

EPI's comments on initial proposals for updating race and ethnicity statistical standards

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Bob Sivinski

Chair, Interagency Technical Working Group on Race and Ethnicity Standards

Office of Management and Budget (OMB)

725 17th St., NW

Washington, DC 20503

Re: Initial Proposals for Updating Race and Ethnicity Statistical Standards (Document No. 2023-01635)

To Whom It May Concern,

The Economic Policy Institute (EPI) is a nonprofit, nonpartisan think tank created in 1986 to include the needs of low- and middle-income workers in economic policy discussions. EPI conducts research and analysis on the economic status of working America, proposes public policies that protect and improve the economic conditions of low- and middle-income workers, and assesses policies with respect to how well they further those goals. EPI submits these comments to the Office of Management and Budget (OMB) on the initial proposal from the Federal Interagency Technical Working Group on Race and Ethnicity Standards to improve the quality and usefulness of federal race and ethnicity data. Specifically, we offer comments on Proposal 1, to collect race and ethnicity information using one combined question, and on Proposal 2, to add “Middle Eastern or North African” (MENA) as a new minimum response category by default.

Race and ethnicity data collected for the Census is utilized by researchers, policymakers, and academics alike to better understand the growing multiracial identity of our country. Accurate data on race and ethnicity is necessary to reveal and address disparate impacts of laws, programs, and policies and to ensure that these policies effectively meet the needs of diverse communities. Ultimately, this data informs

policymakers' efforts to evaluate programs, eliminate disparities, and promote equal opportunities.

Current race and ethnicity standards, last updated in 1997, do not fully reflect the changing demographics of our society and the growth of multiracial and multiethnic communities.¹ The current standards require separate questions on race and ethnicity whenever respondents self-report, which many people find confusing. Respondents are first asked a question about Hispanic origin followed by a separate question on race. Those responding affirmatively to the Hispanic origin question may not see an answer choice on the race question that matches the way they identify and either skip the question or select "Some Other Race." Since 1980, a growing number of people have identified themselves as "Some Other Race" rather than one of the minimum categories listed, making the "Some Other Race" category now the second-largest race group in the country, according to the 2020 Census.

As the category of "Some Other Race" grows into a sizable population group, the resulting data is less helpful for policymaking and research, enforcement of civil rights laws, and identifying and providing needed community services. The two-question format highlights a discrepancy between how people identify themselves and how the information is collected. Consequently, this produces insufficient demographic data.

Under the working group's proposed changes, the Census would shift from the two-question format to a single-question format on race and ethnicity. Census Bureau research conducted during the 2010 Census indicated that a single combined question substantially reduced the selection of "Some Other Race" and improved item nonresponse rates compared with a separate question format.² In 2015, additional research by the Census Bureau provides strong evidence that a single combined question is the most effective approach, leading to more accurate reporting and similar or higher levels of detailed reporting for all major groups.³

The working group also offered a proposal to add a distinct minimum category for individuals to identify as Middle Eastern and North African (MENA). The inclusion of the MENA category is critical to measure discrimination and disparities in services faced by the growing Middle Eastern and North African population in the U.S. Under current standards, MENA populations are categorized as "White." This has rendered people from the MENA region invisible in the data, hampering the ability to provide an adequate level of necessary services to MENA communities, to conduct health research for MENA communities, and to enforce civil rights protections against racial and ethnic discrimination. Further, the MENA category should be an ethnic reporting category, as people from the MENA region can be of different races. Without a MENA category, many people will remain unrepresented due to the limited race and ethnicity options available in the default categories. The Census Bureau's research shows that using a distinct MENA category elicits higher-quality data and allows respondents to report their identities accurately.⁴

We support the Working Group's proposal to shift from the two-question format to a single-question format, and to add a minimum category option for individuals to identify as

MENA. However, to ensure the representation and visibility of all groups, we urge additional focused research and testing, as well as close consultation with community and grassroots leaders, to determine how race and ethnicity standards can continue to be improved. We recognize that changing the design raises the prospect that the count for some races or ethnicities may change—particularly for the Afro-Latino community. Census research indicates that testing of the combined question design with a MENA category and multiple detailed checkboxes found the proportion of Hispanic respondents that identified as Black increased when compared with a single-question format.⁵ However, concerns about erasure as a result of the combined race and ethnicity question may still be present. OMB must collaborate and conduct meaningful consultation to ensure that the implementation of these changes maximizes accurate data collection, addresses important concerns about cultural identity, and elicits feedback from impacted communities for revisions to current and new standards.

As an organization that relies on federal data, accurate measures on race and ethnicity are critical to our work, and we support revisions that allow for the collection of more representative statistics. We also urge OMB to continue to consult with stakeholders to ensure that people of all identities, and particularly those defined as legally protected classes, are recognized and accounted for.

Sincerely,

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Notes

1. U.S. Census Bureau, “Research to Improve Data on Race and Ethnicity,” March 3, 2017. Available at: <https://www.census.gov/about/our-research/race-ethnicity.html>.
2. U.S. Census Bureau, “2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment,” February 28, 2015. Available at: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>.
3. U.S. Census Bureau, “2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment,” February 28, 2015. Available at: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>.
4. U.S. Census Bureau, “2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment,” February 28, 2015. Available at: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>.
5. U.S. Census Bureau, “2015 National Content Test: Race and Ethnicity Analysis Report,” February 28, 2017, page 290, Table H13. Table H15 on page 291 shows this was especially true for paper data collections. Available at <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>.