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March 31, 2023

Interagency Technical Working Group on Race and Ethnicity Standards
1650 17th St., NW
Washington, DC 20500

Sent via email to: Statistical_Directives@omb.eop.gov

Re: Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards

Dear Members of the Interagency Technical Working Group on Race and Ethnicity Standards,

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 notice in the 27 January 2023 *Federal Register* requesting comments on initial proposals for updating the Office of Management and Budget (OMB) statistical standards on race and ethnicity. These new standards would replace the current standards, in effect since 1997, that are described in the Statistical Policy Directive No. 15L Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15).

Together, PAA and APC jointly represent about 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 rely on federal statistical data to conduct their research and research training. Therefore, our organizations have a vested interest in any changes made to SPD No. 15.

PAA and APC have followed closely the extensive research conducted by the Census Bureau and other federal agencies that have led to this initial proposal, especially the work on the 2010 Census Alternative Questionnaire Experiment (AQE) and the 2015 National Content Test (NCT). Given the existing evolved plans for updating the race and ethnicity statistical standards that were developed in advance of the 2020 Decennial Census, as well as the growing diversity of the U.S. population by race, ethnicity, and national origin since 1997, these initial

proposals from the Interagency Technical Working Group on Race and Ethnicity Standards are timely. In particular, moving forward with the initial proposals for updating OMB's race and ethnicity statistical standards will support early preparations for the 2030 Decennial Census, updates to the American Community Survey, and revisions to other federal surveys and administrative data collection efforts.

PAA and APC strongly support the efforts of OMB, the Census Bureau, and other federal agencies participating in the Interagency Technical Working Group on Race and Ethnicity Standards to address the important issues related to the changing race and ethnic composition of the U.S. and the evolution of individuals' endorsement of the groups to which they belong. The updates being considered by the Working Group are important for maintaining the quality and detail of data available about the U.S. population for purposes of policymaking, policy evaluation, enforcement of federal laws, social and behavioral research, and public knowledge.

Below we address several key areas for which the Interagency Technical Working Group is soliciting feedback through the *Federal Register* notice.

Collecting Race and Ethnicity Information Using One Combined Question

PAA and APC support the use of one combined question to collect information on race and ethnicity. We have expressed support of this change on several occasions in the past. The main reason for this support is that the wording and format of the separate race and ethnicity questions that are currently in use do not align with how many residents of our nation self-identify, which results in inaccurate or incomplete data.

An important practical question associated with adopting the single combined question is the extent to which respondents endorse two or more response categories (noting that multiple subcategories can also be chosen). Respondents should be encouraged to endorse as many response categories as needed to represent their identity accurately, but the option of choosing a single response category should also be clear. Although the growth of the multiracial population in the U.S. has been rapid,¹ its growth should be independent of the approach used to collect information on race and ethnicity.

We understand, and are sympathetic to, the concerns raised by advocates of retaining the current two-question format because of the information it provides on race subgroups among the Hispanic population. However, the single question approach could replicate the information provided on race subgroups among Hispanics through the appropriate choice of multiple race response options. At the same time, the single question approach avoids the problem for many Hispanic or Latino respondents of feeling compelled to skip the race question or choose the "Some Other Race" response option (which together represented more than two in five responses among Hispanic or Latino individuals in the 2020 Census).

¹ Jones, Nicholas, Rachel Marks, Roberto Ramirez, Merarys Ríos-Vargas. 2021. 2020 Census Illuminates Racial and Ethnic Composition of the Country. U.S. Census Bureau. Available at <https://www.census.gov/library/stories/2021/08/improved-race-ethnicity-measures-reveal-united-states-population-much-more-multiracial.html>.

Adding “Middle Eastern or North African” (MENA) as a New Minimum Category

PAA and APC continue to support the addition of the “Middle Eastern or North African” (MENA) response option as a new minimum category. This change provides the opportunity to track outcomes for this important population subgroup that was previously incorporated within the “White” reporting category. Because MENA is currently covered by the “White” reporting category, concerns about comparability of reports over time are modest. In particular, the White and MENA categories can be combined in the future to provide comparability with data collected under the current standards.

Placement of the White versus MENA responses in questionnaire instruments may have an effect when this new category is adopted. In particular, based on previous reporting experience, individuals may be conditioned to report as White and may not see the MENA response option if it appears at the bottom of the list of response options.

Collecting Detailed Race and Ethnicity Data

The detailed race and ethnic categories largely represent ancestry, based on country of origin. The usefulness of these different country-based ancestral groups for policy and research purposes is not clear. As interest in genealogy continues to increase and is supported by availability of new measures of genetic ancestry, through firms such as AncestryDNA, reporting detail may change over time across the U.S. population and at the individual level. The detailed response category examples omit those based on broader regional identity, such as Scandinavian, European, Central America, or South Asian—largely offering just country of origin as the basic unit of identity. At the same time, the response categories tend to de-emphasize transnational groups, and no subnational groups with distinct identities are provided as examples. The implications of these choices should be considered carefully before the new standards are finalized. The option to collect a single open-ended question covering self-identified ancestry, nationality, ethnicity, or tribal affiliation should be investigated. These efforts should be informed by a clear rationale and purpose for collecting detailed race and ethnicity data.

Lastly, the guidelines and recommendations about when to collect data using the minimum categories versus the detailed categories warrants careful consideration. Given the ancestral nature of detailed categories, reporting of multiple subcategories will likely grow over time, due to intermarriage and declines in the immigrant population, and the detailed subcategories may hence become less useful over time. Consideration should be given to alternative approaches to conceptualizing and collecting the necessary detail associated with race and ethnicity beyond the minimum categories to make these relevant and usable.

Terminology

PAA and APC support the initial proposals for terminology to be used in the updated race and ethnicity statistical standards.

Implementation Guidance

We address a number of challenges for data collection, processing, analysis, and reporting that we anticipate will arise with the updated statistical standards for race and ethnicity. PAA and APC have particular concerns about the development and performance of crosswalks to ensure comparability with earlier data products and about how data products will change with the adoption of the new race and ethnicity statistical standards. We strongly encourage transparency and engagement with our members and other data users as the crosswalks and new tabulations are developed, tested, and implemented.

A leading concern is the alignment of data across the old and new statistical standards. The *Federal Register* notice mentions the provision of a crosswalk for this purpose. However, data users have specific concerns about assumptions that will underlie the crosswalk and the comparability of data across the old and new statistical standards. Both forward and backward crosswalks are needed to ensure this comparability. For example, a crosswalk to provide backward comparability will need to determine how many people in the past would have chosen the MENA response option (alone or in combination with other responses) if it had been available. At the same time, forward comparability is also needed in a separate crosswalk. For the MENA example, such a crosswalk will be helped by most MENA respondents having chosen the White category under the current standards. The ability to describe trends in population composition by race and ethnicity 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.

Data users have many specific concerns about tabulations of data collected under the new standards. Would tables continue to include reporting of race “alone” with categories that sum to total population, as well as tables reporting race “alone or in combination” that sum to total tallies (but not to total population)? How would “alone” and “alone or in combination” tabulations based on a single question compare with those based on separate questions? With separate questions, a person responding as Hispanic or Latino for ethnicity and Asian for race would count toward the Hispanic total and the “Asian alone” total. With the combined question, would such a person 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. Will the new standards offer guidance on preparing such tabulations?

The Census Bureau is currently required by Congress to collect and report data for the "Some Other Race" category. How will this requirement be implemented under the proposed standards? For example, would the Census Bureau continue to include "Some Other Race" in American Community Survey (ACS) tabulations, but provide estimates of population by "Modified" race, where persons of "Some Other Race" are distributed to specified race categories? For bridging, would there be separate crosswalk files for data with and without the "Some Other Race" category?

Data users are interested to learn how the revised standards will be incorporated into ACS data products. A specific concern is the transition of the ACS’s 5-year period estimates to the

new race and ethnicity standards. Would five years of data collection need to occur before the 5-year estimates are reported, or will the crosswalk allow the 5-year estimates to be prepared sooner? If the crosswalk approach is chosen, the stakes for its accuracy and comparability will be higher still. Users of ACS microdata will be interested in the availability of a crosswalk for these data.

The large number of detailed race and ethnicity categories is a concern. The rationale for collecting detailed categories of race and ethnicity is of course to use them for reporting purposes. However, the use of these detailed race and ethnicity categories, especially for small area estimates, will face challenges with small cell sizes, appropriate aggregation, and imposition of disclosure avoidance processes that may impair the utility of the data and reduce the benefits of using the detailed response categories. This issue deserves very careful consideration.

The 1997 change to the race and ethnicity standards took considerable time to be fully adopted, especially among state and local governments. Delays in adoption will have a negative effect on population estimates and projections because of their dependence on vital statistics birth and death rates from states. Choices that states make about the timing for adoption of the new standards will, thus, be consequential. PAA and APC encourage the rapid and broad implementation of the new race and ethnicity reporting standards.

Data on race and ethnicity collected under the new standards will be affected by non-response patterns, proxy responses, editing, and imputation of missing information. How these issues are addressed will significantly affect the quality, timing, and detail for data on race and ethnicity available to all users. PAA and APC encourage Federal agencies to be transparent and seek user input on procedures used to produce data and tabulations on race and ethnicity.

Finally, as data collection increasingly shifts to the web, and smartphones in particular, the distinction between reporting minimum categories and detailed categories may change. This change may be driven by the challenge of placing the full combined question with minimum and detailed categories on a smartphone screen. A two-part question may work best under these circumstances, in which respondents first report their minimum category or categories and then report their detailed categories. A sequential reporting scheme may have effects on reporting patterns and should be investigated before it is adopted.

In closing, PAA and APC thank the Interagency Technical Working Group on Race and Ethnicity Standards for their work to address the important issue of measuring of race and ethnicity in the U.S. and for the opportunity to provide comments on their initial proposal. Appropriate measurement of race and ethnicity in the US is important for many reasons—including advancing our understanding of equity in health and well-being, the effects of government programs, patterns of population growth and change, and many other topics of vital interest to policymakers, researchers, and the public. We support the initial proposals provided by the Technical Working Group and look forward to providing additional input as these new standards are refined and plans for implementation are developed.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'L Berkman', with a long horizontal stroke extending to the right.

Dr. Lisa Berkman
2023 PAA President

A handwritten signature in black ink, appearing to read 'J Brand', with a large, stylized 'J' and a long horizontal stroke.

Dr. Jennie Brand
2023-2024 APC President

A handwritten signature in black ink, appearing to read 'N Sastry', with a large, stylized 'N' and a long horizontal stroke.

Dr. Narayan Sastry
Chair, PAA Committee on Population Statistics