



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) incorporate 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.¹ 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.² 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)?

¹ Vitez, K. (2018). *Open 101: An action plan for affordable textbooks*. Student PIRGS. Retrieved from: <https://studentpirgs.org/reports/sp/open-101-action-plan-affordable-textbooks>

² Cengage. (2018, July 26). New survey: College students consider buying course materials a top source of financial stress. Retrieved from: <https://news.cengage.com/corporate/new-survey-college-students-consider-buying-course-materials-a-top-source-of-financial-stress/>

- 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.³ 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.⁴ 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.⁵ 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

³ Goldrick-Rab, S., Richardson, J. & Kinsley, P. (2018). *Annotated bibliography: Basic needs insecurity among college students*. Wisconsin HOPE Lab. Retrieved from: <https://hope4college.com/wp-content/uploads/2018/09/Basic-Needs-Studies-Annotated-Bibliography.pdf>

⁴ U.S. Department of Agriculture. (Accessed 2018, November 13). Survey Tools. Retrieved from: <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/survey-tools>.; Nikolaus CJ, Ellison B, Nickols-Richardson SM (2019) Are estimates of food insecurity among college students accurate? Comparison of assessment protocols. *PLoS ONE* 14(4): e0215161. <https://doi.org/10.1371/journal.pone.0215161>.; Goldrick-Rab, S., Richardson, J. & Kinsley, P. (2018). *Guide to assessing basic needs insecurity in higher education*. Wisconsin HOPE Lab. Retrieved from: <https://hope4college.com/wp-content/uploads/2018/09/Basic-Needs-Insecurity-College-Students.pdf>.; HOPE Center for College, Community, and Justice. (Accessed 2018, November 13). Retrieved from: <https://hope4college.com/>.

⁵ Blagg, K., Whitmore-Schanzenbach, D., Gundersen, C., & Ziliak, J. (2017). *Assessing food insecurity on campus*. Urban Institute. Retrieved from Social Science Premium Collection Retrieved from <https://search.proquest.com/docview/1935700916>.

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.⁶ 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.⁷

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:

⁶ Goldrick-Rab, S., Richardson, J. & Kinsley, P. (2018). *Guide to assessing basic needs insecurity in higher education*. Wisconsin HOPE Lab. Retrieved from: <https://hope4college.com/wp-content/uploads/2018/09/Basic-Needs-Insecurity-College-Students.pdf>.

⁷ Office of Sen. Chris Murphy. (May 2019). The hidden cost of college: Addressing food and housing insecurity among college students. Retrieved from: <https://www.murphy.senate.gov/download/basic-needs-insecurity-report.>; Harris, A. (Jan 2019). Millions of college students are going hungry. *The Atlantic*. Retrieved from: <https://www.theatlantic.com/education/archive/2019/01/college-student-hunger/579877/>.

⁸ Institute for Higher Education Policy analysis of the U.S. Department of Education, National Center for Education Statistics, 2015-16 National Postsecondary Student Aid Study (NPSAS:16). Computation by NCES PowerStats on 10/25/2018.

⁹ Eckerson, E., Talbourdet, L., Reichlin, L., Sykes, M., Noll, E. & Gault, B. (2016). *Child care for parents in college: A state-by-state assessment*. Institute for Women's Policy Research. Retrieved from: <https://iwpr.org/wp-content/uploads/wpallimport/files/iwpr-export/publications/C445.pdf>.

¹⁰ Ibid.

- 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.¹¹ Emergency aid programs have been shown to effectively help students handle these financial shocks.¹² 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.¹⁵

¹¹ Institute for Higher Education Policy analysis of the U.S. Department of Education, National Center for Education Statistics, 2015-16 National Postsecondary Student Aid Study (NPSAS:16). Computation by NCES PowerStats on 10/25/2018.

¹² Geckeler, C. (2008). *Helping community college students cope with financial emergencies*. MDRC. Retrieved from: <https://www.mdrc.org/publication/helping-community-college-students-cope-financial-emergencies>

¹³ Belfield, C., Jenkins, D., & Lahr, H. (2016). *Momentum: The academic and economic value of a 15-credit first-semester course load for college students in Tennessee*. Community College Research Center. Retrieved from: <https://ccrc.tc.columbia.edu/media/k2/attachments/momentum-15-credit-course-load.pdf>.

¹⁴ Ibid.

¹⁵ Goldrick-Rab, S. (2016). The perils of pushing students. Retrieved from <https://medium.com/@saragoldrickrab/the-perils-of-pushing-students-25c49fd645b8>.

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:

a. 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.

b. 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.

c. 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.

d. 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
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The Institute for College Access & Success (TICAS)
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