

Congress of the United States
Washington, DC 20515

April 18, 2007

Honorable Margaret Spellings
Secretary of Education
400 Maryland Avenue, SW
Washington, DC 20009

Dear Secretary Spellings,

We write with concern about the implementation of the proposed evaluation of Upward Bound (UB), participation in which is an Absolute Priority for funding in the current competition. While we believe in the importance of evaluation, we believe the study's design is flawed and are troubled by the expedited manner in which the evaluation is being carried out.

The study proposes to use the classical medical research model of a treatment group and a control group. Participating programs would be required to recruit twice as many students as they can actually serve. Half of the recruits would be assigned by the evaluator to the program, the treatment group, and the other half would constitute the control group. The validity of the study hinges on the purity of the control group and the extent to which the behavior and/or the environment can be controlled. The results of the previous Mathematical Policy Research Evaluation of Upward Bound were compromised by this type of validity issue - nearly 30% of the so-called control group received TRIO services from other sources, making the comparison to the actual UB participants unreliable. While the proposed study would bar students selected for the control group from participating in Upward Bound in the future, there is no prohibition from participation in other pre-college programs, which undermines the reliability of the study's findings.

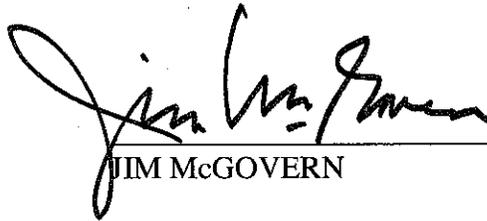
In addition, the Department's goal of implementing the study to capture participants recruited for the summer of 2007 is not a reasonable expectation given that most programs in Massachusetts have already distributed application materials to students. These students are working on applications without knowing that they may become part of a random assignment study and have not been supplied the forms needed by evaluators to collect baseline data. As of this writing, Upward Bound programs have not received these baseline data forms for use, which, when posted for public comment in December 2006, totaled 12 pages. To inform students of their participation in the study and require this extra paperwork after they have in good faith applied to a program is wrong, and at the very least suggests the need to postpone the timeline for implementation.

Finally, the experimental design proposed for this study is unnecessary and should be replaced by a quasi-experimental design. A quasi-experimental design could be used to compare Upward Bound students and program data to the existing, known data on a matched population--a scientifically sound design that does not use a medical model and a human control group on a vulnerable population. This matched design is the same methodology used by the Department in a recent evaluation of Talent Search and would allow the Department's financial resources, which are expended annually to gather and process program annual performance data, to be used for an effective product that could be disseminated to the Upward Bound community and others to inform practice and policy.

Given the nature of our concerns, we ask that implementation be delayed until the study's design and timing can be properly addressed.



BARNEY FRANK



JIM McGOVERN



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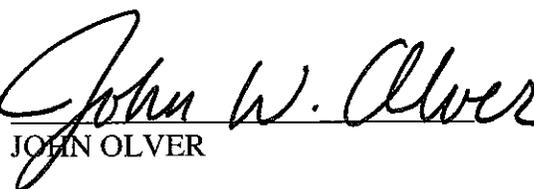
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WILLIAM DELAHUNT



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