



August 22, 2024

Mr. Gregory Martin
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue SW, 5th Floor
Washington, DC 20202

ID: ED-2024-OPE-0050

Dear Mr. Martin,

On behalf of America Forward and the America Forward Coalition, we thank you for the opportunity to share our comments on the Notice of Proposed Rulemaking “Program Integrity and Institutional Quality: Distance Education, Return of Title IV, HEA Funds, and Federal TRIO Programs.” Our comments address the proposed changes regarding the Federal TRIO programs at 34 CFR §§ 643.3, 644.3, and 645.3.

America Forward is the nonpartisan policy initiative of New Profit, a pioneering national venture philanthropy organization that invests in breakthrough social entrepreneurs and systems-change initiatives, catalyzes and builds their impact, and transforms how government and philanthropy pursue social change to ensure that all people can thrive. The America Forward Coalition is made up of more than 100 innovative, high-impact organizations that lead creative solutions to our country’s most pressing social problems ranging from education to economic mobility to democracy. Ensuring all students have access to strong postsecondary navigation support is a major focus of our work.

We applaud the Department’s proposed changes to enable the three TRIO programs that offer student services in a pre-postsecondary education setting—Talent Search, Educational Opportunity Centers, and Upward Bound—to expand their eligibility to include non-citizens. A recent report has shown a decline in the enrollment of undocumented students in higher education since 2019.¹ Access to high-quality tutoring, counseling, mentoring, and information on college admissions to students regardless of immigration status will facilitate their journey path to college enrollment and upward mobility.

¹ American Immigration Council and Presidents’ Alliance on Higher Education and Immigration. “Fact Sheet, Undocumented Students in Higher Education: How Many Students Are in U.S. Colleges and Universities, and Who Are They?” *American Immigration Council and Presidents’ Alliance*, 2023
https://www.americanimmigrationcouncil.org/sites/default/files/research/undocumented_students_in_higher_education_2023.pdf



We work with organizations serving immigrant students, including undocumented students and Deferred Action for Childhood Arrivals (DACA) recipients, who would benefit from expanding all TRIO programs, not just those serving K-12 students, to non-citizens and permanent residents.

Moving forward, we also support efforts to similarly expand access to the TRIO programs offered in the post-secondary setting. Enrolling in a post-secondary institution is one component of ensuring students' access to college. However, it's also important to provide students with support while in college to increase their chances of graduating and give them the skills necessary to be successful in the workforce. Having a college degree serves as a catalyst for immigrant families to have economic mobility, a more robust workforce, and a stronger economy.

Thank you for your attention to and consideration of America Forward's comments. We welcome the opportunity for further dialogue and collaboration. Please contact us at daniel_lopez@newprofit.org if we can be of any assistance.

Sincerely,

Daniel López
Policy Manager
America Forward