

March 4, 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 do 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 proposed 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 adopt 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 adopt 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.

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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,

#### Organizations:

American Civil Liberties Union  
American Muslim Empowerment Network (AMEN)  
American-Arab Anti-Discrimination Committee (ADC)  
Americans for Financial Reform Education Fund  
Arab American Association of New York

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Arab American Civic Council  
Arab American Institute  
Armenian-American Action Network  
Asian & Pacific Islander American Health Forum  
Asian American Legal Defense and Education Fund (AALDEF)  
Asian Americans Advancing Justice - AAJC  
Asian Americans Advancing Justice - Los Angeles  
Asian and Pacific Islander American Vote (APIAVote)  
Asian Pacific American Labor Alliance, AFL-CIO  
Association of Asian Pacific Community Health Organizations (AAPCHO)  
Association of Population Centers  
Association of Public Data Users (APDU)  
Bend the Arc: Jewish Action  
Bing Wang (Tipping Point Community)  
Black Alliance for Just Immigration  
California Black Census and Redistricting Hub  
California Center for Population Research  
California Community Foundation  
CAPIUSA  
Caribbean Community Service Center (CCSC)  
Central American Resource Center  
Central Valley Islamic Council  
Common Cause  
Common Cause MN  
Common Cause PA  
Consortium of Social Science Associations  
COPAFS  
Council on America Islamic Relations  
Council on Foundations  
Crescent City Media Group/Center for Civic Action  
Detroit Change Initiative  
Disability Rights Education and Defense Fund (DREDF)  
Economic Policy Institute  
Education Law Center-PA  
Empowering Pacific Islander Communities (EPIC)  
Equality California  
Ethnic Media Services  
Fair Count  
Fayetteville Police Accountability Community Taskforce  
First 5 Alameda  
Forefront (Illinois)

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Funders' Committee for Civic Participation  
Future Endeavors Life Program  
GALEO LCDF/GALEO Impact Fund  
Gang Free Inc.  
Georgetown Center on Poverty & Inequality  
Geraldine R. Dodge Foundation  
GreenLatinos  
Helping All People Excel, Inc.  
Hispanic Federation  
Houston Endowment  
Houston Immigration Legal Services Collaborative  
ICNA Council for Social Justice  
Inter-Faith Committee on Latin America  
International Rescue Committee  
Inter-university Consortium for Political and Social Research  
Islamic Center of Detroit  
Islamic Civic Society of America  
Islamic Cultural Center of Fresno  
Japanese American Citizens League  
Justice in Aging  
Labor Council for Latin American Advancement  
Latino Community Foundation  
Lawyers' Committee for Civil Rights Under Law  
Lawyers for Civil Rights (LCR)  
League of United Latin American Citizens (LULAC)  
League of Women Voters of the United States  
Louisiana Advocates for Immigrants in Detention  
MACS - Minnesotans for the American Community Survey  
MALDEF  
MANA, A National Latina Organization  
Mi Familia Vota  
Michigan Nonprofit Association  
Movement Advancement Project  
Muslim American Society  
NAACP Charlotte- Mecklenburg Branch  
NALEO Educational Fund  
Nariah's Way Foundation  
National Action Network  
National Asian American Pacific Islander Mental Health Association  
National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE)  
National Community Action Partnership

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National Council of Asian Pacific Americans  
National Council of Churches  
National Education Association  
National Employment Law Project  
National Immigration Law Center  
National Latinx Psychological Association  
National Network for Arab American Communities (NNAAC)/Arab Community Center for  
Economic and Social Services (ACCESS)  
National Urban League  
National Women's Law Center  
NC Counts Coalition  
New Labor  
New Michigan Media  
NineFold, LLC  
North Carolina Asian Americans Together  
North Carolina Coalition - National Council of Negro Women, Inc.  
Palestinian American Community Center, Inc.  
Pars Equality Center, Los Angeles  
Partnership for the Advancement of New Americans  
Pennsylvania Partnerships for Children  
Pillsbury United Communities  
PolicyLink  
Poligon Education Fund  
Population Association of America  
Population Reference Bureau  
Prison Policy Initiative  
Project 70Forward  
Public Wise  
Reproaction  
RESULTS  
Shackle Free Community Outreach Agency, Inc.  
Sikh American Legal Defense and Education Fund (SALDEF)  
Silver State Equality-Nevada  
Simply Put  
Southwestern Michigan Urban League  
Texas Border Coalition  
Texas Census 2030  
TFBU Foundation  
The Colorado Health Foundation  
The Economic Security & Opportunity Initiative at the Georgetown Center on Poverty &  
Inequality  
The Education Trust  
The Fund for New Jersey

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The Horner Foundation  
The Leadership Conference on Civil and Human Rights  
The Micah Project  
The Trevor Project  
Twin Cities Research Group  
U2U  
UnidosUS  
United States Hispanic Chamber of Commerce  
United States Hispanic Leadership Institute  
United Way of Passaic County  
University of Texas at Austin  
VietLead  
Voto Latino  
Welcoming America  
Women Employed

Individuals:

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Danah Boyd  
Rev. Dawn Daly-Mack, RN  
Karin Mac Donald  
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Fontane Lo, Blue Shield of California Foundation  
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Marcy Kaplan  
Terri Ann Lowenthal, Former Staff Director, House Subcommittee on Census, Statistics, and  
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Bryan Malong, Learning & Evaluation Manager, Tipping Point Community  
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Della Owens  
Frankie Denise Powell  
Katie Campbell Simons  
Jane Wellenkamp, PhD  
May Yang, Minnesota Council on Foundations

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