

September 7, 2017

Kate Mullan
Acting Director, Information Collection Clearance Division
Office of the Chief Privacy Officer
Office of Management
U.S. Department of Education

**RE: CGS Response to Comment Request; 2017-18 National Postsecondary
Student Aid Study Administrative Collection (NPSAS:18-AC)**

Dear Ms. Mullan,

On behalf of the Council of Graduate Schools (CGS), I appreciate this opportunity to provide comments and feedback to the 2017-18 National Postsecondary Student Aid Study Administrative Collection (NPSAS:18-AC, Agency Docket Number ED-2017-ICCD-0102). CGS membership includes roughly 500 universities in the United States that annually award the majority of U.S. doctoral and master's degrees each year.

NPSAS is an important data tool for the higher education community that offers insights into student financial support at U.S. postsecondary institutions. CGS applauds the Agency's effort to expand the NPSAS series by including the administrative data collection. This proposed expansion will increase the frequency of NPSAS data releases and will allow for more timely and frequent analyses of student financial support patterns. CGS is particularly pleased that the Agency's proposed sampling strategy creates several sampling strata for different segments of graduate and professional students. This will allow researchers and analysts to perform nuanced examinations of student financial support that account for differences by degree objectives between master's, doctoral, and professional students, and some disciplinary differences.

Funds disbursed through the FAFSA process may be the only or one of many sources from which Master's and doctoral students draw their financial support. The proposed administrative collection has the potential to offer more frequent snapshots of student borrowing toward graduate and professional education. However, it is not clear from the supporting documents how other forms of financial support, such as employer paid tuition assistance, graduate fellowships, research assistantships, and traineeships, will be captured in this proposed data collection effort. The Agency's Data File Documentation for NPSAS:12 notes a 52% match of survey graduate students to the 2011-12 CPS, which is most likely attributable to the fact that the FAFSA is not required for graduate and professional students, unless they are applying for federal loans.

CGS believes that the proposed administrative collection will add value to the NPSAS series by beginning to differentiate graduate and professional student financial support data. As the only national organization that represents master's and doctoral education

A F F I L I A T E S

Conference
of Southern
Graduate Schools

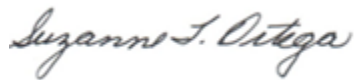
Northeastern
Association
of Graduate Schools

Midwestern
Association
of Graduate Schools

Western
Association
of Graduate Schools

in the United States, CGS is prepared to be a resource for the Agency when data tools that better inform the graduate education community are considered. Specifically, we would welcome the opportunity to be a part of future NPSAS technical review panels (TRPs), as CGS has been represented in TRPs for other NCES data collection efforts, including the Baccalaureate & Beyond Longitudinal Study, in the past. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne T. Ortega".

Suzanne T. Ortega
President

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