



October 31, 2016

Katherine K. Wallman  
Chief Statistician  
Office of Management and Budget  
1800 G Street, 9th Floor  
Washington, D.C. 20503  
Submitted via email: race-ethnicity@omb.eop.gov

Re: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity,  
Docket ID OMB-2016-0002-0001

Dear Ms. Wallman:

The National Council of Asian Pacific Americans (NCAPA) appreciates this opportunity to comment on the Office of Management and Budget's (OMB) Federal Register notice regarding the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (Standards). NCAPA, founded in 1996, is a coalition of 35 national Asian American, Native Hawaiian, and Pacific Islander (AANHPI) organizations striving for equity and justice. All too often, AANHPIs are rendered invisible because government data categorizes AANHPIs as "Other" or simply as "Asian American," as if we are a homogenous population. In reality, AANHPIs represent more than 50 subgroups, and our priorities and concerns can be vastly different. Data that is disaggregated by AANHPI ethnicities is critical to understanding our communities' needs and targeting the necessary resources and services.

NCAPA welcomes this review of the Standards, but we also believe it is overdue and **encourage OMB to review the Standards more regularly**—every 10 years, ahead of each decennial Census, rather than every 20 years. While we provide comments on all four topics outlined in the notice, our focus is on the third area, the description of the intended use of minimum reporting categories.

### **Description of the intended use of minimum reporting categories**

NCAPA recognizes the intent of the Standards: to provide a minimum set of racial and ethnic categories for use when Federal agencies are collecting and presenting such information for statistical, administrative, or compliance purposes. We also acknowledge that the language of the Standards states that "the collection of greater detail is encouraged" and appreciate when federal agencies are able to do so.

However, despite this intent and language, some departments and agencies have misinterpreted the Standards as stating that these categories are the only permissible reporting categories, rather than the minimum set of categories. To address this continued under-collection and under-reporting, **NCAPA strongly believes that the Standards must be strengthened and made more explicit:**

- NCAPA supports the recommendation by the Asian & Pacific Islander American Health Forum (APIAHF) that OMB require all federal departments and agencies to collect, analyze, use, report, and disseminate disaggregated data on AA & NHPI populations.
- If this is not feasible, NCAPA also supports the recommendation by the Southeast Asian Resource Action Center (SEARAC) that federal departments and agencies “should” collect, analyze, use, report, and disseminate data in greater (disaggregated) detail.
- Similarly, NCAPA supports the recommendation by Asian Americans Advancing Justice | AAJC and numerous AANHPI co-signing organizations that the Standards explicitly state that the collection of greater detail not only be “encouraged” but that it be “preferred” and that the minimum categories should only be used when the collection and reporting of more detailed data “would create undue hardship to the agency.”
- In order to minimize any such undue hardship, NCAPA supports the recommendation by APIAHF that OMB develop resources and identify best practices to support the efforts of federal departments and agencies to collect, analyze, use, report, and disseminate disaggregated data on AA & NHPI populations. In this regard, NCAPA also supports the recommendations by the National Coalition for Asian Pacific American Community Development (National CAPACD) and APIAHF regarding increased oversampling methodologies and pooling multiple years of data for analysis and reporting.

If OMB does not accept these recommendations, the AANHPI community will continue to be perceived as a homogenous population. This leads to sweeping generalizations—that AANHPIs are the highest-income, best-educated racial group in the country, with few, if any, needs—which in turn promote the “model minority” myth.

The “model minority” myth is used to erase the history of exclusion and discrimination against AANHPIs. It also is used to obscure our concerns—failing to recognize critical differences and priorities between AANHPI subgroups—and therefore to excuse the lack of government resources and philanthropic investments in our communities. Finally, the lack of disaggregated data and the “model minority” myth create a wedge between AANHPIs and other communities of color by pitting the so-called “model minority” against communities that are “not models.”

To combat the “model minority” myth and to provide sufficient information for policymakers to address the priorities and concerns of the AANHPI community, the data collected and reported for AANHPIs must be disaggregated by ethnicity as much and as often as possible. Only then can we build the solid foundation necessary for public policy, ensure that the right programs are reaching the right communities, and dismantle the conscious and unconscious beliefs that there is a racial hierarchy in our nation.

For example, the “model minority” myth focuses on the [51%](#) of Asian Americans over the age of 25 who have a bachelor’s degree or higher level of education (compared to 30% for all Americans over the age of 25). But this figure is only [21%](#) for Native Hawaiians and Pacific Islanders, and there are striking differences in educational attainment [when the data is disaggregated by ethnicity](#): 94% of Japanese Americans have graduated from high school, compared to 81% of Chinese Americans; 71% of Vietnamese, Tongan and Melanesian Americans; and roughly 62% of Cambodian and Hmong Americans.

Another example is pay equity. While AANHPI women are paid an average of 86 cents for every dollar a white man is paid, disaggregated data [demonstrates](#) that, for example, Native Hawaiian women are paid only 66 cents for every dollar a white man is paid; Vietnamese, Laotian, and Samoan American women 61 cents; Burmese American women 53 cents; and Bhutanese American women only 38 cents.

Finally, a Department of Labor [report](#) issued just this month on The Economic Status of Asian Americans and Pacific Islanders shows the necessity of disaggregated data in understanding the AA & NHPI population. Indeed, if the Standards are strengthened and made more explicit—as we have recommended—we believe that more federal departments and agencies will follow the Department of Labor’s lead and be better able to meet the needs of AANHPI communities.

We note that even improved Standards will only be effective if all departments and agencies comply with them—and some have not been able to meet even the current Standards. Therefore, **NCAPA supports APIAHF’s recommendations** that OMB work with departments and agencies to enforce compliance and that all departments and agencies be required to publicly justify any exclusion of the minimum categories.

With respect to the collection and reporting of data for Pacific Islander communities, **NCAPA supports the recommendation by Payu-ta** that Micronesians be disaggregated further to include data for Palauans (Republic of Palau); Marshallese (Republic of Marshall Islands); Chuukese (State of Chuuk, Federated States of Micronesia); Yapese (State of Yap, Federated States of Micronesia); Pohnpeian (State of Pohnpeian, Federated States of Micronesia); and Kosraean (State of Kosrae, Federated States of Micronesia) wherever possible.

### **Salience of terminology used for race and ethnicity classifications and other language in the standard**

**NCAPA strongly urges OMB to add “Asian American” to the category of “Asian.”** In 1997, OMB added “African American” to the category of “Black,” and a similar addition should be made to the category “Asian” today.

As the Federal Register notice states, “while some terminology continues to resonate with group members, other expressions may fall out of favor or take on other meanings.” Some respondents who meet the definition of “Asian” may not self-identify with this terminology—in particular if they were born in the United States—and instead self-identify as “Asian American.” Furthermore, the category “Asian” without “Asian American” takes on another meaning, contributing to the “perpetual foreigner” stereotype—that Asian Americans are not American.

This damaging perception has fueled dark chapters in Asian American history that include the Chinese Exclusion Act and the incarceration of Japanese Americans during World War II and continues today with profiling, discrimination, and hate crimes against Muslim, Sikh, Arab, and South Asian Americans.

**NCAPA strongly urges OMB to remove “Other” from the category “Native Hawaiian and Other Pacific Islander.”** NCAPA supports APIAHF’s recommendation, developed with the Native Hawaiian & Pacific Islander Alliance, to change this terminology. The term “Native Hawaiian and Other Pacific Islander” has fallen out of favor. Instead, major NHPI organizations and community leaders declared nearly a decade ago that the preferred term “Native Hawaiian and Pacific Islander” is “a cultural construct and reflects the preference of the NHPI community.” ([http://www.apiahf.org/sites/default/files/NHPI\\_Healthbrief0131\\_2008.pdf](http://www.apiahf.org/sites/default/files/NHPI_Healthbrief0131_2008.pdf))

**NCAPA supports the proposals to end the use of a “principal minority race” and the “All Other Races” category in the Standards.**

### **Classification of a Middle Eastern and North African group and distinct reporting category**

**NCAPA strongly urges OMB to establish a Middle Eastern and North African (MENA) group and distinct reporting category.** NCAPA supports the recommendations by the Arab American Institute, the National Network for Arab American Communities, and others in support of establishing this new classification and reporting category. Americans with Middle Eastern and North African origin identify with many racial backgrounds, and an aggregate response category is the appropriate approach. Because of the diversity of those with MENA origin, the category should be collected as an ethnicity and should not be reported as a race. In order to provide the most comprehensive data possible, the MENA region should have the most comprehensive geographic definition, to include populations with origins in member nations of the League of Arab States as well as Turkey, Iran, Israel, and pan-national ethnic communities from this region.

Our basis for this recommendation echoes the reasons for our recommendations regarding more disaggregated data for AA & NHPI populations—improving the data collected and reported so that government departments and agencies, as well as community-based organizations, can better identify needs and concerns and more adequately direct services and resources.

### **Use of separate questions versus a combined question to measure race and ethnicity and question phrasing**

**NCAPA supports whichever format will provide the highest rates of AANHPI participation and self-identification.** The detailed reporting for AANHPIs that was achieved previously must be maintained or improved. NCAPA also supports AAJC’s recommendation that for either format (separate versus combined), there should be:

- A maximum number of checkboxes included, with at least the same number used as during the 2010 Census;
- A maximum number of examples, with at least the same number used as during the 2010 Census; and <sup>SEP</sup>
- NHPI response options should be clearly identified separate from Asian American response options.

### **General Principles for the Review of the Racial and Ethnic Data Categories**

NCAPA supports most of these general principles, and in particular that “respect for individual dignity should guide the processes and methods for collecting data on race and ethnicity [and that] respondent self-identification should be facilitated to the greatest extent possible.”

**NCAPA supports SEARAC’s recommendation** that the fifth principle be changed as follows:

“Foremost consideration should be given to data disaggregation by race and ethnicity that are useful for statistical analysis, program administration and assessment, and enforcement of existing laws and judicial decisions, bearing in mind that the standards are not intended to be used to establish eligibility for participation in any Federal program.”

Placing the “foremost consideration” on “data aggregations by race and ethnicity” may lead to federal departments and agencies misinterpreting the Standards, which are intended to provide a minimum set of racial and ethnic categories and not a maximum. Furthermore, as explained in these comments, foremost consideration should be given to disaggregated data, which is necessary to illuminate the priorities, needs, and concerns of AANHPIs.

### **Concerns Regarding OMB’s Review Process**

NCAPA echoes the concerns by many organizations that OMB is considering a truncated timeline that may not allow for meaningful engagement by stakeholders such as advocacy organizations, Congress, and the public at large. We strongly urge OMB to ensure that the all public comments and feedback for this current Federal Register notice are incorporated before issuing the second Federal Register notice. Furthermore, adequate time—far more than 30 days—must be given for the comment period in response to the second notice.

### **Conclusion**

NCAPA agrees that “The application of these principles to guide the review and possible revision of the standard ultimately should result in consistent, publicly accepted data on race and ethnicity that will meet the needs of the government and the public while recognizing the diversity of the population and respecting the individual’s dignity.” We appreciate the opportunity to submit these comments, which we believe further these principles, ensure that no American is invisible to his or her government, and will greatly improve the lives of Asian Americans, Native Hawaiians, and Pacific Islanders.

If you have any questions, please feel free to contact me at [chris@ncapaonline.org](mailto:chris@ncapaonline.org), 202-706-6766.

Sincerely,



Christopher Kang  
National Director