



April 27, 2023

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

**Re: Docket Number 2023-0001, Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards (88 FR 5375)**

Dear Administrator Revesz,

On behalf of the Arab American Institute (AAI), I write in reference to the Office of Management and Budget's (OMB) request for comments on the initial proposals from the Federal Interagency Technical Working Group on Race and Ethnicity Standards ("working group") for revising OMB's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity ("standards").<sup>1</sup>

The Arab American Institute is a national civil rights advocacy organization that has been committed to supporting the social and political representation of approximately 3.7 million Arab Americans in local, state, and national governance for decades.<sup>2</sup> Our organization represents the policy and community interests of Arab Americans across the United States and was created to nurture and encourage the direct participation of Arab Americans in political and civic life. In particular, AAI serves as a central resource for government officials, the media, political leaders, and community groups on a variety of public policy issues that concern Arab Americans.

Accurate data about the Arab American population has been a central part of AAI's mission, beginning in the late 1980s when AAI first worked with the Census Bureau to ensure Arab Americans were accurately counted in the 1990 census. In the 1990s, AAI organized a "Statement of Support for a Middle Eastern Classification" for persons from the MENA region in the lead up to OMB's 1997 revision of the standards.<sup>3</sup> Later, AAI helped launch the Ancestry Working Group to support the Census Bureau's efforts to decrease systemic undercounting of Arab Americans and created the MENA Advocacy Network in 2011 after the elimination of the long-form questionnaire

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<sup>1</sup> OMB Control Number: OMB-2023-0001, published in 88 FR 5375 on January 27, 2023

<sup>2</sup> Though the current Census Bureau estimate of the Arab American population is 2.2 million, AAI recognizes the existing undercount and derives our demographic information from Census Bureau surveys, including the American Community Survey, projections based on other surveys, and other data sources, including the Office of Immigration Statistics.

<sup>3</sup> Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity, 62 Fed. Reg. 58782 (Oct. 30, 1997), <https://www.govinfo.gov/content/pkg/FR-1997-10-30/pdf/97-28653.pdf>.

from the decennial census. Committed to data equity, AAI has also served as a Census Information Center (“CIC”) partner since 2001. As such, AAI offers updated demographics on the Arab American community, custom research requests, and access to Census Bureau data tools and trainings.

It has been of mutual interest for AAI and the Census Bureau to find the best way to ensure a fair and accurate count of Arab Americans as the Arab American community has long suffered from a well-established census undercount. To that end, for decades we have actively collaborated with policy makers, the Census Bureau, OMB, and coalition partners to lead the effort to secure an accurate count of Arab Americans with the inclusion of a “Middle Eastern or North African (MENA)” minimum reporting ethnic category on the decennial census and other federal forms that collect and publish race and ethnicity data.<sup>4</sup>

We have played a central role in organizing around the MENA category in recognition that an undercount of those with MENA origins has harmed those encompassed by the category, including Arab Americans. Today, more than ever, AAI remains committed to working with the Census Bureau to ensure an accurate census for all.

The current standards<sup>5</sup> leave Arab Americans and other communities within MENA invisible in federal data.<sup>6</sup> Without changes to Directive 15, MENA communities, including Arab Americans, will face the untenable burden of having to continue fighting for accurate representation,<sup>7</sup> civil rights protections,<sup>8</sup> and much-needed health and community resources<sup>9</sup> without accurate data backing their requests — rendering them invisible in the data for at least another decade.<sup>10</sup>

With this background in mind, the Arab American Institute offers the following comments and recommendations in response to Federal Register Notice 88 FR 5375:

***I. The addition of “Middle Eastern or North African” (MENA) as a new minimum reporting ethnic category.***

**The Arab American Institute emphatically supports updating Directive 15 to include the addition of “Middle Eastern or North African (MENA)” as a new minimum reporting ethnic category.** The MENA category should be collected as an *ethnicity* not a race, similar to the tabulation of the existing Hispanic/Latino ethnicity category. The new MENA category should be

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<sup>4</sup> Brief for the Arab American Institute as Amicus Curiae, Dept. of Comm. v. New York, 139 S. Ct. 2551 (2019).

<sup>5</sup> *Id.*

<sup>6</sup> *Arab American Demographics Factsheet*, ARAB AM. INST. (2018), [https://censuscounts.org/wp-content/uploads/2019/03/National\\_Demographics\\_SubAncestries-2018.pdf](https://censuscounts.org/wp-content/uploads/2019/03/National_Demographics_SubAncestries-2018.pdf)

<sup>7</sup> *Ensuring a Fair and Accurate Count in the 2020 Census*, ARAB AM. INST., [https://static1.squarespace.com/static/5c96c17de5f7d145081a1f94/t/5d5f0a721aabda00017d6163/1566509682639/2019LD\\_Census\\_Issue\\_Brief.pdf](https://static1.squarespace.com/static/5c96c17de5f7d145081a1f94/t/5d5f0a721aabda00017d6163/1566509682639/2019LD_Census_Issue_Brief.pdf) (last visited Apr. 23, 2023).

<sup>8</sup> *Id.*

<sup>9</sup> Awad, Germine, Nadia Abuelezam, Kristine J. Ajrouch & Matthew Jaber Stiffler, *Lack of Arab or Middle Eastern and North African Health Data Undermines Assessment of Health Disparities*, 112,2 AM. PUB. HEALTH ASS’N 209-212 (2021).

<sup>10</sup> Yalla Count MENA In!, ARAB AM. INST. <https://yallacountmenain.org> (last visited Apr. 27, 2023) (Public campaign mobilizing and educating Arab Americans on the MENA category).

required as a minimum reporting category in all instances in which federal agencies collect and report data on race and ethnicity.

**The MENA category must be collected and tabulated as an ethnicity, not a race.** Individuals with MENA origins and ancestry are comprised of diverse racial identities, and the standards must reflect the racial diversity of the category in order to provide accurate data on these communities. Although the current standards mandate the majority of the groups encompassed by the MENA category be tabulated as “White,” this definition does not accurately reflect the reality of all respondents. While some respondents with MENA origins may identify as White, others report identifying with a different racial category, as seen in the 2015 NCT results.<sup>11</sup> By collecting responses to the MENA category as an ethnicity, and allowing respondents to self-select their racial identity, the standards will reflect an accurate accounting of individuals with MENA origin.

**We support the *most comprehensive geographic* definition of MENA origin and ancestry to include populations with origins in member nations of the League of Arab States as well as Turkey, Iran, Israel, and transnational ethnic communities from this region.** “Middle Eastern or North African” or “MENA” is a broadly recognized term, used by civil society organizations,<sup>12</sup> government programs,<sup>13</sup> community organizations,<sup>14</sup> and academia alike.<sup>15</sup> No other term is agreeable to the diverse members represented in the MENA communities. While Arab Americans represent the largest segment of MENA populations, many ethnic, transnational, and subnational groups do not identify as Arab, but rather Middle Eastern. This applies to both U.S.-born individuals and immigrants. Further, it is important to describe the term MENA as multiple communities, rather than one community. As noted, the overwhelming majority of the MENA population in the U.S. is comprised of people with Arab origin who share a common cultural heritage and language. MENA is more diverse and includes non-Arab groups. Therefore, *MENA communities* is more accurate than MENA community to reflect the diversity in origins, languages, and cultures of MENA populations.

Adopting the following definition of MENA will provide the most comprehensive data on the region’s diverse communities, capturing the multiple racial, national, and subnational identities represented:

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<sup>11</sup> Kelly Mathews, Jessica Phelan, Nicholas A. Jones, Sarah Konya, Rachel Marks, Beverly M. Pratt, Julia Coombs & Michael Bentley, *2015 National Content Test Race and Ethnicity Analysis Report*, U.S. CENSUS BUREAU, (Feb. 28, 2017), <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>.

<sup>12</sup> *Middle East and North Africa*, UNICEF, <https://www.unicef.org/mena/> (last visited April 12, 2023).

<sup>13</sup> *Middle East*, USAID, <https://www.usaid.gov/where-we-work/middle-east> (last visited April 24, 2023) (referring to the “Middle East and North Africa” throughout).

<sup>14</sup> Angela Buchanan, Rachel Marks & Magdaliz Álvarez Figueroa, *2015 Forum on Ethnic Groups from the Middle East and North Africa*, U.S. CENSUS BUREAU (Sept. 7, 2016), <https://www.census.gov/content/dam/Census/library/working-papers/2015/demo/MENA-Forum-Summary-and-Appendices.pdf>

<sup>15</sup> E.g., G. Awad, H. Hashem, H. Nguyen, *Identity and Ethnic/Racial Self-Labeling Among Americans of Arab or Middle Eastern and North African Descent*, 21 IDENTITY (2021), [https://www.icos.umich.edu/sites/default/files/lecturereadinglists/Awad%20et%20al.%2C%202021\\_Identity%20and%20Ethnic%20Racial%20Self%20Labeling%20among%20Americans%20of%20Arab%20or%20Middle%20Eastern%20and%20North%20African%20Descent.pdf](https://www.icos.umich.edu/sites/default/files/lecturereadinglists/Awad%20et%20al.%2C%202021_Identity%20and%20Ethnic%20Racial%20Self%20Labeling%20among%20Americans%20of%20Arab%20or%20Middle%20Eastern%20and%20North%20African%20Descent.pdf).

- A. **League of Arab States:** Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen.
- B. **Non-Arab MENA States:** Iran, Israel, and Turkey.
- C. **Transnational communities:** Assyrians, Chaldeans, Kurds, Amazigh/Berber, and Armenians with roots in the MENA region.

**Keeping in mind the diverse racial makeup of those with MENA origins, the comprehensive definition of MENA needed to capture these communities, and the goal of accurate data, AAI recommends an alternative to the proposed nationality and ethnic subgroups used for the checkboxes and examples within the MENA category.** The working group’s initial proposed checkboxes and examples do not adequately represent the diverse makeup of the MENA category. Further, the example question provided does not follow the traditional approach adopted by the Census Bureau for choosing the checkboxes and examples, and no alternative logic is given.

While the Census Bureau has historically determined examples by population size, we believe a nuanced approach that includes that metric, as well as regional diversity and geographic considerations, will elicit better data. For instance, as they exist now, the proposed examples do not recognize the racial diversity of individuals with MENA origins despite a strong majority of experts questioned by the Census Bureau indicating that Middle Eastern or North African responses should *not* be classified only as racially White.<sup>16</sup> At the same time, when asked which subgroups should be included in the definition, 77.4% specified Sudanese and 64.5% specified Somali to be included as examples, indicating a solid consensus among expert respondents that these Arabic-speaking sub-Saharan ancestry groups should be included within the MENA category. On the 2015 National Content Test, at least 8% of Sudanese identified as part of the MENA category<sup>17</sup> despite the proposed MENA checkbox containing no reference to Black Arabs and the Black or African American checkbox listing them as examples.<sup>18</sup> The example subgroups adopted in the revisions should cover the broad geographic, racial, and transnational makeup of MENA origins and ancestry.<sup>19</sup> For these reasons, we strongly support revising the examples in the sample to better reflect the demographics of the diverse MENA region and help respondents recognize their inclusion in this category. We recommend the following representation for the six checkboxes to be included within the MENA category:

1. **The Levant:** We recommend listing **Lebanese** as a checkbox due to that population’s large size.
2. **North Africa:** We recommend listing **Egyptian** as a checkbox due to that population’s large size.

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<sup>16</sup> Buchanan, *supra* note 9, at 16 (69.7% experts polled indicated that MENA responses should not be classified as White).

<sup>17</sup> Mathews, *supra* note 6 at 64.

<sup>18</sup> *Id.* at 183-190 (showing “Somali” listed as an example subgroup under Black or African American, and no sub-Saharan Arabic-speaking countries listed as example subgroups under MENA).

<sup>19</sup> Buchanan, *supra* note 9, at 30-32 (“Around 77 percent of participants thought both Armenian and Sudanese should be included, while 74 percent thought Mauritanian should be included. Between 60 and 70 percent of participants thought that Western Saharan, Somali, and Djiboutian should be included”).

3. **Arabic-Speaking States in Sub-Saharan Africa:** Current examples ignore Afro-Arabs (specifically Comoros, Djibouti, Sudan, Somalia, and Mauritania). We recommend listing **Sudanese or Somali** as a checkbox.
4. **Arabian Peninsula States:** We recommend listing **Yemeni** as a checkbox due to that population's large size.
5. **Non-Arab MENA:** We recommend keeping **Iranian** as a checkbox due to that population's large size.
6. **Transnational Communities:** Armenians, Assyrians/Chaldeans, Kurds, and Amazigh/Berber are significant transnational communities from the region but are not used as an example. These should be considered in the context of the communities' experiences and representation in America. Therefore, we recommend listing **Armenian** or **Assyrian/Chaldean** as a checkbox due to those populations' large size.

Additionally, the three examples to be included within the MENA category can be determined by considering other factors that can best signal to respondents their inclusion within the MENA category.

As a new ethnic category, respondents that fall within the MENA category may also fall into different racial categories. The inclusion of a subgroup in the detailed checkboxes or examples for the MENA ethnicity category should not preclude their presence as an example under a racial category (i.e., Somalis or Sudanese could be listed under *both* a Black racial category and a MENA ethnic category).

These recommendations for detailed MENA data collection will aid in efforts to accurately collect data about MENA populations, including Arab Americans.

## **II. *The use of a combined question format on race and ethnicity.***

**The Arab American Institute strongly recommends the adoption of the combined question format on race and ethnicity.** The question should clearly allow respondents to select one or more race and/or ethnicity, include multiple example subgroups for each category, and maintain a distinction between race and ethnicity.

**The addition of a MENA ethnicity category alongside a combined question format with detailed checkboxes would give individuals of MENA origin the opportunity to accurately self-identify for the first time ever.** When offered the option in a combined question, 79 percent of respondents of MENA origin selected the MENA category.<sup>20</sup> A combined question is the optimal design for the inclusion of a MENA ethnicity category because, like the Hispanic/Latino category, MENA communities are not a racial monolith. While existing standards require the tabulation of most MENA ancestries as White, this does not accurately reflect the entire population.<sup>21</sup> Of course, accuracy of data on a single community is only as valuable as the accuracy of the dataset as a whole.

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<sup>20</sup> Mathews, *supra* note 6 at 59.

<sup>21</sup> *Supra* note 11-13.



Testing by the Census Bureau has shown that the combined question in combination with a MENA category elicits better data across racial and ethnic categories.<sup>22</sup> When the MENA category was present, selection of “Some Other Race” (SOR) by respondents of MENA origin dropped from 11.5 percent to 3.3 percent.<sup>23</sup> A reduction in the SOR response category allows for greater accuracy in addressing disparities and increasing agency protections required by law. A lower SOR response rate elicited by the presence of the MENA checkbox means less race responses must be imputed from outside sources, raising the accuracy of the data overall.

**The diverse racial makeup of both the MENA and Hispanic/Latino ethnicity categories demands that respondents have the option to select one or more race *and/or* ethnicity.** This format would finally allow MENA individuals to identify as they see themselves, whether a single race, more than one race or ethnicity, or an ethnicity alone. For example, as MENA *and* White (some Lebanese and Iranian individuals), MENA *and* Black (some Egyptian and Sudanese individuals), or as MENA only. To that end, AAI strongly recommends the continued research and testing of question stems designed to instruct respondents on the available response combinations. This should include testing of a question stem asking respondents to select their “race **and/or** ethnicity” and “mark **all** that apply.”

**To ensure that a new combined question would allow individuals from all communities to accurately self-identify, AAI recommends each category on the combined question include checkboxes for subgroups and examples for write-ins.** The collection of more, and more accurate, detailed data on all federal forms where race and ethnicity data are collected contributes to better data for hard-to-count and marginalized communities. Testing by the Census Bureau has found that inclusion of detailed checkboxes elicits better detailed data across categories.<sup>24</sup> Detailed subgroups should help respondents select all aspects of their racial and ethnic identity. To that end, examples should include subgroups beyond the largest populations, instead signaling to respondents the full breadth of each category as suggested in our response to the MENA category subgroups above. Of course, the OMB and the Census Bureau must continue to consult with stakeholder communities to determine the best configuration of subgroups.

### ***III. Mandatory collection of detailed race and ethnicity by default***

**The Arab American Institute recommends that the OMB require, rather than encourage, the collection and reporting by agencies of detailed data on all minimum reporting categories.** Agency collection of disaggregated data should be mandatory unless an agency demonstrates the collection would violate respondent privacy or compromise the integrity of the data. The burden on agencies for the collection of disaggregated data is minimized by the introduction of new technology and the migration of forms to online platforms.

**The revised standards must clearly and definitively state that these reporting categories, including the detailed subgroups, are the *minimum* reporting categories required.** Agencies must understand that they are not required to limit collection and reporting to the categories

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<sup>22</sup> Mathews, *supra* note 6 at 59 (“The reporting of MENA responses in the SOR category is significantly reduced from 11.5 percent when no MENA category is included to 3.3 percent with the inclusion of a distinct MENA category.”).

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at 52.

included in Directive 15. Instead, the reporting categories are the floor, not the ceiling, for data collection. When the minimum nature of the requirement is not clear, communities can be directly harmed. For example, reporting of anti-Arab hate crime was excluded from the FBI's annual reporting until 2015, despite initial plans to include an anti-Arab reporting category.<sup>25</sup> Research has shown that the reporting category was removed from the FBI's bias crime reporting "upon recommendation from the OMB, in accordance with Policy Directive No. 15."<sup>26</sup> While the category was eventually added, there was no federal reporting on anti-Arab hate crime from 1997-2015, making it harder for advocates and policymakers to push for increased training, response, and community outreach to curb anti-Arab violence. Without a clear statement and effective communication that the reporting standards are a minimum requirement, communities may continue to be harmed by the lack of data collected by federal agencies or programs.

**The minimum requirement must include collection of detailed subgroups.** Disaggregated data across federal agencies gives context to socio-economic disparities among Americans and allows advocates and policymakers to address these concerns. The required collection of detailed information has the potential to elicit better data – as some respondents are more likely to see themselves in a subgroup than overall racial or ethnic group. Although there may be some instances in which an agency cannot publish detailed data due to the small size of responses, the continued collection of the data will ensure future aggregation is possible. Additionally, more detailed information allows for greater overall accuracy. Requiring disaggregated data curbs the danger of an undercount for ethnic and racial communities and allows policymakers and advocates to check harmful narratives on these communities.<sup>27</sup>

Access to disaggregated data is especially important for communities that fall into the MENA category. As noted above, the MENA category encompasses a broad range of identities who have very different experiences in American society. Among Arab Americans, disparities between subgroups can be seen in socioeconomic status, educational attainment, and even health concerns – meaning aggregated data will not allow federal programs to adequately address the needs of these communities. For instance, most Arab American families are just as likely to receive federal assistance as the total U.S. population, ranging between 4% and 6 percent. However, a much higher number of Iraqi and Somali immigrants receive Supplemental Security Income (SSI) and assistance benefits.<sup>28</sup> Without disaggregated data, resources to assist these subgroups may be overlooked in the face of the much lower percentage of participants in the MENA category overall.

Similarly, subgroups within the MENA category continue to suffer from a lack of health research and targeted healthcare for their communities. For example, experts have noted the scant research

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<sup>25</sup> *Underreported, Under Threat: Hate Crime in the United States and the Targeting of Arab Americans*, ARAB AM. INST. 77-80 (2018), <https://www.aaiusa.org/library/under-reported-under-threat>.

<sup>26</sup> *Id.* at 79.

<sup>27</sup> *Quality of the Decennial Census for Asian American and Native Hawaiian and Pacific Islander Communities*, Asian Am. Advancing Just. (2023), [https://www.advancingjustice-aajc.org/sites/default/files/2023-04/AAJC\\_CensusQualityFinalReport.pdf](https://www.advancingjustice-aajc.org/sites/default/files/2023-04/AAJC_CensusQualityFinalReport.pdf).

<sup>28</sup> Arab America Today, ARAB AM. INST. (forthcoming 2023) (manuscript at 44) (on file with author) (forthcoming) (citing ACS 2011-2015, ACS 2018).

on both the Arab American<sup>29</sup> and Iranian American<sup>30</sup> communities. Unfortunately, this has real-world consequences. In the midst of the COVID-19 crisis, Arab American communities lacked reliable information that was available in Arabic or considered their particular risk factors.<sup>31</sup> Arab Americans have high rates of high blood pressure, higher BMIs, and higher rates of diabetes, making them high risk for the virus.<sup>32</sup> **Disaggregated data will help make health disparities more obvious, and allow federal programs to target health concerns of these communities more effectively.**

While agencies may raise concern over the perceived burden of expanding their reporting categories, the migration of federal surveys to digital response platforms minimizes the burden of collection. These platforms, such as the one used for the 2020 Census, allow for flexibility in terms of cost and form size, while ensuring consistency across data collection efforts. Of course, it will still be necessary to continue traditional forms of collection, but the use of digital platforms for agency collection can reduce these costs and promote more detailed collection of data. The OMB should work with federal agencies to ensure high quality data is collected across platforms and methods.

#### ***IV. Guidance is necessary to implement SPD 15 revisions on Federal information collections.***

**Revisions to the collection standards must go hand-in-hand with guidance from the OMB on implementing consistent protocols for the analysis of race and ethnicity data.**

Policymakers, researchers, and stakeholders must receive guidance from the OMB on comparing new data between categories, as well as comparing new data to previous collections. As race and ethnicity data is used for the enforcement of civil rights laws, redistricting, and mending disparities among groups, it is crucial that data use be sound and consistent. Detailed guidance on the use of the data from the OMB is necessary to ensure consistency of use and analysis across stakeholders and levels of expertise.

**Guidance on bridging data collected under the new standards with previous collections is necessary to ensure analysis on data across time remains consistent.** In addressing bridging collected race and ethnicity data, the OMB must implement clear guidance to users on how to compare data across time despite changes to the question format. This is especially necessary with the inclusion of a new MENA ethnicity category. The guidance must address how to compare data collected under a new MENA category with that collected under previous questions on ancestry from both the decennial census and the American Community Survey. This guidance will ensure

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<sup>29</sup> *Supra* note 5.

<sup>30</sup> See, e.g., Amini, B., Raheel, O., Exum, A. & Fazzino, T. L., *Mental Health of Iranian Immigrants and Their Descendants: A Review*, 52(2) PRO. PSYCH.: RSCH. AND PRAC. 192-204 (2022), available at <https://psycnet.apa.org/doiLanding?doi=10.1037%2Fpro0000434>.

<sup>31</sup> Bakkar, Hadia, *Trying To Assess COVID's Impact On Arab-American Communities Is Complicated*, NPR (April 11, 2021, 7:00 AM) <https://www.npr.org/2021/04/11/985128948/trying-to-assess-covids-impact-on-arab-american-communities-is-complicated> (“Arab communities in the U.S. have significant COVID high-risk factors, according to Fehmi. But it's difficult to understand how much Arab Americans and other people with roots in the Middle East or North Africa (MENA) have been impacted by the COVID-19 pandemic.”); see also Sharif, M. Z., Maghbouleh, N. & Baback Boozary, A.S., *COVID-19 Disparities Among Arab, Middle Eastern, and West Asian Populations in Toronto: Implications for Improving Health Equity Among Middle Eastern and North African Communities in the United States*, Health Promotion Prac. (2023), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9834619/>

<sup>32</sup> Bakkar, *supra* note 24.



that researchers, policymakers, and stakeholders will be able to confidently address the needs of MENA communities that have long been invisible in the data.

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

AAI strongly recommends the following actions be taken to ensure the successful implementation of the MENA category as part of a combined question format.

**AAI calls for the addition of at least one subject matter expert on MENA communities to Census Bureau staff.** For the last decade, during which the majority of significant progress has been made on the MENA category, the Census Bureau has not employed a subject matter expert on the communities encompassed by the MENA category. The availability of a subject matter expert is necessary for the successful addition of a new category and will ease the burden of creating guidance on how to bridge data from previous surveys with those that include the new MENA ethnicity category. The hiring of a subject matter expert should not be done to the detriment of the Census Bureau's continued consultation with cultural experts and advocacy groups who should continue to weigh in on testing, increasing awareness of the category, and address challenges in data collection.

**AAI recommends that the Census Bureau partner with advocacy groups and designate additional resources to create public education campaigns on the MENA category.** With the addition of the new category, resources must be made available to target hard-to-reach and immigrant communities to address challenges in responsiveness to the new category. This includes language options for multiple MENA communities, as well as culturally competent messaging. Stakeholder organizations as well as community experts should be consulted to ensure messaging is effective. A robust public education campaign is necessary to ensure the success of the new ethnicity category.

In conclusion, we remain grateful for the ongoing efforts of the Office of Management and Budget and the working group in revising the outdated race and ethnicity standards. We believe that the above changes, particularly the addition of a "Middle Eastern or North African" (MENA) minimum reporting ethnic category and the use of the combined question format, will produce more accurate, granular data. Improved data collection under these revised standards can contribute to the betterment of the lives of all Americans. Subsequently, the Census Bureau must code and tabulate the race and ethnicity data to best meet the needs of policymakers and communities alike, while also honoring the standards' central role in the enforcement of our nation's civil rights laws.

We look forward to continuing our partnership throughout the process, as well as during the 2030 Census. We are confident that our joint efforts will result in a better count of all communities. For questions regarding this submission, please contact AAI Policy Counsel Margaret Lowry at [mlowry@aaiusa.org](mailto:mlowry@aaiusa.org).

Sincerely,



Maya Berry  
Executive Director