

Public Comments Received During the 60-day Comment Period

September 2017

2017–18 National Postsecondary Student Aid Study Administrative Collection (NPSAS:18-AC)

ED-2017-ICCD-0102

Comments on FR Doc # 2017-14678

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Comment in Support of NPSAS:18-AC

Document: ED-2017-ICCD-0102-0030

Name: Postsecondary Data Collaborative

Dear Ms. Mullan:

This letter is submitted on behalf of the 27 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), in response to the Department of Education's (ED) comment request notice regarding the 2017–18 National Postsecondary Student Aid Study Administrative Collection (NPSAS:18-AC). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity, and the organizations below represent diverse constituents including students, institutions, and states.

We are writing to express our support for the National Center for Education Statistics' (NCES') proposed revision to add NPSAS:18-AC to the existing NPSAS study cycle. The nationally representative sample of undergraduate and graduate students across all 50 states will support state and federal policymaker and researcher efforts in answering critical questions related to college affordability and students' financing of postsecondary education. Making NPSAS data available on a biannual basis will enhance the field's ability to conduct timely analyses. Further, we applaud NCES efforts to release a NPSAS data-set with a larger sample size capable of supporting both national and state-level analyses, providing state representative samples for all 50 states, the District of Columbia, and Puerto Rico for the first time. The ability to explore state-level estimates of college costs and student aid will be a true value-add, enhancing states' ability to craft and implement data-driven policies.

Postsecondary data that empower policymakers to make evidence-backed decisions and researchers to produce timely analyses are vital to addressing issues of college affordability and improving student outcomes. We value the Department's dedication to strengthening the postsecondary data infrastructure, and are grateful for its recognition of the need for high-quality data.

Thank you for the opportunity to comment on the proposed revision. If you have any questions, please do not hesitate to call or email Mamie Voight, vice president of policy research at the Institute for Higher Education Policy (IHEP) at (202) 587-4967 or mvoight@ihep.org.

Sincerely,

Achieving the Dream
Advance CTE
American Association of Community Colleges
American Association of State Colleges and Universities
Association of Public & Land-grant Universities
California EDGE Coalition
Campaign for College Opportunity
Center for Law and Social Policy
Complete College America
Georgetown University Center on Education and the Workforce
Higher Learning Advocates
Institute for Higher Education Policy
Jobs for the Future
Knowledge Alliance
Lehman College of The City University of New York
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Center for Higher Education Management Systems
National College Access Network
New America Education Policy Program
Postsecondary Analytics
Public Insight Corporation
The Bell Policy Center
The Institute for College Access & Success
Veterans Education Success
Western Interstate Commission for Higher Education
Young Invincibles

NCES Response to Comment in Support of NPSAS:18-AC

Dear Members of the Postsecondary Data Collaborative,

Thank you for your feedback posted on September 11, 2017 responding to a 60-day request for comments on the proposed 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The National Center for Education Statistics appreciates the support the Collaborative provides for the success of this study.

Sincerely,
Sean Simone
National Postsecondary Student Aid Study
Longitudinal Surveys Branch

Comment in Support of NPSAS:18-AC and on Including Verification Measures

Document: ED-2017-ICCD-0102-0037

Name: Diane Cheng, Associate Research Director, The Institute for College Access & Success (TICAS)

Re: Docket ID ED-2017-ICCD-0102

Dear Ms. Mullan:

These comments are in response to the July 13, 2017 Federal Register notice regarding the U.S. Department of Education's 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The Institute for College Access & Success (TICAS) works to make higher education more available and affordable for people of all backgrounds. Through nonpartisan research, analysis, and advocacy, we aim to improve the processes and public policies that can pave the way to successful educational outcomes for students and for society. We greatly appreciated the opportunity to participate in the January 2017 Technical Review Panel (TRP) on the NPSAS:18-AC collection.

We strongly support the NPSAS:18-AC information collection and echo the points made in the comments submitted by the Postsecondary Data Collaborative (PostsecData). NPSAS has historically provided crucial, nationally-representative data that help policymakers, researchers, and other stakeholders answer critical questions related to college affordability, student debt, and the other ways students finance higher education. Shortening the gap between NPSAS studies from four years to two years will greatly improve the usefulness of the data in reflecting policy changes and other fluctuations in the postsecondary landscape.

Moreover, it will be very valuable to have state representative samples for all 50 states, the District of Columbia, and Puerto Rico for the first time. The last time NPSAS featured state representative samples was in NPSAS:08 and the data were representative for only six states. We routinely use the 2007-08 state oversample for California to inform state policy discussions, but the data are now quite outdated. Having state representative samples in NPSAS:18-AC would allow for updates to those types of state level analyses that can help inform policy decisions across the country.

We recommend one addition to this data collection – the inclusion of verification data from the Department of Education's Central Processing System (CPS). Every year, millions of students who apply for federal financial aid are required to submit additional documentation after they submit the FAFSA and before they can receive their aid. Our work with the National Association of Student Financial Aid Administrators (NASFAA) and the National College Access Network (NCAN) identified verification as a complex process that creates enormous burdens for students as well as financial aid and college access professionals, and can create delays and barriers to both aid and enrollment for low-income students.

Adding verification data to NPSAS would help quantify which types of students are most burdened by verification, as well as the degree to which verification affects students' likelihood of receiving aid, which can influence whether they enroll in and complete college.

Thank you for the opportunity to comment on the proposed NPSAS:18-AC information collection. If you have any questions, please feel free to contact me at dcheng@ticas.org or 510-318-7900.

Sincerely,

Diane Cheng

Associate Research Director

NCES Response to Comment in Support of NPSAS:18-AC and on Including Verification Measures

Dear Ms. Cheng,

Thank you for your feedback posted on September 11, 2017 in response to a 60-day request for comments on the proposed 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The National Center for Education Statistics appreciates your support of the NPSAS:18-AC data collection.

We recognize the utility of including verification data from the Department of Education's Central Processing System (CPS) and how they could be useful to researchers and policymakers. In conjunction with our colleagues in the Office of Federal Student Aid, NCES will explore whether it is feasible to include verification measures from the National Student Loan Data System (NSLDS) or CPS in NPSAS:18-AC. Inclusion of the requested data will depend on data quality and disclosure avoidance review.

Sincerely,

Sean Simone

National Postsecondary Student Aid Study
Longitudinal Surveys Branch
National Center for Education Statistics
U.S. Department of Education
Office: 202-245-7631

Comment on the Survey Design to Answer Questions about Graduate Student Population

Document: ED-2017-ICCD-0102-0008

Name: Christopher P. Chapman, President and Chief Executive Officer, AccessLex Institute

Dear Acting Director Mullan:

I am writing on behalf of AccessLex Institute in response to the July 13, 2017 Federal Register notice soliciting comments on the upcoming 2017–18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18–AC) being conducted by the National Center for Education Statistics (NCES). Thank you for the opportunity to comment on this data collection.

AccessLex Institute, in partnership with its nearly 200 nonprofit and state-affiliated ABA-approved member law schools, has been committed to improving access to legal education and to maximizing the affordability and value of a law degree since 1983. The AccessLex Center for Legal Education Excellence advocates for policies that make legal education work better for students and society alike, and conducts research on the most critical issues facing legal education today.

Purposes and Uses of the Data

Supporting Statement Part A included in the docket folder of the Federal Register notice explains that the NPSAS collects data on a sample of both undergraduate and graduate students and that it provides the data for comprehensive descriptions of these student populations. These quadrennial NPSAS data sets have informed the research and policy work of AccessLex Institute related to access, affordability and value issues in graduate and professional education, and are an invaluable resource to the higher education community.

However, Supporting Statement Part A also indicates that the primary research and policy issues to be

addressed using NPSAS:18-AC data will be focused on undergraduate students. While the issues presented are important ones for federal and state policymakers, institutions and students to understand in regard to the undergraduate population, many of these issues impact graduate and professional students as well, and should be examined using NPSAS:18-AC data. For example, the research questions below, included in Supporting Statement Part A, should also be applied to graduate and professional students. In order for that to be feasible, a sufficiently large sample of data on graduate and professional students must be collected.

What proportion of undergraduates are first-generation college students, and what types of institutions are they attending?

Prior NPSAS collections have provided data on parental education levels for graduate and professional students, and this practice should be maintained for NPSAS-AC collections. As will be done for undergraduate students, data collected in NPSAS:18-AC should also seek to answer the question “What proportion of graduate and professional students are first-generation, and what types of institutions are they attending?”

What types of students are enrolled in vocational certificate, associate’s degree, and bachelor’s degree programs, and what are their fields of study?

In addition to the sub-baccalaureate and baccalaureate credentials presented here, the NPSAS:18-AC data collection should yield the necessary data to answer the question “What types of students are enrolled in post-baccalaureate or post-master’s certificate, master’s degree, doctoral degree and professional degree programs, and what are their fields of study?”

What proportion of students are receiving aid from states, institutions, employers, and private sources, and what is the average amount received?

Data collected in NPSAS:18-AC should be able to answer this question when applied to graduate and professional students.

Additionally, none of the questions presented in Supporting Statement Part A related to student borrowing address graduate and professional student debt, particularly through the Grad PLUS Loan program, which many advanced degree students rely on to fund their education. While information about the Direct Loan programs may cover graduate and professional student borrowing, it may not provide a complete picture of student loan borrowing for this population without intentional sampling based on advanced degree student considerations. The NPSAS:18-AC data collection should gather relevant information and sufficient sample sizes to answer questions about:

- The percentage of graduate and professional students borrowing and the average amounts borrowed through the federal student loan programs by institution type, degree program (with sufficient samples at the GRADGPG variable level to provide more granularity), and income;
- The percentage of students borrowing federal loans by type (i.e., Unsubsidized Stafford and Grad PLUS Loans) and the amounts borrowed in each program;
- The cumulative debt load of graduate and professional students by degree program (again, with sufficient samples to analyze at the GRADGPG variable level); and,
- The percentage of graduate and professional students that borrow private loans, in what amount, by degree program and by institution type.

The NPSAS:18-AC collection should also aim to provide, where possible, sample sizes that allow graduate and professional education stakeholders to examine these questions for specific subpopulations of students, based on their sex, race/ethnicity, degree program, and institution type, both in isolation and in combination.

Given that the Department of Education intends for the data collected by NPSAS:18-AC to be used to “address policy issues related to changes in federal financial aid programs resulting from the anticipated reauthorization of the Higher Education Act”, and these changes could significantly impact students’ access to graduate and professional education, the data must provide policymakers and researchers with the ability to determine the extent of those impacts.

Thank you for your time and attention to this matter. If you have questions or would like any additional information, please contact me or Nancy Conneely, Director of Policy, at nconneely@accesslex.org.

Sincerely,

Christopher P. Chapman

President and Chief Executive Officer

NCES Response to Comment on the Survey Design to Answer Questions about Graduate Student Population

Dear Mr. Chapman,

Thank you for your feedback posted on September 5, 2017 responding to a 60-day request for comments on the proposed 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The National Center for Education Statistics appreciates your interest in the NPSAS:18-AC data collection.

The NPSAS:18-AC sampling plan, as outlined in Part B of the OMB package, indicates that NCES will stratify the sample to include certain graduate student groups to ensure coverage of the graduate student population. They include:

1. master's degree students in science, technology, engineering, and mathematics (STEM) programs;
2. master's degree students in education and business programs;
3. master's degree students in other programs;
4. doctoral-research/scholarship/other students in STEM programs;
5. doctoral-research/scholarship/other students in education and business programs;
6. doctoral-research/scholarship/other students in other programs;
7. doctoral-professional practice students; and
8. other graduate students.

In addition, NPSAS:18-AC has been designed to provide a larger sample size of graduate students (25,000) than NPSAS:16. NCES anticipates that analysts will be able to conduct analyses to address many of the research questions you propose, with some limitations. Specifically, sample sizes will become small when producing estimates at the program level (except for those in the domains above) and within states since we are only seeking state representative samples for undergraduate students. NCES has considered expanding the graduate sample further, but we have concerns about perceived burden on institutions. We decided not to increase the sample further until we can conduct a study on institution burden. We also appreciate your interest in graduate student federal loan debt and can assure you that that information will be provided in the NPSAS:18-AC dataset. As these data mostly are drawn from the National Student Loan Data System (NSLDS), they do not place additional burden on institutions.

Sincerely,

Sean Simone

National Postsecondary Student Aid Study

Longitudinal Surveys Branch

National Center for Education Statistics

U.S. Department of Education

Office: 202-245-7631

Comment on Capturing Non-Federal Sources of Aid for Graduate Students

Document: ED-2017-ICCD-0102-0015

Name: Suzanne Ortega, President, Council on Graduate Schools

Dear Ms. Mullan,

On behalf of the Council of Graduate Schools (CGS), I appreciate this opportunity to provide comments and feedback to the 2017-18 National Postsecondary Student Aid Study Administrative Collection (NPSAS:18-AC, Agency Docket Number ED-2017-ICCD-0102). CGS membership includes roughly 500 universities in the United States that annually award the majority of U.S. doctoral and masters degrees each year.

NPSAS is an important data tool for the higher education community that offers insights into student financial support at U.S. postsecondary institutions. CGS applauds the Agency's effort to expand the NPSAS series by including the administrative data collection. This proposed expansion will increase the frequency of NPSAS data releases and will allow for more timely and frequent analyses of student financial support patterns. CGS is particularly pleased that the Agency's proposed sampling strategy creates several sampling strata for different segments of graduate and professional students. This will allow researchers and analysts to perform nuanced examinations of student financial support that account for differences by degree objectives between masters, doctoral, and professional students, and some disciplinary differences.

Funds disbursed through the FAFSA process may be the only or one of many sources from which Masters and doctoral students draw their financial support. The proposed administrative collection has the potential to offer more frequent snapshots of student borrowing toward graduate and professional education. However, it is not clear from the supporting documents how other forms of financial support, such as employer paid tuition assistance, graduate fellowships, research assistantships, and traineeships, will be captured in this proposed data collection effort. The Agency's Data File Documentation for NPSAS:12 notes a 52% match of survey graduate students to the 2011-12 CPS, which is most likely attributable to the fact that the FAFSA is not required for graduate and professional students, unless they are applying for federal loans.

CGS believes that the proposed administrative collection will add value to the NPSAS series by beginning to differentiate graduate and professional student financial support data. As the only national organization that represents masters and doctoral education in the United States, CGS is prepared to be a resource for the Agency when data tools that better inform the graduate education community are considered. Specifically, we would welcome the opportunity to be a part of future NPSAS technical review panels (TRPs), as CGS has been represented in TRPs for other NCES data collection efforts, including the Baccalaureate & Beyond Longitudinal Study, in the past. Thank you for your consideration of these comments.

Sincerely,

Suzanne T. Ortega
President

NCES Response to Comment on Capturing Non-Federal Sources of Aid for Graduate Students

Dear Dr. Ortega,

Thank you for your feedback posted on September 8, 2017 responding to a 60-day request for comments on the proposed 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The National Center for Education Statistics appreciates your support for the NPSAS:18-AC data collection.

One of the recognized limitations of NPSAS:18-AC is that it does not include a student questionnaire to capture information on the non-federal sources of aid that are not available in administrative data. However,

the NPSAS data collections that have been taking place every 4 years (the latest being NPSAS:16, and the next being NPSAS:20) will continue to include a student questionnaire that asks about non-federal sources of aid.

For NPSAS:18-AC, all possible administrative sources will be explored to help provide the best possible data for this study. Specifically, the institutional records to be collected as part of NPSAS:18-AC will contain data concerning the employer paid tuition assistance, graduate fellowships, research assistantships, and traineeships you note, as well as other forms of state and institutional aid received by graduate students.

NCES welcomes support from CGS to help identify data sources and tools that can help to better inform the graduate education community. The NPSAS:18-AC TRP meeting was held in January 2017 and focused on state-level undergraduate student estimation. A future TRP meeting in preparation for NPSAS:20 will include discussions pertaining to national-level graduate student estimations.

Sincerely,
Sean Simone
National Postsecondary Student Aid Study
Longitudinal Surveys Branch
National Center for Education Statistics
U.S. Department of Education
Office: 202-245-7631

Comments on Food and Housing Insecurity

(listed in the order each was submitted)

Document: ED-2017-ICCD-0102-0009

Name: Rebecca Villarreal

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my/our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0010

Name: Talia Berday-Sacks

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of

Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies.

Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0011

Name: Talia Berday-Sacks, Challah for Hunger

Challah for Hunger is writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion.

Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Challah for Hunger builds communities inspired and equipped to take action against hunger. Our campus program is a chapter-based leadership development program in 30 states at 36 public and 38 private colleges and universities. In the attached report [<https://challahforhunger.org/2017/08/31/campus-hunger-project-year-one-report>], we summarize and reflect on findings from a national educational campaign and research project to address college food insecurity.

Document: ED-2017-ICCD-0102-0012

Name: Rashida Crutchfield, Assistant Professor, School of Social Work, California State University, Long Beach

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing security so that results can be compared to other studies. It is my position that adding questions about food

and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

I am an assistant professor of social work at California State University, Long Beach and the principal investigator for the California State University system study on housing and food security for our students. Prior to this, I conducted a study of California community college students who were experiencing homelessness. Repeatedly, students have spoken to me about their struggles in college. Many students spoke specifically about how challenging navigating the financial aid process is and how barriers to financial aid could and did become obstacles to graduation. As a part of the study, financial aid administrators have discussed challenges to not having streamlined support to facilitate the financial aid process to students. University and college staff want to help students, but they need data to support efforts to ensure this consistent support. I unequivocally support the addition of these questions in order to develop the best national research possible.

Food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the California State University Chancellors Office measurement guide *Researching basic needs: Qualitative and quantitative instruments to explore a holistic understanding of food and housing insecurity* available at <https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Documents/researching-basic-needs.pdf>.

California has the highest rate of homeless youth in the nation and twice the rate of homeless students as the national average (4% in CA vs. 2% nationally). Access to education is the only way out of homelessness for most of these young people. In todays society, it is increasingly difficult to support oneself without higher education. A college education leads to lower unemployment, higher wages, and greater contribution to the tax base of the state. Yet, homelessness erects barriers to college enrollment and success. Our students need your support and the clarity that these questions can provide.

Sincerely,

Rashida Crutchfield, MSW, EdD
Assistant Professor
School of Social Work
California State University, Long Beach

Document: ED-2017-ICCD-0102-0013

Name: Aydin Nazmi, California Polytechnic State University

I writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material

challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0014

Name: Josh Protas, MAZON: A Jewish Response to Hunger

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion.

Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0016

Name: Rachel Sumekh, Swipe Out Hunger

With current research showing that more than half of community college students are food insecure, I'm writing to urge that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. From my seven years experience on the ground, adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0017

Name: Sara Goldrick-Rab, Founding Director of the Wisconsin HOPE Lab, Professor of Higher Education Policy and Sociology, Temple University; Katharine Broton, Affiliate, Wisconsin HOPE Lab, Assistant Professor of Education, University of Iowa; & Clare Cady, Affiliate, Wisconsin HOPE Lab, Founder, College and University Food Bank Alliance

Dear Acting Director Mullan:

We are writing in response to the Federal Register notice soliciting comments on the upcoming 2017–18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18–AC) being conducted by the National Center for Education Statistics. The Wisconsin HOPE Lab strongly urges you to add standardized measures of food and housing insecurity to the next administration of the NPSAS.

The Wisconsin HOPE Lab is the nation’s only translational research laboratory aimed at making college more affordable. We study the costs of attending college; explore approaches to help students and families contend with those costs; and experiment with approaches to lowering costs while ensuring that students earn degrees of value.

Over the past decade, we have been studying basic needs insecurity among college students and our research indicates that a significant share of undergraduates is food and/or housing insecure. Our most recent study, [Hungry and Homeless in College](#), found that more than half of community college students struggle to obtain adequate food and/or housing. In light of this evidence, scholars, practitioners and policymakers need additional data to confirm these findings and create a clear national picture of the prevalence of food and housing insecurity among today’s undergraduates.

The National Postsecondary Student Aid Study includes information from a nationally representative sample of postsecondary students, making it ideal to track the prevalence and correlates of basic needs insecurity among college students. The goal of the NPSAS is to learn about how students and their families finance education beyond high school. It is our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students’ basic needs.¹ It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting student success and college completion.

We strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. To aid in these efforts, we have created a [Guide to Assessing Basic Needs Insecurity in Higher Education](#) with detailed measurement recommendations. Specifically, the U.S. Department of Agriculture has validated an 18-item, 10-item, and 6-item version of the food security survey module. Any of the three scales could be used, but should be used in full. For details on selecting a food security survey module, see <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/survey-tools/>. These USDA survey modules are used on several national surveys including the CPS, SIPP and in Feeding America’s National Report. Similarly, we recommend that the NPSAS include standardized measures of housing insecurity and homelessness, such as those found on the SIPP, conducted by the U.S. Census Bureau and described in detail in the Wisconsin HOPE Lab’s *Guide to Assessing Basic Needs Insecurity in Higher Education* available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Thank you for considering our recommendation. Please contact me at SGR@Temple.edu if you have any

¹ Despite claims in a recent Urban Institute [report](#) that the Current Population Survey (CPS) provides nationally representative information on students’ food security, the CPS is a nationally representative study of households, not students, and today’s students do not fit well into households as explained in detail [here](#).

questions or would like additional information.

Sincerely,

Sara Goldrick-Rab.

Founding Director of the Wisconsin HOPE Lab

Professor of Higher Education Policy and Sociology, Temple University

Katharine Broton

Affiliate, Wisconsin HOPE Lab

Assistant Professor of Education, University of Iowa

Clare Cady

Affiliate, Wisconsin HOPE Lab

Founder, College and University Food Bank Alliance

Document: ED-2017-ICCD-0102-0018

Name: Jennifer Maguire, Assistant Professor of Social Work, Humboldt State University

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research from the California State University (23 four year campuses) estimates 1 in 5 students experience food insecurity and that 1 in 10 are facing homelessness. Recent research from the Wisconsin HOPE LAB found more than half of all community college students are experiencing food and/or housing insecurity. These statistics are alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies.

Specific recommendations on the measurement of basic needs insecurity among four-year university students is available in the California State University Chancellors Office measurement guide Researching basic needs: Qualitative and quantitative instruments to explore a holistic understanding of food and housing insecurity available at <https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Documents/researching-basic-needs.pdf>. To learn more about CSU Basic Needs Research, Resources and Initiatives, please visit, www.calstate.edu/basicneeds

Specific recommendations on the measurement of basic needs insecurity among community college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Jen Maguire, PhD, MSW

Assistant Professor of Social Work

Humboldt State University

Document: ED-2017-ICCD-0102-0019

Name: Michael Rosen, AFT Local 212 FAST (Faculty and Students Together) Fund

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position as the Director of the AFT Local 212 FAST Fund, an emergency fund for Milwaukee Area Technical College students, that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college retention and completion.

Current research has found that more than half of all two-year college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0020

Name: Pablo Muirhead, Milwaukee Area Technical College

I keep a box of granola bars in my office for the many students that I see on a weekly basis that struggle to focus due to insufficient caloric intake. Standardized measures of food and housing insecurity need to be included by the NPSAS so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0021

Name: Toshiba Adams, Milwaukee Area Technical College

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my/our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to

alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0022

Name: Ronald Hallett, Benerd School of Education

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

Document: ED-2017-ICCD-0102-0023

Name: Marissa Schnitman

I strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students' basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity - a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Lab's Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0024

Name: Kenneth O'Reilly, U of Alaska Anchorage (emeritus) & Milwaukee Area Technical College

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. This will provide policymakers with information required to assess if Federal Student Aid in meeting students basic needs. In my view, affordable college is a basic human right. At one time in our history, universal public education was inconceivable. But a universal public education system on the K-12 level has long been the norm. We need to at least take a step in the right direction by doing all we can to insure that today's college students can meet their basic needs starting with food and housing.

And this process must begin with data gathering. This is why I support a food and housing insecurity survey basic on scientific data gathering measures like those used by the Wisconsin HOPE Lab. See this link, please. <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0025

Name: Kathryn Cunningham, Milwaukee Area Technical College

As a college Counselor who regularly sees students with food and housing insecurity, I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0026

Name: Brian Bridges, UNCF

I write to recommend that the next NPSAS include standardized measures of food and housing insecurity so results can be compared to other comparable studies. I believe that adding questions about food and housing insecurity will provide policymakers with information to assess the efficacy of Federal Student Aid in meeting students basic needs. It should also highlight the need for new programs to alleviate hunger and homelessness among undergrads and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Existing research reported that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0027

Name: Matthew Morton, Chapin Hall at the University of Chicago

Homelessness, housing instability, and food insecurity are significant yet hidden problems, and we know that this is true in education systems. This must be addressed for all students to realize their full potential for both themselves and for contributing to our nation's competitiveness. But what isn't measured can't be adequately or strategically addressed.

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my/our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0028

Name: Steven Shea

I believe that NPSAS should include standardized measures of food and housing insecurity so that results can be compared to other studies. As an educator, I frequently see students that are food and housing insecure. Students can not be expected to thrive and succeed without adequate food and housing. We can start by gathering data. The Wisconsin HOPE Lab is a model in this task.

Document: ED-2017-ICCD-0102-0029

Name: Representative Al Lawson, 5th District, Congress of the United States, House of Representatives (Committee on Agriculture, Committee on Small Business, Ranking Member, Subcommittee on Health and Technology)

Dear Acting Director Mullan,

I am writing in response to the Federal Register notice soliciting comments on the 2017-18 National Postsecondary Student Aid Collection (NPSAS: 18-AC), conducted by the National Center for Education Studies. I encourage the Department of Education to add questions that will assess the degree and extent of food insecurity on college campuses.

In the 2017-2018 academic year, the National Center for Education Statistics estimates that just over 20 million students will attend American colleges and universities. These are students who, like some of their parents before them, head to college with the brightest of aspirations and the loftiest of intentions. Unfortunately, advocates and researchers have begun documenting the fact that hunger and food insecurity does not only affect our youngest of students, but also the hearts and minds on college campuses.

In one of the most comprehensive studies to date, the Urban Institute found that up to 21 percent of students in two year colleges were found to be food insecure, and at least 1 in 10 struggled with hunger in four-year colleges and vocational schools. Organizations such as the College and University Food Bank Alliance have responded to this phenomenon by supporting hundreds of food banks on college campuses, with the hopes that these students can continue to concentrate on their education. These statistics are unsettling, and the issue of food insecurity among college students remains an increasingly large public health concern. The inability to gain constant access to nutritional food has been found to lead to poor academic performance, poorer physical health problems, and increasing cases of mental health concerns - such anxiety and depression.

The National Postsecondary Student Aid Study (NPSAS), is the primary source of data used by the federal government to evaluate student financial aid, demographic, and enrollment information. This information is used to inform public policy ranging from Pell Grants to Stafford loans and is an optimal means to assess the prevalence of food insecurity on college campuses.

I strongly believe that adding questions about food insecurity would provide policymakers and Members of Congress the data required to assess the adequacy of financial aid, and potentially, the insight to present a more accurate portrayal of the barriers that inhibit student success and collegial attainment-specifically hunger.

Thank you for your consideration of this recommendation, and I look forward to working to improve NPSAS.

Sincerely,

Al Lawson

Document: ED-2017-ICCD-0102-0031

Name: Tom Allison, Deputy Director of Policy & Research, Young Invincibles

Dear Acting Director Mullan:

I am writing representing Young Invincibles, a national research and advocacy organization whose mission is to amplify the voices of young adults in the political process and expand economic opportunity for our generation. We support for the National Center for Education Statistics' (NCES') proposed revision to add NPSAS:18-AC to the existing NPSAS study cycle. In addition to these comments, we join the Postsecondary Data Collaborative's support of NPSAS: 18-AC.

The student unit record ban presents significant challenges to fully understanding how individual institutions serve different types of students. By providing estimates that can be disaggregated by important factors such as race, ethnicity, and socioeconomic status, NPSAS and other surveys play an important role in higher education policymaking. Young Invincibles relies on NCES surveys, including NPSAS, to better understand today's college students' unique challenges in accessing, affording, and completing college (see A Blueprint for Higher Education Equity, Finding Time – Millennial Parents, Poverty and Rising Costs) and advocate for policies accordingly. Providing this data more frequently will help policymakers, institutions, students, and families make more informed decisions. Furthermore, by increasing sample size to include state-level analyses, state policymakers and advocates can make more informed decisions on where to align resources and policies to help students most in need.

Regarding issue (4) in the comment request, "how might the Department enhance the quality, utility, and clarity of the information to be collected", we also suggest NCES explore ways to capture specific challenges faced by today's students. Specifically, we support efforts to measure food and housing insecurity amongst today's students. Also, more and more of today's students are parents, so understanding student-parents' experiences with child care on and off campus would help us better identify the states and sectors in the most need for these services.

Thank you for the opportunity to comment

Tom Allison

Deputy Director of Policy & Research

Young Invincibles

Document: ED-2017-ICCD-0102-0032

Name: Kaitlyn Vitez, Student Public Interest Research Groups & James Dubick, National Student Campaign Against Hunger and Homelessness

Dear Ms. Mullan,

As part of your comment request on the content of the 2017-18 National Postsecondary Student Aid Student Aid survey (NPSAS: 18-AC), we are writing to strongly recommend that the survey include standardized measures of food and housing insecurity.

Last Spring, our two organizations surveyed college students to discern their needs and attitudes when it comes to accessing social service programs on campus that may help them avoid such insecurity. The report is called Hunger on Campus and is available at <http://www.studentpirgs.org/reports/sp/hunger-campus>.

Adding questions about food and housing insecurity would provide policymakers with the information required to determine the true prevalence of student food and housing insecurity and assess the efficacy of Federal Student Aid in meeting students' basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for students, and enable researchers to produce a more accurate picture of the challenges inhibiting college completion.

Current research has found that more than half of all community college students experience food and/or housing insecurity - a statistic that is alarming when compared to the general U.S. population. Collecting additional data on this issue is critical in order to better understand it and address the needs of college students on federal, state, and institutional levels.

The NPSAS food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies.

Specific recommendations on the measurement of basic needs insecurity among college students are available in the Wisconsin HOPE Lab's Guide to Assessing Basic Needs Insecurity in Higher Education, available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

For further questions or information, please follow up with either of us: James Dubick, National Student Campaign Against Hunger and Homelessness; james@studentsagainsthunger.org; 213-840-2880. Kaitlyn Vitez, Student Public Interest Research Groups; kvitez@pirg.org; 202-546-9707 x 321.

Sincerely,

Kaitlyn Vitez

Student Public Interest Research Groups

James Dubick

National Student Campaign Against Hunger and Homelessness

Document: ED-2017-ICCD-0102-0033

Name: Collin Witherspoon, Amarillo College

We are writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0034

Name: Jennifer Berday & Elisha Sacks

Any evaluation of a student's overall assets and resources MUST take into account access to food, and food needs, and place these facts into the larger picture of needs and resources. Data and common sense tell us that those with insufficient nutrition and overall insufficient calories have trouble concentrating and cannot perform to fill potential. Please listen to the experts and assess food related needs and concerns in your data gathering process. Sincerely, Jennifer Berday and Elisha Sacks

Document: ED-2017-ICCD-0102-0035 and ED-2017-ICCD-0102-0036

Name: Raquel Moya

To whom it may concern,

We are concerned university students at the University of Virginia. We urge you to add questions to this survey about hunger and homelessness among colleges students in order to assist with critical research and highlight the need for new programs that support students in their pursuit for a college education. We want to make it a priority for the the Department of Education to collect better data.

Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education (<http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>).

Document: ED-2017-ICCD-0102-0038

Name: Arthur Heitzer, President of the Milwaukee Turners, Inc.,

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. Adding these questions to the NPSAS would also help to highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion.

We are a civic organization operating a school of gymnastics and other programs for physical and mental fitness, and have done so for over 100 years. We have also trained many physical education teachers and were largely responsible for such education being part of public schools. The extremely unequal distribution of wealth in our area today, resulting in hunger and homelessness, would appear to have a great impact on the ability to succeed in post-high school education, and it would be a mistake not to include this in the NPSAS.

Thank you for your consideration,

Arthur Heitzer,

President of the Milwaukee Turners, Inc.,

Milwaukee's oldest civic organization and operator of historic Turner Hall, founded by German immigrants and refugees in 1853.

Document: ED-2017-ICCD-0102-0039

Name: Amy Goldwater

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my/our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion. Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: ED-2017-ICCD-0102-0040

Name: Sarah Hamersma

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. I have been working in the food insecurity field and there are very few datasets that do a good job measuring these very important factors, particularly at a pivotal point in the life course. Food assistance in the U.S. is strongest at birth and during early childhood (WIC, SNAP), remains steady through age 18 (School lunch, SNAP) and then essentially disappears for young adults without children who seek higher education, since their decision to make educational

investments may prevent them from meeting SNAP work requirements. Understanding the role that SNAP plays in the lives of young adults, and particularly its role in their educational investments, will be crucial to solid food policy (and financial aid policy) moving forward.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies.

Document: ED-2017-ICCD-0102-0041

Name: Len Zimmerman, Challah For Hunger

I am writing to strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. It is my position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students basic needs. It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting college completion.

Current research has found that more than half of all community college students are experiencing food and/or housing insecurity a statistic that is alarming when compared to the general US population. Collecting additional data on this issue is critical to better understanding it and addressing the needs of college students on federal, state, and institutional levels.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable to other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Labs Guide to Assessing Basic Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Document: N/A

Name: Archie Cubarrubia, Vice Provost, Miami Dade College

Dear Dr. Hunt-White:

We are writing to recommend inclusion of standardized measures of food and housing insecurity in either NPSAS:18-AC, NPSAS:20, or both so we can better understand how these issues affect student success. Adding questions about food and housing insecurity to NPSAS would provide colleges and universities a more complete picture of these issues at the state and national levels so we can determine how best to alleviate hunger and homelessness among our students. In addition, these data can provide policymakers with information they need to assess the efficacy of state and federal financial aid programs in meeting students' basic needs.

Current research has found that more than half of all community college students are experiencing food and/or housing insecurity—a statistic that is alarming when compared with the general U.S. population. Collecting additional data on this issue is critical so we can better address the needs of our students and ensure their success.

The proposed food and housing insecurity survey measures should be aligned with current methods of data collection, such as those validated by the U.S. Department of Agriculture and Census Bureau, to ensure that they are comparable with other national studies. Specific recommendations on the measurement of basic needs insecurity among college students is available in the Wisconsin HOPE Lab's *Guide to Assessing Basic*

Needs Insecurity in Higher Education available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Thank you for your consideration.

Sincerely,

Archie P. Cubarrubia

Vice Provost

NCES Response to Comments on Food and Housing Insecurity

Dear Commenters,

Thank you for your feedback posted during the 60-day public comment period regarding the proposed 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The National Center for Education Statistics appreciates your support of the NPSAS:18-AC data collection.

Thank you for drawing attention to the important issues of food and housing insecurity. We agree that data on food and housing insecurity and how they relate to student financial aid are appropriate topics for consideration in NPSAS. The one limitation of NPSAS:18-AC is that it does not include a student questionnaire to collect data on topics such as food and housing insecurity.

However, NCES is planning to test food and housing insecurity items in the student questionnaire in the NPSAS:20 field test. Currently, planning for NPSAS:20 is in its early stages and, in preparation for the NPSAS:20 field test, NCES will hold a Technical Review Panel (TRP) meeting in 2018 to discuss the items considered for the NPSAS:20 student questionnaire. After the TRP meeting, the public will also have an opportunity to comment on all proposed NPSAS:20 student questionnaire items, including those pertaining to food and housing insecurity, first during a 60-day and then during a 30-day public comment periods associated with OMB clearance of the NPSAS:20 field test.

Additionally, regarding the NPSAS administrative data collections, while NCES is aware of a number of Federal administrative data sources that may have data related to food and housing insecurity, the source agencies are often restricted in sharing the relevant data with other federal entities, such as NCES. That said, NCES will continue to investigate possible sources of administrative data to augment the information collected through NPSAS administrative data collections.

We thank you again for bring this important topic to our attention.

Sincerely,

Sean Simone

National Postsecondary Student Aid Study

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