

Population Association of America Association of Population Centers

Office of Government and Public Affairs

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October 27, 2016

Katherine K. Wallman
Chief Statistician
Office of Management and Budget
1800 G St. 9th Floor
Washington, DC 20503
Sent via email: Race-ethnicity@omb.eop.gov

RE: Standards for Maintaining, Collecting, and Presenting Federal
Data on Race and Ethnicity, Federal Register Vol. 81, No.
190/Friday, September 30, 2016: 67398-673401

Dear Ms. Wallman,

On behalf of the Population Association of America's (PAA)
Committee on Population Statistics (COPS) and Association of
Population Centers (APC), we are pleased to respond to the notice
in the September 30, 2016 Federal Register requesting comments
regarding the Standards for Maintaining, Collecting, and Presenting
Federal Data on Race and Ethnicity.

PAA and APC believe that the standards for the collection and
presentation of data by race and ethnicity are part of how we define
ourselves as a nation in the decennial census and the American
Community Survey (ACS), and are instrumental in ensuring that
high-quality data are collected and disseminated for research and
evaluation purposes.

The PAA and APC applaud the efforts of the Office of
Management and Budget (OMB) to provide respondents with a
greater opportunity to report their detailed race and ethnicity. The
PAA and APC believe that the Census Bureau should continue to
test more inclusive options, and provide the detail that is essential
for the conduct of policy research, program planning and
implementation, and the social science research that undergirds our
understanding of differences and similarities by race, ethnicity and
origin.

Nowhere are the difficulties encountered with collecting data on
race and ethnicity more apparent than in the decennial census and
ACS. For decades, data users have been provided with numbers for

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detailed Asian and Hispanic subgroups from the decennial census short form, but no detail on subgroups that may be included under white and black race categories. Around census time, local census partners have often been in a difficult position to explain why someone who is Chinese gets to list themselves in detailed fashion, while those who are Jamaican or Irish do not. This has become an especially important issue starting in 2010, with the decoupling of the long form from the decennial census. Some groups (e.g. Black West Indians) feel overlooked because of their seeming inability to report their detailed race/ethnicity within the existing race/Hispanic categories. The spirit of inclusiveness that is actively promoted by the Census Bureau around the decennial census could be compromised in some communities because of this issue.

After reviewing the results of the 2010 Alternate Questionnaire Experiment (AQE), the PAA and APC believe that the one-question option likely holds the most promise regarding the collection of more detailed information on racial/ethnic origins. Increased reporting detail and lower item non-response are among the results that provide at least tentative support for the single question approach. Moreover, the results of cognitive testing and focus group research have shown that the one-question approach is perceived as more equitable. Still, given the importance of race/ethnicity as part of the decennial census, the PAA and APC fully support OMB's efforts to acquire more definitive evidence regarding the viability of the measurement alternatives, in the form of continued testing.

The PAA and APC acknowledge that including write-in options under the existing five categories may be insufficient for the purposes of providing more sub-group data, since respondents from the Middle East or North Africa may not associate themselves with any of these existing categories. Therefore, the PAA and APC believe that there is a real need for a separate Middle Eastern or North African (MENA) category. At the same time, we encourage OMB and the Census Bureau to continue soliciting input regarding the inclusion of separate MENA category in the 2020 Census from the population subgroups most affected by the inclusion of this category.

In its efforts to be more inclusive, the PAA and APC applaud the Census Bureau's efforts to gather data on the efficacy of the terms "race," "ethnicity" and "origins." However, this needs to be done, not only as it relates to instructional materials, but potentially as part of the actual question wording. In the context of the Bureau's efforts to be more comprehensive, it should consider the possibility that the extensive use of the word "origins" in instructional materials may portend its usefulness in the actual question wording.

The use of different modes for data collection holds much promise for eliciting high levels of response while containing costs. As the Census Bureau is well aware from previous experience, even seemingly small changes in question wording or in the

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logistics of data collection can have important impacts on how individuals respond. In the area of race and ethnic data collection, this is especially true, as evidenced by the big impact of a seemingly small change in the examples provided as part of the write-in portion of the Hispanic question in 2000. Therefore, the PAA and APC would like to underscore the importance of continuing to evaluate test results for race and ethnicity by mode of data collection. This testing should inform a better understanding of possible differences between Internet-based self-response (with prompting for subgroups), versus response via other methods of collection, especially those involving paper questionnaires.

As alternative standards are considered, OMB should be mindful of the challenges users will face in transitioning to new categories. As with the last major revision, there will be demand for "bridged" race data, and users will look for guidance in estimating trends in the new categories. Revised race and ethnic categories also will be a first for the ACS, which would require a five-year transition before reporting new categories for small areas. Moreover, once new categories are established, users will be interested in their use in the Census Bureau's population estimates. Currently, these estimates reflect "modified" race, with "other" distributed to specified categories. These population estimates are inconsistent with more widely used census and ACS data, so users might see added benefit in the combined question if it reduces the "Some other race" population to the point where race estimates are no longer "modified."

Finally, the PAA and APC encourage the OMB to continue the practice of establishing minimum reporting categories, especially given the burden any change places on those engaged in reporting data on race and ethnicity for compliance purposes. At the same time, however, the OMB should continue to encourage data users to present and make use of the more detailed race and ethnicity categories. The PAA and APC believe that this would go a long way in establishing better statistical information on the nation's increased level of race and ethnic heterogeneity.

Thank you for the opportunity to provide comments on this very important issue.

Sincerely,

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