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April 25, 2022

Michelle Asha Cooper, Acting Assistant Secretary for Postsecondary Education  
U.S. Department Of Education  
Office of Postsecondary Education  
Lyndon Baines Johnson (LBJ) Building  
400 Maryland Avenue, S.W.  
Washington, DC 20202

Dear Acting Assistant Secretary Cooper,

Campus Pride and the 36 undersigned organizations urge the National Center for Education Statistics (NCES) to incorporate nonbinary students into all categories of the Integrated Postsecondary Education Data System (IPEDS).

While we appreciate that NCES is proposing to add a single question to IPEDS that asks colleges about the number of students at their institutions who identify as other than female or male, this change is not enough. Nonbinary students need to be included in all gender breakdowns so that their experiences, which are often very different from female and male students, can be recognized and fully accounted for in order to ensure a safe, inclusive learning environment. The value of nonbinary inclusion should outweigh any added reporting burden on colleges.

We feel that this change is especially important because more and more students are identifying as nonbinary. For example, the number of students identifying as trans or nonbinary on the American College Health Association's National College Health Assessment (NCHA) has nearly tripled in the last five years, with most of this increase because of the growth in respondents identifying as nonbinary. Other national surveys of college students, such as the

Multi-Institutional Study of Leadership (MISL), the National Survey of Student Engagement (NSSE), the Student Experience in the Research University (SERU), and Cooperative Institutional Research Program (CIRP) Freshman Survey, also ask gender identity and have seen a significant increase in students indicating that they are nonbinary.

The Common Application, the Coalition Application, and the Universal College Application, which together manage the admissions applications for more than 1,200 colleges and universities, all enable students to identify their gender identity and include a “nonbinary” option. In addition, “nonbinary” is a category for “legal sex” in 24 states, where individuals can have an “x” as their gender marker on their driver’s license and/or birth certificate. Thus, colleges have a significant number of students who are indicating that they are nonbinary and who are not accounted for by the current IPEDS reporting process.

We recommend that, at a minimum, NCES add a “nonbinary gender identity” category to all tables. As some colleges have more detailed gender identity information on their students, NCES should consider including these additional gender options: agender, gender fluid, genderqueer, questioning, trans man, and trans woman. These options would allow for a more comprehensive understanding of students across gender identities.

Expecting all colleges to collect and report data on their nonbinary students will require institutions to acknowledge this population, provide more accurate information, and recognize that gender is not a binary. Hopefully this change would lead colleges to provide more support to nonbinary students and work to eliminate institutional gender binaries, such as by offering gender-inclusive restroom and housing options and having forms that allow for more than M/F as gender choices. In short, obtaining and releasing data on nonbinary students would be an important step in ending the invisibility and marginalization of this group in higher education.

We thank NCES for considering the inclusion of nonbinary students in all IPEDS categories as part of its efforts to more accurately represent student populations. If you would like to discuss this proposal with us, please contact Dr. Genny Beemyn, the coordinator of Campus Pride’s Trans Policy Clearinghouse, directly at [tpc@campuspride.org](mailto:tpc@campuspride.org) or by contacting Campus Pride at 704-277-6710. Thank you.

Sincerely,

ACPA-College Student Educators International  
Advocates for Youth  
American Association of Colleges and Universities  
American Association of Collegiate Registrars and Admissions Officers  
American Association of State Colleges and Universities  
Association of College and University Housing Officers-International  
Athlete Ally  
Campus Pride  
Center for LGBTQ Economic Advancement & Research (CLEAR)  
CenterLink: The Community of LGBT Centers  
Common App  
Consortium of Higher Education LGBT Resource Professionals  
Equality Federation  
FORGE, Inc.  
GLSEN  
interACT: Advocates for Intersex Youth  
Mazzoni Center  
Modern Military Association of America  
Movement Advancement Project  
NASPA - Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
National Association for Equal Opportunity in Higher Education (NAFEO)  
National Black Justice Coalition  
National Center for Transgender Equality  
National LGBT Cancer Network  
National LGBTQ+ Bar Association  
National Women's Law Center  
Oasis Legal Services  
Oklahomans for Equality  
PFLAG National  
Phoenix Pride  
PowerOn, a program of LGBT Technology Institute  
Resource Center  
TransAthlete.com  
Transgender Resource Center of New Mexico  
URGE: Unite for Reproductive & Gender Equity  
Woodhull Freedom Foundation