

August 23, 2024

The Honorable Nasser Paydar
Assistant Secretary for Postsecondary Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Submitted electronically

Re: Federal TRIO Eligibility Proposed Rule

Docket ID: ED-2024-OPE-0050

Dear Assistant Secretary Paydar,

We, the 75 undersigned community, civil rights, and consumer advocate organizations thank you for the opportunity to submit a letter of support in response to the U.S. Department of Education's (the Department) Notice of Proposed Rulemaking (NPRM) regarding the proposed Federal TRIO eligibility rule (Docket ID ED-2024-OPE-0050).

We applaud the Department's commitment to fulfilling the statutory intent of the Federal TRIO program by expanding eligibility access to secondary education TRIO programs, Upward Bound, Talent Search, and Educational Opportunity Centers, to reach all students, regardless of citizenship status. The proposed changes are a monumental step towards ensuring that all students from disadvantaged backgrounds, including undocumented students, have access to the same college preparation and support services available to their peers.

We believe these changes have the potential to transform the lives of thousands of students, enabling them to access higher education, earn degrees, and contribute to our nation's prosperity. Through newly gained access to TRIO, upwards of 50,000 students will now benefit from academic tutoring, educational counseling, assistance in preparing for college admission and financial aid applications. Furthermore, this proposed rule removes the administrative burden incurred by TRIO providers of having to screen participants for citizenship status, and reduces the emotional toll many providers experience in rejecting these students at the door seeking the support offered to their peers.

We know that undocumented students place a high value on education and are eager to succeed. Over [400,000](#) undocumented students are already enrolled in higher education institutions across the country. [More than half](#) of states have taken steps to

provide access to in-state tuition or state financial aid programs, and scholarships for undocumented and/or DACA students. However, outdated federal regulations have needlessly excluded such students from receiving crucial supports intended to help those in need. Therefore, we strongly support the Department's proposed rule which would ensure TRIO providers can serve all students, thereby eliminating a significant barrier to student success and postsecondary degree attainment.

If you have any questions or comments, please contact Magin Sanchez, Higher Education Policy Analyst, UnidosUS, at msanchez@unidosus.org.

Sincerely,

Academia Avance
Acero Schools of Chicago
AFT, AFL-CIO
All4Ed
Alliance for a Better Community
AltaMed Health Services
Asian Americans Advancing Justice | AAJC
Breakthrough Central Texas
CABE • California Association For Bilingual Education
Cal State Student Association
Californians Together
Camino Nuevo Charter Academy
Campaign for College Opportunity
CATESOL
Centro Cultural
Centro Hispano Daniel Torres Inc.
Centro Hispano de East Tennessee
Centro Legal de la Raza
Cerritos College
Clearinghouse on Women's Issues
Clinica Monsenor Oscar A. Romero
Con Mi MADRE
Cypress Hills Local Development Corporation
East Bay Spanish Speaking Citizens' Foundation
EdTrust
Edu-Futuro
Esperanza
Esperanza, Inc.
Every Texan

Feminist Majority Foundation
Florida Policy Institute
Friends of Puerto Rico
Hispanic Association of Colleges and Universities
Hispanic Services Council, Inc.
Hispanic Unity of Florida
Immigrants Rising
ImmSchools
Inclusive Action for the City
Japanese American Citizens League (JACL)
La Paz Chattanooga
Latin American Association
Latino Community Center
Latino Leadership, Inc.
League of Women Voters of the United States
Many Languages One Voice (MLOV)
Mexican American Council
Mi Casa Resource Center
NAACP Florida State Conference
National Council of Asian Pacific Americans (NCAPA)
National Immigration Law Center (NILC)
National Newcomer Network
National Parents Union
New America Higher Education Program
Northern California College Promise Coalition
Parent Institute for Quality Education
Pastors for Florida Children
Presidents' Alliance on Higher Education and Immigration
Project on Predatory Student Lending
PUENTE Learning Center
Puentes New Orleans
SEAL
Social Justice Collaborative
Southern California College Attainment Network
Teach For America
The Century Foundation Higher Education Policy Team
The Century Foundation PreK-12 Education Team
The Institute for College Access & Success
The Leadership Conference on Civil and Human Rights
Together for Hope

uAspire

UnidosUS

United We Dream

Valley Initiative for Development and Advancement (VIDA)

Voces

Young Invincibles