

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.
Micronesian 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