



April 27, 2023

Bob Sivinski  
Chair, Interagency Technical Working Group on Race and Ethnicity Standards  
Office of Management and Budget  
1650 17<sup>th</sup> St. NW  
Washington, DC 20500

Dear Mr. Sivinski,

On behalf of the undersigned higher education associations, I write today to comment on the Office of Management and Budget's (OMB) notice and request for comments published in the *Federal Register* on January 27, 2023 (Docket No. 2023-01635).

OMB's proposed changes to Statistical Policy Directive No. 15 (SPD 15) are a much-needed update to the statistical standards used to collect data on race and ethnicity across federal agencies. In particular, we welcome the addition of a Middle Eastern or North African response category, which would allow the data we submit to the federal government to better reflect the diversity of our students and staff.

As these changes are incorporated into the Integrated Postsecondary Education Data System (IPEDS), we ask OMB to consider the time and effort required for postsecondary institutions to update the data infrastructure necessary to accurately respond to the annual survey components. IPEDS currently collects race/ethnicity data in the Fall Enrollment, 12-month Enrollment, Completions, Graduation Rate, and Human Resources survey components. Adding a new Middle Eastern or North African category, in addition to the combined race and ethnicity categories, would require updates to the forms used to collect data from students and staff, as well as software systems changes to store the data. While some postsecondary institutions are able to make these software updates in-house, many rely on vendors whose timelines are beyond their control. If institutions were required to re-survey students using the new categories, this would necessitate a longer implementation period. We urge the U.S. Department of Education to include input from the field to ensure that these efforts are factored into reporting deadlines.

Further, we echo a concern raised in OMB's public listening sessions. Combining race and ethnicity will impact the data used for institutional designations and may negatively impact higher education institutions that enroll populations with significant percentages of undergraduate minority students. For example, changes to this data could harm Hispanic-Serving Institutions, whose designation and eligibility for federal funds is determined based on the percentage of full-time equivalent students who identify as Hispanic or Latino. We encourage OMB to work with the Department of Education to ensure that all minority-serving institutions have ample time to respond to the changes and do not risk losing eligibility.

We appreciate your attention to these comments. We look forward to working with OMB and the Department of Education to ensure that any changes made to SPD 15 will best serve the needs of students, educators, and institutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell". The signature is written in a cursive, slightly slanted style.

Ted Mitchell  
President

On behalf of:

American Association of Collegiate Registrars and Admissions Officers  
American Association of Community Colleges  
American Association of State Colleges and Universities  
Association of American Universities  
Association of Catholic Colleges and Universities  
American Council of Education  
Association of Governing Boards of Universities and Colleges  
Association of Jesuit Colleges and Universities  
Association of Public and Land-Grant Universities  
CCCU – Council for Christian Colleges and Universities  
College and University Professional Association for Human Resources  
EDUCAUSE  
NASPA-Student Affairs Administrators in Higher Education  
National Association of College and University Business Officers  
National Association of Independent Colleges and Universities  
National Association of Student Financial Aid Administrators  
State Higher Education Executive Officers Association