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To Whom It May Concern:

I am writing to submit a formal comment to the February 2, 2021 *Federal Register* request for comments (86 FR 8385, pages 8385-8386, document number 2021-02449) regarding the 2021 Survey of Doctorate (SED) Recipients, OMB Control Number: 3145-0019. My comments relate specifically to items (c) in the last paragraph of the notice, which states the NSF is seeking “ways to enhance the quality, use, and clarity of the information on respondents” and (d) “ways to minimize the burden of collection of information.”

I serve as the Vice Provost for Graduate Education at Chapman University, a private mid-sized (10,000 student) institution in California. Related to item (c) in the call for comments, it has come to our attention that the survey options for questions related to gender identity, marital status, parent identification, and other aspects of diversity and inclusion raise issues of concern for respondents due to a lack of clarity and, therefore, possible compromised quality and use of data collected questions.

First, the survey asks respondents if they are male or female, with no option for respondents to choose non-binary identities or “other”. Additionally, in prior publications and on the [NSF webpage found here](#), we have noticed a continued use of the word “sex” rather than “gender” related to the data collection for this question, which is not reflective of including those persons whose biological sex does not conform to their gender identity. Relatedly, the survey permits identification of parents only as “mother/female guardian” or “father/male guardian”.

Secondly, the way in which the marital status options are currently presented is inconsistent across the question’s options. The option “living in a marriage-like relationship” may be interpreted as being reflective of cohabitation rather than marital/relationship status, particularly when persons who choose from the options “married”, “single”, “divorced”, or “widowed” are not asked to identify their living arrangement in relationship to other person(s). If the aim of this question is to identify persons in a long-term relationship similar to marriage, the term “married/partnered” would simplify and remove reference to living arrangement within any of the options.

Additional concerns regarding questions about respondents’ visa status have been raised related to students who may be undocumented, fearing possible identification for deportation through the survey.

Related to item (d) in the call for comments, like most PhD granting institutions ours requires its graduates to participate in the SED as a step in the process of degree conferral, dissertation submission, or diploma release. This is done to minimize the burden on our institution in the collection of the data and to assure that our graduates meet the 90% minimum threshold for participation to maintain survey integrity. An institutional requirement of PhD graduates to participate in the SED will become increasingly difficult for universities like mine to impose when the survey’s content is not consistent with our institutional practices that honor diverse identities. Removal of institutional requirements for SED participation due to a lack of revision of the SED content will increase the

collection burden on Institutional Representatives as described in the *Register* and potentially will lower the current national 92% completion rate cited in the *Register* in the future.

In closing, I would like to suggest that a diversity expert be retained to (1) examine the options on all demographic questions so as to improve the quality, use and clarity of information being asked of respondents so as to remove institutional barriers to requiring student participation, thus minimizing the burden of collection on Institutional Representatives, and (2) in order to provide respondents with greater clarity about the impact of not answering individual questions to which they have concerns, improve the participant instructions on each page/screen to make clear that answers to individual questions are completely voluntary, and failure to provide answers to individual questions does not prevent completion/submission of the survey and issuance of a Certificate of Completion to the respondent.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Roxanne Greitz Miller". The signature is written in a cursive, flowing style.

Roxanne Greitz Miller, Ed.D.
Vice Provost for Graduate Education