

November 4, 2024

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation

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

Dear Ms. Plimpton:

On behalf of the Council of Professional Associations on Federal Statistics (COPAFS), 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* 89 FR 71938 (September 4, 2024).

COPAFS has consistently stressed the importance and feasibility of including sexual orientation and gender identity (SOGI) questions on surveys of the U.S. scientific workforce, include the NSCG, Survey of Doctorate Recipients (SDR), and Survey of Earned Doctorates (SED). We are pleased that important progress has been made, with NCSES recently adding SOGI questions to the 2025 SED cycle that began this past June. Two years ago, NCSES added a gender identity question to the 2023 NSCG cycle but, surprisingly, excluded a sexual orientation question, citing data quality concerns. NCSES has now re-tested a sexual orientation question and its potential response ordering effects in the NSCG, using the question design recommended by the Office of Management and Budget that has been used successfully across the federal government for over 10 years. We are hopeful, and as stakeholders certainly expect, that NCSES will quickly generate solutions to this well-vetted and long-used sexual orientation question for the 2025 NSCG cycle.

While we understand NCSES' desire to take a measured approach, we also note that demographic questions are never perfect. Federal-wide standards on race and ethnicity questions have been revised several times and are currently again under revision. We reiterate the National Science and Technology Council's 2023 *Federal Evidence Agenda on LGBTQI+ Equity* Report's recommendation that SOGI data collection in federal statistical surveys "must start immediately" in light of the government's well-developed methodological practices and proven track-record in excellent data quality and protection of privacy. Given the alarming evidence of LGBTQI+ disparities in the U.S. scientific workforce, we feel strongly that the urgent need to understand and address these disparities by adopting SOGI measures now outweighs any desire NCSES may have to further exhaustively test these measures. This is particularly the case for exploratory, non-essential tests that seek to incrementally advance federal-wide SOGI measurement issues, such as response ordering effects, rather than tests that seek merely to confirm the basic viability of SOGI questions now for NCSES' surveys.



NCSES can and should always work to improve how it collects demographic information, but the agency is long overdue to begin collecting SOGI data on its workforce surveys, including sexual orientation data on the NSCG.

Thank you for your consideration.

Sincerely,

Paul Schroeder
Executive Director