

April 28, 2017

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: OMB-2016-0008, Proposals from the Federal Interagency Working Group for Revision of the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity**

Dear Office of the U.S. Chief Statistician:

The undersigned 247 organizations, representing a diverse spectrum of health, justice, civil rights and social services organizations welcome the opportunity to submit comments on potential changes to the Office of Management and Budget's (OMB) Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. As the nation continues to diversify and the population approaches majority-minority in 2044, accurate and standardized data collection and reporting of race and ethnicity is critical to ensuring that federal departments and agencies understand the needs of diverse communities and are able to effectively meet their obligations to serve the American people. Data collection and reporting is particularly salient for Asian American, Native Hawaiian and Pacific Islanders (AAs and NHPs) who comprise over 20 million people, trace their heritage to more than 50 different countries and speak over 100 different languages.

AAs and NHPs can differ dramatically across key social and economic indicators. For example, while only 6% of Filipino Americans nationwide live below the poverty line, approximately 26% of Hmong Americans are poor. Similarly, about 49% of Marshallese lives below the poverty line, while only 5% of Fijians are poor. Roughly 73% of Taiwanese Americans hold a bachelor's degree, yet only 12% of Laotian Americans do. Similarly, about 18% of NHP adults have a bachelor's degree, with about 3% of Marshallese compared to 18% of Native Hawaiians having bachelor's degrees. These data points underscore the importance of the type of detailed race and ethnicity data collected by federal departments. For these reasons, we issue the following recommendations:

**Recommendation 1: Adopt the recommendations of the Census Bureau 2015 National Content Test for Proposed Additional Minimum Race and Ethnicity Categories**

We strongly urge OMB to require all federal departments and agencies to collect, analyze, use, report and disseminate disaggregated data for Chinese, Filipino, Asian, Indian, Vietnamese, Korean, and Japanese, with Pakistani, Cambodian, and Hmong listed as "for example" write-in groups, and for Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, with Palauan, Tahitian, and Chuukese, etc. listed as "for example" write-in groups (U.S. Census Bureau, 2015 National Content Test Race and Ethnicity Analysis Report, Figure 26). This is critical for understanding which Asian, Native Hawaiian and Pacific Islander groups are being served by agencies and which are underserved.

All federal departments and agencies should be required to collect, analyze, use, report, and disseminate data at these more granular levels. To that end, we believe that federal agencies should be required to collect detailed race and ethnicity data even when such data can not be responsibly reported due to statistical reliability and confidentiality concerns. This is so that we have the option to aggregate the data across time for the same group, (i.e., pool the responses across a period of time), which can address statistical reliability and confidentiality concerns.

In addition, this notice asks for comments on the costs and benefits of disaggregating data. We believe that the important benefits to government programs, communities, researchers, and advocates deeply outweigh any costs and burdens to implementing agencies.

**Recommendation 2: Adopt a combined race and ethnicity question.**

The Census Bureau's 2015 National Content Test provides evidence for maximizing the response rates to race and ethnicity questions through changes in phrasing. Asians and Native Hawaiians and Pacific Islanders self-identified more often when they were posed a question that presented combined race and ethnicity. (NCT Final Results Test Table, H 31, pg 299). In addition, we recommend that regardless of the format used, there should be:

- A maximum number of checkboxes included, with the number used during the 2010 Census serving as a minimum
- A maximum number of examples, with the number used during the 2010 Census serving as a minimum
- NHPI response options should be 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 distinct reporting categories for the community. Current OMB guidelines that classify persons from the MENA region as white by race are not accurate or useful, and confuse survey respondents as well as government and other agencies tasked with collecting information on and providing services to these populations. NCT results show that when a distinct MENA category was present, there was a significant decrease in responses for all other response categories, including a significant decrease in "Some Other Race" responses. Therefore, we urge OMB to establish the new MENA category in revising the standards.

**Recommendation 4: Change the terminology for Native Hawaiians and Pacific Islander Populations.**

We strongly urge changing the terminology in the standards to "Native Hawaiian and Pacific Islanders" rather than the current "Native Hawaiian and Other Pacific Islander." We developed this position with the Native Hawaiian & Pacific Islander Alliance as the term "Native Hawaiian and Other Pacific Islander" has fallen out of favor.

**Recommendation 5: Remove the term "Far East" and "Negro" from the standards.**

We support the recommendations to remove the terms "Negro" and "Far East" from the current standards.

**Recommendation 6: When race and ethnicity data is presented, it should include all racial and ethnic categories and OMB should adopt the proposal to 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 is presented on diverse communities as well as aligning terminology to recognize the breadth of racial and ethnic communities comprising the American public today and strive to reflect the importance of 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 are the fastest growing race group in the United States, with 43% growth between the 2000 and 2010 Censuses. The NHPI population also grew rapidly between 2000 and 2010, at 35%, more than three times faster than the U.S. population as a whole. 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.

In summary, we thank OMB for the opportunity to comment on potential revisions to the 1997 data collection standards for race and ethnicity. 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. As such, we recommend that OMB provide the public an opportunity to comment on any final changes recommended for adoption.

Sincerely,

## **National Organizations**

9to5, National Association of Working Women  
ACRIA  
AIDS United  
Alliance for Strong Families and Communities  
American Association of University Women (AAUW)  
American Civil Liberties Union  
AMERICAN LUNG ASSOCIATION  
Asian & Pacific Islander American Health Forum  
Asian & Pacific Islander American Scholarship Fund (APIASF)  
Asian & Pacific Islander Caucus for Public Health  
Asian American Legal Defense and Education Fund (AALDEF)  
Asian American Psychological Association  
Asian Americans Advancing Justice - AAJC  
Asian and Pacific Islander American Vote (APIAVote)  
Asian Pacific American Institute for Congressional Studies  
Asian Pacific American Labor Alliance, AFL-CIO (APALA)  
Asian Pacific Islander American Health Forum  
Asian Pacific Partners for Empowerment, Advocacy and Leadership (APPEAL)  
Association of Asian Pacific Community Health Organizations (AAPCHO)  
Association of State Public Health Nutritionists  
Auxiliary to the National Medical Association, Inc.  
BPSOS  
Bread for the World  
Center for Asian American Media  
Center for Responsible Lending  
CFED  
Coalition for Juvenile Justice  
Coalition on Human Needs  
Disability Rights Education & Defense Fund  
East Coast Asian American Student Union (ECAASU)  
Economic Policy Institute  
Fair Elections Legal Network  
Families USA  
Fetal Alcohol Syndrome Information Network  
First Focus  
Healthy Children Project  
Hep B United  
Hepatitis B Foundation  
Immunization Action Coalition

Iranian American Bar Association  
Japanese American Bar Association  
Japanese American Citizens League  
Khmer Health Advocates  
Laotian American National Alliance  
March of Dimes  
NAACP  
NAPAFASA  
NASTAD  
National Asian Pacific American Bar Association  
National Asian Pacific American Women's Forum (NAPAWF)  
National Asian Pacific Center on Aging  
National Association of Community Health Centers  
National Association of Social Workers  
National Birth Equity Collaborative  
National Black Justice Coalition  
National Coalition for Asian Pacific American Community Development  
National Coalition for the Homeless  
National Collaborative for Health Equity  
National Congress of American Indians  
National Council of Asian Pacific Americans (NCAPA)  
National Council of Asian Pacific Islander Physicians  
National Education Association (NEA)  
National Federation of Filipino American Associations (NaFFAA)  
National Health Law Program  
National Institute for Reproductive Health  
National Japanese American United Methodist Clergy Caucus  
National Korean American Service & Education Consortium (NAKASEC)  
National LGBTQ Task Force  
National Medical Association  
National Org of API Ending Sexual Violence  
National Organization for Women  
National Organization of API Ending Sexual Violence  
National Partnership for Women & Families  
National Queer Asian Pacific Islander Alliance (NQAPIA)  
NETWORK Lobby for Catholic Social Justice  
NMAC  
OCA - Asian Pacific American Advocates  
Papa Ola Lokahi  
PIVOT - The Progressive Vietnamese American Organization  
Prevention Institute

Prison Policy Initiative  
Progressive Hmong American Organizers (PHAO)  
Project Inform  
Sexuality Information and Education Council of the U.S. (SIECUS)  
Sikh American Legal Defense and Education Fund (SALDEF)  
South Asian Americans Leading Together  
South Asian Bar Association of North America  
Southeast Asian Resource Action Center  
Southern Coalition for Social Justice  
Teach For America  
The Arc of the United States  
The Center for Asian Pacific American Women  
The Children's Partnership  
Union for Reform Judaism  
Union of North American Vietnamese Student Association  
URGE: Unite for Reproductive & Gender Equity  
YMCA of San Francisco  
YWCA USA

### **State and Local Organizations**

Advancement Project California  
Alliance of Rhode Island Southeast Asians for Education  
API Council of San Francisco  
API Forward Movement  
Arkansas Coalition of Marshallese  
Asian & Asian American Studies Certificate Program, UMass Amherst  
Asian American Bar Association of Ohio  
Asian American Federation  
Asian American Federation of Florida  
Asian American Federation of Florida - South Region  
Asian American Health Coalition dba HOPE Clinic  
Asian American Health Coalitions dba HOPE Clinic  
Asian American Pacific Islander Health Research Group (AAPIHRG)  
Asian American Research Center on Health (ARCH)  
Asian American Resource Workshop  
Asian American Studies Program, University of Maryland, College Park  
Asian Americans for Community Involvement  
Asian Americans United  
Asian Community Development Council  
Asian Counseling and Referral Service

Asian Festival Corporation  
Asian Health Services  
Asian Law Alliance  
Asian Pacific American Bar Association of Pennsylvania  
Asian Pacific Development Center  
Asian Pacific Islander Coalition - Yakima County  
Asian Pacific Policy & Planning Council (A3PCON)  
Asian Services In Action  
Asian/Pacific Bar Association of Sacramento  
Auxiliary to the Medio-Chirurgical Society of the District of Columbia, Inc.  
Barangay Community Services-Tacoma  
Black Women For Wellness  
Boston Alliance for Community Health  
California Hepatitis Alliance  
California Immigrant Policy Center  
California Pan-Ethnic Health Network  
Cambodian Association of America  
Cambodian Association of Greater Philadelphia  
Cambodian Society of Rhode Island  
Canvasback Missions, Inc.  
Center for Pan Asian Community Services, Inc. (CPACS)  
Charles B Wang Community Health Center  
Children Now  
Children's Trust of SC  
Chinese Culture Center of San Francisco  
Chinese Progressive Association - Boston  
CHOW Project  
Coalition of Asian American Leaders  
COFA Alliance National Network  
Commonwealth Healthcare Corporation  
Community Parent Resource Center of Northwest Arkansas  
CSUF Asian American Studies Program  
CT Commission on Equity and Opportunity  
Design Capital Asia  
Donaldina Cameron House  
Economic Opportunity Agency of Washington County, Inc.  
EMBARC  
Endeavor Foundation  
Fairfax Education Association  
Fathers & Families of San Joaquin  
Filipino American Lawyers of San Diego

FILIPINO AMERICAN SERVICE GROUP, INC. (FASGI)  
Florida Chinese Federation  
Freedom Inc  
Full Circle Project  
Georgia Coalition for the Peoples' Agenda  
Hana Center  
Health Disparities Institute  
Hep Free Hawaii  
Hepatitis Education Project  
Hepatitis Foundation International  
Impetus - Let's Get Started LLC  
Independent freelance writer  
Interlm Community Development Association  
Japantown Prepared!  
J-Sei, Inc.  
Kansas Action for Children  
Kokua Kalihi Valley Comprehensive Family Services  
Korean American Association of Greater Austin  
Korean Community Center of the East Bay  
Korean Community Services  
Korean Community Services of Metropolitan New York, Inc.  
Korean Resource Center  
Lana'i Community Health center  
Lao Assistance Center of Minnesota  
Lao Volunteer Donation Association  
Little Tokyo Service Center  
Maine Children's Alliance  
Manavi  
Marshallese Community Organization  
Marshallese Educational Initiative  
Massachusetts Immigrant and Refugee Advocacy Coalition  
MayView Community Health Center  
Medico-Chirurgical Society of the District of Columbia, Inc.  
Micronesia Coalition  
MinKwon Center for Community Action  
Minnesota Public Interest Research Group  
Monsoon United Asian Women of Iowa  
MQVN Community Development Corporation  
NANAY CEDC  
NAPAWF-Philly  
National Tongan American Society

Network of Asian American Association  
New American Pathways  
New Mexico Asian Family Center  
NICOS Chinese Health Coalition  
NOELA Community Health Center  
North Central Regional Mental Health Board  
North East Medical Services  
Office of Public Engagement, City of Philadelphia  
Ohio Asian American Health Coalition  
Ohio Progressive Asian Women's Leadership  
Oregon Asian Pacific American Bar Association  
Pacific Asian Counseling Services  
Pacific Islander Health Partnership  
PACS  
Philadelphia South Asian Collective  
Pradeepta Upadhyay  
Progressive Asian Network for Action  
Providence Youth Student Movement  
Quincy Asian Resources, Inc (QARI)  
Refugee & Immigrant Services Northwest  
Richmond Area Multi-Services, Inc.  
Sacramento Area S.T.O.P. Hepatitis Task-Force  
SAIVA  
San Francisco AIDS Foundation  
SEAMAAC  
Services, Immigrant Rights, and Education Network (SIREN)  
Southeast Asian Coalition  
Summit Health Institute for Research and Education, Inc. (SHIRE)  
Talakeiola Enterprise  
Thai Community Development Center  
The Cambodian Family  
UCSF  
UMass Lowell, Center for Asian American Studies  
Usiloquy Dance Designs  
United Cambodian Community  
University of Massachusetts  
Vietnamese American Bar Association of Georgia  
Vietnamese American Bar Association of Southern California  
Vietnamese American Initiative for Development (VietAID)  
Vietnamese Youth Development Center  
Voices for Virginia's Children



Waikiki Health (FQHC)

Waimanalo Health Center

Washington State Department of Health

Young Women United