December 2, 2024

Stephanie Valentine, PRA Coordinator
Strategic Collections and Clearance, Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202-8240

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; 2020/25 Beginning Postsecondary Students (BPS:20/25) Full-Scale Study (Docket No.: ED-2024-SCC-0136)

Dear Coordinator Valentine,

EdTrust is a national nonprofit organization that is committed to advancing policies and practices to dismantle the racial and economic barriers embedded in the American education system. Through our research and advocacy, EdTrust improves equity in education from preschool through college, engages diverse communities dedicated to education equity and justice, and increases political and public will to build an education system where all students thrive.

EdTrust thanks the U.S. Department of Education ("the Department") for the opportunity to comment on the call for comments on the 2020/25 Beginning Postsecondary Students (BPS:20/25) Full Scale Study. Our responses to the provided prompts are below:

1. **Is this collection necessary to the proper functions of the Department;**

Yes, this collection is necessary to enable equity and accountability, monitor progress, promote transparency, and boost the use of evidence-based research. Understanding the return on investment of education at all levels has more of a focus today, and the 25 Beginning Postsecondary Students (BPS) survey provides insight into what student experiences may foster, or hinder persistence, and how certain experiences could shape employment outcomes. Data collection is crucial for identifying disparities in student experiences because the BPS is currently the only national data source on first-time students' experiences during and after postsecondary. This information provides a clear understanding of where inequities exist and helps formulate evidence-based targeted interventions to ensure all students have equitable access to educational opportunities. Without comprehensive data, it would be challenging to measure progress toward equity goals or hold institutions accountable for closing achievement gaps effectively. Additionally, publication allows the public to have fair access to post-secondary data. Without the study, a significant gap would be created, because the information

needed to understand the student progression to achieving a postsecondary degree would be more difficult for [organizations and researchers](#) to access.

2. **Will this information be processed and used in a timely manner;**

Yes, regular data collection allows for ongoing and responsive monitoring of student progress and the evaluation of policies and initiatives designed to improve persistence and completion rates in postsecondary education. It also helps assess how students' experiences in college may impact future employment outcomes, as well as changes over time in their income, debt, and more. Additionally, the BPS study allows researchers to disaggregate the student experience, providing a deeper understanding of how different student groups experience and are impacted by their education. The BPS has enabled researchers to track changes over time to advocate for more targeted efforts to address disparities.

3. **How might the Department enhance the quality, utility, and clarity of the information to be collected;**

EdTrust recommends the following questionnaire considerations to be implemented on future collections:

Consider how to implement survey questions inquiring about students' experiences with discrimination and campus climate.

While the BPS conducts surveys on peer and faculty interactions and socioemotional support, the scope should be expanded to include questions addressing experiences with discrimination on campus and the local community across a broad spectrum, such as race, ethnicity, gender identity, sexual orientation, disability, and socioeconomic status. For instance, surveys could assess students' awareness of discrimination and harassment policies, their understanding of procedures for filing cases, and their experiences with both overt incidents and subtle forms of bias or exclusion. This data would provide valuable insights into [campus climate](#) and what type of environments may impact the [student experience](#) and matriculation process. Research has shown that a strong sense of belonging can be a preventive factor for students stopping out, particularly for students of color. Additionally, having a deeper understanding of campus climate aids in assessing students' sense of belonging. This knowledge can help institutions create more inclusive environments and support systems to retain [diverse student populations](#).

Consider how to implement survey questions inquiring about students' experiences with homelessness, food insecurity, accessing public assistance resources, and other basic needs.

While BPS surveys for help and support from family and friends and employment, the scope should be expanded to survey for experiences with food insecurity and the ability to fulfill [basic needs](#). College students experiencing [food insecurity](#), which is the inability to consistently access enough food for an active, healthy life, is a significant and growing issue. Questions

should be clear and specific to address a range of experiences, such as struggles with housing stability, inconsistent access to nutritious food, or difficulties navigating public assistance programs. This can be implemented by having a food insecurity or basic needs status survey item, which would be recorded regularly during check-ins. The Department should also survey students' knowledge on the availability and access to campus and community resources, such as the accessing Supplemental Nutrition Assistance Program (SNAP) benefits, food pantries, and more.

4. **How might the Department minimize the burden of this collection on the respondents, including through the use of information technology;**

The Department should provide timely, clear, and responsive communications and technical assistance to institutions. These communications and training will help minimize the reporting burden for institutions and clarify the best practices on data reported under both old and new standards. The Department should allocate resources to assist colleges in ensuring their students are submitting responses. The Department should ensure updated user manuals, FAQ pages, information text boxes, and data dictionaries include information about new data elements.

We thank you for your consideration and for the opportunity to comment. Should you have any questions regarding the content of this letter, please contact Reid Setzer (rsetzer@edtrust.org), director of Government Affairs, or Sabreyna Reese (sreese@edtrust.org), research analyst for Higher Education.

Sincerely,
EdTrust