

RE: **ED-2024-SCC-0136** Comment Request;

2020/25 Beginning Postsecondary Students (BPS:20/25) Full Scale Study

“[U]nderstand[ing] how financial aid influences persistence and completion” of postsecondary education by students is self explanatory: persistence and completion depends on the ability to enter education, and the financial aid provides for this ability. The reach and the cost of the proposed study is disproportionate to its (implied but not disclosed) purpose.

The proposed study years should be reconsidered: Department's proposed years for the study, 2020-2025, represent 3 years of COVID pandemic nationwide emergency (where students' education efforts had to take a back seat to restrictions, mandates, and loss of income) and the following 2 years of families' attempting to heal financially and socially. Studying the proposed period is not representative of individuals' priorities and efforts now, outside emergency time, and thus federal funding should not be invested in it.

Any collection of information from the students (including through surveys) with regard to this study should be clearly marked as optional.

Department needs to make a disclosure as to whether the student provided information would be added to their Department held record or it would be submitted anonymously. Would there be an effort made to identify anonymous submissions, including through handwriting recognition or school made markings?

The burden to students should be assessed and published for public comment.

“[A] survey and administrative data” collected (in 2025) from students would be for the events of 5 years ago (2020). The Department has to disclose how it plans to account for false, forgotten, or withheld data provided by students as well how would same data be collected from non completers who are no longer a part of education system. The data from the latter is especially valuable because it reveals the difficulties and circumstances directly affecting “persistence and completion” of postsecondary education by students.

Also, stifling college and Department policies, as well as both personal and poor social circumstances may make “persistence and completion” impossible. The study would not be able to capture this, making its conclusions deficient.

The proposed study would mislead researchers and policymakers, allow correlation to be passed as causation, and result in more federal funds to be mis allocated.

This proposal should not be approved.