



James Kvaal  
Under Secretary of Education  
U.S. Department of Education

Richard Cordray  
Chief Operating Officer, Federal Student Aid  
U.S. Department of Education

October 21, 2021

**Re: FAFSA Simplification and Data Collection**

Dear Mr. Kvaal and Mr. Cordray,

We, the undersigned **55** Asian American, Native Hawaiian, and Pacific Islander (AANHPI) organizations, civil rights organizations, and organizations focused on postsecondary equity, urge you to include disaggregated racial and ethnic subgroup data collection as part of Federal Student Aid’s (FSA) implementation of the sub-agency’s Free Application for Federal Student Aid simplification process. The collection, analysis, and reporting of disaggregated AANHPI student data is a primary civil rights issue for AANHPIs and a necessary component of creating equitable policies to identify gaps in resources and educational needs among our diverse communities.

As written in the 2020 omnibus, FSA should expand the collected racial and ethnic subgroups beyond the collected Census categories and collect reported Census racial and ethnic subgroup data instead. Specifically, for AANHPIs, that would include **Chinese, Asian Indian, Filipino, Japanese, Korean, Vietnamese, Pakistani, Cambodian, Hmong, Laotian, Thai, Taiwanese, Burmese, Bangladeshi,** and **Nepalese** sub-populations, **“Other Asian”** sub-populations (to capture less-populated communities), and **Native Hawaiian, Samoan, Chamorro, Tongan, iTaukei, Marshallese,** and **“Other Pacific Islander”** sub-populations.

The AANHPI population is tremendously diverse. The US Census Bureau reports data annually on at least 22 distinct, self-identified AANHPI groups, each with unique linguistic, cultural, and historical differences. In particular, Native Hawaiian and Pacific Islanders (NHPI) and Southeast Asian Americans (SEAA) face unique and significant challenges with educational access and attainment compared to the broader Asian American subgroup. These differences are lost when data systems aggregate the AANHPI community in ways that mask inequities in outcomes.

Aggregated AANHPI data obscures the disparities and unique challenges faced by SEAA and NHPI communities. Where disaggregated data is available, it often reveals vast differences in education and socioeconomic needs among the broader AANHPI populations. According to data from the US Census Bureau, around a quarter of SEAA adults aged 25 and older do not have a high school diploma, compared to 12% of all Asians and 12% of the total population.<sup>1</sup> An additional 42% of Cambodian, 44% of Hmong, 48% of Lao, and 37% of Vietnamese American high school graduates have not continued on to earn their bachelor's degree, compared to 29% of all Asians.<sup>2</sup> The proportion of NHPI adults who have not enrolled in any postsecondary education is particularly high for NHPI ethnic sub-groups, including 57.9% of Samoans, 56.8% of Tongans, 53.0% of Native Hawaiians, and 49.3% of Guamanians or Chamorros.<sup>3</sup> As students from low-income, refugee communities that have been underserved and marginalized, structural inequities, such as lack of language access and culturally relevant support, negatively affect SEAA students' opportunities in school. Inequities persist through higher education as well, with SEAA and NHPI students often lacking support navigating the college admissions process and being unable to afford higher education. Among NHPI students who do attend college, persistence and degree attainment are also relatively low. NHPI college students have the highest attrition rates of any ethnic sub-group in the AANHPI community. A significant proportion of Samoans (58.1%), Tongans (54.2%), Native Hawaiians (50.0%), and Guamanians or Chamorros (47.0%) who begin college leave without earning a college degree.<sup>4</sup>

Disaggregated data also reveals disparities in levels of income and poverty for SEAs and NHPIs. Nationwide, close to 1.1 million SEAA are low-income, including over 460,000 who live in poverty. All SEAA ethnic groups have lower per capita incomes than average and also struggle with housing stability. Nearly 60% of Hmong Americans are low-income, and more than one of every four live in poverty. Among SEAA ethnic groups, with the exception of

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<sup>1</sup> U.S. Census Bureau. 2019 American Community Survey, 1-year estimates. Retrieved from: <https://www.census.gov/newsroom/facts-for-features/2021/asian-american-pacific-islander.html>

<sup>2</sup> SEARAC and Asian Americans Advancing Justice. (2020). Southeast Asian American Journeys: A National Snapshot of Our Communities. Retrieved from: [https://www.searac.org/wp-content/uploads/2020/02/SEARAC\\_NationalSnapshot\\_PrinterFriendly.pdf](https://www.searac.org/wp-content/uploads/2020/02/SEARAC_NationalSnapshot_PrinterFriendly.pdf).

<sup>3</sup> APIA Scholars. (2019) Native Hawaiian and Pacific Islanders in Higher Education: A Call to Action. Retrieved from: [https://apiascholars.org/wp-content/uploads/2019/12/NHPI\\_Report.pdf](https://apiascholars.org/wp-content/uploads/2019/12/NHPI_Report.pdf).

<sup>4</sup> Ibid

Hmong Americans, renters spend more than 30% of their income on housing-related costs.<sup>5</sup> Those with home mortgages are also more likely to be housing cost burdened than average (32%). Vietnamese American mortgagors (45%) have the highest rate of being housing cost-burdened than all racial groups. For NHPIs, 20.5% adults report being food insecure compared to only 7.7% of White adults. The poverty rate among people who identified only as NHPI was 16.5% in 2019 compared to 10% for Asian Americans and 13% in the U.S. overall.<sup>6</sup>

Additionally, current minimum standards are insufficient for accurately capturing the entirety of the Southeast Asian American community and often only explicitly lists Vietnamese Americans while grouping over 700,000 Cambodian, Hmong, and Lao Americans as “other Asian.” Similarly, the category of “Native Hawaiian and Pacific Islanders” include over 40% NH’s while aggregating the experiences of the other 60% of PI’s. Efforts must be taken across federal education agencies to equitably collect, analyze, and report disaggregated AANHPI data by race and ethnicity, not citizenship and nationality, in order to better inform the policy.

In 2007, the Department of Education required education agencies to collect and report data for “Asian” and “Native Hawaiian or Other Pacific Islander” in accordance with the 1997 Office of Management and Budget Standards for the Classification of Federal Data on Race and Ethnicity. In 2012, the Department issued a Request for Information to gather and share information about practices and policies regarding existing education data systems that disaggregate data on sub-groups within the AANHPI student population. It found that school districts, state education agencies, and institutions of higher education consistently did not disaggregate data beyond what is required by the federal government. The rapid changes and developments among Asian American and Native Hawaiian and Pacific Islander communities necessitate that data disaggregation collection, tabulation, and reporting standards are updated, and FSA and the Department of Education must provide guidance and leadership for State and Local Education Agencies to also advance data disaggregation.

As the FSA begins to implement FAFSA simplification, we reiterate the need for you and your staff to expand the racial and ethnic subgroup categories to include, at a minimum, reported Census categories, specifically, the explicit inclusion of **Chinese, Asian Indian, Filipino, Japanese, Korean, Vietnamese, Pakistani, Cambodian, Hmong, Laotian, Thai, Taiwanese, Burmese, Bangladeshi,** and **Nepalese** sub-groups, and **Native Hawaiian, Samoan, Chamorro, Tongan, iTaukei, and Marshallese.** “Other Asian” and “Other Pacific Islander” should also

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<sup>5</sup> SEARAC and Asian Americans Advancing Justice. (2020). Southeast Asian American Journeys: A National Snapshot of Our Communities. Retrieved from: [https://www.searac.org/wp-content/uploads/2020/02/SEARAC\\_NationalSnapshot\\_PrinterFriendly.pdf](https://www.searac.org/wp-content/uploads/2020/02/SEARAC_NationalSnapshot_PrinterFriendly.pdf).

<sup>6</sup> Long, C. R., Rowland, B., McElfish, P. A., Ayers, B. L., & Narcisse, M. R. (2020). Food Security Status of Native Hawaiians and Pacific Islanders in the US: Analysis of a National Survey. *Journal of nutrition education and behavior*, 52(8), 788–795. <https://doi.org/10.1016/j.jneb.2020.01.009>

be included with a write-in option as well, utilizing the evidence-based format of a “Combined Question for Race and Ethnicity with Detailed Checkboxes and Write-in Areas” because research demonstrates that this format yields the most accurate responses and the least confusion.<sup>7</sup> Where it can, the subagency can and should disaggregate further data collected further to include subgroups, such as the lu Mien and Montagnards under Asian American.

Thank you for considering our recommendations. Please contact Natalie Truong, SEARAC Education Policy Manager at [natalie@searac.org](mailto:natalie@searac.org) or Julie Ajinkya, Senior Vice President and Chief Strategy Officer of APIA Scholars at [julie.ajinkya@apiasf.org](mailto:julie.ajinkya@apiasf.org) if you have questions or comments.

Sincerely,

## **National Organizations**

AAPI Data

APIA Scholars

Asian Pacific American Labor Alliance, AFL-CIO

Asian Pacific Americans for Higher Education

Asian Pacific Partners for Empowerment, Advocacy and Leadership (APPEAL)

Center for American Progress

Clearinghouse on Women's Issues

Empowering Pacific Islander Communities (EPIC)

Feminist Majority Foundation

Fred T. Korematsu Institute

Higher Learning Advocates

Hmong Public Health Association (HPHA)

Institute for Higher Education Policy (IHEP)

Japanese American Citizen's League

Leadership Education for Asian Pacifics (LEAP)

National Action Network

National Asian American Pacific Islander Mental Health Association

National Center for Learning Disabilities

National Council of Asian Pacific Americans (NCAPA)

National Immigration Law Center (NILC)

National Women's Law Center

OCA – Asian Pacific American Advocates

SHK Global Health

Sikh American Legal Defense and Education Fund (SALDEF)

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<sup>7</sup> Marks, R. and Jones, N. (2020). “Collecting and Tabulating Ethnicity and Race Responses in the 2020 Census.” Population Division, U.S. Census Bureau. Retrieved from: <https://www2.census.gov/about/training-workshops/2020/2020-02-19-pop-presentation.pdf>.

South Asian Public Health Association (SAPHA)  
Southeast Asia Resource Action Center (SEARAC)  
Teach For America  
The Asian, Desi, Pacific Islander Collective  
The Education Trust  
The Institute for College Access & Success (TICAS)  
uAspire  
Union for Reform Judaism

## **States**

### California

API Caucus at University of California, Los Angeles (UCLA), Luskin  
Asian American and Pacific Islander Education Association, Chabot College  
AYPAL: Building API Community Power  
California State University, Fullerton  
California State University, Sacramento  
California State University, Northridge  
Fresno Interdenominational Refugee Ministries (FIRM)  
Khmer Girls in Action  
Laney College

### District of Columbia

Georgetown University Center on Education and the Workforce

### Illinois

University of Illinois, Chicago (UIC) Asian American Resource and Cultural Center

### Massachusetts

Asian American Resource Workshop (AARW)

### Minnesota

Coalition of Asian American Leaders

### Nevada

Asian Community Development Council  
Minority-Serving Institution Student Council (MSISC) at the University of Nevada, Las Vegas  
One APIA Nevada  
University of Nevada, Las Vegas

### New York

Coalition for Asian American Children and Families (CACF)

### Rhode Island

Alliance of Rhode Island Southeast Asians for Education (ARISE)

Pennsylvania  
Woori Center

Texas  
Texas Data Quality Coalition

Washington  
Highline College  
Southeast Asian American Education Coalition (SEAE)