Public Comments for ICR 202202-1850-008

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Comments Received :

While I appreciate any forward movement on acknowledging gender identity through NCES data collection, I am concerned about the harm that would continue by requiring colleges to allocate individuals to a binary category and the impact on data validity by having students largely randomly distributed across the data which will impact measuring any equity gaps between men and women. Additionally, there is likely a need for more guidance on the categorization of trans men and trans women specifically; If only the binary options are retained for capturing enrollment/achievement data, I would like to see guidance indicating that trans men be reported with men and trans women reported with women. Lastly, also pertaining to trans men and trans women, since we are able to allocate those individuals to a binary category (hopefully respecting their identities), would that mean we do not include them in the count of 'Another gender'? This would likely result in significantly lower reported numbers in these fields, perhaps underrepresenting the the size of the trans/non-binary population; different colleges could also take different approaches without clearer guidance, with some reporting trans men/women as 'another gender' (with additional discrepancies in which binary category they are reported in) and others not reporting trans men/women as 'another gender' because they are reported in alignment with their gender identity/presentation. Thank you.