



September 1, 2017

Kate Mullan
Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW.
LBJ, Room 224–84
Washington, DC 20202–4537

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

Docket No.: ED–2017–ICCD–0102

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

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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,

A handwritten signature in black ink, appearing to read "Chris P. Chapman".

Christopher P. Chapman
President and Chief Executive Officer