



**National  
Urban League**

*Empowering Communities.  
Changing Lives.  
For An Equitable Future.*



March 20, 2023

The Honorable Shalanda D. Young  
Director  
Office of Management and Budget  
New Executive Office Building  
Washington, DC 20503

Dear Director Young:

On behalf of the National Urban League and the NALEO Educational Fund, we would like to request an **additional 90 days** to respond to OMB's initial proposal for updating the race and ethnicity standards. As organizations seeking to support the civil rights of Black, Latino, and other underserved communities, revision of OMB's race and ethnicity standard is of critical importance to our mission and priorities. Considering the complexity of the issue and the number of questions OMB requests feedback on (25 questions), **we request 90 more days beyond the 75 days provided (comments are due April 12, 2023).**

This extended time is necessary for the following reasons:

1. The elimination of the five Census Advisory Committees on Race and Ethnicity (REAC) which reflected *community* representatives (not National organizations), for each OMB race and Hispanic origin category – African American, American Indian/Alaska Native, Asian, Hispanic and Native Hawaiian/Pacific Islander populations, deprived the Census Bureau of an effective mechanism to receive continuous and timely engagement with our communities. As a result, we now require more time and avenues to provide the Census Bureau with feedback, and for us to synthesize findings, and achieve consensus within and among the various civil rights organizations that represented different communities. Without this additional time to achieve consensus, there is a potential this may hamper the Working Group's ability to finalize its recommendations for SPD 15 by the spring/summer of 2024.
2. There is a need to gain better insight into the Census Bureau's decision-making, research and related operations, including its coding process, especially as it concerns respondents from the Black diaspora. For example, it would be helpful if there is transparency about the process and methodology for tabulating respondents' race for those who check off only Latino or MENA in the combined question. Is the current imputation approach the best method, are others being explored?

3. Finally, while we appreciate the vast research the Census has done that led to the initial OMB proposed race and ethnicity change, a *time-limited consultation with the Census Bureau with key members of both the Black and Latino diasporic communities (i.e., Afro-Latinos)* to engage in deeper learning session about the data, research, and reports is needed. This will allow us to be responsive to the various questions and concerns from our diverse communities on the findings from the 2015 National Content Test and identify potential areas for additional data and analysis as it concerns the combined question, MENA (Middle Eastern or North African), definitions, terminologies, tabulation, and bridging of old standards vs. new standards. For example, there is a need to explore the potential implications of expanding the examples under Black / African American to include examples relevant to Afro-Latinos.

The National Urban League and NALEO Educational Fund have hosted conversations, townhalls, and engaged in countless hours of discussions with other civil rights organizations and partners to unpack the research and receive feedback from our community, read reports and articles, and started drafting responses to the 25+ questions from the FRN. Given what civil rights organizations are engaged in to protect civil and human rights and ensure democracy remains, it is critical that more time be provided to delve deeper into the research, hear from our diverse communities, and seek a path toward consensus with our partners. We believe this consensus building will be instrumental if the proposed standards move forward and enter an implementation stage. Providing additional time at this initial stage is necessary to meet this goal. Revising the race and ethnic standards is urgent and want to ensure it is not rushed to the detriment of consensus building, understanding the research, and hearing from our communities.

Sincerely,



Marc H. Morial  
President and Chief Executive Officer  
National Urban League



Arturo Vargas  
Chief Executive Officer  
NALEO Educational Fund

cc: Secretary Gina Raimondo, U.S. Department of Commerce  
cc: Director Robert L. Santos, U.S. Census Bureau