

September 11, 2017

Kate Mullan
Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Ave, SW
LBJ, Room 2E103, Washington, DC 20202
(submitted electronically via regulations.gov)

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use the 2007-08 state oversample for California to inform state policy discussions, but the data are now quite outdated.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.¹ 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.²

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,

A handwritten signature in black ink, appearing to read "Diane Cheng". The signature is fluid and cursive, with the first name "Diane" and last name "Cheng" clearly distinguishable.

Diane Cheng
Associate Research Director

¹ TICAS. 2016. *On the Sidelines of Simplification: Stories of Navigating the FAFSA Verification Process*. <https://ticas.org/content/pub/sidelines-simplification>.

² See, for example, TICAS. 2010. *After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid*. <https://ticas.org/content/pub/after-fafsa>. This analysis used institution-level data from 13 California community colleges and found that, while few students' Pell-eligibility status changed after verification in the 2007-18 year, applicants selected for verification were less likely to receive Pell Grants. Including verification data in NPSAS:18-AC would allow analyses like this to be conducted at the national level, for states overall, and for public 2-year and 4-year colleges within states.