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U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

November 2, 2020

RE: Docket No. ED-2020-SCC-0142

To Whom It May Concern:

This letter is submitted on behalf of the 28 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is a coalition of diverse organizations that recognize the power of high-quality data to ensure equitable access and success in higher education. The coalition advocates for the use of postsecondary data to inform students and families in making college choices, inform federal, state, and institutional policies, and support college administrators and faculty in promoting student success.

PostsecData strongly supports the vital role that the 2020/22 Beginning Postsecondary Students (BPS:20/22) survey will play in allowing researchers, policymakers, student advocates, and other higher education stakeholders to understand college student persistence and degree completion. In an effort to maximize the impact of the survey in the current environment, we recommend the addition of key questions pertaining to students' access to technology. By adding these questions to the BPS field test, survey questions can be tested and validated in advance of the BPS:20/22 survey wave and modified as needed to reflect student's perspectives and interpretation.

Student access to reliable and quality internet and web-enabled devices is always a critical component of student success. But this access is more important now than ever, as the COVID-19 pandemic has increased substantially the number of colleges and universities using online instructional methods. Many students are now primarily or exclusively accessing their courses remotely, through devices such as laptops or tablets, or even cell phones. Understanding the extent to which students have consistent and reliable access to devices and internet is necessary to assess their ability to fully participate in their education. This is especially true for low-income students from both urban and rural areas, where access to reliable, high-speed broadband is more limited. Similarly, anecdotal reports suggest that many students struggle to find adequate study spaces in their homes where they can complete class sessions, course assignments, and other work without interruptions or distractions. Understanding the full extent of this problem—and which students are most affected—is crucial.

In this time of crisis and over the course of the eventual recovery, the BPS:20/22 will be an essential resource for researchers and policymakers to understand the impacts of the widespread shift to online instruction. Specifically, the addition of questions on the following topics will allow postsecondary stakeholders to better understand the needs of today's students related to access to technology:

- Availability of devices (e.g., computers, laptops, tablets) and whether these devices are shared within households;
- Availability of hardware and software in order to access and participate in online instruction;
- Access to reliable internet within households; and
- Access to adequate workspaces in students' homes which can be used to complete coursework or other assignments free of interruption or distraction.

The addition of these questions will fill the notable gap in publicly available data on college student access to technology and will prove critical to understanding how students are impacted by the educational upheaval caused by the COVID-19 pandemic and beyond. PostsecData strongly supports the collection of this critical information and offers the following recommendations:

- Add plain language questions to the field test to measure students' access to web-enabled devices and sufficiency of internet connection speeds.
- For those who complete the field test online, measure students' web speeds as they complete the survey to add quantitative measures of connectivity.

These proposed changes are described in more detail below, including several potential questions to incorporate into the field test.

Add plain language questions to the field test to measure students' access to web-enabled devices and sufficiency of internet connection speeds.

Data collection on students' access to technology essentials can be complicated due to the multi-faceted nature of digital demands—that is, students must have both consistent access to one or more web-enabled devices and a reliable connection with sufficient speed. PostsecData recommends the addition of the following questions to assess whether students' current tools are adequate for their course needs. The questions should be written in plain language and avoid technical specifications in order to facilitate accuracy, while employing skip logic wherever possible to minimize time burden on survey participants.

1) *Where do you primarily access online course content?*

- At my current residence (e.g. on-campus housing or dormitories, off-campus housing, or with family)
- A school library or other building on my school's physical campus
- At a non-university library or other public space
- At a friend or family member's home, separate from my current residence
- None of these, another location

2) *Where you currently live, do you have an internet connection that is fast and reliable enough to access your school's course content (including streaming or recorded lectures, readings, discussion forums, etc.)?*

- Yes, I can always access course content or experience only occasional issues
- No, I can connect to course content, but it is slow, unreliable, or difficult to access
- No, I cannot access the majority of course content with my connection
- No, I temporarily do not have an internet connection
- No, I do not have an internet connection

- 3) *[If (a), (b), or (c), else skip to question 4] How much of a financial burden do internet costs place on you?*
- a) Very high
 - b) Somewhat high
 - c) Somewhat low
 - d) Very low
 - e) Not applicable
- 4) *Which of the following internet-enabled devices, if any, do you primarily use to complete your coursework?*
- a) A laptop or desktop computer
 - b) A tablet
 - c) A mobile, or cellular device
 - d) I do not have access to such a device
- 5) *[If (a), (b or (c), else skip to question 8] Are you able to consistently use [your primary device] to access course content and to complete class assignments?*
- a) Always, I am the only person in my household who uses this device
 - b) Most of the time, but I share [this device] with other members of my household
 - c) Sometimes, but [this device] is shared with other members of my household and I cannot always use it when I need to
 - d) Rarely, because [this device] is shared with other members of my household I often cannot use it when I need to
- 6) *Does [your primary device] have all necessary hardware (e.g. video and/or microphones or other physical components) for you to participate fully in coursework and complete your assignments?*
- a) Yes
 - b) No, [this device] does not have all of the necessary hardware
- 7) *Do [your primary device] have access to all necessary software (e.g. word processing and presentation software, or other software needed for your program of study) for you to participate fully in coursework and complete your assignments?*
- a) Yes
 - b) No, [this device] does not have access to certain software that is required for my coursework
- 8) *Where you currently live, do you have access to a dedicated physical space in which you can consistently complete coursework and assignments?*
- a) Yes
 - b) No
- 9) *[If (a), else end module] How frequently are you interrupted by other members of your household while in [this space]?*

- a) Often
- b) Sometimes
- c) Rarely
- d) Never

For those who complete the field test online, measure students' web speeds as they complete the survey to add quantitative measures of connectivity.

Because it is often difficult for individuals to accurately report connection speeds, PostsecData does not recommend adding language regarding technical specifications to the student survey. However, we do encourage BPS to measure student's internet connection speeds while they take the survey, as well as collect information on their physical location. This would provide a quantitative measure of students' internet sufficiency to contextualize the qualitative responses to the questions above.

PostsecData recognizes the unprecedented time in which we are living—the full impact of COVID-19 on postsecondary education is still unknown, and it is critical that the field use the tools and resources at-hand to gather data on student needs and enact evidence-based policies to best support them amidst the current public health and economic crisis. Responses to BPS:20/22 will be an invaluable resource as the field seeks to understand the near- and long-term impacts of the COVID-19 pandemic, specifically as postsecondary institutions increasingly rely on distance and online education during periods of campus closures and restrictions.

The undersigned members and partners of PostsecData encourage the Department to adopt these recommendations around student access to technology as they finalize the field test for BPS:20/22. If you have any questions, please contact Mamie Voight, vice president of policy research at the Institution for Higher Education Policy (mvoight@ihep.org or 202-587-4967).

Sincerely,

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American Federation of Teachers
AMT - The Association For Manufacturing Technology
Clearinghouse on Women's Issues
Dallas College
Feminist Majority Foundation
Future of Privacy Forum
Georgetown University Center on Education and the Workforce
Higher Learning Advocates
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manufacturers education and training alliance
NASPA - Student Affairs Administrators in Higher Education
National Center for Learning Disabilities
National College Attainment Network
National Consumer Law Center (on behalf of its low-income clients)
National Skills Coalition

National Urban League
NCHEMS
New America Higher Education Program
Ohio State University (retired)
Ohio Workforce Coalition
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