

**Congress of the United States**  
**Washington, DC 20515**

November 30, 2011

The Honorable Arne Duncan  
Secretary  
U.S. Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Dear Secretary Duncan,

We write to urge you to reconsider a recent proposal from the Department of Education (ED) that would negatively impact the Upward Bound (UB) Federal TRIO program for high school students in the U.S. territories, as well as numerous colleges, agencies and organizations across the country. The proposed changes to the application, which were published on October 31, 2011, would force institutions to reduce per-student costs in UB and effectively limit the amount of services they can provide. This proposal also puts the territories of Guam, American Samoa, the Commonwealth of the Northern Marianas Islands, and the U.S. Virgin Islands at a disadvantage in competing for new projects, and would undermine the intent of the grants—to provide needed services to disadvantaged youth to enable them to succeed in their postsecondary pursuits.

As you are aware, the UB program provides critical resources and support for high school students from low-income families looking to gain a competitive edge in the college admissions process. The UB grants support projects that provide participants with access to academic guidance, entrance exam workshops, tutorial services, financial aid and scholarship information, and summer programs that include opportunities to earn high school credit. Maintaining access to these resources is important, especially in underserved areas like the territories where inequities in education continue to exist and many students do not have access to the same educational opportunities as their counterparts in the states.

In the U.S. territories, the promise of equal access to quality education has not yet been fully realized. Significant disparities continue as many federal funding opportunities are subject to caps and set-asides, severely limiting the resources available to students in our districts. The proposed changes to the UB application would compound this problem forcing UB programs in the territories to reduce the quality of their current projects and, in the case of programs located in four of the five territories, impair their ability to compete for new awards. Specifically, Competitive Preference Priority #1 gives priority for students enrolled in persistently lowest-achieving (PLA) schools. ED typically determines PLA schools, and awards School Improvement Grant funding, through criteria set under Title I, section 1003, of the Elementary and Secondary Education Act. However, the territories of Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and the U.S. Virgin Islands receive consolidated Title I funding and

consequently do not collect data on lowest achieving schools. As such, institutions from these insular areas are precluded from applying under Competitive Preference Priority #1 and are automatically at a disadvantage in competing for new projects or continuing an existing project. The exclusion of UB programs from these jurisdictions simply because ED does not collect data on PLA schools outside of the fifty states and Puerto Rico is unjust and runs counter to President Obama's stated policy goals of fostering equity and opportunity for all students.

Moreover, cuts that UB programs would have to make to remain eligible for a full award would have a disproportionately detrimental impact on programs in the territories, where it often costs more per-student to provide the same services provided in the states. Increasingly high travel costs would in effect prohibit students from participating in conferences, or other educational programs offered in the states. As such, it is important that participating institutions, particularly in the territories, receive an adequate level of funding to ensure equitable access to quality education for all students. Yet the proposal under consideration would require many UB programs in the territories to reduce their per-student costs in order to maintain their current level of funding and to reduce these costs by an even greater amount to increase their program's funding.

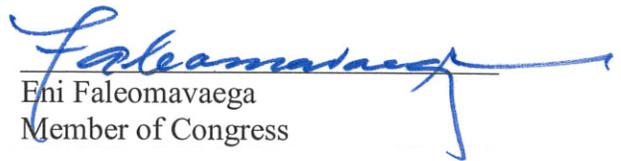
The proposed changes to UB would diminish equal access to education for students in the U.S. territories, and we strongly urge ED to reconsider. The Competitive Preference Priority #1 must be changed so that UB programs in the insular areas are not excluded from competing. In all of the territories and the rest of the United States, UB programs whose per-student costs exceed \$4,500 should not be penalized with decreased funding and those programs whose per-student costs are between \$4,200 and \$4,500 should be able to seek an increase in funding.

Our students must receive adequate resources if they are to compete with their counterparts throughout the country and around the world. We hope to work with you to strengthen our nation and to provide our students with the necessary skills and education to succeed.

Sincerely,



Madeleine Z. Bordallo  
Member of Congress



Eni Faleomavaega  
Member of Congress



Gregorio Kilili Camacho Sablan  
Member of Congress



Pedro R. Pierluisi  
Member of Congress

A handwritten signature in cursive script, appearing to read "Donna Christensen", written in black ink.

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Donna Christensen  
Member of Congress