



October 31, 2016

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Office of Management and Budget
1800 G Street, 9th Floor
Washington, DC 20503

RE: Standards for Maintaining, Collection, and
Presenting Federal Data on Race and Ethnicity

Dear Colleagues,

Thank you for the opportunity to submit comments on the Office of Management and Budget (OMB)'s review of the standards for Maintaining, Collection and Presenting Federal data on Race and Ethnicity. This continued improvement of data collection by federal agencies is a critical issue for Asian American, Native Hawaiian and Pacific Islander populations – a very racially and ethnically diverse population, and highly underserved in many parts of the country due to inadequate data collection and reporting.

The National Coalition for Asian Pacific American Community Development (National CAPACD) is a coalition of more than 100 community-based organizations spanning 19 states, Washington DC and the Pacific Islands that seeks to improve the quality of life for low-income Asian Americans, Native Hawaiians and Pacific Islanders (AANHPI). Collectively, the coalition improves the lives of low income AANHPIs by providing voice, tools, and shared knowledge to drive change. The coalition focuses on promoting economic vitality, civic and political participation, and racial equity through a broad range of strategies, from policy advocacy to asset building and housing counseling programs.

The AANHPI community is the fastest growing racial group in the country, growing over four times as rapidly as the total U.S. population. Between 2000 and 2010, the poverty population growth rate increased 46% from 1.16 million to 1.73 million. Over the same period, Native Hawaiian and Pacific Islander poverty population increased by 77%. With AANHPI populations experiencing this alarming increase in poverty rates – it will be critical to capture a more accurate picture of the race and ethnicities of those most in need in order to adequately develop and inform public policy.

We strongly urge OMB to establish more comprehensive and detailed data collection and reporting categories. Encouraging agencies to collect further data where needed may not be sufficient to ensure adequate representation of these communities. More specific directives and strategies such as oversampling methodologies should be used in areas where sample sizes may be too small for analysis, but there is significant concentration of a race or ethnicity. In states such as California or Hawaii, aggregate data on AANHPIs is not helpful in designing culturally and linguistically



competent programs and services, or for determining need. Research methodologies must incorporate strategies to oversample specific ethnicities within the AANHPI category, so that data can be disaggregated and reported out. The current standards do not adequately represent the diversity of Asian Americans and Pacific Islanders, and should be further expanded through check boxes rather than writing in categories to the greatest extent possible. An individual is much more likely to respond to a survey if there is the ability to choose an identity that is accurate. We strongly support ability of individual to self-identify; however, we recommend that an expanded list of options be provided under the Asian and Pacific Islander categories. The list of sub- groups used for the American Community Survey (ACS) is much stronger– models like this should be implemented by other federal agencies as well.

The inadequacy of current standards can be clearly shown in the case of Home Mortgage Disclosure Act (HMDA) data collection. The HMDA race and ethnicity data as reported to date has been extremely ineffective in capturing the varied experiences of AANHPI borrowers. While the aggregated data has generally shown that Asian borrowers have similar experiences to non-Hispanic white borrowers, it has masked the reality of lending disparities and discrimination practices experienced within Asian subpopulations. One concrete example of this is that of the South Asian community of Queens – where more than 50% of defaults were among South Asians in many neighborhoods. This was not realized until our member organization, Chhaya CDC, manually disaggregated HMDA data based on surnames to assess needs and was able to prioritize building out a foreclosure prevention program – helping to stabilizing entire neighborhoods in the borough of Queens, NY.

With more than 50% of AANHPIs living in the top ten Metropolitan Statistical Area (MSA)'s, oversampling for these communities should be considered as a recommended approach. For example, because of the relative size of the AANHPI population, most national housing-related surveys do not have sample sizes large enough to yield statistically significant analysis when the AAPI data is disaggregated by ethnicity, income, or geography. The American Housing Survey (AHS), the most comprehensive regular survey of the housing conditions in the US, had a national sample in 2013 of approximately 60,000 occupied households, including a little less than 3,000 AAPI households. At a national level, this sample size of roughly 3,000 AANHPI households is more than adequate to have a picture of housing characteristics for AANHPIs as an aggregate, national group. However, outside of the largest AANHPI demographic groups (e.g., persons of Chinese national origin) or the metropolitan areas that have the largest populations of AANHPIs (e.g., the New York City MSA), most smaller sub-sets of the data do not have sufficient sample size to draw statistically significant conclusions, especially when cross-tabulated with income data. National CAPACD has recommended to HUD that a more effective approach for the AHS would be to survey more heavily from specific census tracts with high populations of poor and low-income AANHPIs and from specific neighborhoods that have higher populations of under-represented AAPI ethnicities (i.e., higher populations of South Asians, South East Asians, Native Hawaiians, and Pacific Islanders).



Without disaggregated data on Asian Americans, Native Hawaiians and Pacific Islanders – documenting issues such as systemic housing discrimination is simply not possible. New York City’s Department of Planning publishes its “Newest New Yorker” reports which proves to be invaluable to the City’s planning and investments. We would strongly encourage OMB to look at innovations on the local and regional level that are being implemented across the country to address the need for more accurate demographic data.

We appreciate these first steps that OMB has taken to address this critical issue to better adapt to the changing population of the US and look forward to continuing in this process to improve data collation on race and ethnicity.

Sincerely,

A handwritten signature in black ink, appearing to read "Seema Agnani", written in a cursive style.

Seema Agnani
Director of Policy