January 22, 2018

Ms. Neomi Rao
Administrator
Office of Management and Budget
Office of Information and Regulatory Affairs
Washington, DC 20500

On behalf of the over 3,000 scientists who are members of the Population Association of America (PAA) (www.populationassociation.org) and the over 40 federally supported population research centers at U.S. based research institutions comprising the Association of Population Centers (APC), we are writing to express our concerns regarding inaction on revisions to the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.

Population scientists include demographers, economists, and sociologists who conduct research on population trends and the individual, societal, and environmental implications of population change. They rely on the accurate and timely data from the federal statistical agencies to produce research findings and conduct research training activities. The racial and ethnic composition of the U.S. population is a fundamental statistical measure that must be collected responsibly and consistently to inform population research and research outcomes. Hence, last April, PAA and APC responded to a request from the Office of Management and Budget (OMB) for public comments regarding potential revisions of the federal government’s race and ethnic standards, which have been in effect since 1997. In public comments PAA and APC urged OMB to:

1) adopt a combined question format for soliciting information on race/ethnicity in the 2020 Census and in the revised federal standard;

2) solicit feedback from the Middle Eastern and North African (MENA) community concerning the addition of this new category;

3) provide detailed guidance to federal agencies, policy makers, researchers, and the public at large about the intended meaning of the federal standard as a minimum rather than a maximum standard and to clarify how data would be tabulated and disseminated; and,

4) support the inclusion of detailed check boxes for all race and ethnic groups in the 2020 Census and the proposed multiple race reporting changes.
As you know, last fall, an interagency technical working group completed years of deliberations and submitted to OMB a report detailing options for revising the current race and ethnic standards. The public was informed that a decision would be issued in December 2017. The deadline, while not legally binding, was identified largely to give the Census Bureau sufficient time to craft revised Census 2020 questions and submit those questions to Congress, as required statutorily, by April 1, 2018. Without action on the standards, years of intensive research and evaluation, which includes the work of the federal interagency group and information gathered during the 2015 National Content Test, will have been squandered.

We urge the Administration to act on the technical working group’s recommendations and to consider the consequences of inaction at this critical juncture when the U.S. population is undergoing tremendous demographic changes. Our organizations are eager to work with the Administration to communicate the outcome of your decision and work with the federal government to help implement any revisions to the race and ethnic standards.

Thank you for considering our views regarding this important matter.

Sincerely,

Wendy Manning, Ph.D., President
Population Association of America

Steve Ruggles, Ph.D., President
Association of Population Centers

cc: Nancy Potok, Chief Statistician of the United States