



April 27, 2023

Office of the U.S. Chief Statistician
Office of Information and Regulatory Affairs
Office of Management and Budget
1800 G Street, 9th Floor Washington, D.C. 20503

Re: Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards (88 FR 5375)

Dear Office of the U.S. Chief Statistician:

The undersigned 58 organizations, representing a diverse spectrum of [state and local advocacy and direct services] organizations welcome the opportunity to submit comments on the initial proposals for updating OMB's Race and Ethnicity Statistical Standards. As the nation continues to rapidly diversify, government agencies can best understand, and effectively address, the needs of diverse communities through accurate and standardized race and ethnicity data collection and reporting. Ensuring strong federal data collection and reporting standards are particularly important for Asian Americans, Native Hawaiians, and Pacific Islanders (NHPs). According to the 2020 Census, these groups comprise of almost 24 million people who can trace their heritage to more than 50 different countries and who speak over 100 different languages. The federal government is often the primary source of detailed, disaggregated data on these communities.

Having access to detailed, disaggregated data is critical because Asian Americans and NHPs can diverge significantly across key social and economic indicators. For example, only 6.4% of Filipinos and 7.0% of Asian Indians have less than a high school diploma in comparison to 30.3% of Cambodians, 25.0% of Vietnamese and 48.1% of Burmese. Less than a quarter of Asian Indians, Filipinos, Japanese, Pakistanis and Sri Lankans are Limited English Proficient (i.e., speak English “less than very well”), while 47.3% of Vietnamese, 59.1% of Burmese, and 41.5% of Chinese are Limited English Proficient. Asian Americans without health insurance include 10.4% of Laotians, 11.2% of Thai, and 12.5% of Nepalese compared with 3.5% of Japanese and 4.0% of Taiwanese. For NHPs, 19.8% of Micronesians speak English less than “very well,” while only 3.7% of Native Hawaiians do. Similarly, 17.3% of Micronesian families live in poverty, while only 8.2% of Native Hawaiian families do. These statistics underscore the importance of the type of detailed race and ethnicity data collected by federal departments.

Because of the data needs for our communities, we offer the following principles to guide OMB’s revision to its standards and our recommendations.

- **Principle of Self-identification:** In order for data to properly reflect our nation’s population, it is essential that individuals have choices that allow them ample and clear opportunity to express their self-identity as accurately and completely as possible, including selecting one or more races and one or more ethnicities.
- **Principle of Disaggregated Data:** Broad racial and ethnic categories do not allow for a full understanding of our populations. Aggregated data disguises underlying trends that can illuminate needed policy remedies and show where progress is occurring. Federal agencies must be required to collect detailed race and ethnicity data.

Guided by these principles, we issue the following recommendations:

Recommendation 1: Require the collection of detailed race and ethnicity categories by default and adopt the recommendations reflected in [Figure 2](#) as it relates to Asian American and NHPI subcategories

We support the initial proposal to require all federal departments and agencies to collect, analyze, use, report and disseminate disaggregated data as a default. OMB could implement a process by which an agency can receive an exemption after demonstrating that the potential benefit of the detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality. The burden should be on the agency to explain why the “additional burden” outweighs the important benefits to government programs, communities, researchers, and advocates collecting, analyzing, using, reporting and disseminating detailed data.

We believe that federal agencies should be required to collect detailed race and ethnicity data even when such data cannot be responsibly reported due to statistical reliability and confidentiality concerns. Ensuring collection of that data, even if not reportable in the moment, allows for the option to aggregate the data across time for the same group (i.e., pool the responses across a period of time). This can address statistical reliability and confidentiality concerns and provide the granular data needed.

In particular, we believe that the standards should require the collection of detailed data on Chinese, Filipino, Asian Indian, Vietnamese, Korean, and Japanese, with Pakistani, Cambodian, and Hmong listed as “for example” write-in groups. The standards should also require the collection of detailed data on Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, with Palauan, Tahitian, and Chuukese, etc. listed as “for example” write-in groups (see Figure 2 in Federal Register Notice). This approach performed the best in research conducted by the Census Bureau prior to the 2020 Census. This is critical for understanding which Asian American, Native Hawaiian, and Pacific Islander groups are being served by agencies and which are underserved. We also believe ongoing research into the best groups to use for checkboxes and examples is important to ensure that the most up to date information is being used to serve our communities. Moreover, we ask for further study into how to best frame the questions so as to utilize the most effective language and instructions possible.

Recommendation 2: Adopt a combined race and ethnicity question

Previous Census Bureau research provides evidence of maximizing response rates to race and ethnicity questions by combining them into one question. Asian Americans, Native Hawaiians, and Pacific Islanders self-identified more often when they were posed a question that presented combined race and ethnicity. (See *2015 National Content Test Race and Ethnicity Analysis Report*, Table H31, pg. 299, <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>). In addition, we recommend that there should always be:

- A maximum number of checkboxes included, with the number used during the 2020 Census serving as a minimum;
- A maximum number of examples, with the number used during the 2020 Census serving as a minimum; and
- NHPI response options clearly identified as separate from Asian American response options.

Recommendation 3: Add a Middle Eastern and Northern African (MENA) Category

We support the recommendation of advocates in the MENA community to have a distinct reporting category for the community. Research from the Census Bureau indicates that the addition of a new, geographically-based category for individuals of MENA origin would more accurately reflect the way many individuals of MENA origin self-identify. Since MENA populations identify with different racial categories, MENA should be added as a distinct ethnic category within the combined question. In addition, MENA ethnicities should be removed from the current definition of the White category. As with other race and ethnic categories under a combined question, the MENA category should also include checkboxes and write-in space for identification with detailed subgroups. We urge OMB to establish the new MENA category in revising the standards and to work closely with advocates for all relevant communities to achieve a consensus on the nationalities and transnational groups that should be included in the definition of a MENA category.

Recommendation 4: Updating terminology for the Standards

We strongly agree with the initial proposals to:

- remove “Far East” from the Asian definition, and replacing it with “East Asian”
- remove “Other” from “Native Hawaiian and Other Pacific Islander”
- discontinue the use of the terms “majority” and “minority.”

Recommendation 5: When race and ethnicity data are presented, it should include all racial and ethnic categories and OMB should end the use of “All Other Races” as a designation in the standards

As the diversity of the U.S. continues to increase, we believe that OMB needs to revise how data are presented on diverse communities. OMB must revise their terminology to recognize the breadth of racial and ethnic communities comprising the American public today and to better represent all communities. To that end, we believe it is a necessary and critical step for OMB to end the use of an “All Other Races” category in the standards. Demographics have significantly changed over the past twenty years. Asian Americans and NHPs continue to consistently be among the fastest growing groups in the United States. These communities are often lumped into “All Other Races,” thereby making these fast-growing communities invisible. The practice moving forward should be to have agencies report on the data for, at a minimum, all racial and ethnic categories, with the addition of data on detailed groups as available.

We thank OMB for the opportunity to comment on the initial proposals to update OMB's Race and Ethnicity Statistical Standards. As indicated in our comments, these standards and need for revisions are critical to ensuring that federal departments and agencies understand the needs of diverse communities and are able to effectively meet their obligations. Now is the time for these long overdue revisions to be made. If you have any questions, please reach out to Terry Ao Minnis, Senior Director of Census and Voting Programs at Asian Americans Advancing Justice – AAJC at tminnis@advancingjustice-aaic.org or 202 815-4412.

Sincerely,

APHA - Asian Pacific Islander Caucus
Asian & Pacific Islander Caucus for Public Health
Asian American Federation of Florida - South Region
Asian American Organizing Project
Asian American Studies Program, University of Maryland, College Park
Asian Americans Advancing Justice – AAJC
Asian Americans United
Asian and Pacific Islander American Vote (APIAVote)
Asian Caribbean Exchange
Asian Community & Cultural Center
Asian Community Development Corporation
Asian Community Development Council
Asian Girls Ignite
Asian Law Alliance
Asian Pacific Community in Action
Asian Pacific Development Center
Asian Services In Action (ASIA)
Association of Baltimore Chinese
Boston Chinatown Neighborhood Center

Chinese Progressive Association, Boston MA
Colorado Asian Pacific United
CORE: Community Organizing for Radical Empathy
Empowering Pacific Islander Communities
Florida Asian Services
Hamkae Center
Hmong American Partnership
Hmong National Development
Inst.for Asian American Studies (IAAS) U. of MA. Boston
Island Liaison, Inc.
Japanese American Citizens League
Korean Association of the State of Maryland
Laotian American National Alliance
League of Women Voters of the United States
Main Line Chinese Culture Center, Inc.
Micronesian Islander Community
MinKwon Center for Community Action
Missouri Asian American Youth Foundation
National Asian Pacific American Bar Association (NAPABA)
National Council of Asian Pacific Americans (NCAPA)
National Federation of Filipino American Associations (NaFFAA)
National Immigration Law Center
National Network for Arab American Communities (NNAAC)
National Tongan American Society
NCAAT in Action
Network of Myanmar American Association
New Mexico Asian Family Center
North Carolina Asian Americans Together (NCAAT)
OCA South Florida Chapter
OCA-Asian Pacific American Advocates
One APIA Nevada
OPAWL - Building AAPI Feminist Leadership
Pacific Island Knowledge 2 Action Resources (PIK2AR)
Papa Ola Lokahi
South Asian American Policy and Research Institute (SAAPRI)
South Asian Public Health Association
The Asian American Foundation
VAYLA New Orleans
Woori Juntos