



April 27, 2023

The Honorable Richard L. Revesz
Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
1800 G Street, NW, 9th Floor
Washington, DC 20503

Re: Document Citation: 88 FR 5375 Docket Number USBC-2023-01635

Dear Administrator Revesz:

On behalf of the League of Women Voters of the United States (The League), I write to offer comments on updating OMB's Race and Ethnicity Statistical Standards. The League is deeply committed to building a country that works for all of us, one that understands all the people who make up our communities and forms a fully representative democracy.

The League of Women Voters is a nonpartisan organization founded over a century ago by women's suffragist leaders committed to protecting the right to vote. We are a grassroots organization comprised of more than 500,000 members and supporters across more than 750 local and state Leagues nationwide. LWVUS focuses on advocacy, education, litigation, and organizing to achieve our mission to empower voters and defend democracy.

This comment period is integral to improving data collection, as the ways in which people in the United States self-identify their race and ethnicity have evolved since the last revision of the race and ethnicity standards in 1997. The data collected from the current format of these questions has long been incomplete. The League applauds this work to revise race and ethnicity standards, especially as planning is currently underway for the 2030 Census.

This revision is critical for many agencies, but it is especially important that the Census Bureau can fulfill its mission to produce full, fair, and accurate data on our nation's population using the proposed, improved standards. Revisions to the race and ethnicity standards will build the foundation for modernizing the questions the Census Bureau uses in its questionnaires. The League has worked with the Census Bureau for many decades to support the collection of data that is inclusive of all communities.

As a foundation for their work, the League supports the OMB Working Group's twelve outlined principles to guide their work. The League agrees that it is especially important in this process to prioritize respecting individuals and their identities, avoid defining race and ethnicity biologically or



genetically, consider the data needs of state and local governments in addition to the federal government, and adhere to public law. The undertaking of this work on the part of the OMB and other involved agencies demonstrates a principled commitment to gathering accurate data about the diversity in our country.

The League appreciates the opportunity to weigh in on this work and offers input on the below topics:

Combined Question vs, Current Format with Race and Ethnicity

As the working group assesses feedback about the proposal to create a combined question to replace the current format, the League urges that the priority be placed on easing reporting for individuals, reducing confusion for those completing the question, and allowing individuals to self-identify with one or multiple options.

As the request for comment notes, there have been concerns in the past about which option(s) an individual should select. An improvement to these questions should seek to ease participant selection of identity option(s) by using a list of options that are reflective of the full population, have clear definitions, and are easily able to be answered by participants.

The Census Bureau has [conducted research](#)¹ since at least 2010, indicating that the wording and format of the separate race and ethnicity questions do not align with how many residents of our nation self-identify, resulting in inaccurate or incomplete Census data. OMB revisions to the standards will allow the Census Bureau to update questions to be included in the American Community Survey (ACS) and the 2030 Census.

MENA Reporting Category

The number of respondents identifying with the “some other race” selection has increased over past censuses, with roughly [50 million people](#)² checking “some other race” in the 2020 census. As Americans who identify with the Middle Eastern North African (MENA) community have not been able to indicate this on government documents, we cannot fully understand their experience or ensure equity. It is impossible to diagnose or improve an issue without data to measure its scope.

As an organization that prioritizes equal access for eligible voters to the ballot box, the League finds it concerning that government agencies lack information about large communities of voters over the years. The future collection and tracking of this information will allow for equal treatment of these communities in redistricting, easier access to government services, and more. Thus, we support the recommendation of organizations representing the MENA community to adopt a reporting category that allows the community to appropriately self-identify.

Detailed Race and Ethnicity Categories by Default

Questions about race and ethnicity should allow respondents to select detailed identifiers as often as possible in order to promote consistency of data across agencies. As such, the standards should strongly direct all agencies to use more detailed data for all minimum race and ethnicity categories as much as possible. All agencies should collect detailed data as a default, allowing for exceptions only when an agency determines that detailed data presents issues of data quality or respondent confidentiality.

¹ <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>

² <https://www.census.gov/library/stories/2021/08/improved-race-ethnicity-measures-reveal-united-states-population-much-more-multiracial.html>



Using terminology and race and ethnicity categories that most closely align with the ways that diverse groups of people identify should be a priority in this process. Without collecting consistent data on the detailed subgroups in each major race and ethnicity category as a default, important information, experiences, and data would be missed. Therefore, disaggregated data is necessary to understand the diverse experiences of all of the American communities surveyed by US government agencies.

Updated Terminology

The League agrees that “[t]he terminology used in SPD 15 should seek to ensure that all people are able to identify themselves within one or more of the minimum categories, that the minimum and detailed categories reflect meaningful and easy-to-understand distinctions, and that the language used is respectful of how people refer to themselves.” The specific proposed terminology updates are necessary to better reflect how individuals identify and reduce confusion for respondents.

We strongly agree with the proposal to:

- remove the word “Negro” from the Black or African American definition;
- remove the term “Far East” from the Asian definition, and replace it with “East Asian;”
- remove the word “Other” from “Native Hawaiian and Other Pacific Islander;”
- remove the phrase “who maintain tribal affiliation or community attachment” in the American Indian or Alaska Native definition; and
- discontinue use of the terms “majority” and “minority.”

Regular reassessment of the terms we use is necessary to continue to collect relevant data and reflect the ways we see ourselves. This is an activity that the League has also incorporated into our work, regularly evaluating the language we use and ensuring that it is accurate and respectful of the communities with whom we work.

As we seek to build a country that works for all of us, understanding all of the people who make up our communities is integral to forming a representative democracy. The League hopes to continue to be a resource to the Management and Budget Office and appreciates the opportunity to respond to the Federal Register notice on updating OMB's Race and Ethnicity Statistical Standards. Please do not hesitate to contact our staff via Jessica Jones Capparell, Director, Government Affairs at JJonescapparell@lwv.org, or Kristen Kern, Federal Policy and Advocacy Manager at kkern@lwv.org.

Sincerely,

A handwritten signature in black ink, which reads "Virginia Kase Solomón". The signature is written in a cursive, flowing style.

Virginia Kase Solomón
CEO