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

December 21, 2020

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

To Whom It May Concern:

This letter is submitted on behalf of the 14 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

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 that vein, we appreciate BPS:20/22 incorporation of several questions [we previously recommended](#) into the field test pertaining to students' access to technology needed to navigate higher education in this unprecedented time.

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, and these new questions will provide valuable information about whether and how students navigated these transitions.

These questions will enable policymakers and other stakeholders to understand the extent to which students have consistent and reliable access to the devices and internet connections necessary to fully participate in their education. This is particularly important for low-income students from both urban and rural areas, where access to reliable, high-speed broadband is more limited. Likewise, the addition of questions pertaining to students' ability to find adequate study spaces in their homes where they can complete class sessions, course assignments, and other work without interruptions or distractions will allow more precise information beyond anecdotal reports.

Specifically, questions B22FONLACCES, B22FACSQ11, B22FINTPROB, B22FINTFINAN, B22FDEVICE, B22FDEVSHAR, B22FDEVUSE, B22FDEVHRDSFT, and B22FDISTRACT will provide important information about the extent to which students struggle with technological barriers in attempting to transition to online coursework, as well as which students are most affected by these shifts. In addition, we appreciate the addition of B22FDISACCOM which will help stakeholders understand access to technological supports needed for students with disabilities.

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. 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.

The undersigned members and partners of PostsecData thank the Department for adopting these items around student access to technology into the field test for BPS:20/22. If you have any questions, please contact Mamie Voight, senior vice president of research and policy at the Institute for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

AccuRounds  
Eastern Carolina Workforce Development Board, Inc.  
Future of Privacy Forum  
Higher Learning Advocates  
Institute for Higher Education Policy  
Metal - Manufacturers Education & Training Alliance  
National Association for College Admission Counseling  
National Center for Higher Education Management Systems  
New America Higher Education Program  
NIRSA: Leaders in Collegiate Recreation  
Optimax Systems, Inc.  
Postsecondary Analytics  
Student Veterans of America  
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