



October 31, 2016

Katherine K. Wallman
Chief Statistician
The Office of Management and Budget
1800 G St., 9th Floor
Washington, DC 20503

RE: Docket ID OMB-2016-0002-0001

Dear Ms. Wallman:

The Southeast Asia Resource Action Center (SEARAC) would like to submit a public comment addressing one of the areas identified for focused review by the Interagency Working Group for Research on Race and Ethnicity: the description of the intended use of minimum reporting categories. Founded in 1979, SEARAC is a national organization that advances the interests of Cambodian, Laotian, and Vietnamese Americans by empowering communities through advocacy, leadership development, and capacity building to create a socially just and equitable society. We represent the largest community of refugees ever to be resettled in America.

On behalf of our communities, we would like to make the following recommendations.

Recommendations:

- A new description of the intended use of minimum reporting categories should read: “Federal agencies *should* collect and present additional detailed racial and ethnic categories for statistical, administrative, and/or compliance purposes. The final ethnic and racial categories defined by OMB should be interpreted as a **bare-minimum requirement**, and **not a maximum** that agencies should strive for.”
- One of the general principles that should govern any proposed revisions to the standards should include: “Foremost consideration should be given to ***data disaggregation*** by race and ethnicity that is 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.”
- Do not issue the 2nd federal register notice until the Census Bureau has released the full results of the 2015 National Content Test.

- Have a 90 or 120-day comment period for the 2nd federal register notice.
- Aim to issue the 3rd (and presumably final) federal register notice by fall 2017 to inform the submission of final 2020 Census questions to Congress by April 1, 2018.

The collection of more detailed racial and ethnic data (i.e., further data disaggregation) is especially critical for the Asian American, Native Hawaiian, and Pacific Islander (AANHPI) communities. In fact, data disaggregation is the foremost civil rights issue for the AANHPI community in the United States. AANHPI communities demand to be fully seen and recognized, not rendered invisible through the use of broad racial categories.

Lack of disaggregated data has allowed chronic systemic challenges to grow without any federal acknowledgement, support, or resources. For example, in 2012, of all Asian adults over the age of 25, 14% did not complete a high school diploma, about the same as the national average. By contrast, around 1 in 3 Southeast Asian Americans over 25 has less than a high school diploma (35% of Cambodians, 33% of Hmong, 31% of Laotian, and 29% of Vietnamese Americans).¹

When federal data only reflects averages for all Asian Americans or all Pacific Islanders/Native Hawaiians, these stark disparities are obscured. When our needs are invisible, true equity is impossible. The new description of the intended use of minimum reporting categories should read: “Federal agencies *should* collect and present additional detailed racial and ethnic categories for statistical, administrative, and/or compliance purposes.”

Data that further disaggregates AANHPI categories will demonstrate disparities that may not be evident to policymakers without this data. This information is critical for informing federal policymakers when they create new federal policies, programs, and reports that impact the AANHPI community.

According to OMB’s own research, as noted in the federal register, some federal agencies do not collect additional racial and ethnic data even though they are encouraged to. This is devastating for the most vulnerable communities, which have the least data to protect them. Even the U.S. Department of Education’s K-12 data only disaggregates by the minimum “Asian” or “Pacific Islander” categories. But others, like the U.S. Department of Labor,² do report on additional racial and ethnic data, which has allowed us to see, for instance, that Vietnamese Americans have median weekly earnings at \$700, compared to Indian Americans at \$1,346. These two data points paint two very different pictures of the AAPI community, and only begin to hint at the wide disparities within our diverse communities. More consistent, detailed, and comparable data across all agencies will reveal similar patterns and provide policy makers with the tools they need to create targeted interventions that can help our most vulnerable families and students succeed.

¹ 2011-2013 American Community Survey 3-Year Estimates:

http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_3YR_S0201&prodType=table

² US Department of Labor, “The Economic Status of Asian American and Pacific Islanders,”

<https://www.dol.gov/sec/media/reports/AsianLaborForce/2016AsianLaborForce.pdf>

Finally, collecting data by race is part of the legacy of the civil rights movement that made it possible to protect all communities from discrimination. Eliminating the collection of data based on race would cripple and destroy our nation's very foundation of civil rights protection. We are fighting to protect and expand this legacy, not dismantle it. Unveiling disparities within our diverse communities will give us the tools we need to protect the civil rights promised to us under the law. We need critical information about patterns of inequity, poor health, educational opportunity, or unequal access across diverse AANHPI communities to equip us in the fight for equal opportunity and quality of life for all.

Like other civil rights laws over the last 50 years, we must not make data disaggregation a voluntary endeavor, relying on the good will of the current leadership of each institution. We need a durable solution to aid us in a long-term struggle to heal long-standing disparities.

Data has the power to reveal or to conceal the tremendous diversity within our communities. Collecting additional detailed racial and ethnic data is part of a historic movement forward for our communities' self-determination to analyze our own challenges and develop our own solutions. We are united, but we are not the same.

Sincerely,

Quyen Dinh
Executive Director
Southeast Asia Resource Action Center (SEARAC)