



OFFICE OF THE VICE PRESIDENT - GRADUATE AND UNDERGRADUATE AFFAIRS
AND VICE PROVOST - EQUITY, DIVERSITY AND INCLUSION

OFFICE OF THE PRESIDENT
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April 25, 2022

Stephanie Valentine
PRA Coordinator
Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW
LBJ, Room 6W208B
Washington, DC 20202-8240

Re: Docket ID Number [ED-2022-SCC-0026], Integrated Postsecondary Education Data System (IPEDS) 2022–23 through 2024–25

Dear Ms. Valentine:

On behalf of the University of California (UC), thank you for the opportunity to comment on the U.S. Department of Education (ED) proposed information collection request for the Integrated Postsecondary Education Data System (IPEDS) 2022–23 through 2024–25.

The University of California benefits the nation through world-class educational opportunities, groundbreaking research, top-rated health care, a firm commitment to public service, and agricultural expertise. The UC system consists of 10 campuses, six academic health centers, three national laboratories, and a statewide agriculture and natural resources division. UC is also involved in the management of three national laboratories on behalf of the U.S. Department of Energy. The University is home to more than 285,000 students, 227,000 faculty, staff, and other academics, and more than 2 million living alumni.

UC is offering comments on two components of your proposed information collection changes: undocumented students and nonbinary students. I will begin with undocumented students. Undocumented students can be found across the 10 campuses and making profound contributions to the UC community and across California. UC's unwavering support of undocumented students is evidenced by our legal filing in federal court that challenged the executive order that attempted to rescind the Deferred Action for Childhood Arrivals (DACA) in 2017. In 2020, the U.S. Supreme Court ruled in favor of UC and struck down the federal government's attempt to end the program.

California is also home to over 2 million undocumented immigrants — more than any other state, with the largest percentages hailing from Latin America and Asia. According to 2017 data from the Education Trust-West, California preschool and K–12 schools enroll about 250,000 undocumented children ages 3–17. As a result, many of these students will matriculate to California's esteemed public higher education institutions, where a majority will graduate with a

bachelor's degree. With this perspective in mind, we respectfully request that the Department of Education require that all undocumented students, both those with DACA and those without, be reported in IPEDS within their race and ethnicity. The Department of Education guidance, as written, inaccurately groups DACA recipients with international students (who do not have their race and ethnicity reported) and non-DACA undocumented students as "race and ethnicity unknown." UC believes recognizing and serving our undocumented students is fundamental to our mission as an institution of higher education rooted in access and equity.

UC is home to five Hispanic Serving Institutions (HSI) with the remaining four undergraduate institutions being recognized as Emerging HSIs. UC also has two Asian American Native American Pacific Islander Serving Institutions (AANAPISI)-designated campuses with several more eligible that will eventually be applying for designation. UC is very proud that as a research-intensive public university, it is able to balance its goals for access and equity. It is critically important that UC be able to consider the race and ethnicity of its undocumented (including DACA) students in applying for the discretionary HSI and AANAPISI grant programs because academic support services designed for persistence and completion of degrees do not segregate based on a student's immigration status. Finally, UC applauds the decision to discontinue use of the term "alien" in reference to undocumented students.

Second, UC expresses support for the proposal to include an additional question on the number of students whose gender does not conform to the binary male or female categories. This is a step in the right direction of eventually allowing institutions to report their official enrollment and completion data based on a more expanded set of gender identity categories that more closely match the reality of how students identify. While UC appreciates the National Center for Education Statistics (NCES) recognizing that gender is not a binary, we believe they need to go further and have the actual data collection questions be inclusive of nonbinary students. More than 3,000 UC students identify as a nonbinary gender, and our public reporting reflects this gender diversity. UC looks forward to when the federally reported data matches how institutions represent their students. Similar to the discontinuation of the term "alien," NCES should use less stigmatizing language than "gender other" to identify nonbinary students. UC suggests "nonbinary students" or "students with another gender identity."

Thank you for considering the University of California's comments. If you have any questions regarding these comments, please contact Chris Harrington, associate vice president for federal governmental relations, at Chris.Harrington@ucdc.edu or 202-997-3150.

Sincerely,



Yvette Gullatt

Vice President for Graduate and Undergraduate Affairs and
Vice Provost for Equity, Diversity and Inclusion

cc: Senior Vice President Colburn, External Relations and Communications
Associate Vice President Harrington, Federal Governmental Relations