



Office of the President

1720 Van Hise Hall
1220 Linden Drive
Madison, Wisconsin 53706-1559
(608) 262-2321
(608) 262-3985 Fax

email: kreilly@uwsa.edu
website: <http://www.uwsa.edu>

August 2, 2006

Geraldine Smith
U.S. Department of Education
1990 K Street, NW
Room 7020
Washington, D.C. 20006-8512

Dear Ms. Smith:

On behalf of the 13 four-year and 13 two-year universities and the 160,000 students of the University of Wisconsin System, I am writing to detail our objections to the U.S. Department of Education's proposed restrictions on student eligibility for the Upward Bound program. These changes were announced in the "Notice of Proposed Priority" published in the *Federal Register* on July 3.

TRIO programs that allow low-income students, first-generation college students, and students with disabilities to begin and complete a postsecondary education are essential to the University of Wisconsin System institutions. As UW System institutions continue to focus efforts to increase diversity, especially across the sciences, UW System has been pleased with the support it has received from the Upward Bound and Upward Bound Math and Science programs – totaling more than \$4 million in FY05.

Our success rate is impressive. For example, at UW-River Falls, 100 percent of Upward Bound students are accepted to a postsecondary institution. At UW-Green Bay, 92 percent of Upward Bound Math/Science students enroll in college, and 100 percent of UW-Manitowoc Upward Bound students enroll in postsecondary education. There are similar statistics across the UW System.

Upward Bound programs at UW institutions report that it is essential to support students throughout their high school careers if success rates like those mentioned above are to be achieved. Students in these categories are at constant risk for events in their lives and those of their families that throw them off the track toward college. A brief, early intervention simply is not enough to overcome these unexpected events. Furthermore, the tutoring and enrichment services provided through Upward Bound are effective in supplementing the offerings of high schools that frequently struggle with complex populations of students as well as inadequate funding to meet students' needs.

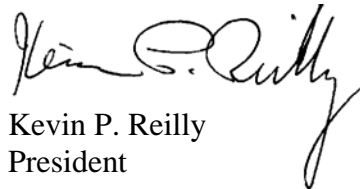
Geraldine Smith
August 2, 2006
Page Two

Under federal law, Upward Bound has a broad focus: to provide grants to support academic, counseling, tutoring and mentoring services and work-study programs to help low-income high school students prepare for college. These broad categories allow the programs and directors to select students most in need from the target schools and populations. The proposed changes would narrow the services that Upward Bound provides so that only students in the 9th grade would be eligible to participate. The proposal would effectively deprive students in the 10th and 11th grades of the program's benefits. We are also concerned that the proposal requires 30 percent of all newly-admitted Upward Bound students be "at high academic risk for failure."

Further, the proposed changes by the U.S. Department of Education would take away authority to determine the best way to meet student needs and essentially substitute a new program, without congressional authorization, for a program previously authorized and funded. This approach sets a precedent that could impose additional eligibility requirements on other Title IV and TRIO programs.

We urge you to continue to make access and graduation from higher education this country's highest priority for all students. This is especially important for those coming from limited-income backgrounds and who are first in their families to attend college. Thank you for your consideration.

Sincerely,



Kevin P. Reilly
President

cc: Wisconsin Congressional Delegation
Terry Hartle, ACE
Chancellors
Cabinet
Larry Rubin
Vicki Washington