To: Kun Mullan, PRA Coordinator, Strategic Collections and Clearance, Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development

From: Kim Cook, Chief Executive Officer, National College Attainment Network

Date: August 12, 2022

Re: Comment Request; Free Application for Federal Student Aid (FAFSA) Demographic Survey [ED-2022-SCC-0082]

On behalf of the National College Attainment Network, we would like to provide the following comment on the Demographic Survey to be included in the 2023-24 FAFSA and to inform its full implementation for the 2024-2025 FAFSA.

The National College Attainment Network (NCAN) is a membership organization of 540 college access organizations access the country. Our members work directly with two million students each year to support them on their journey to and through college. Over NCAN’s 27-year history, we have helped many millions of students through the federal financial aid process. We have seen how the complexity of the FAFSA can dissuade students from completing it, and we have advocated for policies, strategies, and practices that simplify the process and increase the FAFSA completion rate, a leading indicator of college enrollment.

We appreciate the opportunity to comment on the Demographic Survey proposed by Federal Student Aid (FSA). This instrument will collect important information that will help policymakers, researchers, and advocates to better understand trends and disparities in federal funding for postsecondary education. But in order to gather the most accurate and complete data possible, it is critical that the questions be worded neutrally and sensitively, informed by the politicized context surrounding issues of race and gender today.

In order to respond to this request for comment we surveyed our members and consulted with our partners who work with students to complete the FAFSA. Their feedback was consistent. Many expressed concern that applicants would not answer the questions out of fear that their answers would adversely impact them. As a result, we respectfully request that FSA make the following changes, which are aimed at maximizing the likelihood of students completing the form, and FSA gathering the most comprehensive data picture possible.

1. **Remove the transgender question.** Universally, our members expressed serious concern about the question: “Are you transgender?” This question garnered the most feedback from our members and partners, and universally, they expressed serious reservations about asking the question at all. They predict students who are transgender will feel singled out since the survey does not ask about any other LGBTQ+ identities. Some said students will fear that there will be
repercussions for answering yes due to anti-transgender bills that have been championed in states around the country. Many of our members and partners said asking the question will make students feel “threatened or discriminated against.” Others said students will worry that they won’t be admitted to college or receive financial aid if they respond in the affirmative. While the survey says that the data will not affect financial aid determinations, our members and partners did not think students would accept that on face value. We would further note that The FAFSA Simplification Act (FSA; Title VII, Division FF of P.L. 116-260) does not list “transgender” as a data point to be collected on the FAFSA. It adds only race, sex, and ethnicity. As a result,

- We recommend that the transgender question be dropped from the survey entirely.

2. **Explain that the demographic data will be used for research purposes only.** Throughout the survey, it says that the answers to the survey questions will not affect eligibility for aid. It does not, however, say how the data will be used. Our members anticipate that students would want to know why the questions are being asked and who will have access to the answers. They expect that students will assume that institutions will have access to this information when making decisions about financial aid and college admittance. They also believe that students will be skeptical of the disclaimer and disinclined to answer the questions without a clearer explanation of who will receive the information and how it will be used. Our members also anticipate that students will be concerned that the information will not remain private.

- We recommend adding language to the box at the top of the survey that states clearly that the information collected will be used for research purposes only and will not affect admission decisions, whether a student receives financial aid or how much financial aid a student receives.

- We also recommend that the Department update the Federal Student Aid Data Center to disaggregate the data currently posted there by the categories of race and gender contained in this survey. For research and transparency purposes, this data will be valuable to the general public.

3. **Align the race and ethnicity options with other federal surveys, such as the U.S. Census.** Many of our members were confused by the race and ethnicity questions. They did not understand the distinction between some of the race and ethnicity categories and wondered why some categories were included and others were left out. One respondent said simply, “there must be better models for capturing race and ethnicity.” We understand that it is challenging to strike a balance between offering applicants’ sufficient options that they see their identity reflected in the answers and keeping the options simple and straightforward enough to not add considerably to the length of the survey. As a result, we recommend modeling the questions after other federal surveys, such as the 2020 U.S. Census.

- With respect to ethnicity, this approach offers the following two options: No, not of Hispanic, Latino, or Spanish origin and Yes, Hispanic, Latino, or Spanish Origin. Those who select Yes are invited to select from the following options:
▪ Spanish descent, Mexican, Mexican American, or Chicano descent
▪ Cuban descent
▪ Puerto Rican descent
▪ Central American descent
▪ South American descent
▪ Other Hispanic, Latino, or Spanish origin
  ○ With respect to race, this approach offers the following categories: White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian/Other Pacific Islander, or Other. Those who select Asian are invited to chose from the following options:
    ▪ Chinese
    ▪ Vietnamese
    ▪ Filipino
    ▪ Korean
    ▪ Asian Indian
    ▪ Japanese
    ▪ Other Asian

Those who select Native Hawaiian/Other Pacific Islander are invited to select from the following categories:
  ▪ Native Hawaiian
  ▪ Guamanian or Chamorro
  ▪ Samoan
  ▪ Other Pacific Islander.

4. **Change the response option “Decline to answer” to “Prefer not to answer” throughout the survey.** Several of our members suggested that “Prefer not to answer” or “Do not wish to specify” would be a more neutral, respectful, and inviting way to phrase the option than “Decline to answer.”

On behalf of our members across the country and the students they serve, we hope you will implement these recommendations. Thank you for the opportunity to provide input into this important issue.

For additional information, please contact:

Kim Cook

Chief Executive Officer
National College Attainment Network
cook@ncan.org / (202) 347-4848 x205