



October 27, 2023

U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Submitted electronically via: regulations.gov

Re: Comment Request; 2023-24 National Postsecondary Student Aid Study (NPSAS:24) Full-Scale Study-Student Data Collection and Student Records

To whom it may concern,

Student Veterans of America (SVA) submits this comment in response to the Department of Education's (hereinafter "the Department") request for comment on its proposed 2023-24 National Postsecondary Student Aid Study. This comment focuses exclusively on the importance of disaggregating data on military-affiliated students by beneficiary type.

Established in 2008, SVA is a national nonprofit founded to empower student veterans as they transition to civilian life by providing them with the resources, network support, and advocacy needed to succeed in higher education and beyond. With chapters throughout the country and overseas, SVA establishes a lifelong commitment to each student's success, from campus life to employment, through local leadership workshops, national conferences, and top-tier employer relations. As the largest chapter-based student organization in America, we are a force and voice for the interests of veterans in higher education, and SVA places the student veteran at the top of our organizational pyramid.

Data Disaggregation Among Military-Affiliated Students

The National Postsecondary Student Aid Study (NPSAS) provides critical insights into the state of higher education and how it is serving learners of all different backgrounds, including military-affiliated students. SVA appreciates the Department's efforts to carry out this essential study. We comment below on the importance of disaggregating data on military-connected students.

SVA is grateful that NPSAS seeks to incorporate data on students who receive federal veterans education benefits. However, the lack of further disaggregation among those receiving these benefits limits the ability of the federal government and other stakeholders to gain useful insights into their higher education experiences. The study indicates it identifies those who receive federal veterans education benefits by running an administrative data match with the Veterans' Benefits Administration (VBA), but that data includes all beneficiaries including current servicemembers, veterans, dependents, and survivors. This makes it nearly impossible to glean insights into any one of these cohorts specifically. This is problematic because these different groups' experiences can vary greatly. This is no small issue. In 2022, dependents and survivors made up more than 20 percent of all VA education



beneficiaries, and for the Post-9/11 GI Bill—the most popular education benefit at VA—non-veterans accounted for more than a quarter of the program's total beneficiaries.¹

This issue is easily remedied. VBA already disaggregates education benefit data by beneficiary type.² We recommend that ED simply incorporate this disaggregation into the NPSAS design and methodology. ED currently disaggregates by subcategory for institution type, race and ethnicity, and gender, among others. It is critical that the Department do the same for military learners if we are to glean useful insights about their higher education experiences.

We also strongly encourage the Department to continue exploring ways to fill gaps in the current data on military-affiliated students. Large numbers of veterans are excluded from current data sets because they are often identified solely based on use of benefits. Many veterans transfer their benefits, have exhausted their benefits, or may otherwise not have access to or be using their education benefits. It is imperative that research accounts for these students in addition to their benefit-using peers.

We thank the Department for its commitment to student veterans in higher education, and we appreciate its attention to this comment. If you have any questions, please feel free to contact Justin Hauschild directly by phone at 202-223-4710 or by email at justin.hauschild@studentveterans.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Hauschild", written in a cursive style.

Justin Hauschild
Policy Counsel
Student Veterans of America

¹ U.S. DEPARTMENT OF VETERANS AFFAIRS, VETERANS BENEFIT ADMINISTRATION, ANNUAL BENEFITS REPORT FISCAL YEAR 2022 REPORT 154,159 (2023), *available at* <https://www.benefits.va.gov/REPORTS/abr/docs/2022-abr.pdf>.

² See *generally* U.S. DEPARTMENT OF VETERANS AFFAIRS, VETERANS BENEFIT ADMINISTRATION, ANNUAL BENEFITS REPORT FISCAL YEAR 2022 REPORT 154-159 (2023), *available at* <https://www.benefits.va.gov/REPORTS/abr/docs/2022-abr.pdf>.