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May 2, 2023

The Honorable Shalanda Young
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Young:

I applaud the Office of Management and Budget (OMB) for its continued commitment to revising the federal standards for race and ethnicity data. I write to voice support for this process and urge OMB to adopt recommended revisions expeditiously after the public comment period, including the recommended category for people of Middle Eastern or North African (MENA) descent.

On January 26, 2023, OMB announced initial recommended revisions to its Standards for Maintaining, Collecting, and Presenting Federal Data on Race & Ethnicity, proposed by an expert Interagency Technical Working Group. The proposals included adding a response category for MENA populations and collecting race and ethnicity together in a single question, as well as other recommended improvements. OMB has collected public comments on these proposals and announced its intention to complete the revisions by summer 2024. I commend OMB and the Working Group for their robust review process to revise these standards, which has included a thorough review of existing research by the Working Group's career staff experts, public listening sessions and town halls, and the public comment period.¹

Given that OMB sets the government-wide standards for collecting race and ethnicity data, it is essential that these standards represent the nation's diversity and allow agencies to best serve every community. The current standards, last updated in 1997, do not ensure fully accurate data on all communities.²

¹ Office of Management and Budget, *Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards*, 88 Fed. Reg. 5375 (Jan. 27, 2023) (<https://www.federalregister.gov/documents/2023/01/27/2023-01635/initial-proposals-for-updating-ombs-race-and-ethnicity-statistical-standards>). See also Office of Management and Budget, "Initial Proposals for Revising the Federal Race and Ethnicity Standards" (Jan. 26, 2023) (<https://www.whitehouse.gov/omb/briefing-room/2023/01/26/initial-proposals-for-revising-the-federal-race-and-ethnicity-standards>).

² Office of Management and Budget, *Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity*, 62 Fed. Reg. 58782 (Oct. 30, 1997) (<https://www.federalregister.gov/documents/1997/10/30/97-28653/revisions-to-the-standards-for-the-classification-of-federal-data-on-race-and-ethnicity>).

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In particular, the standards should be updated to include a separate reporting category for people of MENA descent. Research has shown that the lack of a MENA category in the current standards limits the data available on unique challenges faced by the Arab American population, such as healthcare needs and other disparities.³ The U.S. Census Bureau has conducted extensive research showing that a MENA category would result in more accurate data for this population.⁴ More precise and consistent data are necessary to fully understand and address inequities in housing, economic opportunities, and other civil rights. Adding a MENA category would provide more accurate data and allow the federal government to better serve this population. I commend the Working Group for including the addition of a MENA category in its initial proposals. I urge OMB, after full consideration of public comments, to include a MENA category in its final revisions to the standards.

Accurately reflecting our nation's diversity will benefit all communities, ensuring government services are effective and accessible. I also encourage OMB to continue considering other Working Group recommendations and public comments that would improve data collection and accuracy, including collecting race and ethnicity information using a combined question, and requiring the collection of detailed race and ethnicity categories by default.⁵

I appreciate OMB's commitment to a "full, transparent revision process," guided by public input, with the goal of "ensuring that the standards better reflect the diversity of the American people."⁶ Thank you for considering public comments and continuing public engagement as the Working Group develops its final recommendations, and OMB completes revisions to the standards. I urge you to continue working to finalize these recommendations in a timely manner and adopt important revisions including the MENA category.

Thank you for your consideration.

Sincerely,



Gary C. Peters
Chairman

³ Letter to OMB from Asraa Alhawli et. al (Feb. 3, 2021) (available at <https://www.accesscommunity.org/health-wellness/can>).

⁴ United States Census Bureau, *2015 National Content Test Race and Ethnicity Analysis Report* (Feb. 28, 2017) (<https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>).

⁵ Office of Management and Budget, *Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards*, 88 Fed. Reg. 5375 (Jan. 27, 2023); See also Public Comments to 88 Fed. Reg. 5375 (<https://www.regulations.gov/document/OMB-2023-0001-0001/comment>).

⁶ Office of Management and Budget, "Initial Proposals for Revising the Federal Race and Ethnicity Standards" (Jan. 26, 2023) (<https://www.whitehouse.gov/omb/briefing-room/2023/01/26/initial-proposals-for-revising-the-federal-race-and-ethnicity-standards>).

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cc: The Honorable Richard L. Revesz
Administrator
Office of Information and Regulatory Affairs

Dr. Karin Orvis
Chief Statistician of the United States