

# Population Association of America Association of Population Centers

## Office of Government and Public Affairs

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April 30, 2017

Dr. Jennifer Park

Office of Management and Budget  
9th Floor, 1800 G St. NW., Washington, DC 20503

Re: Comment to the Federal Interagency Working Group for Research on Race and Ethnicity for revisions to OMB's Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity

Dear Dr. Park,

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 March 1, 2017 *Federal Register* requesting comments on potential revisions of the OMB's standards on race and ethnicity that would replace the current standard in effect since 1997.

PAA and APC are impressed with the extensive research that the Census Bureau and other federal agencies have conducted to inform the discussions of potential revisions in the federal standard. Given the increased diversity of the US population by race, ethnicity and national origin since 1997, this review is well-timed. Furthermore, the proposed changes for how data on race/ethnicity would be collected in the 2020 Census would improve the quality and the detail of the data available about the US population for policy makers, enforcement of federal laws, researchers, and the public at large.

Below we address the four areas for which OMB solicits feedback and which were identified in the Federal Register notice in greater detail.

*(1) The use of separate questions versus a combined question to measure race and ethnicity and question phrasing*

The results from the 2010 Alternative Questionnaire Experiment (AQE) and 2015 National Content Test (NCT) both support the adoption of a combined question on race and ethnicity. In addition, the use of checkboxes for each of the racial/ethnic groups allows individuals to identify not only their race/ethnicity but also national



origin. The results, detailed in the 2015 NCT report, show that the combined question with the detailed checkboxes design elicits higher quality data on race and ethnicity, results that are consistent with those from the 2010 AQE. More specifically, there were no changes in the distribution of major race/ethnic groups with the combined versus separate questions; decreases in the reporting of some other race; lower item nonresponse; and same or higher level of detailed reporting. Examples of detailed national origin groups should also improve reporting among the foreign-born who often are not familiar with the American racial hierarchy or the questions on race/ethnicity.

**Recommendation:** PAA and APC recommends the adoption of the combined question format for soliciting information on race/ethnicity in the 2020 Census and in the revised federal standard.

At the same time, PAA and APC recognize the difficulties that this change would impose on other federal agencies and data collection efforts. Therefore, it would be highly desirable to provide a reasonable time period for implementing such a change. It would also be important for the Census Bureau to undertake research to examine how these changes will affect analyses of population trends by race/ethnicity and make data available to allow the research community to assist the Bureau in these efforts.

*(2) The classification of a Middle Eastern and North African group and distinct reporting category*

The addition of a category for Middle Eastern and North African (MENA) origin group has been under consideration for some time. In the 2015 NCT, the addition of this category was tested to determine whether individuals who originated in the countries included in the MENA category would identify as MENA. The findings indicated that individuals with MENA nationalities and ethnicities identified as MENA when the category was available, but otherwise largely identified as white when the category was not available. The addition of a MENA category would be the second major change (the other being moving from a separate to a combined question on race/ethnicity) in the national standard on race/ethnicity.

**Recommendation:** PAA and APC recommends that the Census Bureau and the Interagency Working Group (IWG) continue to solicit feedback from the MENA community concerning the addition of this new category and to assess to what extent this category is interpreted as reflecting religious affiliation. In addition, we recommend that OMB continue discussions with the IWG on the implications of adding this new category for other federal data collection efforts.

*(3) The description of the intended use of minimum reporting categories*

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The interpretation of the federal standard on race/ethnicity should not be interpreted as the “maximum” rather than as its intended meaning as the “minimum” standard.

**Recommendation:** PAA and APC recommends that OMB provides detailed guidance to federal agencies, policy makers, researchers, and the public at large about the intended meaning of the federal standard as the minimum rather than a maximum standard. In addition, we recommend that OMB provides guidance for federal agencies how the data would be tabulated and made publicly available based on the new more detailed information that the proposed new questions in the 2020 Census would provide about the racial and ethnic origins of the US population.

*(4) The salience of terminology used for race and ethnicity classifications and other language in the standard.*

The results from the 2015 NCT suggests that the combined question with detailed check boxes will improve the reporting of race/ethnicity and provide additional detail on the heterogeneity of the US population. For example, the findings show that this format elicits higher quality data on Asian Americans and Hispanics and provides an opportunity for white and black Americans for the first time to identify their national and ethnic origins, an opportunity that Asian Americans and Hispanics have had in the past. The slight wording changes that encourage multiple race reporting also are positive given the increase in the US multiracial population in recent decades.

**Recommendation:** PAA and APC support the inclusion of detailed check boxes for all racial/ethnic groups in the 2020 Census and the proposed wording changes.

In closing, PAA and APC recognize that soliciting information on individuals’ racial and ethnic identities is complex and that these identities can change over time and be influenced by questionnaire design and the context in which this information is solicited. How these questions are asked in the US Census of Population has changed over the decades and these changes have been shaped by the changing composition of the US population. The proposed changes for the 2020 Census and in the federal standard are consistent with this long tradition.

Sincerely,

Dr. Amy Tsui  
President  
Population Association of America

Dr. Steve Ruggles  
President  
Association of Population Centers