FEDERAL INTERAGENCY TECHNICAL WORKING GROUP ON
RACE AND ETHNICITY STANDARDS

Annex 4. Communications and Outreach Team Final Report

Contents

1. Executive Summary

The Federal Interagency Technical Working Group on Race and Ethnicity Standards' (Working Group) Communications and Outreach Team conducted a comprehensive review of all public comments received in response to the U.S. Office of Management and Budget's (OMB) January 2023 Federal Register Notice (FRN)[1] and during town halls, public listening sessions, and a tribal consultation. The Working Group acknowledges the thoughtful public response to these proposals and thanks those who took the time to provide written or verbal comments. Comments were provided by individuals, researchers, state and local governments (i.e., cities, towns, school districts, etc.), Tribal Nations, and non-profit organizations.

At the end of the public comment period, 20,255 written comments had been submitted in response to the FRN. Many comments were unique and written by individuals or organizations, while others were submitted by individuals as part of large write-in campaigns led by organizations. Most comments that were received supported the initial proposals by the Working Group and provided research and personal insight into how any revisions to Statistical Policy Directive No. 15 (SPD 15) will impact the data on race and ethnicity.

The majority of feedback on the topic of a **combined race and ethnicity question** supported using a combined question to more accurately collect data on the Hispanic or Latino population who have difficulty responding to the current two question format. There were also many comments suggesting the need to emphasize the ability for respondents to select multiple responses in a combined question to ensure the accurate collection of data for the Multiracial and Multiethnic Hispanic or Latino population. However, some feedback raised concerns that this would lead to the loss of race data for some respondents, particularly the Afro-Latino population.

Nearly all feedback on the addition of a **Middle Eastern or North African (MENA)** minimum response category was supportive of adding this as a new, minimum reporting category, and some offered feedback on which groups should be included in a MENA category or used as examples. There was a large write-in campaign supporting the addition of a disaggregated checkbox for the Armenian population within a new, minimum reporting category for the MENA population. There were very few comments that opposed the addition of a MENA category, but those that did opposed the collection of all race and ethnicity data.

A majority of comments on the topic of **disaggregated data** supported the collection of detailed race and ethnicity categories by default, citing the diverse experiences of members of each of the current minimum reporting categories. Many comments offered alternative suggestions to the Working Group's proposal and suggested that the revised SPD 15 allow flexibility in which detailed race and ethnicity categories be collected. However, some commenters expressed concerns about the implementation of collected detailed race and ethnicity categories by default, the burden it may place on their data collection systems, and concerns about data privacy and disclosure.

The public was also supportive of **removing outdated or offensive terminology** in the standards. There was also overall support for using the term "Multiracial" when describing those who identify with multiple races; however, many also stated that Multiracial and Multiethnic respondents should not all be aggregated into one category. Much of the feedback also stated it should be clear that respondents can "Mark all that apply."

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[1] U.S. Office of Management and Budget. (2023). Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards. *Federal Register, Vol. 88 (18)*. Retrieved from: https://www.federalregister.gov/documents/2023/01/27/2023-01635/initial-proposals-for-updating-ombs-race-and-ethnicity-statistical-standards.

Although minimal feedback on **implementation** was received, the feedback that was provided emphasized the need for bridging and to make documentation on coding publicly available. Concerns were also shared about allowing proxy or observational data collection for race and ethnicity.

Throughout the feedback period, feedback was provided on several **additional topics** such as the ordering of and the terminology used for the minimum reporting categories. There were also many comments encouraging the disaggregation of American descendants of slavery, though there was no consensus on which term should be used to describe this population. However, some organizations representing the Black or African American community urged caution in disaggregating this population, as it could lead to undercounts of the Black population.

2. Introduction

The Working Group used a variety of approaches to engage with the public with the goal of reaching a wide audience and providing several options for participating in the review process. These approaches included a 90-day Federal Register Notice (FRN), a series of virtual town hall meetings, biweekly listening sessions, and a tribal consultation. This report describes the feedback received from the public through these engagements.

3. FRN Methodology

The FRN published in January 2023 posed several questions about the initial proposals, implementation guidance, and additional topics and future research. [2]

Proposal 1. Collect race and ethnicity information using one combined question.
- Please provide links or references to relevant studies that examine or test any impacts of collecting race and ethnicity information using separate questions compared to a combined question.
- To what extent would a combined race and ethnicity question that allows for the selection of one or more categories impact people's ability to self-report all aspects of their identity?
- If a combined race and ethnicity question is implemented, what suggestions do you have for addressing challenges for data collection, processing, analysis, and reporting of data?
- What other challenges should we be aware of that respondents or agencies might face in converting their surveys and forms to a one question format from the current two-question format?

Proposal 2. Add ''Middle Eastern or North African'' (MENA) as a new minimum category.
- Given the particular context of answering questionnaires in the U.S. (e.g., decennial census, Federal surveys, public benefit forms), is the term ''Middle Eastern or North African (MENA)'' likely to continue to be understood and accepted by those in this community? Further, would the term be consistently understood and acceptable among those with different experiences, i.e.,

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[2] U.S. Office of Management and Budget, Executive Office of the President, Proposals From the Federal Interagency Working Group for Revision of the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, 82 FR 12242 (Mar. 1, 2017) www.federalregister.gov/ documents/ 2017/ 03/ 01/ 2017-03973/ proposals-from-the-federal-interagencyworking-group-for-revision-of-the-standards-for-maintaining.

those born in the U.S., those who immigrated but have lived for an extensive period of time in the U.S., and those who have more recently immigrated to the U.S.?
- Do these proposed nationality and ethnic group examples adequately represent the MENA category? If not, what characteristics or group examples would make the definition more representative?
- Would this proposed definition allow the generation of statistics necessary to track the experience and wellbeing of the MENA population?

Proposal 3: Require the collection of detailed race and ethnicity categories by default.
- Is the example design seen in [Figure 2](#) inclusive such that all individuals are represented?
- The example design seen in Figure 2 collects additional detail primarily by country of origin. What other potential types of detail would create useful data or help respondents to identify themselves?
- Some Federal information collections are able to use open-ended write-in fields to collect detailed racial and ethnic responses, while some collections must use a residual closed- ended category (e.g., ''Another Asian Group''). What are the impacts of using a closed-ended category without collecting further detail through open- ended written responses?
- What should agencies consider when weighing the benefits and burdens of collecting or providing more granular data than the minimum categories?
- Is it appropriate for agencies to collect detailed data even though those data may not be published or may require combining multiple years of data due to small sample sizes?
- What guidance should be included in SPD 15 or elsewhere to help agencies identify different collection and tabulation options for more disaggregated data than the minimum categories? Should the standards establish a preferred approach to collecting additional detail within the minimum categories, or encourage agencies to collect additional information while granting flexibility as to the kind of information and level of detail?
- Is the current ''default'' structure of the recommendation appropriate? Should SPD 15 pursue a more voluntary approach to the collection of disaggregated data, as opposed to having a default of collecting such data unless certain conditions are met?
- What techniques are recommended for collecting or providing detailed race and ethnicity data for categories with smaller population sizes within the U.S.?

Proposal 4: Update Terminology in SPD 15.
- What term (such as ''transnational'') should be used to describe people who identify with groups that cross national borders (e.g., ''Bantu,'' ''Hmong,'' or ''Roma'')?
- If a combined race and ethnicity question is implemented, what term should be used for respondents who select more than one category? For example, is the preferred term ''Multiracial,'' ''Multiethnic,'' or something else?
- Are these draft definitions: Comprehensive in coverage of all racial and ethnic identities within the U.S.? Using equivalent criteria? Reflective of meaningful distinctions? Easy to understand? Respectful of how people refer to themselves? Please suggest any alternative language that you feel would improve the definitions.
- As seen in Figure 2, based on the Working Group's initial proposal, the question stem asks ''What is your race or ethnicity?'' Do you prefer a different question stem such as: ''What is your race and/or ethnicity?'', ''What is your race/ethnicity?'', ''How do you identify?'', etc.? If so, please explain.

Proposal 5. Guidance is necessary to implement SPD 15 revisions on Federal information collections.

- For data providers who collect race and ethnicity data that is then sent to a Federal agency, are there additional guidance needs that have not been addressed in the initial proposals?
- With the proposals to use a combined race and ethnicity question and to add MENA as a minimum category, what specific bridging concerns do Federal data users have? Please submit any research on bridging techniques that may be helpful to the Working Group. Bridging refers to making data collected using one set of categories (e.g., two questions without MENA), consistent with data collected using a different set of categories (e.g., one question with MENA).
- What guidance on bridging should be provided for agencies to implement potential revisions to SPD 15?
- How should race and ethnicity be collected when some method other than respondent self-identification is necessary (e.g., by proxy or observation)?
- What guidance should be provided for the collection and reporting of race and ethnicity data in situations where self-identification is unavailable?

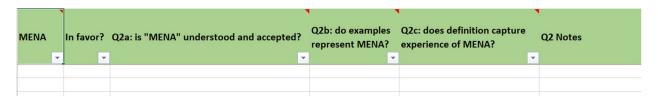**Comments On Any Additional Topics and Future Research.**

- SPD 15 does not dictate the order in which the minimum categories should be displayed on Federal information collections. Agencies generally order alphabetically or by population size; however, both approaches have received criticism. What order, alphabetical or by population size, do you prefer and why? Or what alternative approach would you recommend?
- The current minimum categories are termed: American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, White, do you have suggestions for different terms for any of these categories?
- How can Federal surveys or forms collect data related to descent from enslaved peoples originally from the African continent? For example, when collecting and coding responses, what term best describes this population group (e.g., is the preferred term ''American Descendants of Slavery,'' ''American Freedmen,'' or something else)? How should this group be defined? Should it be collected as a detailed group within the ''Black or African American'' minimum category, or through a separate question or other approach?
- The proposals in this FRN represent the Working Group's initial suggestions for revisions to SPD 15 to improve the accuracy and usefulness of Federal race and ethnicity data. The Working Group and OMB welcome comments and suggestions on any other ways that SPD 15 could be revised to produce more accurate and useful race and ethnicity data.

To assist the Working Group in developing comprehensive recommendations a review of the public comments was done by the Communications and Outreach Team. This team read, coded, and summarized all comments received in response to the FRN A spreadsheet was created with information about each public comment. Each row was an individual comment and contained the comment ID, the commenter's name (if given), link to the comment on the website, how many attachments the comment had, and the text of the comment. Coders could indicate whether the comment was part of a letter writing campaign (i.e., it took sections verbatim from other comments) or not. This allowed reviewers to see how many unique concerns were voiced, as well as the relative number of organizations/campaigns that advocated for certain perspectives. Coders could also mark what organization or agency the comment was from (if applicable).

To code the public comments, a column was created on the spreadsheet for each question asked on the FRN. The questions were placed in order and color coded by section. Figure 1 shows an example of how

the MENA related columns were organized. The column headings for the MENA questions were all color-coded green. The first column asked the coder whether the comment was related to MENA, the next was whether they were in favor of the addition of MENA, and then the subsequent columns asked the coder whether the comment agreed or disagreed with the individual statements proposed in the FRN.

Figure 1. Excerpt of public comment coding spreadsheet

MENA	In favor?	Q2a: is "MENA" understood and accepted?	Q2b: do examples represent MENA?	Q2c: does definition capture experience of MENA?	Q2 Notes

For each column, coders were tasked with indicating that a comment either was in agreement with the proposed change (Yes), was in agreement but had additional concerns (Yes w/info), was not in agreement (No), or was not in agreement and had additional comments or an explanation (No w/info). A "Notes" column was created for each larger FRN section to provide info if "w/ info" was marked in at least one of the columns. Some FRN questions were not asking for agreement or disagreement but were prompting for more information. In those cases, coders simply marked "yes" or "yes w/info" if the commenter had information. Lastly, an overall "Notes" column was created so that coders could input any information provided by the commenter that was relevant but did not fit into any of the specific FRN sections.

Comments were organized in the spreadsheet by a language model algorithm that clustered comments by similar themes or content. We used the clusters to sort first, then we alphabetized the comments within the clusters. This allowed us to find the letter writing campaigns more easily, since those comments tended to use the exact same comment text.

Two different language model algorithms were used and compared with each other. Comments were sorted by one model and then the second model within the spreadsheet. This allowed large letter writing campaigns to be placed next to each other in the spreadsheet and easily coded. Comments were appended to the spreadsheet in portions periodically, until the comment period concluded. As more packages of comments were entered into the spreadsheet, the algorithms were rerun to cluster comments using the increased amount of data. Once the number of comments became very large, the spreadsheet was divided into multiple, three smaller spreadsheets (one spreadsheet for letter writing campaigns identified by the clustering algorithms, one spreadsheet for unique comments, and one spreadsheet for comments that contained an attachment). Since the attachment comments could not easily be read by the algorithms, they could not be sorted into letter writing or non-letter writing campaign comments.

The clustering/sorting of comments was accomplished through three processes using the Python programming language. First, each comment was converted to a numeric representation (known as an embedding) using a large language model called *distilroberta-v1* and the sentence-transformers package. The embeddings for all comments were fed into two clustering algorithms to find commonalities or groupings. The KMeans algorithm (from the scikit-learn package), takes as an argument the number of clusters believed to be represented in the comments. Each comment was assigned to be in one of these clusters. At the beginning of the comment period, 15 was used for this argument. As the number and diversity of comments expanded, this was increased to 35 possible clusters. As a supplement to KMeans clustering, Hierarchical Density-Based Spatial Clustering of Applications with Noise (HDBSCAN) was used. HDBSCAN does not require the analyst to define a number of clusters beforehand. Instead, it uses

proximity of data points (in our case comments) in multi-dimensional space to define clusters on its own. HDBSCAN also allows for FRN comments to *not* be part of a cluster at all, that is, those that are distinct enough from others that they don't make sense to be included in a group.

Both KMeans and HDBSCAN cluster assignments were presented to human coders as columns in a spreadsheet. They were used to sort and filter the overall list of comments in order to put like comments near one another. HDBSCAN was useful for identifying letter writing campaigns with exact and near duplicate comments; for the most part leaving unclustered those comments that were written by individuals. KMeans was useful for identifying campaigns and, in some instances, identifying themes within the individual comments (e.g., those about MENA, those about ADOS, etc.).

Coders checked out cases by marking their name in a "coder" column and filling in the substantive columns for the comment. Review began before all the comments had been submitted, however, as time necessitated starting as soon as possible. Weekly meetings were held to discuss any coding questions or problems as they arose. Once all the comments had been rated, summary statistics were created in terms of "yes" or "no" responses. Additionally, a careful reading of the "Notes" column of each section allowed for summaries of the major concerns that commenters had with each topic.

Additionally, the Communications and Outreach Team was tasked with coordinating communications for presenting information to the public and reading, reviewing, and organizing agency feedback. This included virtual town halls where the public verbalized their feedback on the proposed changes, interaction with tribal leaders and stakeholders, creation of a website for the Working Group on the SPD 15 revision, coordination of presentations to professional associations, and continuation of the ongoing public listening sessions. During the public comment period, multiple engagements were conducted (e.g., town halls, a tribal consultation, and speaking engagements at conferences), and the Communications and Outreach Team summarized the feedback received at each of these.

4. FRN Comment Analysis

The Working Group received 20,255 public comments in response to the Federal Register Notice (FRN) published in January 2023: Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards. Public comments were received from individuals, educational institutions, researchers, health organizations, and federal, state and local agencies. The numbers shown below are as of April 27, 2023, which was the last date for comments to be submitted.

Proposal 1. Collect Race and Ethnicity Information Using One Combined Question
The majority of comments received were in favor of using a combined question to collect race and ethnicity data. Many comments stated that the current two question structure is confusing to respondents, especially those respondents who identify as Hispanic or Latino and do not identify with one of the current race groups. In addition, a few American Indian or Alaska Native (AIAN) and Native Hawaiian or Pacific Islander (NHPI) groups supported using a combined question (many of which are located or work with populations in Southern California) argued that not combining the questions promotes top coding of Multiracial and Multiethnic AIAN and NHPI individuals.

Some commenters opposed using a combined question. These majority of comments opposed to the use of a combined question expressed concerns about perceived loss of data for Afro-Latino respondents.

Please provide links or references to relevant studies that examine or test any impacts of collecting race and ethnicity information using separate questions compared to a combined question.

Some commenters provided links or references to relevant studies that addressed the impacts of collecting race and ethnicity information using separate questions compared to a combined question. Research from Pew Research Center and the Census Bureau were cited numerous times.

To what extent would a combined race and ethnicity question that allows for the selection of one or more categories impact people's ability to self-report all aspects of their identity?

Comments in support of the combined question cited the 2015 National Content Test (NCT) results and the idea that the separate questions are confusing for respondents. For example, one comment on this topic said:

> *The current two question format creates a serious impediment to the collection of accurate data on Latinos. This is because many Latinos cannot find a racial box that represents them and leave the question blank or answer "some other race," resulting in a large percentage of Latino racial responses being imputed...This impacts the legitimacy and utility of racial data for Latinos, but also means our country's "white" category has people who are not racialized as white in it, impacting our ability to look critically at racial disparities...The combined "Optimal Design" format gives us much better data on racial variation among Latinos.* (Excerpt from a comment by member of the public)

Few comments expressed concern about the wording for the question stem but were generally in favor of using a combined question. Suggestions included asking "how do you identify," dropping the word "race" from the question altogether, or otherwise ensuring that the concepts of race and ethnicity were not conflated.

Many of the comments opposed to the use of a combined question were concerned about the loss of data for the Afro-Latino population. They argued that combining the question was conflating two distinct concepts of race and ethnicity and that a large portion of Afro-Latinos would only identify as Hispanic or Latino and not provide a race. They often cited the 2015 NCT and argued that the study was not sufficiently conducted on a large enough/representative enough sample of Afro-Latinos. For example, a comment on this topic said:

> *It is our belief that this will contribute to undercounts in the Afro-Latino/a community. The Census Bureau's 2015 National Content Test (NCT) was inconclusive; however, it is very likely that Afro-Latino/a numbers did decrease and would continue to do so in the future. Imagine ten to twenty years from now. Imagine that most Hispanics will check the box and even write in a detailed origin (e.g., Puerto Rican, Mexican, Honduran, etc.), but nothing else about their race? Are we to assume that they all occupy the same racial status for civil rights enforcement? This potential change in our data infrastructure could have far-reaching, enduring and damaging consequences on our ability to document and eliminate anti-Blackness in Latino/a communities across a variety of policy domains, including voting rights, housing, employment, education and health care access.* (Excerpt from a large letter writing campaign opposed to use of a combined question)

Another theme in the comments arguing against the use of a combined question was an argument that "Latino is not a race," and that combining the two questions implied that this was the case. Few comments discussed a need for robust detailed categories if the standard adopted a combined question. "Mestizo,"

"Mulatto," "Indio," and "Pardo" were some examples given of the types of categories that would be necessary and understandable to individuals from Spanish-speaking regions of the Americas:

> *Among the Hispanic and Latino population there exists a historical blend of physical characteristics and races. As examples, terms like 'mestizo', 'mulato' or 'trigueño', depending on the jurisdiction, could provide an alternative for respondents who do not identify simply with Black and White. In the context of Puerto Rico, the term 'trigueño' is known as a description for those who identify themselves as having a mix of physical characteristics attributed to 'white, black and native indigenous.' In summary, it is important to provide a term that denotes a person whose racial description lies somewhere between White and Black. For explorative purposes last year, PRIS [Puerto Rico Institute of Statistics] provided the option of 'trigueño' to respondents in some studies it conducted. As a result, between 28% and 37% of the respondents identified with this option.* (Excerpt from letter by the Puerto Rico Institute of Statistics)

If a combined race and ethnicity question is implemented, what suggestions do you have for addressing challenges for data collection, processing, analysis, and reporting of data?

Some comments suggested a need to emphasize the instructions to "Mark all that apply" in a combined question (by making it bold or otherwise emphasizing the instructions), which would be imperative to ensure the Multiethnic and Multiracial Hispanic or Latino individuals could report their identities. A few comments expressed the importance of community engagement, including education about race and ethnicity, as well as education that respondents can mark all that apply. Specifically, a need to convey the changes to Spanish-speaking individuals was mentioned in a few comments. However, a few commenters were uncertain as to the best way to collect information on Multiracial and Multiethnic individuals.

What other challenges should we be aware of that respondents or agencies might face in converting their surveys and forms to a one question format from the current two-question format?

Few comments cited concerns about time constraints for updating the forms as well as budget constraints. A few comments expressed the need for data bridging or generally asked for guidance about how to apply changes. Some health agencies were especially concerned about having to retroactively change many records and roll out new forms across multiple surveys.

Proposal 2. Add ''Middle Eastern or North African'' (MENA) as a New Minimum Category

Nearly all comments on the topic of MENA expressed support for the addition of MENA as a minimum reporting category and used the term "Middle Eastern or North African (MENA)" or specifically agreed with use of the term.

In response to the question about whether the proposed nationality and ethnic group examples adequately represent the MENA community, there were several suggestions. This included a large letter writing campaign requesting a separate Armenian checkbox. Another large letter writing campaign suggested following the approach the Census Bureau typically adopts and reflects the largest groups that would ultimately be represented in the federal data.

Additionally, it was suggested that guidelines should be issued for the collection of detailed MENA data that treats the MENA region as one diverse geographical area and that detailed checkboxes be assigned to the largest groups by population in the U.S. (e.g., Lebanese, Iranian, Egyptian), while also using examples that include a transnational group (e.g., Assyrian, Chaldean), a Gulf population (e.g., Iraqi, Yemeni) and an Arabic-speaking country in Sub-Saharan Africa (e.g., Sudan, Somalia).

Some comments expressed concerns with how transnational groups would be represented. Comments suggested that additional examples of transnational groups should be provided. Some suggestions were to include checkboxes that were nationalities and checkboxes that were transnational groups as a guide for people.

Questions from the Federal Register Notice

Given the particular context of answering questionnaires in the U.S. (e.g., decennial census, Federal surveys, public benefit forms), is the term ''Middle Eastern or North African (MENA)'' likely to continue to be understood and accepted by those in this community? Further, would the term be consistently understood and acceptable among those with different experiences, i.e., those born in the U.S., those who immigrated but have lived for an extensive period of time in the U.S., and those who have more recently immigrated to the U.S.?

Nearly all of the comments that stated support for adding MENA as a minimum reporting category used the term "Middle Eastern or North African (MENA)" or specifically agreed with use of the term.

> *MENA communities have faced discrimination for decades with little to no protection from the government. We know that we experience voter suppression, discriminatory policing, inequitable access to government programs and services, but we cannot tell the stories because we are considered as White under Directive 15. It is time to #CountMENAIn* (Comment from a large write-in campaign)

A few comments mentioned that the term "Middle Eastern" is Eurocentric. Many of those mentioned that younger populations might prefer the term "SWANA" (Southwest Asia and North Africa) to MENA. A few comments suggested using the term "WANA" (West Asian North African):

> *I view the change in terminology to 'MENA' [Middle East & North Africa] as a step forward but getting it only half right. The Eurocentricity of 'Middle East' still remains [so the Middle and Far East are in relation to what?]. Why not go full geographic for consistency and cultural respect, using WANA instead: West Asia & North Africa* (Comment from member of the public)

> *Younger respondents might be using SWANA as a decolonial term. But for now, use MENA.* (Excerpt from comment from New York University Institute for Excellence in Health Equity)

Do these proposed nationality and ethnic group examples adequately represent the MENA category? If not, what characteristics or group examples would make the definition more representative?

Many comments asked for a clear definition of which groups are included in the MENA category. Some comments suggested individual groups be added or removed from the MENA category, including, for example, Pakistani, Iranian, Israeli, Turkish, Yemeni, Afghan, Iraqi, Islamic, Persian, and Central Asian countries. Some groups were suggested for both addition and removal by different commentors.

Many comments called for a separate Armenian detailed checkbox within a MENA category. These comments included letter writing campaigns, letters from Armenian organizations, and comments from federal, state, and local elected officials, many of whom represent districts in Southern California. The comments cited Armenian as being the third largest MENA group in the United States. A few comments questioned why Israeli was included as a detailed checkbox in the example questionnaire design, but not Palestinian. Comments expressed that if "Israeli" is included in the definition of MENA, "Palestinian" should be included as well. Commentors felt this could be construed as a political statement:

While the proposal for updating race and ethnicity statistical standards marks a critical achievement for the Southwest Asian and North African (SWANA) diaspora in the United States, there remain elements of racial discrimination and erasure within the proposal. Primarily the self-response data collection with detailed categories example, the inclusion of an "Israeli" box under the Middle Eastern and North African category and the omission of a "Palestinian" box is a clear attempt at erasing Palestinian identity and history within the American diaspora. (Excerpt from comment from a member of the public)

One campaign suggested a definition of MENA as well as a list of specific groups they wanted to see in the definition:

I do not believe that the proposed nationality and ethnic group examples provided in the Working Group's initial proposal adequately represent the MENA category. The examples listed should follow the approach the Census Bureau typically adopts and reflect the largest groups that would ultimately be represented in the federal data. As such, guidelines should be issued for the collection of detailed MENA ethnicity data that treats the MENA region as one diverse geographical area and that sub-boxes be assigned to the largest groups by population in the U.S. (e.g., Lebanese, Iranian, Egyptian), while also using examples that include a Trans-national group (e.g., Assyrian/Chaldean), a Gulf population (e.g., Iraqi, Yemeni) and an Arabic-speaking country in Sub-Saharan Africa (e.g., Sudan, Somalia). (Excerpt from a letter writing supporting the addition of a MENA category)

Other comments were concerned with how transnational groups would fit in a MENA category. Comments suggested that additional examples of transnational groups should be provided. Some suggestions were to include detailed checkboxes that were nationalities and detailed checkboxes that were transnational groups as a guide for respondents. Very few comments asked how respondents who identify as Jewish would fit in a MENA category, with some suggesting that one option would be to include those who are Ashkenazi Jewish in the White category.

Few comments suggested that MENA was too diverse a group to be put together. One example provided to support this was the following:

As a persian living in the United States I do not believe in the category of mena! And that's for several reasons the culture of our mother country, and the history of my country was wiped off by Arabs during their conquest. keep in mind we share no cultural or ethnic/racial ties with them and the Arabization of my land has caused so many people to escape their country and avoid the excruciating hardships it has caused because of the arabization. we Persians are considered caucasians Our language is Indo European based! it is not fair to have one simple category that mashes us in with other ethnicities and cultures, such as Arabs, or other people of the Middle East. The Middle East is not a racial categorization. It's an extremely diverse part of the world, and to have that added as a race category. Frankly, I think it's absurd. I do not wish to be counted as MENA under any circumstances… (Comment from a member of the public)

Would this proposed definition allow the generation of statistics necessary to track the experience and wellbeing of the MENA population?

This question was rarely specifically addressed, but the few responses were almost entirely positive.

Proposal 3. Require the Collection of Detailed Race and Ethnicity Categories by Default

Comments were received from individuals, educational institutions, researchers, health organizations, tribal entities, and federal, state, and local governments on the topic of requiring collection of detailed race and ethnicity categories by default for the collection of race and ethnicity information.

Most comments supported the collection of detailed race and ethnicity categories by default, citing the diverse experiences of members of each current minimum reporting category. In particular, a number of health organizations expressed the importance of having detailed race and ethnicity groups to measure disparate healthcare outcomes amongst members of these groups. The Association of Asian Pacific Community Health Organizations (AAPCHO) shared the following feedback on this issue:

> *AAPCHO supports the mandatory collection of detailed race and ethnicity data. Asian American and Native Hawaiian/Pacific Islander communities are incredibly diverse, having origins in more than 30 countries, comprising more than 50 ethnic groups, and speaking more than 100 different languages; each with their own complex histories and experiences. This diversity–and the starkly different experiences in nearly every aspect of social and economic life, from health and mental health, immigration, English language proficiency, income, poverty, employment, housing, and education–cannot be captured under the current minimum standard framework that only provides for broad categories of "Asian" and "Native Hawaiian" and "Other Pacific Islander." This aggregated data framework has had real and negative implications for our communities, often masking or completely erasing disparities within ethnic subgroups and perpetuating a 'model minority' myth that harms our ability to receive the resources and services we need and are entitled to.*

Comments opposed to the collection of detailed race and ethnicity data fell into three categories:

1. General opposition to the collection of any race or ethnicity data.
2. Concern that categories will create more division in general.
3. Support a write-in only approach, eliminating all disaggregated checkboxes.

While additional comments about concerns with implementing disaggregated data are included in the implementation section of this report, there was at least one university and one health system that expressed concerns with the burden of implementing expanded detailed race and ethnicity categories in their systems.

Questions from the Federal Register Notice
Is the example design seen in Figure 2 inclusive such that all individuals are represented?

Some comments agreed that the example shared in Figure 2 was inclusive, such that all individuals are represented. However, some comments indicated that respondents might identify with a detailed category, but not the larger minimum reporting category and be unsure about how to respond to the question. An example provided was of someone who identifies as both Black and French and the person would identify as French, but not as White, and therefore would be unsure which boxes to mark on a form.

Some comments, however, did not agree that the example shared in Figure 2 was inclusive and representative of all individuals. Commenters provided proposals for how Figure 2 could be restructured. For example, some suggested including an exhaustive list of AIAN tribes and adding detailed checkboxes

for additional Black or African American groups (Afro-Latino, American Descendant of Slavery, American Freedman, Black American, Caribbean, Continental Black, Foundational Black American, Sub-Saharan African), Hispanic or Latino groups (Afro-Latino, Brazilian, Mestizo, Indio, Mulatto), MENA groups (Armenian and Palestinian), and a Pacific Islander group (*Refaluwasch*). Some comments suggested to add new minimum reporting categories for Descendant of Slavery, Portuguese American, Italian American, and Multiracial/Biracial. There was also a proposal to use the term "European American" to either replace or combine with the White category. Additionally, some feedback received was to add an option for "Don't Know/Unsure."

The example design seen in Figure 2 collects additional detail primarily by country of origin. What other potential types of detail would create useful data or help respondents to identify themselves?
Many comments suggested that the standard be flexible enough for agencies to change the country of origin list as the U.S. population changes or based on which groups comprise a larger section of the population in certain areas of the country. Alternatively, comments advocated for using open ended write-in responses to capture changes in the demographic makeup over time. The Population Association of America (PAA) and Association of Population Centers (APC) shared the following about use of country of origin and the use of detailed race and ethnicity categories more generally:

> *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 deemphasize 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.*

Some Federal information collections are able to use open-ended write-in fields to collect detailed racial and ethnic responses, while some collections must use a residual closed ended category (e.g., ''Another Asian Group''). What are the impacts of using a closed-ended category without collecting further detail through open ended written responses?
The majority of comments regarding this proposal advocated for using an open-ended write-in field to collect detailed responses, as opposed to using the residual closed ended category. Reasons cited included allowing respondents to identify themselves in a way that resonated with them, as well as allowing for

diversity of responses in the residual category. Commenters also pointed out that an open-ended field would allow for flexibility if population distributions changed more rapidly than SPD 15 is reviewed and updated.

For comments that did not agree with using an open-ended write-in field, reasons cited were the considerable burden it places on agencies and organizations to process and potentially recode those responses and potential respondent burden when filling out forms.

What should agencies consider when weighing the benefits and burdens of collecting or providing more granular data than the minimum categories?

While most comments acknowledged the benefits of collecting and providing more granular data, including higher quality analysis for smaller groups, some of the burdens cited in the comments included concerns about data privacy and disclosure for members of smaller disaggregated groups, potential respondent burden for members of groups that do not have a dedicated checkbox and must write-in their response, and hesitance by members of the public to provide the data if they do not have a clear understanding of how it will be used. For example, one comment said:

> *Agencies and associated researchers should view surveys not just as a one-way transaction but as a way to spark a conversation with surveyed communities who need to understand the benefits, provide consent, and receive benefits. Agencies should collect the minimum-necessary data needed to meet a clearly identified use that will benefit the communities of color that are disproportionately represented in the data. Agencies should also pursue investments to build community data capacity to expand the ability of communities to use and benefit from publicly released data.* (Excerpt from the Urban Institute's submitted comment)

Is it appropriate for agencies to collect detailed data even though those data may not be published or may require combining multiple years of data due to small sample sizes?

Nearly all commenters who responded to this question agreed that agencies should collect detailed data even though those data may not be published or may require combining of multiple years of data due to small sample sizes.

What guidance should be included in SPD 15 or elsewhere to help agencies identify different collection and tabulation options for more disaggregated data than the minimum categories? Should the standards establish a preferred approach to collecting additional detail within the minimum categories, or encourage agencies to collect additional information while granting flexibility as to the kind of information and level of detail?

The main themes in this set of comments were the need for flexibility to change the disaggregated categories based on the population or geographic area being studied, and the need for implementation guidance (for both federal agencies and other parties that collect data that is used by federal agencies) on how to aggregate the detailed categories back up to the minimum categories.

Is the current ''default'' structure of the recommendation appropriate? Should SPD 15 pursue a more voluntary approach to the collection of disaggregated data, as opposed to having a default of collecting such data unless certain conditions are met?

Most of the commenters who responded to this question agreed with the "default" structure of the recommendation, which would require agencies to use the disaggregated categories by default unless certain conditions are met. Some commenters said that there should be no exceptions and that every

federal agency should have to collect the disaggregated data, while others stated that it would be too easy for OMB to grant exemptions.

For those that opposed using the default structure, they shared concerns about privacy, respondent burden (especially if the detailed data are not published), implementation, and the desire for customization of the detailed boxes based on the population being studied.

What techniques are recommended for collecting or providing detailed race and ethnicity data for categories with smaller population sizes within the U.S.?

The majority of comments on this topic suggested oversampling or pooling data across time periods to produce detailed race and ethnicity data for categories with smaller population sizes.

Proposal 4. Update Terminology in SPD 15

Questions from the Federal Register Notice

What term (such as ''transnational'') should be used to describe people who identify with groups that cross national borders (e.g., ''Bantu,'' ''Hmong,'' or ''Roma'')?

Comments that addressed terminology for transnational groups favored using the group names over umbrella terms like "transnational." At least one comment stated that they associate "transnational" as a descriptor for corporations, not people, and others implied use of the term "transnational" could be viewed as offensive by respondents.

If a combined race and ethnicity question is implemented, what term should be used for respondents who select more than one category? For example, is the preferred term ''Multiracial,'' ''Multiethnic,'' or something else?

While the FRN did not ask whether respondents who select more than one race should be aggregated into a "Multiracial" or "Multiethnic" category, many comments expressed concern that this aggregation would occur. Groups representing indigenous populations, such as Native Hawaiian and Pacific Islanders and American Indian and Alaska Natives, expressed that creating a "Multiracial" or "Multiethnic" category would further obscure statistics about these populations.

> *Using separate, overlapping racial and ethnic categories that count all individuals who report as each racial and ethnic group, either alone or in combination with another race and ethnicity, and when possible, divide each racial and ethnic category into two groups: 'alone' and 'in combination with another race and ethnicity'; and if overlapping categories are not possible, priority should be given to ensuring that data from small racial and ethnic groups that are likely to have high proportions of respondents reporting more than one race – such as NHPI, AIAN, or MENA – can be reported for a combined 'alone or in combination with another race and ethnicity' with other racial and ethnic groups reported as residual categories.* (Excerpt from the Native Hawaiian and Pacific Islander Data Policy Lab at the University of California – Los Angeles Center for Health Policy Research)

For those comments that did support aggregating individuals who select more than one category into a group, the preferred term is "Multiracial."

Commenters supported the removal of the terms "Far East" and "Other" from "Native Hawaiian and Pacific Islander." The majority of comments agreed with the proposal to remove "Negro" from the Black or African American category; however, some comments asked to retain the term because it appears on government records (such as birth certificates or prior Census records).

There were several comments that questioned why "White" and "Black" were the only categories using color while other categories were regionally based. Some of these recommended the addition of term "European" to the "White" description to tie the definition to geography, especially if a MENA category is added. Some commenters recommended clarifying that the term "African American" is only for respondents born in the United States of America (not South American or Caribbean countries), while some recommended separate categories for "Black American," "Caribbean American," and "Sub-Saharan African."

Some comments supported the use of the term "indigenous," either in place of, or in combination with "American Indian or Alaska Native," and there were some suggestions to add "original peoples of North, South, and Central Americas" to be inclusive of indigenous respondents from outside the U.S. to the definition. There was also a request to clarify that identifying as American Indian or Alaska Native is not the same as citizenship or membership in a Tribal Nation. Alternatively, some comments stated that "Native American" is fundamentally a legal designation, not a race/ethnicity.

There were also suggestions to add terms to the definitions of the categories, including adding "Bangladeshi" and "Bengali" to the Asian category and adding "Armenian" and "Palestinian" to the MENA category. Additionally, a few commenters suggested the addition of an "American" category, the removal of "Spanish" from the "Hispanic or Latino" description, and to emphasize "original peoples" in the NHPI category.

Most comments supported using the question stem "What is your race or ethnicity?" or "How do you identify?" without clear consensus around one question stem. Many comments also stated that the question must make it clear that the question is a "mark all that apply." Other suggestions were to use terms such as "ancestry" or "heritage" in the question stem.

Proposal 5. Guidance is Necessary to Implement SPD 15 Revisions on Federal Information Collections
Many of the comments on that focused on guidance were from organizations involved in the collection of health-related data, and many of the comments requested guidance on bridging and implementation generally without providing specific suggestions. Organizations requested general guidance and specific guidance on how to report data for respondents who check multiple boxes and on how to code write-in responses. For implementation, comments requested that information on when agencies would be able to use the minimum reporting categories versus detailed categories would be made available publicly. There were concerns that allowing agencies to use the minimum reporting categories would cause too many agencies to opt out of the detailed categories due to increased burden. Comments also cited

concerns with comparing data across agencies if different organizations or jurisdictions used different sets of categories.

Organizations shared that transitioning data collections and systems to a new standard will take time. Tasks associated with the transition include staff training, updates to existing computer systems, updates to other systems of records, etc.

The majority of comments regarding collecting proxy or observational data advocated against these forms of data collection and stated that if data was collected in this manner, it should be disclosed in data files and in publications.

Questions from the Federal Register Notice
For data providers who collect race and ethnicity data that is then sent to a Federal agency, are there additional guidance needs that have not been addressed in the initial proposals?

Commenters requested both general guidance and specific guidance on how to report data for respondents who check multiple boxes and on how to code write-in responses. Some expressed the need for publicly available information on when agencies would be able to use the minimum reporting categories versus detailed categories. Commenters also requested the standardization of race and ethnicity data collections across federal agencies.

Some commenters shared concerns that allowing agencies to use the minimum reporting categories would cause too many agencies to opt out of the detailed categories due to increased burden. Additionally, there were concerns from data users with comparing data across agencies if different organizations or jurisdictions use different sets of categories.

Some cautioned that transitioning data collections and systems to a new standard will take time. Tasks associated with the transition include staff training, updates to existing computer systems, updates to other systems of records, etc. It was noted that some use "Managing an identity crisis: Forum guide to implementing new federal race and ethnicity categories" a publication by the National Center for Education Statistics (NCES) as a guide and requested an updated version.

The Oregon Health Authority provided a list of detailed guidance recommendations for the Office of Management and Budget (OMB) to deliver to state agencies:

> *We recommend the following guidance for states:*
> 1. *Give each state the authority to determine which populations should be included in required race and ethnicity reporting, with the stipulation that this is done in collaboration with those most impacted by health and social inequities.*
> 2. *Size of local populations should not be the only criteria for inclusion. It is important to also consider smaller groups who are most impacted by health inequities. For example, we included "Somali" as a reporting category in Oregon due to outsize impacts of the COVID-19 pandemic on people who identify as Somali.*
> 3. *Create a combined Race/Ethnicity version of the Centers for Disease Control (CDC) race and CDC ethnicity codes and add a set of "local codes" that states could use for groups that are missing. In Oregon for example, two of our 39 categories are not reflected in the CDC race codes (Slavic, Somali). This would help states like Oregon use the CDC race/ethnicity codes already used by providers.*

4. Fund health systems to adopt and integrate SMART on FHIR extensions for each state's standards so that medical providers can bridge from their state's local standards to different reporting requirements.

5. Require reporting agencies to use the applicable state list to customize their reporting to federal entities for local populations.

6. Require periodic review and revision to state lists so standards adapt to the changing makeup of local populations. This recommendation has been successfully implemented in Oregon.

7. Encourage states to register and publish their statewide standards in FHIR.

8. Encourage states to revisit the local standards; in Oregon, we started with 34 categories in 2014, which increased to 39 categories in 2020.

With the proposals to use a combined race and ethnicity question and to add MENA as a minimum category, what specific bridging concerns do Federal data users have? Please submit any research on bridging techniques that may be helpful to the Working Group. Bridging refers to making data collected using one set of categories (e.g., two questions without MENA), consistent with data collected using a different set of categories (e.g., one question with MENA).

Comments on the topic of bridging were not very detailed and focused more generally on the need for guidance on how to bridge the data.

What guidance on bridging should be provided for agencies to implement potential revisions to SPD 15?

Comments on the topic of bridging were not very detailed and focused more generally on the need for guidance on how to bridge the data.

How should race and ethnicity be collected when some method other than respondent self-identification is necessary (e.g., by proxy or observation)?

Few comments addressed proxy identification of race and ethnicity data. These comments expressed general disagreement with collecting information by proxy. Comments stated that observational data is prone to error and should not be collected or used under any circumstance. A few comments suggested that data that includes proxy responses should be noted in publications and that data that is generated with proxy responses should indicate the presence of proxy responses.

What guidance should be provided for the collection and reporting of race and ethnicity data in situations where self-identification is unavailable?

Comments generally advocated against the collection of proxy or observational data and did not provide any suggestions for guidance.

Comments on Any Additional Topics and Future Research

The majority of comments that provided suggestions for future research responded to the question on the collection of data for respondents who identify as descendants of enslaved people.

SPD 15 does not dictate the order in which the minimum categories should be displayed on Federal information collections. Agencies generally order alphabetically or by population size; however, both approaches have received criticism. What order, alphabetical or by population size, do you prefer and why? Or what alternative approach would you recommend?

A few comments addressed the order of the categories, agreeing that the order of categories should be alphabetical, as this just seemed to be the easiest way to order the categories and would be the least likely to be seen as motivated by politics.

The current minimum categories are termed: American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, and White. Do you have suggestions for different terms for any of these categories?

Some comments discussed the minimum category terms. There were no prominent themes for specific changes. Some of the more common suggestions, some of which conflict with each other, included adding "Caribbean" and "Sub-Saharan African" categories, separate from "African American;" retire the term "African American;" remove "color" words (i.e., "Black" and "White") and replace with regional terms similar to the other categories; create "South Asian" and "Southeast Asian" categories, separate from "Asian;" and add categories related to mixed-Hispanic heritage, such as "Mestizo," "Afro-Latino," or "Trigueño."

A few commenters suggested broadening the classification for the "American Indian or Alaska Native" category to ensure that all indigenous people of the Americas felt comfortable answering, not just respondents who are native to the U.S. while others suggested removing "American Indian or Alaska Native" as a racial category:

> First, courts have long held that Native American is a political identity, not a racial identity. Since the early days of the Republic tribes have been viewed as separate sovereigns, and in Morton v. Mancari and subsequent decisions the Supreme Court made clear that tribes and tribal citizens are political and governmental—i.e., not racial—communities…Second, the Native American identity hinges entirely on a person's relationship with a federally recognized tribe. Citizens of federally-recognized tribes are Native American—those who are not citizens of federally-recognized tribes are not Native American…OMB should not include "American Indian or Alaska Native" as an answer to the question "What is your race," as once again, Native American is not a racial identity. Furthermore, if OMB wants an accurate look at the Native American population in the United States, it must limit the definition of "American Indian and Alaska Native" to citizens of federally-recognized tribes. A broader definition furthers misrepresentation by those men and women who falsely claim to be Native American. (Excerpt from letter by a representative of the Cherokee Nation)

How can Federal surveys or forms collect data related to descent from enslaved peoples originally from the African continent? For example, when collecting and coding responses, what term best describes this population group (e.g., is the preferred term ''American Descendants of Slavery,'' ''American Freedmen,'' or something else)? How should this group be defined? Should it be collected as a detailed group within the ''Black or African American'' minimum category, or through a separate question or other approach?

Nearly all comments on this topic expressed support for adding a category or question to collect data from descendants of enslaved people. There were multiple suggestions for which terms should be used to collect data on this population, including "Foundational Black American (FBA)," "American Descendant of

Slavery (ADOS)," "American Freedman or Freedman," "Black American, African American, and Negro or American Negro." There was no consensus on which term to use. Many of the comments advocated for a preferred term, and specifically stated that they absolutely did not want to identify with the other terms being suggested.

Some comments on this topic opposed the collection of data for descendants of enslaved people or against changing the current terminology/category, and some stated that the category is not needed. It was mentioned that this category is not inclusive since Black Americans were not the only historically enslaved people. Other commenters were concerned with how to verify that identification as a member of this group is accurate, and some were concerned that the addition of the category will cause confusion and make the Black community harder to count. For example, one comment on this topic said:

> *While there is a push to gather data or create a new category for American descendants of enslaved people from the African continent based on the premise of reparation, there is a grave concern that this untested proposal will harm the full and accurate count of Black people, particularly Black immigrants. There are no in-depth research and engagement with the diverse Black community on terminology, definition, and data collection and coding protocol, and implication on the counts of other Black diasporic populations (e.g., Black immigrants). Thus, we urge the Census Bureau and OMB to listen to and engage with trusted and reputable Black organizations on this issue.* (Excerpt from letter by the National Urban League and the Coalition on Black Civic Participation)

The proposals in this FRN represent the Working Group's initial suggestions for revisions to SPD 15 to improve the accuracy and usefulness of Federal race and ethnicity data. The Working Group and OMB welcome comments and suggestions on any other ways that SPD 15 could be revised to produce more accurate and useful race and ethnicity data.

A few commenters made other suggestions, and there were some common themes. A few comments suggested adding a checkbox for people who do not to identify with any group. There was also a request to increase the maximum characters in the write-in field for American Indian or Alaska Native category. One of the larger themes across some of the comments was a need to explain to the respondent how data will be used because disenfranchised groups are at times wary of how the government collects their data. These comments stated that there is also a need for educational tools for community members for where the data go and how to answer. A suggestion was also made to establish a scientific advisory committee on data equity, similar to the Census Bureau's advisory committees.

5. Listening Sessions, Town Halls, and Tribal Consult Comment Analysis

Overview

The Working Group hosted 94 virtual public listening sessions between September 15, 2022, and September 21, 2023, where presenters provided comments on various issues related to revising SPD 15. Participants included community organizations and advocates, academic institutions and researchers, private companies, state and local governments, and the public.

There were three town halls that were each three hours long, where over 200 verbal comments were heard by the Working Group. Each commenter was given two minutes to comment to ensure enough time was given for the comment but also to allow for as many commenters as possible. Over 3,500 callers listened to the town halls. The Working Group also worked with OMB's Tribal Advisor to arrange a tribal consultation with tribal leaders. This was more formal and not done in previous reviews of SPD 15.

Comments from the listening sessions, town halls, and the tribal consultation focused primarily on six broad topics:

1. **Question Format** – focused on whether race and ethnicity information should be collected using two separate questions versus one combined question.
2. **Middle Eastern or North African (MENA) Category** – focused on whether MENA should be added as a new minimum reporting category that is distinct from all other reporting categories.
3. **Collecting Detailed Race and Ethnicity Data** – focused on whether SPD 15 should require and provide guidance on the collection and reporting of detailed data for race and ethnicity groups.
4. **Relevance of Terminology** – focused on several questions including rebalancing race and ethnicity category definitions and removing outdated or potentially offensive terms.
5. **Implementation Guidance** – focused on how to implement updates to SPD 15 on all censuses, surveys, and administrative forms.
6. **Reporting Guidance for Administrative or Proxy Data** – focused on providing guidance on how to collect race and ethnicity data when self-identification is not possible on administrative forms.

Listening Sessions

The Working Group hosted 94 individual 30-minute Listening Sessions. These listening sessions provided an opportunity for members of the public to present their perspectives, opinions, and research directly to the members of the Working Group. The feedback provided during the listening sessions largely echoed the public comments provided in response to the FRN.

Question Format

Most presenters who commented on the question format agreed that race and ethnicity should be combined into one question. There was some concern that respondents may misinterpret the combined race and ethnicity question as implying MENA is a race category when it should be considered an ethnicity. Some presenters felt the need for additional clarification on the overarching purpose of the race and ethnicity categories, as well as maintaining a distinction between race and ethnicity. Additionally, some presenters stated that Hispanics/Latinos do not constitute a separate race because they can be of any race.

Many presenters recommended establishing a new ethnic designation that "allows persons who are slave descendants to reclaim their racial and ethnic identity" and that "OMB should consider adding a new ethnic designation for Black Americans/African Americans." However, there was not agreement across the various presenters on this topic as to the terminology that should be used or how the group should be defined.

Middle Eastern or North African (MENA) Category

Most presenters who commented on the MENA category agreed that it should be added as a category distinct from the White racial category. The major theme in support of adding MENA as a minimum reporting category was that the lived experiences of the MENA population is not reflective of a "White" racial identity. Presenters also felt that adding MENA as a minimum reporting category is important to reflect and promote self-identity. Additional supporters stated that "heterogeneity among Whites is rarely examined" and that "diversity among the White population is consequential in health and economic disparities." Some presenters advocated for specific groups to be included in a MENA minimum reporting category. However, some presenters

did not support the addition of a new minimum reporting category for the MENA population, "as they can be of many races."

Collecting Detailed Race and Ethnicity Data

Over half of the presenters who discussed this topic focused on whether there was a need for increased nuance and/or additional detail for the Black population. Specifically, presenters felt that SPD 15 should allow for a distinction between Black persons born in America from Black persons born elsewhere. Some presenters felt that broad terms such as "Black or African American" were historically used to describe Black Americans, while foreign African descendants should be identified by their country or continent of origin (e.g., Nigerian-American, Caribbean-American, Jamaican-American, Brazilian-American, or Latino/Latina-American). Despite the strong desire for more detailed data to disaggregate the Black or African American category, there was no consensus on the preferred terminology to refer to those who were descendants of slavery.

Relevance of Terminology

Some presenters suggested that OMB implement clear and consistent definitions of race and ethnicity that align across all federal agencies, and SPD 15 should focus on reducing ambiguity and vagueness in race categories to improve the accuracy of the data collected. Presenters shared that having more specific data options may reveal nuances in data outcomes for various subgroups and reduce confusion for individuals who do not see themselves clearly represented in the existing categories. Presenters also shared that outdated terms can be off-putting for respondents and may negate the aim of asking for race and ethnicity data. Other presenters advocated for removing the collection of race data altogether and only collecting data on ethnicity.

Implementation Guidance

Some presenters provided input on issues related to Implementation. For example, commenters shared concerns that any changes or updates to terms may pose reporting challenges to the education community. Commenters encouraged OMB to anticipate and plan for capacity and logistical challenges ahead of any changes to help ensure the success of incorporating new terms in reporting requirements and suggested that OMB potentially allocate resources to supporting the field as they adopt the new terms. Commenters also suggested that OMB invest in messaging why these changes are being made to help increase buy-in.

Reporting Guidance for Administrative or Proxy Data

A few presenters provided feedback on issues related to reporting guidance for administrative data. These comments suggested that OMB offer guidance or clarification around DNA or genetic tests and self-identification. There were also requests for guidance when self-identification is not possible and how the combined race/ethnicity question will impact reporting of Hispanic, and subsequently, trends. Some comments suggested that there be consistency across all federal surveys, and increased specificity in terminology reinforces the initial aim of racial/ethnic disaggregation. Commenters shared that there is a desire for regular and timely updates to standards (e.g., updates every 5-10 years would increase data accuracy and transparency).

Additional Topics

Presenters were encouraged to share their perspectives on any aspect of the collection and use of Federal race and ethnicity data. The Working Group heard from individuals who advocated collecting data on how respondents are perceived by others rather than how they personally identify, advocates for the addition of a "Multiracial" category, advocates for a separate category for "Italian," distinct from the "White" category, individuals who expressed concerns about coding of write-in responses that do not correspond with the minimum category they select, advocates for the addition of a "Mulatto" category, advocates of collecting tribal affiliation separate from race and ethnicity, and advocates for avoiding describing populations as "transnational."

Town Halls

Several topics were discussed at the town halls, but two issues dominated the discussions: 1) the collection of disaggregated data for Black Americans who descended from slavery and 2) the inclusion of a detailed checkbox for the Armenian population within a new MENA minimum reporting category.

A large number of presenters discussed the collection of disaggregated data for Black Americans who descended from slavery. Presenters discussed various terminology on disaggregating and classifying Black or African Americans as "American Freedman," "American Descendants of Slavery" (ADOS), "American Negro," "Foundational Black American," or "Black American." There was no consensus on the preferred terminology. Many commenters advocated for adding "American Descendants of Slavery (ADOS)" while sentiments were split on the use of the term "Freedman" or "American Freedman." However, some presenters were not in favor of either ADOS or "Freedman," but still wanted some distinction for Black "immigrants" who were not descendants of American chattel slavery. There was also some support for continuing to include the term "Negro."

A large number of presenters supported the addition of a new MENA minimum reporting category and urged that it must include a detailed checkbox for the Armenian population. These commenters said that Armenian Americans currently do not see themselves in the current race/ethnicity definitions within SPD 15. The presenters said that the Armenian population is one of the largest MENA groups in the United States and represents a transnational MENA group and should be treated as such in data collections.

Tribal Consultation

At the tribal consultation, presenters shared concerns related to data collection on the American Indian and Alaska Native (AIAN) population. There was discussion about the importance of AIAN representation during policy development and there were questions about whether there was AIAN representation on the ITWG. There were also concerns about how data on the AIAN population would be captured when multiple selections are made. Some presenters provided suggestions for disaggregating data into the 574 federally recognized tribes (e.g., provide drop-down menus for electronic collection, leverage state and local entities that may have lessons learned). Finally, invitations to re-engage with the tribal community were offered, including a request to schedule another tribal consultation for tribal leaders who could not attend and suggestions that the ITWG consider attending scheduled tribal events.