline recommendations for your award process, and I highlight previous winners of the APLU Degree Completion Award as these examples may prove helpful in developing your award program.

**Awards Process and Logistics**

**Eligibility Requirements:**

The application should be open to all universities that receive Title IV funds, except for those that received the award recently, maybe in the previous four years.

Each university should only be allowed to submit a single application.
**Definitions:**
The program should be as clear and detailed as possible in the scope of what will be considered “student success” in this context. Based on our experience, it should include more than just increasing graduation rates of First-Time Full-Time students and should take great care to avoid making awards to institutions that may improve student achievement by becoming more selective. Therefore, it should include other issues such reducing achievement gaps for traditionally under-represented student groups, improving economic mobility for students from lower socio-economic groups, the effectiveness of programs for adult students, improving students’ ability to move in and out of degree programs seamlessly to accommodate their need for financial stability, etc., all while increasing access and diversity of the student population.

**Application Components:**
Applications should be designed to capture distinct aspects of the institution’s approach to increasing student success. We recommend the following components.

- **Institutional Context and Problem Statement:** Evaluates the clarity and persuasiveness of the institution’s context and the significance of its efforts toward markedly improving student success outcomes.

- **Initiative Design and Approach Rationale:** Focuses on the baseline data, logic, and structure of the proposed initiative, assessing how well the approach addresses the identified issues.

- **Evidence and Impact of Initiative:** Considers the measurable outcomes of the initiative, requiring clear evidence of improvement in retention or graduation rates.

- **Sustainability, Lessons Learned, and Scalability:** Looks at the potential for long-term impact, including how the initiative can be sustained and scaled, and the lessons learned from the implementation.

- **Institutional Data Worksheet:** Provides institutional data on student demographics for the entire population and target populations relevant to the application focus, their graduation rates, retention data, and other outcomes related to the application. This should include at least two years of “baseline data” prior to the start of the intervention and an appropriate number of years (at least two) afterwards to demonstrate the effectiveness of the intervention. The application should include clear metrics by which the effectiveness of the intervention would be assessed. This section should also include a set of clear data definitions.

- **Letter of Support:** Applications should include a Letter of Support, not just endorsement from the president/chancellor. The letter should indicate the importance of the project to their mission and how the university is investing in the lessons learned to drive further improvements in student success.

**Submission Timeline:** The application requires the collaboration of many different offices, including a significant contribution from Institutional Research, so there should be adequate time allowed for the preparation process. We also recommend that the submission timeframe include the summer months, avoiding the institution’s heavy workload at the beginning of the fall semester.

**Review and Evaluation Process:**
The review and evaluation process should be based on four fundamental principles.
**Transparency:** APLU believes that applicants need to have as much information as possible on how their applications are evaluated. This can be achieved by including the points awarded to each section and the overall evaluation rubric.

**Objectivity:** Reviewers should use the same rubric to score each application. Their scores should be made available to all reviewers and help determine the top candidates for discussion.

**Fairness:** Reviewers should be given the opportunity to advocate for applications that obtained low scores if there are exceptional points that need to be considered.

**Inclusion of diverse perspectives:** Despite the objectivity of the review process, we find that reviewers bring their own perspectives resulting in sometimes widely differing scores for the same application. Some reviewers focus on data and quantitative outcomes, whereas others emphasize more qualitative aspects of the initiative. As a result, the review team should consist of experts from a variety of backgrounds, including current university administrators, project leaders in higher education membership organizations, and data experts.

**APLU Degree Completion Award Winners**

**2018 Winner: Wayne State University**
Wayne State University implemented a comprehensive Student Success Initiative, which significantly supported first-generation and low-income students, nearly doubling its graduation rates over six years. [Today@Wayne](#)

**2019 Winner: University of North Carolina at Charlotte (UNC Charlotte)**
UNC Charlotte received the 2019 APLU Degree Completion Award for its exemplary efforts in enhancing student retention and graduation rates. The university implemented a student-centered strategy, which included the 49er Graduation Initiative and the Prospect for Success curriculum, significantly improving its four-year graduation rate by 17 percentage points. [Inside Charlotte](#)

**2020 Winner: Northern Arizona University (NAU)**
Northern Arizona University was recognized for its comprehensive approach to enhancing student success, particularly for first-generation students. The university established the Office of First-Generation Programs in 2014 and introduced a student success and predictive analytics platform. [NAU News](#)

**2021 Winner: Florida State University (FSU)**
Florida State University was honored with the 2021 APLU Degree Completion Award for its outstanding efforts in supporting all students towards graduation, achieving a notable 74% four-year graduation rate. FSU’s initiatives have significantly reduced disparities across race, ethnicity, and income levels, underscoring its commitment to equity and student success. [Florida State University](#)

**2022 Winner: Florida Atlantic University (FAU)**
Florida Atlantic University received acclaim for dramatically doubling its graduation rates since 2014 through a team-based analytics strategy. This strategy involved policy changes, curricular revisions, and financial assistance, which collectively enhanced student progression and graduation timelines. [Florida Atlantic University](#)
2023 Winner: Boise State University
Boise State University was highlighted for its innovative practices in gateway mathematics reform with allowed the institution to dramatically increase their 6-year graduation rate. Additionally, their commitment to data management and governance provided longitudinal data for more than a decade.

APLU appreciates the Department of Education’s efforts to highlight and enhance postsecondary student success through the new Postsecondary Student Success Program. Please know we are eager to continue to serve as a resource.

Sincerely,

Levi Shanks, Ph.D.
Assistant Vice President, Academic and Student Affairs
APLU