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Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

October 16, 2023

Re: Docket No.: ED-2023-SCC-0053

To Whom It May Concern:

This letter is submitted on behalf of the 10 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to a call for comments on the Department of Education (ED)'s proposed 2024-25 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.

The undersigned members strongly support the inclusion of questions about applicants' race, ethnicity, and gender in the revised form. While the FAFSA has not historically included questions on race and ethnicity, the [FAFSA Simplification Act](#) now requires the inclusion of these questions. In addition, the proposed form now correctly provides students with a nonbinary option for gender. 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. Further, we encourage ED to reconsider the use of a separate FAFSA form for incarcerated applicants that is not streamlined to those individuals' needs.

***Race and Ethnicity***

PostsecData strongly supports the proposed options for the race and ethnicity questions included in the draft FAFSA and encourages ED to maintain the level of detail this question structure would provide. We appreciate the thoughtful implementation of proposed race and ethnicity questions for the 2024-25 aid year, which align with [previous recommendations](#) from PostsecData. In addition to asking applicants to indicate whether they identify as White, Black or African American, Asian, American Indian or Alaska Native, and/or Native Hawaiian or Pacific Islander, the proposed FAFSA form allows applicants to identify racial subcategories, such as Chinese, Filipino, Nigerian, and Samoan. In the proposed form, applicants who identify as American Indian or Alaska Native can indicate their enrolled or principal tribe(s). PostsecData also supports the proposed use of a separate question about student ethnicity,

which aligns with existing best practices and standards used in [data collection across other federal agencies](#).

The inclusion of these race and ethnicity questions on the FAFSA is invaluable for research on how different groups of students access, cover costs for, and receive value from postsecondary education. Note that applicants' reported race and ethnicity data will not be used to determine financial aid eligibility or be shared with the schools to which they apply. For research purposes, the detailed question structure in the proposed FAFSA enables disaggregation at a level sufficient to examine variations and inequities within larger subgroups (e.g., disparities within the [larger Asian American and Pacific Islander group](#)).

### ***Gender***

In addition, PostsecData supports ED's proposed wording of the question collecting information about student gender. The inclusion of a "nonbinary" category, in addition to "male" and "female", allows for a more accurate and inclusive reflection of students' gender.

### ***Incarcerated Student Form***

Finally, ED's proposed materials for the 2024-25 FAFSA include a separate form for incarcerated students, which is identical to the standard form. As in our [previous recommendations](#), PostsecData urges ED to provide a separate FAFSA form for incarcerated students only if it is tailored to their experiences and needs. The use of a separate but identical form can contribute to the stigma that many justice-impacted students already face. If it is not possible to provide a separate, tailored form for the 2024-25 FAFSA, incarcerated applicants should be directed to complete the standard form and ED should develop a streamlined version for incarcerated applicants in the future.

The undersigned thank ED for efforts to improve the FAFSA, while reducing the burden it places on students and their families. We urge ED to continue to collect 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 Diane Cheng, Vice President of Research and Policy at the Institute for Higher Education Policy ([dcheng@ihep.org](mailto:dcheng@ihep.org)).

Sincerely,

Institute for Higher Education Policy  
Aspen Institute for College Excellence  
Association for Career and Technical Education  
Georgetown University Center on Education and the Workforce  
Higher Learning Advocates  
Institute for Higher Education Policy (IHEP)  
NCHEMS  
The Education Trust  
The Institute for College Access & Success (TICAS)  
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