

# Public Comments Received During the 30-day Comment Period

November 2023

## 2023–24 National Postsecondary Student Aid Study (NPSAS:24) Full-Scale Study Student Data Collection and Student Records

ED-2023-SCC-0176

Comments on FR Doc # 2023-21408

*NCES and the staff of The National Postsecondary Student Aid Study want to thank all public commenters for your feedback responding to a request for comments on NPSAS:24 published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in our work. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment and hope that you will continue to follow our work.*

### **Organization: Student Veterans of America**

Student Veterans of America (SVA) submits this comment in response to the Department of Education’s (hereinafter “the Department”) request for comment on its proposed 2023-24 National Postsecondary Student Aid Study. This comment focuses exclusively on the importance of disaggregating data on military-affiliated students by beneficiary type.

Established in 2008, SVA is a national nonprofit founded to empower student veterans as they transition to civilian life by providing them with the resources, network support, and advocacy needed to succeed in higher education and beyond. With chapters throughout the country and overseas, SVA establishes a lifelong commitment to each student’s success, from campus life to employment, through local leadership workshops, national conferences, and top-tier employer relations. As the largest chapter-based student organization in America, we are a force and voice for the interests of veterans in higher education, and SVA places the student veteran at the top of our organizational pyramid.

### **Data Disaggregation Among Military-Affiliated Students**

The National Postsecondary Student Aid Study (NPSAS) provides critical insights into the state of higher education and how it is serving learners of all different backgrounds, including military-affiliated students. SVA appreciates the Department’s efforts to carry out this essential study. We comment below on the importance of disaggregating data on military-connected students.

SVA is grateful that NPSAS seeks to incorporate data on students who receive federal veterans education benefits. However, the lack of further disaggregation among those receiving these benefits limits the ability of the federal government and other stakeholders to gain useful insights into their higher education experiences. The study indicates it identifies those who receive federal veterans education benefits by running an administrative data match with the Veterans’ Benefits Administration (VBA), but that data includes all beneficiaries including current servicemembers, veterans, dependents, and survivors. This makes it nearly impossible to glean insights into any one of these cohorts specifically. This is problematic because these different groups’ experiences can vary greatly. This is no small issue. In 2022, dependents and survivors made up more than 20 percent of all VA education beneficiaries, and for the Post-9/11 GI Bill—the most popular education benefit at VA—non-veterans accounted for more than a quarter of the program’s total beneficiaries.<sup>1</sup>

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<sup>1</sup> U.S. DEPARTMENT OF VETERANS AFFAIRS, VETERANS BENEFIT ADMINISTRATION, ANNUAL BENEFITS REPORT FISCAL YEAR 2022 REPORT 154,159 (2023), available at <https://www.benefits.va.gov/REPORTS/abr/docs/2022-abr.pdf>.

This issue is easily remedied. VBA already disaggregates education benefit data by beneficiary type.<sup>2</sup> We recommend that ED simply incorporate this disaggregation into the NPSAS design and methodology. ED currently disaggregates by subcategory for institution type, race and ethnicity, and gender, among others. It is critical that the Department do the same for military learners if we are to glean useful insights about their higher education experiences.

We also strongly encourage the Department to continue exploring ways to fill gaps in the current data on military-affiliated students. Large numbers of veterans are excluded from current data sets because they are often identified solely based on use of benefits. Many veterans transfer their benefits, have exhausted their benefits, or may otherwise not have access to or be using their education benefits. It is imperative that research accounts for these students in addition to their benefit-using peers.

We thank the Department for its commitment to student veterans in higher education, and we appreciate its attention to this comment. If you have any questions, please feel free to contact Justin Hauschild directly by phone at 202-223-4710 or by email at [justin.hauschild@studentveterans.org](mailto:justin.hauschild@studentveterans.org).

Sincerely,  
Justin Hauschild  
Policy Counsel  
Student Veterans of America

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Dear Mr. Hauschild:

We appreciate your interest in NPSAS:24 and want to thank you for your suggestion that the Department incorporate the disaggregated Veterans' Benefits Administration's (VBA) education benefit data by beneficiary type into the NPSAS:24 design.

NPSAS:24 has a complex two-stage sampling design that was developed and approved in 2022, in advance of the 2023 field test and 2024 full-scale (main) data collection. As we are already in institution contacting for the full-scale collection, we are too late in the process to consider making changes to the design now. Consequently, we are not able to consider increasing the sample size or over-sampling military students by type of benefit received. We will consider it for the next round of NPSAS, which will allow us an opportunity to review the available data and pretest the process.

In the interim, we would like to direct you to the NPSAS:20 data available through PowerStats on the NCES DataLab website: <https://nces.ed.gov/datalab/>. In PowerStats, you can generate your own tables and regressions.

For instance, in the NPSAS:20 Undergraduate PowerStats, we include variables on veteran's benefits (VETBEN), military type (MILTYPE and MILTYPE2), and type of recipient of federal veterans' education benefits (VETBENSRC).

As suggested, we will continue to explore additional data sources to help us better identify military-affiliated students.

Sincerely,

Tracy Hunt-White  
National Postsecondary Student Aid Study  
Longitudinal Surveys Branch  
National Center for Education Statistics  
U.S. Department of Education  
Office: 202-245-6507

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<sup>2</sup> See generally U.S. DEPARTMENT OF VETERANS AFFAIRS, VETERANS BENEFIT ADMINISTRATION, ANNUAL BENEFITS REPORT FISCAL YEAR 2022 REPORT 154-159 (2023), available at <https://www.benefits.va.gov/REPORTS/abr/docs/2022-abr.pdf>.

## **Organization: National Center for Learning Disabilities (NCLD)**

On behalf of the National Center for Learning Disabilities (NCLD), which works to improve the lives of individuals with learning disabilities, we appreciate the opportunity to provide comments on the 2023-24 National Postsecondary Student Aid Survey (NPSAS:24) Full-Scale Study-Student Data Collection and Student Records.

### **I. Overall Response**

NCLD has concerns about the way in which federal surveys, including NPSAS:24, identifies individuals who have a disability are significantly under-representing individuals with a specific learning disability. The term “specific learning disability” means a disorder in 1 or more of the basic psychological processes involved in understanding or in using language, spoken or written, which disorder may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations<sup>3</sup>.

In K-12 education, 2.3 million students, or approximately 5% of all students in public schools, are identified as having a specific learning disability<sup>4</sup>. In NPSAS:20, only 0.74% of students identified having a “specific learning disability of dyslexia” as the main type of impairment. NCLD recognizes that the differences between Child Find provisions in the Individuals With Disabilities Education Act and self-disclosure in a postsecondary environment and on a survey will explain some of the discrepancy between these data points, as well as the recognition that some students do not pursue a postsecondary education, but it does not explain all of it. As another comparison, the High School Longitudinal Study of 2009 showed that 3.3% of students enrolled in a 4-year institution and 4.5% of students in a 2-year institution identified as “ever having a learning disability.” For these reasons, NCLD is concerned that the 0.74% of students in the NPSAS:20 survey is a significant under-representation of those with a specific learning disability.

In NPSAS:24, as well as for future NCES surveys, NCLD recommends that the federal government address these data quality issues by conducting audits and field tests with other screening items to determine why there is significant underrepresentation of individuals with specific learning disabilities on the surveys compared to prevalence rates in K-12 and in other literature. Under-representation of people with disabilities, a protected class under civil rights laws, impacts the validity of the findings and has implications for being able to make evidence-based policy and practice decisions.

### **II. Specific Recommendations**

We offer the following recommendations to improve NPSAS:24.

#### **Recommendation 1: Maintain inclusion of N24FHSLSD44 and N24FHSLSD45.**

NCLD strongly supports the inclusion of N24FHSLSD44 and N24FHSLSD45, an addition to NPSAS:24 described in Table 1 of Appendix K, Student Survey Instrument. These questions seek to determine if a student disclosed their disability at their institution of higher education and received accommodations from the institution.

**Rationale:** Disclosing a disability and requesting reasonable accommodations at an institution of higher education is not required, and data collected about students who do so is beneficial to a number of stakeholders, including students and families, colleges and universities, and even high school or Vocational Rehabilitation transition personnel who, in accordance to IDEA and WIOA, provide post-high school transition services to

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<sup>3</sup> Individuals with Disabilities Education Act (20 U.S.C. § 1400, et.)

<sup>4</sup> Individuals with Disabilities Education Act 618 Data, 2020-21.

students. As cited in Appendix K, these questions were utilized in the High School Longitudinal Study (HSLs) of 2009 and insightful findings were published in a [2022 NCES brief](#). However, it is important that updated data on this is collected on this information.

**Recommendation 2: Remove “special need” from N24FHSLSD44 and N24FHSLSD45.**

*N24FHSLSD44: [If T\_CURENR= 1] Have you informed {else} Did you inform] [NPSAS institution] that you have a disability ~~or special need~~?*

*N24FHSLSD45: [If currently attending NPSAS institution] Have you received {else} Did you receive] accommodations or services for your disability ~~or special need~~ from [NPSAS institution], such as early registration, test taking accommodations, or counseling?*

**Rationale:** The term “special need” is outdated<sup>5</sup> and disability is sufficient here.

**Recommendation 3: Remove “significantly” from N24FDISABLE and its Help Text.**

*N24FDISABLE: Do you have any conditions or disabilities that ~~significantly~~ affect your experience as a student at [NPSAS institution], including how you learn or perform academically, [if N24BONLINEP = 0] interact with others, or access campus {else} or interact with others]?*

1 = Yes

0 = No

***Help Text:***

*Answer **Yes** if you have any conditions or disabilities that ~~significantly~~ affect your experience as a student, including how you learn or perform academically, interact with others, or access the campus.*

**Rationale:** The term “significantly” is subjective and might result in some students with a disability selecting no, resulting in under-representation in this survey. Moreover, it is not used in the definition of a disability under Section 504 of the Rehabilitation Act or the Americans with Disabilities Act. We have concerns that this question, as worded, will under-represent students with disabilities in the NPSAS:24 survey.

**Recommendation 4: Amend Help Text for N24FACS17A to better identify individuals with learning disabilities and ADHD.**

*N24FACS17A: Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions?*

1 = Yes

0 = No

***Help Text:***

*Answer **Yes** if it is sometimes or always ~~very~~ difficult ~~or impossible~~ to remember or concentrate, if you forget to eat, forget to take medication, if you have Alzheimer's disease or dementia, or if you have a ~~serious specific~~ learning disability ~~or attention-deficit/hyperactivity disorder (ADHD)~~.*

*This question is in accordance with the U.S. Department of Health and Human Services (HHS) [data collection standards for identifying disability status](#). Your responses will not affect any aid or other benefits that you may receive. Your responses, combined with any student record information, may be used for statistical purposes,*

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<sup>5</sup> See AUCD's resource: [https://www.aucd.org/docs/add/sa\\_summits/Language%20Doc.pdf](https://www.aucd.org/docs/add/sa_summits/Language%20Doc.pdf)

and will not be disclosed, or used, in personally identifiable forms for any other purpose, except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

**Rationale:** Some elements of the help text are subjective and may fail to identify individuals who have a specific learning disability when responding to item N24FACS17A. Moreover, the term specific learning disability is used in N24FMAIN so the help text should align with that.

**Recommendation 5: Amend the text for the specific learning disability option and the Help Text for N24FMAIN to better align with N24FDISABLE.**

*N24FMAIN: Which of the following conditions or impairments have the most significant impact on your daily activities? (Please check all that apply.)*

- Hearing impairment (e.g., deaf or hard of hearing)
- Blindness or visual impairment that cannot be corrected by wearing glasses
- Speech or language impairment
- Orthopedic or mobility impairment
- Specific learning disability ~~or~~ (e.g., dyslexia, **dyscalculia, dysgraphia**)
- Attention-deficit/hyperactivity disorder (ADHD)
- Autism spectrum
- Health impairment or problem (e.g., asthma, diabetes, Chron's disease, etc.)
- Mental, emotional, or psychiatric condition (e.g., depression, post-traumatic stress disorder [PTSD], schizophrenia, etc.)
- Intellectual disability
- Brain injury
- Other condition or impairment

**Help Text:**

*From the options provided, select which conditions or impairments have the most significant effect on your daily activities, **including how you learn or perform academically, interact with others, or access campus.***

**Rationale:** Dyslexia<sup>6</sup> is a type of specific learning disability so the usage of “or” does not accurately reflect this categorization. In addition to dyslexia, there are other specific learning disabilities such as dyscalculia, which impacts mathematics and numeracy, dysgraphia, which impacts writing, amongst others.

The goal of NPSAS and these questions is to understand the impact of a student’s conditions or impairments on their educational experiences. It is clear from the N24FDISABLE that this is the goal, but not providing more context for “daily activities” for this item could impact which conditions or impairments an individual self-selects.

NCLD appreciates the opportunity to provide comments on NPSAS:24 and improve federal data collection on postsecondary students with disabilities. If we can provide additional information, please contact me at lkubatzky@nclld.org.

Sincerely,  
Lindsay Kubatzky  
Director of Policy and Advocacy  
National Center for Learning Disabilities

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Dear Mr. Kubatzky:

<sup>6</sup> American Psychological Association. (2022). Neurodevelopmental Disorders. In Diagnostic And Statistical Manual Of Mental Disorders : DSM-5-TR (5th Edition, Text Revision)

We appreciate your feedback on item wording in the student survey prepared for the 2023-24 National Postsecondary Student Aid Study (NPSAS:24). We share a common goal that NPSAS:24 be representative of all students enrolled in postsecondary education during the 2023-24 academic year, including students with disabilities. We have reviewed your recommendations carefully and, although there will not be an opportunity to pretest the new wording, we will make the revisions outlined below in order to remove outdated language and improve comprehension.

- (1) We will remove all occurrences of “special need” from NPSAS:24 survey items and help text (Recommendation 2);
- (2) We will remove the word, “significantly,” as a qualifier in the survey item, N24DISABLE, and the associated help text (Recommendation 3);
- (3) We will update the help text for N24FMAIN to align with the help text in N24DISABLE (Recommendation 4); and
- (4) We will amend survey items and help text to better identify students with specific learning disabilities and ADHD (Recommendation 5).

These changes seem minor, but we cannot anticipate the effect these changes will have on the representativeness of students with disabilities in NPSAS:24 nor when compared to prior administrations of the NPSAS survey (most recently fielded in 2020). Moving forward, NCES will continue to explore the quality and completeness of the disability item set through qualitative testing and in consultation with the study Technical Review Panel, other federal statistical agencies, and advocacy groups such as yours.

Sincerely,

Tracy Hunt-White  
National Postsecondary Student Aid Study  
Longitudinal Surveys Branch  
National Center for Education Statistics  
U.S. Department of Education  
Office: 202-245-6507