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.

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

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)

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

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

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:

Jamie Austin
Gary D. Bass, Affiliated Professor, Georgetown University
Danah Boyd
Rev. Dawn Daly-Mack, RN
Karin Mac Donald
Sonjia Lee
Fontane Lo, Blue Shield of California Foundation
Frank W. Heiland, Associate Director of the CUNY Institute for Demographic Research
Marcy Kaplan
Terri Ann Lowenthal, Former Staff Director, House Subcommittee on Census, Statistics, and
     Personnel
Bryan Malong, Learning & Evaluation Manager, Tipping Point Community
Supriya Misra
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