



April 27, 2023

Shalanda Young
Director
Office of Management and Budget
1650 17th St. N.W.
Washington, D.C. 20500

Bob Sivinski
Chair, Interagency Technical Working Group on
Race and Ethnicity Standards
1650 17th Street N.W.
Washington, D.C. 20500

Re: Comments in Response to FR Document 2023-01635, Initial Proposals for updating Race and Ethnicity Statistical Standards

Dear Director Young and Chair Sivinski,

On behalf of Asian American, Native Hawaiian, and Pacific Islander communities, National Council of Asian Pacific Americans and the organizations signing below are writing to respond to the Federal Register Notice published January 27, 2023, requesting comments on the initial proposals from the Federal Interagency Technical Working Group on Race and Ethnicity Standards to revise OMB's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15).

National Council of Asian Pacific Americans (NCAPA) is a coalition of 38 national Asian American and Native Hawaiian and Pacific Islander organizations. Our member organizations work in East Asian, South Asian, Southeast Asian, Native Hawaiian and Pacific Islander American communities, and our collective networks of member organizations and affiliates span all 50 states and 3 territories. Our member organizations represent more than 30 ethnic groups and work in over 60 languages¹.

¹ National Council of Asian Pacific Americans. 2020. "NCAPA Policy Platform." www.ncapaonline.org. https://www.ncapaonline.org/wp-content/uploads/2020/05/NCAPA_PolicyPlatform_2020.pdf.

Asian American and Native Hawaiian and Pacific Islander communities make up a sizeable proportion of the population and encompass tremendous diversity

There are 24.5 million Asian Americans^{2a} and 1.6 million Native Hawaiian and Pacific Islanders^{3a}, alone or in combination with other races and ethnicities, living in the US, together making up 7.8% of the American population⁴.

As noted by the Census Bureau⁵, a defining attribute of Asian Americans is the tremendous diversity of the populations counted in this category, comprising more than 30 countries of origin, 50 ethnic groups, and speaking over 100 languages from Southeast Asia, South Asia, and East Asia, and diasporas^{6a}. Asian Americans are also the fastest growing major racial and ethnic group of the last two decades, with eight national origin groups doubling in population (Bangladeshi, Indian, Indonesian, Malaysian, Mongolian, Pakistani, Sri Lankan, Thai), and three growing ten times or more (Bhutanese, Burmese, and Nepalese) in that period; this growth is expected to continue, with Asian Americans projected to become the largest immigrant group in the US in three decades, by 2065.^{7a}

Similarly, NHPI groups comprise at least 20 communities in the US⁸. While a majority of NHPI are Native Hawaiian, more than half of all NHPI identify as multiracial. NHPI are also one of the fastest growing racial groups, growing 40% from 2000-2010, doubling or more in population in Arkansas (151%), Nevada (102%), and Alaska (102%) in that same period, and growing by 87% in Arizona and Alabama. Broad categories like 'AANHPI' and 'API' that roll together NHPI groups with AAs erase significant differences in identity, socioeconomic outcomes, history, and immigration patterns both between NHPI and AA and among NHPI.

However, the immense differences not only in history and culture but also social and economic outcomes among both Asian American and Native Hawaiian and Pacific Islander communities are masked by the now-woefully inadequate minimum race and ethnicity categories laid out more than 26 years ago in SPD 15 in 1997.

² U.S. Census Bureau. n.d. "Explore Census Data."
<https://data.census.gov/table?q=asian+groups&tid=ACSDT1Y2021.B02018>.

³ ———. n.d. "Explore Census Data."
<https://data.census.gov/table?q=Native+Hawaiian+and+Pacific+Islander&tid=ACSDT1Y2021.B02019>.

⁴ ———. n.d. "Explore Census Data."
<https://data.census.gov/table?q=population&g=0100000US&tid=DECENNIALPL2020.P1>.

⁵ U.S. Census Bureau. 2022. "20.6 Million People in the U.S. Identify as Asian, Native Hawaiian or Pacific Islander." Census.Gov. May 25, 2022. <https://www.census.gov/library/stories/2022/05/aanhpi-population-diverse-geographically-dispersed.html>.

⁶ Budiman, Abby, and Neil G. Ruiz. 2021. "Key Facts about Asian Americans, a Diverse and Growing Population." Pew Research Center, April 29, 2021. <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans>.

⁷ Budiman, Abby, and Neil G. Ruiz. 2021. "Key Facts about Asian Origin Groups in the U.S." Pew Research Center, April 29, 2021. <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-origin-groups-in-the-u-s>.

⁸ Empowering Pacific Islander Communities. 2014. "Native Hawaiians and Pacific Islanders in the United States: A Community of Contrasts." www.empoweredpi.org. <https://www.empoweredpi.org/s/NHPI-Demographic-Profile-National.pdf>.

Significant and consistent disparities among AA and NHPI communities are masked by aggregating data, with the lack of granular data an insurmountable barrier to equity

With diverse histories of colonization, imperialism, and migration, including the various migration waves of the last 25 years, AA and NHPI groups today have starkly wide-ranging differences in almost every facet of social and economic life – such as income, poverty, unemployment, housing, education, English language proficiency, immigration, and health – which cannot be captured by the current minimum categories of “Asian” and “Native Hawaiian and Other Pacific Islander.”

Health

The global COVID-19 pandemic has exposed disparities and unaddressed systematic inequities throughout the country and within our communities, with communities of color frequently bearing the brunt of the virus’s health toll. For AA and NHPI communities, COVID-19 is yet another stark reminder that data disaggregation can be a matter of life or death. Aggregate health data does not paint an accurate or complete picture of COVID-19 impacts on AA and NHPI communities. The Centers for Disease Control (CDC), has reported that as of June 17, 2021, Asian Americans had 0.7 times as many COVID-19 cases as white Americans and were on par with white Americans in terms of hospitalization and death rates.⁹ However, the CDC’s public-facing information does not disaggregate Asian American data and does not include data on Native Hawaiians and Pacific Islanders. The COVID-19-Associated Hospitalization Surveillance Network, from where the CDC draws its data on hospitalization rates, furthermore, *aggregates* AA and NHPI data into a single category.¹⁰

The passage of the Affordable Care Act enabled noticeable gains among Asian Americans in terms of obtaining health insurance. However, while aggregated data suggest that Asian Americans have the lowest uninsured rate of any racial or ethnic group, these numbers do not tell the full picture without disaggregated data.¹¹ In 2015, of the top 10 highest uninsured groups in the US, 5 are Asian Americans (Pakistanis at 20.9%, Koreans at 20.5%, Cambodians at 18.9%, Vietnamese at 18.5%, Bangladeshis at 18.2%) and 2 are Native Hawaiian and Pacific Islanders (Micronesians at 18.3% and Samoans at 16.7%).¹² Among all AA and NHPI, NHPI had the highest uninsurance rate at 12.3% in 2019¹³.

⁹ “Cases, Data, and Surveillance.” 2020. Centers for Disease Control and Prevention. February 11, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html>.

¹⁰ “_____.” 2020b. Centers for Disease Control and Prevention. February 11, 2020.

<https://www.cdc.gov/coronavirus/2019-ncov/covid-data/covid-net/purpose-methods.html>.

¹¹ “Gap Closed: The Affordable Care Act’s Impact on Asian Americans’ Health Coverage.” 2020. www.commonwealthfund.org, July. <https://doi.org/10.26099/3nfg-9r27>.

<https://www.commonwealthfund.org/publications/issue-briefs/2020/jul/gap-closed-aca-impact-asian-american-coverage>.

¹² National Council of Asian Pacific Islander Physicians. 2015. “The Impact of the Affordable Care Act on Asian Indian, Chinese, Filipino, Pakistani, and Vietnamese Americans.” [www.ncapip.org](http://ncapip.org).

http://ncapip.net/resources/2015-ACA-policy-brief_v13-final.pdf.

¹³ U.S. Department of Health and Human Services. 2021. “Health Insurance Coverage Changes Since Implementation of the Affordable Care Act: Asian Americans and Pacific Islanders.” www.aspe.hhs.gov. <https://aspe.hhs.gov/sites/default/files/private/pdf/265581/aspe-uninsured-trends-aapi-ib.pdf>.

There is urgent need for the CDC and those offices within Health and Human Services (HHS) that have yet to disaggregate AA and NHPI data to do so, given that the option to do so is available under the current data standards.

Education

While aggregate data report that Asian Americans surpass all other racial groups in educational attainment, disaggregated data reveals a much more nuanced picture. Although 50% of Asian Americans in general hold a bachelor's degree, disaggregated data demonstrate that less than 20% of Cambodian, Hmong, Laotian, and Bhutanese groups have even attended college.¹⁴ Among Native Hawaiians and Pacific Islanders, 57.9% of Samoans, 56.8% of Tongans, 53% of Native Hawaiians, and 49.3% of Guamanians or Chamorros have not attended college.¹⁵ Furthermore, Marshallese and Samoan adults are less likely to hold a bachelor's degree than any other racial group.¹⁶ Based on data from 2018, AANAPISIs enroll one out of every 3 AA and NHPI students at four-year institutions and over half of all AA and NHPI students at two-year institutions. Despite this, AANAPISIs are severely underfunded and receive the least funding per capita of all Minority Serving Institutions.¹⁷

It is therefore critical that the Department of Education collect and release disaggregated data for AA and NHPI students, in order to facilitate educational equity. Similarly, noting that the threat of violence and harassment for Asian Americans have seen the largest rise during the COVID-19 pandemic,¹⁸ it is necessary to properly assess its impact on students via the Department of Education's Civil Rights Data Collection (CRDC); additional reports measuring the impact of COVID-19 should be made accessible, similar to ED OCR's recent report, *Education in a Pandemic: The Disparate Impacts of COVID-19 on America's Students*.

Housing and Economy

Income distribution among Asian Americans is the most unequal out of all racial and ethnic groups; Asian Americans in the 10th percentile make 10.7 times as much as Asian Americans in the 90th percentile.¹⁹ Although the median annual household income of Asian Americans in 2019 was \$85,800,

¹⁴ ———. 2022c. "Key Facts about Asian Americans, a Diverse and Growing Population." *Pew Research Center*, October 10, 2022. <https://www.pewresearch.org/fact-tank/2017/09/08/key-facts-about-asian-americans>.

¹⁵ APIA Scholars. 2019. "Native Hawaiians and Pacific Islanders in Higher Education." [www.apiascholars.org. https://apiascholars.org/wp-content/uploads/2019/12/NHPI_Report.pdf](https://apiascholars.org/wp-content/uploads/2019/12/NHPI_Report.pdf).

¹⁶ Empowering Pacific Islander Communities. 2014b. "Native Hawaiians and Pacific Islanders in the United States: A Community of Contrasts." [www.empoweredpi.org. https://www.empoweredpi.org/s/NHPI-Demographic-Profile-National.pdf](https://www.empoweredpi.org/s/NHPI-Demographic-Profile-National.pdf).

¹⁷ National Council of Asian Pacific Americans. 2020. "Strengthening Asian American and Native American Pacific Islander Serving Institutions through Policy and Practice." [Www.Ncapaonline.Org. https://www.ncapaonline.org/wp-content/uploads/2020/10/NCAPA-AANAPISI-Brief.pdf](https://www.ncapaonline.org/wp-content/uploads/2020/10/NCAPA-AANAPISI-Brief.pdf).

¹⁸ U.S. Department of Education. 2021. "Education in a Pandemic: The Disparate Impacts of COVID-19 on America's Students." [Www.Ed.Gov. https://www2.ed.gov/about/offices/list/ocr/docs/20210608-impacts-of-covid19.pdf](https://www2.ed.gov/about/offices/list/ocr/docs/20210608-impacts-of-covid19.pdf).

¹⁹ ———. 2020b. "Income Inequality in the U.S. Is Rising Most Rapidly Among Asians." *Pew Research Center's Social & Demographic Trends Project*, August 21, 2020. <https://www.pewresearch.org/social-trends/2018/07/12/income-inequality-in-the-u-s-is-rising-most-rapidly-among-asians>.

this figure included incomes ranging from \$44,000 per year for Burmese American households to \$110,000 per year for Indian American households.²⁰ Similarly, among Native Hawaiian and Pacific Islander, the average household incomes for Guamians and Fijians in 2015 were slightly above the US median income average of \$56,516, but “Other Micronesians” households made about \$30,000 per year.²¹

12.3 percent of Asian Americans live below the federal poverty level but disaggregation shows the wide range masked by this single number, with 6.8 percent of Filipino Americans to 39.4 percent of Burmese Americans living in poverty.²² NHPI communities have median household incomes less than two-thirds that of Asian American groups, but are often combined with AA groups, obscuring this significant and important difference.²³

Likewise, the difference between AA and NHPI women's earnings compared to white, non-Hispanic men, is also masked by using an overall number for our communities: the wage gap for AA and NHPI women as a group is 80 cents to the dollar, however, disaggregated data reveals that women of certain ethnic groups, particularly Southeast Asians and Pacific Islanders, experience much greater wage gaps²⁴. Hmong, Native Hawaiian, Vietnamese, and Tongan women make just 62, 61, 56, and 52 cents to the dollar, respectively.

Homeownership among AA and NHPs also reveals that while as an aggregate group, 58 percent of AA and NHPs are homeowners, rates of homeownership vary widely with 25 percent of Samoan, 28 percent of Burmese, and 28 percent of Tongan Americans being homeowners, while 62 percent of Filipinos, 62 percent of Chinese Americans, 64 percent of Vietnamese, 64 percent of Japanese, and 68 percent of Taiwanese Americans are homeowners.²⁵ Among low-to-moderate income AA and NHPI households, 37 percent of Asian households and 22 percent of NHPI households owned homes compared to 53 percent of low-to-moderate income white households.²⁶

²⁰ Budiman, Abby, and Neil G. Ruiz. 2021b. “Key Facts about Asian Americans, a Diverse and Growing Population.” Pew Research Center, April 29, 2021. <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans>.

²¹ Clemens, Austin. 2020. “How Data Disaggregation Matters for Asian Americans and Pacific Islanders.” Equitable Growth, August. <https://equitablegrowth.org/how-data-disaggregation-matters-for-asian-americans-and-pacific-islanders>.

²² “Asian Americans Are Falling through the Cracks in Data Representation and Social Services.” 2018. Urban Institute. June 19, 2018. <https://www.urban.org/urban-wire/asian-americans-are-falling-through-cracks-data-representation-and-social-services>.

²³ AAPI Data. 2017. “State of AAPIs: Income and Poverty (2014).” AAPI Data, October. <https://aapidata.com/state-aapis-income-poverty-2014-2>.

²⁴ National Women’s Law Center. 2023. “Some Asian American, Native Hawaiian, and Pacific Islander Women Lose over \$1 Million over a Lifetime to the Racist and Sexist Wage Gap.” www.nwlc.org. <https://nwlc.org/wp-content/uploads/2023/03/AANHPI-Wage-Gap-3.28.23.pdf>.

²⁵ “New Data on Homeownership by API Subgroups Uncovers Gaps by Ancestry | National Equity Atlas.” n.d. https://nationalequityatlas.org/homeownership_korean_ancestry.

²⁶ “Crisis to Impact: Reflecting on a Decade of Housing Counseling Services in Asian American and Pacific Islander Communities.” 2021. www.Nationalcapacd.Org. https://www.nationalcapacd.org/wp-content/uploads/2021/03/NationalCAPACD_HousingCounselingReport_final_031221.pdf.

Aggregated data on economic indicators like homeownership, credit score, and household income are unreliable for adequately identifying AA and NHPI needs. For example, Asian Indian and Chinese borrowers are often welcomed by banks and offered low interest rates and closing fees, while other AA and NHPI groups such as Native Hawaiians, Filipinos, and Vietnamese often find themselves with higher-cost loans offered by mortgage companies.²⁷

There is an urgent need for disaggregated data from all Agencies collecting or providing data related to housing, earnings, wages, labor, banking, and other financial services. As mentioned earlier, Consumer Financial Protection Bureau's Home Mortgage Disclosure Act (HMDA) data has made great improvements in this direction and should be considered a model advancement in data equity that can be adopted by other Agencies working with consumer financial data.

Immigration

Approximately 57% Asian Americans were born in another country, and Asian Americans are projected to become the nation's largest immigrant group by 2050. Predictably, immigration histories and patterns differ among the many Asian American ethnic groups and also frequently inform communities' unique needs and conditions. For example, only 27% of Japanese Americans are immigrants because significant waves of Japanese immigration occurred in the 19th century as laborers moved to Hawaiian plantations. By contrast, 85% of Bhutanese Americans are foreign born as many arrived recently as refugees.²⁸ Southeast Asian refugees from Vietnam, Cambodia, and Laos constitute the largest group to be resettled in American history. Immigration is also a complex issue for Pacific Islanders as many NHPIs are U.S. citizens but others are foreign-born or hold different types of immigration statuses. Some Pacific Islanders are considered US nationals because they come from US territories, and others are considered migrants and lawfully present non-citizens from Compact of Free Association (COFA) countries, which includes the Republic of the Marshall Islands (RFI), the Federated States of Micronesia (FSM), and the Republic of Palau. Other Pacific Islanders are foreign nationals and must apply for legal permanent resident status. Others still are undocumented.²⁹

Disaggregated data on undocumented AA and NHPI can provide clarity about the needs of these particularly vulnerable immigrants in our communities. Of the estimated 1.7 million undocumented Asian Americans, 26 percent are Indian, 22 percent are Chinese, 14 percent are Filipino, 10 percent are South Korean, 7 percent are Vietnamese, 3 percent are Pakistani, and another disaggregated 17 percent are from other Asian countries.³⁰ Disaggregated data on undocumented Pacific Islanders is more difficult

²⁷ Richardson, Seema Agnani and Jason. 2022. "Mortgage Lending in the Asian American and Pacific Islander Community » NCRC." NCRC (blog). March 8, 2022. <https://ncrc.org/mortgage-lending-in-the-asian-american-and-pacific-islander-community>.

²⁸ Budiman, Abby, and Neil G. Ruiz. 2021c. "Key Facts about Asian Americans, a Diverse and Growing Population." Pew Research Center, October 10, 2022. <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans>.

²⁹ https://advancingjustice-la.org/sites/default/files/A_Community_Of_Contrasts_NHPI_CA_2014.pdf

³⁰ AAPI Data. 2020. "Data on Undocumented Asian Americans - AAPI Data." January 30, 2020. <https://aapidata.com/undocumented>.

to find, creating roadblocks for community advocacy, but California data on deported Pacific Islanders can offer a glimpse into the disparities and urgent needs of NHPs. Between 2001 and 2011, approximately 1,200 NHP residents were deported from California to the Pacific Islands with approximately 80 percent of the people deported being sent to Fiji. Another 15 percent were deported to Tonga and 4 percent were deported to Samoa.³¹

Additionally, examining visa backlogs based on country can reveal which specific AA and NHP communities are most impacted by waitlists, delays, and backlogs that have plagued our family-based immigration system for years. In FY 2021, immigrants from the Philippines, India, China, Vietnam, Bangladesh, and Pakistan make up the second, third, fourth, fifth, and seventh, and eighth largest numbers of backlogs respectively.³²

Without disaggregated data on AA and NHP communities on immigration and documentation status from Department of Homeland Security (DHS) and United States Customs and Immigrations Services (USCIS), these nuances of AA and NHP community members immigration histories and related needs go undocumented and unmet.

Language Access

In 2019, 67.8 million people in the U.S. reported speaking a language other than English at home, and more than 25.5 million people—nine percent of the U.S. population—are LEP. Approximately 32 percent of AA and NHPs in the U.S. are foreign born and more than 6 million AA and more than 100,000 NHPs are limited English proficient. The federal government has recognized the importance of language access for LEP individuals. Federal law and regulations, including Title IV of the Civil Rights Act of 1964, Section 1557 of the Affordable Care Act, and Executive Order 13166 issued in 2000, establish civil rights obligations for the government to provide language access protections for LEP persons. The Stafford Act requires FEMA to “identify in coordination with State and local governments, population groups with limited English proficiency and take into account such groups in planning for an emergency or major disaster.” The HHS Office of Minority Health created National Standards for Culturally and Linguistically Appropriate Services in Health Care as a guide for health care providers; and of the 14 standards, there are four that relate directly to language access.

Only a small handful of Federal Agencies have attempted to disaggregate Asian American and Native Hawaiian and Pacific Islander data

As a testament to the pressing need for data disaggregation for AA and NHP communities, in recent years, a small handful of federal government efforts have gone beyond the minimum requirements of

³¹ Empowering Pacific Islander Communities. 2014c. “Native Hawaiians and Pacific Islanders in the United States: A Community of Contrasts.” www.empoweredpi.org. <https://www.empoweredpi.org/s/NHPI-Demographic-Profile-National.pdf>.

³² U.S. Department of State. 2022. “Annual Report of Immigrant Visa Applicants in the Family-Sponsored and Employment-Based Preferences Registered at the National Visa Center as of November 1, 2020.” [Www.State.Gov](http://www.State.Gov). https://travel.state.gov/content/dam/visas/Statistics/Immigrant-Statistics/WaitingList/WaitingListItem_2020_vF.pdf.

SPD 15. The Census Bureau, based on their research findings, used detailed checkboxes and write-in answers. For Asian Americans, the format listed 7 checkboxes (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese, and Other Asian), followed by a write-in section for respondents to enter other Asian identities (“e.g., Pakistani, Cambodian, Laotian, and Hmong”). For Native Hawaiians and Other Pacific Islanders, the question listed 4 checkboxes (Native Hawaiian, Samoan, Chamorro, and Other Pacific Islander), followed by a write-in section to enter other NHPI identities (“e.g., Tongan, Fijian, and Marshallese”).

Similarly, the Department of Health and Human Services (HHS) collects race and ethnicity data by asking separate questions for ethnicity, then race; for Asians, the HHS uses the same 7 categories as the 2020 Census (Asian Indian, Chinese, Filipino, Japanese, Korean, Vietnamese, and Other Asian). For Native Hawaiians and Other Pacific Islanders, the HHS uses 4 categories (Native Hawaiian, Guamanian or Chamorro, Samoan, and Other Pacific Islander)³³.

The Health Center Program Uniform Data System (UDS) and Federally Qualified Health Centers already collect disaggregated AA and NHPI data but aggregate that data when reporting publicly. UDS currently only reports data for topline Asian, Native Hawaiian, and Other Pacific Islander categories, and does not allow for health centers to report more granular data.

The Consumer Financial Protection Bureau (CFPB)’s collection of Home Mortgage Disclosure Act (HMDA) data collection may be the most progressive of the federal Agencies to date, having included detailed race and ethnicity categories since 2018.

However, most Agencies and offices, with the exception of the few listed above, do not disaggregate AA and NHPI data despite the permissibility to do so under the current OMB standards. The current aggregate options are egregiously inadequate to reflect our communities’ needs. Disaggregated data across datasets and programs of the various federal Agencies is long overdue, and urgently needed.

The Federal Interagency Technical Working Group’s initial proposals are in danger of falling short of community recommendations in crucial areas

- 1) The current proposed minimum category format (*Figure 3* in the current Federal Register Notice³⁴), like the question format in the 1997 SPD 15, does not capture the disaggregated data needed for AA and NHPI populations. **In order to have uptake by Agencies of the detailed format that our communities need, we support the proposal to require the detailed data collection format (*Figure 2* in the current FRN). However, if an Agency believes that the benefit of disaggregating does not outweigh the burden or risk of doing so, rather than being allowed to unilaterally default to the minimum category format (*Figure 3*), the Agency should**

³³ U.S. Department of Health and Human Services. “HHS Implementation Guidance on Data Collection Standards for Race, Ethnicity, Sex, Primary Language, and Disability Status.” n.d. ASPE. <https://aspe.hhs.gov/basic-report/hhs-implementation-guidance-data-collection-standards-race-ethnicity-sex-primary-language-and-disability-status>.

³⁴ “Regulations.Gov.” n.d. <https://www.regulations.gov/document/OMB-2023-0001-0001>.

apply for an exception from OMB or a third party, which should involve a fact-finding assessment, including publicizing the application and soliciting input from the public on the application. Given that most Agencies have failed to adopt the disaggregation options currently available under SPD 15, a waiver process that includes public input is necessary. Without the detailed format question, no progress will have been made in data collection on AA and NHPI populations since the last revision in 1997.

- 2) The need for disaggregating the current minimum categories for Asian Americans, Native Hawaiians, and Pacific Islanders cannot be overstated. The lack of disaggregated data on our communities currently poses an insurmountable barrier to equity for AA and NHPI people. **In order to adequately reflect the needs of our communities, the federal minimum standard should include, at minimum, the categories used in the 2020 Census and American Community Survey.** The 2020 Census listed the following checkbox options for Asians: Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese, and Other Asian; and the write-in section named Pakistani, Cambodian, and Hmong as examples. We recommend separate collection categories with checkboxes for the following populations: Chinese, Asian Indian, Filipino, Japanese, Korean, Vietnamese, Pakistani, Cambodian, Hmong, Laotian, Thai, Taiwanese, Burmese, Bangladeshi, and Nepalese (the most populous communities with at least 200,000 population, including some of the most socioeconomically vulnerable populations), in addition to the 'Other Asian' write-in category. The 2020 Census also listed the following checkbox options for Native Hawaiians and Pacific Islanders: Native Hawaiian, Samoan, and Chamorro; and the write-in section named Tongan, Fijian, and Marshallese as examples. We recommend the federal minimum standard expand collection to include all of the following populations instead: Native Hawaiian, Samoan, Chamorro, Tongan, iTaukei, Marshallese, and Other Pacific Islander write-in category.
- 3) **The write-in option under 'Other' in the data collection questions must be retained.** The proposal to use only close-ended categories with no option for write-in would erase the identity of up to 365,000 or 22.7% of Native Hawaiian and Pacific Islanders^{3b}, and 800,000 or 3.5% of Asian Americans^{2b} currently counted under their respective 'Other' categories; while only 7.9% of NHPI and 1.4% of AA wrote-in their identity, as advocates continue to reach community members, the percentage of write-ins is expected to grow. Removing the write-in option altogether would erase the identity of at least 1,165,000 AA and NHPI people and would be a step backwards that our communities cannot afford.
- 4) **Agencies should collect disaggregated data on Asian American and Native Hawaiian and Pacific Islanders, even if they are currently not able to publish them.** Agencies have reported such data in more recent years, where possible, with the help of innovative statistical techniques, in order to meet the needs of communities. The Census Bureau, for example, has reported such data from the American Community Survey by minimally aggregating them as necessary and introducing statistical noise to protect privacy in the case of smaller sample sizes. While these data are less accurate when treated in this way, they are indispensable to advocates in identifying the needs of the community by providing more actionable data rather than no

data at all. Additionally, as more new statistical methods are innovated, having longitudinal data on our rapidly growing communities that can be reported even retrospectively would be invaluable for policy-making, research, and advocacy purposes.

- 5) **Further research is needed on better ways to count several groups who identify with more than one or sometimes no national origin, for various historical reasons.** Montagnard, Okinawan, Indo-Fijian, Malay, Urdu, Indo-Caribbean, and other AA and PI groups are some of the populations whose complex histories defy counting under a single or sometimes any national origin category. To avoid having these groups be undercounted and erased under the 'Other' categories, more research and community input is needed to better define and better count these populations.

At the same time, community input on these and other questions on identity and self-identification should be regularly and frequently incorporated into the research and testing process. Ultimately, both national origin and ethnic identity are important aspects of immigrant identity, and neither is universally more significant than the other. A more accurate approach would see data collected on both national origin and ethnic identity for all immigrants, so that depending on the particular analysis or application, one or both can be used. Finally, the conflation of race with national origin in data collection is of great concern and community input should be solicited on more appropriate framing of these interlinked identities in data collection and analysis.

Conclusion

Advocates, as well as researchers, and federal agencies have noted the need for detailed data on Asian American and Native Hawaiian and Pacific Islanders for the last two decades. The lack of disaggregated data on AA and NHPI populations poses an insurmountable barrier to equity for our communities. Without an update to the minimum standards to collect detailed data, the challenges our communities face towards equity in the economy, health, education, immigration, and housing will only compound as our communities continue to grow. OMB must update the minimum standards to collect detailed data, including the write-in option (even in cases where it is not currently possible to publish the data), and with any exceptions requiring waivers.

At this halfway point between the last review of the minimum categories in 1997 and the inflection point of 2065 when Asian Americans are projected to become the largest immigrant group in the country, now is the time is for the long overdue update to the federal data standards to disaggregate AA and NHPI data.

Sincerely,

National Council of Asian Pacific Americans
18 Million Rising
AAPI Data

AAPI Equity Alliance
ACDC Texas
Act To Change
Alaska Chapter JAAC
APIA Scholars
APIDA
AREAA
Asian American Association of New Mexico
Asian American Center of Frederick
Asian American Federation of Florida - South Region
Asian American Research Center on Health
Asian American Resource Workshop
Asian American Scholar Forum
Asian American Task Force
Asian Americans Advancing Justice - AAJC
Asian Americans Advancing Justice | Southern California
Asian and Pacific Islander American Vote (APIAVote)
Asian and Pacific Islander Coalition of WA
Asian Caribbean Exchange
Asian Community Development Corporation
Asian Counseling and Referral Service
Asian Law Alliance
Asian Pacific American Institute for Congressional Studies (APAICS)
Asian Pacific American Labor Alliance, AFL-CIO
Asian Pacific Community in Action
Asian Pacific Fund
Asian Pacific Islander Alliance
Asian Pacific Islander Coalition of Yakima County
Asian Resources, Inc.
Asian Texans for Justice
Association of Asian Pacific Community Health Organizations (AAPCHO)
Berkeley JAAC
CA Commission on Asian and Pacific Islander American Affairs
Cabrillo College
Caribbean Equality Project
Center for Asian American Media
Chicago Japanese American Historical Society
Chinese for Affirmative Action
Chinese Progressive Association Boston
Coalition for Asian American Children and Families (CACF)
College of Alameda
Council of Korean Americans

Eden Township JACL
Empowering Pacific Islander Communities
Filipino American Community of Yakima Valley
Filipino American Service Group, Inc. (FASGI)
Filipino Young Leaders Program (FYLPRO)
Florida Asian Services
Fresno JACL
Hmong American Partnership
Hmong National Development, Inc.
IF JACL
JACL NCWNP District - Civil Rights Committee
JACL San Mateo Chapter
JACL Seabrook Chapter
Japanese American Citizens League
Japanese American Citizens League DC Chapter
Japanese American Citizens League, Sacramento Chapter
Japanese American Citizens League, San Jose Chapter
Japanese American Citizens League, Sequoia Chapter
Japanese American Citizens League, Twin Cities Chapter
Korean Community Center for the East Bay
Laotian American National Alliance
LEAP (Leadership Education for Asian Pacifics)
Liberty Hill Foundation
Middlesex Community College
NAAAP
National Asian American Pacific Islander Mental Health Association (NAAPIMHA)
National Asian Pacific American Bar Association (NAPABA)
National Asian Pacific American Center on Aging (NAPCA)
National Asian Pacific American Families Against Substance Abuse
National Asian Pacific American Women's Forum (NAPAWF)
National Asian Pacific Center on Aging
National Asian Pacific Islander Council-AACC
National CAPACD - National Coalition for Asian Pacific American Community Development
National Federation of Filipino American Associations (NaFFAA)
National Korean American Service & Education Consortium
National Queer API Alliance (NQAPIA)
NCAAT in Action
NICOS Chinese Health Coalition
North Carolina Asian Americans Together (NCAAT)
OCA Asian Pacific American Advocates of Greater Seattle
OCA Asian Pacific Islander American Advocates Utah Chapter
OCA Greater Chicago

OCA Greater Cleveland - Asian Pacific American Advocates
OCA Greater Tucson
OCA San Mateo County
OCA South Florida Chapter
OCA-Asian Pacific American Advocates
OCA-CVC
OCA-Greater Houston
OCA-Greater Philadelphia Chapter
OCA-Greater Washington DC, APA Advocates
Oregonizers
Organization of Chinese Americans - Detroit Chapter
Papa Ola Lokahi
Pasadena City College
Rising Voices
San Diego JACL
Seattle Chapter Japanese American Citizens League (JACL)
SEIU LOCAL 503 Asian Desi Pacific Islander Caucus
SELANOCO Chapter of the Japanese American Citizens League
Sikh American Legal Defense and Education Fund
Skyline College English for Speakers of Other Languages
South Asian American Policy and Research Institute (SAAPRI)
South Asian Bar Association of North America
South Asian Public Health Association
Southeast Asia Resource Action Center (SEARAC)
Stop AAPI Hate
Taiwanese American Citizens League
The Asian American Foundation
The Center for Asian Pacific American Women
The National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship (National ACE)
The Research and Planning Group for California Community Colleges (The RP Group)
Tipping Point Community
UCLA Asian American Studies Center
UTOPIA WA
VAYLA New Orleans
Woodbury Fund