



November 4, 2024

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Suite E6300
Alexandria, Virginia 22314
Email: splimpto@nsf.gov

Subject: Agency Information Collection Activities; Comment Request; 2025 National Survey of College Graduates ([FR Doc. 2024-19850](#))

Dear Ms. Plimpton,

On behalf of the American Association for the Advancement of Science (AAAS) and the American Educational Research Association (AERA), thank you for the opportunity to comment on the National Center for Science and Engineering Statistics' (NCSES) proposed information collection request related to the 2025 National Survey of College Graduates (NSCG). See FR Doc. 2024-19850.

About AAAS: The American Association for the Advancement of Science (AAAS) welcomes the opportunity to provide comments on the National Survey of College Graduates (NSCG). AAAS is one of the world's largest multidisciplinary scientific societies, with members in all U.S. states and territories, and a leading publisher of cutting-edge research through the *Science* family of journals. Our mission is to advance science and innovation throughout the world for the benefit of all.

About AERA: As a longstanding affiliate of AAAS and as the interdisciplinary scientific society dedicated to the study of education and learning across institutions and contexts, the American Educational Research Association (AERA) is pleased to join in these comments. Founded in 1916, AERA is a major scientific association worldwide of 25,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good.

The Necessity of This Information Collection:

To maintain global competitiveness, the United States must ensure it is meeting the demand for a talented and larger STEM (Science, Technology, Engineering, Mathematics, and Medicine) workforce. Broadening the participation of underrepresented groups in STEM fields is a key solution to addressing this need. Collecting data on race and ethnicity, citizenship, inclusive gender (i.e., non-binary), age, disability status, sexual orientation, and place of birth will provide critical insights into current opportunities and persistent gaps. This data will help establish a future-oriented, inclusive STEM workforce capable of meeting the country's evolving needs.

Enhancing the Quality, Use, and Clarity of Collected Information:

AAAS and AERA have previously communicated with NCSES and the Office of Management and Budget about the importance of including sexual orientation and gender identity (SOGI) questions on surveys of the U.S. scientific workforce, including the NSCG, the Survey of Doctorate Recipients (SDR),

and the Survey of Earned Doctorates (SED). We applaud the recent addition of SOGI questions to the 2025 SED cycle and encourage NCSES to incorporate a sexual orientation question into the 2025 NSCG cycle.

The inclusion of SOGI data in the SED is a positive step toward broadening the participation of underrepresented groups in STEM. It is both logical and essential to have such information on undergraduates to monitor and assess where gains are being made and where losses occur. Furthermore, including similar data in the NSCG will help to ensure that LGBTQ+ and gender-diverse scientists with Bachelor's degrees in STEM fields are better represented in our data. This expansion will also enable longitudinal analysis to assess how well these communities are served by current career pathways and support mechanisms.

Minimizing the Burden of Collection:

As scientific societies, AAAS and AERA are committed to valid and reliable measures, we recognize the value of rigorous methodological approaches to survey updates. SOGI questions have been successfully vetted and implemented in federal surveys, and NCSES has already tested the response ordering effects of a sexual orientation question in the SED. The question design aligns with guidelines from the Office of Management and Budget and has been used effectively across federal agencies for over a decade. We echo the 2023 Federal Evidence Agenda on LGBTQI+ Equity Report from the National Science and Technology Council, which strongly advocates that SOGI data collection “must start immediately” given established methodological practices and proven data quality.

The Urgency of Addressing LGBTQ+ Disparities in the STEM Workforce:

Recent evidence highlights significant disparities affecting LGBTQ+ individuals in the U.S. scientific workforce. Understanding and addressing these disparities is urgent. Given the well-documented reliability of SOGI questions, we recommend NCSES incorporate these items immediately, without further exhaustive testing. The need for robust, inclusive data outweighs delays, especially given the extensive research and evidence supporting the quality of SOGI data within social science research.

Thank you in advance for your consideration. No agency is more important to the health and well-being of science and the STEM workforce than the National Science Foundation with this mandated mission. NCSES as the principal statistical agency within NSF can ensure that the data that we need in the ecosystem of science are available through the 2025 National Survey of College Graduates. AAAS and AERA stand ready to help in any way we can.

Sincerely,



Sudip S. Parikh, Ph.D.
Chief Executive Officer and
Executive Publisher, *Science Journals*
American Association for the Advancement of
Science (AAAS)



Felice Levine, Ph.D.
Executive Director
American Educational Research Association
(AERA)