

March 1, 2022

The Honorable Shalanda D. Young
Acting Director, Office of Management and Budget
and
The Honorable Dominic Mancini
Acting Administrator, Office of Information and Regulatory Affairs
Executive Office of the President
Washington, DC 20503

Dear OMB Acting Director Young and OIRA Acting Administrator Mancini:

The undersigned organizations, which include civil rights, community, civic, academic, philanthropic, business, and other public and private sector groups, and individuals, are writing to urge the Office of Management Budget (OMB) to move forward expeditiously with the “unfinished business” of revising the standards for federal data on race and ethnicity. We believe this revision is critical to ensuring that the U.S. Census Bureau can fulfill its mission to produce full, fair, and accurate data on our nation’s population and economy. The revision is also essential for the Administration’s efforts to improve our federal data collection infrastructure and advance equity in federal action.

In 2014, OMB formed an Interagency Working Group (the “Working Group”) consisting of representatives of cabinet departments and other agencies to collaborate on a shared research agenda to improve federal data on race and ethnicity. OMB recognized that the ways in which the people in the United States self-identify their race and ethnicity had evolved since the last revision of the race and ethnicity standards in 1997. The Working Group’s efforts were intended to ensure that measures of race and ethnicity would remain relevant for policy making purposes. The Working Group identified four areas where further revision of the standards would improve the quality of race and ethnicity data collected by the federal government:

1. The use of a combined question versus separate questions to measure race and ethnicity and question phrasing as a solution to race/ethnicity question nonresponse;
2. The classification of a Middle Eastern and North African (MENA) group and distinct ethnic reporting category;
3. The description of the intended use of minimum reporting categories; and
4. The salience of terminology used for race and ethnicity classifications and other language in the standard.

One of the primary reasons the OMB must revive its work to revise the race and ethnicity standards is that the revision is a prerequisite to modernizing the questions the Census Bureau uses in its questionnaires for the decennial Census, including the American Community Survey (ACS). The Bureau has conducted research since at least 2010 which indicates that the wording and format of the separate race and ethnicity questions does not align with how many residents of our nation self-identify, and results in inaccurate or incomplete Census data. The Bureau has set forth its recommendations for the modernization of these questions, but it cannot move forward unless the OMB standards are revised expeditiously to allow for updated questions to be included as soon as possible in the ACS, as well as in the 2030 Census.

In this connection, we wish to highlight our recommendations for revisions that would provide the most full, accurate and complete data on our nation's diverse population groups:

The Latino population

- Replace the use of separate questions on Hispanic origin and race with one combined question on race and ethnicity, which includes Latinos as one of the categories, accompanied by detailed checkboxes for Latino national origin and sub-groups. The Census Bureau's research indicates that the existing approach decreases Latino nonresponse to the race question and significantly reduces the number of Latinos who identify as "Some other race," a category not included in the OMB standards. The results of Census 2020 demonstrate the on-going challenges presented by the separate question approach given that "Some other race" is now the second-largest racial group in the nation.
- Ensure that the collection of data on Latinos allows for Latinos to indicate more than one national origin or sub-group.

The Asian American and Native Hawaiian and Pacific Islander (NHPI) populations

- In revising the standards, the most important needs for Asian American and NHPI communities are maintaining or improving the detailed reporting for all groups achieved previously and ensuring the accuracy of the data collected as these data are essential to informed public policy for our communities.
- Issue specific guidelines for the collection of detailed Asian race and ethnicity data that adopts the 2015 National Content Test (NCT) recommended format, which includes separate checkboxes for Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese, and an "other Asian" category that includes additional examples of Pakistani, Cambodian, and Hmong.
- Issue specific guidelines for the collection of detailed Native Hawaiian or Pacific Islanders race and ethnicity data that adopts the 2015 NCT recommended format, which include as separate checkboxes Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, and an "other Pacific Islander" category, with Palauan, Tahitian, and Chuukese, etc. listed as "for example" write-in groups.
- Remove "Other" from the category "Native Hawaiian or Other Pacific Islander."
- Emphasize that these standards are the minimum categories and that federal agencies can and **should** continue to go beyond them in their data collection.

The Middle East and North African Population (MENA)

- Add a separate ethnic reporting category as part of a combined question on race and ethnicity for persons with origins in the Middle East and North Africa (MENA) region. MENA ethnic category must become a required minimum reporting category. Further, to allow for accurate self-identification, the category must be an ethnic one as people from MENA identify with different racial backgrounds.
- Adopt a comprehensive geographical definition of the MENA category that includes persons with origins in the League of Arab States (Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen), Non-Arab MENA states (Iran, Israel, and Turkey), and Trans-national communities (Assyrians/Chaldeans, Kurds, Berber/Amazigh).

- Issue guidelines for the collection of detailed MENA ethnicity data that treats the MENA region as one diverse geographical area and that sub-boxes be assigned to the largest groups by population in the U.S. (e.g., Lebanese, Iranian, Egyptian), while also using examples that include a trans-national group (e.g., Assyrian/Chaldean), a Gulf population (e.g., Iraqi, Yemeni) and an Arabic-speaking country in Sub-Saharan Africa (e.g., Sudan, Somalia).
- The Census Bureau has long acknowledged the undercount of people from the MENA region and has been a partner in finding a remedy. In 2017, both a Census Bureau career staff memorandum to the Census Director and the Working Group interim report stated that a Combined Question format and the addition of MENA category would result in improved data collection. It is important for OMB to move the process forward now so that we can resume where we left off in 2017 before the previous administration's politicization of the decennial census ignored years of research and testing and upended the significant progress made.

The Black and African American Populations

- Ensure that the collection of data on the Black population allows for Black immigrant populations to indicate more than one national origin or sub-group.
- Ensure that diverse Black, African American populations from the African diaspora have equal opportunities (via check boxes *and* examples) to self-identify.

The undersigned organizations and individuals share this Administration's commitment to collecting high quality federal statistics on race and ethnicity, and improving our federal data collection infrastructure to advance equity in federal action. These improvements would significantly enhance the quality of data used by scores of decision-makers in the public and private sector, leading to more sound public policy and greater economic prosperity. To achieve these important goals, we urge the OMB to take swift action to revive the revision of the federal data standards, consistent with the recommendations set forth above, and we look forward to working with the OMB to move this important effort forward.

Sincerely,

cc: Office of Ms. Alondra Nelson and Mr. Clarence Wardell, III, Equitable Data Working Group, White House Domestic Policy Council
Director Robert Santos, U.S. Census Bureau