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August 9, 2024

Sent via email to: acso.pra@census.gov

Re: American Community Survey Timeline for Implementing Updated 2024 Race and Ethnicity Data Standards (FR Doc. 2024-15336)

To whom it may concern:

On behalf of the [Population Association of America \(PAA\)](#), the PAA Committee on Population Statistics (COPS), and [Association of Population Centers \(APC\)](#), we are pleased to respond to the July 24, 2024 *Federal Register* notice, requesting comments on a proposed timeline for adopting new race and ethnicity standards in the American Community Survey (ACS) as outlined by the U.S. Office of Management and Budget (OMB) in Statistical Policy Directive No.15 (SPD 15).

Together, PAA and APC jointly represent over 3,000 individual population scientists—including demographers, economists, sociologists, and epidemiologists—as well as approximately 40 federally funded interdisciplinary research centers. Population scientists study the individual, societal, and environmental implications of population change—and thus contribute key findings that help inform evidence-based policy making in the public and private sectors. Population research centers facilitate interdisciplinary research on a range of topics including mortality, morbidity, fertility, adolescent health, aging, population forecasting, immigration, labor and workforce policies, family dynamics, and human-environmental interactions. They also train emerging and early career scientists. Population scientists have expertise on the measurement of race and ethnicity and rely on ACS data extensively for their research and training activities. Therefore, our organizations have a vested interest in plans for implementing the updated 2024 race and ethnicity data standards in the ACS.

PAA and APC support the plan and the proposed timeline described by the Census Bureau in the *Federal Register* notice for adopting the new race and ethnicity standards in the ACS. Implementing the new standards in the ACS as quickly as possible is important, but it is essential to get the implementation correct and to involve stakeholders, data users, and the research community in ensuring that the rollout is done well. This process will take time. The proposed extra year in the timeline associated with adopting the new standards in the 2027 ACS to ensure that it is done well is a worthwhile compromise to achieve this goal.

The plan to develop crosswalks between the old and new race and ethnicity standards is crucial for their implementation by the Census Bureau. PAA and APC have a significant interest in the development and performance of crosswalks to

ensure comparability with earlier data products and in understanding how data products will change with the adoption of the new race and ethnicity statistical standards. Details about how the crosswalks will be developed and used are of considerable interest to the demographic research community that PAA and APC represent. Preliminary versions of these crosswalks should be developed so that experimental data products can be examined and evaluated before they are finalized for dissemination. We strongly encourage transparency and engagement with our members and other data users as the crosswalks and new tabulations are developed, tested, and implemented.

The crosswalks to be developed by the Census Bureau are forward oriented and backwards compatible, because they convert reports collected under the earlier standards to the new standards. For a variety of reasons, it will also be valuable to have backward oriented crosswalks, in addition to the planned forward oriented crosswalks. The ability to describe trends in population composition by race and ethnicity in both directions across the change in statistical standards is important to many data users, who will appreciate crosswalk capabilities that clearly document and justify the underlying assumptions.

An important concern to ACS data users is how data collected under the new standards will be tabulated. With the new tabulations, how will individuals who responding to two categories (e.g., Hispanic and Asian) be treated? Will such persons be treated as a combination of two separate groups or would data products provide the flexibility to treat them as a person of Hispanic ethnicity who identifies as Asian race? Some users might want to continue treating Hispanic as an ethnicity separate from race. We encourage the Census Bureau to develop guidance on preparing such tabulations, which would be an essential feature of backward oriented crosswalks. For instance, a crosswalk to provide backward compatibility will allow data users to estimate how people choosing the MENA response option (alone or in combination with other responses) would have responded in the past if it had been available.

In closing, PAA and APC appreciate the opportunity to respond to this *Federal Register* notice and thank the Census Bureau for their planned work to adopt the new race and ethnicity standards. We look forward to the Census Bureau working with our members and other data users as the crosswalks and new tabulations are developed, tested, and implemented.

Sincerely,



Dr. Jennifer Glass
2024 PAA President



Dr. Jennie Brand
2023-2024 APC President