

VIA PORTAL

February 24, 2025

Sheleen Dumas

Departmental PRA Clearance Officer

Office of Under Secretary for Economic Affairs

Commerce Department

RE: Docket No.: USBC-2024-0035

Dear Sheleen Dumas:

I. Introduction

Asian Americans Advancing Justice – AAJC (Advancing Justice – AAJC) appreciates the opportunity to comment in response to the notice published in the Federal Register on December 26, 2024 regarding the continued collection of data concerning the School Enrollment Supplement to be conducted in conjunction with the October Current Population Survey (CPS). As the Federal Register notes, the survey “provides information on public/private elementary school/secondary school, and college enrollment, and on characteristics of private school students and their families, which is used for tracking historical trends, policy planning, and support.” We are especially interested in how the Asian American community is represented in this data. The CPS is important to our community to ensure all Asian Americans have access to equal educational opportunities and data must be collected in a comprehensive and timely fashion, as well as in a manner that disaggregates data for different Asian American subgroups.

II. Organizational Background

Advancing Justice – AAJC is a national non-profit, non-partisan organization founded in 1991. For over thirty years, we have served as a leading Asian American voice on civil rights issues in our nation’s capital. Our mission is to advance civil and human rights for Asian Americans and to build and promote a fair and equitable society for all.

Advancing Justice – AAJC considers data collection and reporting critical to achieving its mission. We have been working to eliminate the barriers that have historically resulted in the undercounting and underreporting of Asian Americans in federal data collection and analysis efforts. We have conducted comprehensive national, state, and local outreach and educational

projects focused on the Asian American communities for Census 2000, Census 2010, and Census 2020. Ensuring our communities “see” themselves in how race and ethnic data are collected is an important aspect of our advocacy and engagement on data collection and reporting. We appreciate the importance of fact-based analyses for identifying disparate access and outcomes and devising effective solutions. In addition to extensive work engaging on census policy and community outreach and education to encourage participation in the surveys conducted by the Census Bureau, Advancing Justice – AAJC has been a key stakeholder in discussions over SPD-15. Moreover, we work to promote educational equity for the nation’s diverse Asian American communities and to protect the civil and human rights of all students and families. Finally, more than 300 local organizations are involved in Advancing Justice – AAJC’s Community Partners Network, serving communities in 37 states and the District of Columbia.

III. Current Population Survey, School Enrollment Supplement

(A) Evaluate Whether the Proposed Information Collection is Necessary for the Proper Functions of the Department, Including Whether the Information Will Have Practical Utility

The proposed information collection is necessary for the proper functioning of the Department and has immense practical utility for the public. As noted in the Federal Register, information on student enrollment at the elementary, secondary, and collegiate level—in addition to data on characteristics on private school students and their families—enables “tracking historical trends, policy planning, and support.” Moreover, the Federal Register also states “this survey is the only source of national data on the age distribution and family characteristics of college students and the only source of demographic data on preprimary school enrollment.” The continued collection of the School Enrollment Supplement ensures that this information is available to the Department—and has immense practical utility for the educators, school administrators, scholars, and advocates who rely on this information for their work.

At Advancing Justice – AAJC, this information collection is critical for helping to advance our education advocacy goals because it provides disaggregated data on Asian American communities. For example, a 2020 report by the Southeast Asia Resource Action Center and the Institute for Higher Education Policy examined high school completion and college attendance rates for different Asian American subgroups. They found, “[a]bout one quarter of Southeast Asian American adults have not graduated from high school, compared to only 12 percent of all Asians and 12 percent of all American adults. Furthermore, another 26 percent of Cambodian, 24 percent of Hmong, 31 percent of Lao, and 20 percent of Vietnamese Americans have graduated high school, but have not attended college for any period of time, compared with only 15 percent of all Asian adults and 27 percent of all adults.”¹ As we detail below, this disaggregated data helps illuminate differences between subgroups—the first step in addressing the problem and ensuring all students have access to educational opportunities including and beyond K-12.

¹ https://www.ihep.org/wp-content/uploads/2020/11/ihep_aapi_brief.pdf

(C) Evaluate Ways to Enhance the Quality, Utility, and Clarity of the Information to Be Collected

Implement SPD-15

Advancing Justice – AAJC strongly supports the updated standards OMB published on March 29, 2024 that provided new guidance for measuring, collecting, and tabulating information on race and ethnicity. We urge the continued collection of disaggregated data for the School Enrollment Supplement. Below, we explain why the use of disaggregated data as a default is essential for Asian Americans generally and for the collection of School Enrollment Supplement data specifically.

Collecting detailed data by default is particularly critical for Asian Americans, who are among our nation’s fastest growing and most diverse racial groups.² Often viewed as homogenous, these communities include more than 30 detailed subgroups that can differ dramatically across key social and economic indicators. These differences are not new.³ Disaggregating Asian American students into detailed groups allows for proper planning to address gaps and problems that exist for specific communities.

In addition to the critical role that disaggregated data play in crafting policy and program changes, they also do important cultural and narrative work to debunk the false stereotype that Asian Americans are “high achieving” students. The following examples help highlight how disaggregated data show disparities between and among different Asian subgroups in education:

- According to The Leadership Conference Education Fund, “the barriers to college access and success Southeast Asian American (SEAA) students face are more like those faced by Black and Latino students than other groups of Asian American students.”⁴
- Disaggregated data also help show disparities in college completion. Data on students in Washington State revealed that while 57% of Asian Indians and 42% of Japanese Americans received a bachelor's degree or higher between 2011 and 2013, only 16% of Vietnamese and only 9% of Laotian American students attained a bachelor's degree during the same time period—which was well below the statewide average of 32%.⁵
- Further disaggregating data by gender reveals additional differences between subgroups. For example, a report published by the Institute for Immigration, Globalization, and Education at UCLA noted that some school districts in California with large AAPI

²In our comment responding to the Federal Register Notice on Initial Proposals for Updating OMB’s Race and Ethnicity Standards (Document Citation: 88 FR 5375), we detail why we back the collection of race and ethnicity information using one combined question; the addition of Middle Eastern or North African as a new minimum category; and the requirement to collect detailed race and ethnicity categories as a default. See <https://www.advancingjustice-aaajc.org/sites/default/files/2023-05/Advancing%20Justice%20Affiliation%20OMB%20Revised%20Standards%20Comments%20FINAL%204.27.23.pdf>.

³ See examples outlined in Yeh, Theresa Ling. “Issues of College Persistence between Asian and Asian Pacific American Students.” *Journal of College Student Retention : Research, Theory & Practice* 6, no. 1 (2004): 81–96. <https://doi.org/10.2190/MG9G-76UR-7BUK-5JUW>.

⁴ <https://civilrightsdocs.info/pdf/reports/Information-Nation-2022.pdf>

⁵ <https://vtechworks.lib.vt.edu/server/api/core/bitstreams/4a80530c-e7bb-4832-902c-878a32fbe934/content>

concentrations had Southeast Asian, Pacific Islander, and Filipino males dropping out at a rate of 50%. According to the Report, this “is more than twice the statewide male dropout rate and nearly three times the national average.”⁶

- The importance of disaggregated data in education is not limited to K-12; it also applies in the medical education context. A recently published article found “pervasive underrepresentation of Laotian individuals, Cambodian individuals, and Filipino individuals at every career stage, from medical school matriculants to faculty.”⁷

The disaggregated data examples above help dispel harmful narratives that portray all Asian Americans as high achievers—a stereotype that has a real impact on students. According to one 2005 study, Asian Americans “have lower levels of mental health and higher levels of psychological distress and depression than other students.”⁸ AAPI students often forgo mental health treatment, further exacerbating this problem.⁹ The guidelines for disaggregating data outlined in SPD-15 enable valuable data collection on Asian American subgroups.

The Current Population Survey School Enrollment Supplement tells us how Asian American children are doing in their schools—from pre-primary through college. This resource supplies valuable information on topics important to the Asian American community. Without these metrics, it is nearly impossible to see differences between different Asian subgroups—leaving the needs of the most vulnerable students unmet. Disaggregated data points such as these are especially critical given the pernicious stereotypes about high achieving Asian American students since they provide tangible evidence of students in need of resources, services, and support.

Finally, beyond accurately counting the major racial groups and disaggregating data by subgroup, it is imperative that this extends to the multiracial population. The School Enrollment Supplement currently reports out information on biracial students and students who identify as more than two races, providing the specific racial breakdowns (e.g., Black-Asian, W-B-A, and W-AI-A). This is a best practice and is preferred over solely reporting out “two or more races,” which does not provide an accurate or nuanced portrait of the growing population of multiracial children.¹⁰ We know that the educational experiences of multiracial students are not identical. Under the current framework, we have the data to know how different multiracial students are impacted differently. Similar to disaggregating data more broadly, this prevents us from being

⁶ <https://race.usc.edu/wp-content/uploads/2020/08/Pub-5-Teranishi-and-Ngyuen.pdf>

⁷ <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2826367>

⁸ <https://med.stanford.edu/content/dam/sm/care/Asian-American-Student-Stress-.pdf>

⁹ <https://medium.com/national-center-for-institutional-diversity/addressing-asian-american-pacific-islander-college-students-mental-health-needs-4413a55f49b7>

¹⁰ It is important to note that a number of factors may have informed the increase in the number of children who identify as multiracial. While there may be an increase in the actual number of multiracial individuals, the Census Bureau also notes that the increase could largely be “due to the improvements to the design of the two separate questions for race and ethnicity, data processing and coding, which enabled a more thorough and accurate depiction of how people prefer to self-identify.” Either way, it’s important to ensure that data on multiracial individuals is detailed and accurate. [https://www.census.gov/library/stories/2021/08/improved-race-ethnicity-measures-reveal-united-states-population-much-more-multiracial.html#:~:text=The%20percentages%20increased%20for%20children,\(23.1%25%20to%2025.7%25\)](https://www.census.gov/library/stories/2021/08/improved-race-ethnicity-measures-reveal-united-states-population-much-more-multiracial.html#:~:text=The%20percentages%20increased%20for%20children,(23.1%25%20to%2025.7%25)).

able to identify the most marginalized students and to ensure those multiracial individuals are getting the educational resources they need to succeed. It is important to understand the different identities of multiracial and multiethnic individuals. We urge you to continue providing detailed breakdowns since this could help to illuminate evidence of educational discriminatory patterns as well as of ongoing or emerging educational issues for our communities.

Releasing Data

In addition to reporting out on the six largest Asian groups, the School Enrollment Supplement should report out data on other Asian groups. We have seen the population of Asian Americans grow faster outside the top six groups of Asian Indian, Chinese, Filipino, Japanese, Korean and Vietnamese since 2000. The share of the other Asian categories in the 2000 to 2020 Censuses has increased from 12% in 2000 to 20% in 2020. Additional means to create disaggregated categories that meet population thresholds by aggregating similar communities would provide new levels of detail for Asian American communities. This is especially important since the current framework does not allow for smaller, yet still significant subgroups (such as Hmong) to see themselves in the data—and thus address any disparities these communities face.

Meaningful Public Engagement

It is imperative that the public, including researchers and academic experts, community leaders, and survey respondents, are consulted as part of the research and planning for the Current Population Survey School Enrollment Supplement. This will ensure that more accurate and useful data are produced. Incorporating information from different types of engagements with the public and the frequency of those engagements can help produce better data in the long run. These engagements are especially important given the nation's ever-changing demographics and the ways in which racial and ethnic categories are socially constructed and change over time. Active public engagement will not only ensure the accuracy of federal data, involving impacted community members early in the process gives them ownership over the content and outcome—building trust in the democratic process and potentially incentivizing increased participation in census surveys. It is imperative that community organizations and leaders are engaged and consulted on these issues moving forward because mistakes and inaccuracies occur in the absence of community input.

We offer the following as best practices for community engagement:

- Engage interested stakeholders early and often. Bringing community members into the conversation early in the planning process can circumvent mistakes and inaccuracies—which undermine trust in the federal government and broader efforts to collect data on impacted communities.
- Connect with a diverse set of stakeholders, including both community-specific partners as well as those representing a more pan-ethnic perspective.
- Be specific about what is being discussed, any requests being made of the community, and what specific information the agency is attempting to obtain. In instances of prior engagement, it is incumbent on the agency to highlight any major changes that have occurred or are being considered at the point of the most recent request, as well as lifting

up any points of potential controversy for feedback. Providing specific requests and the requisite background information will only help groups provide the most useful feedback to the agency.

(D) Minimize the Reporting Burden on Those Who Are to Respond, Including the Use of Automated Collection Techniques or Other Forms of Information Technology

We believe that no exemptions should be given when it comes to granting full or partial exemptions from collecting data that use the detailed categories under the revised SPD-15 for the School Enrollment Supplement. As the examples of disaggregated data above demonstrate, the benefits of having disaggregated data far outweigh any potential burdens. Without disaggregated data it will be difficult, if not impossible, to offer and implement solutions that impact marginalized members of the Asian American community—leaving the most vulnerable Asian American students behind. We know that stereotypes about Asian Americans and academic success can further mask inequalities between groups, underscoring the importance of disaggregating data by subgroup.

Moreover, we know from the 2020 Census that people under the age of 18 are more racially and ethnically diverse than the population over the age of 18.¹¹ And experts at The Civil Rights Project predict that the increase in racial and ethnic diversity will continue for the school-age population.¹² These changing demographics mean that it's even more essential we have detailed demographic information beyond the minimum race and ethnicity categories. Without disaggregated data, it's extremely difficult to identify and serve the most marginalized subgroups. As such, no exemptions should be made.

IV. Conclusion

Thank you for this opportunity to comment on the collection, use, and reporting of education data. The failure to implement the revisions outlined in SPD-15, including disaggregating data by default, would hamper the ability of the department to fulfill its obligations and would undermine our shared interest in the best education for every child.

¹¹ <https://www.census.gov/newsroom/blogs/random-samplings/2023/09/exploring-diversity.html>

¹² <https://civilrightsproject.ucla.edu/research/demographic-studies/the-changing-racial-and-ethnic-composition-of-the-school-age-population-in-the-u.s/National-demographic-11272023.pdf>