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U.S. Department of Education

400 Maryland Avenue, SW

Washington, D.C. 20202

Re: Docket ED-2022–SCC–0082

This letter is submitted on behalf of the 11 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to a call for comments on the Demographic Survey portion of the Free Application for Federal Student Aid (FAFSA). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. This letter offers several recommendations for how ED can best capture race/ethnicity and gender information using the Demographic Survey in the upcoming 2023-24 aid year, in order to pilot test question wording for use on the main form in future years.

Along with suggestions on how FAFSA can best structure questions pertaining to applicants' race/ethnicity and gender, this letter also includes recommendations for revisions to the main form regarding students' caregiver status and previous postsecondary experience. Carefully implementing these changes is critical to maintaining a streamlined and inclusive aid application for students and to identifying and addressing inequities in access to and affordability of higher education.

### **The Demographic Survey Should Include the following Categories for Race/Ethnicity and Revise the Proposed Gender Categories**

#### *Race/Ethnicity*

While the FAFSA does not currently include a question on race/ethnicity, new requirements in the [Consolidated Appropriations Act of 2021](#) require the inclusion of these questions, starting in aid year 2024-25. For the 2023-24 aid year, ED proposed the use of an optional demographic survey to pilot test question wording and gain preliminary data on applicants' race/ethnicity and gender. To maintain cohesion between data sources and disaggregate to a level sufficient to examine variations and inequities within larger subgroups (e.g., within the larger Asian American Pacific Islander group), PostsecData suggests aligning both the proposed demographic survey and any long-term changes to the FAFSA form with the data standards used by the [U.S. Census Bureau in administering the American Community Survey](#). PostsecData commends ED for the currently proposed options for the race and ethnicity portion of the survey. Also, we encourage the

addition of several ethnicity categories including Guamanian or Chamorro, Samoan, Central American, and South American, which is in line with the U.S. Department of Health and Human Services [recommended standards](#).

Further, in pursuit of a streamlined application, we suggest using skip logic to allow some users to skip portions of questions that are not applicable. This model allows applicants to first select the overarching categories and then, depending on what is selected, they may be prompted with a follow up for a deeper disaggregation.

PostsecData recommends that ED adopt the following structure in assessing FAFSA-filers' race and ethnicity:

What is the applicant's race? Select all that apply.

- White
- Black or African American
- American Indian or Alaska Native
- Asian (*if selected the applicant would be diverted to a new page with the following choices*)
  - Chinese
  - Vietnamese
  - Filipino
  - Korean
  - Asian Indian
  - Japanese
  - Asian, not specified above
- Native Hawaiian/ Pacific Islander (*if selected the applicant would be diverted to a new page with the following choices*)
  - Native Hawaiian
  - Guamanian or Chamorro
  - Samoan
  - Pacific Islander, not specified above
- Another race

PostsecData also recommends that the FAFSA ask about ethnicity as a separate question, aligning with the Census ACS standard, [government data sources, and best practices](#).

Is the applicant of Hispanic, Latino, or Spanish origin?

- No, not of Hispanic, Latino, or Spanish origin
- Yes, Hispanic, Latino, or Spanish Origin (*if selected the applicant would be diverted to a new page with the following choices*)
  - (Second screen):
    - Spanish descent
    - Mexican, Mexican American, or Chicano descent
    - Cuban descent
    - Puerto Rican descent

- Central American descent
- South American descent
- Another Hispanic, Latino, or Spanish origin ethnicity

### *Gender*

With the removal of the question on selective service, ED also removed the question about the sex or gender of applicants.<sup>1</sup> As stated in a previous [letter](#), we strongly suggested restoring the question that asks about legal sex to the main portion of the FAFSA form, rather than including this in the optional demographic survey, to ensure continuity of this information. However, we support ED's proposed wording of the gender question on this survey, and we appreciate the inclusion of "nonbinary" categories to reflect students' gender more accurately. We suggest deleting the option to opt out of answering this question and instead include "Another Gender" as a possible answer. If many students decline to answer, the resulting data quality could be limited, while adding the option to select "Another Gender" will help to assess how best to address this measurement challenge in future years.

## **Add Questions to the FAFSA Form on Student Caregivers and Transfer Pathways**

### *Caregiving Status*

Currently, the FAFSA form queries applicants about whether they have children and/or other dependents. To fully understand the caregiving/parental status of students, we suggest a sub-question that gathers information on the number of dependents and whether those dependents are 17 years old or younger. During the COVID-19 pandemic, more of the population had to take over caregiving duties, [increasing the caregiving burden](#). There has also been an increase in the number of dependents per [household](#). In many cases, caregiving duties now include adult children, elderly parents, or other non-traditional circumstances. Adding this sub-question will help to fully capture the economic situation of FAFSA applicants and ensure that financial aid is awarded effectively and equitably based on the entirety of a students' circumstances.

### *Educational History*

At present, the FAFSA includes a question on prior bachelor's degrees and general educational history. We suggest enhancing the collection of data on educational history by including options for previous occupational and professional certificates and associate degrees. These additional options—which do not require an additional question—would help to identify students with different educational pathways and prior experiences. This information, for example, could be useful in identifying transfer students and understanding complex patterns of enrollment and credential receipt.

Further, the form should include a question about the intention to matriculate from a two-year college into a four-year college. This data will help to identify student educational pathways, as

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<sup>1</sup>Section 483 of the Consolidation Acts

many students do not follow a linear postsecondary path. Data about intention to transfer would help contextualize transfer rates among those who intend to transfer versus all students who enroll, allowing the results to better reflect institutional outcomes.

The undersigned thank ED for efforts to improve the utility of FAFSA data while reducing the burden it places on students and their families. We urge ED to continue the path to better, more complete data that would allow institutions and policymakers to implement data-driven strategies to address inequities in access to and affordability of higher education.

If you have any questions, please contact Mamie Voight, President at the Institute for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org)).

Sincerely,

AccuRounds  
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Guild Education  
Higher Learning Advocates  
Institute for Higher Education Policy  
NCHEMS  
Nexus Research and Policy center  
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The Institute for College Access & Success (TICAS)