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2019–20 National Postsecondary Student Aid Study (NPSAS:20)

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Comment on Support of NPSAS:20 and Inclusion of New Measures

Name: Kim Dancy

Organization: Postsecondary Data Collaborative

June 11, 2019

James Woodworth
Commissioner
National Center on Education Statistics (NCES)
U.S. Department of Education
550 12th Street SW
Washington, DC 20024

Dear Commissioner Woodworth:

This letter is submitted on behalf of the 24 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is comprised of organizations committed to the use of high quality postsecondary data to improve student success and advance educational equity. PostsecData recognizes the vital role that the National Postsecondary Student Aid Study (NPSAS) plays in allowing researchers, policymakers, student advocates, and other higher education stakeholders to understand college affordability and student financial aid.

The importance of NPSAS as a tool for researchers and policymakers cannot be understated. NPSAS remains the only cross-sectional federal survey that represents all college students and allows for detailed disaggregation by race/ethnicity, income, and other indicators. NPSAS is also the base survey for both longitudinal postsecondary surveys—Beginning Postsecondary Students (BPS) and Baccalaureate and Beyond (B&B)—which are commonly used to understand how student experiences and characteristics relate to their completion, persistence, and post-college outcomes.

While NCES has requested feedback on the technical elements of the NPSAS survey, we strongly encourage you to consider expanding information collection to address several pressing topics in college affordability and financial aid. We recognize that developing a complex and reliable survey instrument is a time-consuming and resource intensive process, and as such, we hope to give NCES sufficient time to consider and implement the recommendations below. Additionally, we recognize that NCES will not be able to incorporate all of the data elements included here. In determining what changes can be accommodated, we encourage you to evaluate both the usefulness to the field based on the prioritization provided, as well as how feasible it is to measure each data element accurately. We also encourage NCES to continue to develop and implement innovative data collection methods, such as the NPSAS 2017-18 Administrative Collection, which allows for a better understanding of students' postsecondary experiences at the state-level while minimizing burden on institutions and students. The undersigned members are available to provide technical assistance on survey elements in these areas, as needed.

To strengthen the field's understanding of student financing of postsecondary education, we recommend that the National Center for Education Statistics (NCES) incorporates the following topics into the next NPSAS to the best of their ability:

1. Critical data elements:
 - a. Costs of books and educational materials
 - b. Food access and food insecurity
 - c. Housing access, costs, insecurity, and homelessness
 - d. Obligations and costs for childcare and other dependent care

- e. Emergency aid opportunities from the institution
- 2. Priority data elements:
 - a. Enrollment intensity
 - b. Financial precariousness
 - c. Understanding the experiences of justice-involved students
 - d. Stress level from various expenses
- 3. Additional data elements:
 - a. Internet access
 - b. Health insurance access and costs
 - c. Automatic-zero EFC status
 - d. Student refunds

Our recommendations are prioritized based on how they would enhance the field’s understanding of the affordability challenges today’s students face when pursuing higher education. We recognize that these recommendations would require varying degrees of coordination and effort, but each would provide value to policymakers, researchers, and institutions working to improve equity, affordability, and financial aid programs in higher education.

1. Critical data elements:

a. Costs of books and educational materials

Research suggests that forgoing textbooks and other educational materials is a common strategy among college students due to high costs and competing financial pressures. Students report that purchasing course materials is their biggest source of financial stress after tuition, yet we have insufficient national data about how much students—especially low-income students and students of color—are paying for books and materials and what strategies they are using to manage these expenses. Nationally representative data on students’ experiences accessing and purchasing textbooks and digital educational materials would be extremely valuable in better understanding these phenomena and is a high priority item for researchers and policymakers. Questions of interest include:

- How much are students spending on books and other educational resources?
- Do students forgo book purchases for financial reasons?
- What strategies do students employ to reduce book expenses (e.g., sharing with other students, renting textbooks, purchasing older editions, re-selling textbooks)?
- How prevalent are required online access codes that students must use to access textbooks and assignments?
- How prevalent is the use of open educational resources?

b. Food access and food insecurity

Surveys reveal issues of food insecurity among today’s college students. However, nationally representative data on these issues among college students is insufficient, leaving policymakers and researchers unable to adequately answer key questions about food insecurity. We strongly recommend adding questions to NPSAS to measure students’ food insecurity.

NCES should evaluate existing research to determine the most appropriate method of generating reliable data on food insecurity. As models, NCES could consider the United States Department of Agriculture’s (USDA) adult food security survey module or the six-item short form survey module and could explore incorporating screener questions to minimize burden on students and improve accuracy. Both of these tools are made available for researchers studying food insecurity to incorporate into surveys and have been used on particular campuses to evaluate students’ need for support services as well as in nationally representative surveys of adults, including the Current Population Survey’s December Supplement. Adopting food insecurity questions into the NPSAS would yield nuanced, currently unavailable information about the prevalence of food insecurity among college students, where food insecure students are most likely to attend school, and how food insecurity interacts with other student experiences such as enrollment patterns, financial aid receipt, and—through the longitudinal studies—student outcomes.

c. Housing access, costs, insecurity, and homelessness

Better information about students’ experiences with housing insecurity and homelessness is another high priority because information about housing insecurity among college students is even harder to come by

than food insecurity data. As with food insecurity, NCES should examine existing research and survey options for assessing housing insecurity and homelessness, and make a methodological decision based on the advantages and disadvantages of each available survey option. While housing insecurity may be challenging to measure, it is critical that NCES incorporate questions to attempt to measure it to help researchers and policymakers understand the extent of the housing crisis among today's college students, as well as where and for which students it is most severe. This issue of housing security, which is intrinsically tied to the issues of affordability and financial aid that the NPSAS aims to explore, is presently a priority for policymakers, who are seeking better information on the subject.

d. Obligations and costs for childcare and other dependent care

In the 2015-16 NPSAS, just under one-quarter of students (24 percent) were caring for dependents of their own--mostly children.⁸ These figures were significantly higher among students at public two-year and for-profit institutions. Just one-third of student parents complete a degree or certificate within six years of enrollment, however there is evidence that campus child care center usage is associated with higher rates of yearly persistence and on-time completion.⁹ Despite increasing postsecondary enrollment of student parents, the share of institutions with campus child care centers has declined over the past decade. And access to dependent care varies across states, which differ in both the share of institutions providing child care and child care subsidy eligibility requirements.¹⁰ In order to develop policy and practice solutions that better support student parents in the unique challenges they face, better information about the availability, cost and provision of child and other dependent care would be highly valuable to the field. The rich information contained in the NPSAS about the postsecondary experiences of students makes the survey a particularly useful vehicle for assessing the relationships between child care availability, cost, financial aid, and policy. We strongly recommend the addition of questions for student parents regarding:

- Access to dependent care coverage, both during school hours and at other times;
- The amount paid for dependent care, and hours used, per dependent; and
- Whether dependent care is provided by an on-campus entity, other child or dependent care centers, by paid home-based providers, or by unpaid home-based care.

In addition, information about the satisfaction and reliability of child and dependent care and how access to care affects enrollment decisions and other educational choices is of high interest. In some cases, accurate information about this population may require NCES to oversample students with dependents.

e. Emergency aid options from the institution

The most recent NPSAS data indicates that more than half of undergraduates certainly or probably would not be able to cover an unexpected \$2,000 expense. Emergency aid programs have been shown to effectively help students handle these financial shocks. Despite this, the prevalence and design of these programs remains unknown. We strongly recommend that the NPSAS collect information from institutions regarding whether the institution offers emergency aid, whether the aid is provided as a grant or a loan, and whether or not the surveyed students received emergency aid. Furthermore, NPSAS should collect data from students about their awareness of emergency aid options.

2. Priority data elements:

a. Enrollment intensity

Recent studies show students who enroll in 15 credits per semester are more likely to finish their degrees.¹³ This work has influenced the policy conversations, with some suggesting increasing credit requirements for students to be considered full-time, and others advocating for financial aid bonuses to students who take more than 12 credits.¹⁴ However, there is very little information available about how many and which students this policy change would impact and in what ways. Others in the field have raised concerns about such policy changes. Currently, the NPSAS reports whether students are enrolled full-time, half-time, or less than half-time at various points during the year. However, additional variables capturing the number of credits attempted and completed during each term of the school year, or a binary variable indicating whether they are taking 15 or more credits, would provide critical information to help policymakers avoid unintended consequences or inequitable impacts from any policy adjustments.

b. Financial precariousness

The 2015-16 NPSAS added questions about a respondent's potential to cover an unexpected \$2,000

financial expense. We believe this is an excellent start to understanding how prepared students are to handle a financial emergency and would recommend expanding this question to gauge students' ability to handle financial emergencies at different thresholds. Specifically, NCES should measure whether students are able to cover \$100, \$500, and \$2,000 in unexpected expenses. In addition, it would be helpful to ask students about the source that would help them cover this amount (e.g., savings, parents or other family members, an emergency aid program).

c. Understanding the experiences of justice-impacted students

Presently, the NPSAS does not include any variables to capture the experiences of justice impacted students. Given the particularly complex nature of adding currently incarcerated students to the NPSAS sampling frame, and the sensitivity of information on students' broader involvement with the justice system, data collections on these topics should be approached with an abundance of caution. At the same time, given the critical policy conversations taking place on topics such as restoring Pell Grants to incarcerated students, a better understanding of how these students experience postsecondary education could provide important context. NCES should explore the tradeoffs of collecting data on the experiences of justice involved students.

d. Stress level of various expenses

While the NPSAS provides substantial objective details about students' expenses, additional subjective context from students would enrich the information available in the survey. With this in mind, NCES could ask students about the expenses that cause them the most stress, providing better insight into how students perceive their financial circumstances. Understanding which expenses are the most challenging for students can help institution leaders and policymakers effectively leverage their limited resources to support student success.

3. Additional data elements:

1. Internet Access

In our increasingly technology-based economy, internet access is vital to students' college success. NPSAS should collect information about the reliability of students' access to the internet, monthly internet costs, internet connectivity at home, work, and school, and the devices on which students most commonly access the internet for school work.

2. Health insurance access and costs

Information about whether students have health insurance coverage, the source of their coverage (e.g., through their school, work, parents' plans) and how much they pay for coverage would help policymakers understand the health insurance market for undergraduate students and the costs associated with healthcare including out-of-pocket expenses, all of which impact students' ability to afford college.

3. Automatic-Zero EFC status

While the NPSAS already collects student EFCs, the addition of a flag for students who receive an automatic zero would help policymakers understand the experiences of very low-income students. Since NPSAS already leverages data from the Department of Education's Office of Federal Student Aid (FSA), adding data on automatic-zero EFCs through these channels would ensure the information generated is as accurate as possible.

4. Student Refunds

Students rely on their financial aid refunds (the financial aid resources left over from grants, scholarships, and loans after tuition and fees and other school charges are paid) to cover their non-tuition college costs. When and in what form students receive their refund varies from institution to institution. Better data on the timing of disbursements of student aid refunds would shed light on students' experiences accessing their financial aid at the times needed to pay their expenses.

The undersigned members and partners of PostsecData applaud the Department of Education and NCES for developing and maintaining the NPSAS, promoting high-quality data for research and evaluation, and keeping the higher education community informed about the state of aid and affordability in higher education. We look forward to seeing postsecondary data become more transparent, comprehensive, and efficient with your support. If you have any

questions about these comments, please contact Mamie Voight, vice president of policy research at the Institute for Higher Education Policy (mvoight@ihep.org or 202-587-4967).

Sincerely,

Alloy Engineering Co. Inc.
California EDGE Coalition
Campaign for College Opportunity
Colorado Center on Law and Policy
Consumer Action
Georgetown University Center on Education and the Workforce
GW Institute of Public Policy, George Washington University
Institute for Higher Education Policy (IHEP)
Jorge Klor de Alva, President, Nexus Research and Policy Center
NASPA - Student Affairs Administrators in Higher Education
Nate Johnson, Principal Consultant, Postsecondary Analytics
National Association for College Admission Counseling (NACAC)
National Association of Student Financial Aid Administrators
National Center for Higher Education Management Systems
New America Higher Education Initiative
NIRSA: Leaders in Collegiate Recreation
Public Insight
Skills2Compete - Colorado
Stephanie Hall, The Century Foundation
Steven Tamasi, CEO, Boston Centerless
Student Veterans of America
The Education Trust
The Institute for College Access & Success (TICAS)
uAspire

NCES Response to Comment on Support of NPSAS:20 and Inclusion of New Measures

Dear Members of the Postsecondary Data Collaborative,

Thank you for your thoughtful and constructive feedback posted on June 12, 2019 responding to a 30-day request for comments on the proposed 2019–20 National Postsecondary Student Aid Study (NPSAS:20) Institution Collection. The National Center for Education Statistics (NCES) appreciates the support the Collaborative provides for the success of this study and the encouragement of innovative methods such as NPSAS:18-AC.

Many of your suggestions for improvements to the study were implemented in NPSAS:16 or are planned to be included in NPSAS:20. Please note that the information collection request currently under public review is the institution portion of the NPSAS:20 collection. The student portion of NPSAS:20, including the proposed student interview questions is expected to become available for public review later this July.

Some of your suggestions require the addition of new or altered survey questions. As with all new and revised items, we would need to test the proposed items with students to ensure comprehension before including in a full-scale data collection. At this point in the survey schedule, we are unable to accommodate additional testing for NPSAS:20, but will consider doing so for future longitudinal surveys and NPSAS:24 where applicable.

Below, we discuss each of your suggestions in order.

1. Critical data elements:
 - a. Cost of books and education materials.

We agree that measures of the costs of books and education materials are critical data elements to NPSAS.

To this end, we developed student survey questions for NPSAS:16 in collaboration with the National Association for College Stores. This same item set will be included for the NPSAS:20 interview respondents:

- CSTBKSDG – Cost of digital textbooks
- CSTBKSPR – Cost of print-only textbooks
- CSTSUPP – Cost of required supplies
- CSTTECH – Cost of required technology
- CSTOTHER – Cost of other required course materials
- CSTTOTAL – Total course of required course materials

Additionally, the NPSAS Restricted Use Files (RUF) contain source variables surrounding the budgeted amount for book/supplies and computer technology as components for the Cost of Attendance and budget measures.

While these items are tested measures for the cost of books, we currently do not have items surrounding the decisions students make around the purchase of books and supplies. Future data collections will consider questions through which these decisions can be measured.

b. Food access and food insecurity

NPSAS:20 plans to field 10 items about the issues of food access and food insecurity. We worked with the U.S. Department of Agriculture (USDA) and researchers such as those at the HOPE Center to identify extant items proven to address research and policymaking needs on these topics. These items were tested and refined, presented at the NPSAS:20 Technical Review Panel, and then further improved in preparation for the full-scale data collection.

c. Housing access, costs, insecurity and homelessness

Issues regarding housing and homelessness were addressed in NPSAS:16, which was the first administration of NPSAS that expanded the FAFSA-based measure of homelessness to include all respondents. Additionally, measures of mortgage and home ownership have been included in past NPSAS administrations. These variables are:

- HOMELESS2 – At risk of homelessness or homeless
- MNTRENT – Monthly mortgage or rent amount
- HOMESTUD – Student owns home or pays mortgage

NCES and its contractor examined measures of homelessness and will include an additional measure in NPSAS:20 based upon the definition in the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11434a(2)). This item was presented at the NPSAS:20 Technical Review Panel and will be further refined prior to full-scale data collection. NPSAS does not have an item that directly captures housing insecurity. However, the McKinney-Vento based item does capture the places students have slept.

Future data collections will consider questions pertaining to housing insecurity.

d. Obligations and costs for childcare and other dependent care

As noted in your communication, NPSAS measures the cost of dependent care for respondents for both children in paid childcare and costs associated with other dependents. In the future, NCES will explore asking questions regarding care provider options and other relevant measures. We have considerable experience asking parents about nonparental care for their children given other studies fielded by NCES including the Early Childhood Program Participation Survey that is part of our National Household Education Surveys (NHES), OMB# 1850-0768. This should facilitate item development for future NPSAS collections.

e. Emergency aid opportunities from the institution

NPSAS:20 plans on including questions on the student survey about institution emergency aid. The questions will capture the awareness of emergency aid and whether the student applied and received emergency aid from the institution. We are also able to identify the form of this aid (e.g., loans, grants, etc.) given data collected in NPSAS. The student survey items were developed and refined with the aid of the NPSAS:20 Technical Review Panel.

However, we do not ask each institution explicitly whether or not they offer emergency aid. We may be able to add such questions to future NPSAS collections and will coordinate with colleagues who manage the Integrated Postsecondary Education Data System (IPEDS) to determine if such information can be readily collected in that study and subsequently linked to NPSAS. The IPEDS collections are fielded annually to all institutions in the Title IV program and IPEDS data act as the initial sampling frame for NPSAS.

2. Priority data elements

a. Enrollment intensity

Thank you for this suggestion. The student records instrument currently collects “Hours enrolled” at the term level which is provided on the RUF for NPSAS:16. Throughout NPAS:20 data collection, NCES and its contractor will monitor data quality and missingness for these items with the aim of providing a variable that will meet these needs. We also encourage researchers interested in academic momentum and how it relates to persistence and attainment to use postsecondary transcript data available from the Beginning Postsecondary Students Longitudinal Study (BPS).

b. Financial precariousness

Thank you for this suggestion. As you noted, NPSAS:16 asked students about their ability to come up with \$2,000 to cover unexpected needs. We received recommendations similar to yours from the NPSAS:20 TRP to include lower monetary thresholds. Based on those discussions, NPSAS:20 will also ask about the ability to “come up with \$500.” Lower monetary levels will be considered for NPSAS:24.

c. Understanding the experiences of justice-impacted students

This is an important topic for many reasons. However, collecting representative information about justice-impacted students is challenging in the context of NPSAS. First, it is important to note that previous administrations of NPSAS have included incarcerated individuals who were later released and completed an interview, although we have not included this population as an analytic domain. Next, because there are very few of these individuals, we would need to oversample them in order to obtain sufficient numbers of them to be representative of the population. Currently, we do not seek this information on the enrollment lists provided by institutions to NCES. We would need to evaluate whether such information could be provided consistently across institutions, and if institutions would share such information. As such, this would need to be a longer-term development initiative that could not be started before NPSAS:24 planning gets underway.

d. Stress level of various expenses

Thank you for highlighting the issue of students’ subjective experiences with stress and expenses. Given the complicated nature of these concepts, prior to fielding a full-scale measure, these items would need to undergo rigorous cognitive testing followed by a field test in order to ensure reliability. NCES will consider questions regarding these concepts, but will not be able to include them in NPSAS:20.

3. Additional data elements

a. Internet access

In order to provide a measure of internet access, we could borrow items from extant studies such as the Current Population Survey (CPS) and items developed for it by the National Telecommunication and Information Administration. However, item sets would need to be tested in the context of a postsecondary student-level survey. We do not have time to test such items for inclusion in NPSAS:20, but they could be considered for future NPSAS collection.

In the interim, NCES will explore using extant area-level data such as geocoded data matched to the American Community Survey (ACS).

b. Health insurance access and costs

Thank you for the comment regarding issues surrounding student health insurance. In this domain, NPSAS:16 has the variable GAINSUR – “Graduate assistantship: included health insurance” which only applies to graduate students. NPSAS:20 will include the same measure. In the future we will explore the option of expanding this item to undergraduates.

c. Automatic-Zero EFC status

We recognize the benefit to researchers and policymakers of including an indicator for students who receive automatic-zero EFC. This data element is currently on the NPSAS:16 RUF in variable C16EFCZR. We will work with our colleagues in the Office of Federal Student Aid (FSA) to assess the feasibility of providing a variable using these data on our public facing tools.

d. Student Refunds

NPSAS:16 currently provides variables measuring the receipt of a refund and the method for receiving the refund, both based on self-reports from the student interview. These variables are:

- REFUND1 – Received a refund of scholarships, grants, or loans from NPSAS
- REFUND2 – Method of receiving refund from NPSAS
 - o Deposit refund directly to bank account
 - o Cash or deposit refund at a bank yourself
 - o Cash somewhere other than a bank
 - o Receive refund on prepaid debit card
 - o Receive refund through student ID card
 - o Do something else not listed

In the future we will take into consideration questions surrounding the timing of these disbursements.

Again, thank you for your continued support of NPSAS and thoughtful suggestions on how we may improve both NPSAS:20 and future iterations of the study.

Sincerely,

James Woodworth, PhD
Commissioner
National Center for Education Statistics
Institute of Education Sciences
U.S. Department of Education