



May 30, 2024

Juliana Pearson

PRA Coordinator

Strategic Collections and Clearance, Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development
Department of Education

RE: Early Childhood Longitudinal Study, Kindergarten Class of 2023-24 (ECLS-K:2024) - April 2024 Materials Revision

Docket No.: ED-2023-SCC-0063

Document No: 2024-09312

Dear Ms. Pearson:

I write on behalf of the Southeast Asia Resource Action Center (SEARAC) to comment on the Education Department's April 2024 materials revision of the Early Childhood Longitudinal Study, Kindergarten Class of 2023-24. SEARAC urges the Department to update the race and ethnicity question in the ECLS-K so that it explicitly includes, at a minimum, Cambodian, Hmong, Laotian, and Vietnamese as examples of Asian subgroups, so that the varied educational experiences and unique needs of Southeast Asian American (SEAA) students are made visible in education systems.

Founded in 1979, SEARAC is a national civil rights organization that builds power with diverse communities from Cambodia, Laos, and Vietnam to create a socially just and equitable society. As representatives of the largest refugee community ever resettled in the United States, SEARAC stands together with other refugee communities, communities of color, and social justice movements in pursuit of social equity. For decades, we have advocated at all levels of government for disaggregated race and ethnicity data to ensure that SEAA communities are seen and equitably supported by public policies.

Southeast Asian Americans are members of a diverse Asian American, Native Hawaiian, and Pacific Islander community.

Asian American, Native Hawaiian, and Pacific Islander (AA and NHPI) communities are extremely diverse, with dozens of subgroups falling under the aggregated “Asian” and “Native Hawaiian and Pacific Islander” racial groups. Within the “Asian” major race group, SEARAC considers Southeast Asian American as not only a geographic identity, but also a political identity that comes from the shared experiences of people who came to the U.S. as refugees from Cambodia, Laos, and Vietnam. SEAs now number over 3 million, and the vast majority are refugees, the children of refugees, and their family members. Today, Southeast Asian Americans include:

- Those from Cambodia, including Cham, Khmer, Khmer Loeu;
- Those from Laos, including Hmong, Khmu, Lahu, Lao, Iu Mien, Phutai, Tai Dam, Tai Deng, Tai Lue;
- And those from Viet Nam, including Cham, Hmong, Khmer Kampuchea Krom, Lahu, Iu Mien, Montagnards, Phutai, Tai Dam, Tai Deng, Tai Lue, Vietnamese.

The major race category of “Asian” renders SEAs invisible in public policy and effectively ignores the significant inequities SEAA communities experience in education. Additionally, it impedes our understanding of how our communities use important federal programs.

Cambodian, Hmong, Laotian, and Vietnamese Americans comprise the four largest SEAA groups, and other SEAA groups are highly concentrated in particular areas, such as Iu Mien communities in California and Montagnards in North Carolina. Unfortunately, SEAs and other AA and NHPI communities, policymakers, researchers, and education stakeholders are all limited by the current available data provided by the Department and the Institute for Education Studies that do not disaggregate by detailed Asian and NHPI groups. With a lack of disaggregated data from federal and state education agencies, NHPI and SEAA students have particularly been rendered invisible in educational research and data-driven decisions.

Data disaggregation is one of the most important civil rights issues for AA and NHPIs today and is important in gathering how education disparities impact SEAA children.

For example, In 2014, the Office of Civil Rights (OCR) issued a report that used a national dataset that did not disaggregate beyond “Asian” or “NHPI” categories. OCR concluded that Black students are disproportionately affected by exclusionary discipline, including being suspended and expelled three times more often than White students. However, the difference in the discipline gap between students under the aggregated “Asian” umbrella in the report was not detectable.¹ Yet, studies have found that discipline outcomes varied considerably among AA and

¹ U.S. Department of Education Office for Civil Rights. (2014). Civil Rights Data Collection. Data Snapshot: School Discipline. Washington, D.C. Retrieved July 21, 2021 from: <https://ocrdata.ed.gov/assets/downloads/CRDC-School-Discipline-Snapshot.pdf>

NHPI subgroups. SEAA students had suspensions and expulsion rates that were 2-3 times higher than East Asian students, while NHPI students were nearly twice as likely than White students to be disciplined.² When aggregated into one Asian category, however, the disproportionate rates of discipline for SEAA and NHPIs was not perceivable.

Additionally, while research has shown a strong link between early childhood education and K-12 achievement, SEAA students experience higher rates of poverty and instability during childhood years that influence their long-term performance. For example, 31% of Hmong and 22% of Cambodian children in Minnesota under 5 years of age live in poverty, compared to 18% of Asians overall and 11% of White children in the state. Only about 40% of Hmong and Cambodian students in Minnesota are considered proficient in math compared to 70% of Asian students overall and 63% White students.³

The Department should, at a minimum, update the self-reported race and ethnicity questions in the ECLS-K in the format of the sample question in Figure 1 of Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15), with the additions of “Cambodian” and “Laotian” to the examples in the write-in response area.

The next iteration of ECLS-K is a great opportunity to administer the revised SPD-15 disaggregated racial/ ethnic categories, with the additions of “Cambodian” and “Laotian” so that, at a minimum, the four most populous SEAA communities are clearly listed as examples. While implementation of a more detailed race and ethnicity question will be complex and necessitate revised checkboxes and survey items, the benefits of more detailed demographic data will be significant for education stakeholders. Implementing these changes can also inform lessons learned and guidance for other IES surveys and data collection from the Department. ECLS-K is currently one of the most comprehensive and nationally-representative longitudinal datasets offered by NCES. Data from ECLS-K can be used by researchers, policymakers, and civil rights organizations to understand the educational experiences and outcomes for young learners as well as used to drive policy and programmatic changes.

Given that the other nationally-representative, longitudinal datasets from NCES are either outdated (ELS: 2002; HSLS: 2009) or not publicly usable (MGLS: 2017), ECLS-K provides the best opportunity for diverse AA and NHPI communities to understand how our young people are doing in their elementary school systems. While ELS: 2002 and HSLS: 2009 were both promising datasets as they included disaggregated racial/ ethnic data in their survey questionnaires, these datasets are limited by relevance (i.e., they have not been recently updated

² Nguyen, BMD., Noguera, P., Adkins, N., & Teranishi, R. (2019). Ethnic Discipline Gap: Unseen Dimensions of Racial Disproportionality in School Discipline. *American Educational Research Journal*, 56(5): 1-29.

³ “Early Childhood Education: Opportunities for Southeast Asian Children.” 2015. A Council on Asian Pacific Minnesotans Report. Retrieved 29, May 2024: https://mn.gov/capm/assets/ECE%20Report_tcm1051-114466.pdf

over the past five years) and access (i.e., the disaggregated racial/ethnic data are restricted-use only). Still, there is value in these datasets when researchers are able to access them to understand educational disparities. For example, when school safety measures were disaggregated by AA and NHPI ethnicities, significant variation across their educational experiences emerged. SEAs are almost twice as likely to report feeling unsafe at school compared to Japanese, Korean, and White students, but this difference would not be noticeable without disaggregated racial data.⁴

A more detailed revision of the ECLS-K that better captures the diversity of America's children would provide the same rich information that is more timely and relevant. To better serve our nation's diverse students and ensure that their varied educational experiences and unique needs are made visible, and therefore actionable, SEARAC urges the Department to update the race and ethnicity question in the ECLS-K so that it explicitly includes, at a minimum, Cambodian, Hmong, Laotian, and Vietnamese as examples of Asian subgroups. Thank you for the opportunity to comment on this important data collection. If you have any questions, please contact Natalie Truong (she/her), SEARAC Associate Director of Education Policy, at natalie@searac.org.

Sincerely,



Quyen Dinh
Executive Director

⁴ Viano, S., & Truong, N. (2022). Black, Indigenous, People of Color and feelings of safety in school: Decomposing variation and ecological assets. *AERA Open*, 8, doi: 23328584221138484.