



September 11, 2017

Kate Mullan
Acting Director, Information Collection Clearance Division
U.S. Department of Education

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

Docket No.: ED–2017–ICCD–0102

Dear Acting Director Mullan:

We are writing in response to the 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. The Wisconsin HOPE Lab strongly urges you to add standardized measures of food and housing insecurity to the next administration of the NPSAS.

The Wisconsin HOPE Lab is the nation’s only translational research laboratory aimed at making college more affordable. We study the costs of attending college; explore approaches to help students and families contend with those costs; and experiment with approaches to lowering costs while ensuring that students earn degrees of value.

Over the past decade, we have been studying basic needs insecurity among college students and our research indicates that a significant share of undergraduates is food and/or housing insecure. Our most recent study, [Hungry and Homeless in College](#), found that more than half of community college students struggle to obtain adequate food and/or housing. In light of this evidence, scholars, practitioners and policymakers need additional data to confirm these findings and create a clear national picture of the prevalence of food and housing insecurity among today’s undergraduates.

The National Postsecondary Student Aid Study includes information from a nationally representative sample of postsecondary students, making it ideal to track the prevalence and correlates of basic needs insecurity among college students. The goal of the NPSAS is to learn about how students and their families finance education beyond high school. It is our position that adding questions about food and housing insecurity would provide policymakers with information required to assess the efficacy of Federal Student Aid in meeting students’ basic needs.¹ It would also highlight the need for new programs to alleviate hunger and homelessness among undergraduates, assist practitioners in examining how affordable college really is for their students, and enable researchers to produce a more accurate picture of the material challenges inhibiting student success and college completion.

¹ Despite claims in a recent Urban Institute [report](#) that the Current Population Survey (CPS) provides nationally representative information on students’ food security, the CPS is a nationally representative study of households, not students, and today’s students do not fit well into households as explained in detail [here](#).

We strongly recommend that the NPSAS include standardized measures of food and housing insecurity so that results can be compared to other studies. To aid in these efforts, we have created a [Guide to Assessing Basic Needs Insecurity in Higher Education](#) with detailed measurement recommendations. Specifically, the U.S. Department of Agriculture has validated an 18-item, 10-item, and 6-item version of the food security survey module. Any of the three scales could be used, but should be used in full. For details on selecting a food security survey module, see <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/survey-tools/>. These USDA survey modules are used on several national surveys including the CPS, SIPP and in Feeding America's National Report. Similarly, we recommend that the NPSAS include standardized measures of housing insecurity and homelessness, such as those found on the SIPP, conducted by the U.S. Census Bureau and described in detail in the Wisconsin HOPE Lab's *Guide to Assessing Basic Needs Insecurity in Higher Education* available at <http://wihopelab.com/publications/Basic-Needs-Insecurity-College-Students.pdf>.

Thank you for considering our recommendation. Please contact me at SGR@Temple.edu if you have any questions or would like additional information.

Sincerely,

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