

Public Comments Received for 2015-16 National Postsecondary Student Aid Study (NPSAS:16) Field Test Student Data Collection During the 60-day Comment Period and NCES Responses

Docket: ED-2014-ICCD-0143

Comment On: FR Doc # 2014-24583

Comment Related to Collection Schedule

Document: ED-2014-ICCD-0143

Name: Hershman, Richard

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I am writing to you in response to the October 17, 2014 Federal Register notice regarding Docket ID number ED-2014-ICCD-0143 requesting public comment on the 2015-16 National Postsecondary Student Aid Study (NPSAS:16) Field Test Student Data Collection. Headquartered in Oberlin, Ohio, the National Association of College Stores (NACS) is the professional trade association representing the collegiate and K-12 bookstore community. We represent more than 3,000 collegiate and elementary and secondary bookstores including school owned and operated bookstores, non-profit student owned cooperatives, small privately owned bookstores, and contract managed bookstore companies. NACS member stores serve nearly 95% of America's 17.5 million college students while supporting the academic missions of education institutions.

NACS' OnCampus Research is a national leader on research on the use of instructional materials in postsecondary education, including a long history of extensive student survey research contained in a twice a year survey called Student Watch. We have several concerns with the field test survey questions addressing student spending on instructional materials reflected in N16CBKSPUR and N16CCSTBKS. We urge the questions be revised prior to field testing the survey.

The first question N16CBKSPUR, "How did you obtain your required books, technology, and supplies during the 2014-2015 school year?" The first answer says "purchased or rented online" and then the second answer purchased or rented from school bookstore. The wording is problematic because students obtain instructional materials both online and in store at campus bookstores. Virtually every college bookstore today is a brick and click retailer.

The second question N16CCSTBKS is not consistent with the intent of the Higher Education Opportunity Act which requires the NPSAS to "(F) to describe how the costs of textbooks and other instructional materials affect the costs of postsecondary education for students." The provision was added to the survey in conjunction with the inclusion of a new Section 133 focused on textbooks and supplemental materials that accompany a textbook, not supplies, technology hardware, equipment, and software. Textbooks and their supplemental materials are defined in the statute in Section 133. The response options also are problematic as the question and answers inconsistently apply the terms used to describe the costs. As the U.S. Government Accountability Office found in their 2013 report to Congress: College Textbooks, Students Have Greater Access to Textbook Information "While the Bureau of Labor statistics publishes data annually on college textbook pricing, there are no comparable, nationally representative data sources that estimate student spending." The GAO's findings underscore the importance of the NPSAS survey questions focusing on instructional materials. Thank you for the opportunity to submit public comments on these important issues.

Richard Hershman
Vice President of Government Relations

NCES RESPONSE:

Dear Mr. Hershman,

Thank you for your comment submitted during the 60-day public review process, responding to a request for comments on the 2015-16 National Postsecondary Student Aid Study (NPSAS:16) Field Test Student Data Collection, which was published in the Federal Register by the National Center for Education Statistics (NCES) of the U.S. Department of Education. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

In response to your comments and following our initial meeting with you in October of 2014, we have revised our originally proposed survey questions. We have removed the first question (N16CBKSPUR) from the NPSAS:16 instrument, and we have revised the second question (N16CCSTBKS) as follows:

N16CCSTBKS

Cost of required textbooks and other required instructional materials

Next, we'd like to ask you some questions about money you spent on any instructional materials required by your school or instructor for classes. Do not include optional or recommended course materials in your answers.

During the 2014-2015 school year, about how much did you spend on:

(Indicate "0" if you did not spend any money on any of these items. Digital access codes purchased separately from textbooks should be included in the "Other required course materials" category.)

Required digital textbooks: \$____.00

Required textbooks—print versions only: \$____.00

Technology required to enroll in classes: \$____.00

Supplies: \$____.00

Other required course materials not already mentioned: \$____.00

We also revised the help text based on your feedback to our proposed changes. The revised *Appendix G-H NPSAS 2016 Field Test Student Collection Instruments.docx* document incorporates the new item wording and help text.

We agree that including this language is more consistent with other areas of the Higher Education Act, though it is not specifically mentioned in the part of the act requiring the Student Aid Survey.

Sincerely Yours,

Tracy Hunt-White, PhD
National Postsecondary Student Aid Study (NPSAS), Project Officer
Longitudinal Studies Branch
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