

April 12th, 2023

The Office of Management and Budget
New Executive Office Building
725 Seventeenth Street NW.
Washington, DC 20503

RE: Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards (OMB-2023-0001)

Rooted in LGBTQ+ liberation, Howard Brown Health provides affirming healthcare and mobilizes for social justice. Based in Chicago and serving people from all over the Midwest, we are one of the largest LGBTQ+ community health centers in the nation. As a federally qualified health center, Howard Brown provides comprehensive, high quality and affordable care—including primary care, behavioral health, mental health services, HIV/STI prevention, elder services and community outreach initiatives—to all of our patients, regardless of ability to pay. We envision a future where healthcare and transformative social policies actualize human rights and equity for all.

The Census is crucial in highlighting the unique lived experiences, disparities, and needs of people of color and their communities. Data from the Census is critical in ensuring that funding and critical services such as healthcare, food assistance, and housing reaches communities in need. As such, we will be discussing the importance of: 1) adopting a combined race and ethnicity question with the option to select one or more response categories; 2) adding a “Middle Eastern or North African” (MENA) option to the combined ethnicity/race question; and 3) requiring the collection of detailed race and ethnicity categories using open-ended write-in fields.

A combined race and ethnicity question with the option to select one or more response categories positively impacts people's ability to self-report all aspects of their identity.

There is a growing need to increase race and ethnicity response options as populations of Black, Indigenous, and people of color (BIPOC) increase in the United States. Providing more options for self-identification on a combined race and ethnicity question would reduce vagueness, confusion, or misidentification on surveys like the Census. One in seven people mark “some other race” (SOR) on the Census. This is especially common among Hispanic/Latinx communities, with some 45 million choosing the SOR option or writing in their own response.¹

This clearly demonstrates that the current methodology on the Census for collecting race and ethnicity data is not aligned with how people identify their own race and ethnicity. The two-step race and ethnicity question on the Census may actually restrict people's ability to accurately reflect their identities. People are first asked to answer a yes or no question about whether they have “Hispanic, Latino or Spanish origin,” and then they are asked to identify with one or more racial

¹ Wang, Hansi Lo. “1 In 7 People Are 'Some Other Race' on the U.S. Census. That's a Big Data Problem.” *NPR*, NPR, 30 Sept. 2021, <https://www.npr.org/2021/09/30/1037352177/2020-census-results-by-race-some-other-latino-ethnicity-hispanic>.

categories: White; Black or African American; American Indian or Alaska Native; Asian; Native Hawaiian or Other Pacific Islander; and some other race.² Having race and ethnicity separated into two distinct categories creates unique issues for Hispanic/Latinx people. According to a 2015 Pew survey, 67% of Hispanic/Latinx adults see being Hispanic/Latinx as part of their racial background, meaning they do not see an accurate option for themselves in the race categories provided by the Census and are forced to choose the SOR option.³

The addition of a combined race and ethnicity question allows for the complexity of identities individuals inhabit to accurately be reflected on the Census. The default understanding of race and ethnicity in the U.S. usually reflects norms about race created and maintained by non-BIPOC individuals and does not consider the social, cultural, regional, linguistic, and regional realities that play into racial and ethnic identities. Hispanic/Latinx communities have spoken out that combining the race/ethnicity questions and allowing people to identify Hispanic as their race on the Census more accurately reflects their culture and lives, and we are pleased that the Census is listening. In 2015, the Census Bureau tested merging the race and ethnicity questions into one, showing this could help to address the increasing number of people leaving the race question unanswered or checking off the SOR option. When testing a combined ethnicity and race question the proportion of people who identified as Hispanic and SOR dropped from 4.4% to 0.1%, and the proportion of people who identified as Hispanic alone increased from 0.4% to 8.9%.⁴ Providing a combined race/ethnicity question on the Census is vital in collecting the most accurate data to account for the variety of ways that individuals identify their race and ethnicity.

Adding a “Middle Eastern or North African” (MENA) option to the combined ethnicity/race question helps collect accurate and usable data for this population.

The current Census funnels those who might identify as MENA into the White category. The exclusion of a MENA option on the Census and other forms that collect race/ethnicity data erases significant cultural, linguistic, and historic nuances and needs of MENA communities. For example, almost 25% of Arab people in the U.S. live in poverty compared to 13% of White Americans. The categorization of MENA individuals as White also hinders our understanding and response to health disparities among MENA communities. For example, the rate of diabetes among White populations is around 7.5%.⁵ In contrast, diabetes prevalence among Arab Americans can range

² Schuster, Luc. “We’re Reporting Census Data All Wrong.” www.bostonindicators.org, www.bostonindicators.org/article-pages/2021/december/census_reporting. Accessed 15 Nov. 2022.

³ NW, 1615 L. St, et al. “Hispanic Racial Identity: Multidimensional Issue for Latinos.” *Pew Research Center’s Social & Demographic Trends Project*, 11 June 2015, www.pewresearch.org/social-trends/2015/06/11/chapter-7-the-many-dimensions-of-hispanic-racial-identity/.

⁴ Mathews, Kelly. “2015 National Content Test: Race and Ethnicity Analysis Report.” *Census.gov*, 8 Oct. 2021, <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/final-analysis/2015nct-race-ethnicity-analysis.html>.

⁵ “Statistics about Diabetes | ADA.” *Diabetes.org*, diabetes.org/about-us/statistics/about-diabetes#:~:text=12.1%25%20of%20non%2DHispanic%20blacks.

from 4.8% to 23%, with rates highest among Somali communities.⁶ MENA individuals do not share the same social and cultural privileges as White Americans, and experience high rates of discrimination. Around 60% of Arab Americans reported workplace discrimination after 9/11, and 40% of Americans admitted to being prejudiced toward Arabs, Muslims, or both.⁷ These important social, cultural, and health differences are obscured when MENA individuals are aggregated into the White category.

There is data and support from MENA communities that this new response option on the race/ethnicity question is acceptable, understandable, and necessary to better represent them on the Census. Recent studies show when MENA individuals are given a MENA category for race/ethnicity, 88% chose that option.⁸ Research conducted by the Census Bureau in 2017 concluded "it is optimal to use a dedicated 'Middle Eastern or North African' response category" on the 2020 Census questionnaires. We support the addition of the MENA category for the 2030 Census.

Requiring the collection of detailed race and ethnicity categories using open-ended write-in fields can help identify the specific needs of minority communities.

Census data plays a major role in helping the federal government understand the specific needs of diverse communities across the country. However, the way that Census data is collected can often obfuscate health and economic inequities and result in poor allocation of resources to meet community needs.⁹ For example, the aggregation of all indigenous communities into one "American Indian or Alaska Native" category without obscures varying poverty rates and needs. As a whole, American Indian or Alaska Native communities experience an overall poverty rate around 23%. When you disaggregate that data, poverty rates vary from 5.9% for the Aleut in Alaska to 36.9% for those who identify as part of the Sioux Native American tribe (living primarily in Nebraska, North Dakota, and South Dakota).¹⁰ Similarly, when looking at poverty rates among Asian Americans, there is an overall poverty rate of about 10%, but the poverty rate is about 28% for Mongolian people compared to 4.5% for Chinese and Japanese people.¹¹

It is critically important that Census data is accurately reflecting the needs of various communities across the country rather than obscuring important differences and disparities. Census data is used

⁶ Abuelezam NN, El-Sayed AM, Galea S. The Health of Arab Americans in the United States: An Updated Comprehensive Literature Review. *Front Public Health*. 2018 Sep 11;6:262. doi: 10.3389/fpubh.2018.00262. PMID: 30255009; PMCID: PMC6141804.

⁷ *Ibid.*

⁸ Maghbouleh, Neda, et al. "Middle Eastern and North African Americans May Not Be Perceived, nor Perceive Themselves, to Be White." *Proceedings of the National Academy of Sciences*, vol. 119, no. 7, 7 Feb. 2022, p. e2117940119, <https://doi.org/10.1073/pnas.2117940119>.

⁹ Farah, Farah, and et.al. *Disaggregating Race/Ethnicity Data Categories: Criticisms, Dangers, and ...* <https://www.healthaffairs.org/doi/10.1377/forefront.20220323.555023>.

¹⁰ Schwabish, Jonathan, and Alice Feng. "Combining Racial Groups in Data Analysis Can Mask Important Differences in Communities." *Urban Institute*, 22 Mar. 2021, www.urban.org/urban-wire/combining-racial-groups-data-analysis-can-mask-important-differences-communities.

¹¹ *Ibid.*

to determine how [more than \\$675 billion](#) in government funding and critical social support programming is distributed each year. If, for example, we only had the aggregated poverty data for Asian Americans, that might lead to less financial support going towards Mongolian communities that need it most. We support the required provision of open-ended write-in response options for the race and ethnicity question so that there will always be a way for respondents to accurately report their demographic information and so the Census is able to account for important cultural and demographic shifts that it would not be able to capture with close-ended options only. This will also help to ensure that the needs of all communities are accurately represented and reduce the use of ambiguous close-ended options like SOR.

Updating the way the Census and other surveys collect race and ethnicity data is necessary in order to understand the varying economic, health, and social disparities experienced by communities of color. We greatly appreciate the opportunity to submit comments on this OMB request for information regarding updating race and ethnicity statistical standards. Should you have any questions about our comments, please feel free to contact Tim Wang, Director of Policy and Advocacy, at timothyw@howardbrown.org.

Sincerely,

David Ernesto Munar
President and CEO