



October 30, 2023

Stephanie Valentine

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Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.

RE: Docket No.: ED-2023-SCC-0176

Submitted via federalregister.gov

Dear Ms. Valentine,

On behalf of the National Center for Learning Disabilities (NCLD), which works to improve the lives of individuals with learning disabilities, we appreciate the opportunity to provide comments on the 2023-24 National Postsecondary Student Aid Survey (NPSAS:24) Full-Scale Study-Student Data Collection and Student Records.

## **I. Overall Response**

NCLD has concerns about the way in which federal surveys, including NPSAS: 24, identifies individuals who have a disability are significantly under-identifying individuals with a specific learning disability. The term “specific learning disability” means a disorder in 1 or more of the basic psychological processes involved in understanding or in using language, spoken or written, which disorder may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations<sup>1</sup>.

In K-12 education, 2.3 million students, or approximately **5%** of all students in public schools, are identified as having a specific learning disability<sup>2</sup>. In NPSAS:20, only **0.74%** of students identified having a “specific learning disability or dyslexia” as the main type of impairment. NCLD recognizes that the differences between Child Find provisions in the Individuals With Disabilities Education Act and self-disclosure in a postsecondary environment and on a survey will explain some of the discrepancy between these data points, as well as the recognition that some students do not pursue a postsecondary education, but it does not explain all of it. As another comparison, the High School Longitudinal Study of 2009 showed that 3.3% of students enrolled in a 4-year institution and 4.5% of students in a 2-year institution identified as “ever having a learning disability.” For these reasons, NCLD is concerned that the 0.74% of students in the NPSAS:20 survey is a significant under-representation of those with a specific learning disability.

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<sup>1</sup>Individuals with Disabilities Education Act (20 U.S.C. § 1400, et.)

<sup>2</sup>Individuals with Disabilities Education Act Section 618 Data, 2020-21.

In NPSAS:24, as well as for future NCES surveys, NCLD recommends that the federal government address these data quality issues by conducting audits and field tests with other screening items to determine why there is significant underrepresentation of individuals with specific learning disabilities on the surveys compared to prevalence rates in K-12 and in other literature. Under-representation of people with disabilities, a protected class under civil rights laws, impacts the validity of the findings and has implications for being able to make evidence-based policy and practice decisions.

## **II. Specific Recommendations**

We offer the following recommendations to improve NPSAS:24.

### **Recommendation 1: Maintain inclusion of N24FHSLSD44 and N24FHSLSD45.**

NCLD strongly supports the inclusion of N24FHSLSD44 and N24FHSLSD45, an addition to NPSAS:24 described in Table 1 of Appendix K, Student Survey Instrument. These questions seek to determine if a student disclosed their disability at their institution of higher education and received accommodations from the institution.

**Rationale:** Disclosing a disability and requesting reasonable accommodations at an institution of higher education is not required, and data collected about students who do so is beneficial to a number of stakeholders, including students and families, colleges and universities, and even high school or Vocational Rehabilitation transition personnel who, in accordance to IDEA and WIOA, provide post-high school transition services to students. As cited in Appendix K, these questions were utilized in the High School Longitudinal Study (HSLs) of 2009 and insightful findings were published in a [2022 NCES brief](#). However, it is important that updated data on this is collected on this information.

### **Recommendation 2: Remove “special need” from N24FHSLSD44 and N24FHSLSD45.**

*N24FHSLSD44: [{If T\_CURENR= 1} Have you informed {else} Did you inform] [NPSAS institution] that you have a disability ~~or special need~~?*

*N24FHSLSD45: [{If currently attending NPSAS institution} Have you received {else} Did you receive] accommodations or services for your disability ~~or special need~~ from [NPSAS institution], such as early registration, test taking accommodations, or counseling?*

**Rationale:** The term “special need” is outdated<sup>3</sup> and disability is sufficient here.

**Recommendation 3: Remove “significantly” from N24FDISABLE and its Help Text.**

*N24FDISABLE: Do you have any conditions or disabilities that **significantly** affect your experience as a student at [NPSAS institution], including how you learn or perform academically, [{if N24BONLINEP = 0} interact with others, or access campus {else} or interact with others]?*

1 = Yes

0 = No

***Help Text:***

*Answer Yes if you have any conditions or disabilities that **significantly** affect your experience as a student, including how you learn or perform academically, interact with others, or access the campus.*

**Rationale:** The term “significantly” is subjective and might result in some students with a disability selecting no, resulting in under-representation in this survey. Moreover, it is not used in the definition of a disability under Section 504 of the Rehabilitation Act or the Americans with Disabilities Act. We have concerns that this question, as worded, will under-represent students with disabilities in the NPSAS:24 survey.

**Recommendation 4: Amend Help Text for N24FACS17A to better identify individuals with learning disabilities and ADHD.**

*N24FACS17A: Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions?*

1 = Yes

0 = No

***Help Text:***

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<sup>3</sup> See AUCD’s resource: [https://www.aucd.org/docs/add/sa\\_summits/Language%20Doc.pdf](https://www.aucd.org/docs/add/sa_summits/Language%20Doc.pdf)

Answer **Yes** if it is sometimes or always ~~very~~ difficult ~~or impossible~~ to remember or concentrate, if you forget to eat, forget to take medication, if you have Alzheimer's disease or dementia, or if you have a ~~serious~~ specific learning disability or attention-deficit/hyperactivity disorder (ADHD) .

This question is in accordance with the U.S. Department of Health and Human Services (HHS) [data collection standards for identifying disability status](#). Your responses will not affect any aid or other benefits that you may receive. Your responses, combined with any student record information, may be used for statistical purposes, and will not be disclosed, or used, in personally identifiable forms for any other purpose, except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

**Rationale:** Some elements of the help text are subjective and may fail to identify individuals who have a specific learning disability when responding to item N24FACS17A. Moreover, the term specific learning disability is used in N24FMAIN, so the help text should align with that.

**Recommendation 5: Amend the text for the specific learning disability option and the Help Text for N24FMAIN to better align with N24FDISABLE.**

*N24FMAIN: Which of the following conditions or impairments have the most significant impact on your daily activities? (Please check all that apply.)*

- ☐ Hearing impairment (e.g., deaf or hard of hearing)
- ☐ Blindness or visual impairment that cannot be corrected by wearing glasses
- ☐ Speech or language impairment
- ☐ Orthopedic or mobility impairment
- ☐ Specific learning disability ~~or~~ (e.g., dyslexia, **dyscalculia, dysgraphia**)
- ☐ Attention-deficit/hyperactivity disorder (ADHD)
- ☐ Autism spectrum
- ☐ Health impairment or problem (e.g., asthma, diabetes, Chron's disease, etc.)
- ☐ Mental, emotional, or psychiatric condition (e.g., depression, post-traumatic stress disorder [PTSD], schizophrenia, etc.)
- ☐ Intellectual disability
- ☐ Brain injury
- ☐ Other condition or impairment

**Help Text:**

*From the options provided, select which conditions or impairments have the most significant*

effect on your daily activities, *including how you learn or perform academically, interact with others, or access campus.*

**Rationale:** Dyslexia<sup>4</sup> is a type of specific learning disability so the usage of “or” does not accurately reflect this categorization. In addition to dyslexia, there are other specific learning disabilities such as dyscalculia, which impacts mathematics and numeracy, dysgraphia, which impacts writing, amongst others.

The goal of NPSAS and these questions is to understand the impact of a student’s conditions or impairments on their educational experiences. It is clear from the N24FDISABLE that this is the goal, but not providing more context for “daily activities” for this item could impact which conditions or impairments an individual self-selects.

NCLD appreciates the opportunity to provide comments on NPSAS:24 and improve federal data collection on postsecondary students with disabilities. If we can provide additional information, please contact me at [lkubatzky@ncld.org](mailto:lkubatzky@ncld.org).

Sincerely,



Lindsay Kubatzky  
Director of Policy and Advocacy  
National Center for Learning Disabilities

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<sup>4</sup> American Psychological Association. (2022). Neurodevelopmental Disorders. In Diagnostic And Statistical Manual Of Mental Disorders : DSM-5-TR (5th Edition, Text Revision)