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AHEAD Comments and Recommendations on 2020/25 Beginning Postsecondary Students Full-Scale Study

Introduction

The Association on Higher Education And Disability (AHEAD) welcomes the US Department of Education's opportunity to comment on the 2020/25 Beginning Postsecondary Students (BPS:20/25) Full-Scale Study. As the premier professional membership association for individuals committed to equity for persons with disabilities in higher education, AHEAD strongly supports the administration of the BPS Study and offers recommendations, such as modifying disability and health condition-related questions and language, that would equip individuals with the necessary tools to provide support for all students, including students with disabilities. We thank you for seeking input and hope you consider the following ideas for the implementation and development of the BPS Study.

Comments and Recommendations

Continuation of the BPS Study

While the Department primarily seeks comments and recommendations addressing the 2020/25 version of the BPS Study, **AHEAD highly encourages the continuation of the BPS Study through additional cohorts in 2025/30 and 2030/35.** The BPS Study provides valuable information, such as the persistence and graduation rates of students with disabilities, and allows organizations such as ours to learn how disability policies and practices have an impact over time.

Modifying disability and health-related questions in the BPS Study

For future iterations of the BPS Study, **AHEAD strongly urges the Department to modify questions pertaining to disability and health conditions so that they reflect an updated understanding of how college students and disability service professionals typically conceptualize disability.** Updated questions and language will allow for more input and clear information. For example, the following line of questioning within the BPS Study can be improved to reflect updated conceptualizations of disability:

- Many disability questions ask if a condition is "serious," leading many students to not self-report because they do not believe their condition or disability is "serious." This is an ongoing problem in getting students to use disability services, as many are led to believe their condition may not require such services.
- Questions addressing a student's type of disability should provide clear details and categories. For example, "developmental disability" could account for autism and other intellectual disabilities, while "depression" should be listed as a "mental, emotional, and psychiatric condition."
- Questions addressing students' disabilities should allow students to pick up to three categories and denote multiple disabilities. As an example, one individual may live with dyslexia, depression, and ADHD, and therefore, the option to report on all of these should be accounted for.
- Terminology in the BPS Study should reflect the terminology used by postsecondary disability professionals, people with disabilities, and the ADA, eliminating language similar to special education categories or terms. Examples of terminology needing updates include:

- Using “Deaf or hard-of-hearing” instead of “Hearing impairment” (an offensive term to culturally Deaf people using ASL)
- Describing a disability as a “Physical, mental, or emotional” condition affecting “concentrating, remembering, or making decisions,” instead of using the ADA definition of disability
- Changing “Health impairment or problem” to “chronic illness or condition (e.g., eating disorder, AIDS or HIV, diabetes)” (or something similar)
- Denoting “autism” as its category
- Changing “developmental disability” to “intellectual disability (e.g., Down syndrome, Fetal Alcohol Syndrome)”

Questions addressing student services must be expanded

AHEAD urges the Department to include expanded questioning on disability services that students use. As an example, questions addressing student services should account for counseling services, TRIO programs, and disability or accessibility services. The inclusion of this information will account for more accurate information and allow colleges and universities to observe how their current practices are serving students with disabilities.

Inclusion of all postsecondary programs in College Navigator

The College Navigator tool from the National Center for Education Statistics allows students, parents, and high school counselors to obtain information on colleges and universities. To allow students with disabilities to make informed decisions about higher education programs, **AHEAD recommends including students in Career and Technical Education (CTE) programs, which are currently included in College Navigator as a postsecondary option. We also recommend including students in dual enrollment programs and inclusive higher education programs.**

Expanded degree attainment information within the BPS Study

To provide more clear information on how the higher education community is serving students with disabilities, **AHEAD recommends the inclusion of additional categories of certification and licensure in terms of degree attainment information.** The current iteration of the BPS Study accounts for an Associate’s degree as the lowest category of degree an individual can access. However, certifications and licensure should be included in degree attainment questions as they can provide additional insight and information on how students with disabilities are transitioning from higher education into the workforce.

Conclusion

In conclusion, AHEAD appreciates the Department of Education’s commitment to ensuring the Beginning Postsecondary Students Full-Scale Study captures meaningful data that can improve support for all students, particularly those with disabilities. By refining disability and health condition-related questions and language, the BPS Study can better reflect the experiences and needs of this diverse population. AHEAD remains dedicated to advancing equity in higher education and is eager to collaborate further to enhance the BPS Study’s impact. Thank you for considering our recommendations, and we look forward to seeing how these enhancements contribute to a more inclusive educational landscape.

About AHEAD

The Association on Higher Education And Disability (AHEAD) has operated for over 45 years bringing unparalleled professional development, leadership, and advocacy. AHEAD's reach includes:

- *Over 6,000 individual professional members*
- *Over 2,200 higher education institutions*
- *All 50 states in the United States*

Informed through its diverse membership and expertise, AHEAD leads the national dialogue around welcoming post-secondary experiences for students with disabilities through:

- *Delivering exceptional professional development opportunities through conferences, workshops, distance learning, publications, networking, and consultation*
- *Sharing emerging issues relevant to disability, access, and higher education in the legislative and regulatory spheres*
- *Disseminating data, promoting research, and furthering evidence-based practice*

For more information on our organization, programming, goals, and achievements, please visit us at ahead.org.