

CALIFORNIA BAPTIST UNIVERSITY

Riverside, California

Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP)

Cost-Share: Programmatic Benefit or Limitation?

A Dissertation Submitted in partial fulfillment of the  
Requirements for the degree  
Doctor of Public Administration

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October 2022

Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP)

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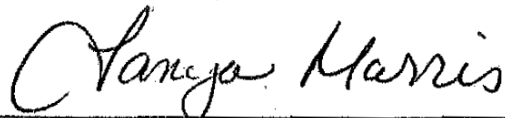
has been approved by the  
College of Arts and Sciences  
in partial fulfillment of the requirements  
for the degree Doctor of Public Administration



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## ABSTRACT

The purpose of this study was to determine whether the matching requirement of the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant is an arbitrary administrative stipulation of the grant or whether it adds meaningful value to the program. If the GEAR UP grant's matching requirement is a detriment to the program, this study sought to determine to what extent. Three frameworks shaped this study. First, the researcher used a similar study conducted by Jeremy Hall in 2010 as a frame of reference. Hall (2010) studied economic development grants in three southern states to discover whether the matching requirement creates a disproportionate burden on nonmetropolitan counties. This study also relied upon the theoretical framework of bureaucratic encounters established by Kahn et al. in 1976. Finally, the researcher viewed this study through Barry Bozeman's 1993 etiology of red tape. This study used a mixed methods explanatory sequential design methodology utilizing a quantitative digital survey and qualitative interviews to study GEAR UP project directors of partnership grants. This study concluded that the grant's matching requirement is not a *prima facie* programmatic limitation. However, poor intraorganizational relationships and existing internal red tape exacerbate the administrative burden of match. Finally, educational organizations interested in pursuing a GEAR UP grant must scrutinize their motivations. This study found those educational organizations whose motivations to apply for the grant align with the grant's mission are likely to be more successful than those organizations that simply seek another revenue stream or want to add another accolade to their educational achievements.

*Keywords:* match, matching, cost-share, cost-sharing, GEAR UP, grant, postsecondary education

## TABLE OF CONTENTS

ABSTRACT .....	iv
LIST OF TABLES .....	ix
LIST OF FIGURES .....	x
CHAPTER 1: INTRODUCTION .....	1
Background .....	3
Statement of the Research Problem .....	4
Purpose Statement .....	5
Research Questions .....	5
Significance of the Problem .....	6
Definitions .....	6
Organization of the Study .....	9
CHAPTER 2: REVIEW OF THE LITERATURE .....	10
The History of GEAR UP .....	11
Types of Awards and Eligibility .....	11
Funding .....	12
Objectives and Required Services .....	12
Scholarship Component .....	13
Implementation Models .....	14
Cost-Share/Match .....	16
Need for GEAR UP in Disadvantaged Communities .....	19
Need for GEAR UP in South Dakota .....	20
South Dakota Native American Student Achievement .....	22
Native American Enrollment in Postsecondary Education .....	24
South Dakota GEAR UP Award .....	25
South Dakota GEAR UP Objectives .....	25
South Dakota GEAR UP Scholarship Component .....	26
South Dakota GEAR UP Implementation .....	26
Foundational Elements of the 2011 Application .....	26
Middle School Grade-Specific Enhancements .....	27
High School Grade-Specific Enhancements .....	29
High School-to-Postsecondary Transition Enhancements .....	32
South Dakota GEAR UP Match .....	33
Similar Programs .....	34
UB Program .....	35
TS Program .....	36
EOCs .....	37
SSS Program .....	37
Ronald E. McNair Postbaccalaureate Achievement .....	38
Staff Development .....	38
TRIO in South Dakota .....	39

Criticism of the GEAR UP Grant .....	39
Program.....	41
COVID-19 Impacts.....	43
Theoretical Implications .....	45
Rules Born Bad.....	47
Inadequate Comprehension.....	48
Self-Aggrandizement and Illegitimate Functions .....	49
Negative Sum Compromise .....	50
Overcontrol .....	50
Negative Sum Process.....	51
Good Rules Gone Bad .....	51
Rule Drift .....	51
Rule Entropy .....	52
Change in Implementation.....	52
Change in the Functional Object.....	52
Change in the Rule's Efficacy .....	52
Rule Strain .....	52
Accretion.....	53
Misapplication.....	53
Summary .....	53
 CHAPTER 3: METHODOLOGY .....	 54
Purpose Statement.....	54
Research Questions .....	55
Research Design.....	56
Population .....	57
Sample.....	58
Quantitative Instrument .....	59
Quantitative Pilot Study .....	60
Quantitative Data Collection.....	61
Quantitative Data Analysis .....	61
Qualitative Instrument .....	62
Qualitative Pilot Study.....	62
Qualitative Data Collection.....	63
Qualitative Data Analysis .....	64
Limitations .....	64
Assumptions.....	65
Summary .....	66
 CHAPTER 4: RESEARCH, DATA COLLECTION, AND FINDINGS.....	 67
Overview.....	67
Purpose Statement.....	67
Research Questions .....	67
Research Methods and Data Collection Procedures .....	68
Presentation and Analysis of Data .....	71
Quantitative Data .....	72
Demographic Data .....	72

Likert Scale Questions .....	75
Qualitative Data .....	79
Research Questions .....	88
Research Question 1 .....	88
Quantitative Findings.....	88
Qualitative Findings.....	89
Research Question 2 .....	90
Quantitative Findings.....	91
Qualitative Findings.....	92
Research Question 3 .....	93
Quantitative Findings.....	93
Qualitative Findings.....	94
Research Question 4 .....	95
Quantitative Findings.....	95
Qualitative Findings.....	97
Summary .....	98
CHAPTER 5: FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS .....	100
Major Findings.....	100
Quantitative Findings.....	100
Qualitative Findings.....	101
Findings in Relation to Theory .....	104
Unexpected Findings .....	106
Conclusions.....	107
Implications for Action .....	108
Recommendations for Further Research.....	109
Concluding Remarks and Reflections.....	109
REFERENCES .....	111
APPENDICES .....	122
A. GEAR UP PARTNERSHIP GRANT MATCH WAIVER OPTIONS.....	123
B. 2011 SOUTH DAKOTA GEAR UP GRANT PERFORMANCE MEASURES .....	126
C. DECEMBER 2020 COVID-19 MATCH WAIVER FLEXIBILITY LETTER.....	129
D. MARCH 2021 COVID-19 MATCH WAIVER FLEXIBILITY LETTER .....	133
E. MATCH WAIVER REQUEST FORM .....	136
F. EXECUTED MOU BETWEEN RESEARCH AND NCCEP .....	140
G. IRB APPROVAL.....	142

H. QUANTITATIVE SURVEY QUESTIONS.....	144
I. QUALITATIVE INTERVIEW QUESTIONS .....	147



## LIST OF TABLES

Table 1. Types of Cohort Designs .....	15
Table 2. 2018–2019 South Dakota Annual State Assessments Report Card.....	23
Table 3. 2018–2019 South Dakota Annual State Assessments Report Card.....	23
Table 4. 2018–2019 South Dakota Annual State Assessments Report Card.....	24
Table 5. 2018–2019 South Dakota Annual State Assessments Report .....	24
Table 6. TRIO Awards in South Dakota.....	41
Table 7. Bozeman’s Etiology of Red Tape.....	48

## LIST OF FIGURES

Figure 1. DCI for American Indians or Alaska Natives in South Dakota .....	21
Figure 2. Kahn et al.'s Bureaucratic Encounters .....	47
.....	105
Figure 3. Selecting Qualitative Sample Size.....	71
Figure 4. Results of Quantitative Survey Question 3 .....	74
Figure 5. Results of Quantitative Survey Question 8 .....	74
Figure 6. Results of Quantitative Survey Question 10 .....	76
.....	96
Figure 7. Results of Quantitative Survey Question 11 .....	76
.....	93
Figure 8. Results of Quantitative Survey Question 12 .....	78
.....	89
Figure 9. Results of Quantitative Survey Question 13 .....	78
.....	97

## CHAPTER 1: INTRODUCTION

The Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant is a federal, discretionary education grant created in 1998 (U.S. Department of Education [U.S. Ed.], 2008a). The mission of the GEAR UP grant is to “support efforts to increase the number of low-income students that obtain a secondary school diploma and prepare for and succeed in postsecondary education” (U.S. Ed., 2022b, Question 4). Per U.S. Ed. (2022c), there are two authorized grant performance periods, 6 years or 7 years dependent upon whether the grant extends through the students’ 1st year of postsecondary school.

The South Dakota Department of Education (SDDOE) received two GEAR UP grants. The first grant was awarded in 2005 and extended through 2011 (Madsen, 2018), and the second grant was awarded in 2011 and extended through 2018, which included a 1-year, no-cost extension. Although the SDDOE was awarded both GEAR UP grants, the second GEAR UP grant, awarded in 2011, was passed from the SDDOE to a subreceipt, Mid-Central Educational Cooperative (MCEC). MCEC was an educational cooperative founded in 1976 in Platte, South Dakota (Madsen, 2018). SDDOE contracted with MCEC to administer the day-to-day operations of the South Dakota GEAR UP grant.

After several warning signs, such as audit findings, whistleblower complaints, lack of proper documentation, and a shortage of legitimate matching dollars, then SDDOE Secretary Melody Schopp emailed MCEC Executive Director Dan Guericke to request a meeting (Ferguson & Ferguson, 2018; Madsen, 2018). On September 16, 2015, Secretary Schopp and Guericke had a phone conversation approximately 6:00 p.m. (Madsen, 2018). At that time, Secretary Schopp alerted Guericke that SDDOE would be

terminating its contract with MCEC for administering the GEAR UP grant (Madsen, 2018). Earlier that day, MCEC Business Manager Scott Westerhuis drove 3.5 hr from Platte, South Dakota, to Howes, South Dakota (Madsen, 2018). After Secretary Schopp informed Guericke that SDDOE intended to end the contract with MCEC, Guericke called Westerhuis on his drive home (Madsen, 2018). Guericke and Westerhuis spoke at length, and on the morning of September 17, 2015, Platte residents reported a fire at the Westerhuis property (Madsen, 2018). The South Dakota Division of Criminal Investigation later concluded that Scott Westerhuis shot and killed his wife, Nicole Westerhuis, his four children, Michael, Conner, Jacci, and Kailey Westerhuis, set their home on fire, and then shot himself (Ferguson & Ferguson, 2018; Madsen, 2018).

Although the explanation as to why Scott Westerhuis committed such horrible acts will likely never be entirely known; it may be that the pressures of managing the nearly \$25 million grant, excluding matching funds, contributed to his decision. In May of 2015, investigative journalist Bob Mercer wrote an article that shed light on the findings of a 2014 audit of MCEC conducted by the South Dakota Department of Legislative Audit (DLA; Madsen, 2018). Mercer's 2015 article listed the audit's findings, which included overpayment from SDDOE to MCEC, compensation to two MCEC advisors without proof of work, and a dispute concerning the valuation of software contributing to a significant portion of MCEC's matching dollars. The DLA valued the 500 software licenses at \$499 each, but MCEC proclaimed that each license was worth \$4,000 (Mercer, 2015). Presumably, the onus of being nearly \$2 million short in match provoked Scott Westerhuis' heinous deeds.

In addition to Scott Westerhuis’s wife and children, the real sufferers of this tragic tale are the South Dakota youth, specifically its Native American youth, who were deserving of the GEAR UP funds. In South Dakota, the GEAR UP grant largely operated in or near schools on Native American reservations primarily serving Native American students. The GEAR UP scandal has halted academic services that could positively change the trajectory of the lives of Native American children in poverty. If the steep match requirement of the GEAR UP grant prohibits educational organizations from applying for or successfully administering the award, the GEAR UP grant is contributing to systemic poverty and poor educational outcomes instead of preventing it.

### **Background**

Although less than 25 years old, the GEAR UP grant has become a well-established federal education grant. In FY 2022, GEAR UP received \$378 million in appropriations from Congress, a \$10 million increase from the previous year’s allocation (National Council for Community and Education Partnerships [NCCEP], n.d.). These dollars allowed GEAR UP to serve 572,000 students in over 3,474 secondary schools in 43 states (NCCEP, n.d.). These 6- or 7-year grants allow customization through two different award types and implementation models—state grants and partnership grants. In FY 2021, there were 35 active state grants and 120 partnership grants (U.S. Ed., 2021). The grant provides flexibility to projects as long they make progress toward the overarching GEAR UP mission, which is to “increase the number of low-income students that [sic] obtain a secondary school diploma and prepare for and succeed in postsecondary education” (U.S. Ed., 2022b, Question 4). In South Dakota, there is a great

need for the GEAR UP grant because of the poverty in its nine Native American reservations and the poor educational outcomes of its Native American students.

However, the matching requirement of the GEAR UP grant, also called cost-share, has made the project challenging to administer, leading to uncertain success at best. The grant requires a one-to-one match. In other words, for every dollar of GEAR UP funds spent, projects need to spend another dollar in match. The match can be either hard match, such as cash, or soft match, such as in-kind services, supplies, and materials. Most often, GEAR UP grants use in-kind match to meet the cost-share requirements. This study used the words *match* and *cost-share* interchangeably. Relying on soft match to meet the cost-share requirements of the grant leads to various administrative problems.

### **Statement of the Research Problem**

The GEAR UP grant's one-to-one match requirement may be placing an inordinate burden on educational organizations, ultimately discouraging them from applying and administering the award to students in need. It is problematic that the GEAR UP cost-share requirement may be alienating organizations from applying for the grant because of the excessive time and effort needed to meet the match requirements. If the cost-share component of the grant is found to be so exorbitant, it is inadvertently preventing educational organizations from applying for and successfully administering the grant, the rules and regulations of the grant may be detracting from its very purpose. If the GEAR UP matching requirement is not rectified, thousands of low-income students may not be receiving the academic GEAR UP services for which they qualify.

## **Purpose Statement**

This study had two short-term goals. First, this study sought to determine whether the cost-share component of the GEAR UP grant is so burdensome it prevents educational organizations from applying for and successfully administering an award, and second, if the matching requirement of the grant was found to be detrimental to the grant's purpose, this study sought to determine to what extent. For more long-term goals, the researcher hoped not only to contribute to a gap in the literature on the GEAR UP grant generally but also to determine whether the cost-share requirements for grants-in-aid produce more quality programmatic services or inadvertently preclude certain educational organizations from applying for federal funding with cost-share stipulations.

This study is loosely based on a similar study conducted by Jeremy L. Hall in 2010 in an article entitled "Giving and Taking Away: Exploring Federal Grants' Differential Burden on Metropolitan and Nonmetropolitan Regions." In this article, Hall's (2010) study researched economic development grants in three southern states to discover whether the cost-share requirement of federal economic development grants creates a disproportionate burden on nonmetropolitan counties. Hall's research found that population alone was not the sole factor in determining burden. This study intended to build upon the previous study to determine whether the cost-share component of the GEAR UP grant detracts from the grant's overall purpose or enhances it.

## **Research Questions**

The following questions guided this study:

1. To what extent does the cost-share requirement of the GEAR UP grant affect organizations' desire to apply?

2. Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?
3. To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?
4. Is the cost-share component of the GEAR UP grant a programmatic benefit or programmatic limitation?

### **Significance of the Problem**

This researcher aimed to determine whether Hall's (2010) findings still hold true. In addition, this researcher hoped to contribute to the larger conversation on the burden of cost-share embedded in grants-in-aid. The research conducted by Hall investigated whether a differential cost-share burden exists between metropolitan and nonmetropolitan counties. Hall found that geographic location alone was not the sole factor in determining cost-share burden. However, Hall specifically called for "further analysis in hopes that it may inform federal grant policy, particularly [in] regard [to] the use of local match requirements" (p. 272). Moreover, dependent upon the outcomes of this study, the researcher hopes educational organizations may use the results of this research to provide U.S. Ed. documentation in applying for GEAR UP match waivers. Finally, the researcher hopes the results of this study may influence the federal government to rethink the cost-share requirements of grants-in-aid.

### **Definitions**

**Burden.** A GEAR UP project's burden is determined by the programmatic benefit to programmatic limitation ratio. If a GEAR UP project experiences a great deal of



burden, the programmatic benefit to limitation ratio weighs more heavily on the programmatic limitation side of the theoretical scale.

**Code of Federal Regulations (CFR).** The codification of the general and permanent rules published in the Federal Register by the departments and agencies of the federal government.

**Cohort Design.** One of two implementation designs of the GEAR UP grant in which a project services a cohort of students. There are three different types of cohort design. State and partnership grantees may use a cohort design.

**Cost Sharing or Matching.** “The portion of project costs not paid by Federal funds or contributions (unless otherwise authorized by Federal statute)” (National Archives and Records Administration, 2023b, Cost sharing or matching heading).

**Hard Match (Cash Match).** Includes cash spent for project-related costs. An allowable cash match must include costs that are allowable with federal funds, except acquisition of land, when applicable.

**Local Education Agency (LEA).**

A public board of education or other public authority within a state that maintains administrative control of public elementary or secondary schools in a city, county, township, school district, or other political subdivision of a state. School districts and county offices of education are both LEAs. (EdSource, n.d., Glossary)

**Postsecondary School.** “Postsecondary education includes non-degree programs that lead to certificates and diplomas plus six degree levels: associate, bachelor, first professional, master, advanced intermediate, and research doctorate” (U.S. Ed., 2008b, para. 1).

**Programmatic Benefit.** When administering a grant, there are generally several, and oftentimes, competing objectives required of the grant administrator. There are the administrative obligations and the short- and long-term goals and objectives of the grant itself. Programmatic benefits are the obligations of the grant administrators who contribute to the short- and long-term goals and objectives of the grant and most directly aid the recipients of the grant.

**Programmatic Limitation.** When administering a grant, there are generally several, and oftentimes, competing objectives required of the grant administrator. There are the administrative obligations and the short- and long-term goals and objectives of the grant itself. Programmatic limitations are the obligations of the grant administrators who contribute to administrative objectives of the grant and indirectly aid the recipients of the grant.

**Priority Model.** One of two GEAR UP implementation designs in which a project serves disconnected students. Only state grantees may use a priority model.

**Secondary School.** Secondary school is otherwise known as high school in the United States. Typically secondary school consists of Grades 9–12.

**Soft Match (In-kind Contributions).** Includes the valuation of noncash contributions. In-kind contributions may be in the form of services, supplies, real property, and equipment.

**Uniform Grant Guidance (UGG).** The UGG “provides the overarching guidelines for administering Federal awards and expenditures” found in the CFR at 2 CFR 200 (National Archives and Records Administration, 2023d).

### **Organization of the Study**

The researcher organized this study into five parts. Chapter 1 included the background, statement of the research program, purpose statement, research questions, significance of the program, and definitions, Chapter 2 is the literature review. The literature review explains the history, significant elements, and criticism of the GEAR UP grant. Chapter 3 comprises the methodology and describes the research design and research instruments and presents the methods of data analysis. The methodology also discusses assumptions and limitations as well as the ethical procedures taken. Chapter 4 illustrates the research findings. Finally, Chapter 5 delivers conclusions and recommendations based on the findings of the study.

## CHAPTER 2: REVIEW OF THE LITERATURE

Only a handful of articles exists concerning the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant. Scholars have written even fewer of those articles within the last 10 years. The literature generally involves topics in education, such as postsecondary performance and persistence (Sanchez et al., 2018); studies analyzing specific interventions (Bolshakova, 2019; Capizzi et al., 2017; Ellis & Helaire, 2018; Monk et al., 2014); and articles that discuss how GEAR UP serves traditionally marginalized students (Dierker et al., 2017; Schaeffle, 2018; Ward et al., 2013). This researcher proposed that the scarcity of literature on the subject may be due to the relative newness of the grant itself.

However, Hall's (2010) study mostly represented the researcher's desired research on the GEAR UP matching requirement except that it involved the matching requirements of economic development grants in three southern states. In the study conducted by Hall, he found that the cost-share conditions of federal economic development grants create a disproportionate burden for nonmetropolitan counties in Alabama, Georgia, and South Carolina. Despite this, Hall found that population alone was not the sole factor in determining cost-share burden. He uncovered that geographic isolation, low per capita personal income, and large areas with few resources indicate burden more than population alone (Hall, 2010).

Literature relating to South Dakota GEAR UP specifically has numerous newspaper articles written about the Westerhuis murder-suicide, the mismanagement of the South Dakota grant, and the subsequent court proceedings. An honors thesis was also composed on the conflicts of interest during Mid-Central Educational Cooperative's

(MCEC) grant administration (Madsen, 2018). There is little literature on the South Dakota grant before the scandal in 2015. After the tragedy, the award was subgranted from the South Dakota Department of Education (SDDOE) to Black Hills State University (BHSU), one of South Dakota's six regental institutions, located in Spearfish, South Dakota. Although the 2011 grant finished its entire project period and was even allowed a 1-year, no-cost extension by the U.S. Ed., few articles exist on any of the grant's successes (BHSU, 2019; Bultena, 2016; "GEAR UP Summer Honors Program," 2017).

### **The History of GEAR UP**

The GEAR UP grant was established in 1998 when Congress authorized the program under Title IV of the Higher Education Act (HEA) of 1965 (U.S. Ed., 2019b). The amendment, H.R.6, initiated in the 105th Congress, was sponsored by Representative Howard P. "Buck" McKeon (R-CA; Congress.gov, n.d.). The program has generally received bipartisan and bicameral support since its inception over 2 decades ago. At present, "GEAR UP serves over 572,000 students enrolled in over 3,208 secondary schools across 46 states" (NCCEP, n.d., #GEARUPworks). Despite this, GEAR UP is a highly competitive grant, and fewer than one in five applicants are funded (NCCEP, n.d.).

### **Types of Awards and Eligibility**

U.S. Ed. offers two types of GEAR UP grants, state grants and partnership grants. To be eligible for a GEAR UP project, both state and partnership grant applications must consist of one or more local educational agencies (LEAs), otherwise known as school districts. In addition, the project must include one or more degree-granting institutions of

higher education (IHE), such as a college, university, technical college, or junior college. It must also partner with “two other community organizations or entities, such as businesses, professional organizations, State agencies, institutions ... or other public or private agencies or organizations” (U.S. Ed., 2019a, Partnership Grants Section B). The primary difference between a state grant and a partnership grant is that the governor must select which state agency applies for and administers the grant (U.S. Ed., 2019a).

### **Funding**

In FY 2021, there were 35 state grants and 120 partnership grants for a total of 155 GEAR UP grants (U.S. Ed., 2021). Funding and the subsequent competition are based on Congress’s allocation to GEAR UP each year. Congress appropriated the GEAR UP initiative \$368 million in FY 2021 (U.S. Ed., 2021), which was a \$3 million increase from the FY prior (NCCEP, n.d.). On average, in FY 2021, new state grants received \$3,538,986, and new partnership grants received \$2,108,047 (U.S. Ed., 2021). The maximum award a state grant can receive per year is \$5 million, and the maximum award a partnership grant may receive is up to \$800 per student served, per year (U.S. Ed., 2021).

### **Objectives and Required Services**

The GEAR UP grant has three overarching goals: “(1) increase the postsecondary expectations and readiness of students; (2) improve high school graduation and postsecondary enrollment rates; and (3) raise the knowledge of postsecondary options, preparation, and financing among students and families” (NCCEP, n.d., para. 1). Although not explicitly prescribed how to achieve these three overarching goals because GEAR UP does not have standardized objectives, all GEAR UP projects must provide

certain required services (U.S. Ed., 2022b). In addition to providing comprehensive mentoring, outreach, and supportive services, projects must implement the following activities:

- 1) [provide] information regarding financial aid for postsecondary education for participating students;
- 2) encourage student enrollment in rigorous or challenging curricula and coursework in order to reduce the need for remedial coursework at the postsecondary level;
- 3) improve the number of participating students who obtain a secondary school diploma and complete applications for and enroll in a program of postsecondary education; and
- 4) State projects must provide GEAR UP scholarships. (US. Ed., 2022a, Question 22)

In addition to the required services, both partnership and state projects may implement permissible activities, such as tutoring, college tours, job shadowing, and cultural enrichment (U.S. Ed., 2022b).

### **Scholarship Component**

As indicated by the required services, state GEAR UP projects must provide GEAR UP scholarships unless granted a scholarship waiver by U.S. Ed. GEAR UP state grantees must allocate no less than 50% of their federal funding to student scholarships (U.S. Ed., 2022b). However, state grantees may submit a waiver to U.S. Ed. (2022b) to allocate more than 50% of their federal funds toward scholarships. Partnership grantees are not required to provide student scholarships, but they may use federal or nonfederal

funds if they choose to do so. To be eligible for a GEAR UP scholarship, students must meet the following criteria:

- 1) have participated in a GEAR UP project;
- 2) are under 22 years of age;
- 3) possess a high school diploma or equivalent; and
- 4) are enrolled or accepted for enrollment at a program of undergraduate instruction (at) [sic] an IHE that is located in the State's boundaries, except that, at the grantee's option, a State or Partnership may offer scholarships to students who attend institutions of higher education outside the State. (U.S. Ed., 2022b, Question 30)

GEAR UP projects may not establish additional scholarship conditions, and the scholarships may not be less than the amount of the Pell grant in the year in which the student will use the scholarship (U.S. Ed., 2022b).

### **Implementation Models**

In addition to the two types of GEAR UP awards, state grants and partnership grants, there are two implementation models, a cohort design and a priority student model. Partnership grants must use a cohort design (U.S. Ed., 2022b). There are three types of cohort designs as indicated in Table 1.



**Table 1**

*The Three Types of Cohort Designs*

Type	Example
Single Grade Cohort	Serve just one class of 7th graders throughout the grant
Multi-Cohort	Starting with 6th and 7th graders and continuing to serve them throughout the grant
Feeder Pattern Cohort	Starting with a single grade (ex. 7th graders) the first year and then pick up another 7th grade class each year

*Note.* From *Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP): Frequently Asked Questions*, by U.S. Department of Education, 2022b, Question 25 (<https://www2.ed.gov/programs/gearup/faq.html#question2>).

State grants may use a cohort design or a priority student model to implement their GEAR UP project. According to U.S. Ed. (2022b), a priority student model aims to serve “disconnected students,” yet U.S. Ed. does not define the term (Question 28). U.S. Ed. does, however, provide attributes that disconnected students may encompass. These characteristics are as follows:

- Eligible for free or reduced-price lunch;
- Limited English proficient;
- From groups that are traditionally underrepresented in postsecondary education;
- Individuals with disabilities;
- Homeless children or youth; or
- Students in foster care. (U.S. Ed., 2022b, Question 28)

Some state GEAR UP projects focus on one case of disconnected students, such as homeless students, and other projects serve all students in a low-income school under the free or reduced-price lunch qualification.

## **Cost-Share/Match**

Although already a complex grant because of the two awards, two implementation designs, and broad definition of terms, the GEAR UP grant is further complicated by its cost-share requirement, otherwise known as match. The GEAR UP grant is a dollar-for-dollar matching grant (U.S. Ed., 2022b). In other words, for every federal dollar spent by an awardee, another dollar must be contributed by the project from a nonfederal source (U.S. Ed., 2022b). The GEAR UP grant allows for two kinds of match. The first type of match is a cash match, sometimes referred to as a hard match. The second type of match is called in-kind contributions, often referred to as soft match. Examples of an in-kind match may include labor, rental space, equipment, and goods and services.

The Uniform Grant Guidance (UGG) provides match regulations for the GEAR UP grant as well as for other federal grants that require a cost-share. The Code of Federal Regulations (CFR) houses the UGG in 2 CFR 200. A key component of federal grants requiring cost-share (2 CFR §200.306) is that the matching dollars cannot be contributions from another federal award (National Archives and Records Administration, 2023a). However, state, local, and private dollars can be used as match so long as they conform to the other regulations outlined in the UGG. Subpart E, Cost Principles of the UGG, governs allowable costs. As stated in CFR Section 200.403, factors affecting allowability of costs are as follows:

- a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.

- c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
- f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- g) Be adequately documented.
- h) Cost must be incurred during the approved budget period. The Federal awarding agency is authorized, at its discretion, to waive prior written approvals to carry forward unobligated balances to subsequent budget periods pursuant to §200.308(e)(3). (National Archives and Records Administration, 2023c, CFR Content webpage)

To be allowable under federal awards, costs of programs such as GEAR UP must meet these general criteria except when otherwise authorized by statute.

Yet, GEAR UP partnership grantees may request a match waiver. There are varying match waivers (a 75% match waiver, a 70% match waiver, and a 50% match waiver), all with different durations and requirements. For example, to be eligible for a 75% match waiver for up to 2 years, the applicant must demonstrate significant economic

hardship such as a natural disaster (U.S. Ed., 2022b). To receive a 70% match waiver for the length of a project, an applicant must meet the following criteria:

- Have three or fewer IHEs;
- Be a fiscal agent that is eligible to receive funds under title V (Developing Institutions), or Part B of title III (a Historically Black College or University), or section 316 or 317 of the HEA (an American Indian Tribally Controlled College and University or Alaska Native And [sic] Native Hawaiian-Serving Institution), or be an LEA;
- Only have participating schools with a 7th grade cohort in which at least 75 percent of the students are eligible for free or reduced-price lunch; and
- Only have LEAs in which at least 50 percent of the students enrolled are eligible for free or reduced-price lunch. (U.S. Ed., 2022b, Question 18)

To receive a 50% match waiver for up to 2 years, the applicant “must demonstrate a pre-existing and on-going significant economic hardship that precludes the applicant from meeting its matching requirement” (U.S. Ed., 2022b, Question 18). U.S. Ed. allows severe distress in the local economy and local unemployment rates higher than the national average as instances that may qualify for match waivers under this criterion.

Only partnership grantees may request a match waiver.

In addition, there is another tentative 50% match waiver option. This match waiver option is for prospective partnership grant applicants. For this match waiver option, the applicant needs to experience hardship, such as one stated in the previously listed 50% match waiver option but also submit documentation every 2 years to U.S. Ed. to confirm the hardship still exists and the grantee “tried diligently, but unsuccessfully, to

obtain contributions needed to meet the matching requirement” (U.S. Ed., 2022b, Question 18). Lastly, for partnership grantees only, if outlined in their original grant application, a partnership grantee with a scholarship component funded via matching dollars may count the match twice. A complete table of types of match waivers, including the duration, requirements, and the relating regulations, are found in Appendix A.

### **Need for GEAR UP in Disadvantaged Communities**

The mission of the GEAR UP grant is to “support efforts to increase the number of low-income students that obtain a secondary school diploma and prepare for and succeed in postsecondary education” (U.S. Ed., 2022b, Question 4). Several studies have shown students from low socioeconomic households are less likely to go to college (Carnevale & Rose, 2003; Fitzgerald & Delaney, 2002; Gladieux, 2004; Jacobson & Mokher, 2009; Wirt et al., 2004). The effects of education on earning potential has also been well documented (Bhuller et al., 2014; Cooke, 2003; Gouskova et al., 2010; Hauser & Daymont, 1977; Johnson & Stafford, 1974; Tamborini et al., 2015). According to Jacobson and Mokher (2009), “Low-income students are at a particular disadvantage due to the presence of systematic barriers to educational attainment, thus perpetuating an intergenerational cycle of poverty” (p. 9). The GEAR UP grant was formed as an additional support for low socioeconomic students to aid in their success in completing secondary education and enrolling in and succeeding in postsecondary education, effectively increasing their earning potential and breaking the intergenerational cycle of poverty.

## **Need for GEAR UP in South Dakota**

South Dakota is home to nine Native American tribes, each with a corresponding reservation: Cheyenne River Sioux, Crow Creek Sioux, Flandreau Santee Sioux, Lower Brule Sioux, Oglala Sioux, Rosebud Sioux, Sisseton Wahpeton Oyate, Standing Rock Sioux, and Yankton Sioux (South Dakota Department of Tribal Relations, n.d.). In 2019, the U.S. Census Bureau (n.d.) listed Buffalo County, South Dakota, as the third poorest county, with an estimated household income of \$26,671. Buffalo County is home to the Crow Creek Sioux Tribe (U.S. Census Bureau, n.d.). In addition to Buffalo County, four other South Dakota counties ranked in the estimated top 100 poorest counties, including Corson, Oglala, Todd, and Ziebach counties. These counties encompass the Standing Rock Indian Reservation, the Cheyenne River Indian Reservation, the Rosebud Indian Reservation, and the Pine Ridge Indian Reservation, respectively (U.S. Census Bureau, n.d.). For this reason, the GEAR UP grant has primarily served schools located on or near the nine Native American reservations in South Dakota.

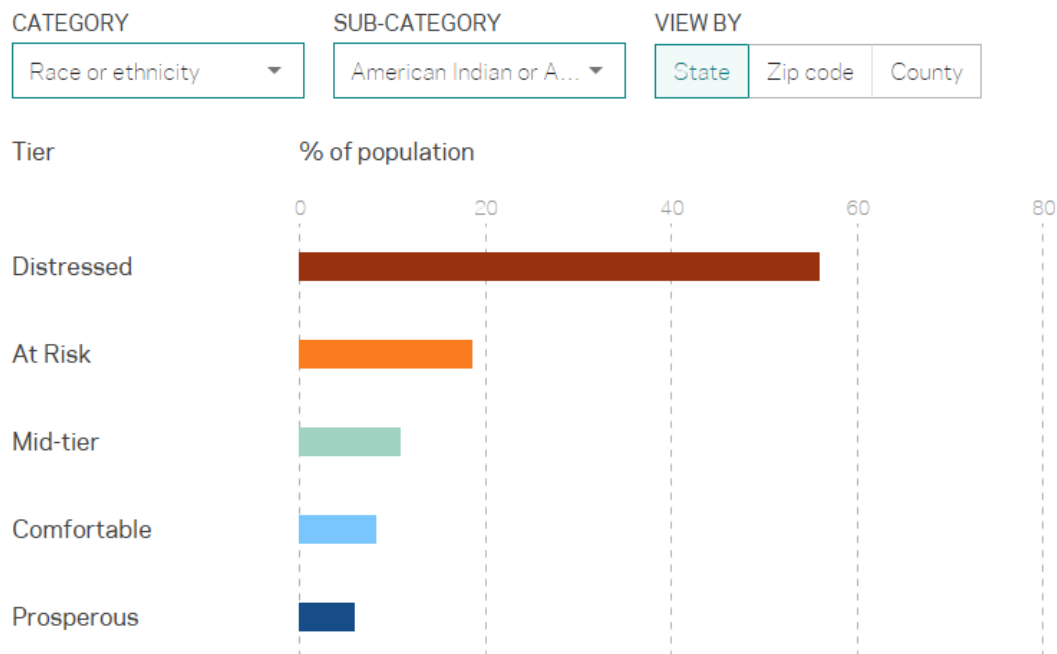
The Economic Innovation Group (EIC, n.d.-a) is a self-proclaimed “bipartisan public policy organization that combines innovative research and data-driven advocacy to address America’s most pressing economic challenges” (Our Work). According to the EIC’s Distressed Communities Index (DCI) and interactive map, more than 7% of South Dakota’s population lives in an economically distressed community. Seven components are taken into consideration to create the methodology for the DCI: (a) the percentage of the population without a high school diploma, (b) the housing vacancy rate, (c) the percentage of adults not working, (d) the poverty rate, (e) the median income ratio, (f) the change in employment, and (g) the change in establishments. Regarding the map’s

demographic distribution of distressed communities, 56% of South Dakota’s Native American population live in a distressed community. The percentage increases to nearly 75% of South Dakota’s Native American population with the addition of communities at risk of becoming distressed. The EIC’s demographic distribution of American Indians or Alaska Natives in South Dakota is included in Figure 1.

**Figure 1**

*Distressed Communities Index for American Indians or Alaska Natives in South Dakota*

### Demographic distribution



Note. From Interactive Map, by Economic Innovation Group, n.d.-b, Demographic distribution (<https://eig.org/distressed-communities/2022-dci-interactive-map/?path=state/SD&sub-category=native>).

### ***South Dakota Native American Student Achievement***

The SDDOE publishes a report card each school year detailing educational outcomes on academics and school quality. In school year (SY) 2020–2021, there were 149 school districts in South Dakota covering 688 schools with 9,825 educators and 135,984 students enrolled in South Dakota accredited schools (SDDOE, n.d.-b). Of the 135,984 students in SY 2020–2021, 10.68%, or about 14,523, were on the state’s report card as American Indian/Alaska Native (SDDOE, n.d.-b). The coronavirus (COVID-19) pandemic fostered many unprecedented learning conditions; thus, the SDDOE (n.d.-b) recommended that the 2020–2021 Report Card not be compared to previous years. Because the COVID-19 pandemic affected South Dakota as early as March of 2020 (“South Dakota governor closes schools,” 2020), the researcher looked at SY 2018–2019 as the last comparable year of report card data.

In South Dakota, students in Grades 3–8 and 11 take annual state assessments for English language arts and mathematics, and Grades 5, 8, and 11 take a yearly science exam (SDDOE, n.d.-b). In SY 2018–2019, 54% of students in Grades 3–8 and 11 were proficient in English language arts, 46% of students in Grades 3–8 and 11 were proficient in mathematics, and only 40% of students in Grades 5, 8, and 11 were proficient in science (SDDOE, n.d.-b). Table 2 summarizes these statistics. In addition, throughout the state in SY 2018–2019, South Dakota students completed high school at a rate of 90% and displayed a College and Career Readiness rate of 48% (SDDOE, n.d.-b). According to the SDDOE’s (n.d.-a) Calculation Guide, College and Career Readiness is a “comprehensive measure that includes assessments and course work for both college and career readiness students are required to meet” (p. 16). Table 3 summarizes the data.



**Table 2***2018–2019 South Dakota Annual State Assessments Report Card, Student Proficiency*

Assessment	Grades	%
Proficient in English language arts	3–8 and 11	54
Proficient in mathematics	5, 8, and 11	46
Proficient in science	5, 8, and 11	40

*Note.* Adapted from State report card 2021-2022, by South Dakota Department of Education, n.d.-b (<https://sdschools.sd.gov/#/home>)

**Table 3***2018–2019 South Dakota Annual State Assessments Report Card, State Averages*

Assessment	State average
High school completion rate	90%
College and career readiness rate	48%

*Note.* Adapted from State report card 2021-2022, by South Dakota Department of Education, n.d.-b (<https://sdschools.sd.gov/#/home>)

However, these indicators drastically differ when one looks specifically at Native American educational outcomes rather than the entire state. In SY 2018–2019, although 54% of South Dakota students in Grades 3–8 and 11 were proficient in English language arts overall, only 23% of Native American students in the same grades achieved the same proficiency (SDDOE, n.d.-b). Although 46% of South Dakota students overall were proficient in mathematics, only 14% of Native American youth in Grades 3–8 and 11 acquired the same proficiency (SDDOE, n.d.-b). In addition, although 40% of South Dakota students overall in Grades 5, 8, and 11 were proficient in science, only 13% of Native American students had the same ability (SDDOE, n.d.-b). Table 4 shows the data. Though 90% of South Dakota students overall completed high school, only 66% of Native American students completed high school, the lowest of any ethnicity/race in the

state (SDDOE, n.d.-b). Finally, only 13% of Native American students were college and career ready compared to 48% of South Dakota students overall (SDDOE, n.d.-b).

Table 5 compares the state average versus Native American students' average in South Dakota.

**Table 4**

*2018–2019 South Dakota Annual State Assessments Report Card, Student Proficiency Comparison*

Assessment	Grades	State average	Native American student average
Proficient in English language arts	3–8 and 11	54%	23%
Proficient in mathematics	5, 8, and 11	46%	14%
Proficient in science	5, 8, and 11	40%	13%

*Note.* Adapted from State report card 2021-2022, by South Dakota Department of Education, n.d.-b (<https://sdschools.sd.gov/#/home>)

**Table 5**

*2018–2019 South Dakota Annual State Assessments Report, Student Completion and Readiness Comparison*

Assessment	State average	Native American student average
High school completion rate	90%	66%
College and career readiness rate	48%	13%

*Note.* Adapted from State report card 2021-2022, by South Dakota Department of Education, n.d.-b (<https://sdschools.sd.gov/#/home>)

### ***Native American Enrollment in Postsecondary Education***

In addition, according to the Postsecondary National Policy Institute (PNPI, 2021), only 19% of Native American students between ages 18 and 24 years enrolled in postsecondary education in SY 2018–2019. Although 62% of all students attending a 4-

year institution in 2012 graduated college within 6 years, only 41% of Native American students graduated within the same timeframe (PNPI, 2020). Approximately 16% of Native Americans nationwide have attained a bachelor's degree (PNPI, 2020). In the fall of 2012, only 3.1% of Native American students enrolled in one of the six South Dakota regental institutions compared to the statewide population proportion of 8.8% (South Dakota Board of Regents, 2013).

### ***South Dakota GEAR UP Award***

South Dakota received two GEAR UP state grants, the first in 2005 and the second in 2011. Both grants were designated to the SDDOE by former Governor of South Dakota Mike Rounds who served from 2003 to 2011 (U.S. Senate, n.d.). The 2005 GEAR UP grant was awarded a little less than \$2 million per year for approximately \$7 million over 6 years (Madsen, 2018). The second GEAR UP application in 2011 was initially granted \$24 million, or approximately \$3.5 million per year ("S.D. Gear Up Re-Funded and Ready," 2011). Between the two awards, and including matching dollars, in theory roughly \$62 million was to be spent on South Dakota GEAR UP students between 2005 and 2018.

### ***South Dakota GEAR UP Objectives***

To achieve the three overarching GEAR UP goals, SDDOE proposed 26 different performance indicators. The 26 performance measures were a mixture of U.S. Ed. performance measures, as required by the Government Performance and Results Act (GPRA) of 1993 (Congress.gov., 1993), and South Dakota's performance measures. U.S. Ed. required 10 performance measures, and the SDDOE imposed the other 16.

Appendix B includes all performance measures from the 2011 South Dakota GEAR UP grant application.

### ***South Dakota GEAR UP Scholarship Component***

South Dakota requested and received a scholarship waiver for the 2011 GEAR UP application. The waiver submitted did not request to provide more than 50% of their federal funding to students. Conversely, it was a scholarship waiver to allocate 0% of their federal funding for student scholarships. The 2011 South Dakota GEAR UP grant stated, “GUSD [GEAR UP South Dakota] is applying for a waiver of the GEAR UP scholarship requirements, as significant scholarship opportunities currently exist for Native American students in South Dakota” (Madsen, 2018, p. 5). The waiver was granted by U.S. Ed.

### ***South Dakota GEAR UP Implementation***

The 2005 and 2011 South Dakota GEAR UP grants used a priority grant model. The U.S. Ed. broadly defines a priority grant as an implementation model in which disconnected students are served under the free or reduced-price lunch or the traditionally underrepresented in postsecondary education qualifications. Both South Dakota GEAR UP grants served students on or near Native American reservations. For this reason, both grants infused cultural elements into their projects.

**Foundational Elements of the 2011 Application.** According to the 2011 GEAR UP grant application, the South Dakota project sought to provide the following services as foundational aspects of their program: advanced curriculum, tutoring and homework assistance, mentoring and advising, and prescriptive catch-up services (M. Wyland, personal communication, December 6, 2021). The application stated that students would

be encouraged to take advanced courses, and the GEAR UP Honors Program would provide rigorous curricula. The GEAR UP Honors Program was an academic camp where students from participating GEAR UP schools lived on a college campus during the summer. Under MCEC's leadership, the Honors Program was 6 weeks long, and under BHSU's leadership, the camp was 3 weeks long.

The 2011 application also proclaimed that the project would provide graduation coaches for tutoring and homework assistance to students before and after school twice a week (M. Wyland, personal communication, December 6, 2021). The graduation coaches were also to provide mentoring and advising to aid students in career and college preparedness. In addition to serving students in Grades 6–12, the graduation coaches provided mentoring to returning scholars or 1st-year postsecondary students via social networks and videoconferencing. Lastly, the 2011 application stated the program would provide Cognitive Guided Instruction to academically deficient students. According to Heinemann (n.d.), an educational organization that publishes resources for instructors, Cognitive Guided Instruction “is a student-centered approach” (para. 1) to math instruction in which the educator asks engaging questions of the student to build upon “intuitive approaches to problem solving” (para. 1). For students struggling academically in English language instruction, the application proposed using Reading Plus software, a digital reading intervention (M. Wyland, personal communication, December 6, 2021).

**Middle School Grade-Specific Enhancements.** Although the program provided the foundational elements previously described to Grades 6–12 of participating partner schools, the 2011 application also listed three grade-specific enhancements: counseling, advising, academic, and career planning; a 2-week middle school summer program; and

high school planning and college awareness (M. Wyland, personal communication, December 6, 2021). The 2011 application declared that students in Grade 8 would receive counseling, advising, and academic and career planning beyond the offerings to all students in Grades 6–12; specifically the application planned for students in Grade 8 to use the Career Cruising computer software program. Career Cruising provided students with career aptitude tests, identified postsecondary schools offering particular programs, and provided practice postsecondary entrance exams.

Other grade-specific enhancements included a 2-week middle school summer program for students in Grades 6–8. During the 2-week middle school summer camp and throughout the year, GEAR UP was to provide high school planning and college awareness. The primary goal of the summer camp was to curb summer slide or student knowledge lost over summer break from the previous school year. In addition, the application noted that students in Grades 6–8 would also use the Career Cruising software. Lastly, the 2011 application proposed high school planning and college awareness for students in Grades 6–8 at participating GEAR UP partner schools. Students were to meet with an academic professional to discuss their future and education goals aspirations

**Middle-to-High School Transition Enhancements.** The 2011 GEAR UP application also stated that the program would offer a middle-to-high school transition program. The transition program was a pilot enhancement for ninth-grade students. Students from select partner schools would benefit from roaming teachers within the middle school to mimic a high school experience. In addition, the proposed program planned to have ninth-grade students during the fall semester spend 4 days a week at their

middle school and 1 day a week at their anticipated high school. During the spring semester, the application indicated that time spent in the high school should increase to 3 days a week with only 2 days at the students' middle school. The application stated that the middle-to-high school transition enhancements were to provide gradual immersion in high school and the opportunity to make high school friends (M. Wyland, personal communication, December 6, 2021).

**High School Grade-Specific Enhancements.** In addition to the three middle school-specific enhancements, the 2011 GEAR UP grant application proposed seven high school enhancements for students in Grades 9–12: (a) a 6-week high school residential summer program; (b) graduation coaches; (c) ACT/SAT preparation; (d) career exploration and planning; (e) college planning, financial aid workshops, and opportunities for federal financial aid; (f) college visits and student shadowing; and (g) 21st Century Scholar Certificates. In the 2005 application, the 6-week residential summer program was called the American Indian Honors Program. In the 2011 application, the program was called the GEAR UP Honors Program. The GEAR UP Honors Program was for students from participating schools entering Grades 9–12 the following school year. The purpose of the Honors Program was to immerse students in a college preparatory program in preparation for the following school year. The application did not describe what made a GEAR UP student eligible to participate.

Graduation coaches were another high school grade-specific enhancement described in the 2011 GEAR UP application. Although also included as a foundational element of the 2011 GEAR UP application for Grades 9–12, graduation coaches were to be assigned a group of approximately 40 students. The graduation coaches were to

develop personal relationships, meet with students at least once a week, provide ongoing mentoring, evaluate student progress, identify potential supports, and assist students in navigating their future via career and college exploration services. Students in Grades 9–12 were also to receive ACT/SAT preparation via the GEAR UP grant. The 2011 application stated that students would receive college entrance exam preparation via the Dakota Interactive Academic Link (DIAL) or DIAL Consortium. MCEC created the DIAL Consortium, and even though MCEC is no longer in operation, its successor, CORE Educational Cooperative, consisting of several of the schools making up MCEC, continues to operate the DIAL Virtual School (n.d.).

The 2011 application also stated that the program would provide career exploration and planning to students in Grades 9–12. To do this, the grant intended to use Career Cruising at least twice a semester in addition to hosting career and college fairs at participating high schools, visiting local businesses and colleges, and presenting professional guest speakers. High school students were also supposed to receive college planning from the program. College planning was to be provided by graduation coaches beginning in ninth grade. Graduation coaches were to positively impact college access and retention by encouraging students to enroll in rigorous courses and by providing academic planning support (M. Wyland, personal communication, December 6, 2021).

The grant also provided financial aid workshops to students as a high school grade-specific enhancement. The 2011 application stated that beginning in ninth grade, GEAR UP students would benefit from financial aid workshops at least once a semester per grade level. The program invited parents to attend. The grant planned to work with the South Dakota College Access Challenge Grant (CACG) to provide financial aid



workshops (M. Wyland, personal communication, December 6, 2021). The CACG was a federal education grant authorized under Part E of Title VII of the Higher Education Act (HEA; Hegji, 2016). The purpose of the program was to “foster partnership among federal, state, and local governments and philanthropic organizations through matching challenge grants that are aimed at increasing the number of low-income students who are prepared to enter and succeed in postsecondary education” (U.S. Ed., 2014, CACG, Program description, para. 1). The SDDOE was awarded a CACG in 2010 for \$1,500,000 (U.S. Ed., 2013). The CACG received its last appropriation in FY 2014 (Hegji, 2016).

In addition to working with the South Dakota CACG to provide financial aid information, the grant intended to work with Lakota Funds to assist in financial aid options (M. Wyland, personal communication, December 6, 2021). Lakota Funds (n.d.) is a microlending community organization that seeks to “promote economic sustainability on the Pine Ridge Reservation and geographic service area, through business loans, technical assistance, and wealth-building education for families and business” (Our Mission). For South Dakota GEAR UP students, Lakota Funds offered Individual Development Accounts, which purported that if students deposited \$25 a month for 24 months, their savings would triple to \$1,800 (M. Wyland, personal communication, December 6, 2021).

The GEAR UP grant offered students in Grades 11 and 12 college visits and student shadowing as high school grade-specific enhancements. The 2011 application stated that junior and senior high school students would benefit from visits to 2- and 4-year colleges twice a year. In addition, the 2011 application indicated that high school students would benefit from shadowing a college student to view what an average day in

college is like (M. Wyland, personal communication, December 6, 2021). Student shadowing included attending college classes, viewing the college housing situations, and participating in campus activities.

Lastly, each GEAR UP student in Grade 12 would receive a 21st Century Scholar Certificate as a high school grade-specific enhancement. The certificate was personalized to each student and detailed all federal financial aid in which the student qualified and estimated scholarship funding (M. Wyland, personal communication, December 6, 2021). The purpose of the 21st Century Scholar Certificate was to ensure all students were aware of their postsecondary educational resources. The 21st Century Scholar Certificate is a required service of the GEAR UP program per the Higher Education Act of 1965.

**High School-to-Postsecondary Transition Enhancements.** In addition to foundational elements, middle school-specific enhancements, middle school-to-high school transition enhancements, and high school-specific enhancements, the 2011 GEAR UP application expanded on the high school-to-postsecondary enhancements provided to participating GEAR UP partner schools. The high school-to-postsecondary transition enhancements included a dual, or concurrent, enrollment program, college orientation and transition, and 1st-year college services. The dual enrollment program involved the facilitation of dual enrollment in high school and college courses for participating GEAR UP high school seniors. The grant planned to aid the work of its IHE partners to offer college orientation and transition to students before their 1st year of college. The application did not explain precisely how the program would provide college orientation and transition.

Graduation coaches were to provide 1st-year postsecondary services by sponsoring events at IHE partner campuses. These events aimed to familiarize students with programs and resources on campus, such as student support services, tutoring, and advising (M. Wyland, personal communication, December 6, 2021). Graduation coaches were also to meet with 1st-year postsecondary students to offer them individualized support. Lastly, the 2011 GEAR UP application stated that the program would provide 1st-year college services and that graduation coaches were to offer 1st-year college services events one time per semester per IHE partner.

### ***South Dakota GEAR UP Match***

The 2005 and 2011 South Dakota GEAR UP grants were not eligible to request match waivers because both applications applied under a state grant. However, had the South Dakota applied for a partnership grant, it may have been eligible for a match waiver, potentially the waiver of 50% for up to 2 years, with possible reapproval every 2 years after that. As a result of applying for a state grant, the SDDOE, the fiscal agent for the GEAR UP grant, was responsible, in principle, for documenting \$31 million in match from 2005 to 2018. Although both South Dakota GEAR UP projects relied primarily on in-kind match throughout their 14-year span, even in-kind match proved hard to produce, likely because of the relatively poor and isolated geographic areas of the state in which the grant operated.

Evidence of South Dakota GEAR UP's problem in obtaining match was apparent after the South Dakota Department of Legislative Audit (DLA) disclosed that MCEC inflated the price of donated software. Microsoft donated the educational software DreamSpark to the South Dakota GEAR UP project. MCEC valued the donated software

as \$4 million in match over 2 years (Kennecke, 2017). In contrast, the DLA valued the DreamSpark software at \$250,000 (Louwagie, 2017). In the ensuing court proceeding *State of South Dakota v. Daniel Guericke* in 2017, after interviewing participating schools and summer program staff, neither the schools nor the staff stated they used the DreamSpark software (Kennecke, 2018). The SDDOE could not use the DreamSpark software as match if there was no recorded use of the software by students. If MCEC, the fiscal agent, could not raise enough match to cover its expenditures, SDDOE was responsible for paying the difference to U.S. Ed.

### **Similar Programs**

GEAR UP is only one of several higher education grants authorized by the HEA of 1965. Specifically, Title IV, Part A, Subpart II of the HEA authorized the GEAR UP grant. Title IV of the HEA largely authorizes programs that are the primary source of federal aid for postsecondary education (Hegji, 2016). Part A of Title IV authorizes early outreach and student services programs with the key differentiating factor: financial assistance does not need to be repaid (Hegji, 2016). Subpart I of Part A details federal Pell grants (Hegji, 2016). Subpart II of Part A authorizes GEAR UP and its sister grant, TRIO (Hegji, 2016).

According to U.S. Ed. (2022a), “The Federal TRIO Programs (TRIO) are Federal outreach and student services programs designed to identify and provide services for individuals from disadvantaged backgrounds” (para. 1). TRIO consists of six discretionary grants, including Talent Search (TS), Upward Bound (UB), Student Support Services (SSS), Ronald E. McNair Postbaccalaureate Achievement Program, Educational Opportunity Centers (EOCs), and staff development (Dortch, 2020; Hegji, 2016). Of

these six programs, TS, UB, and SSS were the first to be authorized by HEA between 1965 and 1968 and thus were named the TRIO programs. Since then, Congress has added more programs under the TRIO umbrella, but the name remains (Dortch, 2020).

Although all six TRIO programs aim to provide financial assistance and support services to low-income, first-generation college students, each program serves a nuanced population in the educational pipeline:

- UB primarily supports the college preparation of secondary students,
- TS primarily supports the postsecondary enrollment of secondary students,
- EOC primarily supports the postsecondary enrollment of adult students,
- SSS primarily supports the completion of undergraduate education,
- McNair primarily supports graduate school preparation, and
- Training supports TRIO staff development. (Dortch, 2020, p. 2)

GEAR UP is similar to TRIO in that it also aims to provide services to low-income and disadvantaged individuals. The TRIO grant is unique in that it targets first-generation college students and individuals with disabilities. Although eligibility depends upon the specific program, most recipients of the TRIO grant programs include IHEs and public and private organizations (U.S. Ed., 2022a). Although GEAR UP is inclusive of these groups, GEAR UP does not focus on them specifically.

### **UB Program**

The UB program is the first step in the TRIO educational pipeline, which seeks to prepare and encourage students to succeed in secondary school (Dortch, 2020).

Sometimes TRIO may be referred to as having eight programs total because there are two subsidiary UB programs titled Upward Bound Math and Science (UBMS) and Veterans

Upward Bound (VUB). As their names suggest, UBMS “prepares high school students for postsecondary education programs that lead to careers in the fields of math and science, and VUB to assist military veterans to prepare for a program of postsecondary education” (Dortch, 2020, p. 2). The duration of all UB grants is 5 years (U.S. Ed., 2022d).

Regular UB seeks to serve students between the ages of 13 and 19 (Dortch, 2020). A unique component of the Regular UB and UBMS grants compared to other TRIO programs and GEAR UP is that the grantees may provide work study to participants (Dortch, 2020). According to the Congressional Research Service, “In FY2019 on average, Regular UB, UBMS, and VUB projects expended \$4,854, \$4,818, and \$2,337 per participant, respectively” (Dortch, 2020, p. 3). Of note, per-student spending for the Regular UB and UBMS programs is, on average, at least eight times higher than TS and EOC projects (Dortch, 2020). Neither Regular UB, UBMS, nor VUB have a cost sharing or matching component to their programs.

### **TS Program**

The TS program is the next step in the TRIO education pipeline. The TS program aims to provide academic services to older individuals who wish to enter, complete, or reenter secondary or postsecondary education (Dortch, 2020). TS provides services to individuals between ages 11 and 27 (Dortch, 2020; Hegji, 2016; Kuenzi, 2005). Two thirds of the students served by TS must be low-income, first-generation college students (Hegji, 2016). Academic services provided by TS include but are not limited to “assistance with admissions and financial aid applications ... guidance and assistance to individuals for reentering secondary school or entering general educational development

(GED) ... [and] personal and career counseling” (Kuenzi, 2005, CSR-2). In FY 2019, TS spent \$580 per participant. The duration of all TS grants is 5 years, and the program does not require cost sharing (U.S. Ed., 2020).

### **EOCs**

EOCs are the third step in the TRIO educational pipeline. Unlike other TRIO programs, EOCs are not required to provide certain activities but must report on the number of participants applying for college admission, financial aid, postsecondary enrollment, and completion (Dortch, 2020). EOCs serve individuals aged 19 years or older, a distinction from TS (Dortch, 2020). The performance period of EOCs is 5 years with a typical grant award of \$370,458 (U.S. Ed., 2011a). EOCs receive the lowest funding of the TRIO programs at \$280 per student in FY 2019 (Dortch, 2020). The EOC program does not require cost sharing (U.S. Ed., 2011a).

### **SSS Program**

The SSS program is the fourth step in the TRIO educational pipeline but was one of the three original TRIO programs authorized by the HEA (Dortch, 2020). Only IHEs or a combination of IHEs are eligible to receive the SSS program for “college students with the aim of improving their retention, graduation rates, financial and economic literacy, and transfers from two-year to four-year schools” (Dortch, 2020, p. 8). The SSS program requires grantees to provide certain activities, such as academic tutoring, postsecondary course selection, and assistance completing the Free Application for Federal Student Aid (U.S. Ed., 2011b). There are other services the SSS program awardees may provide, such as exposure to cultural events, mentoring programs, and securing temporary housing during breaks in the academic year (U.S. Ed., 2011b). All

SSS grants receive 5 years of funding (U.S. Ed., 2011b). In FY 2019, SSS projects spent \$1,667 per student (Dortch, 2020). The estimated dollar amount per award is \$290,949, and cost sharing is required only if the grantee chooses to provide grants or stipends to students (U.S. Ed., 2011b).

### **Ronald E. McNair Postbaccalaureate Achievement**

The McNair grant is the last in the TRIO educational pipeline. The McNair grant's mission is to "help prepare disadvantaged college students for subsequent doctoral study by providing research opportunities, internships, counseling, tutoring, and other preparatory activities" (Dortch, 2020, p. 10). Only IHEs or a combination of IHEs are eligible to apply for the McNair grant program. The grant recipients receive funding for 5 years, and there is no cost-share requirement for the grant (U.S. Ed., 2017). The average award is approximately \$220,000 per year, and U.S. Ed. (2017) must award the McNair grant to a minimum of 24 students per year. Projects may provide up to \$2,800 to students annually in stipends (Dortch, 2020). In FY 2019, McNair projects spent \$9,544 per student (Dortch, 2020).

### **Staff Development**

The final TRIO program is the TRIO Staff Development (training) program. The staff development program is a 2-year grant available to IHEs and nonprofits (Dortch, 2020). The program covers training costs for TRIO personnel (Dortch, 2020). Some of the allowable costs of the program include conferences, transportation, lodging, and speaker fees (Dortch, 2020). The average award is \$348,250, and there is no cost-sharing requirement for the grant (U.S. Ed., 2011c).



## **TRIO in South Dakota**

The researcher reviewed TRIO grant awards in South Dakota between 2011 and 2020. During that time, no entity within South Dakota received funding for EOCs or the McNair grant programs. The most popular grant, the SSS program, has been awarded to four of South Dakota's six regental institutions: BHSU, Northern State University, South Dakota State University, and the University of South Dakota. U.S. Ed. awarded the SSS program to one private South Dakota university, Dakota Wesleyan University, and two of three South Dakota tribal colleges, Oglala Lakota College and Sisseton Wahpeton Community College. Several of these postsecondary schools have received three consecutive 5-year awards.

The next most common award in South Dakota is Regular UB. Four of South Dakota's six regental institutions, BHSU, Northern State University, South Dakota State University, and the University of South Dakota, have received this grant. No private university or tribal college has received the UB grant despite being eligible. In addition, between 2011 and 2020, no entity within South Dakota has received the UBMS nor VUB grants. TS was the least commonly awarded grant in South Dakota between 2012 and 2020. The University of South Dakota was the only university on record having received the TS grant during this time. U.S. Ed. did not have data available on the TS grant listed before 2012. Table 6 contains a complete list of TRIO grants received by postsecondary schools in South Dakota.

## **Criticism of the GEAR UP Grant**

One obvious criticism of the GEAR UP grant is its considerable overlap with the various TRIO programs. GEAR UP and TS appear to be most similar (Burd, 2011).

According to a blog post written in 2011 by Stephen Burd of the think tank New America, the Clinton administration created the GEAR UP program in 1998 because some members of Congress felt the TS program “was too limited in its scope and reach” (para. 4). Although Congress created GEAR UP to correct some of the concerns identified by TS, both grants suffer from annual funding issues. Depending on the current administration’s funding priorities, one or both programs may receive a cut or level funding (Burd, 2011). Although a significant increase in funding for one program may appear to be a public benefit, it may be at the expense of the other program because both grants compete for funding from the same appropriations legislation (Burd, 2011).

Aside from the similarity to the TRIO programs and annual funding problems, some critics take issue with the age of students served by the GEAR UP grant. In the cohort model, GEAR UP grantees serve students “beginning no later than the seventh grade” (U.S. Ed., 2022c, para. 1). Several studies have shown that educational outcomes depend heavily on early childhood education efforts. Critics of the GEAR UP grant argue that federal grant programs should emphasize supplemental educational supports earlier in childhood development, especially for students living in poverty (Nold et al., 2021).

**Table 6***TRIO Awards in South Dakota*

Program	Black Hills State University <sup>a</sup>	Dakota Wesleyan University <sup>b</sup>	Oglala Community College <sup>c</sup>	Northern State University <sup>a</sup>	Sisseton Wahpeton Community College <sup>c</sup>	South Dakota State University <sup>a</sup>	University of South Dakota <sup>a</sup>
UB	X			X		X	X
TS							X
EOC							
SSS	X	X	X	X	X	X	X
McNair							
Staff development							



*Note.* UB = Upward Bound; TS = Talent Search; EOC = Educational Opportunity Centers; SSS = Student Support Services.

<sup>a</sup> = One of South Dakota's six regental institutions. <sup>b</sup> = Private university. <sup>c</sup> = Tribal college.

Other grant critics take issue with the program's outcomes or lack thereof.

Although the GEAR UP grant's overarching goal is to increase the number of students who enroll and succeed in postsecondary education, GEAR UP has difficulty determining correlation versus causation. In an article written on GEAR UP by Lozano et al. (2009), the findings indicated no differences in educational aspirations of Hispanic students in a south Texas high school who participated in college access preparatory programs and those who did not. It is possible that high-achieving, low-income students would seek supplemental services regardless of the existence of the GEAR UP grant.

Although U.S. Ed. develops a certain number of performance measures as required by the GPRA and based on the current department's and administration's priorities, projects may also add their own performance measures. Furthermore, there appears to be a "sweet spot" regarding a project's performance measures on an individual project basis. It behooves grantees to develop performance measures that are accessible enough to demonstrate progress in achieving the measure but are lofty enough not to accomplish it in its entirety. To complete the partially achieved goals, a grantee may still reasonably apply for future GEAR UP grant funding.

Even if the GPRA indicators appear to solve this issue, as all projects must work toward achieving the GPRA performance measures, it is far from a perfect solution. Universality and definition of terms are some challenges grantees face regarding the performance measures. For example, during the 2011 GEAR UP grant competition, grantees were required to incorporate Performance Measure 1.3 (see Appendix B). Because there is a variety of secondary schools in the GEAR UP program, such as charter

schools, public secondary schools, private secondary schools, and Bureau of Indian Education schools, the term *specific class* names may not be used universally.

Other questions arise concerning the completion of the performance measures. Frequently there are two parts to courses per semester. For example, a student may pass the first semester of pre-algebra but not the second semester. In addition, if a project meets a performance measure in 1 year of its entire 6 or 7 years, it is unclear whether a grantee has completed the measure. Perhaps the percentage of students who pass pre-algebra by the end of the eighth grade increased by 10% over the baseline in year 6 of the performance period but only increased by 9% over the baseline in year 7, the final year of the grant. These ambiguities make comparisons among projects challenging and question the program's effectiveness.

### **COVID-19 Impacts**

On January 20, 2020, the CDC (n.d.) confirmed the first case of COVID-19 in the United States. This new pandemic transformed seemingly every aspect of life, including U.S. Ed.'s cost-share regulations. On December 3, 2020, the Office of Postsecondary Education (OPE) issued a letter regarding match waiver flexibilities. U.S. Ed. superseded the December 3, 2020, letter with a letter dated March 25, 2021. The December 3, 2020, letter invited state grantees to participate in the existing match waivers available to partnership grantees. Partnership grantees could request one of three match waivers at the time of application, with the most significant waiver of up to 75% of the match requirement for 2 years. The researcher included the complete December 3, 2020, letter from U.S. Ed. in Appendix C.

The subsequent letter, dated March 25, 2021, invited all GEAR UP grantees, both state and partnership, to request waivers of up to 100% of matching requirements because of the national emergency of the COVID-19 pandemic. As detailed in the letter, waivers were subject to criteria and limitations. First, grantees had to submit a forthcoming form to their GEAR UP program specialist. All grantees were assigned one U.S. Ed. program specialist, allocated by state, whom they could contact for questions or concerns involving their grant. The second criterion was that all waivers would end no later than September 30, 2022. U.S. Ed. selected this date because of the projected end date of the COVID-19 national emergency. Third, waivers would only be granted by U.S. Ed. given the grantees certified to the maximum extent practicable that they would continue to serve the same number of students initially projected and maintain the quality and intensity of the services they provide. The last limitation applied to state grants only. The fourth criterion stated that if state grantees provided scholarships to students, they would continue to provide those scholarships. Appendix D contains the complete March 25, 2021, letter.

U.S. Ed. subsequently developed the match waiver request form, which contained three sections. In the first section of the form, grantees detail the amount of match waiver they are requesting. The form requires the total award of the project, the project start date, the project end date, the total number of days in the project, the daily match requirement, the requested start date of the waiver, and the requested end date of the waiver. U.S. Ed. allowed projects to retroactively request a waiver from March 13, 2020, the date the COVID-19 pandemic was declared a national emergency, through September 30, 2022, the anticipated national emergency end date. Section 2 required projects to specify the

percentage of the matching requirement they were requesting a waiver. Lastly, Section 3 included certifications. Project administrators were required to certify that they understood the waiver was time limited, they would continue to serve the same number of students and maintain the quality and intensity of services provided, and they would continue to comply with the scholarship component if applicable. The complete match waiver request form is shown in Appendix E.

### **Theoretical Implications**

The woes of public administration, namely red tape, have been discussed by public administrators at length as early as 1887 (Wilson, 1887). However, it was not until the last half of the 20th century that theorists attempted to typify bureaucratic encounters in a nuanced way. Perhaps the most well-known literature on the subject comes from Herbert Kaufman's book *Red Tape: Its Origins, Uses and Abuses* written in 1977. Although Kaufman (1977) never explicitly defined the term red tape, he captured the sentiment. Kaufman stated, "When people rail against red tape, they mean that they are subjected to too many constraints, that many of the constraints seem pointless, and that agencies seem to take forever to act" (pp. 4–5). Despite the negative connotation the term embodies, not all rules and procedures deemed red tape are that. Waldo (1946) said, "One man's red tape is another man's system" (p. 399). In other words, what one person perceives as a meaningless control, another individual may believe as an appropriate safeguard.

In 1976, Kahn et al. sought to define and distinguish encounters involving bureaucracy by conceptualizing a groundbreaking framework. The framework consists of a square divided into four quadrants. The quadrants illustrate the type of person initiating

the interaction, bureaucrat or nonbureaucrat, and the type receiving the transaction, bureaucrat or nonbureaucrat (Heinrich, 2016). The four resulting cells are as follows (see also Figure 2):

- I. Organizational behavior, where the person initiating the transaction and the person at whom it is directed are within the organization;
- II. Bureaucratic encounters where the person initiating the transaction is outside the organization to which that transaction is directed (e.g., an individual applying for public welfare benefits);
- III. Bureaucratic encounters where the person initiating the transaction is inside the organization and it is directed toward individuals outside the organization (e.g., law enforcement); and
- IV. Transactions where both the initiator and the person at whom it is directed are outside the organization. (Heinrich, 2016, p. 404)

As the framework exhibits, although there are four different types of bureaucratic encounters, most of the literature has been written on the traditional definitions of red tape, typically quadrants two and three, which represent transactions in which one member of each party is present. Moreover, in addition to the growing literature on the refinement of bureaucratic encounters that may contribute to red tape, public administrators also have begun honing its causation.



**Figure 2**

*Kahn et al.'s Bureaucratic Encounters*

	Intra.-Org.	Extra.-Org.
Intra.-Org.	<b>I.</b> Organizational behavior (leadership, peer relations, etc.)	<b>II.</b> Bureaucratic encounters (service, client relations, admissions, compensation, etc.)
Extra.-Org.	<b>III.</b> Bureaucratic encounters (law enforcement, taxation, sales, outreach, etc.)	<b>IV.</b> Transactions (family relations, friendships, neighborhood relations, etc.)

*Note.* Adapted from “The Bite of Administrative Burden: A Theoretical and Empirical Investigation,” by C. J. Heinrich, 2016, *Journal of Public Administration Research and Theory*, 26(3), p. 404 (<https://doi.org/10.1093/jopart/muv034>).

### **Rules Born Bad**

In 1993, Barry Bozeman described the etiology of red tape and asserted there are two origins of red tape: “Rules Born Bad” and “Good Rules Gone Bad” (p. 285). As the name implies, rules born bad are those rules that were bad from inception for various reasons. The five reasons rules are born bad include (a) inadequate comprehension, (b) self-aggrandizement and illegitimate functions, (c) negative sum compromise, (d) overcontrol, and (e) negative sum process. Table 7 summarizes the rule categories.

**Table 7***Bozeman's Etiology of Red Tape*

Rule-evolved red tape	Rule-inception red tape
Rule drift	Inadequate comprehension
Rule entropy	Self-aggrandizement and illegitimate functions
Change in implementation	Negative sum compromise
Change in functional object	Overcontrol
Change in the rule's efficacy	Negative sum process
Rule strain	
Accretion	
Misapplication	

Note. Adapted from "A Theory of Government "Red Tape," by B. Bozeman, 1993, *Journal of Public Administration Research and Theory*, 3(3), pp. 285–289.

### ***Inadequate Comprehension***

Bozeman (1993) stated that some rules are dysfunctional from the beginning because the individuals designing the rule do not have adequate comprehension of the subject. In addition, Bozeman asserted that entities promulgate all rules under the assumption of causal theory. Rules are promulgated based upon the forecasted behavior modified by the rule. Frequently, public administrators deal with "wicked problems." Wicked problems, coined by Horst Rittel and Melvin Webber in 1973, are unique planning and social problems with unclear aims or solutions. Wicked problems have 10 distinctive characteristics:

1. There is no definitive formulation of a wicked problem.
2. Wicked problems have no stopping rule.
3. Solutions to wicked problems are not true-or-false, but good-or-bad.
4. There is no immediate and no ultimate test of a solution to a wicked problem.

5. Every solution to a wicked problem is a ‘one-shot operation’; because there is no opportunity to learn by trial-and-error, every attempt counts significantly.
6. Wicked problems do not have an enumerable (or an exhaustively describable) set of potential solutions, nor is there a well-described set of permissible operations that may be incorporated into the plan.
7. Every wicked problem is essentially unique.
8. Every wicked problem can be considered to be a symptom of another problem.
9. The existence of a discrepancy representing a wicked problem can be explained in numerous ways. The choice of explanation determines the nature of the problem’s resolution.
10. The planner has no right to be wrong. (Rittel & Webber, 1973, pp. 161–166)

If a rule attempts to solve or modify the behavior of a specific wicked problem, the rule may be inadvertently alter the behavior involving another wicked problem. Inadequate comprehension of a problem by an individual such as promulgating a rule to solve a wicked problem can only result in a rule born bad.

### ***Self-Aggrandizement and Illegitimate Functions***

As the name suggests, promulgated rules are born bad if they serve illegitimate functions such as self-aggrandizement. Bozeman (1993) asserted, “The concept of red tape employed here assumes that rules should serve a legitimate, organizationally sanctioned functional object, either for the focal organization or for a legitimate external controller (such as a parent agency) of the organization” (p. 286). A rule that is effective

but does not serve a legitimate purpose is still considered red tape because it produces an unnecessary compliance burden.

### ***Negative Sum Compromise***

A rule is born bad if it is a negative sum compromise. Bozeman (1993) described a negative sum compromise as “a rule ... that serves so many diverse functional objectives that the net result is to produce a compliance burden but not enhance any of the functional objects it is designed to serve” (pp. 286–287). In other words, a negative sum compromise is a rule that attempts to solve several issues but ultimately solves none. Bozeman contended that negative sum compromises are also often a symptom of inadequate comprehension. With negative sum compromises, each rulemaking party claims the rule solves a problem, but the rulemaking parties do not consider the rule’s effect overall.

### ***Overcontrol***

Bozeman (1993) stated that of all the reasons rules are born bad, overcontrol is the most common. Bozeman also stated that although managerial control is a legitimate and important organizational value, organizations frequently overemphasize it. Bozeman contended, “Rules cannot cover every contingency” (p. 287). Thus, some discretion is necessary. Sociologist Robert Dubin (1951, as cited in Bozeman, 1993) stated, “The informal organization, under some circumstance, can even ‘preserve the organization from the self-destruction that would result from literal obedience to the formal policies, rules, regulations and procedures’” (p. 287). Stated differently, a rule that controls too much can make well-intentioned bureaucrats ineffective.

### ***Negative Sum Process***

A core value of democratic governments is civic participation; however, Bozeman (1993) argued that this value is often taken to the extreme. Organizations often desire all stakeholders to participate in the rulemaking process, despite the party's lack of desire to participate. Coercing participants to be engaged in a process they do not wish to participate in can create a rule born bad.

### **Good Rules Gone Bad**

However, not all rules are born bad. Bozeman (1993) stated that some rules, functional at inception, convert into red tape for various reasons. These eight reasons include (a) rule drift, (b) rule entropy, (c) change in implementation, (d) change in the functional object, (e) change in the rule's efficacy, (f) rule strain, (g) accretion, and (h) misapplication.

### ***Rule Drift***

According to Bozeman (1993), rule drift occurs when an organization creates a rule for a functional purpose. However, the rule goes bad because those instituting it do not understand its objective. Rule drift can happen when the reason the organization created the rule is no longer applicable. Although rule drift frequently arises because of the passage of time, Bozeman cautioned that this is not the only cause of rule drift. Turnover in staff, changes in client composition, and a reorganization can also cause rule drift. Although previous personnel may have understood the rule's purpose, newer staff may be blindly enforcing the rule without evaluating the rule's effectiveness.

### ***Rule Entropy***

Although similar to rule drift, rule entropy is a special case of rule drift. According to Bozeman (1993), rule entropy occurs when “rules get passed from one organization to the next and one person to the next” (p. 288). The greater the number and types of jurisdictions involved in the promulgation and enforcement of a rule, the more the rule becomes muddled and seemingly haphazard.

### ***Change in Implementation***

As its name suggests, a good rule can go bad because of a change in implementation. Even though the rule itself remains the same, a change of implementation can ensue when it is implemented by the entity differently based on discretion. The entity can enforce the rule more or less stringently than in the past, causing a good rule to go bad.

### ***Change in the Functional Object***

Good rules can become bad when there is a change in the functional object. Change can render a rule obsolete or useless (Bozeman, 1993).

### ***Change in the Rule's Efficacy***

A rule is born good but goes bad if the rule's efficacy changes. An altered rule's efficacy may change even if the functional object remains the same.

### ***Rule Strain***

Good rules can turn bad if there are too many rules to which one organization must adhere. In other words, too many rules with a high compliance burden can ultimately render an organization ineffective at complying with any of the rules properly. Bozeman (1993) defined rule density as “the total resources devoted by the organization

to complying (i.e., compliance burden) with all its rules, regulations, and procedures (i.e., its rule sum) as a percentage of total resources expended by the organization” (p. 281).

### ***Accretion***

Rules can be born good but go bad if the rules, in sum, make the other rules useless. Bozeman (1993) stated accretions are different from rule strain because even though there are several rules, the content of the rules themselves rather than the number of rules is the issue.

### ***Misapplication***

Lastly, a rule can be born good but turn bad because of misapplication. Misapplication can occur on both sides of the rule. Both the enforcer of the rule and the individual expected to comply with it may not understand its purpose. Although the rule’s intent is good, “sometimes rules may be difficult to interpret or apply because they have been written poorly and thus quickly evolve into red tape” (Bozeman, 1993, p. 289).

### **Summary**

This study was organized into five parts. Chapter 1 of this study included the background, statement of the research program, purpose statement, research questions, significance of the program, and definitions. Chapter 2 included the literature review that explained the history of GEAR UP, similar programs, criticisms of the GEAR UP grant, COVID-19 impacts, and the theoretical implications. Chapter 3 consists of the methodology that describes the research design and research instruments and presents the methods of data analysis. The methodology also discusses assumptions and limitations as well as the ethical procedures taken.

## CHAPTER 3: METHODOLOGY

This study aimed to determine whether the cost-share requirement of the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant places an inordinate burden on educational organizations in applying for and successfully administering the grant. If it was determined the administrative burden of the grant is exorbitant, this study sought to determine to what extent. This study used a mixed methods explanatory sequential research design to build upon a similar study that used a quantitative design only. The researcher employed an electronic survey to collect the quantitative data, followed by virtual interviews. The two data sets were analyzed and presented separately, but the researcher coalesced the data to explain how the qualitative information expanded upon the quantitative results. Limitations of this research design included the necessity of using the same sample for both data sets and the possibility that the researcher may have neglect to examine an important finding. The researcher advises that the results of this study may not be generalized to all federal grants because this study concentrated on one specific education grant, and the researcher did not consider the diversity of all federal grants with matching requirements.

### **Purpose Statement**

This study had two short-term goals. First, this study sought to determine whether the cost-share component of the GEAR UP grant is so burdensome it prevents educational organizations from applying for and successfully administering an award, and second, if the matching requirement of the grant was found to be detrimental to the grant's purpose, this study sought to determine to what extent.



The researcher's desire was to fill the gap in the literature on the GEAR UP grant in general as well as add value to the greater conversation concerning cost-share requirements of federal grants. In addition, the researcher hopes that educational organizations may use her research as reasons as to why a match waiver is necessary for a competitive and successful GEAR UP grant. Finally, the researcher wishes that this study might encourage the federal government to reexamine, and perhaps even eliminate, cost-share requirements for all federal discretionary grants.

### **Research Questions**

The researcher used the following research questions to determine whether the cost-share requirement of the grant is an unreasonable administrative condition:

1. To what extent does the cost-share requirement of the GEAR UP grant affect organizations' desire to apply?
2. Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?
3. To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?
4. Is the cost-share component of the GEAR UP grant a programmatic benefit or programmatic limitation?

The research questions build on Hall's (2010) research, which determined that federal economic development grants with matching requirements disproportionately burdened nonmetropolitan counties in three southern states. However, Hall's research found that nonmetropolitan status alone was not the sole factor determining burden. Hall discovered that geographic isolation, per capita income of the community, and few resources needing

to stretch over extensive areas are more indicative of burden than population alone. The cost-share requirement of the GEAR UP grant may unintentionally prevent educational organizations from providing more quality services to low-income students.

### **Research Design**

This study used a mixed methods research design, specifically an explanatory sequential approach, to build upon Hall's (2010) study. Hall used an exclusively quantitative approach in his study. According to Creswell and Creswell (2018), "The overall intent of [mixed methods] design is to have the qualitative data help explain in more detail the initial quantitative results" (p. 222). This researcher hypothesized that her study would confirm Hall's (2010) results and provide richer, qualitative data to explain her findings using a mixed methods design.

The researcher used a mixed methods design to divide her quantitative participants into two groups. Dependent upon the participants' answers, one group consisted of the GEAR UP project directors who perceived the cost-share component of the GEAR UP grant as a programmatic benefit, and the other group consisted of those who believed it is a programmatic limitation. The researcher operationalized programmatic benefit as the obligations of the grant administrator who contributes to the short- and long-term goals and objectives of the grant itself. Programmatic benefits more directly aid the grant's recipients. Programmatic limitations are the obligations of the grant administrator that contribute to the administrative objectives of the grant itself and indirectly aid the grant recipients.

Next, the researcher interviewed the quantitative survey participants who believed the cost-share requirement is a programmatic limitation. The researcher used qualitative

interviews to determine how the matching component of the grant relates to Bozeman's (1993) rule etiology. The researcher ascertained whether project directors believed that the cost-share component of the grant was initially a programmatic benefit that became a programmatic limitation. In other words, the researcher determined whether GEAR UP cost-share is a good rule gone bad or whether the matching requirement was, from its genesis, a rule born bad.

### **Population**

According to Thacker (2020), "A population is a complete set of people with specified characteristics" (p. 3). The GEAR UP grant uses two types of awards: state grants and partnership grants. According to NCCEP (n.d.), in 2022, there were 35 state GEAR UP grantees and 121 partnership GEAR UP grantees, and according to NCCEP's website, it "is a national association dedicated to supporting underserved students as they pursue postsecondary education" ("Who We Are" section). Founded in 1999 by the Ford and W. K. Kellogg Foundations, NCCEP was created shortly after the inception of the GEAR UP grant. Since then, NCCEP has acted as a liaison between U.S. Ed. and the GEAR UP grant administrators. NCCEP's mission reads as follows:

We build the capacity of communities to ensure that underserved students have the opportunity, skills, and knowledge to successfully pursue the education and training that will enable them to achieve their career and life goals. We work towards a future where all students are empowered and equipped with the education and training needed to succeed in a diverse and global society. ("Our Mission")

NCCEP provides the GEAR UP community with professional development and technical assistance.

The researcher used the 121 active partnership grantees as her population. To receive a partnership grant, an eligible application must consist of one or more local educational agencies (LEAs), one or more institutions of higher education (IHE), and “not less than two other community organizations or entities, such as businesses, professional organizations, State agencies ... or other public or private agencies or organizations” (U.S. Ed., 2019a, “Eligibility” section). Therefore, the primary applicant for a partnership grant may be an LEA, an IHE, or a state agency. Specifically, the researcher gathered quantitative data from the project director of the partnership grant.

However, Thacker (2020) qualified that there are two kinds of populations: target population and accessible population. According to Thacker, “The accessible population is exactly what it sounds like, the subset of the target population that we can easily get our hands on to conduct our research” (p. 3). The researcher used NCCEP’s email database to distribute her quantitative survey. Appendix F includes the Memorandum of Understand between NCCEP and the researcher for her use of NCCEP’s distribution list. Although the researcher’s target population was 121 partnership grantees, the accessible population was determined by the individuals in NCCEP’s email database.

### **Sample**

According to Thacker (2020), “A sample is a subset of the population” (p. 3). The researcher used the Raosoft sample size calculator to determine the appropriate sample size. It is important to calculate the number of participants required for a research study to ensure the sample size is statistically significant. The appropriate sample size is based

on various confidence levels and margins of error. A confidence level signifies the accuracy of the results. A margin of error, usually denoted by a percentage, establishes the difference in a certain result compared to the entire population. In other words, the margin of error accounts for variability between the actual result and the projected result.

For this study, the researcher included the total population to determine the sample size needed at several confidence levels assuming a 5% margin of error. The researcher calculated a sample size with a 5% margin of error and 90%, 95%, and 99% confidence levels. The Raosoft sample size calculator indicated the researcher needs 84 project directors' responses for a 90% confidence level, 93 project directors for a 95% confidence level, and 103 project directors for a 99% confidence level, all with a 5% margin of error.

### **Quantitative Instrument**

The researcher used a mixed methods, explanatory sequential design for her methodology. Creswell and Creswell (2018) stated that for an explanatory sequential research design, "A typical procedure might involve collecting survey data in the first phase, analyzing the data, and then following up with qualitative interviews to help explain confusing, contradictory, or unusual survey responses" (p. 222). This researcher followed the typical explanatory sequential procedure with her instrumentation.

The researcher used the digital survey instrument Qualtrics to gather participant responses. The survey consisted of 15 questions, including informed consent. The first 10 questions collected demographic data about the participant and the GEAR UP project. These questions solicited responses concerning the participant's job title, number of years with the program, program title, type of grant, location, year of the performance period,

and history of a match waiver. Next, the survey used a Likert scale to determine the experienced burden by the GEAR UP projects concerning match. The next four questions consisted of Likert scale-type questions about the matching component of the GEAR UP grant. The survey's final question requested the participant to estimate the time spent on obtaining and tracking match. The survey also asked the participants whether they would be willing to participate in a follow-up interview at a later date.

The purpose of this methodology was first to determine, using the quantitative survey, whether project directors felt the cost-share requirement is a programmatic benefit of the grant or a programmatic limitation. Based on the project directors' responses, the researcher assembled two groups. One group consisted of those who felt the grant's cost-share component is a programmatic benefit. The other group consisted of project directors who felt the cost-share requirement is a programmatic limitation. The researcher then interviewed those project directors who matched the group believing it to be a programmatic limitation.

### **Quantitative Pilot Study**

The researcher conducted a pilot study for both the quantitative and qualitative portions of her research. According to van Teijlingen and Hundley (2001), in social science research, the term *pilot study* can be used one of two ways. Pilot studies can be used to describe feasibility studies, which are "small scale versions, or trial runs, done in preparation for the major study," or it can be used to describe a preliminary testing of a certain research instrument (Polit et al., 2001, p. 467). Regarding the quantitative data for this study, the researcher used a pilot study to test her survey instrument. Participants in her pilot study included those with little knowledge of the GEAR UP grant to those with

much knowledge of the GEAR UP grant. The pilot study provided feedback to the researcher concerning the usability of the survey instrument. Based on the results of the quantitative pilot study, the researcher amended her instrument as necessary.

### **Quantitative Data Collection**

Because of the mixed methods design, the researcher gathered her data in two phases. For the quantitative phase of data collection, the researcher used NCCEP's mailing list. The mailing list contained email addresses of those GEAR UP personnel interested in receiving the national newsletter, the *GEAR UP Digest*. The *GEAR UP Digest* contained a link to the researcher's quantitative survey encouraging partnership project grantees to take the survey. NCCEP also posted the quantitative survey link on its social media sites, namely Twitter and Facebook. One week after distribution, NCCEP sent a reminder email containing the quantitative survey link. Finally, NCCEP sent a third and final email containing the researcher's quantitative survey.

### **Quantitative Data Analysis**

In an explanatory sequential research design, the quantitative and qualitative data analysis are performed separately (Creswell & Creswell, 2018). This cadence is purposeful because the qualitative interviews use the quantitative data analysis to develop the interview questions. In terms of interpretation, although it may be assumed the researcher compared the two data sets, this is not the case (Creswell & Creswell, 2018). After the researcher provided an explanation of both data sets, she then explained how the qualitative data specifically expounded on the quantitative results. The researcher followed this guide for data analysis.

The researcher first analyzed the quantitative results of her survey. Because the quantitative survey had both demographic and Likert scale questions, the researcher analyzed these two different data sets. The researcher provided a snapshot of the demographic data first using charts and graphs as necessary. The researcher then analyzed the Likert scale data. Each option on the Likert scale was assigned a value between negative 2 and positive 2. The Likert scale data divided participants into two groups using a significant deviation of the average. An average above 0 indicated the participant believes match to be a programmatic benefit. An average below 0 indicated the participant believes the cost-share requirement of the grant is a programmatic limitation.

### **Qualitative Instrument**

The researcher conducted qualitative interviews with those participants who believe cost-share is a programmatic limitation. Participants were project directors of GEAR UP partnership grants. The qualitative instrument consisted of nine interview questions. The interview questions asked GEAR UP staff to explain how they felt their projects could provide more quality services for students and families if the GEAR UP match requirement did not exist. The next five questions pertained to gathering match for the program. One question asked what effect COVID-19 on their grant. The final question allowed the participants to share with the researcher anything they desired regarding the GEAR UP grant.

### **Qualitative Pilot Study**

The researcher conducted a qualitative pilot study interviewing two individuals who had significant understanding of the GEAR UP grant, which enabled the researcher



to receive content-based feedback concerning her research questions as well as anticipate how participants would answer. According to Williams-McBean (2019), qualitative pilot studies are helpful to increase the confidence of researchers, especially novice researchers, as well as enhance the credibility of the study. In addition, conducting a pilot study allowed the researcher to determine the approximate length of interview and allowed for a couple of trial runs of the interview. The qualitative pilot study also helped the researcher test the technology needed to conduct and record virtual interviews.

### **Qualitative Data Collection**

The researcher solicited qualitative data via semistructured interviews from individuals who participated in the quantitative data collection. According to Dahlberg and McCaig (2010), semistructured interviews typically use a list of questions drafted by the researcher, and the questions are generally asked in the same order. However, semistructured interviews allow for flexibility by permitting the researcher to change the order of the questions or use different wording “to achieve a more natural style of conversation” (Dahlberg & McCaig, 2010, p. 119). The final question on the quantitative survey asked participants to provide their email address if they were interested in participating in a follow-up interview at a later date. The researcher contacted those individuals who provided their contact information. The researcher conducted the interviews shortly after the quantitative survey so that participants were able to recall the way in which they answered the quantitative survey and why. The interviews took approximately 15–30 min.

## **Qualitative Data Analysis**

The researcher recorded all interviews and transcribed them with a third-party software. After transcribing the interviews, the researcher coded and organized the data to gain familiarity. The researcher used thematic data analysis to identify patterns and themes in the interviews. Thematic data analysis and content data analysis are often used interchangeably. According to Vaismoradi et al. (2013), content analysis “is a systematic coding and categorizing approach used for exploring large amounts of textual information unobtrusively to determine trends and patterns of words used, their frequency, their relationships, and the structures and discourses of communication” (p. 400). Conversely, thematic analysis “involves the search for and identification of common threads that extend across an entire interview or set of interviews” (Vaismoradi et al., 2013, p. 400). Content analysis aims to quantify the qualitative data by identifying patterns based on frequency, and thematic analysis allows for a greater qualification of the data by “offering the systematic element characteristic of content analysis, and also permits the researcher to combine analysis of their meaning within their particular context” (Vaismoradi et al., 2013, p. 401). After considering both types of data analysis, the researcher used thematic analysis.

## **Limitations**

One limitation of an explanatory sequential design is that there is discretion as to what quantitative findings from the qualitative interviews the researcher chooses to expand upon. The researcher may focus on a specific outcome of the study and disregard other findings (Creswell & Creswell, 2018). For this study, this limitation paired with the

researcher's previous experience as a state director of the South Dakota GEAR UP grant may have made it difficult to keep biases and assumptions in control.

Furthermore, the generalizability of this study was limited. Although the results of this study may confirm Hall's (2010) findings and the trend of this subject matter may lean toward a disproportionate burden for organizations located in nonmetropolitan communities, these two studies explored only two types of federal grants with matching requirements, a specific education grant and economic development grants covering a relatively small geographic area. The results of this study are not all-inclusive of every federal grant with their unique distinctions. There are likely hundreds, if not thousands, of various federal grants with matching requirements.

### **Assumptions**

According to Simon and Goes (2013), in scholarly studies, assumptions are beliefs that cannot be verified but are pivotal to the research. This study was conducted under several assumptions. First, the researcher assumed the variables in question were measurable and worth being investigated. The researcher also assumed the instruments in which she gathered the qualitative and quantitative data were valid and reliable. Lastly, this research believed the participants contributing to the quantitative and qualitative data collection did so truthfully and accurately. The quantitative survey was anonymous, and the quantitative and qualitative instruments did not involve any sensitive information. In addition, this researcher assumed the participants were knowledgeable on the subject and answered the questions with some level of expertise.

## **Summary**

This study aimed to determine whether the matching requirement of the federal education grant, GEAR UP, is an excessive administrative burden detracting from the grant's mission. This study expanded upon Hall's (2010) study, which found that a disproportionate burden exists for nonmetropolitan counties in three southern states administering federal economic development grants. This study used a mixed methods approach, specifically an explanatory sequential research design, which was the most appropriate because it built upon Hall's quantitative research. The researcher solicited quantitative and qualitative data from GEAR UP partnership grantees.

The researcher first used a survey to collect the quantitative data then interviewed participants based on the quantitative data. The researcher analyzed the data sets separately. Next, the researcher presented how the qualitative data clarify the quantitative results. A limitation of an explanatory sequential research design is that the researcher may pursue a particular finding, neglecting outcomes that need further exploration. Lastly, the researcher cautions readers of the generalizability of this study. The research reviewed only one federal education grant. Therefore, the results may not be valid for all federal grants with a cost-share requirement.

## CHAPTER 4: RESEARCH, DATA COLLECTION, AND FINDINGS

### **Overview**

This aim of this study was to determine whether the cost-share component of the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant adds value to the grant's mission or detracts from it. This study used an explanatory sequential research design to collect quantitative data and purposefully select the qualitative data participants. The qualitative interviews expounded upon results gathered during the quantitative data collection. Chapter 4 includes the presentation of the data and analysis and concludes with a brief summary of the findings.

### **Purpose Statement**

This study had two short-term goals. First, this study sought to determine whether the cost-share component of the GEAR UP grant is so burdensome it prevents educational organizations from applying for and successfully administering an award, and second, if the matching requirement of the grant was found to be detrimental to the grant's purpose, this study sought to determine to what extent.

### **Research Questions**

This study was guided by the following research questions:

1. To what extent does the cost-share requirement of the GEAR UP grant affect organization' desire to apply?
2. Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?
3. To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?

4. Is the cost-share component of the GEAR UP grant a programmatic benefit or programmatic limitation?

### **Research Methods and Data Collection Procedures**

The researcher used an explanatory sequential design to conduct this study. First, the researcher collected quantitative data using an electronic survey. The electronic survey allowed the researcher to divide participants into two groups based on their answers. The first group included those project directors who perceived the cost-share requirement of the GEAR UP grant to be a programmatic limitation, and the second group consisted of those project directors who perceived the cost-share requirement of the GEAR UP grant to be a programmatic benefit. Based on these groupings, the researcher solicited qualitative interviews from those GEAR UP project directors who perceived the cost-share requirements of the grant to be a programmatic limitation.

The researcher drafted the quantitative survey instrument in January 2022. On February 12, 2022, the researcher submitted her proposed study to California Baptist University's (CBU) Institutional Review Board (IRB). On February 25, 2022, IRB requested revisions to the researcher's application. The researcher submitted her revisions to IRB on March 10, 2022. On March 15, 2022, IRB accepted the research study. The researcher's IRB approval can be found in Appendix G. In late March 2022, the researcher pilot tested her quantitative instrument with six participants who had varying knowledge of the GEAR UP grant.

The pilot-test participants took the quantitative survey to advise the researcher on the instruments' validity, reliability, and usability. The participants took the questionnaire on both mobile phones and computers/laptops. The researcher made the suggested

revisions to her pilot test in late March 2022. On April 3, 2022, the researcher conducted a pilot study of her qualitative interview questions. The researcher interviewed two individuals with significant content knowledge of the GEAR UP grant. The researcher made revisions to the qualitative instrument in early April 2022.

The researcher shared her survey with GEAR UP project directors via NCCEP. NCCEP disseminated its survey link to project directors via the *GEAR UP Digest*, its national newsletter, and shared the survey link on its social media sites Facebook and Twitter. The first distribution of the survey was sent to 188 potential participants on May 10, 2022. The 188 recipients consisted of both state and partnership project grantees. A follow-up email was sent a week later on May 17, 2022. NCCEP sent a third and final email 3 days later on May 20, 2022.

In total, 55 participants clicked on the survey link. Six participants began the survey but were filtered out automatically because they were not a part of the intended survey sample. The researcher designed the electronic survey to discontinue the survey based on certain parameters. The researcher did not wish to solicit information from individuals with no involvement with the GEAR UP grant or from personnel working on a state grant. Three participants did not finish the survey. In total, 46 participants finished the survey in its entirety.

In June 2022, the researcher analyzed the data from her electronic surveys. Based on this data, she created two groups of project directors: those who believed the matching requirement of the grant is a programmatic limitation and those who believed the cost-share requirement of the grant is a programmatic benefit. In late June 2022, the researcher

conducted interviews with project directors who considered the matching requirement of the grant a programmatic limitation. The researcher conducted six interviews in total.

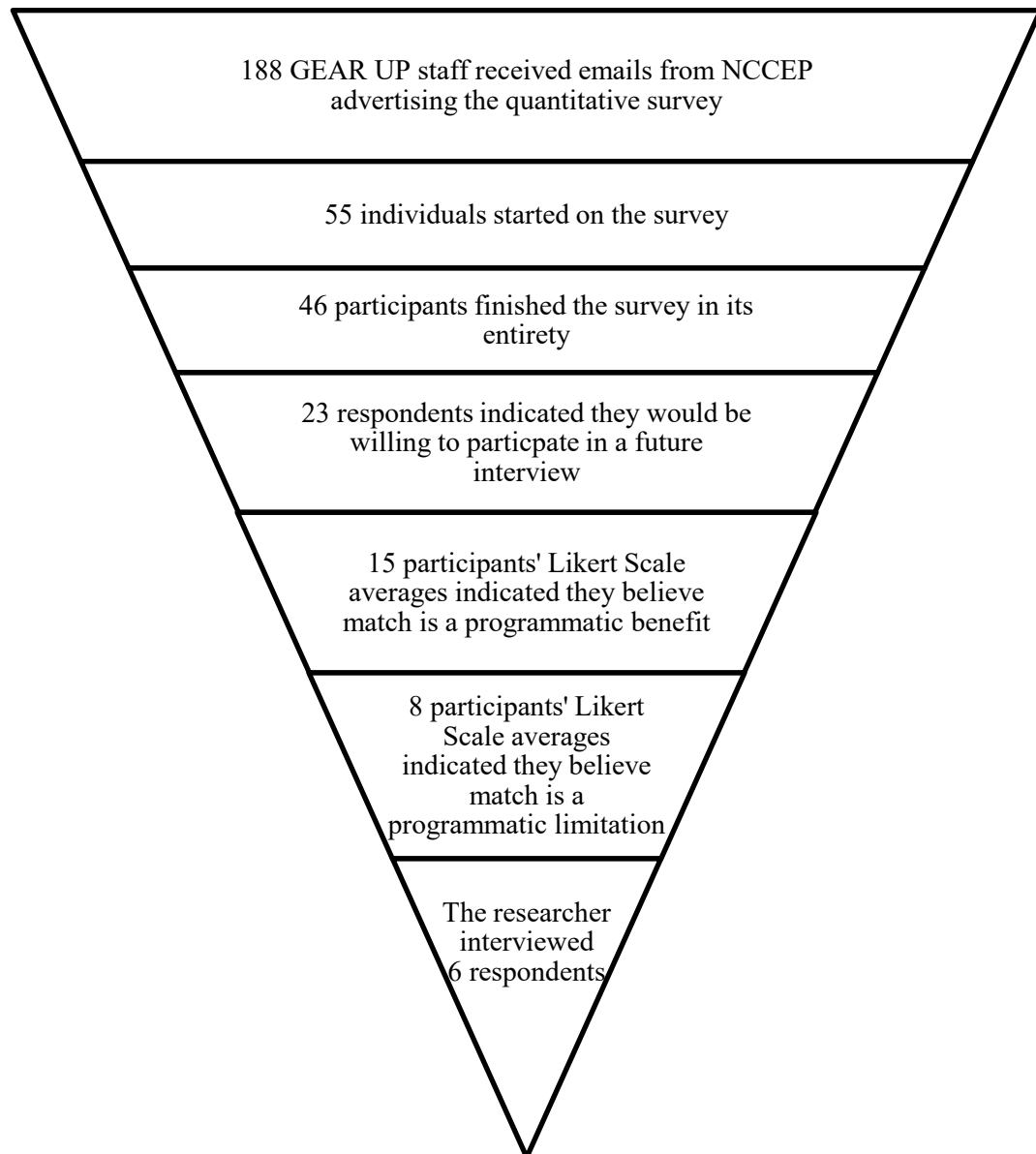
First, the researcher eliminated any participants who indicated they would not like to participate in a follow-up interview. This left 23 remaining participants of the original 55. Next, to create the two groups, the researcher assigned a numerical value to each of the Likert scale responses. A score of positive 2 was assigned to *strongly agree*, a score of positive 1 was assigned to *somewhat agree*, a score of negative 1 was assigned to *somewhat disagree*, and a score of negative 2 was assigned to *strongly disagree* except when the question required the inverse. The researcher then used a significant deviation of the average to form the two groups. An average of 0 indicated the respondent was neutral about the GEAR UP matching requirement. An average above 0 indicated the participant believed match to be a programmatic benefit. An average below 0 indicated the participant believed the cost-share requirement of the grant is a programmatic limitation.

Of the 23 participants willing to participate in a follow-up interview, 15 participants averaged a positive score indicating they believe match is a programmatic benefit. Eight participants averaged a negative or neutral score indicating they believe match is a programmatic limitation. Of the eight participants, the researcher interviewed six individuals. One participant's email address was obsolete, perhaps indicating the person had taken a different position outside of that educational institution, and the other participant did not schedule an interview. Figure 3 displays the process the researcher used to purposefully select her qualitative data sample.



**Figure 3**

*Selecting Qualitative Sample Size*



### **Presentation and Analysis of Data**

This section presents and analyzes the data of this study. The researcher applied an explanatory sequential research design first to the quantitative findings followed by the qualitative findings. Chapter 4 concludes with the researcher's analysis of the four research questions that guided this study.

## **Quantitative Data**

In the explanatory sequential research design, the researcher collects the quantitative and qualitative data and analyzes it consecutively (Creswell & Creswell, 2018). The researcher analyzed the quantitative survey data first. In total, 46 project directors completed the survey. On average, the survey took 3 min and 32 sec to complete. The first page of the survey included informed consent. Participants clicked on the next page to provide their consent to the researcher. The researcher included the survey in its entirety in Appendix H. The first question on the survey asked participants, “Do you currently work for a GEAR UP grant in some capacity?” If the participant answered “no,” they were not allowed to continue the survey. Two people who did not work for a GEAR UP grant in some capacity were removed from the survey.

## ***Demographic Data***

The next set of questions solicited demographic data. NCCEP sent the survey to a listserv of partnership grantees it maintains. Forty-two participants, or 95%, answered Question 2, “What is your position in relation to the GEAR UP grant?” as project director. Other options participants could select included principal investigator, coprincipal investigator, assistant director, business manager, data support specialist, program evaluator, or other. Two participants answered “principal investigator,” one participant answered “coprincipal investigator,” and two participants answered “assistant director.” The researcher included this question to ensure the knowledge base among participants was equal regarding understanding of the GEAR UP grant. Because all participants indicated they held a position of authority within their organization’s structure, it was reasonably assumed they had a sufficient knowledge base on the subject.

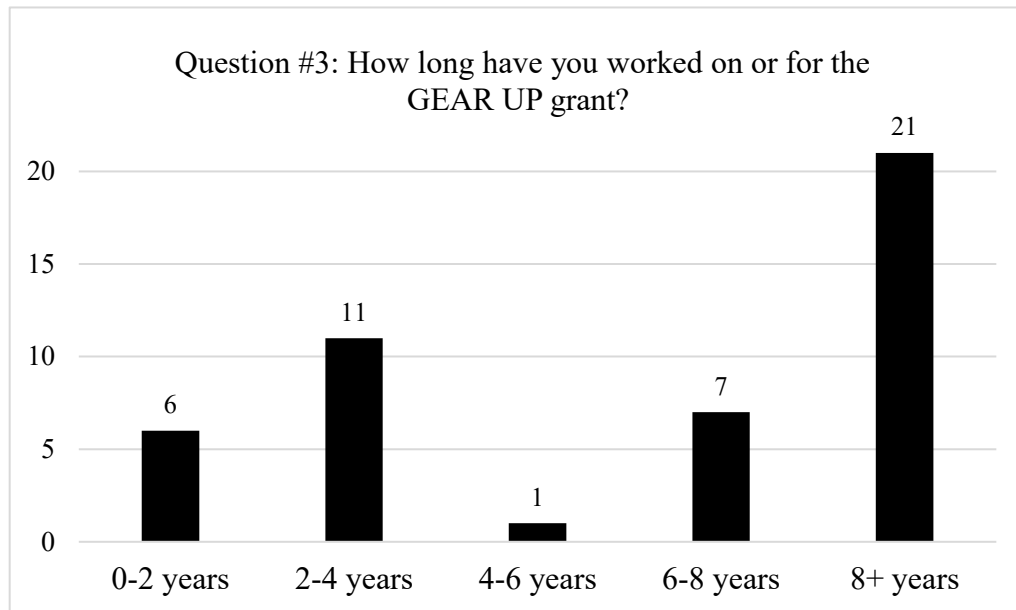
Question 3 on the quantitative survey asked participants to indicate how long they have worked on the GEAR UP grant. Participants could select 0–2 years, 2–4 years, 4–6 years, 6–8 years, or more than 8 years. The most common answer selected was more than 8 years. This indicated that most of the participants had historical knowledge of the GEAR UP grant. Figure 4 displays the number of participants in each group of employment duration.

Question 4 of the quantitative survey requested the title of the participants' GEAR UP grant. The question was used for the researcher's coding purposes only. Question 5 of the quantitative survey asked participants whether they worked on a state or partnership grant. If a participant selected state grant, the researcher instructed Qualtrics to remove them from the survey because state grants were not the researcher's intended sample. Only one participant was removed from the survey based on this criterion. Question 6 asked the participants to select the state in which their project operates. Of the 45 states participating in the GEAR UP grant with either a state or partnership program, 20 states were represented in this questionnaire. Texas was the most participating state with 10 responses.

Question 7 asked whether the participant's project serves students and families in primarily rural or urban locations. Thirty-one participants, or 67%, stated they served urban locations. Question 8 asked participants to provide the performance period their project was in as of the issuance of the survey. Performance periods are 6 or 7 years with the possibility of a 1-year, no-cost extension. Performance periods typically begin at the end of the federal FY, about October 1. Figure 5 illustrates how participants answered Survey Question 8.

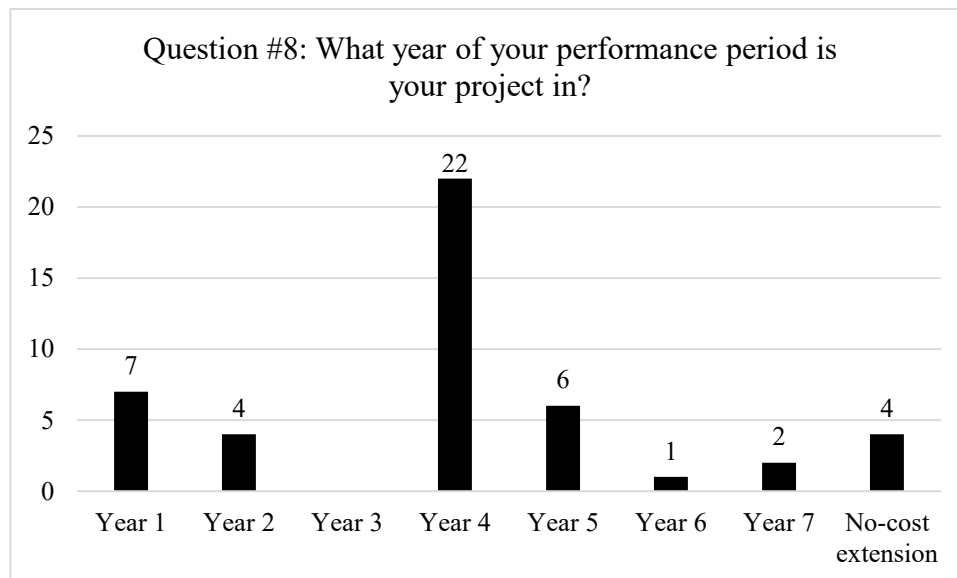
**Figure 4**

*Results of Quantitative Survey Question 3*



**Figure 5**

*Results of Quantitative Survey Question 8*



If participants indicated they were in year 6 or 7 of their performance period, the survey took them to an additional question. The additional question asked whether the

participants were in the final year of their project's performance period. This question was important to the researcher to ask because participants in programs in year 1 may have had less familiarity with GEAR UP and its matching requirement.

The last question on the demographic portion of the survey asked whether the participants' GEAR UP grant had ever received a match waiver. Of the 46 participants, only eight, or 17%, responded that their program had not received a match waiver. This was likely due to the waiver available to GEAR UP grants because of COVID-19.

### ***Likert Scale Questions***

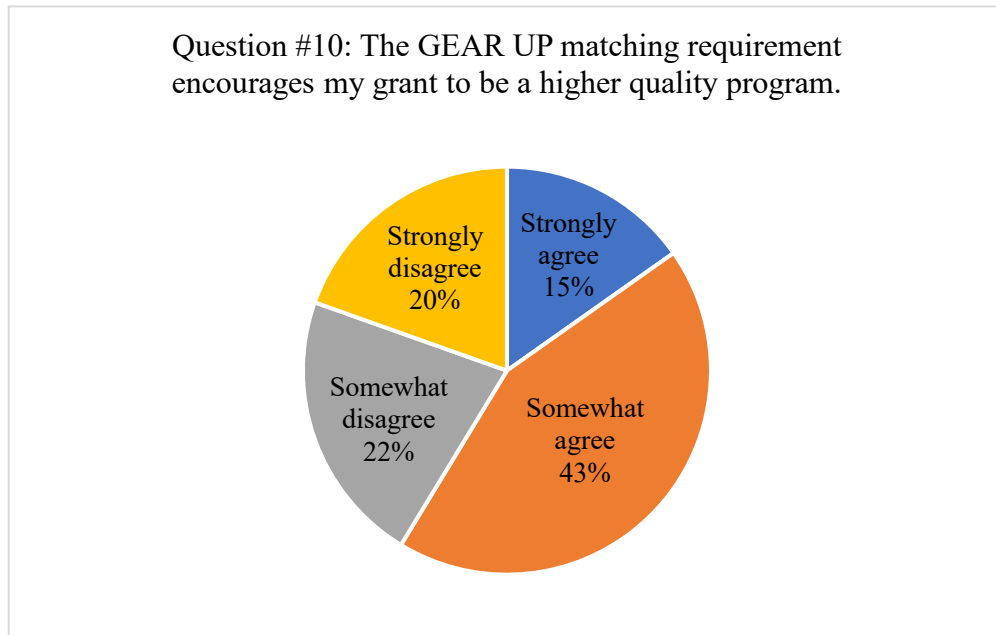
The next four questions on the quantitative survey were Likert scale-type questions concerning the participants' perception of match. A Likert scale is an attitudinal measurement developed by Rensis Likert in 1932 (Edmondson, 2005). Participants could select *strongly agree*, *somewhat agree*, *somewhat disagree*, or *strongly disagree* based on their opinion of the GEAR UP program. Survey Question 10 asked participants to respond with their agreement to the following statement: "The GEAR UP matching requirement encourages my grant to be a more quality program." The results of Survey Question 10 are shown in Figure 6.

Fifteen percent of participants *strongly agreed*, 43% of participants *somewhat agreed*, 22% of participants *somewhat disagreed*, and 20% of participants *strongly disagreed*. Over half of the participants, 58%, either *strongly agreed* or *somewhat agreed*.

Survey Question 11 asked participants to answer with their agreement to the following statement: "If there was no GEAR UP matching requirement, our project could serve students better." Figure 7 shows the results of Survey Question 11.

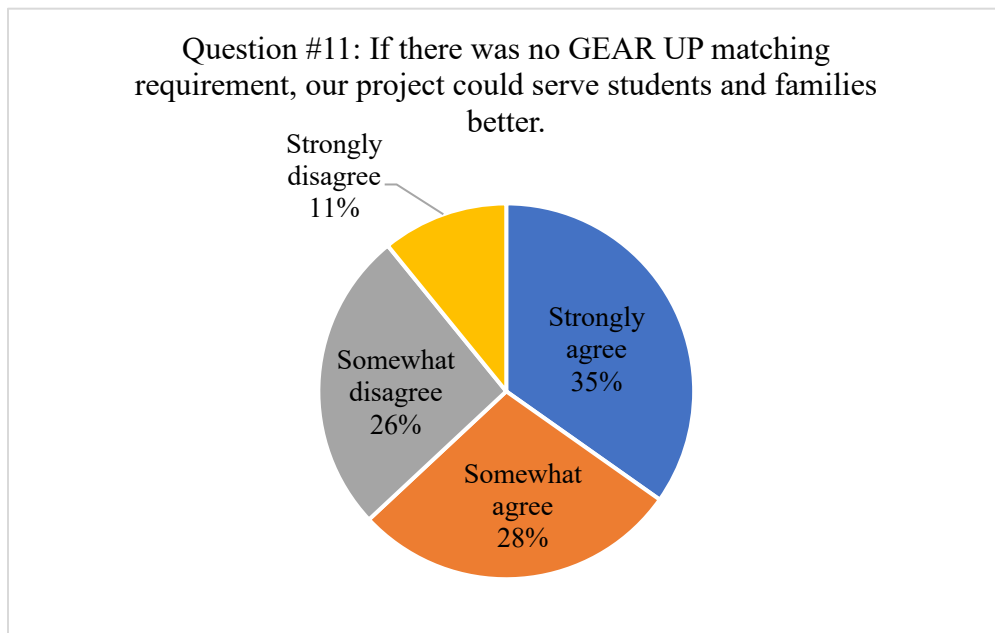
**Figure 6**

*Results of Quantitative Survey Question 10*



**Figure 7**

*Results of Quantitative Survey Question 11*



Thirty-five percent *strongly agreed*, 28% *somewhat agreed*, 26% *somewhat disagreed*, and 11% *strongly disagreed*. Sixty-three percent of participants either *strongly agreed* or *somewhat agreed* with this statement.

Survey Question 12 asked participants to answer with their agreement to the following statement: “The GEAR UP matching requirement made our organization hesitant to apply for the GEAR UP grant.” Figure 8 shows the results of this question.

Thirty-seven percent of participants *strongly disagreed*, 33% *somewhat disagreed*, 19% *somewhat agreed*, and 11% *strongly agreed*. Over two thirds of project directors answered the GEAR UP matching requirement was not a prohibitive factor in applying for the program.

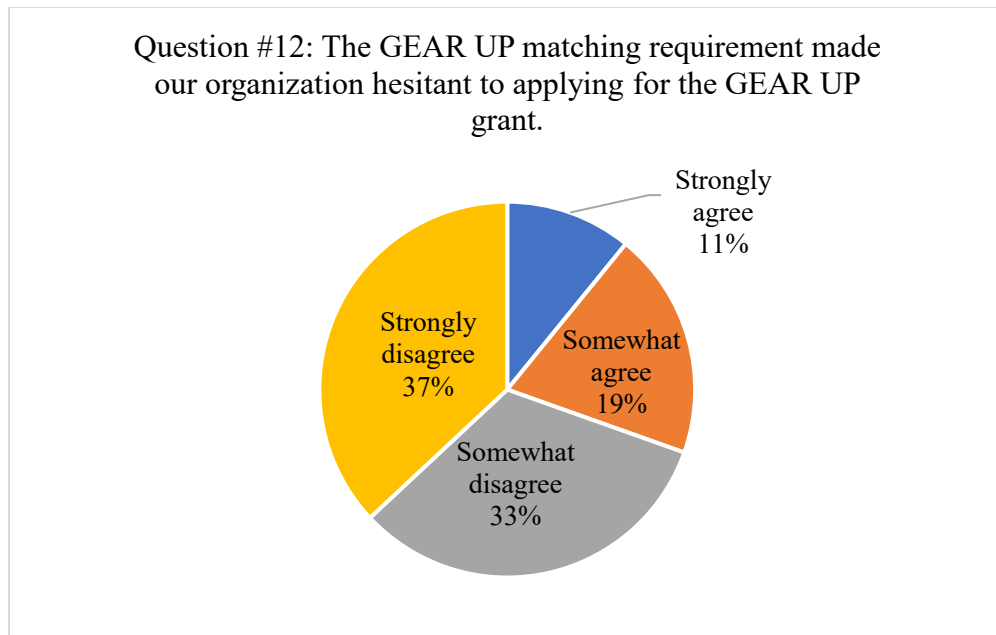
Survey Question 13 asked participants to indicate their project’s time spent tracking and obtaining match as a percentage of total time spent on the grant. Participants could select from 0%–20%, 20%–40%, 40%–60% or 60% or more of their time. The results of Question 13 are included in Figure 9.

Twenty participants stated they spent 0%–20% of their time tracking and obtaining match, 23 participants answered 20%–40%, two participants answered 40%–60%, and one participant answered 60% or more.

The results of the Likert scale questions provided the following general insights. Participants believed the matching requirement of the grant encourages their program to be of higher quality; however, if the participants did not have to spend 20%–40% of their time obtaining and tracking the match, they could provide an overall higher quality experience for students and families. In addition, the cost-share requirement of the grant did not give organizations pause in applying for the program.

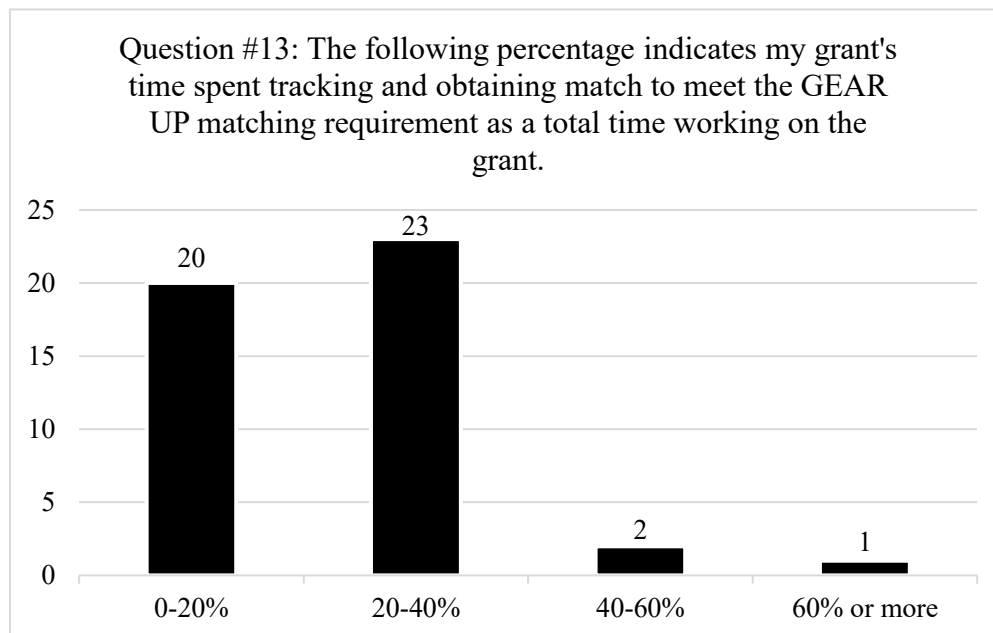
**Figure 8**

*Results of Quantitative Survey Question 12*



**Figure 9**

*Results of Quantitative Survey Question 13*





## **Qualitative Data**

Beginning June 21, 2022, the researcher began conducting qualitative interviews. Qualitative interviews were conducted with those participants whose quantitative survey response resulted in an unfavorable view of the GEAR UP matching requirement. Of the 46 survey participants, 23 stated they would be willing to participate in a follow-up interview. Of the 23 willing participants, eight had an unfavorable view of the GEAR UP matching requirement. The researcher sent an initial email June 20, 2022, requesting interview participation. A subsequent email was sent the following week on June 28, 2022. A third and final email was sent July 1, 2022. In total six individuals participated. One individual did not respond, and it appeared one individual was no longer employed at the educational organization linked to the individual's email address.

The interview consisted of 10 questions and took, on average, 22 min to complete. Interviews were conducted with six administrators of GEAR UP partnership grants. Four of the participants managed projects in entirely urban locations, and two participants served a mixture of urban and more rural, or suburban, locations. There were three female participants and three male participants. Interviews were scheduled using the scheduling software Calendly, and interviews were conducted via Microsoft Teams and recorded. The qualitative interview questions are included in Appendix I.

During the interview, the researcher first introduced herself, reminded the participants of the purpose of the study, and confirmed the participants had a baseline understanding of the terms match and cost-share. All participants confirmed comprehension of these terms. The first interview question asked them to briefly describe their roles and responsibilities as they pertain to the GEAR UP grant. All participants

stated they were the project director for their program, which was triangulated with the quantitative data. The project directors stated their roles chiefly involved management of staff, overseeing the budget and match, ensuring compliance with rules and regulations, and data management.

The second question of the interview asked, “In your opinion, have students and families in your area benefitted from your organization’s GEAR UP grant award? Please provide an example.” All participants responded that they believed students and families in their area had benefitted from the awards. The purpose of this question was to make the participants feel comfortable and to share successes of their grant award. A few participants mentioned they were currently conducting their summer programming and providing college campus tours. Other participants discussed parent consortiums, relationship building with school staff and students, and postsecondary completion.

The third question of the qualitative survey asked, “What involvement do you have, if any, in gathering and tracking match for your organization?” Four of the six participants stated they were either the sole or the main individual employed by the grant responsible for gathering and tracking match. One project director said it succinctly: “The buck stops with me.” The remaining participants had an individual on staff dedicated to gathering and tracking match, but there seemed to be mixed reviews on this role. One participant stated it took a while to get the system to run smoothly, but once it did, the position worked well. Another participant had previously had an individual dedicated to gathering and tracking match, but this did not work out, and the position returned to being the director’s responsibility. This question enabled the researcher to determine

what familiarity project directors had with match. The answer was overwhelmingly an intimate familiarity.

The fourth question of the interview asked, “On the quantitative survey, you answered that the matching requirement of the grant does not make your program a more quality program. Can you please explain your answer?” All participants interviewed had either a neutral or a negative perception of GEAR UP match based on the average Likert scale questions of the quantitative survey. Responses centered on one of four themes. The first theme regarded the issue that project directors felt the match component of the GEAR UP grant distracted their most important asset, the people employed by the grant, from doing meaningful work. Several project directors stated they believe the most valuable resource the GEAR UP grant provides to students, family, and school staff are the GEAR UP employees. GEAR UP employees provide additional support to school staff, who are frequently stretched thin, and provide extra social and emotional support to students. To summarize the participants’ answers, having GEAR UP staff and school staff spend time filling out trivial paperwork is not the best use of their time.

The second theme that emerged from Interview Question 4 was that generally, the school district or college/university was already leveraging educational partnerships. A couple of participants referred to the “spirit” of the GEAR UP match. One project director intimated that the spirit, or intention, of the cost-share component of the grant was to encourage partnerships between the educational system and the community in the hope that many of the activities that take place as a result of the grant continue even after the grant has ended. Although the project directors acknowledged the grant’s good intentions of encouraging these partnerships, they argued their organizations were already

engaging in these relationships, and the documentation of such partnerships is unnecessary.

A third reason as to why project directors' survey responses indicated they were neutral or even displeased with the GEAR UP matching requirement is the effect on partnerships. Project directors stated that partners seemed eager to participate with the GEAR UP program until it was time to fill out the paperwork and commit to a dollar amount of in-kind match.

Despite being in-kind, or a soft match, partners are hesitant or even refuse to provide the commitment on paper. The form that a few of the project directors specifically referred to is called the Partner Identification Form (PIF) and Cost-Share Worksheet. The PIF requires partners to commit a specific dollar amount of match per various line items including salaries and wages, employee benefits, materials and supplies, consultants and contacts, other, equipment, and scholarship or tuition assistance. In addition, partners filling out the form must commit to match for each year of the grant, which is 6 or 7 years. One project director stated that after seeing the PIF, some partners refuse to fill out the form or disengage from participating in the grant altogether:

The partnership form is also problematic. A lot of times you have an organization that you would think, "Wow. This is really a great fit for us." And then that partnership form scares them. They don't want to sign off. They said, "Well, wait a minute. If I don't pony up to everything I'm saying here, is something going to happen to us from the federal government?" And I say no, but it's an intimidating form.

Participants stated that they felt in-kind match is a challenging concept for partners to grasp; it is difficult to estimate a dollar value of in-kind services and on top of that have partners agree to a value in writing over 6 or 7 years.

Lastly, some project directors explained their disapproval for match on the quantitative survey was due to the fact that cash match, or hard match, was not being collected. A few of the participants stated they understood the need for documentation if a cash match was being collected. Partnership grantees awarded in 2021 received a year 1 budget that ranged from \$200,000 to more than \$7.5 million. Grantees understood the need for documentation if a cash match was being leveraged; however, because it was not, the project directors felt the paperwork was, in a word, “pointless,” “bullshit,” “banal,” and otherwise “burdensome.”

The first participant’s answer to Interview Question 4 resulted in an additional interview question that the researcher asked all other participants. Interview Subquestion 4 asked, “Do you feel partners would provide support or incentives for your GEAR UP grant regardless of the matching requirement?” Four of the six participants agreed that they thought their partners would provide support or incentives regardless of the matching component. One participant stated,

I think that the folks that are going to give you stuff for free or at a discount would do it anyway, like more nonprofit or an educational program. So, all of the things that we receive and match, if I ask them to do it, they would do it. And so, I feel like I said before is like, match is really just administrative, like getting the signatures, reconciling, uploading the requirement. It’s really just like on paper,

kind of like, you know what I mean? They would do it anyway. So, it's not like the match is an incentive for the partner at all. Like what do they care?

One GEAR UP project director stated their program already used some partners who were not willing to document their services because of their uneasiness with the match forms. Of those who did not believe their partners would provide incentives or discounts if the matching requirement was no object stated it was because the GEAR UP funds purchased their partners' services. The partners relied upon the GEAR UP dollars for funding, and if there were no GEAR UP dollars, they would not be willing or able to provide incentives or discounted services.

Question 5 of the qualitative interview asked project directors, "As an administrator do you think the effort involved in gathering match is proportional to the benefit to students and families?" All participants answered with a resounding "no." Again, project directors mentioned they were already leveraging these partnerships. One project director pointed out that another federal higher education grant, Upward Bound (UB), did not require cost-share while still encouraging community partnerships. The project director stated that although a match commitment was not required from participating organizations, if an educational organization submitted an UB grant application without partnerships, it would not be funded because it would not be a competitive grant. The application process itself encourages educational organizations to seek out these partnerships organically to create a quality program.

One project director equated match to health insurance. The only time students and families may need to get involved with or understand match is if it is not working or

if the educational organization is not generating enough match, which could lead to fewer or poorer deliverables. The project director stated,

If I'm receiving healthcare, I don't need to know the ins and outs of what's taking place. I just literally need for you to heal my wound. They may say like, oh, well, this is not covered by your insurance. Now, I might have to look at the detail in the policy. The community that we work with, they don't need to know.

Similar to health insurance, GEAR UP cost-share encourages the commodification of services that are not easily commodified. Especially considering the COVID-19 pandemic that has created reverberating effects on school systems, staff, and students, according to one project director, assigning a value to the social and emotional support provided by GEAR UP employees and partners reduces the relationship to that of a transaction.

The sixth interview question asked whether project directors applied for the COVID-19 match waiver. All but one grantee applied for the GEAR UP COVID-19 match waiver. The project directors who chose not to apply for the waiver did so because they were in the 1st year of their project. All other project directors said they were continuing to collect and track match as usual. There were mixed reviews on whether match was easier to collect during the pandemic or before the pandemic. Projects that relied heavily on space or room rent as a matching source had difficulty during the pandemic because many people switched to working from home. However, one project director was able to use new technology sources as a result of the pandemic as match. Lastly, project directors hoped by gathering and tracking match as usual, they would have less to worry about in regard to cost-share in subsequent years of their projects. One

project director in the final year of the project stated that the match waiver allowed her project to be more innovative and spend more time with staff:

Your mind is a little bit free, and you're able to, I guess, explore, dream, and I don't know, the other things that you can do. And one of the things is that I'm able to also be more around with staff. So instead of having to just trying to collect and connecting with partners, I'm also connecting with my staff a little bit more because again, I don't have that piece and then I'm not stressing them like, "Hey, make sure you don't forget to get a signature because you're going to go to [X, Y, and Z] meeting or event.

Question 7 of the qualitative interview asked project directors whether their organization was apprehensive in applying for the GEAR UP grant as a result of the cost-share component. Project directors' answers varied. Grantees who had previous familiarity with the GEAR UP grant had little to no hesitation. Organizations' familiarity came from a previous award or involvement in a previous award in which they were a subrecipient but not the primary awardee. One project director stated that even if the organization applying for the grant, such as a college or university, had no previous experience with a GEAR UP grant, its motivation in applying for the grant outweighed any hesitation regarding the matching component:

I think that the motivation for institutions is different. I think universities apply to GEAR UP programs because they're multimillion dollar grants and say, I don't know which departments apply to it. In our case, it's the school of education. The school of education, universities put out how each department or school is doing based on how much funding dollars they bring, right? As a university, it behooves



me to bring in research dollars, or any kind of grant dollars because now I am showing the university my capitalist nature, look, we're bringing in money. But do we honestly care about changing the infrastructure of [X school district]? No. However, another project director stated that although her current employer applied for the GEAR UP grant, a previous employer ultimately decided not to apply for the grant because of the cost-share requirement.

Interview Question 8 asked, "Do you feel the matching requirement of the grant impacts metropolitan and nonmetropolitan projects equally?" This question was difficult for some project directors to answer because all but two project directors served entirely urban populations. Participants noted obvious challenges of rural areas, such as travel, fewer community partners, smaller organizations with less staff capacity, smaller salaries, and fewer facilities. However, some of the challenges noted by project directors did not discriminate between metropolitan and nonmetropolitan projects. Despite working in an urban setting, one project director described the challenge of all the educational organizations attempting to leverage the same partnerships:

I can only speak to urban. I think, and this may apply to rural. I've just never been in that world, but I think one thing that educational entities do is tap into the same organizations over and over and over and over again, no matter what your project is. So we all go to the same entities and we're asking for maybe different services or very similar services, and so I think we spread those organizations too thin and so that can hurt match as well. You try to be creative. You try to see how they fit, but oftentimes, they don't see how they fit, or they said, I've already just made a

commitment to somebody else and I can't do this, and I'm sure in rural areas, they have a very small group of organizations and/or companies that they can tap into. The researcher concluded the interviews by asking participants whether they had anything in particular they wanted to share concerning the GEAR UP grant.

### **Research Questions**

The researcher developed the following four research questions to guide her study:

1. To what extent does the cost-share requirement of the GEAR UP grant affect organizations' desire to apply?
2. Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?
3. To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?
4. Is the cost-share component of the GEAR UP grant a programmatic benefit or programmatic limitation?

The results of each research question are discussed in the next sections.

#### **Research Question 1**

The first research question asked, "To what extent does the cost-share requirement of the GEAR UP grant affect organizations' desire to apply?" The researcher used the results of her quantitative and qualitative data collection to answer this question.

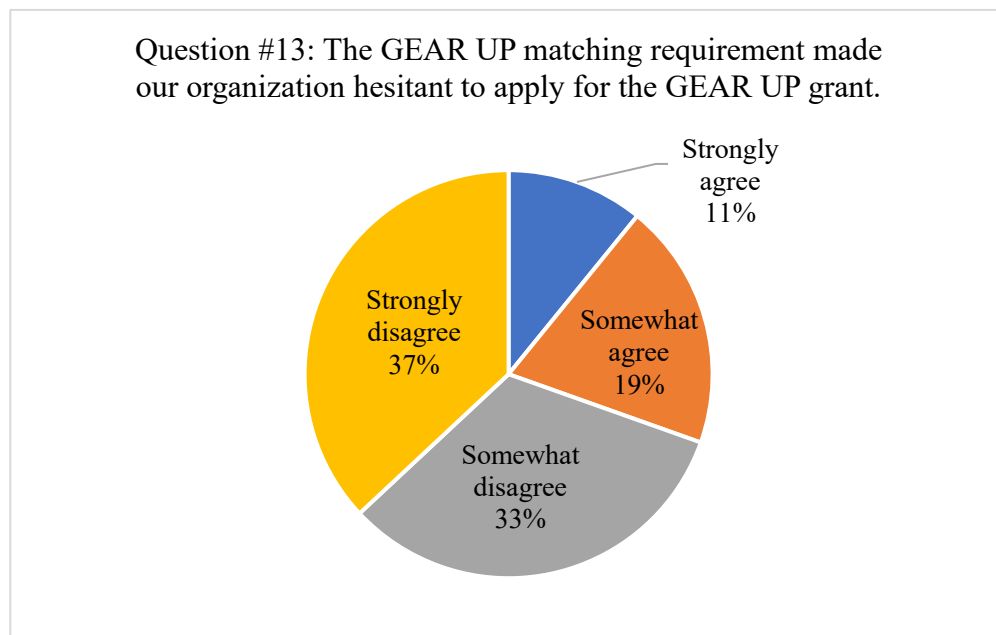
#### ***Quantitative Findings***

Question 13 of the quantitative survey asked participants to respond with their agreement to the following question: "The GEAR UP matching requirement made our

organization hesitant to apply for the GEAR UP grant.” Figure 8 shows the results of this question (repeated for ease of reference).

**Figure 8**

*Results of Quantitative Survey Question 12*



Thirty-seven percent of participants *strongly disagreed*, 33% *somewhat disagreed*, 19% *somewhat agreed*, and 11% *strongly agreed* that the GEAR UP matching requirement made their organization hesitant to apply for the GEAR UP grant. Sixty-eight percent of survey respondents either *strongly disagreed* or *somewhat disagreed* that the GEAR UP matching requirement made their organization hesitant to apply for the GEAR UP grant. For this reason, the quantitative data provided showed that the cost-share requirement of the GEAR UP grant does not adversely affect organizations’ desire to apply.

### ***Qualitative Findings***

The qualitative data provided mixed responses. One project director stated that at the previous university they worked at, the GEAR UP matching requirement was so

prohibitive that the university chose not to apply and looked for other federal education grants in which to apply. Other project directors stated that their school district, college, or university had previous familiarity with the GEAR UP grant, which allowed them to feel comfortable with the cost-share component. Previous familiarity stemmed from a previous award or involvement in a previous award. One project director in particular stated they were previously involved with a state grant and decided to apply for a partnership grant.

Another project director stated that even if the organization applying for the grant, such as a college or university, had no previous experience with GEAR UP, its reason for applying for the grant outweighed any hesitation regarding the matching component. The project director believed the reasons for a college or university were to garner grant dollars rather than the more altruistic reason of creating a college-going culture. However, the researcher acknowledged there may be some inherit bias involved with this research question. Clearly, all of the educational institutions employing the project directors with whom the researcher spoke did not find the cost-share component was excessive enough not to apply.

Research Question 1 asked, “To what extent does the cost-share requirement of the GEAR UP grant affect organizations’ desire to apply?” Based on the results of both the quantitative and qualitative data, the cost-share requirement has an insignificant impact on organizations’ desire to apply.

## **Research Question 2**

The second research question asked, “Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?” The

researcher answered Research Question 2 through her quantitative and qualitative data collection. However, because the researcher did not speak with any project directors from nonmetropolitan locales, she could not draw conclusions from the qualitative data alone.

### ***Quantitative Findings***

Question 7 on the quantitative survey asked participants, “Does your GEAR UP project serve students and families in primarily rural or urban locations?” Fifteen participants stated they served rural locations. Of the 15 participants, the researcher assigned a value to their Likert scale survey responses. A score of positive 2 was assigned to *strongly agree*, a score of positive 1 was assigned to *somewhat agree*, a score of negative 1 was assigned to *somewhat disagree*, and a score of negative 2 was assigned to *strongly disagree* except for when the question required the inverse. The researcher then used a significant deviation of the average to group rural project directors’ based on their approval or disapproval of cost-share. An average of 0 indicated the participant was neutral about the GEAR UP matching requirement. An average above 0 indicated the participant believed match to be a programmatic benefit. An average below 0 indicated the participant believed the cost-share requirement of the grant was a programmatic limitation.

Six survey participants from nonmetropolitan GEAR UP projects believed match to be a programmatic limitation. Seven survey participants from rural GEAR UP projects believed match to be a programmatic benefit. Two survey participants were neutral on the subject. Eight survey participants had negative or neutral feelings on the cost-share requirement of the GEAR UP grant. Because there was nearly the same number of survey participants from rural locales who believed match to be a programmatic benefit as there

were those who believed match to be a programmatic limitation, there was not a significant difference in the cost-share burden between metropolitan and nonmetropolitan projects.

### ***Qualitative Findings***

The researcher used NCCEP's mailing list to send her quantitative survey via email to 188 individuals. Fifty-five people took the survey. Forty-seven people finished the survey in its entirety. The researcher designed the survey to eliminate those individuals who were not involved with the GEAR UP grant or who did not work on a partnership grant. Twenty-three individuals indicated they would be willing to participate in a follow-up interview. Of these 23 individuals, eight indicated via an average of their Likert scale responses that they were neutral or had negative feelings toward the matching requirement of the GEAR UP grant. The researcher scheduled interviews with six project directors, none of whom were from nonmetropolitan locations. Because the researcher did not speak with any project directors from nonmetropolitan locales, the qualitative data could not be used to answer Research Question 2.

Nevertheless, the quantitative data showed there were nearly the same number of GEAR UP personnel who had negative or neutral feelings about the GEAR UP matching requirement as there were GEAR UP personnel who had positive feelings toward the matching requirement. Based on the quantitative data alone, the response to Research Question 2, "Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?" was "no, there is not a significant difference."

### Research Question 3

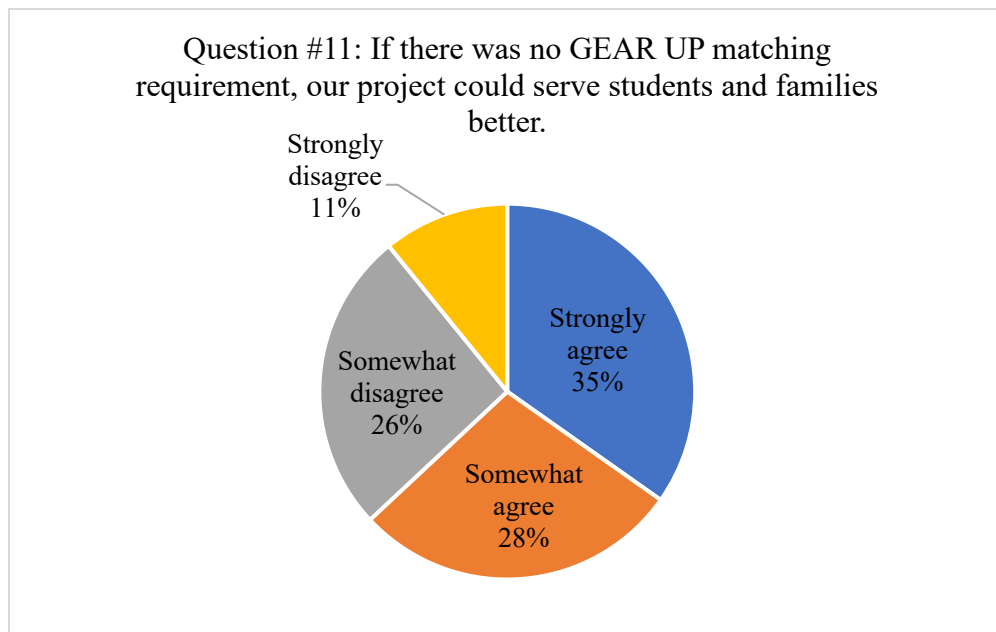
The third research question asked, “To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?” The researcher used the results of her quantitative and qualitative data collection to answer Research Question 3.

#### *Quantitative Findings*

Question 11 on the quantitative survey asked participants their opinion on the following statement: “If there was no GEAR UP matching requirement, our project could serve students and families better.” The results of Question 11 are shown in Figure 7 (repeated for ease of reference).

**Figure 7**

*Results of Quantitative Survey Question 11*



Thirty-five percent of participants *strongly agreed*, 28% *somewhat agreed*, 26% *somewhat disagreed*, and 11% *strongly disagreed*. Sixty-three percent of participants

either *strongly agreed* or *somewhat agreed* with this statement. Based on the results of the quantitative data, GEAR UP personnel believed if there were no GEAR UP matching requirement, GEAR UP staff could serve students and families better.

### ***Qualitative Findings***

The researcher intended to answer Research Question 3, “To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?” by using project directors’ experiences with the COVID-19 match waiver. However, all but two of the six project directors, despite receiving the match waiver, were collecting match as usual in hopes of alleviating the need for cost-share later in their programs. Yet, one project director who was in the final year of the grant’s performance period and received a match waiver stated not having the constant stressor of match allowed their program to “dream” and reconnect with staff.

In addition, during the qualitative interviews, the project directors were asked Question 5: “As an administrator do you think the effort involved in gathering match is proportional to the benefit to students and families? Why or why not?” All six project directors answered “no.” One project director stated a similar federal education grant, the UB grant, does not require cost-share as a condition of the grant and successfully provides postsecondary attainment support to students and families. Another project director equated match to health insurance. Students and families are typically only made aware of the cost-share condition of the grant if it leads to fewer or poorer deliverables. Lastly, several project directors stated they believed their programs’ greatest assets are the people the grant employs. Without the GEAR UP matching requirement, they



believed their greatest assets could be spending more substantive time serving students and families.

In response to Research Question 3, based on the results of the quantitative and qualitative data, the elimination of the cost-share requirement of the GEAR UP grant would result in a meaningful impact on the quality of services.

#### **Research Question 4**

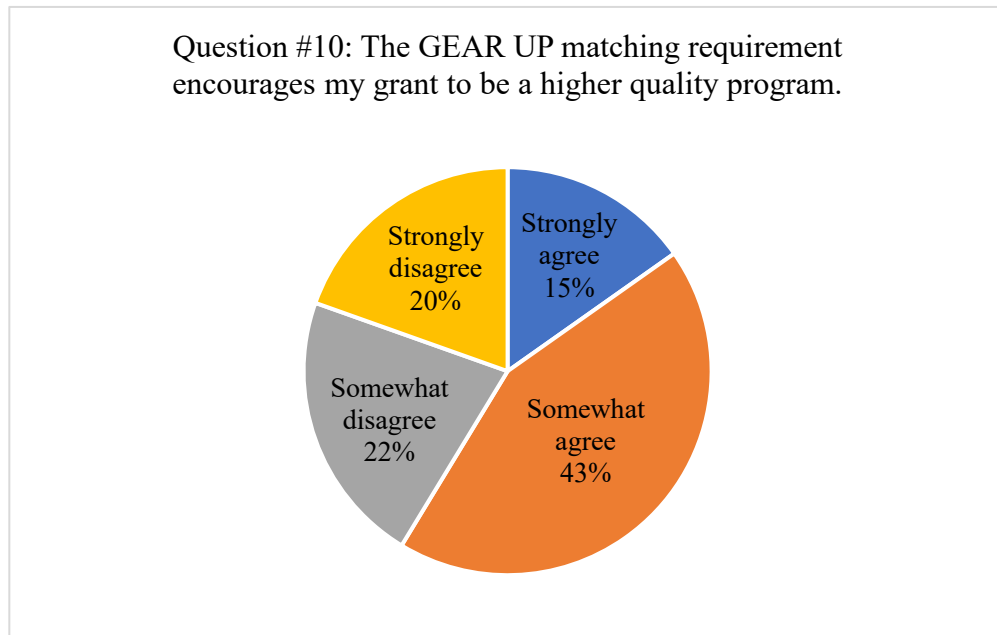
The fourth research question asked, “Is the cost-share component of the GEAR UP grant a programmatic benefit or programmatic limitation?” The researcher used the results of her quantitative and qualitative data collection to answer Research Question 4.

#### ***Quantitative Findings***

Question 10 on the quantitative survey asked participants to respond with their agreement to the following statement: “The GEAR UP matching requirement encourages my grant to be a more quality program.” The results of Question 10 are shown in Figure 6 (repeated for ease of reference). Fifteen percent of participants *strongly agreed*, 43% of participants *somewhat agreed*, 22% of participants *somewhat disagreed*, and 20% of participants *strongly disagreed* the GEAR UP matching requirement encourages a higher quality program. Over half of the participants, 58%, either *strongly agreed* or *somewhat agreed*. Based on the quantitative survey results of Question 10, a majority of GEAR UP personnel believed the matching requirement encourages their grant to be a higher quality program.

**Figure 6**

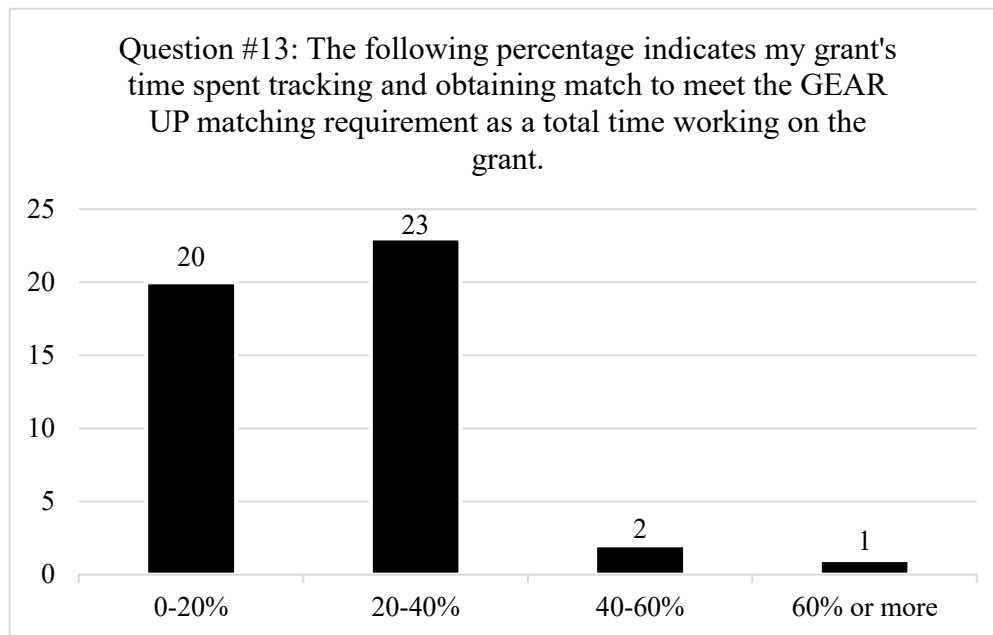
*Results of Quantitative Survey Question 10*



The results of Questions 10 and 11 from the quantitative survey provided conflicting answers. Although a majority of GEAR UP staff believed the matching requirement encourages their project to be a higher quality program, a greater majority believed without the matching requirement they could better serve students and families. The results of Question 13 of the quantitative survey helped to reconcile these conflicting answers. Question 13 asked participants to indicate their project's time spent tracking and obtaining match as a percentage of total time spent on the grant. Participants could select 0%–20%, 20%–40%, 40%–60%, or 60% or more of their time. The result of Question 13 is included in Figure 9 (repeated for ease of reference).

**Figure 9**

*Results of Quantitative Survey Question 13*



Twenty participants stated they spent 0%–20% of their time tracking and obtaining match, 23 participants answered 20%–40%, two answered 40%–60%, and one answered 60% or more of their time. Therefore, although GEAR UP staff feel the matching requirement encourages their grants to be a more quality program, the administration of match is a significant time commitment. It is plausible staff believe if there was no GEAR UP matching requirement, 20%–40% more time could be spent serving students and families.

### ***Qualitative Findings***

The qualitative data were evident. GEAR UP project directors found the administrative responsibilities of the grant burdensome. By design, all project directors interviewed indicated they were neutral or had negative feelings toward the matching requirement of the grant. The interviews revealed obtaining and tracking cost-share was

largely the project directors' responsibility and they were held accountable if the match was insufficient. However, the qualitative data also revealed that match was one aspect of project directors' responsibilities. In addition to match, a critical administrative piece of the grant, project directors were also responsible for overseeing staff, managing the budget, ensuring compliance with rules and regulations, and overseeing data management and required reporting. Considering project directors have a wide range of administrative responsibilities without match, it is understandable that they classify the additional administrative task of cost-share as burdensome.

### **Summary**

The researcher used the following four research questions to guide the study:

1. To what extent does the cost-share requirement of the GEAR UP grant affect organizations' desire to apply?
2. Is there a significant difference in the cost-share burden between metropolitan and nonmetropolitan GEAR UP projects?
3. To what degree would the elimination of the cost-share requirement of the GEAR UP grant result in a meaningful impact on the quality of services?
4. Is the cost-share component of the GEAR UP grant a programmatic benefit or programmatic limitation?

The researcher used both quantitative and qualitative data to answer the research questions. Based on the data, the cost-share requirement was not a prohibitive factor to educational organizations in applying for the GEAR UP grant. This may be due to the varying motivations educational organizations have in applying for federal education grants. In addition, the researcher found that there was no significant difference in the

cost-share burden between metropolitan and nonmetropolitan GEAR UP partnership grantees. However, this conclusion could not be corroborated by the qualitative data because the researcher was unable to interview any GEAR UP partnership project directors from rural locations.

Although project directors felt the cost-share requirement of the GEAR UP grant incentivizes their projects to be of higher quality, they believed eliminating this condition would result in a meaningful impact on the services the program can provide. Several project directors felt the most valuable asset of their project was the people whom the grant employs. Without the cost-share requirement, 20%–40% more time could be spent providing services to students and families instead of on administrative tasks. Project directors are the people primarily responsible for match, and it is just one of their many responsibilities. Overall, project directors felt the cost-share requirement was a programmatic limitation because the work involved with match was not proportional to the benefit to students and families.

## CHAPTER 5: FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

This study sought to determine whether the cost-share component of the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant is a meaningful asset to the program or whether it is an arbitrary administrative task. If it was determined the matching requirement is an arbitrary administrative requirement, this study sought to determine to what extent it may be prohibiting educational organizations in applying for and successfully administering the grant. This study used an explanatory sequential research design to purposefully select a sample from a population of 121 GEAR UP partnership project directors. After soliciting quantitative survey data from 46 GEAR UP partnership grant personnel, the researcher interviewed six GEAR UP project directors to elaborate on the quantitative research.

### **Major Findings**

#### **Quantitative Findings**

The quantitative data were collected from 46 participants who consisted primarily of GEAR UP partnership grantee project directors. The project directors were from 20 of the 45 states that were currently managing a GEAR UP grant. Many of the project directors had worked with the GEAR UP grant for more than 8 years. Most participants stated their project was in its 4th year of its performance period, and approximately two thirds of GEAR UP partnership grant awardees served a predominantly urban population.

The Likert scale questions on the quantitative survey did not result in a stark contrast between metropolitan partnership grantees and nonmetropolitan partnership grantees' attitudes toward the matching requirement of the grant. In fact, of the 23 individuals who stated they would be willing to participate in a follow-up interview, the

majority, 15 individuals, had an overall positive outlook on match based on the average of their Likert scale responses. Based on previous experience, the researcher predicted most project directors would have an overall disapproval of GEAR UP match. The researcher also predicted project directors serving rural populations would have an even greater disdain for cost-share, but this was not the case.

The quantitative data allowed the researcher to purposefully select her sample for the qualitative interviews. Of the 23 quantitative survey participants who indicated they would be willing to participate in the qualitative interviews, eight GEAR UP personnel had a negative or neutral perception of the GEAR UP matching requirement based on the average of the participants' Likert scale responses. The researcher then conducted interviews with six of these partnership grantees. The researcher was unable to schedule interviews with two of the partnership project directors.

### **Qualitative Findings**

The interviews conducted with six GEAR UP project directors expounded on the quantitative data with rich qualitative text included in this study. Despite the researcher not asking overtly, a few of the project directors stated the purpose of the GEAR UP grant, and their purpose as a GEAR UP project, is to create a college-going culture within the community they serve. In addition, similar to Jeremy Hall's 2010 research on economic development matching grants in three southern states, the researcher found that the issues with match were not exclusive to a geographic area. Although the researcher could not make conclusive statements on the effects of match on nonmetropolitan areas, because her qualitative sample did not include any exclusively rural partnership grants, the issues facing nonmetropolitan GEAR UP projects also plague metropolitan GEAR

UP grants. Even the most obvious or superficial difficulties assumed to be experienced by nonmetropolitan projects such as travel constraints may also burden metropolitan projects. For example, one project director in an urban locale stated despite being in a metropolitan area and 5 min away from a partner college campus, travel could take as long as 1 hr because of traffic.

Although difficultly gathering match appeared to be a significant problem troubling grantees, the true issue seemed to stem from the relationship of the GEAR UP staff with the awarded institution, such as the college, university, or school district. Those grantees with a poor relationship with the awarded institution felt that the cost-share requirement of the grant was a large hurdle. Project directors felt the school district, college, or university had a steep learning curve regarding the cost-share component. In addition, some GEAR UP staff felt that they not only had to address the administrative rules and regulations of the federal grant but also had to tackle the administrative rules and regulations of the awarded institution.

Although match was still burdensome for GEAR UP project directors with a positive relationship with the awarded institution, the match process felt less transactional in nature. Project directors whose relationship with the awarded institution was weak, were skeptical of the organization's intentions in applying for and instituting the GEAR UP grant as told by one project director:

I asked my supervisor, are we truly interested in transformation and reimagining? Or are we just having marginalized people understand how they can live comfortably within the margins? So for me, to go back to your original question, I don't think, for me, it's an issue of match per se, more so than their intentions are



different. What they're going to say is it's my responsibility as a director to take care of the match. It behooves them that I take care of the match, because then they can get more GEAR UP grants.

Conversely, project directors who felt supported by their awarded institution thought the educational organization's intention went beyond that of grant funding. One project director with a positive relationship with the awarded university said,

I can't tell you the amount of support that I get from the college because the college cabinet and the board of trustees, they know the value of these precollege programs. So they're in. They're in for the long haul.

In 2010, Jeremy Hall conducted a study on the differential cost-share burden between metropolitan and nonmetropolitan recipients of economic development grants in three southern states. Hall (2010) found that geographic isolation, low per capita income, and few resources stretched over large areas were more indicative of cost-share burden than population alone. Similarly, this study found that the project director's relationship with the prime applicant, be it a school district, college, or university, appeared a more accurate gauge of cost-share burden than the geographic area in which the project was located. Although metropolitan and nonmetropolitan projects may experience different challenges, whether the challenge is resolved or exacerbated is largely determined by the prime applicant's relationship with the GEAR UP grant and its staff.

Relationships between the prime applicant and project directors ranged on the continuum from heavily involved, which consisted of upper administration of the school district, college, or university, embracing the mission of the GEAR UP grant, understanding the cost-share requirements of the program, and desiring to create a

college-going culture in their community, to little involvement, which consisted of allowing the grant to operate within its schooling system or instructing individuals to apply for the grant but not fully understanding the administrative responsibilities and not aware or interested in the potential transformative results of the grant within the community.

### **Findings in Relation to Theory**

In 1976, Kahn et al. sought to characterize different types of bureaucratic encounters, which provided a nuanced definition of the broad phrase red tape. Kahn et al. (1976) classified bureaucratic encounters by differentiating the initiator of the action, bureaucrat or nonbureaucrat, and by distinguishing the direction of the transaction, internal or external. The framework generated a diagram that contains the following quadrants:

- I. Organizational behavior, where the person initiating the transaction and the person at whom it is directed are within the organization;
- II. Bureaucratic encounters where the person initiating the transaction is outside the organization to which that transaction is directed (e.g., an individual applying for public welfare benefits);
- III. Bureaucratic encounters where the person initiating the transaction is inside the organization and it is directed toward individuals outside the organization (e.g., law enforcement); and
- IV. Transactions where both the initiator and the person at whom it is directed are outside the organization. (Heinrich, 2016, p. 404)

Figure 2 (repeated for ease of reference) shows a visual representation of Kahn et al.'s (1976) classification of the four types of bureaucratic encounters:

**Figure 2**

*Kahn et al.'s Bureaucratic Encounters*

	<b>Intra.-Org.</b>	<b>Extra.-Org.</b>
<b>Intra.-Org.</b>	<p><b>I.</b></p> <p>Organizational behavior (leadership, peer relations, etc.)</p>	<p><b>II.</b></p> <p>Bureaucratic encounters (service, client relations, admissions, compensation, etc.)</p>
<b>Extra.-Org.</b>	<p><b>III.</b></p> <p>Bureaucratic encounters (law enforcement, taxation, sales, outreach, etc.)</p>	<p><b>IV.</b></p> <p>Transactions (family relations, friendships, neighborhood relations, etc.)</p>

*Note.* Adapted from “The Bite of Administrative Burden: A Theoretical and Empirical Investigation,” by C. J. Heinrich, 2016, *Journal of Public Administration Research and Theory*, 26(3), p. 404 (<https://doi.org/10.1093/jopart/muv034>).

Much of the literature on red tape involves quadrants two and three because those quadrants illustrate a transaction in which bureaucratic and nonbureaucrat participate.

The researcher assumed that this study would also examine this type of transaction, specifically a bureaucratic encounter illustrated by quadrant two, an extraorganizational to intraorganizational transaction. Cost-share, a transaction initiated by U.S. members of Congress, is imposed upon bureaucrats, GEAR UP project directors, to implement.

Although this type of transaction took place in this study, the more prevalent, or

important bureaucratic encounter in relation to GEAR UP match, is the encounter described by quadrant number one, an intraorganizational transaction.

What appeared to be more indicative of a successful GEAR UP grant was the bureaucratic encounter in which the prime applicant, the school district, college, or university, had a strong and positive relationship with those administering the GEAR UP grant. Although it was clear that a good relationship between school administrators and project directors would make for a successful grant, what was not apparent was the impediment of internal red tape in which project directors must navigate.

The researcher used Bozeman's (1993) theory of the etiology of red tape to explore whether match is a rule born bad or a good rule gone bad. However, based on the results of the researcher's quantitative survey, few project directors felt strongly about the cost-share requirement. What became evident via the follow-up interviews was that the educational organization's internal rules and regulations add to the grant's cost-share expectations. The resulting frustration, while appearing as match, is, in the researcher's opinion, internal red tape imposed by the educational organization. Although a couple of project directors the researcher spoke with still had an aversion to match, the educational institution's support helped the project director to circumvent any issues that would have made the grant unsuccessful.

### **Unexpected Findings**

The purpose of this study was to determine whether cost-share is simply a capricious administrative requirement of the GEAR UP grant. If it was determined that match was a superficial condition of the program, this study sought to determine to what extent it may be prohibitive in applying for and successfully administering an award.

However, based on the Likert scale averages, GEAR UP staff overall did not have a significant disdain for match. This was an unexpected finding. Furthermore, the researcher expected nonmetropolitan partnership grantees to vehemently disagree with the GEAR UP matching requirement more than their metropolitan counterparts. This was not the case. According to the quantitative data, there appeared to be no significant difference in metropolitan versus nonmetropolitan GEAR UP personnel's feelings toward cost-share. Finally, of the 23 participants who stated they would be willing to participate in the qualitative interview, none served an exclusively rural population. Therefore, the researcher cannot make any conclusions based on qualitative data about the differential cost-share burden between metropolitan and nonmetropolitan projects.

### **Conclusions**

This study sought to determine whether cost-share was a programmatic limitation of the GEAR UP grant and if it is to what extent it may be prohibitive in project administrators applying for and successfully administering a GEAR UP grant award. Overall, GEAR UP staff did not believe cost-share to be a programmatic limitation to the grant. Although project administrators would prefer to have the time devoted to match be spent on students and families, a majority of GEAR UP personnel believed the cost-share condition made their grant a more quality program. Furthermore, the matching requirement was not prohibitive in applying for the award. However, this may be due to the educational organization's intention in applying for the grant.

More than any other factor, the GEAR UP staff's relationship with the educational organization was the most indicative factor of successfully administering a GEAR UP partnership grant. Although it is common knowledge a genial relationship

between the GEAR UP staff and the prime applicant is a key component to a more efficient project, contentious relationships are further aggravated by the educational organization's internal red tape. Although the researcher set out to study external red tape placed on GEAR UP project directors by Congress in creating the GEAR UP grant, this study illuminated the difficulties project directors have navigating the prime applicant's internal rules and regulations.

Perhaps this phenomenon also extends to the South Dakota GEAR UP grant's woes. Although Scott Westerhuis may have just been a bad actor, conceivably a challenging relationship between Mid-Central Educational Cooperative (MCEC) and South Dakota Department of Education (SDDOE) was further irritated by SDDOE's internal red tape, or maybe SDDOE's red tape was a purposeful check and balance of MCEC's management of the grant. As Kaufman (1997) said, "one person's 'red tape' may be another's treasured safeguard" (p. 1).

### **Implications for Action**

Based on these findings, the researcher recommends those educational organizations interested in applying for a GEAR UP grant assess their desire to apply. Is the educational organization interested in creating a college-going culture? Or does the educational organization simply want another revenue stream? Once awarded, educational organizations need to look carefully at their own policies and procedures. Because the GEAR UP grant itself is complex with different awards, implementation styles, and the matching requirement, additional red tape from the educational institution could distract from the meaningful work conducted by GEAR UP staff. In addition,

arbitrary internal red tape can deteriorate the relationship between GEAR UP personnel and the educational institution.

### **Recommendations for Further Research**

The researcher was not able to make any conclusions on rural GEAR UP partnership grantee's experiences or perceptions of the GEAR UP cost-share requirement as a result of her qualitative sample. Therefore, the researcher recommends further research be conducted exclusively with rural GEAR UP partnership project directors. In addition, based on the results of this study, the researcher recommends further research be conducted concerning the intent and assumptions of matching grants applying Bozeman's (1993) lens of the etiology of red tape. Specifically, the researcher recommends further research be conducted to determine whether cost-share, either the GEAR UP grant or the other federal grants, is a good rule gone bad or a rule born bad. Depending on what is determined, further research could explore which of the nine reasons match is a good rule that went bad: (a) rule drift, (b) rule entropy, (c) change in implementation, (d) change in the functional object, (e) change in the rule's efficacy, (f) rule strain, (g) accretion, or (h) misapplication or which of the five reasons match is a rule born bad: (a) inadequate comprehension, (b) self-aggrandizement and illegitimate functions, (c) negative sum compromise, (d) overcontrol, or (e) negative sum process.

### **Concluding Remarks and Reflections**

For the researcher, the dissertation process was unlike one ever undertaken in her academic career. The researcher wrestled with the fact that a dissertation is not persuasive in nature and that the outcome of the research may not be what the researcher would have preferred. Truthfully, the majority of the researcher's hypotheses were wrong. However,

this experience allowed the researcher to confront her biases, and she enjoyed the opportunity to work with individuals in the education community once again. Their passion and expertise have helped thousands of low-income students enter and succeed in postsecondary education. This same passion and expertise are the common dominators in successful GEAR UP grants and quality educational systems. Those individuals who are invested in and take ownership of their educational obligation contribute to effective GEAR UP grants and educational systems. Likewise, those without a sense of proprietorship contribute to the GEAR UP grants' demise and also the larger educational systems' demise.



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## APPENDICES

## APPENDIX A

### GEAR UP PARTNERSHIP GRANT MATCH WAIVER OPTIONS

Waiver Option	How long?	What evidence or documentation must be provided?	Authority
Up to 75% of the match requirement	Up to 2 years	The applicant must demonstrate a significant economic hardship that stems from a specific, exceptional, or uncontrollable event, such as a natural disaster, that has a devastating effect on the members of the Partnership and the community in which the project would operate.	34 CFR §694.8(a)
Up to 50% of the match requirement	Up to 2 years	<p>The applicant must demonstrate a pre-existing and an on-going significant economic hardship that precludes the applicant from meeting its matching requirement. The Department may consider the following documentation—</p> <ul style="list-style-type: none"> <li>• Severe distress in the local economy of the community to be served by the grant (e.g., there are few employers in the local area, large employers have left the local area, or significant reductions in employment in the local area);</li> <li>• Local unemployment rates that are higher than the national average;</li> <li>• Low or decreasing revenues for State and County governments in the area to be served by the grant</li> <li>• Significant reductions in the budgets of IHEs that are participating in the grant; or</li> <li>• Other data that reflect a significant economic hardship for the geographical area served by the applicant.</li> </ul>	34 CFR §694.8(b)(1-2)

Tentative approval of up to 50% waiver	All remaining years of the project period	<p>In order to exercise this waiver option, applicants must also request approval for the 50% option described in Option (b), above, in their application. Thereafter, grantees must submit to the Department every two years documentation that demonstrates—</p> <ul style="list-style-type: none"> <li>• The significant economic hardship upon which the waiver was granted still exists; and</li> <li>• The grantee tried diligently, but unsuccessfully, to obtain contributions needed to meet the matching requirement.</li> </ul>	34 CFR §694.8(b)(3)
Matching funds for scholarships count as double match	For the duration of the project period	An applicant must propose a scholarship component and indicate that the scholarship program will be funded through matching funds. Thereafter, for every scholarship dollar provided as match, it counts as two matching dollars towards the GEAR UP program dollar-for-dollar matching requirement.	34 CFR §694.8(c)
Up to 70% of the total match requirement	For the duration of the project period	<p>Partnership applicants must—</p> <ul style="list-style-type: none"> <li>• Have three or fewer IHEs;</li> <li>• Be a fiscal agent that is eligible to receive funds under title V (Developing Institutions), or Part B of title III (a Historically Black College or University), or section 316 or 317 of the HEA (an American Indian Tribally Controlled College and University or Alaska Native and Native Hawaiian-Serving Institution), or be an LEA;</li> <li>• Only have participating schools with a 7th grade cohort in which at least 75 percent of the students are eligible for free or reduced-price lunch; and</li> <li>• Only have LEAs in which at least 50 percent of the students enrolled are eligible for free or reduced-price lunch.</li> </ul>	34 CFR §694.8(d)

In general, applicants should provide *detailed and comprehensive* evidence and documentation to support their matching requests. Match requests lacking sufficient justification may not be granted at all or may be granted for amounts smaller or for a shorter time period than requested. (U.S. Ed., 2022b, Question 18)

## APPENDIX B

### 2011 SOUTH DAKOTA GEAR UP GRANT PERFORMANCE MEASURES



Objective 1: Increase the academic performance and preparation for postsecondary education of GEAR UP students	
1.1	The average daily attendance of GEAR UP South Dakota (GUSD) will exceed that of non-GUSD students each year.
1.2	85% of GUSD students will be promoted to the next grade level on time each year.
1.3	<b>The percentage of GUSD students who pass Pre-algebra by the end of the 8<sup>th</sup> grade will increase by 10% over the baseline.</b>
1.4	<b>The percentage of GUSD students who pass Algebra I by the end of the 9<sup>th</sup> grade will increase by 10% over the baseline.</b>
1.5	The percentage of GUSD students who complete the PLAN or Preliminary Scholastic Aptitude Test (PSAT) by the end of the 10 <sup>th</sup> grade will increase by 10% over the baseline.
1.6	The percentage of GUSD students who complete the Scholastic Aptitude Test (SAT) or American College Test (ACT) by the end of 11 <sup>th</sup> grade will increase by 10% over the baseline.
1.7	The percentage of GUSD students who have an unweighted Grade Point Average (GPA) of at least 3.0 on a 4-point scale by the end of 11 <sup>th</sup> grade will increase by 10% over the baseline.
1.8	<b>The percentage of GUSD students who take two years of mathematics beyond Algebra I by 12<sup>th</sup> grade will increase by 10% over the baseline.</b>
1.9	The percentage of GUSD students in grades 6, 7, 8 & 11 performing at or above proficiency in math on the state assessment test will increase by 10% each year.
1.10	The percentage of GUSD students in grades 6, 7, 8 & 11 performing at or above proficiency in reading on the state assessment test will increase 10% each year.
1.11	<b>The percentage of GUSD parents who actively engage in activities associated with assisting students in their academic preparation for college will increase by 10% each year.</b>
Objective 2: Increase the educational expectation of GEAR UP students, and increase student and family knowledge of postsecondary education options, preparation, and financing.	
2.1	<b>Increase the percentage of GUSD students who graduate high school, compared to the state average, by 2018.</b>
2.2	<b>50% of GUSD students will be enrolled in a postsecondary educational institution by 2018.</b>
2.3	<b>50% of GUSD students who enroll in postsecondary education will place into college-level math without need for remediation by 2018.</b>
2.4	<b>50% of GUSD students who enroll in postsecondary education will place into college-level English without need for remediation by 2018.</b>
2.5	50% of former GUSD will be enrolled in a postsecondary educational institution by 2019.
2.6	55% of GUSD students will have accumulated the expected number of credit hours for their chosen degree in their first year attending a postsecondary education institution.

2.7	55% of former GUSD students will have accumulated the expected number of credit hours for their chosen degree each year starting in 2019.
Objective 3: Increase the educational expectation of GEAR UP students, and increase student and family knowledge of postsecondary education options, preparation, and financing.	
3.1	The percentage of GUSD students who demonstrate knowledge on the benefits of pursuing a postsecondary education will increase by 10% each year.
3.2	<b>The percentage of GUSD students who demonstrate knowledge of the academic preparation necessary for postsecondary education will increase by 10% each year.</b>
3.3	The percentage of GUSD students who demonstrate knowledge on the cost of pursuing postsecondary education will increase by 10% each year.
3.4	The percentage of GUSD students who demonstrate knowledge on the availability of financial aid will increase by 10% each year (this includes Free Application for Federal Student Aid (FAFSA) completion).
3.5	65% of GUSD students will aspire to continue their education after high school.
3.6	The percentage of GUSD parents who demonstrate knowledge on the benefits of pursuing a postsecondary education will increase by 10% each year starting in 2016.
3.7	<b>The percentage of GUSD parents who demonstrate knowledge on the costs of pursuing postsecondary education will increase by 10% each year starting in 2016.</b>
3.8	The percentage of GUSD parents who demonstrate knowledge on the availability of financial aid will increase by 10% each year starting in 2016.

*\*The bolded performance measures indicate those measures required by the GPRA Act of 1993.*

## APPENDIX C

### DECEMBER 2020 COVID-19 MATCH WAIVER FLEXIBILITY LETTER



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

December 3, 2020

Dear GEAR UP Grantee Project Director:

Due to the continuing national emergency caused by Coronavirus Disease 2019 (COVID-19) and the impact of COVID-19 on State, local, and grantee budgets, we at the Office of Postsecondary Education (OPE) wanted to take this opportunity to reiterate the match waiver flexibilities that are available to Gaining Early Awareness for Undergraduate Programs (GEAR UP) partnership grantees and offer those same flexibilities to our GEAR UP State grantees.

As you are aware, the GEAR UP program requires that grantees provide, from State, local, institutional, or private funds, not less than 50 percent of the cost of the program, which matching funds may be provided in cash or in kind and may be accrued over the full duration of the grant award period.<sup>1</sup> This is commonly known as a dollar-for-dollar match requirement—that is, generally, for every federal dollar provided under the grant, grantees must provide one dollar in matching funds.

The GEAR UP program regulations in [34 CFR part 694](#) offer GEAR UP partnership grantees multiple flexibilities regarding this match provided they demonstrate sufficient need and receive approval from the Department. Pursuant to section 3518(b) of the CARES Act, the Department will also offer these same flexibilities to all GEAR UP State grantees.

The purpose of this letter is to reiterate those match waiver flexibilities and describe the process for requesting such a waiver.

GEAR UP grantees may apply for the following match waivers:

1. Waiver of up to 75% of the match requirement for up to 2 years (natural disaster or similar);
2. Waiver of up to 50% of the match requirement for up to 2 years (matching funds no longer available and sources exhausted); or
3. Waiver extension - if a grantee already has a waiver, they may request that the Department waive up to 50 percent of the matching requirement for a period of up to two years beyond the expiration of any previous waiver.

<sup>1</sup> See 20 USC 1070a-23(b)(1) and [34 CFR § 694.7](#) for a description of the matching requirement.

The GEAR UP regulations ([34 CFR § 694.9](#)) specify what standard grantees must meet for each type of waiver, as follows:<sup>2</sup>

Type of Waiver	Standard
1 - Waiver of up to 75% of the match requirement for up to 2 years	Grantee must demonstrate that matching contributions from the original application are no longer available due to an uncontrollable event, such as a natural disaster, that has a devastating economic effect on members of the Partnership and the community in which the project would operate.
2 - Waiver of up to 50% of the match requirement for up to 2 years	Grantee must demonstrate that: (a) The matching contributions described for those two years in the grantee's approved application are no longer available; and (b) The grantee has exhausted all funds and sources of potential contributions for replacing the matching funds.
3 - Waiver Extension	Up to 50 percent of the matching requirement for a period of up to two years beyond the expiration of any previous waiver

In determining whether the grantee has exhausted all funds and sources of potential contributions for replacing matching funds, the Secretary considers the grantee's documentation of key factors such as the following and their direct impact on the grantee:

1. A reduction of revenues from State government, County government, or the local educational agency (LEA).
2. An increase in local unemployment rates.
3. Significant reductions in the operating budgets of institutions of higher education that are participating in the grant.
4. A reduction of business activity in the local area (e.g., large employers have left the local area).
5. Other data that reflect a significant decrease in resources available to the grantee in the local geographical area served by the grantee.

Grantees requesting a match waiver should specifically note which type of waiver is being requested, the timeframe for the waiver, the amount of matching funds the waiver request, if granted, would waive, and are encouraged to provide detailed evidence and documentation to support their match waiver request.

Match waiver requests lacking sufficient justification may not be granted at all or may be granted for amounts smaller or for a shorter time period than requested. Any requests must continue to adhere to the requirement to be reasonable and necessary under [Subpart E of 2 CFR part 200](#), the Cost Principles of the *Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards* (Uniform Guidance).

<sup>2</sup> State grantees should use these same categories in requesting their match waiver and tailor their request to the area where the State GEAR UP project is providing services depending on their specific State grant (Statewide, regional, or local).

If a grantee is requesting a match waiver as a result of COVID-19, the Department will entertain the possibility of a retroactive match waiver from March 13, 2020, the date of the President's declaration of a national emergency due to COVID-19.

Thank you for your continued commitment to support GEAR UP participants during this time through the ongoing delivery of services to them. Please contact your assigned program specialist if you have any questions.

Sincerely,



Christopher J. McCaghren, Ed.D.  
Deputy Assistant Secretary  
Higher Education Programs

## APPENDIX D

### MARCH 2021 COVID-19 MATCH WAIVER FLEXIBILITY LETTER



**UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION**

March 25, 2021

Dear GEAR UP Grantee Project Director:

Due to the continuing national emergency caused by Coronavirus Disease 2019 (COVID-19) and pursuant to the authority granted under section 3518(b) of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the Office of Postsecondary Education (OPE) is now providing financial flexibility and relief for Gaining Early Awareness for Undergraduate Programs (GEAR UP) grantees. This letter supersedes and replaces the letter regarding match waiver flexibilities that was issued by OPE on December 3, 2020.<sup>1</sup>

As you are aware, the GEAR UP program requires that grantees provide, from State, local, institutional, or private funds, not less than 50 percent of the cost of the program, which matching funds may be provided in cash or in kind and may be accrued over the full duration of the grant award period.<sup>2</sup> This is commonly known as a dollar-for-dollar match requirement—that is, generally, for every federal dollar provided under the grant, grantees must provide one dollar in matching funds.

OPE invites all GEAR UP grantees (both Partnership and State grantees) to request waivers of up to 100 percent of the matching requirement from the date of the declaration of the of the national emergency due to COVID-19, subject to the criteria and limitations listed below:

1. Grantees must submit the form for a waiver of the matching requirement to their assigned GEAR UP program specialist. This form will be forthcoming shortly.
2. Waivers granted under this authority will end no later than September 30 of the fiscal year following the end of the COVID-19 national emergency, which currently is September 30, 2022.
3. Waivers will only be granted under this authority if you certify that, to the maximum extent practicable, the GEAR UP project will continue to serve the same number of students and maintain the quality and intensity of the services provided to such students.
4. If a State grantee did not received a waiver of the GEAR UP scholarship component, that project will continue to provide GEAR UP students with scholarships.

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<sup>1</sup> The superseded letter is available here: <https://www2.ed.gov/about/offices/list/ope/covid-gearup-matchflexletter.pdf>.

<sup>2</sup> See 20 USC 1070a-23(b)(1) and 34 CFR § 694.7 for a description of the GEAR UP program matching requirement.



OPE will release a waiver request form shortly. Grantees requesting a match waiver should specifically note on the form the timeframe for the waiver and the amount and percentage of matching funds the waiver, if granted, would waive. Incomplete forms may not be granted at all or may be granted for amounts smaller or for a shorter time period than requested.

If a grantee is requesting a match waiver as a result of COVID-19, the Department will entertain the possibility of a retroactive match waiver from March 13, 2020, the date of the President's declaration of a national emergency due to COVID-19 (85 FR 15337).

Thank you for your continued commitment to support GEAR UP participants during this time through the ongoing delivery of services to them. Please contact your assigned GEAR UP program specialist if you have any questions.

Sincerely,

Michelle Asha Cooper, Ph.D.  
Acting Assistant Secretary for  
Postsecondary Education.

APPENDIX E  
MATCH WAIVER REQUEST FORM

**Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP)**  
**Match Waiver Request Form**

The purpose of this form is to allow GEAR UP grantees to take advantage of the program match requirement flexibilities provided by section 3518(b) of the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

Grantee name: \_\_\_\_\_ PR/Award Number: \_\_\_\_\_

**Section 1: Calculating the Amount of Match to Request Waived**

Row 1	Full award amount for entire length of project: (From your approved application.)	\$ _____
Row 2	Project start date: (See GAN box 6.)	_____
Row 3	Project end date: (See GAN box 6.)	_____
Row 4	Total number of days in project: <sup>1</sup>	_____ days
Row 5	Daily match requirement: (Divide the amount in row 1 by the number of days in row 4.)	\$ _____
Row 6	Requested <u>start</u> date for waiver of matching requirement: (Select March 13, 2020 or specify another later date. March 13, 2020 is the earliest start date that may be requested as the date of declaration of a national emergency due to the pandemic.)	<input type="checkbox"/> <b>March 13, 2020</b> <input type="checkbox"/> Other date: _____
Row 7	Requested end date for waiver of matching requirement: (Select September 30, 2023 or specify another earlier date. September 30, 2023 is the latest end date that may be requested under CARES Act § 3518(b).)	<input type="checkbox"/> <b>September 30, 2023</b> <input type="checkbox"/> Other date: _____
Row 8	Number of days between the date entered in row 6 (requested start date) and the date entered in row 7 (requested end date): (If you selected "March 13, 2020" in row 6 and "September 30, 2023" in row 7, select "1,296 days" in this row, otherwise enter the calculated number of days.)	<input type="checkbox"/> <b>1,296 days</b> <input type="checkbox"/> _____ days
Row 9	Maximum matching requirement that may be waived. (Multiply the amount in row 5 by the number of days in row 8.)	\$ _____

<sup>1</sup> There are various online calculators to simplify this calculation.

**Section 2: Requested Waiver of Matching Requirement**

I request a waiver of \_\_\_\_\_ (specify percentage) of the matching requirement specified in Section 1, Row 9 for the GEAR UP award specified above as a result of the COVID-19 pandemic for the period beginning on date specified in Section 1, Row 6 and ending on the date specified in Section 1, Row 7.

**Section 3: Certifications**

I understand that any waiver provided will be time limited and will not cover the full project period.

I certify that to the maximum extent practicable, my project will continue to serve the same number of students and maintain the quality and intensity of the services provided to such students.

If my project includes participation in the GEAR UP scholarship component, I certify that the project will maintain compliance with the requirements of the scholarship component described in 20 U.S.C. § 1070a-25 and implementing GEAR UP regulations in 34 C.F.R. part 694.

I further certify that if my State project did not receive a waiver of the scholarship component, that project will continue to provide GEAR UP students with scholarships as required by 20 U.S.C. § 1070a-25(b)(2) and 34 C.F.R. § 694.14(c).

To the best of my knowledge and belief, all of the data and information in this submission are true and correct and I acknowledge that failure to submit accurate data or information may result in liability under the False Claims Act, 31 U.S.C. § 3729, *et seq.*; OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement) in 2 C.F.R. part 180, as adopted and amended as regulations of the Department in 2 C.F.R. part 3485; and 18 U.S.C. § 1001, as appropriate, and other enforcement actions.

Name of Authorized Representative (typed):

\_\_\_\_\_

Signature of Authorized Representative (signed):

\_\_\_\_\_

Date:

\_\_\_\_\_

**Public Burden Statement**

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1840-NEW. Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Coronavirus Aid, Relief, and Economic Security (CARES) Act). If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, application or survey, please contact Ben Witthoeft ([Ben.witthoeft@ed.gov](mailto:Ben.witthoeft@ed.gov)) directly.

## APPENDIX F

### EXECUTED MOU BETWEEN RESEARCH AND NCCEP



National Council for Community and Education Partnerships  
EXCEL | PROVE | MOBILIZE

May 5, 2022

To: California Baptist University  
From: Alex Chough, NCCEP President

This letter acknowledges that the National Council for Community and Education Partnerships (NCCEP) is willing to provide certain assistance to Ms. Sophie Johnson, a candidate in the Doctor of Public Administration program at California Baptist University (CBU), in support of her research project titled *The GEAR UP Differential Cost-Share Burden for Metropolitan and Nonmetropolitan Projects* as further described in Ms. Johnson's IRB application. We understand the purpose of this research is to determine the differential impacts the GEAR UP grant's cost-share component has on metropolitan and nonmetropolitan Partnership grantees. We understand the research project is expected to be completed by the end of 2022.

Our assistance is conditioned on Ms. Johnson's research being conducted under the supervision of Dissertation Chair, Dr. Brian Guzzetta, and in the manner described in the IRB application approved by CBU. Further no publications nor public statements about the research project may indicate or suggest that NCCEP sponsors the research or that Ms. Johnson's opinions and conclusions reflect the views or opinions of NCCEP or any of its officers or directors. We reserve the right to review all such publications and statements prior to public release, though we will not have the right to edit such publications or statements except to the extent they do not comply with the preceding sentence. Further, NCCEP does not guarantee any response rate, given the voluntary nature of the information collection.

We will provide the following assistance:

- NCCEP will email Project Directors of GEAR UP Partnership grants and share a link to a brief online survey on Monday, May 9, 2022 (Day 1)
- NCCEP will share a link to a brief online survey on their Facebook and Twitter pages on Monday May 9, 2022 (Day 1)
- NCCEP will disburse a follow-up email reminding Project Directors of GEAR UP Partnership grants to take the survey on Tuesday, May 17, 2022 (Day 7)
- NCCEP will share a link to a brief online survey on their Facebook and Twitter pages reminding Project Directors of GEAR UP Partnership grants to take the survey on Tuesday, May 17, 2022 (Day 7)
- NCCEP will send a final email indicating the survey will close at the end of the day Friday, May 20, 2022 (Day 11)
- NCCEP will share a link to a brief online survey on their Facebook and Twitter pages a final time indicating the survey will close at the end of the day Friday, May 20, 2022 (Day 11)

Sincerely,

Alex Chough, President  
National Council for Community and Education Partnerships

1331 H ST NW  
Suite 900  
Washington, DC 20005

APPENDIX G  
IRB APPROVAL



**CC: Institutional Review Board**

**RE:** IRB Review  
**IRB No.:** 067-2122-EXP

**Project:** The GEAR UP Differential Cost-Share Burden for Metropolitan and Nonmetropolitan Projects

**Date Complete Application Received:** 2/12/22  
**Date Final Revision Received:** 3/10/22

**Principle Investigator:** Sophie Johnson  
**Faculty Advisor:** Brian Guzzetta

**College/Department:** OPS

**IRB Determination:** Expedited Application **Approved** – Student research using de-identified survey questionnaires/interviews; no minor participants; no more than minimal risk/risk appropriately mitigated; no deception utilized; acceptable consent procedures and documentation; acceptable data protection procedures. Data collection may begin, in accordance with the final submitted documents and approved protocol.

**Future Correspondence:** All future correspondence about this project must include all PIs, Co-PIs, and Faculty Advisors (as relevant) and reference the assigned IRB number.

**Approval Information:** In the case of an unforeseen risk/adverse experience, please report this to the IRB immediately using the appropriate forms. Requests for a change to protocol must be submitted for IRB review and approved prior to implementation. At the completion of the project, you are to submit a Research Closure Form.

**Researcher Responsibilities:** The researcher is responsible for ensuring that the research is conducted in the manner outlined in the IRB application and that all reporting requirements are met. Please refer to this approval and to the IRB handbook for more information.

**Date:** March 15, 2022

APPENDIX H

QUANTITATIVE SURVEY QUESTIONS

1. Do you currently work for a GEAR UP grant in some capacity?
  - a. Yes
  - b. No (answering no will end the survey)
2. What is your position in relation to the GEAR UP grant?
  - a. (Options: Principal Investigator, Co-Principal Investigator, Project Director, Assistant Director, Business Manager, Data Support Specialist, Program Evaluator, Other (please specify))
3. How long have you worked on or for the GEAR UP grant?
  - a. 0-2 years
  - b. 2-4 years
  - c. 4-6 years
  - d. 6-8 years
  - e. 8+ years
4. What is the title of your GEAR UP grant?
  - a. (Fill in the blank)
5. Is your grant a State or Partnership grant?
  - a. State (answering State grant ends the survey)
  - b. Partnership
6. In what state(s) does your GEAR UP project operate?
  - a. (A drop-down list of all 50 states)
7. Does your GEAR UP project serve students and families in a primarily rural or urban location?
  - a. Rural
  - b. Urban
8. What year of your performance period is your project in?
  - a. (A drop-down list with options of years 1-7 and no-cost extension)
    - i. Selecting year 6 or 7 will bring the participant to an additional question
9. (Additional question) Is this the final year of your performance period?
  - a. Yes
  - b. No
  - c. Unknown
10. Has your GEAR UP grant ever received a match waiver?
  - a. Yes
  - b. No
  - c. Unknown

The next set of questions will be based on your opinions of the GEAR UP program.

11. The GEAR UP matching requirement encourages my grant to be a higher quality program.
  - a. 1 = Strongly agree
  - b. 2 = Somewhat agree
  - c. 3 = Somewhat disagree
  - d. 4 = Strongly disagree
12. If there was no GEAR UP matching requirement, our project could serve students better.
  - a. 4 = Strongly agree
  - b. 3 = Somewhat agree
  - c. 2 = Somewhat disagree
  - d. 1 = Strongly disagree
13. The GEAR UP matching requirement made our organization hesitant in applying for the GEAR UP grant.
  - a. 4 = Strongly agree
  - b. 3 = Somewhat agree
  - c. 2 = Somewhat disagree
  - d. 1 = Strongly disagree
14. The following percentage indicates my grant's time spent tracking and obtaining match to meet the GEAR UP matching requirement as a percentage of total time working on the grant. If you currently have a COVID-19 match waiver, please answer time spent before the waiver.
  - a. 0-20% of total grant time
  - b. 20-40% of total grant time
  - c. 40-60% of total grant time
  - d. 60% or more of total grant time
15. If you would be willing to provide more information on your project's experience with GEAR UP match, please select the box below:
  - a. Yes, I would like to share more about my project's experience with match.
  - b. No, I would not like to share more about my project's experience with match.
16. Please provide your email address.

APPENDIX I

QUALITATIVE INTERVIEW QUESTIONS

1. Can you briefly describe your roles and responsibilities as it pertains to the gear up grant?
2. In your opinion, have students and families in your area benefitted from your organization's GEAR UP grant award? Please give an example.
3. What involvement do you have, if any, in gathering and tracking match for your organization?
4. On the quantitative survey, you answer that the matching requirement of the grant does not make your program a more quality program. Could you please explain your answer?
5. As an administrator, do you think the effort involved in gathering match is proportional to the benefit to students and families? Why or why not?
6. Over the last several months, projects have not been required to gather match due to the stresses of COVID-19. How has the COVID-19 match waiver affected your program?
7. Was your organization apprehensive in applying for the GEAR UP grant because of the cost-share requirement? Why or why not?
8. Do you feel the matching requirement of the grant impacts metropolitan and nonmetropolitan projects equally? Why or why not?
9. Is there anything else you would like to share with me regarding the GEAR UP grant?