

FEDERAL INTERAGENCY TECHNICAL WORKING GROUP ON
RACE AND ETHNICITY STANDARDS

Final Recommendations Report

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1. Executive Summary

Introduction

For more than 25 years, the U.S Office of Management and Budget's (OMB) 1997 Statistical Policy Directive No. 15, *Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD 15) has provided a common language to promote uniformity and comparability for data on race and ethnicity for the population groups it specifies.¹ Periodically, OMB reviews its Statistical Policy Directives to ensure the continued relevance and accuracy of Federal statistics.

In 2022, the Chief Statistician of the United States (CSOTUS), Dr. Karin Orvis, initiated the process to review and revise SPD 15.² Dr. Orvis implemented a revision process similar to those used for other trusted Statistical Policy Directives, designed to help ensure the rigor, validity, objectivity, and impartiality of the resulting recommended revisions, and included the steps to be followed:

- Review by an Interagency Technical Working Group (Working Group) of Federal Government career staff who represent programs that collect or use race and ethnicity data.
- Public stakeholder input on initial Working Group proposals through a Federal Register Notice (FRN).
- CSOTUS consideration of the recommendations of the Working Group, as well as public feedback, to develop a recommendation to OMB leadership.

This report presents the Working Group's final recommendations for revising SPD 15 and provides the rationale, research, and public feedback to support those recommendations. The report also describes any public concerns about the recommendations. The report is intended to inform OMB's decisions about possible changes to SPD 15, as well as to communicate to stakeholders, researchers, and the public the deliberative process and final recommendations of the Working Group.

Final Recommendations

The Working Group evaluated relevant research and engaged in a meaningful way with the American public and impacted Federal agencies to develop the following nine recommendations, presented in three sets, for revising SPD 15. The recommendations in this report were put to a vote and each received nearly unanimous support from the Working Group members.

- I. The Working Group developed a set of four revisions to improve the format and appearance of the race and ethnicity questions, the language used in SPD 15, and the definitions of the minimum categories.**

¹ U.S. Office of Management and Budget. (1997). Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. *Federal Register*, Vol. 62 (210). Retrieved from: <https://www.govinfo.gov/content/pkg/FR-1997-10-30/pdf/97-28653.pdf>.

² Orvis, K. (2022, June 15). Reviewing and Revising the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. *The White House*. Retrieved from: <https://www.whitehouse.gov/omb/briefing-room/2022/06/15/reviewing-and-revising-standards-for-maintaining-collecting-and-presenting-federal-data-on-race-and-ethnicity/>.

Recommendation 1: Collect race and ethnicity using a single combined race and ethnicity question, allowing multiple responses.

Combine the current separate questions on Hispanic or Latino ethnicity and race into a single combined race and ethnicity question that allows respondents to select one or multiple categories, and require the use of this single-question format for both self-response and proxy response. A single selection is considered a complete response (e.g., Hispanic or Latino respondents are not required to select an additional category), although respondents should be encouraged to provide multiple responses when appropriate [see Recommendation 4(c)].

Recommendation 2: Add “Middle Eastern or North African” (MENA) as a minimum reporting category, separate and distinct from the “White” category.

Add “Middle Eastern or North African” (MENA) to SPD 15 as a new minimum reporting category distinct from all other reporting categories. Revise the SPD 15 definition for the “White” category to remove references to “Middle Eastern or North African,” and classify and tabulate “MENA” responses under the new “MENA” category.

Recommendation 3: Require the collection of more detail beyond the minimum race and ethnicity reporting categories by default, unless an agency determines that the potential benefit of the detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality.

Require the collection of data on race and ethnicity with greater detail beyond the minimum reporting categories by default. In cases where agencies determine that the additional burden would outweigh the potential benefits of collecting detailed data, Federal agencies must use SPD 15's minimum reporting categories. In any circumstance, agencies are encouraged to collect and provide more granular data than the minimum reporting categories. Federal agencies are allowed flexibility to determine what additional data to collect in order to best meet program and stakeholder needs, provided that the detailed data aggregate into the minimum race and ethnicity reporting categories.

Recommendation 4: Update terminology in SPD 15.

The terminology in SPD 15 needs to be updated. A number of terms in SPD 15 are not well understood or are considered offensive by the public and/or members of the described groups. The language in SPD 15 should be updated throughout to ensure clarity, consistency, and relevance.

II. The Working Group developed a set of two recommendations on implementation and timing for adoption of the revised SPD 15.

Recommendation 5: Within 12 months, the head of each Federal agency that collects race and ethnicity data shall submit to OMB an Action Plan on Race and Ethnicity, which shall detail how the agency plans to reach compliance with the SPD 15 revision and shall identify anticipated challenges.

Require an Action Plan on Race and Ethnicity within 12 months of the publication of a revised SPD 15. Federal agencies are encouraged to use these action plans to make a department-level unified plan to comply with SPD 15, identify potential risks, and inform stakeholders of these plans. OMB should encourage agencies to share this information publicly. Statistical agencies may still create their own action plan alongside the unified department plan to provide more detail on various data collection efforts and dissemination plans.

Recommendation 6: For Federal agency-conducted or -sponsored data collections that include racial/ethnic information, the provisions of the revised SPD 15 are effective immediately for all new record keeping or reporting. All existing Federal agency-conducted or -sponsored data collection efforts shall be made consistent with a revised SPD 15 no later than four years after the FRN issuing the revised SPD 15 is published.

Existing Federal agency-conducted or -sponsored data collection efforts that include race and ethnicity shall be made consistent with the revised SPD 15 within 4 years of the publication of the revised SPD 15. New Federal data collections that include race and ethnicity will adhere to the revised SPD 15 immediately. This four-year timeline incorporates the one year to publish the action plan addressed in Recommendation 5 and an additional three years to implement that plan. The additional three years allows agencies until the next time the data collection effort must go through the Paperwork Reduction Act (PRA) renewal process to reach compliance with the revised SPD 15.³

III. Finally, the Working Group developed a set of three recommendations for improving the collection and reporting practices for race and ethnicity data.

Recommendation 7: When the collection of race and ethnicity is done through visual observation, the minimum reporting categories are required but the collection of detailed race and ethnicity is not required.

When collecting race and ethnicity data via visual observation, the minimum reporting categories are required but the collection of detailed race and ethnicity data are not. Respondent self-identification should be facilitated to the greatest extent possible. But in some data collections, it is necessary, more practical, or even the appropriate method for collecting race and ethnicity data through visual identification. However, it should be noted that when race and ethnicity data are collected through observation, several issues can arise, such as misidentification, observer bias, and masked heterogeneity within racial and ethnic groups, resulting in inaccurate data.

Recommendation 8: When data are not self-reported, agencies are encouraged to transparently describe how the data were collected or generated, and how nonresponse or other missing data were assigned or allocated.

Federal agencies are encouraged to transparently describe the data collection and processing methods used when race and ethnicity data are not self-reported. Federal agencies and researchers should make it a practice to identify when data collections of race and ethnicity are intentionally designed to collect proxy responses, observational data, and employ a combination of self-identification, visual observation, and other collection methods. At the record level, this

³ Public Law 104-13 (1995). Retrieved from: <https://digital.gov/resources/paperwork-reduction-act-44-u-s-c-3501-et-seq/>.

may require flagging or identifying the mechanism for generating race and ethnicity data—like imputation flags used by surveys—to aid in subsequent research-related activities.

Recommendation 9: With respect to tabulation, the seven minimum race and ethnicity reporting categories shall be treated co-equally. Additionally, the tabulation procedures used by Federal agencies shall result in the production of as much information on race and ethnicity as possible, including data on people reporting more than one race and/or ethnicity. However, Federal agencies shall not present data on detailed categories and specific Multiracial and Multiethnic populations if doing so would compromise data quality or respondent privacy.

The seven minimum race and ethnicity reporting categories shall be treated co-equally. Tabulation procedures used shall result in the production of as much information on race and ethnicity as possible, including data on people reporting multiple races and/or ethnicities. There are multiple ways to present race and ethnicity data. Three sample approaches are presented in this report (see page 33). The purpose of the analysis, sample size, structure of the data, and whether there is a need to maintain consistency with past approaches in order to show temporal trends are all issues that contribute to determining the most appropriate approach.

Additional issues for future research and requests to OMB for implementation guidance

The Working Group considered a number of additional topics but concluded there was not enough existing research to make a definitive recommendation at this time. Additionally, the Working Group is putting forward several requests for additional implementation guidance for OMB's consideration.

Additional issues for future research

- *Collecting data for Afro-descendent populations*
Further research needs to be conducted to examine how to clarify to respondents that the “Black or African American” category is an inclusive category for all Afro-descendent populations from the Black diaspora.
- *Disaggregation of Black or African American population groups*
Federal agency research and stakeholder engagement are needed on the collection of data on American descendants of enslaved people from Africa, including:
 - a. Which term should be used to describe this population. At present, there is no consensus on which term to use (e.g., “American Descendant of Slavery,” “American Freedmen,” or other terms).
 - b. The quality of resulting data. At present, there is little research on the ability and willingness of respondents to provide this information.
- *Understanding how respondents interpret the SPD 15 definitions*
The definitions for the minimum reporting categories refer to people with “origins in any of the original peoples of ...” Research needs to be conducted to understand how this language is understood by respondents and agencies, if it should be revised, and how any potential revisions would impact the ability of agencies to monitor and enforce civil rights laws.

- *Hispanic or Latino category and definition*
The recommended Hispanic or Latino definition continues to use references to “Spanish culture or origin.” This can cause confusion for respondents who are Latino but not of Spanish culture or origin (e.g., Brazilians). Future research, stakeholder engagement, and consultation on legal requirements are needed before considering any modifications to the construct of the Hispanic or Latino definition’s sole focus on “Spanish culture or origin.”⁴
- *Potential modifications to minimum category names*
Further research, stakeholder engagement, and consultation on legal requirements are needed to explore whether the names of minimum categories should be revised and, if so, how.
- *Understanding race and ethnicity constructs in various communities and languages*
Federal agencies should conduct qualitative studies to better understand and inform translation of the race and ethnicity question into different languages and consult with OMB on best practices.

Additional requests to OMB for implementation guidance

OMB should:

- Provide a central repository of guidance and SPD 15 background information on a public website that remains active across administrations and is updated as needed.
- Provide guidance on race and ethnicity data bridging and tabulation.
- Provide best practices to support agencies in adjusting to the new question format and collecting detailed race and ethnicity data.
- Release guidance on requesting an exemption from collecting detailed race and ethnicity information.
- Provide an expedited process for revising existing collections to meet the new SPD 15.
- Disseminate updated requirements for the PRA approval process and training to PRA officials, package creators, and reviewers.
- Address training for proxy and observer race and ethnicity identification.
- Work with agencies to help support their non-Federal data providers.
- Convene a new interagency technical working group as soon as possible to begin the next phase of work regarding implementing revisions to SPD 15.

Conclusion

The Working Group has considered existing and new research and evidence and feedback from the public and Federal agencies while developing final recommendations for revising SPD 15. It is important to recognize that the concepts of race and ethnicity are socio-political constructions that change over time as peoples’ experiences and perceptions of society change. The Working Group believes that adoption of the recommendations in this report will improve the quality and usefulness of the race and ethnicity data collected and published or used for programmatic purposes by Federal agencies.

⁴ Public Law 94-311 (1976). Retrieved from: <https://uscode.house.gov/statutes/pl/94/311.pdf>.

2. Introduction

In its statutory role, the U.S. Office of Management and Budget (OMB) issues Statistical Policy Directives on the Federal collection and reporting of information where the comparability of Federal information has been determined as essential for program use and policymaking. For more than 25 years, OMB's 1997 Statistical Policy Directive No. 15, *Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD 15) has provided a common language to promote uniformity and comparability for data on race and ethnicity for the population groups it specifies in SPD 15.⁵ SPD 15 was developed in cooperation with Federal agencies to provide consistent data on race and ethnicity throughout the Federal Government, including the decennial census, household surveys, and Federal administrative forms. Development of SPD 15 stemmed in large part from responsibilities to enforce civil rights laws. Consistent data were needed to monitor equal access in housing, education, employment, and other areas. This information is also used to inform policymaking at both the state and Federal level, for example congressional redistricting after the decennial census. For purposes of SPD 15, the race and ethnicity categories set forth are socio-political constructs and are not an attempt to define race and ethnicity biologically or genetically.

Periodically, OMB reviews its Statistical Policy Directives to ensure the continued relevance and accuracy of Federal statistics. In June 2022, the Chief Statistician of the United States (CSOTUS), announced that her office was beginning a formal review of OMB's SPD 15. An Interagency Technical Working Group (Working Group) of Federal Government career staff who represent programs that collect or use race and ethnicity data was convened by the CSOTUS.⁶ The Working Group was tasked with evaluating the evidence available about race and ethnicity measurement since SPD 15 was last updated, identifying and filling any gaps in that research, considering stakeholder views, and then advising OMB on revisions to SPD 15 that will improve the quality (including the accuracy, objectivity, relevance, and completeness) of the Federal race and ethnicity data, and thus the utility of the data for the broad set of applications across the government. The goal is for OMB to announce any revisions to SPD 15 by Summer 2024.

This report presents the Working Group's recommendations for changes to SPD 15 and provides the rationale, research, and public feedback to support those recommendations. The report is intended to inform OMB's decisions about possible changes to SPD 15, as well as to communicate to stakeholders, researchers, and the public the deliberative process and final recommendations of the Working Group.

3. Background

In October 1997, OMB issued *Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity*, which superseded the 1977 SPD 15. Since that time, several Federal agencies have conducted methodological research to better understand how use of SPD 15 informs the quality of

⁵ U.S. Office of Management and Budget. (1997). Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. *Federal Register*, Vol. 62 (210). Retrieved from: <https://www.govinfo.gov/content/pkg/FR-1997-10-30/pdf/97-28653.pdf>.

⁶ U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2023). *spd15revision.gov*. Retrieved from: <https://spd15revision.gov/content/spd15revision/en/about.html>.

Federal statistics on race and ethnicity. In addition, agencies have learned a lot about the implementation of SPD 15 since it was issued over two decades ago.

In 2014, OMB formed an Interagency Working Group for Research on Race and Ethnicity (Research IWG) to exchange research findings, identify implementation issues, and collaborate on a shared research agenda to improve Federal statistics on race and ethnicity. The Research IWG considered research conducted on: (1) the use of two separate questions versus one combined question to collect race and ethnicity, and changes to question phrasing to reduce race and ethnicity nonresponse, (2) the classification of a “Middle Eastern and North African” (MENA) group and establishment of it as a minimum reporting category that is distinct from the “White” category, (3) clarification of agency requirements and flexibilities for the collection of detailed race and ethnicity data, and (4) the terminology used for race and ethnicity classifications and other language in the current SPD 15. In 2016 and 2017, the Research IWG solicited public comment and delivered a set of findings and recommendations to OMB.⁷ However, revisions were not made to SPD 15.

In addition, in the context of the Equitable Data Working Group formed by Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and co-chaired by the Office of the CSOTUS and the Office of Science and Technology Policy, stakeholders raised strong concerns that the relevance, usefulness, and accuracy of SPD 15 should be improved.⁸ The first key recommendation in the Equitable Data Working Group final report is to “Revise the Office of Management and Budget (OMB) Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.”⁹

The Working Group built on the work of the previous Research IWG, incorporating more recent and existing research, analyses of 2020 Decennial Census results, and additional public comments and stakeholder engagement comments, to develop recommendations to OMB for revising SPD 15.

4. Review Process

OMB announced their formal review of SPD 15 in June 2022, with the goal of ensuring that SPD 15 better reflect the diversity of the Nation. The CSOTUS, Dr. Karin Orvis, instituted a revision process like those used for the development and revision of other trusted Statistical Policy Directives, which helped ensure the rigor, validity, objectivity, and impartiality of the resulting recommended revisions. The process to review and revise SPD 15 included four major phases: 1) establishing a Working Group;

⁷ U.S. Office of Management and Budget. (2016). Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. *Federal Register*, Vol. 81 (190). Retrieved from: <https://www.federalregister.gov/documents/2016/09/30/2016-23672/standards-for-maintaining-collecting-and-presenting-federal-data-on-race-and-ethnicity>; U.S. Office of Management and Budget. (2017). Proposals from the Federal Interagency Working Group for the Revision of the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. *Federal Register*, Vol. 82 (39). Retrieved from: <https://www.federalregister.gov/documents/2017/03/01/2017-03973/proposals-from-the-federal-interagency-working-group-for-revision-of-the-standards-for-maintaining>.

⁸ Biden, J. (2021, January). Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government. *The White House*. Retrieved from: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

⁹ Interagency Working Group on Equitable Data. (2022.) A Vision for Equitable Data: Recommendations from the Equitable Data Working Group. *The White House*. Retrieved from: <https://www.whitehouse.gov/wp-content/uploads/2022/04/eo13985-vision-for-equitable-data.pdf>.

2) the Working Group developing, and OMB publishing, initial proposals for revising SPD 15; 3) the Working Group developing and delivering to OMB final recommendations for revising SPD 15, while continuing to engage with the public and examine research; and 4) OMB's consideration of the Working Group's final recommendations and announcement of any revisions to SPD 15.

Phase I. The first phase focused on establishing the Working Group. Consistent with OMB's established process, the Working Group was composed of Federal career staff who represented programs that collect or use race and ethnicity data from across the Federal Government. The agencies on the Interagency Council on Statistical Policy, i.e., the 13 Principal Statistical Agencies; and the 24 agencies enumerated by the Chief Financial Officers Act; as well as the U.S. Equal Employment Opportunity Commission—selected for its reliance on race and ethnicity data—were invited to nominate representatives to the Working Group.^{10,11} OMB chaired, and the U.S. Census Bureau co-chaired, the Working Group.

The Working Group was tasked with developing a set of recommendations for improving the quality and usefulness of Federal race and ethnicity data. The focus was on developing recommendations on topics including, but not limited to:

- Whether the minimum reporting categories should be changed and how to best address detailed race and ethnicity groups in SPD 15;
- Whether updates should be made to the question format, terminology, and wording of the questions, as well as the instructions for respondents and associated guidance; and
- Whether guidance for the collection and reporting of race and ethnicity data can be improved, including in instances when self-identification is not possible.

During the development of the 1977 and the 1997 SPD 15, principles were developed to govern interagency deliberations. The Working Group continued this practice and established the following governing principles to guide its work.

Governing Principles of the Working Group:

1. *Race and ethnicity are socio-political constructs.* For purposes of SPD 15, the race and ethnicity categories set forth are socio-political constructs and are not an attempt to define race and ethnicity biologically or genetically.
2. *Respect individuals.* Respect for individual dignity should guide the processes and methods for collecting data on race and ethnicity; respondent self-identification should be facilitated to the greatest extent possible.
3. *Clear concepts and terminology.* To the extent practicable, the concepts and terminology should reflect clear and generally understood definitions that can achieve broad public acceptance.

¹⁰ National Center for Health Statistics. (2019, February). The Federal Statistical System. *Centers for Disease Control and Prevention*. Retrieved from: <https://www.cdc.gov/nchs/data/factsheets/the-federal-statistical-system.htm>.

¹¹ The CFO Council. (n.d.) CFO Council Members. *United States Chief Financial Officers Council*. Retrieved from: <https://www.cfo.gov/members/>.

4. *Comprehensive categories.* The racial and ethnic categories should be comprehensive in coverage and produce compatible, non-duplicated, exchangeable data across Federal agencies.

5. *Consider useful data aggregations.* Foremost consideration should be given to data aggregations by race and ethnicity that are useful for statistical analysis, program administration and assessment, and enforcement of existing laws and judicial decisions—bearing in mind that SPD 15 is not intended to be used to establish eligibility for participation in any Federal program.

6. *Consider State/local government data needs.* While Federal needs for racial and ethnic data are of primary importance, consideration should also be given to needs at the State and local government levels, including American Indian tribal and Alaska Native village governments, as well as to general societal needs for these data.

7. *SPD 15 sets forth minimum reporting categories.* SPD 15 should set forth minimum reporting categories; additional categories should be encouraged, provided they can be aggregated to the minimum reporting categories. The number of minimum reporting categories should be kept to a manageable size, as determined by statistical concerns and data needs.

8. *Consider operational feasibility.* A revised set of categories should be operationally feasible in terms of burden placed upon respondents and the cost to agencies and respondents to implement the revisions.

9. *Category changes are based on sound research.* Any changes in the categories should be based on sound methodological research and should include evaluations of the impact of any changes not only on the usefulness of the resulting data but also on the comparability of any new categories with the existing ones.

10. *Category revisions require a crosswalk.* Any revision to the categories should provide for a crosswalk at the time of adoption between the old and the new categories so that historical data series can be statistically adjusted and comparisons can be made.

11. *Changes are based upon an interagency collaborative effort.* Because of the many and varied needs, and strong interdependence, of Federal agencies for racial and ethnic data, any changes to the existing categories should be the product of an interagency collaborative effort.

12. *All racial and ethnic categories should adhere to public law.* All racial and ethnic categories, both established and potential, should be reviewed and constructed in a manner that adheres to public law.

Phase II. The second phase of the review process focused on developing initial proposals for revising SPD 15. This was achieved by examining existing evidence and leveraging the work of the 2014-2018 Research IWG. In addition, the Working Group began conducting bi-monthly listening sessions with members of the public, which allowed organizations, advocacy groups, academics, and the general public to share their perspectives and recommendations regarding SPD 15. The initial set of proposals developed by the Working Group included collecting race and ethnicity using a single question; adding a response category for “Middle Eastern or North African,” separate and distinct from the “White” category; and updating SPD 15’s terminology, definitions, and question wording. The Working Group

also developed a set of questions regarding various aspects of the proposals, implementation issues, and additional topics for which public feedback would be solicited. OMB published these preliminary proposals with the set of questions in a Federal Register Notice (FRN) and provided the public an opportunity to submit comments from January 27 through April 27, 2023.¹²

Phase III. The third phase of the process focused on developing and delivering to OMB final recommendations for revising SPD 15, while continuing to engage with the public and examine research. A major part of this phase included obtaining feedback from the public on the Working Group's initial proposals for revising SPD 15. A variety of approaches were used to raise awareness, conduct outreach, and encourage responding to the FRN. White House blogs were posted and agencies represented on the Working Group notified their own stakeholders about the FRN.¹³ The Working Group launched a website, [spd15revision.gov](https://www.spd15revision.gov), where the public could find the latest news and other information on the review of SPD 15, a link to the FRN, and answers to frequently asked questions. A submission to the FRN by members of the public was the official method of providing and recording feedback on the Working Group's initial proposals. Many submissions were made to the FRN (20,255), including a number of letter-writing campaigns advocating for various positions on the initial proposals.

Throughout this phase, OMB and the Working Group used additional methods of engagement in private and public settings. The Working Group continued its bi-monthly listening sessions with the public. Ninety-four listening sessions were held. These sessions only included the Working Group and the members of the public who requested the session and their invited guests. This provided a small-group setting where individuals could feel comfortable expressing their views on SPD 15 and make candid presentations to members of the Working Group. Recognizing a need for additional engagement with the public, OMB conducted three public town halls over the course of nine hours, which were webcast live on YouTube and posted on [spd15revision.gov](https://www.spd15revision.gov). About 3,550 people listened to the town halls, with over 200 people speaking and sharing their views on SPD 15 and the Working Group's initial proposals. The OMB Tribal Advisor hosted a tribal consultation with tribal leaders where the initial proposals were presented and discussed. In addition, the Working Group made numerous presentations to stakeholder groups and participated in sessions at professional association meetings and conferences (e.g., the Population Association of America Annual Meeting, a Leadership Conference on Civil and Human Rights Convening, and the U.S. Office of Minority Health Data Summit) to hear feedback on the preliminary proposals.

Another important activity during the third phase included conducting new research. Much of the available research used to inform the Working Group's initial proposals was based on testing conducted using a decennial census or American Community Survey environment, where "Some

¹² 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>.

¹³ Orvis, K. (2022, June 15). Reviewing and Revising the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. *The White House*. Retrieved from: <https://www.whitehouse.gov/omb/briefing-room/2022/06/15/reviewing-and-revising-standards-for-maintaining-collecting-and-presenting-federal-data-on-race-and-ethnicity/>; Orvis, K. (2022, August 30). OMB Launches New Public Listening Sessions on Federal Race and Ethnicity Standards Revisions. *The White House*. Retrieved from: <https://www.whitehouse.gov/omb/briefing-room/2022/08/30/omb-launches-new-public-listening-sessions-on-federal-race-and-ethnicity-standards-revision/>; Orvis, K. (2023, January 26). Initial Proposals for Revising Federal Race and Ethnicity Standards. *The White House*. Retrieved from: <https://www.whitehouse.gov/omb/briefing-room/2023/01/26/initial-proposals-for-revising-the-federal-race-and-ethnicity-standards/>.

Other Race” is a required minimum reporting category. Therefore, nearly ten agencies represented on the Working Group collaborated to conduct additional qualitative and quantitative research, including testing without the category “Some Other Race.”¹⁴ Agencies were able to conduct testing with individuals and households using a mix of qualitative and quantitative methods. In most of the qualitative studies, participants were presented with two versions of the combined question (exactly what was presented differed by testing agency). Respondents reported on their own self-identified racial and ethnic groups as well as reported for others within the household. Agencies were able to conduct testing with establishments - for example, schools, law enforcement agencies, and businesses - using a mix of qualitative and quantitative methods. In most of the qualitative establishment studies, participants were presented with two versions of the combined question (one with minimum reporting categories only, one with minimum reporting and detailed categories), which often prompted a discussion about the records that were available for the population of interest (e.g., students, staff, business owners), the limitations of those records, and the time and effort required to update them. This additional research helped inform the Working Group’s final recommendations.

Phase IV. The delivery of the Working Group’s final recommendations to OMB launched the fourth, and final, phase of the SPD 15 review process. The CSOTUS will consider the final recommendations of the Working Group, as well as public feedback, and develop recommendations for OMB leadership. OMB is expected to make decisions and announce any revisions to SPD 15 by the Summer of 2024.

5. Final Recommendations

The Working Group evaluated relevant research and engaged in a meaningful way with the American public and impacted agencies to develop the following nine recommendations, presented in three sets, for revising SPD 15. Each of these recommendations are based on rigorous research, received near-unanimous support from the Working Group, and saw strong public support during the Working Group’s public engagement. The following sections describe each of the final recommendations, the relevant research, and a summary of public input.

- I. **The Working Group developed a set of four revisions to improve the format and appearance of the race and ethnicity questions, the language used in SPD 15, and the definitions of the minimum reporting categories.**

Recommendation 1: Collect race and ethnicity using a single combined race and ethnicity question, allowing multiple responses.

The Working Group recommends combining the current separate questions on Hispanic or Latino ethnicity and race into a single race and ethnicity question that allows respondents to select one or multiple categories, and requiring the use of this single-question format for both self-response and proxy response. A single selection is considered a complete response (e.g., Hispanic or Latino respondents are not required to select an additional category), although respondents should be encouraged to provide multiple responses when appropriate [see Recommendation 4(c)].

¹⁴ U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 2. Testing Team Report.

Background

For data collected directly from respondents, the current SPD 15 requires two separate questions, with the question on ethnicity presented first, followed by the question on race. SPD 15 allows for the collection of data using a combined race and ethnicity question, if necessary, for observer-collected data and advises that multiple responses are encouraged, but one response is acceptable. The Working Group acknowledges that while most race and ethnicity data are collected using the two separate questions format, many of these data collections tabulate and present results in a manner that combine the results into a single format, where race and ethnicity categories are presented together, not separately. Revising SPD 15 to require the use of a combined race and ethnicity question will bring uniformity to the format for collecting, tabulating, and reporting race and ethnicity statistics.

Research

Evidence from empirical research finds that the use of separate race and ethnicity questions confuses and concerns many respondents who instead understand race and ethnicity to be similar, or the same, concepts. Numerous qualitative and quantitative research studies have found that many Hispanic or Latino respondents in the United States do not identify with any of the race options made available in the separate race question and often view their Hispanic or Latino identity as their “race.”^{15,16} Since 1980, responses to the decennial census in each subsequent decade have shown increasing non-response to the race question, confusion, and concern from the public about separate questions on ethnicity and race. Collectively, this has required that many agencies increase the use of imputation (or systematic estimation) of “race” data for many respondents who identify as Hispanic or Latino.

Although not part of SPD 15, the U.S. Congress has required that the U.S. Census Bureau’s decennial census and the American Community Survey (ACS) include a “Some Other Race” (SOR) category in the race question.¹⁷ A large and increasing percentage of Hispanic or Latino respondents to the decennial census and the ACS over the past several decades either did not report a race or were classified as “SOR;” this was after responding to the ethnicity question. Results from the 2020 Census showed that 43.5 percent of those who self-identified as Hispanic or Latino either did not report a race or were classified as “SOR” alone (over 23 million people).¹⁸ Multiple research studies for the decennial census and ACS (e.g., 2010 Alternative Questionnaire Experiment; 2015 National Content Test; and the 2016 American Community Survey Content Test) found that a combined race and ethnicity question, that presents Hispanic or Latino as a category co-equal with the race categories, reduces confusion and reduces “SOR” reporting by Hispanic or Latino respondents, with the majority reporting a Hispanic or Latino identity only.¹⁹

¹⁵ Porter, S., & Snipp, C. (2018). Measuring Hispanic Origin: Reflections on Hispanic Race Reporting. *The Annals of the American Academy of Political and Social Science*, Vol. 677: 140-152. Retrieved from: <https://www.jstor.org/stable/26582324>.

¹⁶ Hitlin, S., Brown, J., & Elder, G. (2007). Measuring Latinos: Racial vs. Ethnic Classification and Self-Understandings. *Social Forces* 86 (2): 587–611. Retrieved from: <https://www.jstor.org/stable/pdf/20430755.pdf>.

¹⁷ Public Law 109-108 (2005). Retrieved from: <https://www.congress.gov/109/plaws/publ108/PLAW-109publ108.pdf>.

¹⁸ Racial Identification of the Self-Reported Hispanic or Latino Population: 2010 and 2020 Censuses. (2023). *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/data/tables/time-series/demo/hispanic-origin/racial-identification.html>.

¹⁹ Compton, E., Bentley, M., Ennis, S., & Rastogi, S. (2013, February). 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>; Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>; Harth, J. (2017,

Other key research findings pertain to the combined race and ethnicity question and the Afro-Latino population. There was a concern after the 2010 Alternative Questionnaire Experiment results were released, that Afro-Latinos would not report as both “Black or African American” **and** “Hispanic or Latino” at the same rate when a combined race and ethnicity question was utilized. Quantitative research from large, nationally representative studies that oversampled key population groups such as the Hispanic or Latino and Black or African American populations, shed light on this issue. For example, the 2015 National Content Test included a sample of 1.2 million addresses, including Puerto Rico, and the methodology was designed to measure content testing differences for relatively small population groups. This enabled comparisons for groups such as Afro-Latinos, detailed groups being considered for the “Middle Eastern and North African” category, and detailed groups in multiple communities. In terms of Hispanic or Latino respondents who identified as Black or African American alone, these studies found no significant differences when comparing separate race and ethnicity questions with all combined question formats tested.²⁰

However, small cognitive studies (fewer than 20 participants) conducted by Federal agencies during the Spring and Summer of 2023 found mixed results for Afro-Latinos. Those who reported that they were both “Hispanic or Latino” **and** “Black or African American” during the initial screening for the study were considered to be Afro-Latino participants. One study found that, when presented with the combined race and ethnicity question, half of the Afro-Latino participants chose only one option (“Hispanic or Latino”). Another study presented Afro-Latino participants with a combined race and ethnicity question with the addition of the phrase “People of African Descent” listed as an example for the write-in area under the “Black or African American” category. This study also found that about half did not report “Black or African American” when presented with a combined race and ethnicity question. Afro-Latino participants in these studies expressed different reasons for only selecting “Hispanic or Latino” such as they saw themselves primarily as Hispanic or Latino, their heritage is complex and reporting of race and ethnicity is fluid, or they did not notice the instruction to “Mark all that apply.” While the Afro-Latino participants in these cognitive studies found that the combined race and ethnicity question was not burdensome or difficult to answer, there was variation in how they chose to identify racially and ethnically. Future research directions should include increased sample sizes for continued cognitive testing and quantitative evaluation of terms designated to elicit race and ethnicity responses from Afro-Latino respondents.

Federal agencies conducted additional qualitative and quantitative testing during the Spring and Summer of 2023 with individuals, households, and establishments to explore how the combined question format without a “Some Other Race” category would perform, as most Federal surveys do not include an option for “Other” or “Some Other Race.” The research showed that with a combined race and ethnicity question that did not include “Some Other Race” as a category, respondents were easily able to identify themselves with the format and category options provided. In general, across the board, the combined race and ethnicity question tested well, with little concern for respondent confusion. In most cases, respondents were able to accurately find and record race and/or ethnicity for themselves as well as proxies in a household setting. For

September). 2016 American Community Survey Content Test: Race and Hispanic Origin. *U.S. Census Bureau*. Retrieved from: https://www.census.gov/library/working-papers/2017/acs/2017_Harth_01.html.

²⁰ Ibid.

establishments (e.g., law enforcement agencies, colleges, and businesses), generally, there were no issues with a combined race and ethnicity question. There were some establishment participants who suggested that a single combined question would likely result in changes to the demographic distribution in the future (e.g., more people selecting “Hispanic or Latino” alone).

Summary of Public Feedback

Comments from the FRN, public listening sessions, and engagements with stakeholders demonstrate strong public support for a combined race and ethnicity question. Most comments submitted in response to the FRN that addressed the combined race and ethnicity question supported this proposal. Many comments stated that the current two question structure is confusing to respondents, especially those respondents who are Hispanic or Latino and do not identify with one of the current race groups. Some commenters expressed a perception that the current two separate questions format creates a serious impediment to the collection of accurate data on the Hispanic or Latino population. This is because many cannot find a racial category that represents them and leave the question blank or answer “Some Other Race,” resulting in a large percentage of Hispanic or Latino racial responses being imputed. A common theme was that the proposed change will improve the collection of data for the Hispanic or Latino population by reducing the number of respondents who leave the race question blank or are classified as “Some Other Race” when that option is available.

Some respondents to the FRN were opposed to the use of a combined race and ethnicity question and expressed concern about the potential loss of data about Afro-Latino respondents. It was argued that a combined race and ethnicity question conflates two distinct concepts and implies that Hispanic or Latino is now a “race.” Commenters believed that a combined race and ethnicity question would result in a large proportion of Afro-Latinos only identifying as Hispanic or Latino and contribute to an undercount of the Afro-Latino population. Some commenters felt that the 2015 National Content Test did not include a sufficiently representative sample of Afro-Latinos to draw conclusions about Afro-Latino reporting when a combined race and ethnicity question was utilized.

The Working Group proposes Recommendation 1 because it is based upon multiple studies that found that a combined race and ethnicity question reduces confusion and reduces “Some Other Race” reporting, especially for many Hispanic or Latino respondents who do not identify with any of the OMB race options.²¹ In addition, most comments about the combined question submitted to OMB’s FRN, and from public listening sessions and engagements with stakeholders, expressed strong support and referenced evidence that the combined approach will reduce confusion and result in more complete and accurate data on the Hispanic or Latino population. For more details

²¹ Compton, E., Bentley, M., Ennis, S., & Rastogi, S. (2013, February). 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>; Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>; Harth, J. (2017, September). 2016 American Community Survey Content Test: Race and Hispanic Origin. *U.S. Census Bureau*. Retrieved from: https://www.census.gov/library/working-papers/2017/acs/2017_Harth_01.html; U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 2. Testing Team Report.

on the research examined and public feedback received on the combined race and ethnicity question, see Annexes 1, 2, and 4.²²

Recommendation 2: Add “Middle Eastern or North African” (MENA) as a minimum reporting category, separate and distinct from the “White” category.

The Working Group recommends that “Middle Eastern or North African” (MENA) be added to SPD 15 as a new minimum reporting category distinct from all other reporting categories. Thus, the SPD 15 definition for the “White” category would be revised to remove references to “Middle Eastern or North African,” and MENA responses would be classified and tabulated as part of the new “MENA” category.

Background

Since SPD 15 was first issued in 1977, the Federal Government has defined “White” as people having origins in any of the original peoples of Europe, the Middle East, or North Africa. As part of a comprehensive review of SPD 15 during the mid-1990s, OMB considered a number of suggestions from the public to improve the accuracy and reliability of Federal race and ethnicity statistics, including the addition of a minimum reporting category for respondents identifying as Arab or Middle Easterner. At the conclusion of that review, agreement could not be reached among public stakeholders on the definition of this category (e.g., whether a new “Arab or Middle Easterner” category should be defined based on shared language, geography, etc.) nor which groups would be included in this category. As a result, an additional, minimum reporting category was not created. Instead, the 1997 SPD 15 advised that further research be done to determine the best way to improve data collection and reporting for Arabs and Middle Easterners.

Research

The Working Group considered both qualitative and quantitative research from Federal statistical agencies, as well as from researchers outside the Federal Government, while crafting the recommendation to add a “MENA” category. The 2010 Alternative Questionnaire Experiment focus groups found that most of the MENA participants did not view themselves as White and often selected “Some Other Race” on questionnaires. There was also strong agreement across participants in the study, regardless of race or ethnicity, that there should be a separate “MENA” category.²³ Another source of relevant research is the 2015 Forum on Ethnic Groups from the Middle East and North Africa. MENA community members, experts, and organization leaders were invited to provide feedback on data collection plans for MENA respondents in the 2015 National Content Test. Nearly all participants were supportive of a separate “MENA” category, citing reasons relating to health research, discrimination policy research, and community level data needs.²⁴ In 2017, cognitive interviews were conducted using a combined race and ethnicity

²² U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 1. Content Team Report.; U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 2. Testing Team Report.; U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 4. Communications and Outreach Team Report.

²³ Compton, E., Bentley, M., Ennis, S., & Rastogi, S. (2013, February). 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>.

²⁴ Buchanan, A., Marks, R., & Álvarez Figueroa, M. (2016, September). 2015 Forum on Ethnic Groups from the Middle East and North Africa: Meeting Summary and Main Findings. *U.S. Census Bureau*. Retrieved from: www.census.gov/content/dam/Census/library/working-papers/2015/demo/MENA-Forum-Summary-and-Appendices.pdf.

question that included “MENA” as a separate category. Many MENA respondents chose only “Middle Eastern or North African” when answering and discussed how they preferred it to the “White” category, which was often seen as not being an accurate representation of their race or ethnicity and rendered them invisible.²⁵

Quantitative research examined the use of a separate “MENA” category within a combined race and ethnicity question. A key study used to evaluate the inclusion of a distinct “MENA” category was the 2015 National Content Test. The study found that most MENA respondents identified as Middle Eastern or North African when the category was available and predominantly reported “White” or “Some Other Race” when the category was not available. The study concluded that the inclusion of a “MENA” category helps MENA respondents more accurately report their identities.²⁶ Research conducted by those outside the Federal Government suggests that people with a Middle Eastern or North African heritage are not perceived to be White, often do not perceive themselves to be White, and when provided the option, often select “Middle Eastern or North African” instead of “White.”²⁷ Researchers from the University of Toronto, the University of British Columbia, Washington University in St. Louis, and the University of Chicago conducted experiments to examine the racial identification and perceptions of Middle Easterners and North Africans. The results of this study were similar to the 2015 National Content Test findings, in that most MENA respondents selected the “MENA” category when it was available.²⁸

During the Spring and Summer of 2023, Federal agencies conducted additional research on the use of a separate “MENA” category. For research conducted with individuals and households, the findings were similar to previous studies. The research demonstrated that respondents were able to understand the phrase “Middle Eastern or North African.” The inclusion of the “MENA” category enabled respondents who identified with multiple races and/or ethnicity groups to select multiple responses (e.g., “MENA” and “White”). Reactions to the inclusion of a “MENA” category were generally positive among establishment survey respondents as well. However, currently, there are very few establishments that include this category as an option for individuals to select. As a result, adding this option will take significant investments of time, effort, and resources to implement.

The Working Group acknowledges that many stakeholders and community members have provided feedback on which specific groups should be classified as part of a “MENA” category. While the Working Group is not making a recommendation on an exhaustive list of groups that

²⁵ Wilson, S., & Dunston, S. (2017, June). Cognitive Interview Evaluation of the Revised Race Question, with Special Emphasis on the Newly Proposed Middle Eastern/North African Response Option. *Centers for Disease Control and Prevention*. Retrieved from: https://wwwn.cdc.gov/qbank/report/Willson_2017_NCHS_MENA.pdf.

²⁶ Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>.

²⁷ Chaney, K., Sanchez, D., & Saud, L. (2020). White Categorical Ambiguity: Exclusion of Middle Eastern Americans from the White Racial Category. *Social Psychological and Personality Science*, 12(5): 593-602. Retrieved from: <https://doi.org/10.1177/1948550620930546>.

²⁸ Maghbooleh, N., Schachter, A., & Flores, R. (2022). Middle Eastern and North African Americans May Not be Perceived, Nor Perceive Themselves, to be White. *Proc Natl Acad Sci U S A*, 119 (7). Retrieved from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8851556/>.

should be considered as Middle Eastern or North African, it recognizes the need for continued research on how groups self-identify when a “MENA” category is available. In particular, more research is needed to understand which minimum reporting category is selected by those who are Armenian, Somali, and Sudanese when a “MENA” category is available. The Working Group believes that the proposed MENA definition, along with Recommendation 3, allows sufficient flexibility for continued research and evolution of the collection and presentation of data on the MENA population under a revised SPD 15.

Summary of Public Feedback

Comments from the FRN, public listening sessions, and engagements with stakeholders demonstrate overwhelming public support for adding “MENA” as a minimum reporting category that is distinct from all other categories. Nearly all comments submitted in response to the FRN that addressed the “MENA” category supported the proposal. Commenters expressed that the current classification of MENA respondents as White does not reflect the reality of many who are MENA, and they provided both personal and societal reasons for their support. Many commenters also provided feedback about which groups should be considered MENA, commenting that it was important for groups such as Armenians, Somalis, and Sudanese to be part of any “MENA” category.

A few commenters were opposed to the addition of a new, minimum reporting category for MENA respondents, stating that some individuals from that region do consider themselves to be White or that race and/or ethnicity data should not be collected by the Federal Government.

The Working Group proposes Recommendation 2 because it has considered both qualitative and quantitative research from Federal statistical agencies, as well as from researchers outside the Federal Government. Studies showed that most MENA respondents selected the “MENA” category when it was available and that a “MENA” category leads to more accurate data for MENA respondents.²⁹ Further, many MENA respondents view their identity as distinct from the “White” racial category and stakeholders have advocated for collecting MENA information separate from White for over 30 years. In addition, comments from the FRN, public listening sessions, and engagements with stakeholders demonstrate overwhelming public support for adding “MENA” as a minimum reporting category that is distinct from all other categories. For more details on the research examined and public feedback received on the addition of a “MENA” category, see Annexes 1, 2, and 4.³⁰

²⁹ Wilson, S., & Dunston, S. (2017, June). Cognitive Interview Evaluation of the Revised Race Question, with Special Emphasis on the Newly Proposed Middle Eastern/North African Response Option. *Centers for Disease Control and Prevention*. Retrieved from: https://wwwn.cdc.gov/qbank/report/Willson_2017_NCHS_MENA.pdf; Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>; Maghbouleh, N., Schachter, A., & Flores, R. (2022). Middle Eastern and North African Americans May Not be Perceived, Nor Perceive Themselves, to be White. *Proc Natl Acad Sci U S A*, 119 (7). Retrieved from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8851556/>.

³⁰ Ibid.

Recommendation 3: Require the collection of more detail beyond the minimum race and ethnicity reporting categories by default, unless an agency determines that the potential benefit of the detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality.

The Working Group recommends requiring the collection of data on race and ethnicity with greater detail beyond the minimum reporting categories by default, unless an agency determines that the potential benefit of the detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality. In those cases, Federal agencies must use SPD 15's minimum reporting categories. In any circumstance, agencies are encouraged to collect and provide more granular data than the minimum reporting categories. Federal agencies are allowed flexibility to determine what additional data to collect in order to best meet program and stakeholder needs, provided that the detailed data can be aggregated into the minimum race and ethnicity reporting categories.

Background

Currently, SPD 15 states that “[t]he collection of greater detail is encouraged” when “any additional categories can be aggregated into the minimum standards.” While the collection of more detailed groups beyond the minimum reporting categories is encouraged, it is not currently required. SPD 15 states that as much detailed data should be tabulated as possible but that Federal agencies “...shall not present data on detailed categories if doing so would compromise data quality or confidentiality standards.” SPD 15 does not provide specific guidance on which additional disaggregated data categories should be collected. The minimum categories as described in the current SPD 15 are often misinterpreted as the only permissible reporting categories.

The minimum categories in SPD 15 contain heterogeneity, as evidenced by differences in a wide variety of outcomes for distinct groups within their definitions. The increasing demand for analysis that represents the diversity of the American public increases the need for race and ethnicity information disaggregated beyond, or more granular than, SPD 15's minimum reporting categories. The collection of disaggregated information already occurs in many circumstances; for example, some current information collections use detailed checkboxes and/or write-in fields to collect detailed race and ethnicity data. However, it is noted that collecting data using only the minimum reporting categories may be necessary when, for example, low response rates among population groups of interest lead to non-representative data, small sample sizes make estimates about disaggregated groups statistically unreliable, data is collected by proxy, or small cell sizes in data analyses and publications create privacy and confidentiality risks.

Research

Historically, Federal data collections that elicited detailed responses typically did so only for groups within the “Hispanic or Latino,” “American Indian or Alaska Native,” “Asian,” and “Native Hawaiian or Other Pacific Islander” minimum reporting categories. In recent years, there have been increasing requests from members within the White and Black or African American communities for all racial and ethnic groups to have the same ability to self-identify their detailed racial and/or ethnic identities and receive tabulations. Research and testing with individuals and households showed that when detailed responses were elicited, most respondents readily

provided this information.³¹ Further, a 2020 Pew Research Center survey found that most U.S. adults were willing and able to report more detailed race and ethnicity data beyond the SPD 15 minimum reporting categories.³²

The most recent 2020 Census results illuminate the robust reporting of detailed identities within all the SPD 15 minimum reporting categories and how much diversity and complexity our nation of over 330 million people has interwoven within its demographic composition.³³ The myriad ways in which individuals report their race and ethnicity were illuminated when the 2020 Census – for the very first time in a decennial census – afforded all individuals the opportunity to self-identify by providing dedicated write-in fields and examples for each of the OMB minimum reporting categories. The number of detailed responses increased from 55 million in the 2010 Census to 355 million in the 2020 Census, and hundreds of unique ethnicities, nationalities, tribes, and additional identities were successfully reported, coded, and tabulated.³⁴ This increase in detailed reporting is primarily attributed to improvements made to the 2020 Census questionnaire design, processing, and coding, which allowed respondents in all race and ethnicity groups to report their detailed identities.³⁵

During the Spring and Summer of 2023, Federal agencies conducted additional research with individuals and establishments on the collection of detailed race and ethnicity data. In general, few issues were noted with collecting self-reports of detailed race and ethnicity categories based on country of origin for individuals. However, in some research, for within household proxy reporting, the respondent either did not know the detailed information or was less likely to report it for another person. Additionally, in some cases, there was a lack of clarity on how to report for a U.S.-born child of an immigrant. Among establishment respondents, there was a strong preference for the combined race and ethnicity question that collected data for the minimum reporting categories only. Establishments advised that the minimum reporting categories would be easier to implement in their records formation and collection practices. In cases where an establishment respondent is providing race and ethnicity information on an individual by proxy, the respondent would be more likely to know the minimum reporting categories, but less likely

³¹ Compton, E., Bentley, M., Ennis, S., & Rastogi, S. (2013, February). 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>; Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>; Harth, J. (2017, September). 2016 American Community Survey Content Test: Race and Hispanic Origin. *U.S. Census Bureau*. Retrieved from: https://www.census.gov/library/working-papers/2017/acs/2017_Harth_01.html.

³² Cohn, D., Brown, A., & Lopez, M. (2021, May). Black and Hispanic Americans See Their Origins as Central to Who They Are, Less So for White Adults. *Pew Research Center*. Retrieved from: <https://www.pewresearch.org/social-trends/2021/05/14/black-and-hispanic-americans-see-their-origins-as-central-to-who-they-are-less-so-for-white-adults/>.

³³ Census Bureau Releases 2020 Census Data for Nearly 1,500 Detailed Race and Ethnicity Groups, Tribes, and Villages. (2023). *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/newsroom/press-releases/2023/2020-census-detailed-dhc-file-a.html>.

³⁴ Coritz, A., Peña, J., Jacobs, P., Rico, B., Hahn, J., Lowe Jr. R. (2023, September). Census Bureau Releases 2020 Census Population for More Than 200 New Detailed Race and Ethnicity Groups. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/library/stories/2023/09/2020-census-dhc-a-race-overview.html>.

³⁵ Marks, R., and Ríos-Vargas, M. (2021, August). Improvements to the 2020 Census Race and Hispanic Origin Question Designs, Data Processing, and Coding Procedures. *U.S. Census Bureau*. Retrieved from: www.census.gov/newsroom/blogs/random-samplings/2021/08/improvements-to-2020-census-race-hispanic-origin-question-designs.html.

to know the detailed categories. Some establishments commented on the need for flexibility, specifically to permit the collection of detailed race and ethnicity categories to meet their needs.

Summary of Public Feedback

Comments from the FRN, public listening sessions, and engagements with stakeholders demonstrate strong public support for the collection of more detail beyond the minimum race and ethnicity categories. The majority of comments regarding this proposal advocated for the collection of detailed race and ethnicity data. Comments cited the diverse experiences of members within each minimum reporting category. In particular, a number of health organizations expressed the importance of having data available for detailed race and ethnicity groups to measure disparate healthcare outcomes amongst members of these groups. There were also many comments that advocated for flexibility in SPD 15 to allow for changes in the specific detailed categories used as new data about the demographic make-up of the United States become available. Many urged that Federal agencies be allowed to adapt the detailed categories based on their specific data collection needs and contexts.

Few commenters were opposed to the requirement for the collection of detailed race and ethnicity information. However, some expressed concern with the burden of implementing expanded detailed race and ethnicity categories in their systems, the risks to data privacy and disclosure for small population groups, and respondent burden.

The Working Group proposes Recommendation 3 because SPD 15's minimum race and ethnicity reporting categories are very broad and can contain very heterogeneous detailed groups. Further, research shows that respondents readily provide detailed responses, and most U.S. adults are familiar with their origins.³⁶ Additionally, there is strong public support for the collection of more detail beyond the minimum race and ethnicity reporting categories. Comments expressed a demand for more detailed race and ethnicity data to support more focused analyses to better understand and address disparities. Figures 1 and 2 provide examples of how recommendations 1, 2, and 3 could be formatted in Federal data collections.³⁷ For more details on the research examined and public feedback received on the requirement to collect more detailed race and ethnicity data, see Annexes 1, 2, and 4.³⁸

³⁶ Cohn, D., Brown, A., & Lopez, M. (2021, May). Americans' Origins and Connections to their Families' Roots. *Pew Research Center*. Retrieved from: <https://www.pewresearch.org/social-trends/2021/05/14/americans-origins-and-connections-to-their-families-roots/>; Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>.

³⁷ Note that SPD 15 does not dictate the order in which the minimum categories should be displayed on Federal information collections. Additionally, the Working Group did not make a recommendation on the ordering of the minimum categories. Agencies generally order the categories alphabetically or by population size.

³⁸ Ibid.

Figure 1. Example of a Self-Response Question Design that Collects Race and Ethnicity Data Using the Minimum Reporting Categories.

What is your race and/or ethnicity?
Select all that apply. Note, you may report more than one group.

- AMERICAN INDIAN OR ALASKA NATIVE
- ASIAN
- BLACK OR AFRICAN AMERICAN
- HISPANIC OR LATINO
- MIDDLE EASTERN OR NORTH AFRICAN
- NATIVE HAWAIIAN OR PACIFIC ISLANDER
- WHITE

Figure 2. Example of a Self-Response Question Design that Collects Race and Ethnicity Data Using Minimum Reporting and Detailed Categories.

What is your race and/or ethnicity?
Select all that apply and enter additional details in the spaces below.
Note, you may report more than one group.

WHITE – *Provide details below.*

German Irish English
 Italian Polish French

Enter, for example, Scottish, Norwegian, Dutch, etc.

HISPANIC OR LATINO – *Provide details below.*

Mexican Puerto Rican Cuban
 Salvadoran Dominican Colombian

Enter, for example, Guatemalan, Spaniard, Ecuadorian, etc.

BLACK OR AFRICAN AMERICAN – *Provide details below.*

African American Jamaican Haitian
 Nigerian Ethiopian Somali

Enter, for example, Ghanaian, South African, Barbadian, etc.

ASIAN – *Provide details below.*

Chinese Filipino Asian Indian
 Vietnamese Korean Japanese

Enter, for example, Pakistani, Cambodian, Hmong, etc.

AMERICAN INDIAN OR ALASKA NATIVE – *Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Mayan, etc.*

MIDDLE EASTERN OR NORTH AFRICAN – *Provide details below.*

Lebanese Iranian Egyptian
 Syrian Moroccan Israeli

Enter, for example, Algerian, Iraqi, Kurdish, etc.

NATIVE HAWAIIAN OR PACIFIC ISLANDER – *Provide details below.*

Native Hawaiian Samoan Chamorro
 Tongan Fijian Marshallese

Enter, for example, Palauan, Tahitian, Chuukese, etc.

Recommendation 4: Update terminology in SPD 15.

The Working Group recommends that the terminology in SPD 15 be updated with the following changes:

- a) Remove “majority” and “minority” terminology from SPD 15, except when statistically accurate and used for statistical descriptions or when legal requirements call for use of the terms.
- b) Use “race and/or ethnicity” in the question stem.
- c) Use instructions that emphasize that reporting multiple categories is allowed (and encouraged), regardless of whether minimum or detailed reporting categories are collected. Explicit instructions that the respondent can select all that apply AND provide detailed reporting is helpful. For example:
 - i. In a self-administered instrument collecting the minimum reporting categories: “Select all that apply. Note, you may report more than one group.”
 - ii. In a self-administered instrument collecting detailed categories: “Select all that apply and enter additional details in the spaces below. Note, you may report more than one group.”
- d) Use “Multiracial and Multiethnic” in tabulations to represent people who identify with multiple minimum reporting categories.
- e) Provide balance for definitions and use six example groups to illustrate the breadth and diversity of the category. Additional recommended updates to the race and ethnicity definitions include:
 - i. Remove the phrase “who maintains tribal affiliation or community attachment” in the American Indian or Alaska Native definition, making this minimum reporting category’s definition consistent with all minimum reporting categories.
 - ii. Change “(including Central America)” to having “Central America” listed co-equally with North and South America in the American Indian and Alaska Native definition.
 - iii. Replace “Far East” with “Central or East Asia;” “Indian Subcontinent” with “South Asia” in the Asian definition.
 - iv. Remove “Negro” from the Black or African American definition.
 - v. Correct “Cuban” being listed twice in the Hispanic or Latino definition.
 - vi. Remove “regardless of race. The term ‘Spanish origin’ can be used in addition to ‘Hispanic or Latino’” from the Hispanic or Latino definition.
 - vii. Add “Middle Eastern or North African” as a minimum reporting category, distinct from and co-equal to all minimum reporting categories.
 - viii. Remove “Other” from the “Native Hawaiian and Other Pacific Islander” category label.
 - ix. Remove reference to “the Middle East, or North Africa” from the White definition and create a new minimum category for “MENA.”

SPD 15 race and ethnicity categories are socio-political constructs and are not an attempt to define race and ethnicity biologically or genetically. The recommended revised SPD 15 definitions for the seven minimum race and ethnicity reporting categories below improve the consistency of the definitions:

American Indian or Alaska Native. Individuals with origins in any of the original peoples of North, Central, and South America, including, for example, Navajo Nation, Blackfoot Tribe of the

Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, and Mayan.

Asian. Individuals with origins in any of the original peoples of Central or East Asia, Southeast Asia, or South Asia, including, for example, Chinese, Filipino, Asian Indian, Vietnamese, Korean, and Japanese.

Black or African American. Individuals with origins in any of the Black racial groups of Africa, including, for example, African American, Jamaican, Haitian, Nigerian, Ethiopian, and Somali.

Hispanic or Latino. Includes, for example, individuals of Mexican, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian, and other Spanish culture or origin.

Middle Eastern or North African. Individuals with origins in any of the original peoples of the Middle East or North Africa, including, for example, Lebanese, Iranian, Egyptian, Syrian, Moroccan, and Israeli.

Native Hawaiian or Pacific Islander. Individuals with origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands, including, for example, Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, and Marshallese.

White. Individuals with origins in any of the original peoples of Europe, including, for example, German, Irish, English, Italian, Polish, and French.

Background

A number of terms in SPD 15 are not well understood or have fallen out of favor, and in some cases are even considered offensive by the public and/or members of the described groups. The language in SPD 15 should be updated throughout to ensure clarity, consistency, and relevance. Although many respondents report according to the race and ethnicity categories presented in Federal data collections, SPD 15 itself may not be well understood by the public. For example, current definitions of race and ethnicity categories may be incomplete, unclear, inconsistent, or confusing. Respondents may not realize that they can report more than one race and/or ethnicity. Also, respondents may find certain terms to be outdated. These issues point to the importance of a review of terminology used in SPD 15 to ensure continued relevance and clarity.

Research

Engagement with stakeholders and data users about how to appropriately describe racial and ethnic groups and measures of diversity revealed inconsistent understandings of “minority” and “majority,” including which populations comprise these groups and that the terms are antiquated, pejorative, and not inclusive. Where possible, any use of “minority” or “majority” as describing a racial or ethnic group, including in data tables and data products, should be replaced with a more purposeful and specific descriptor. Only use “majority” and “minority” terminology when statistically accurate and used for statistical descriptions or when legal requirements call for the use of the terms. The Working Group acknowledges that options for replacing the terms “majority” and “minority” within data tables, data products, and presentations need to be developed as part of future implementation for Federal agencies as they begin adhering to a revised SPD 15.

Decennial census and ACS research suggests that some respondents are confused by the distinction between the terms “race,” “ethnicity,” and “origin” used in question stems. The research also suggests that some respondents stop reading the instructions “mark one or more” after the word “one.”³⁹ During the Spring and Summer of 2023, Federal agencies tested two versions of the combined race and ethnicity question stem: “What is your race or ethnicity” and “What is your race and/or ethnicity?” Quantitative results showed no significant difference between the two versions of the question, but qualitative results suggested that the “and/or” application may lead to more reporting of both race and ethnicity or multiple races or ethnicities. Federal agencies also tested different versions of the instructions that appeared after the question. These varied from (“Select all that apply AND enter additional details in the spaces below. Note, you may report more than one group.”) to a simplified version (“Select all that apply.”). Again, quantitative results showed no significant differences, but qualitative testing showed that the longer instruction did not hurt understanding in any way and may help clarify the intention that multiple ethnicity and race reporting is acceptable. It was observed that some respondents did not seem to see/read the instructions, whether the long or the short version was used, a finding that is consistent with past research. These findings relate to the use of English language forms via self-administered mode.

Given the use of a combined race and ethnicity question, the terms “Multiracial and Multiethnic” should be used in data tabulations to represent people who identified with more than one of the minimum reporting categories, rather than “Two or More Races.” Analysis of public feedback found that “Multiracial” is the preferred term when aggregating individuals who selected more than one category into a group. Use of the terms “Multiracial and Multiethnic” follows the premise that all minimum reporting categories are co-equal, and SPD 15 is not defining certain groups as “races” or “ethnicities.” Therefore, the reporting of multiple minimum categories represents “Multiracial and Multiethnic” responses. Note, the Working Group is not recommending that a “Multiracial and Multiethnic” *checkbox* be used for data collection; this recommendation applies to the use of the terms for data tabulations and presentations as a way of ensuring respectful and commonly understood terminology to describe the population who identifies with multiple race and ethnicity groups.

The Working Group acknowledges that every nationality, ethnicity, or transnational group from across the world should not be codified into the definitions for the minimum race and ethnicity reporting categories, in accordance with our guiding principle to facilitate self-identification to the greatest extent possible. Instead, the use of representative examples helps to provide guidance, but not exhaustive prescription for the categories. This allows for future research to examine reporting patterns of groups who may not be clearly defined in SPD 15 definitions, to understand where and how they self-identify and determine how best to code and classify the responses within SPD 15. The goal is to help inform future research on how individuals from some groups, who could potentially be listed in multiple categories, self-identify given the minimum reporting categories and their definitions.

³⁹ Mathews, K., Phelan, J., Jones, N.A., Konya, S., Marks, R., Pratt, B.M., Coombs, J., & Bentley, M. (2017, February). 2015 National Content Test Race and Ethnicity Analysis Report: A New Design for the 21st Century. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>.

Qualitative research and stakeholder engagement support making updates to SPD 15's race and ethnicity definitions. Focus group research found strong concerns about the language "who maintains tribal affiliation or community attachment" requiring an extra step for people to identify as American Indian or Alaska Native, which treats this population differently from other groups. This research also found that Central and South American indigenous groups were unsure if the "American Indian or Alaska Native" category was inclusive of them.⁴⁰ Other research found concerns that geographic references for the Asian category definition do not include Central Asia and that "Far East" and "Indian Subcontinent" are outdated and offensive terminology. The word "Other" in the "Native Hawaiian and Other Pacific Islander" category label has been viewed as offensive and stakeholders recommended removing it, as it may be considered pejorative and suggests that members of the group are not part of society but rather a group apart. Two phrases are recommended for removal from the Hispanic or Latino definition. The phrase "regardless of race" is not meaningful in the context of a combined race and ethnicity question. The phrase "The term 'Spanish origin' can be used in addition to 'Hispanic or Latino'" is recommended for removal to ensure consistency across Federal data collections in the minimum reporting category label used ("Hispanic or Latino").

Many Black or African American participants in qualitative research, including cognitive testing and focus groups, expressed that the term "Negro" is outdated and offensive language.⁴¹ Additionally, there has been engagement with Black organizations, scholars, and Federal advisory committees regarding similar concerns about this term. For example, the U.S. Census Bureau received strong public backlash for the term "Negro" being included in the "Black, African American, or Negro" category label used in the 2010 Census race question. There were numerous media articles and public concerns shared prior to the 2010 Census about this issue. This led to the U.S. Census Bureau Director issuing a statement acknowledging public concerns about including the term "Negro" in the race question and sharing plans for removing the term.^{42,43} The 2010 Alternative Questionnaire Experiment found no significant difference in the reporting of "Black or African American" when the term "Negro" was removed. The U.S. Census Bureau removed "Negro" from the race question for its surveys and censuses beginning with the 2014 American Community Survey. However, for data collections that use write-in fields, respondents may still report the term "Negro" or other terms that best represent their racial or ethnic identity.

Summary of Public Feedback

Comments from the FRN, public listening sessions, and engagements with stakeholders demonstrate strong public support for updating SPD 15 terminology. The removal of the phrase "who maintains tribal affiliation or community attachment" was supported by several key American Indian and Alaska Native organizations. Also, commenters called for greater clarity in which geographic areas would be referenced in the Asian definition. Comments from organizations that work with Central Asian populations in the United States explicitly requested

⁴⁰ Schwede, L., Terry, R., & Fernandez, L. (2014). Focus Group Research on Alternative Race Question Stems and Write-in Line Instructions for the American Indian and Alaska Native Race Category. U.S. Census Bureau.

⁴¹ Compton, E., Bentley, M., Ennis, S., & Rastogi, S. (2013, February). 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment. U.S. Census Bureau. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>.

⁴² Groves, R. (2010, January). The Word "Negro." U.S. Census Bureau. Retrieved from: <https://www.census.gov/newsroom/blogs/director/2010/01/the-word-negro.html>.

⁴³ Phillips, K. (2010, March). Census Chief Apologizes for 'Negro' Category. *The New York Times*. Retrieved from: <https://archive.nytimes.com/thecaucus.blogs.nytimes.com/2010/03/26/census-chief-apologizes-for-negro-category/>.

that Central Asia be included in the Asian definition. A number of public comments supported the replacement of the term “Far East” in the Asian definition and the removal of the term “Other” from the Native Hawaiian and Other Pacific Islander category label. Among those who submitted comments about SPD 15 terminology, the majority agreed with the decision to remove “Negro” from the Black or African American definition; however, some comments asked to retain the term as it appears on government records (such as birth certificates or prior decennial census records).

The Working Group proposes Recommendation 4 because a number of terms in SPD 15 are not well understood or are considered offensive by the public and/or members of the described groups. The results of quantitative and qualitative studies were examined while developing the specific changes recommended to update SPD 15.⁴⁴ In addition, comments from the FRN, public listening sessions, and engagements with stakeholders demonstrate strong public support for updating SPD 15 terminology.⁴⁵ For more details on the research examined and public feedback received on the terminology updates recommended for SPD 15, see Annexes 1, 2, and 4.⁴⁶

II. The Working Group developed a set of two recommendations on implementation and timing for adoption of the new SPD 15.

Recommendation 5: Within 12 months, the head of each Federal agency that collects race and ethnicity data shall submit to OMB an Action Plan on Race and Ethnicity, which shall detail how the agency plans to reach compliance with the SPD 15 revision and shall identify anticipated challenges.

The Working Group recommends requiring an Action Plan on Race and Ethnicity within 12 months of the publication of a revised SPD 15. Federal agencies are encouraged to use these action plans to make a unified plan to comply with SPD 15, identify potential risks, and inform stakeholders of these plans. Action plans should include the following:

- a) Specific information on how the agency will comply with SPD 15;
- b) Specific challenges to implementing revisions to SPD 15;
- c) Plans to work with any non-Federal data providers to help them meet the SPD 15 revision; and,
- d) Discussion of the impact of the SPD 15 revision on race and ethnicity data tabulation and publication.

Federal agencies’ action plans should be unified at the department level to support coordination and conversation within and across agencies. OMB should encourage agencies to publish this information publicly. Statistical agencies may still create their own action plan alongside the unified plan to provide more detail on various data collection efforts and dissemination plans.

⁴⁴ Compton, E., Bentley, M., Ennis, S., & Rastogi, S. (2013, February). 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment. *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/programs-surveys/decennial-census/decade/2010/program-management/cpex/2010-cpex-211.html>; U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 2. Testing Team Report.; Groves, R. (2010, January). The Word “Negro.” *U.S. Census Bureau*. Retrieved from: <https://www.census.gov/newsroom/blogs/director/2010/01/the-word-negro.html>.

⁴⁵ U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 4. Communications and Outreach Team Report.

⁴⁶ Ibid.

Background

When the revised SPD 15 is published, all Federal agencies and their information collections will be required to adhere to a revised SPD 15 as a means of providing uniform and comparable data on race and ethnicity. Program areas and information collections within agencies will need to collaborate on the development of a plan to come into compliance with the revised SPD 15. This will minimize disjointed sets of agency plans resulting in guidance that is inconsistent across and within Federal agencies.

Summary of Public Feedback

A number of public comments were in alignment with the recommendation to require agencies to make an Action Plan on Race and Ethnicity, as well as encourage the dissemination of the plan to the public. Some comments emphasized that the public needs easy access to information about the revised SPD 15, when and how agencies would implement the revisions, and how data collected using the revised SPD 15 would be utilized. It was also conveyed that state-level data providers need to understand when agencies will provide more information on how to comply with a revised SPD 15. Public comments also discussed how information about agencies' plans for implementing a revised SPD 15 will help them meet Federal standards in their own data collection efforts.

The Working Group proposes Recommendation 5 because there is a need for Federal agencies to develop a plan for complying with a revised SPD 15 to ensure discussion and collaboration within agencies and to provide transparency for the public. For more details on this recommendation, see Annexes 3 and 4.⁴⁷

Recommendation 6. For Federal agency-conducted or -sponsored data collections that include racial/ethnic information, the provisions of SPD 15 are effective immediately for all new record keeping or reporting. All existing Federal agency-conducted or -sponsored data collection efforts shall be made consistent with the revised SPD 15 no later than four years after the FRN issuing the revised SPD 15 is published.

The Working Group recommends a four-year timeline to comply with the revised SPD 15, which incorporates the one year to publish the action plan addressed in Recommendation 5 and an additional three years to implement that plan. The additional three years allows agencies until the next time the data collection effort must go through the Paperwork Reduction Act (PRA) renewal process to reach compliance with the revised SPD 15.⁴⁸ Agencies are encouraged to adopt the revised SPD 15 as early as possible. OMB should provide agencies with a streamlined process for seeking approval for these changes under the PRA.

Many Federal data collections depend upon race and/or ethnicity information that is collected, managed and maintained by non-Federal agencies. Non-Federal agencies will need time to make modifications to their collection procedures and internal information systems before they are required to begin reporting information by race and/or ethnicity to Federal agencies. Agencies are encouraged to include discussion of these impacts within their action plans and to publish a clear timeline for non-Federal agencies to begin reporting in line with the revised SPD 15.

⁴⁷U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 3. Implementation Guidance Team Report.; U.S. Office of Management and Budget Interagency Technical Working Group on Race and Ethnicity Standards. (2024). Annex 4. Communications and Outreach Team Report.

⁴⁸ Public Law 104-13 (1995). Retrieved from: <https://digital.gov/resources/paperwork-reduction-act-44-u-s-c-3501-et-seq/>.

Background

It is a significant undertaking for Federal agencies to implement changes to censuses, surveys, and administrative forms that collect race and ethnicity data. The Working Group notes that a revised SPD 15 will necessitate guidance for Federal agencies on topics such as statistical methods to connect data collected under the current SPD 15 with data collected under the revised SPD 15; obtaining approval under the PRA to revise existing race and ethnicity data collections; and best practices for communicating SPD 15 revisions to stakeholders. Agencies will also need to create separate guidance for their non-Federal data providers (e.g., states, private employers, and school districts) who report race and ethnicity data up to them. Further, guidance will need to be provided in a timely manner to ensure earlier compliance and data comparability.

Summary of Public Feedback

Public comments urged that having a specific time by which Federal agencies need to be compliant with the revised SPD 15 is very important. Federal agency delays in complying with the 1997 SPD 15 revision were seen as too long and confusing. On the other hand, it is recognized that there will be an adjustment period from the time SPD 15 is revised to when Federal data collection efforts can be conducted accordingly. Organizations shared that transitioning data collections and systems to a revised SPD 15 will require time to train staff, update existing computer systems, and update other systems of records, etc.

A specific timing consideration brought up by the public was about ensuring data consistency. Population totals and controls are important to derive estimates from surveys and to calculate rates in detailed populations. The public expressed concern about population controls and related population totals that follow a revised SPD 15 being used with a data collection effort that has not yet transitioned from the 1997 SPD 15. It was noted that while data bridging factors can help mitigate this situation, data misalignment can risk limiting the ability to study race and ethnicity in the population of interest.

The Working Group proposes Recommendation 6 because a clear timeline for Federal agencies to comply with a revised SPD 15 needs to be established. This will support timely race and ethnicity data comparability across Federal agencies. For more details on this recommendation, see Annexes 3 and 4.⁴⁹

III. Finally, the Working Group developed a set of three recommendations for improving the collection and reporting practices for race and ethnicity data.

Recommendation 7: When the collection of race and ethnicity is done through visual observation, the minimum reporting categories are required but the collection of detailed race and ethnicity is not required.

The Working Group recommends that only the minimum reporting categories be required when collecting race and ethnicity data through visual observation. Respondent self-identification should be facilitated to the greatest extent possible. But in some data collections visual identification is necessary, more practical, or even the appropriate method for collecting race and ethnicity data. However, it should be noted that when race and ethnicity data are collected

⁴⁹ Ibid.

through observation, several issues can arise, such as misidentification, oversimplification, observer bias, failure to correctly identify people who self-identify as Multiracial and/or Multiethnic, privacy invasion, and masked heterogeneity within racial and ethnic groups, resulting in inaccurate data. Federal agencies should use their discretion when collecting detailed race and ethnicity data when relying on observer identification.

Background

Proxy or observer identification refers to two methods that gather information about a person without direct interaction. *Proxy reporting* refers to the process by which a person knowledgeable of another's race and/or ethnicity responds on their behalf when the respondent is not available. While *observer identification* is based on the observer's perception of the most appropriate race and/or ethnicity category in which to report an individual. Race and ethnicity are multifaceted concepts that encapsulate more than just skin color or national origin. They involve language, culture, ancestry, and individual self-identification. Use of proxy reporting or observer identification methods can reduce these complex categories to overly simplistic or stereotypical labels. Given the issues associated with these two methods, it is essential to approach the collection of racial or ethnic data with sensitivity and respect. Self-reporting, where possible, tends to be a more accurate and respectful approach to identifying race or ethnicity in studies or surveys.

Summary of Public Feedback

Public comments about proxy reporting and observer identification were skewed toward prohibiting these data collection methods in place of self-identification of race and/or ethnicity. Several expressed how these forms of data collection are inherently biased. Some public comments emphasized that observational data collection is not *lesser than* self-identification, but instead is *different from* self-identification methods and provides answers to a different set of questions that may be of interest to the government (e.g., discrimination and bias).

The Working Group proposes Recommendation 7 because requiring the collection of detailed race and ethnicity data through visual observation could be considered insensitive and may introduce bias and negatively impact data accuracy. For more details on this recommendation, see Annexes 3 and 4.⁵⁰

Recommendation 8: When data are not self-reported, agencies are encouraged to transparently describe how the data were collected or generated, and how nonresponse or other missing data were assigned or allocated.

The Working Group recommends that Federal agencies and researchers should make it a practice to identify when race and ethnicity data collections are intentionally designed to collect proxy responses, observational data, and employ a combination of self-identification, visual observation, and other collection methods. At the record level, this may require flagging or identifying the mechanism for generating race and ethnicity data—like imputation flags used by surveys—to aid in subsequent research-related activities.

Agencies are encouraged to adopt the correct wording or labels for describing data collection processes (e.g., self-reported, proxy-reported, observer identification, etc.). For example, clarity

⁵⁰ Ibid.

in data collection methods would allow data users to discern whether data were collected for a household from a single respondent versus collected from each individual.

Background

When using proxy reporting or observer identification data collection methods, it is important to define what needs to be collected and employ the most appropriate method for data collection. It is also imperative to identify the intention for using these methods (e.g., avoiding missing data, investigating racial and/or ethnic discrimination, describing health care/service provision) and understand the limitations and potential bias inherent in these types of observations. While self-identification is the primary and common means of obtaining information about an individual's racial and ethnic identity, in some instances, the use of proxy reporting or observer identification may be necessary or more practical.

Summary of Public Feedback

Commenters expressed general disagreement with collecting race and ethnicity data by proxy or observation. Some commented that observational data are prone to error and should not be collected or used under any circumstances. A few comments suggested that data that includes proxy responses should be noted in publications and that data that are generated with proxy responses should indicate the presence of proxy responses.

The Working Group proposes Recommendation 8 because data users, and the general public, need to understand the methods used to collect or generate race and ethnicity data when self-reported data are not used. For more details on this recommendation, see Annexes 3 and 4.⁵¹

Recommendation 9: With respect to tabulation, the seven minimum race and ethnicity reporting categories shall be treated co-equally. Additionally, the tabulation procedures used by Federal agencies shall result in the production of as much information on race and ethnicity as possible, including data on people reporting more than one race and/or ethnicity. However, Federal agencies shall not present data on detailed categories and specific Multiracial and Multiethnic populations if doing so would compromise data quality or respondent privacy.

The Working Group recommends that the seven minimum race and ethnicity reporting categories be treated co-equally and that Federal agencies produce as much race and ethnicity data as possible, without compromising data quality or respondent privacy. Federal agencies are encouraged to provide tabulations using one or more of the three sample approaches below while complying with the requirement to report as much information on race and ethnicity as possible, including data for respondents who reported more than one race and/or ethnicity categories.

In one approach, individuals belonging to a particular racial or ethnic group (whether alone or in combination with another racial or ethnic group) are combined. For example, a respondent who reported being both "White" and "Black or African American" would fall into both the "White alone or in combination" category *and* the "Black or African American alone or in combination" category. This practice has been in place since the 1997 revision of SPD 15 and is useful if the goal is capturing all people who might face a given life experience (e.g., increased risk of a disease or discrimination). The percentages sum to greater than 100 percent because the response

⁵¹ Ibid.

categories are not mutually exclusive. An example of this method's tabulation of the proposed minimum reporting categories is shown below.

- American Indian and Alaska Native alone or in combination
- Asian alone or in combination
- Black or African American alone or in combination
- Hispanic or Latino alone or in combination
- Middle Eastern and North African alone or in combination
- Native Hawaiian and Pacific Islander alone or in combination
- White alone or in combination

Another approach separates those reporting one race and ethnicity from those reporting multiple races and ethnicities, and specifies the race and ethnicity make-up for some or all of those falling into the Multiracial and Multiethnic category. For example, an agency could report the following information: the seven minimum race and ethnicity reporting categories alone; race and ethnicity combinations meeting a specific population threshold or combinations of particular interest; and all additional combinations of multiple race and ethnicity groups. The percentages will sum to 100 percent because the response categories are mutually exclusive. An example of this method's tabulation of the proposed minimum reporting categories is shown below.

- American Indian and Alaska Native alone
- Asian alone
- Black or African American alone
- Hispanic or Latino alone
- Middle Eastern and North African alone
- Native Hawaiian and Pacific Islander alone
- White alone
- American Indian and Alaska Native **and** Hispanic or Latino
- American Indian and Alaska Native **and** White
- Asian **and** Native Hawaiian and Pacific Islander
- Asian **and** White
- Black or African American **and** Middle Eastern and North African
- Black or African American **and** White
- Hispanic or Latino **and** Black or African American
- Hispanic or Latino **and** White
- Middle Eastern and North African **and** Asian
- Middle Eastern and North African **and** White
- Native Hawaiian and Pacific Islander **and** Asian
- Native Hawaiian and Pacific Islander **and** White
- All Additional Multiracial and Multiethnic Groups

A third approach presents data for those reporting one of the seven race and ethnicity categories alone, and then combines respondents reporting multiple race and ethnicity categories into an aggregated "Multiracial and Multiethnic" category. While this approach is easy to implement, it does not sufficiently describe the specific racial and ethnic diversity of the population (e.g., over half of the population who identified as "American Indian and Alaska Native" and over half of the population who identified as "Native Hawaiian and Pacific Islander" would be assigned to the

“Multiracial and Multiethnic” group). Federal agencies should use this approach in conjunction with another approach to comply with the requirement to report as much information on race and ethnicity as possible, including data for respondents who reported more than one race and ethnicity category. The percentages will sum to 100 percent because the response categories are mutually exclusive. An example of this approach’s tabulation of the proposed minimum reporting categories is shown below.

- American Indian and Alaska Native alone
- Asian alone
- Black or African American alone
- Hispanic or Latino alone
- Middle Eastern and North African alone
- Native Hawaiian and Pacific Islander alone
- White alone
- Multiracial and Multiethnic

Background

Revising SPD 15 has significant implications for how Federal agencies present race and ethnicity data. The combined question format means that race and ethnicity categories need to be treated co-equally. The addition of “Middle Eastern or North African” as a minimum reporting category means that Federal agencies will need to include this category in their presentation of race and ethnicity data. The move away from the "Two or More Races" tabulation category means that agencies will need to present more information on individuals who select more than one race and/or ethnicity.

There are multiple ways to present race and ethnicity data. Three sample approaches were presented above. The purpose of the analysis, sample size, structure of the data, and whether there is a need to maintain consistency with past approaches in order to show temporal trends are all issues that contribute to determining the most appropriate approach.

Summary of Public Feedback

There were public comments requesting guidance on how to tabulate data for respondents who report multiple races and/or ethnicities. Also, there were some comments requesting guidance on how to code detailed race and ethnicity responses. Additionally, there were comments requesting guidance on how to bridge race and ethnicity data collected under a revised SPD 15 with data collected under the 1997 SPD 15.

The Working Group proposes Recommendation 9 because Federal agencies need to utilize tabulation approaches that sufficiently describe the specific racial and ethnic diversity that exists in Federal data collections. In particular, this includes presenting more information for people reporting multiple races and/or ethnicities. For more details on this recommendation, see Annexes 3 and 4.⁵²

⁵² Ibid.

6. Additional Issues for Further Research and Requests to OMB for Implementation Guidance

The Working Group considered a number of additional topics but concluded there was not enough existing research to make a definitive recommendation at this time. Additionally, the Working Group is putting forward several requests for additional implementation guidance for OMB's consideration. For more details on these topics, please see Annexes 1, 2, and 3.⁵³

Additional issues for further research

- *Collecting data for Afro-descendent populations*
Small cognitive tests conducted during the Spring and Summer of 2023 explored using the term “People of African descent” to help clarify to Afro-Latino respondents that the definition of the “Black or African American” category includes people from across the Black diaspora, whereas without this terminology some Afro-Latino respondents may interpret the category as being only for African Americans. The terms “Afro-descendent” and “Afro-descendiente” are widely used on censuses throughout Latin America (e.g., Colombia, Panama, Peru, Mexico, Argentina, etc.), which may be beneficial for U.S. Federal data collections. Further research needs to be conducted to examine how to clarify to respondents that the “Black or African American” category is an inclusive category for all Afro-descendent populations from the Black diaspora.
- *Disaggregation of Black or African American population groups*
Federal agency research and stakeholder engagement are needed on the collection of data on American descendants of enslaved people from Africa, including:
 - a. Which term should be used to describe this population. At present, there is no consensus on which term to use (e.g., “American Descendant of Slavery,” “American Freedmen,” or other terms).
 - b. The quality of resulting data. At present, there is little research on the ability and willingness of respondents to provide this information.

Advocates argue that these data are important for reparations and for disaggregating American descendants of enslaved people from Africa from other groups within the larger Black population. However, some have expressed concerns that the addition of a detailed reporting category for American descendants of enslaved people from Africa would lead to inaccurate data and undercounts of the Black population, particularly for Black immigrants. Federal agency research is needed on how best to collect data on this population and which term should be used to describe this population. In addition, stakeholder engagement is needed on this topic with civil rights organizations, leaders, and advocates.

- *Understanding how respondents interpret the SPD 15 definitions*
The definitions for the minimum categories refer to people with “origins in any of the original peoples of...” However, there has been much discussion within the Working Group of how well understood this terminology is by respondents and Federal agencies tasked with implementing the definitions. In today's modern world where people migrate, sometimes multiple times, how is “origins in any of the original peoples of...” defined and conceptualized, and does this concept

⁵³ Ibid.

still accurately help agencies measure race and ethnicity? Research needs to be conducted to understand how this language is understood by respondents and agencies, if it should be revised, and how any potential revisions would impact the ability of agencies to monitor and enforce civil rights laws.

- *Hispanic or Latino category and definition*

The recommended Hispanic or Latino definition continues to use references to “Spanish culture or origin.” The intent is for individuals of Spanish culture or origin to report in this category. In the 1997 SPD 15 revision, the category name “Hispanic” was expanded to “Hispanic or Latino” based on research, which showed that regional usage of the terms differed – “Hispanic” was commonly used in the eastern portion of the United States, whereas “Latino” was commonly used in the western portion. However, the terms “Hispanic” and “Latino” are not technically interchangeable. This can cause confusion for respondents who are Latino but not of Spanish culture or origin (e.g., Brazilians). Future research, stakeholder engagement, and consultation on legal requirements are needed before considering modifications to the construct of the Hispanic or Latino definition’s sole focus on “Spanish culture or origin.”⁵⁴

- *Potential modifications to minimum category names*

While the current recommendations for revising SPD 15 make significant strides towards more inclusive category definitions and accurate terminology, the recommendations do contain some problematic features. Chiefly, the minimum reporting category names are inconsistent. Two category names reference skin color (“White” and “Black or African American”), two reference geographic regions (“Asian”, “Middle Eastern or North African”), and the remaining two reference a mixture of geographic regions and ancestry (“Native Hawaiian or Pacific Islander”, “American Indian or Alaska Native”). This lack of consistency in the minimum reporting category names does not promote clarity in terms of which (if any) criteria should all people consider when reporting their race and ethnicity. Further research, stakeholder engagement, and consultation on legal requirements are needed to explore whether the names of minimum categories should be revised, and if so, how.

- *Understanding race and ethnicity constructs in various communities and languages*

Research is needed on the specific challenges in understanding the race and ethnicity categories and definitions that some immigrants to the United States may face, which can have implications for data quality. These challenges include linguistic, cultural, and cognitive barriers. Additionally, SPD 15 does not address how questions and concepts should be translated from English into other languages. Federal agencies should conduct qualitative studies to better understand and inform translation to different languages and consult with OMB on best practices.

Additional requests to OMB for implementation guidance

- *OMB should provide a central repository of guidance and SPD 15 background information on a public website that remains active across administrations and is updated as needed*

Information and guidance around a revised SPD 15 should go beyond just the final FRN announcing the revisions. OMB should create a separate, readily found location to be a repository of all new guidance, including additional information that is accessible to the public. Beyond related guidance documents, this location should include non-agency specific information such

⁵⁴ Public Law 94-311 (1976). Retrieved from: <https://uscode.house.gov/statutes/pl/94/311.pdf>.

as, for example, sample question formats with and without disaggregated data, sample tabulations for disseminating race and ethnicity data with a discussion on the strengths and weaknesses behind each option, etc.

This repository should be made available when the final FRN is posted announcing the SPD 15 revisions. This information will help Federal agencies write their Action Plan on Race and Ethnicity and upcoming new data collection efforts to adapt quickly to the revisions. The information in this repository will also need to be continuously updated as new information and best practices arise when relevant.

- *OMB should provide guidance on data bridging and tabulation*
As expected, Federal agencies stated that they will need bridging information to compare race and ethnicity data collected under the revised SPD 15 with data collected under the 1997 SPD 15. This was especially relevant and challenging with the 1997 SPD 15 revision, where respondents were given the option to select more than one racial category. Bridging challenges are expected to be unique but equally challenging with the recommended revisions to SPD 15. Federal agencies described the need and desire to have a race and ethnicity style guide to help them bridge between race and ethnicity data that follow the current SPD 15 with data that follow the revised SPD 15 and on how to report new race and ethnicity data.
- *OMB should provide best practices to support agencies in adjusting to the new question format and collecting detailed race and ethnicity data*
As agencies adjust to the new question format and collecting detailed race and ethnicity data, OMB can best support them by providing best practices. Some suggested categories of best practices include stratifying and analyzing data by race and ethnicity, alternative methods to use when self-identification is not possible before relying on observer identification, addressing and allocating missing responses, etc. These best practices should be kept in a central repository and, although aimed at Federal agencies, be publicly available.
- *OMB should release guidance on requesting an exemption from collecting detailed race and ethnicity information*
OMB should identify clear and objective criteria for agencies to rely upon when requesting an exemption from collecting detailed race and ethnicity data. In cases when an exemption is granted, Federal agencies will still be required to collect the seven minimum race and ethnicity reporting categories. Identifying such criteria could take the form of a checklist accompanied by a narrative supporting an agency's justification for requesting an exemption, in addition to how their current information collection plan will inform their future efforts to move closer to the new SPD 15 requirement or justification for why they will not move to this SPD 15 requirement.

The Working Group drafted a suggested starting point for a checklist that identifies reasons for justifying exemption from collecting detailed race and ethnicity data:

“Check all that apply as justification for exemption from collecting detailed race and ethnicity data:

- Small sample size
- Privacy concerns
- Overly burdensome
- Inconsistent with the purpose of the data collection/program
- Other

Explain the justification for exemption.”

- *OMB should provide an expedited process for revising existing collections to meet the new SPD 15*
OMB should provide guidance on an expedited PRA approval process for when an agency is revising only the race and ethnicity questions on existing data collections. This will allow agencies to update their race and ethnicity questions in a quick and low-burdensome way before their scheduled PRA renewal. Without a low-burdensome means of updating these collections, agencies may delay complying with the new SPD 15. Some ideas for expediting the process include having the change occur as a "non-substantive change" or bundling multiple data collections into a single package.

- *OMB should disseminate updated requirements for the PRA approval process and training to PRA officials, package creators, and reviewers*
OMB should have a plan to disseminate updated requirements for the PRA approval process and offer training to PRA officials, package creators, and reviewers. The update should point to a centralized place where SPD 15 will be kept across administrations and be distributed in a way that it can reach all involved in the PRA process.

- *OMB should address training for proxy and observer race and ethnicity identification*

Where observer identification is necessary, agencies will need to examine how they train data collectors to make observational determinations. Such training is needed to reduce bias, increase reliability, and increase appropriate use of these data collection methods. This training must also include data collection methods in cases where the observer does not know which race(s) and/or ethnicity(ies) to choose.

- *OMB should work with agencies to help support their non-Federal data providers*
Revising SPD 15 creates new requirements beyond Federal agencies. Many non-Federal organizations are required to regularly report data by race and/or ethnicity as part of statistical or programmatic collections. Agencies will need to answer questions from their non-Federal data providers and provide support both within and external to Federal grant programs. Questions will need to be addressed such as whether non-Federal data providers must update all existing records of racial and/or ethnic identification to reflect identification using the revised SPD 15; are there standardized aggregation routines or business rules that must be used if non-Federal data providers report aggregated data to Federal agencies; etc.

In order to promote consistency, OMB should coordinate information and outreach across all Federal agencies to their non-Federal data providers.

- *OMB should convene a new interagency technical working group as soon as possible to begin the next phase of work regarding implementing revisions to SPD 15*
While the Working Group has accomplished its mission of developing and delivering final recommendations for revising SPD 15 to OMB, more work on implementation guidance for Federal agencies is needed. A new interagency technical working group should be convened that will focus on developing more specific implementation guidance to assist Federal agencies as they transition to complying with the revised SPD 15. A new working group should be launched as soon as possible to begin this next phase of work regarding implementing revisions to SPD 15.

7. Conclusion

The Working Group has considered existing and new research and evidence and feedback from the public and Federal agencies, as well as recommendations from advocates, scholars, and researchers on all of the topics examined during this review of SPD 15. Evidence and feedback have helped to inform the Working Group's deliberations and development of final recommendations for revising and improving SPD 15 so that the collection, classification, and tabulation of demographic statistics for our nation better align with the ways in which race and ethnicity are understood and operationalized in the 21st century. Also, the Working Group stresses the importance of recognizing that the concepts of race and ethnicity are socio-political constructions that change over time as peoples' experiences and perceptions of society change. As a result, there has never been, nor likely will there ever be, a "perfect" or "final" way to collect information about race and ethnicity that all people agree upon. Rather, the information collection should reflect, as best as possible, the current ideas and understanding of race and ethnicity at the time of its use. Continual research efforts should be focused on documenting changes in socio-political constructions of race and ethnicity.

In the 26 years since the 1997 SPD 15 revision, there have been large societal, political, economic, and demographic shifts in the United States. During this time, Federal agencies have also conducted methodological research to better understand how use of SPD 15 informs the quality of Federal statistics on race and ethnicity. The Working Group believes that adoption of the recommendations in this report will improve the quality and usefulness of the race and ethnicity data collected and published or used for programmatic purposes by Federal agencies.