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Submitted via [www.Regulations.gov](http://www.Regulations.gov) by Lloyd Feng, CACF Special Projects Policy Coordinator

## **Re: Comments in Response to FR Document 2023-01635, Initial Proposals for Updating Race and Ethnicity Standards**

Dear Director Young and Chair Sivinski,

The **Coalition for Asian American Children and Families (CACF)** is writing to respond to the Federal Register Notice published on 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 Director No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15).

### **About CACF and Invisible No More**

CACF is the nation's only pan-Asian children and families' advocacy organization bringing together community-based organizations as well as youth and community allies to fight for equity for Asian Americans and Pacific Islanders (AAPI). CACF was founded in 1986 as a volunteer operation by a group of concerned social service providers about the City's inability to serve the rapidly growing numbers of AAPI children and families. Today, CACF is a membership organization of over 80 AAPI-serving community-based organizations in New York City and New York State, representing the diverse diasporic communities of marginalized New Yorkers from East Asia, Southeast Asia, South Asia, West Asia, Southwest Asia, Central Asia, the Caribbean, the Middle East and North Africa, and the Pacific Islands.

For over a decade and counting, CACF has led the Invisible No More Campaign for Asian American Native Hawaiian and Pacific Islander (AANHPI) data equity and data disaggregation in NYC and NYS, working in coalition with AANHPI-serving CBOs and advocates, allies, philanthropies, unions, and electeds. Our goal is to ensure that NYC, NYS, and federal data

collected on Asians and NHPI is disaggregated by ethnic subgroups given the immense diversity and disparity present in our communities.

**Invisible No More** successfully led the fight for data disaggregation, securing major legislative wins: 2021 NYS AANHPI Data Disaggregation Laws and 2016 NYC Demographic Data Laws. CACF is now focused on implementation of these laws to be as inclusive of our communities as possible as well as in paving the way for Black, Latino, White, and Middle Eastern and North African (MENA) communities among others to advocate for their data disaggregation needs.

## **Context on New York City and New York State's Asian American communities**

New York City has long been considered one of the most diverse cities in the United States and the world with a multitude of racial, ethnic, linguistic, and religious communities calling it home. Our track record as a place that welcomes immigrants, encourages self-expression, and accepts difference attracts people from all over the world to settle here. According to the 2021 American Community Survey 5-year estimate, New York City is home to 1,376,527 Asian residents and New York State home to over 2,006,103 Asian residents.

According to the CUNY Graduate Center's March 2023 report "[How Communities of Interest Are Evolving Today](#)," New York City's "broad racial changes were driven by the varying trajectories of the specific ethnic groups that belong to them."

- The vast majority of Asian ethnic populations increased, contributing over half of the city's net population growth (345,472 of 629,415). The following groups experienced an increase in population:
  - Bangladeshi: 45.4%
  - Indian: 26.8%
  - Chinese: 18.4%
  - Pakistani: 10.2%
  - Afro-Asians: 25.1%
  - All other Non-Hispanic Asian: 22.7%
  - All Non-Hispanic Other or Mixed Races: 32.9%

In addition, over the last decade, more individuals have identified as multiracial/multiethnic, more families have become racially mixed, and more neighborhoods have become more racially/ethnically mixed than ever before. Experts forecast that this trend of increasing racial/ethnic and multiracial/multiethnic self-identification will only continue into the next decade. It is, therefore, imperative that New York City update its race/ethnicity data collection standards, systems, and processes in order to accurately capture and understand the city's increasingly diverse population. With these changes, existing racial and ethnic aggregate categories (White, Black, Asian, Hispanic/Latino, etc.) will become steadily less useful and reliable for agencies in

assessing who they serve and who they need to reach. City agencies now already need to include a much more expansive and inclusive set of options for individuals to self-identify.

Most importantly, alongside the growth in NYC's Asian populations, a significant portion of NYC's Asian communities remain marginalized by the lack of disaggregated data. In 2022, the Robin Hood Foundation's Poverty Tracker revealed that [one in four](#) Asian New Yorkers lived in poverty. But this aggregate data does not capture the immense disparities and levels of marginalization between Asian ethnic groups and also *within* each Asian ethnic group. Bangladeshi New Yorkers have a median household income rate of \$55,400—[the lowest among Asian ethnic groups](#)—and Chinese New Yorkers a median household income rate of \$67,000. Meanwhile, Indian New Yorkers have the highest median household income of any Asian ethnic group at \$116,064, but median household income among Indian New Yorkers varies significantly by neighborhood; in Howard Beach/South Ozone Park, the median household income for Indians is almost 19 percent lower at \$94,161. The disparities, of course, extend across issue areas from public health to education, housing insecurity to health insurance enrollment rates. As such, it is critical that OMB, the U.S. Census Bureau, and other federal agencies recognize the fundamental role that disaggregated data serves in representing the needs of marginalized members of NYC's Asian American community.

## **CACF's Core Priorities in Regards to Data Collection on Marginalized Communities**

1. **Self-identification should be the utmost priority in the development of new race and ethnicity standards.** Self-identification is the most reliable method by which the government can collect information on individuals and marginalized communities. Agencies should focus on increasing individual's ability to self-identify as much or as little as possible.
2. **Inclusion, particularly of marginalized groups and groups that have often not been recognized in government data collection, should be the priority of the final race and ethnicity standards.** There is no question that such marginalized groups have the most at stake in this process to revise the race and ethnicity standards. We must seize this historic opportunity to rectify the status quo erasure of entire communities that contribute to America's rich culture and growth.
3. **A community-based approach is essential to understanding how best to design forms, select terminology, and implement federal race and ethnicity standards.** Federal agencies should invest in community-based research during the form design process and in community-based implementation during the implementation process are critical to the development of inclusive race and ethnicity standards that encourage greater self-identification.

## **CACF's Response to the Initial Proposals**

Please see below for CACF's response to each of the initial proposals according to the format provided in the Federal Register Notice:

### *1. Collect race and ethnicity information in one combined question.*

- **CACF strongly supports the initial proposal to collect race and ethnicity information in one combined question.**

*1b. To what extent would a combined race and ethnicity question that allows for the selection of one or more categories impact people's ability to self-report all aspects of their identity?*

- Seeing as individuals already interpret "race" and "ethnicity" differently, especially in relation to how individuals self-identify, CACF recognizes the difficulty in developing a singular prescriptive definition of "race" and "ethnicity." That being said, if the final race and ethnicity standards settle on using "race or ethnicity" or "race and ethnicity" as the standard terminology, it should be consistent in its usage and never use "race" and "ethnicity" separately as that would confuse respondents.
- Within our diverse coalition of Asian-serving CBOs, we often discuss the severe limitations of relying on data that casts East Asians, South Asians, Southeast Asians, and Central Asians broadly under this singular "Asian" racial category that flattens the distinct cultural, linguistic, and historical contexts between these regional groups. There have been countless times when South Asians, Southeast Asians, and Central Asians have felt that the term "Asian," used by the media, government, electeds, or in general discourse is not inclusive enough of individuals outside of East Asian groups; oftentimes, "Asian" is used to really refer to East Asians and not others. With this history of exclusion and erasure within Asian Americans in mind, CACF feels that a combined race and ethnicity question would encourage more self-reporting from Asian community members, *but only if the form design includes heretofore marginalized Asian groups (transnational groups).*
- Moreover, by using a combined race and ethnicity question, which inherently broadens respondents' interpretation of the definition of "ethnicity" to not solely refer to "Hispanic or Latino" self-identification, Asian respondents may feel more comfortable self-reporting. It is not uncommon for some individuals to identify more strongly with an Asian ethnic subgroup like "Korean" or "Pakistani" rather than the broader aggregate category "Asian," especially among recent immigrants for whom "Asian" is an unfamiliar or nonsensical term; "Asian" has little utility as a self-identifier in Asian countries of origin where nationality-based or ethnic-based identifiers and differences are far more salient and relevant. In responding to a combined race and ethnicity question with a more inclusive definition of "ethnicity" that encompasses groups outside of the "Hispanic or Latino" minimum category, more Asian respondents may feel that their ethnicity is

accepted, which could then encourage greater self-response to the question of race.

*1c. If a combined race and ethnicity question is implemented, what suggestions do you have for addressing challenges for data collection, processing, analysis, and reporting of data?*

- **If a combined race and ethnicity question is implemented, CACF recommends that government forms seeking race and ethnicity information include language that explains the constantly evolving and sociopolitical nature of such terminology in order to establish a baseline understanding of the scope of such terms to the respondent.**
- **CACF also strongly recommends that OMB, the U.S. Census Bureau, and other federal agencies make early investments in community engagement with marginalized Asian populations, the very groups that are in most dire need of revised federal race and ethnicity standards that will explicitly include them.**

*1d. What other challenges should we be aware of that respondents or agencies might face in converting their surveys and forms to a one question format from the current two-question format?*

- CACF recommends that government forms seeking race and ethnicity information include language that explains the evolving sociopolitical nature of such terminology in order to establish a baseline understanding of the scope of such terms to the respondent as well as to include language that explains the motivations of increasing self-identification and inclusion behind such changes. Please include translated materials of this language in all Asian languages that correspond to the Asian population groups on which the OMB seeks to collect more granular information in order to demystify any misinformation and disinformation about the race and ethnicity standards changes that have already arisen among community members.

*2. Add “Middle Eastern and North African” (MENA) as a new minimum category.*

- **CACF strongly supports adding “Middle Eastern and North African” (MENA) as a new minimum category.**
- For too long, MENA ethnic groups have been rendered invisible in federal race and ethnicity standards since they explicitly ascribed MENA ethnic groups as “White.” This classification has created barriers for MENA communities from accessing the resources and support they need; MENA small-business owners are often denied access to government funding to minority-owned small-business owners given the federal standards’ definition of MENA as “White.” MENA ethnic groups deserve their own distinct minimum category in recognition of their unique needs.



- On this matter, CACF supports the public comments by Arab American Institute (AAI) and the National Network for Arab American Communities (NNAAC).
- As aforementioned, CACF's membership includes organizations that primarily offer direct services to MENA communities (1/8 of our membership), which at first glance, may strike people as odd for an explicitly Asian-serving organization to feature. However, CACF, led by our core value of inclusion and the shared fight for justice and equity, welcomed MENA-serving CBOs that as a result of systemic erasure in federal, state, and local data collection, struggled to receive the attention and funding their communities needed. In our coalition, such organizations could receive more visibility and advocate for greater resources and services. Our MENA-serving member organizations were also some of our staunchest allies in our Invisible No More Campaign. Although the first decade of the campaign focused on the need for disaggregated data on Asians and NHPI in NYC and NYS, MENA-serving organizations steadfastly advocated with us, knowing that all our communities share the need for data equity. Moreover, our 2021 historic legislation mandating AANHPI data disaggregation across NYS agencies has already set the stage for legislative efforts for MENA data disaggregation in NYS in the 2023-2024 legislative session.

*2a. Given the particular context of answering questionnaires in the U.S. (e.g., decennial census, Federal surveys, public benefit forms), is the term "Middle Eastern or North African (MENA)" likely to continue to be understood and accepted by those in this community? Further, would the term be consistently understood and acceptable among those with different experiences, i.e., those born in the U.S., those who immigrated but have lived for an extensive period of time in the U.S., and those who have more recently immigrated to the U.S.?*

- We stand with our MENA-serving member organizations who are in full support of the proposed change despite imperfections of the term "MENA" as this would still be a historic first step to finally making visible entire communities of people who have never received the recognition in government data collection that they deserve and so desperately need.
- **CACF strongly recommends that OMB, the U.S. Census Bureau, and other federal agencies all invest in community-driven engagement early on prior to implementation of the eventual final federal race and ethnicity standards in order to conduct the necessary community education to help people understand the motivations behind the change and to empower them to self-identify using "MENA."** CACF urges federal agencies to provide ample funding for such efforts directly to local CBOs that are the community experts and trusted partners of marginalized communities.

*2b. Do these proposed nationality and ethnic group examples adequately represent the MENA category? If not, what characteristics or group examples would make the definition more representative?*

- CACF supports the Arab American Institute (AAI) definition of MENA that is inclusive of transnational groups like Armenians, Amazigh, Assyrians, and Chaldeans. CACF also supports the recommendations and research provided by the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).

*2c. Would this proposed definition allow the generation of statistics necessary to track the experience and wellbeing of the MENA population?*

- On this matter, CACF supports the Public Comment of the Arab American Institute (AAI) and the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).

*3. Require the collection of detailed race and ethnicity categories by default.*

- **CACF strongly supports a requirement for agencies to collect detailed race and ethnicity categories by default.**
- Aggregate data has become increasingly less useful in understanding the needs of diverse AANHPI communities. As aforementioned, over the last decade, New York City has experienced immense changes in population composition, spurred by different waves of Asian immigrants from East Asia, South Asia, West Asia, Southeast Asia, and the Caribbean. Amid such important changes in population, it is critical for policymakers, advocates, the media, and community members themselves to understand the diverse and disparate needs within such communities. Immense socioeconomic and linguistic disparities not only between Asian ethnic groups, but also within a single Asian ethnic group reflects this urgent need for all stakeholders to be equipped with an accurate understanding of our communities' needs. In 2020, NYC released aggregate race and ethnicity data on Covid infection, hospitalization, and mortality rates that showed that Asians were the least impacted by Covid. However, our community-based organizations understood that the data was not reliable, as they grappled first-hand with Covid's devastating impact on Asian communities. Our research partner, the Center for the Study of Asian American Health (CSAAH), was able to [demonstrate](#) the dangers of the government relying on aggregate racial data using a basic surname analysis; it showed that Chinese New Yorkers faced the highest mortality rate and that South Asian New Yorkers faced the highest infection and hospitalization rates of any racial or ethnic group. The revised standard must require government agencies to collect disaggregated data and use detailed race and ethnicity categories, otherwise, it will further harm our most marginalized communities.

*3a. Is the example design seen in Figure 2 inclusive such that all individuals are represented?*

- CACF is concerned that the “Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories” is neither explicit enough nor inclusive enough of populations and groups in each minimum category, which poses the following problems for respondents to fully self-identify and agencies to collect granular disaggregated data:
  - **The decision to only provide six detailed minimum categories in the form of checkboxes under each minimum category is not only confusing for respondents, but also harmful in erasing entire communities.** It is unclear to our member organizations and community members as to how the U.S. Census Bureau decided upon the number of six for the detailed minimum categories for explicit inclusion in the form of checkboxes under each minimum category. The fact that only six are explicitly included may give respondents whose self-identifying group is not explicitly listed as a checkbox the impression that their group is not “Asian,” thus discouraging people from self-identifying as “Asian” and leading to less accurate data collected. We do not recommend that the OMB solely rely on a standard of explicitly including only the most populous populations under each minimum category. We recommend that the OMB expand the number of checkboxes provided for detailed minimum categories.
  - **The explicit inclusion of detailed minimum groups by population size is not inclusive of many groups that are considered Asian, many of which are the very groups that government data collection has consistently neglected and that urgently need to be seen and recognized in government data collection.** It appears that the rationale to determine which groups to include as detailed minimum categories in the form of checkboxes is based on population at the national level. Under the “Asian” minimum category, the only detailed minimum categories explicitly included in the form of checkboxes are “Chinese,” “Filipino,” “Asian Indian,” “Vietnamese,” “Korean,” and “Japanese.” These are the top six most populous Asian ethnic groups nationally. This population-based standard may lower responses from Asian populations outside of the top six, particularly, among smaller populations—many of which are refugee populations—that are often most marginalized in access to public resources and investment, policymakers, and the electoral process. If the OMB continues to use checkboxes, it must develop a more inclusive design that explicitly includes transnational groups.



- **The justification behind explicitly including some detailed minimum categories as checkboxes and others as examples of groups in the write-in section and not others is not provided and thus, may lead to confusion and questioning of the motivations behind the question.** What is the justification for displaying “Chinese,” “Filipino,” “Asian Indian,” “Vietnamese,” “Korean,” and “Japanese” as checkboxes, but not the detailed minimum categories listed as examples, “Pakistani,” “Cambodian,” or “Hmong”? It strikes our member organizations as arbitrary and potentially disrespectful, especially without any explanation provided. (See Appendix Figure 2)
- **[On write-in response] The write-in response opportunities provided in the initial proposals are not sufficient to encourage respondents to fully self-identify.** The 2020 Census Questionnaire utilized a write-in option under each minimum category that only allotted 16 boxes for each write-in response despite there being almost a quarter of the page going unused (see Appendix Figure 2). The OMB should consider maximizing available page space for write-in responses and should not use the existing format of an individual box for each character. In doing so, the OMB would encourage far more granular self-identification from respondents. CACF recommends providing write-in response space for at least a paragraph’s worth of response (equivalent to 3-4 lines).
- **[On transnational and diasporic populations] The example is *not* inclusive of transnational and diasporic populations as it currently relies almost entirely on nationality-based/country of origin-based standards for developing detailed minimum categories and does not explicitly include transnational and diasporic populations that are consistently neglected in government data collection.** Currently, this nationality-based/country of origin-based approach to categorization inherently racializes country of origin self-identification, which erases the many ethnic subgroups within those countries. Such harm should be avoided altogether in the final race and ethnicity standards. Because of the lack of recognition of such groups in government data collection standards, their needs remain unseen and misunderstood. Many transnational and diasporic communities in New York City and the U.S. fled political persecution and discrimination from the places they came from. As such, this opportunity to amend the OMB’s race and ethnicity standards to explicitly include transnational

communities that CACF and its member organizations serve. We recommend explicitly including transnational populations as detailed minimum categories under each minimum category; for instance, “Indo-Caribbean,” “Punjabi,” “Bengali,” “Tibetan,” “Uyghur,” etc.

- **[On multiethnic self-identification]** There currently exists no clear way for a person to indicate self-identification as more than one detailed minimum category, especially if the two or more detailed minimum categories are not explicitly included within the same aggregate minimum category, especially for groups that do not have a detailed checkbox. For instance, if a respondent wishes to self-identify as “Japanese” and “Peruvian,” but does not self-identify as “Hispanic or Latino,” the respondent would currently struggle to avoid having to also indicate “Hispanic or Latino” given the form design that necessitates a “race” or minimum category designation even if an individual does not self-identify with the corresponding minimum category. This again is an issue related to the nationality-based/country of origin-based approach to characterizing detailed minimum categories within minimum categories. CACF strongly recommends significant explanatory language at the beginning of the form that includes examples as to how a person who self-identifies in different ways can fill out this form. CACF also strongly recommends the provision of more write-in space, including a write-in space either before or after any mention of the minimum and detailed minimum categories. CACF urges more research into form design that would maximize accurate self-identification for individuals self-identifying as multiple ethnic groups, but not necessarily multiple racial groups or minimum categories.
- **[Transracial and transnational adoptees]** The example is *not* inclusive of transracial and transnational adoptees with the lack of explicit instructions that indicate how such individuals should consider self-identification. Our member organizations that work with adopted youth have shared the experience of filling out race and ethnicity demographic forms currently unnecessarily raises stressful and painful feelings linked to a lack of belonging; individuals adopted from an Asian country or from an Asian birth parent may interpret the intent behind race and ethnicity questions as focused on capturing “ancestry” information, which may be stressful if the individuals do not have relevant information on their birth parents’ ancestry. Moreover, transracial and transnational

adoptees from Asia or from an Asian birth parent often face the dilemma as to whether they should list their own race and ethnicity as aligned with those of their adoptive parents and family, as aligned with those of their Asian birth parent, or both. CACF recommends clarifying the “Asian” definition to be inclusive of transracial and transnational adoptees to encourage such individuals to self-identify as “Asian.”

- **[Include “Unsure” or “Do Not Know”]** On this matter, CACF supports the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).
- **[Ideal outcome]** CACF recognizes that this process of updating race and ethnicity standards reflects constant changes within society, and as such, will require—hopefully, more regular—changes in the coming years and decades. Therefore, we fully understand that there is no perfect set of race and ethnicity standards that will be acceptable to all individuals and groups in American society. But in keeping with our priority of encouraging full self-identification aligned with the OMB’s own guiding principle of respecting individuals and facilitating “self-identification to the fullest extent possible,” CACF proposes the following format that we feel is most inclusive of marginalized Asian communities at this point:
  - The form should begin with language explaining the reasons for collecting race and ethnicity information. It should also include a definition of “race and ethnicity” that emphasizes the constantly changing nature of those terms. This part of the form should also include language and instructions relevant to individuals self-identifying with a transnational/diasporic group, as an adoptee, or with multiple racial/ethnic groups.
  - The form should include a modified version of the Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories (Appendix, Figure 1) that instead of checkboxes for a limited number of detailed minimum categories, provides more examples of possible answers that include both nationality-based groups and transnational/diasporic groups. Removing the arbitrary nature of which group receives a checkbox would create more physical space for providing examples of the diverse groups that people can identify as. The form design should also be clear in enabling individuals to select multiple minimum categories (multiracial) and/or multiple ethnic groups (multiethnic).
  - The form should include “Not Listed” and “Unsure/Don’t Know” as selections alongside the minimum category options.

- The form should have another section that asks “How do you self-identify?” with a write-in response that can accommodate at least 3-4 lines. People should be encouraged to respond using fragments, bullets, full sentences, or not at all. The write-in response should not be displayed as a box for each character as it was in the 2020 Census Questionnaire.

*3b. The example design seen in Figure 2 collects additional detail primarily by country of origin. What other potential types of detail would create useful data or help respondents to identify themselves?*

- **CACF is deeply concerned by the example’s reliance on existing nationality-based/country of origin-based categories as the detailed minimum categories since such a move perpetuates the continued systemic erasure of already marginalized communities.** For instance, in providing detailed minimum categories nationality-based/country of origin-based categories like “Jamaican,” “South African,” and “Barbadian” under the “Black or African American” minimum category, the “Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories” is implicitly equating identification with these nationality-based/country of origin-based detailed minimum categories with identification with “Black or African American.” However, not all individuals who identify with “Jamaican,” “Barbadian,” and other Caribbean nationality-based/country of origin-based detailed minimum categories would self-identify with “Black or African American” as evidenced by vibrant communities of Indo-Caribbeans. CACF’s member organizations that serve NYC’s Indo-Caribbean community—arguably the largest and fastest growing Indo-Caribbean community in the entire country—have consistently raised the harm such an approach inflicts on a community of people already marginalized by government institutions and services in so many other aspects of their lives. This approach imposes severe barriers to self-identification for Indo-Caribbean individuals who may wish to identify with a country of origin, but not as “Black or African American.” In adhering to a nationality-based/country of origin-based definition of detailed minimum categories, OMB, the U.S. Census Bureau, and other federal agencies would reinforce the status quo invisibility of Indo-Caribbeans.
- In a similar vein, there is a considerable number of Chinese Caribbeans and East Asian Latin Americans (Chinese, Japanese, Korean, and Filipino diasporic communities in Peru, Brazil, Mexico, etc.) who have immigrated to the U.S. or who were born in the U.S. The use of nationality-based/national origin-based detailed minimum categories under “Black or African American” and “Hispanic or Latino” in the “Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories” also perpetuates the systemic erasure of these individuals and prevents them from fully self-identifying with their national origin and immigration history.

- **CACF strongly recommends community-driven surveys and testing of alternative configurations that center inclusion and are not nationality-based/country of origin-based, all in partnership with Asian-serving CBOs in NYC.** We encourage the OMB to invest in focus group discussions and survey opportunities with CACF and our 80-member-strong coalition of Asian-serving CBOs in NYC and NYS. It is crucial for the OMB to understand how different Asian immigrant groups, Asians across age groups and education levels, and native-born Asian Americans respond to these question stem options during the form development process.
- **CACF strongly recommends the inclusion of additional information on how subgroups are categorized/which groups are included within each minimum category.** Member organizations have shared that when some members of South Asian, Southeast Asian, and Central Asian groups fill out demographic forms, they may assume that the group with which they self-identify is not “Asian” given popular misconceptions of “Asian” as solely “East Asian” in American society. They may then mark “Some Other Race” erroneously. In order to help respondents better understand how the minimum and detailed minimum categories relates to themselves, we recommend that the final federal race and ethnicity standards include a requirement that any race and ethnicity form include a list of detailed minimum groups within each minimum category, and within “Asian,” include the regional groupings (“East Asian,” “South Asian,” “Southeast Asian,” “Central Asian,” etc.) and subgroups within each regional group. This way, respondents can reference the OMB’s official classifications to best understand how to self-identify within the context of the eventual form’s design. These lists can be included in an appendix at the end of the form, but at least referenced where the specific race and ethnicity questions are located.

*3c. Some Federal information collections are able to use open-ended write-in fields to collect detailed racial and ethnic responses, while some collections must use a residual closed ended category (e.g., “Another Asian Group”). What are the impacts of using a closed-ended category without collecting further detail through open-ended written responses?*

- **CACF strongly recommends using open-ended write-in fields and for the final race and ethnicity standards to prioritize open-ended write-in fields in order to maximize opportunities for self-identification.**
- **CACF does not support the use of “Another Asian Group” as a possible selection or tabulation option as its use completely erases the distinct self-identifications of individuals from smaller, less represented Asian groups.** These are the groups for whom government collection and reporting of disaggregated race and ethnicity data is a critical priority of existential importance given the fundamental role that data plays in policymaking at the federal, state, and local levels. Continued use of “Another Asian Group” or its variants that group smaller Asian ethnic groups together as an aggregate would only



discourage individuals from such groups from self-identification, and further marginalize already marginalized communities.

- **CACF strongly encourages that the final race and ethnicity standards include “Not Listed” as the language used instead of “Other,” “Other Race,” or “Some Other Race”** as recommended by the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).

*3d. What should agencies consider when weighing the benefits and burdens of collecting or providing more granular data than the minimum categories?*

- As aforementioned, over the last decade, New York City’s Asian populations overall have driven the city’s population growth. The city is also growing increasingly multiethnic as more people self-report more than one ethnicity. With these trends in mind, how can agencies continue to make policy decisions and allocate resources solely based on aggregate data that has become less reliable and less accurate in assessing needs between and within racial/ethnic subgroups. And as mentioned earlier, during the height of the Covid-19 pandemic, NYC’s reliance on aggregate data on Asians prevented agencies from understanding that marginalized Asian populations were arguably most at risk and from mobilizing resources swiftly toward protecting these vulnerable populations at the cost of many lives. Collecting granular, disaggregated data on Asians is the first step in improving the livelihoods of marginalized Asian communities and can even save lives. Disaggregated data would also be immensely helpful for communities and community advocates themselves in arming them with advocacy tools to quantify and justify their needs in policymaking. Such data would also be instrumental in dispelling pernicious myths of Asians as model minorities who do not struggle economically and socially in American society, particularly in the media and among the public.

*3e. Is it appropriate for agencies to collect detailed data even though those data may not be published or may require combining multiple years of data due to small sample sizes?*

- **CACF urges transparency in the data collection and reporting process and that all agencies should adhere to a standard of full transparency.** For far too long, Asian communities have been marginalized and erased because government agencies either did not collect or did not publicly report data collected on Asian ethnic groups, resulting in the lack of recognition of our communities’ needs and insufficient resources and community-driven policymaking. We must right this historic wrong. **CACF calls on the final race and ethnicity standards to require data release, reporting, and transparency without any loopholes for agencies to avoid data publication.**

*3f. What guidance should be included in SPD 15 or elsewhere to help agencies identify different collection and tabulation options for more disaggregated data than the minimum categories? Should the standards establish a preferred approach to collecting additional*

*detail within the minimum categories, or encourage agencies to collect additional information while granting flexibility as to the kind of information and level of detail?*

- **For reporting standards for data on Asians, please include language that mandates regional group aggregation (“East Asian,” “South Asian,” “Southeast Asian,” “Central Asian,” and “Transnational”) in addition to the collection and reporting of detailed minimum categories in the final guidance.** Our member organizations have expressed that while the aggregate “Asian” data is not the most useful data point to collect and report on, the regional subgroup data would actually serve as a useful approximation of trends among Asian populations. Please note that the regional subgroup data collection and reporting would *not* replace or be used in lieu of the requirement for the collection and reporting of detailed minimum categories.

*3g. Is the current “default” structure of the recommendation appropriate? Should SPD–15 pursue a more voluntary approach to the collection of disaggregated data, as opposed to having a default of collecting such data unless certain conditions are met?*

- **CACF does *not* support the “voluntary approach to the collection of disaggregated data,” and strongly emphasizes the need to set a mandatory collection standard of detailed minimum categories across all federal agencies.** A voluntary approach to disaggregated data collection could lead to the same problems we have faced historically and today in federal, state, and local agencies opting against investing in further effort to collect information on detailed minimum categories, a status quo that would further perpetuate ignorance of marginalized communities’s pressing needs and endanger people’s lives. There should be a standard requirement for the collection and reporting of detailed minimum categories along with language that incentivizes or further requires agencies to localize standards to specific geographies; language could focus on the need to include detailed minimum categories for populations particularly prevalent in localities or specific geographic areas.

*3h. What techniques are recommended for collecting or providing detailed race and ethnicity data for categories with smaller population sizes within the U.S.?*

- On this matter, CACF supports the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).

#### **4. Update Terminology in SPD 15.**

- **CACF supports the initial proposal to replace “the Far East” with “East Asia.”**
- **CACF supports the discontinued use of “majority,” but recognizes that the use of “minority” may still be necessary to refer to certain Asian ethnic subgroups that experience minoritization and discrimination within another ethnic subgroup or within a country of origin-based group; for instance, individuals who self-identify as “Sikh,” “Hmong,” “Uyghur,” etc. On this**

matter, CACF supports the Public Comment from the Sikh American Legal Defense and Education Fund (SALDEF).

- **CACF strongly encourages the final race and ethnicity standards to adopt a more inclusive definition of “Asian” to better reflect individuals and groups that have consistently been sidelined and rendered invisible in existing standards for “Asians.”**
  - The language in the existing standards reads as follows:
    - Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, India, China, the Philippine Islands, Japan, Korea, or Vietnam.
    - It includes people who indicate their race as Asian Indian, Chinese, Filipino, Korean, Japanese, Vietnamese, and Other Asian, or provide other detailed Asian responses such as Pakistani, Cambodian, Hmong, Thai, Bengali, Mien, etc.
  - The language should be changed to read as follows:
    - **Asian. A person having origins or ancestry in any of the peoples or places of East Asia, Southeast Asia, South Asia, or Central Asia. It includes Asian nationality-based self-identification like Asian Indian, Pakistani, Chinese, Filipino, Korean, Japanese, Vietnamese, Indonesian, or Uzbek.**
    - **It also includes transnational and diasporic populations like Indo-Caribbeans, Punjabis, Bengalis, Bengalis, Mien, and Tibetans.**
    - **It also includes adoptees whose birth parent(s) and/or adoptive parent(s) have origins to aforementioned Asian regions, groups, or communities.**
    - **If the group(s) with which you self-identify is/are not explicitly included in this definition or not listed as an example, please write in how you self-identify and provide as much information as you are willing.**
  - CACF strongly encourages replacing “the Indian subcontinent” with “South Asia” that would be consistent with the usage of “East Asia” and would remove any perceived remnants of colonialism in the usage of “Indian subcontinent.” Some individuals also prefer regional terminology that is not associated with “India” or the “Indian government” given either historical and ongoing sociopolitical and religious discrimination from such entities and/or a lack of connection with “India” or “Indian.”
  - CACF strongly encourages using consistent terminology across the regional subgroups alongside “East Asia” and “South Asia” like “Southeast Asia” and “Central Asia.”

- CACF strongly recommends including language that explicitly includes transnational and diasporic communities like Indo-Caribbeans, Punjabis, Bengalis, and Tibetans among others.
- **CACF strongly recommends using “Nepali” instead of “Nepalese” as “Nepali” is the preferred term for self-identification among Nepalis in the U.S.** Adhikaar, a CACF member organization that primarily serves Nepali New Yorkers [defines](#) “Nepali” as the “Nepali-speaking community” with “descendants from Nepal, Bhutan, India, Myanmar, and Tibet.” The term “Nepalese” evokes British colonial rule and imperialism with which many Nepalis find challenging to self-identify and as such, Nepalis would prefer retiring “Nepalese” entirely. Many Nepalis prefer using “Nepalis” due to the Nepali language serving as the unifying root of a shared self-identification. Adhikaar previously engaged the U.S. Census Bureau on the Nepali community’s wishes for the term “Nepali” to be used in place of “Nepalese,” but the 2020 Census still used “Nepalese” as evidenced by the 2020 Census National Redistricting Data Summary File’s use of “Nepalese.” CACF urges OMB, the U.S. Census Bureau, and other federal agencies to meet with Nepali CBOs like Adhikaar in order to make the change from “Nepali” to “Nepalese” in time for the 2030 Census.
- **CACF strongly recommends including language that explicitly includes self-identification for transracial and transnational adoptees for whom existing race and ethnicity standards leave them feeling excluded and frustrated.** As aforementioned, our member organizations that work with adopted youth have shared the experience of filling out race and ethnicity demographic forms currently unnecessarily raises stressful and painful feelings linked to a lack of belonging; individuals adopted from an Asian country or from an Asian birth parent may interpret the intent behind race and ethnicity questions as focused on capturing “ancestry” information, which may be stressful if the individuals do not have relevant information on their birth parents’ ancestry. Moreover, transracial and transnational adoptees from Asia or from an Asian birth parent often face the dilemma as to whether they should list their own race and ethnicity as aligned with those of their adoptive parents and family, as aligned with those of their Asian birth parent, or both. CACF recommends clarifying the “Asian” definition to be inclusive of transracial and transnational adoptees to encourage such individuals to self-identify as “Asian.”

4a. *What term (such as “transnational”) should be used to describe people who identify with groups that cross national borders (e.g., “Bantu,” “Hmong,” or “Roma”)?*

- **CACF strongly supports the use of “transnational and/or diasporic” as the terminology used to describe individuals who self-identify with groups that are spread throughout more than one country.** It is critically important for OMB to provide ample examples of transnational groups within each minimum category. For instance, under “Asian,” there should be representative examples of transnational and diasporic groups provided for each regional group (East

Asian, South Asian, Southeast Asian, Central Asian) and for groups that fall outside those established regional groupings (Indo-Caribbean). The final race and ethnicity standards should also include a definition of “transnational” and “diasporic” and a requirement that such definitions be included in any federal form that uses such terminology.

- **Indo-Caribbeans** (see Appendix’s “Further Contextualization of Indo-Caribbean” for more information)
  - The Indo-Caribbean community is a diverse population that has been an integral part of life in America since the 1800s, but has struggled to gain the recognition and access to services they need. Beginning in 1838, after the abolition of slavery, Indo-Caribbean people were taken by the British from South Asia and brought to Guyana, Trinidad, Jamaica to work as indentured laborers on sugar plantations and were coerced into a new exploitative system of bonded labor to replace slavery in the Caribbean (2022 SAIC Community Council Briefing). In the 1970s and 1980s, Indo-Caribbean people migrated to New York City fleeing social, political and economic turmoil in home countries. They created vibrant communities in parts of South Queens (Richmond Hill/Ozone Park/Jamaica), the Bronx (Castle Hill/Wakefield/Grand Concourse) and Brooklyn (East New York). Now, New York City.
  - For far too long, government data collection has been far too broad to accurately capture the nuances and complexities of Indo-Caribbean New Yorkers. Where demographic forms only explicitly provide minimum categories based on aggregate race categories, Indo-Caribbeans do not see themselves; they cannot solely self-identify as “Asian” or “Black.” Oftentimes, individuals select “Other” and may utilize a write-in response to indicate more accurate self-identification as “Indo-Caribbean,” “Indo-Jamaican,” “Indo-Guyanese,” etc.
  - When detailed minimum categories are provided, they are generally nationality-based and present the problem of race essentialism; for instance, including “Guyanese” as a subgroup of “Black” gives the impression that all Guyanese-identifying individuals are solely Black. This directly contradicts the reality of Indo-Caribbeans hailing from Guyana, Trinidad, Jamaica, Suriname, and other parts of the Caribbean, and inherently erases these communities, individuals, cultures, and histories. The current “Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories” commits this grave error and excludes the Indo-Caribbean community’s Asian roots, rendering all individuals who may self-identify with a country of origin in the Caribbean as “Black.”
  - According to the [2021 NYC Mayor’s Office for Immigrant Affairs \(MOIA\) State of our Immigrant City Report](#), Guyanese are the 4th largest and Trinidadians are the 8th largest immigrant groups in NYC, which make up a significant majority of Indo-Caribbean New Yorkers. Indo-Caribbeans deserve to be accurately counted in federal, state, and local data collection, and the only way to do so is the explicit inclusion of “Indo-Caribbean” under the “Asian” minimum category.



- **CACF, after consultation with our Indo-Caribbean-serving CBOs and advocates, strongly recommends that if the final race and ethnicity standards were to continue using the “Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories,” it should include “Indo-Caribbean” as either a detailed checkbox or as an explicitly listed example of a transnational or diasporic population under the “Asian” minimum category. Individuals who on demographic forms self-identify as “Indo-Caribbean” or “Indo-[name of Caribbean country of origin]” do so to specifically identify with and/or honor their Asian origin.**
- **In addition, CACF strongly recommends that the final race and ethnicity standards should include under the “Black or African American” minimum category an “Afro-Caribbean” detailed minimum category in lieu of a number of Caribbean nationality-based/country of origin-based categories.** This is in line with recommendations made by many respondents from the Black community advocating for changes to the detailed minimum categories under “Black or African American” minimum category during the live Town Halls in March 2023. To continue using Caribbean nationality-based/country of origin-based categories would not only confuse and further marginalize individuals who self-identify with their country of origin like “Jamaican” or “Trinidad,” but who do not self-identify with “Black or African American,” but also lead to deficient and unreliable data collected on Indo-Caribbeans in the U.S.
- Our recommended change toward explicitly listing “Indo-Caribbean” under “Asian” and “Afro-Caribbean” under “Black or African American” would also lead to a more precise count of biracial/multiracial/multiethnic Caribbean respondents who could then more accurately self-identify as both “Indo-Caribbean” and “Afro-Caribbean,” checking both boxes versus getting confused, and assuming they need to write in their Caribbean country of origin under the “Black or African American” minimum category.
- **CACF believes that should any individual change to the “Asian” minimum and detailed categories be prioritized, it should be the explicit inclusion of “Indo-Caribbean” and the corresponding change to “Afro-Caribbean” in the “Black or African American” minimum category.** This is a particularly pressing need within NYC’s Asian communities given the continued disenfranchisement of one of the fastest growing communities. As I write this public comment, the New York Independent Redistricting Commission (NYIRC) has yet again drawn a final map that completely divides this widely recognized community of interest in the Southeast Queens neighborhood of Richmond Hill/South Ozone Park. In December 2022, the NYIRC released a draft map that would have united the vast majority of the Indo-Caribbean community in Southeast Queens, but ultimately, reneged on their promises for a democratic process driven by community and public input, choosing to

revert to the existing maps that divide this already marginalized community. In 2022, the NYC Districting Commission also continued to divide the Indo-Caribbean community into two NYC Council districts. NYC's Indo-Caribbean community mobilized in record numbers to participate in this historic process to advocate for the fair, accurate, and equitable redistricting that they deserve. Despite that, political incumbents and tacit gerrymandering undermined the democratic process upon which community members placed their hopes and efforts. This experience of political forces rejecting the needs and will of this marginalized community underscores the urgent, overdue need for the final federal race and ethnicity standards to explicitly include Indo-Caribbeans.

- In doing so, this long marginalized community will finally receive the official recognition to protect the community's needs not only in future redistricting cycles, but also in NYC and NYS budget negotiations and elections.
- **Armenian Americans**
  - On this matter, CACF strongly supports the Armenian American Action Network's (AAAN) Public Comment on the need to explicitly include "Armenian" as a detailed minimum category under the "MENA" minimum category. AAAN is, as aforementioned, an example of a MENA-serving CBO that joined our coalition due to alignment with CACF's core missions of fighting for inclusion in data via data disaggregation and in budget equity for all marginalized communities.
  - Armenian Americans are among the top 3 largest MENA communities in terms of population size and must have that reflected with an Armenian checkbox under the MENA category on the new census form; Armenian Americans overwhelmingly support Census classification that includes their community.
  - Armenians are a transnational group in the MENA region and like other populations must be counted as a transnational group. Thus, they must be represented in a detailed minimum category checkbox in order to not be subsumed or erased.
  - Armenian Americans alongside all MENA Americans are a sizable and important community that currently are not counted by the United States and must no longer be excluded.

*1. If a combined race and ethnicity question is implemented, what term should be used for respondents who select more than one category? For example, is the preferred term "multiracial," "multiethnic," or something else?*

- **CACF strongly recommends more testing of these options, particularly in partnership with Asian-serving CBOs in NYC. We encourage the OMB to**

invest in focus group discussions and survey opportunities with CACF and our 80-member-strong coalition of Asian-serving CBOs in NYC and NYS. It is crucial for the OMB to understand how different Asian immigrant groups, Asians across age groups and education levels, and native-born Asian Americans respond to these question stem options during the development process.

- Regardless of which term the OMB settles on, the OMB should consider a more inclusive write-in response for individuals who self-identify with multiple ethnic groups. As mentioned earlier, the current form design necessitates an individual who may self-identify with multiple ethnic groups to also choose multiple racial/minimum categories in their self-response, which may not be reflective of their preferred self-identification.

*Are these draft definitions: i. Comprehensive in coverage of all racial and ethnic identities within the U.S.? ii. Using equivalent criteria? iii. Reflective of meaningful distinctions? iv. Easy to understand? v. Respectful of how people refer to themselves? Please suggest any alternative language that you feel would improve the definitions.*

*4b. As seen in Figure 2, based on the Working Group's initial proposal, the question stem asks "What is your race or ethnicity?" Do you prefer a different question stem such as: "What is your race and/or ethnicity?", "What is your race/ethnicity?", "How do you identify?", etc.? If so, please explain.*

- **CACF strongly recommends more testing of these question stem options, particularly in partnership with Asian-serving CBOs in NYC. We encourage the OMB to invest in focus group discussions and survey opportunities with CACF and our 80-member-strong coalition of Asian-serving CBOs in NYC and NYS.** It is crucial for the OMB to understand how different Asian immigrant groups, Asians across age groups and education levels, and native-born Asian Americans respond to these question stem options during the development process.

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

*5a. For data providers who collect race and ethnicity data that is then sent to a Federal agency, are there additional guidance needs that have not been addressed in the initial proposals?*

- **On this matter, CACF supports the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH), strongly recommending that the federal race and ethnicity standards provide guidance on language-accessible explanations to the public on the following questions/terminology:**
  - What specifically has changed between the existing race and ethnicity standards and the final race and ethnicity standards?

- Why are these changes happening? Why now?
- What is the purpose of the government's race and ethnicity data collection?
- Definitions of "race," "ethnicity," "transnational and diasporic," "transracial and transnational adoptee"
- Methodology behind the explicit inclusion of some groups, but not others
- **CACF strongly recommends that OMB develop clear guidance that not only requires, but incentivizes state and local agencies to collaborate closely with federal agencies in the speedy implementation of the final race and ethnicity standards at the state and local levels.**
- **CACF calls on OMB and federal agencies to recognize the importance of providing all information to the public in all Asian languages.** During the entirety of this Public Comment period from the Federal Register Notice's release in late January until now, there has not been any Asian language material provided on such an important change, which as a result, has prevented significant parts of Asian communities from participating in the process. It makes little sense to seek feedback on race and ethnicity data collection standards from Asian communities and not provide materials on the proposed changes in a culturally responsive manner. OMB should provide guidance establishing a requirement that public-facing materials on race and ethnicity be provided in-language and in a culturally responsive format for all Asian groups.
- **Moreover, CACF strongly recommends that there be a requirement for the U.S. Census and other federal agencies to provide respondents with the ability to respond to their form in their preferred Asian language up to the top 30 spoken Asian languages in the U.S.** In 2020, the U.S. Census [announced](#) that it could offer respondents the ability to provide in-language response in six Asian languages (Mandarin Chinese, Cantonese, Vietnamese, Korean, Tagalog, Japanese), celebrating that "99% of all U.S. households will be able to respond to the census in their language." Unfortunately, that statistic most likely does not hold for Asian communities across the country. So many members of the Asian community are still not English-language-proficient and depend on in-language resources to fully communicate with U.S. agencies. We call on OMB to establish a requirement of federal agencies to provide respondents with fully translated in-language materials; the ability to respond in-language verbally, online, or in paper form; and consistent live in-language support for the top 30 spoken Asian languages. At the same time, there should be guidance that requires a minimum of the top 15 spoken Asian languages at the state and local levels for all three aforementioned response formats.
- **CACF also strongly encourages OMB to establish guidance that incentivizes federal, state, and local agencies to not only implement the final race and ethnicity standards quickly, but to also work directly with CBOs and community-based partners in bridging gaps of trust and**

**understanding with marginalized communities.** Our communities that have for so long been rendered invisible in federal, state, and local race and ethnicity standards and data collection need the final race and ethnicity standards to be implemented as expeditiously as possible in keeping with the ITWG and our communities' shared commitment to inclusion. We must ensure that there is a clear expectation, accountability mechanism, and incentive structure for state and local agencies to prioritize implementation of the final standards in partnership with local community-based organizations that have the bedrock of trust in the communities from whom agencies now would like to collect more granular data.

*5d. How should race and ethnicity be collected when some method other than respondent self-identification is necessary (e.g., by proxy or observation)?*

- **CACF strongly advises against any measurement of race and ethnicity by observation; self-identification should be the only method that is employed to collect race and ethnicity data on any population.** There should never be a situation in which public funds are committed to individuals prescribing race and ethnicity identification to other individuals. On this matter, CACF supports the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).

*5e. What guidance should be provided for the collection and reporting of race and ethnicity data in situations where self-identification is unavailable?*

- **CACF cautions against using alternatives to self-identification as much as possible. CACF strongly recommends that guidance in such instances require agencies to contact local CBOs to develop a community-driven approach that may either allow for self-identification or a community-endorsed alternative to self-identification.** Agencies need to seek out local and community expertise where it already exists and fund such relationship-building activities and projects with CBOs.

## **6. Comments On Any Additional Topics and Future Research.**

*6a. SPD 15 does not dictate the order in which the minimum categories should be displayed on Federal information collections. Agencies generally order alphabetically or by population size; however, both approaches have received criticism. What order, alphabetical or by population size, do you prefer and why? Or what alternative approach would you recommend?*

- **CACF strongly recommends that final race and ethnicity standards display minimum categories in alphabetical order in order to dispel any potential misinformed notions of favoritism, bias, or hierarchy of agency intent.** On this matter, CACF supports the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).
- **CACF strongly advises the OMB to include language that requires agencies to separate data collected on “Asians” and “Native Hawaiian Pacific**



**Islanders” in order to prevent systemic erasure of NHPI communities’ distinct needs across issue areas.** If deemed useful, end users like advocates and community groups could still combine data on “Asians” and “NHPI” together for their own purposes. On this matter, CACF supports the Public Comment from the Section for Health Equity at NYU Langone Health and the Center for the Study of Asian American Health (CSAAH).

*6d. The proposals in this FRN represent the Working Group’s initial suggestions for revisions to SPD 15 to improve the accuracy and usefulness of Federal race and ethnicity data. The Working Group and OMB welcome comments and suggestions on any other ways that SPD 15 could be revised to produce more accurate and useful race and ethnicity data.*

- **CACF urges more community-based and community-driven research and testing on the following populations:**
  - **Indo-Caribbean New Yorkers**
    - We urge the OMB to devote much needed resources toward community-based research on the Indo-Caribbean community in New York City to understand the nuances of self-identification as well as the unique history of one of the city’s fastest growing populations. OMB should evaluate self-identification rates employing different terms like “Indo-Caribbean” and “West Indian” and assess the rates of responses for both “Asian” and “Black” and “Asian” and “Other”/“Not Listed.”
  - **MENA New Yorkers**
  - **Chinese New Yorkers**
    - We urge OMB to develop projects with NYC’s Chinese-serving CBOs to research self-identification trends on the increasingly diverse Chinese population given the many waves of immigration, varied immigration journeys by geography, educational background, English proficiency, etc. As more subgroups from the Chinese diaspora and mainland China immigrate to the U.S., the need to test and determine whether more granular terms like “Han Chinese,” “Fujianese,” “Cantonese,” “Hong Kongese,” etc. are preferred will rise.
  - **Asian transnational, diasporic, and refugee populations in NYC metropolitan areas and in upstate New York** (Tibetan, Burmese, Uyghur, Sri Lankan among others)
  - **Asian Americans who are descendants of Asians who immigrated to the U.S. before 1965**
    - Given the many waves of immigration across Asian ethnic groups, it is important for OMB and other federal agencies to develop a better understanding of the nuances in self-identification of these

groups segmented by nativity, immigration wave, and generation. As participants in the March 2023 Town Halls mentioned, the unique self-identification of Asian Americans whose family has lived in the U.S. since before 1965 should not be overlooked when OMB and other federal agencies conduct community-based outreach and research.

- **Multiethnic respondents**
  - CACF urges OMB to invest resources in surveys that will test preferred formats for self-identification for individuals who self-identify with multiple ethnic groups. The need for this testing will grow more salient as NYC's Asian ethnic groups experience increasing rates of not only intermarriage or childbearing with other Asian or non-Asian ethnic groups, but also of cohabiting with other Asian or non-Asian ethnic groups.
- **Asian transracial and transnational adoptees**
  - CACF urges OMB to invest resources in surveys that will test preferred formats for self-identification for individuals are transracial or transnational adoptees. Through pursuing community-based testing of form design, terminology, and language for Asian transracial and transnational adoptees, OMB and other federal agencies can determine how best to make the federal race and ethnicity standards inclusive of such adoptees.
- **Subgroup classification, coding, and roll-up** (See Figures 3 and 4, Appendix)
  - In this section, CACF provides recommendations regarding concerns related to the 2020 Census National Redistricting Data Summary File's current coding of subgroup populations. Currently, some of the coding practices that place one group under another group do not align with the general trends of self-identification within the communities we serve.
  - South Asian subgroups
    - **Remove "Punjabi" and "Bengali" from "Asian Indian" and create a distinct code for "Punjabi."** Punjabis are a transnational population whose historical origins lie in the Punjab region in the Indian subcontinent. Coding "Punjabi" under "Asian Indian" runs counter to this basic historical fact as well as to the reality that the vast majority of Punjabis are from the state of Pakistan (over 100 million). Bengalis are a South Asian transnational population that currently has a separate code on par with nationality-based groups like "Bangladeshi" or "Pakistani." Under a similar vein, "Punjabi" should similarly have its own distinct code as "Bengali" does.
  - East Asian subgroups

- **Remove “Tibetan” and “Hong Kong” as subgroups under “Chinese.”** It is concerning that “Tibetan” and “Hong Kong” groups are coded as subgroups of “Chinese” given that most self-identifying Tibetans and Hong Kongese would reject being labeled “Chinese” in a similar fashion to individuals self-identifying as “Taiwanese” who reject “Chinese.” Longstanding political oppression from the Chinese government has contributed to a considerable number of Tibetans and Hong Kongese who have left mainland China explicitly rejecting self-identification as Chinese. Moreover, many Tibetans and Hong Kongese were displaced or are descendants of displaced people, and thus, have no relation to China or Chinese identity. In the spirit of the the OMB’s second principle to “respect individuals” and “individual dignity,” CACF urges the OMB to remove “Tibetan” and “Hong Kong” from subgroup coding under “Chinese” and consider inclusion under a “Transnational Groups” category under “Asian.”
- **Consider the inclusion of other Chinese regional subgroup codes or detailed minimum categories.** In New York City alone, in the last decade, the Chinese population experienced an [18% increase](#) and the largest raw population growth of any other Asian community with an increase of almost 100,000 people. The rise in the Chinese population has contributed to immense changes within the Chinese community; for instance, recent waves of immigration from Fujianese Chinese has resulted in Sunset Park, Brooklyn becoming the city’s largest Fujianese Chinese community. Bensonhurst and Sheepshead Bay are together now predominantly Cantonese and Taishanese Chinese. As such, the OMB should consider including subgroups of “Cantonese,” “Fujianese,” “Taishanese,” and other Chinese regional subgroups to best reflect significant differences emerging within the Chinese community.

## **Summary of CACF’s Support, Concerns, and Recommendations**

### **CACF Support for specific initial proposals**

CACF supports the following initial proposals:

- **Initial Proposal 1:** Collect race and ethnicity information in one combined question.
- **Initial Proposal 2:** Add “Middle Eastern and North African” (MENA) as a new minimum category.

- **Initial Proposal 3:** Require the collection of detailed race and ethnicity categories by default.

### CACF Concerns about the initial proposals

Based on feedback from our member organizations, we are deeply concerned about the initial proposals in regards to:

- Lack of inclusion of:
  - Transnational and diasporic communities
    - Indo-Caribbeans in particular
  - Transracial and transnational adoptees
  - Multiethnic self-identification within “Asian” as well as across other minimum categories
- Form design
  - **The decision to only provide six detailed minimum categories in the form of checkboxes under each minimum category is not only confusing for respondents, but also harmful in erasing entire communities.**
  - **The explicit inclusion of detailed minimum groups by population size is not inclusive of many groups that are considered Asian, many of which are the very groups that government data collection has consistently neglected and that urgently need to be seen and recognized in government data collection.**
  - **The justification behind explicitly including some detailed minimum categories as checkboxes and others as examples of groups in the write-in section and not others is not provided and thus, may lead to confusion and questioning of the motivations behind the question.**
  - **[On write-in response] The write-in response opportunities provided in the initial proposals are not sufficient to encourage respondents to fully self-identify.**
  - **[On transnational and diasporic populations] The example is *not* inclusive of transnational and diasporic populations as it currently relies almost entirely on nationality-based/country of origin-based standards for developing detailed minimum categories and does not explicitly include transnational and diasporic populations that are consistently neglected in government data collection.**
  - **[On multiethnic self-identification] There currently exists no clear way for a person to indicate self-identification with more than one detailed minimum category, especially if the two or more detailed minimum categories are not explicitly included within the same aggregate minimum category, especially for groups that do not have a detailed checkbox.**

- [Transracial and transnational adoptees] The example is *not* inclusive of transracial and transnational adoptees with the lack of explicit instructions that indicate how such individuals should consider self-identification.

### **Summary of Recommendations for Further Changes and Prioritization**

- **Recommendations on Language and Specific Terminology**
  - Use a definition of “Asian” that is not reliant on nationality-based/country of origin-based categories and is explicitly inclusive of transnational and diasporic groups, transracial and transnational adoptees, and multiethnic self-identification.
  - Provide explicit explanations on the motivations for race and ethnicity data collection and definitions of “race” and “ethnicity,”
  - Use “Nepali,” not “Nepalese.”
- **Recommendations on Form Design** (Figures 1 and 2, Appendix)
  - Maximize respondents’ ability to provide a write-in response so that respondents can provide information on how they self-identify on their own terms without the potential problems posed by the current form design. Provide space more than a single line under each minimum category in the initial proposals or 16-character boxes as in the 2020 Census Questionnaire. Provide another space for write-in response unaffiliated with any minimum category.
  - Avoid solely providing checkboxes based on nationality-based detailed minimum categories like the initial proposal currently does.
  - Include a more exhaustive list of examples of detailed minimum categories under each minimum category that includes transnational groups and not solely nationality-based detailed minimum categories. Include a list of multiple examples of Asian transnational and diasporic groups from each region within Asia (East Asia, South Asia, and Southeast Asia).
    - Prioritize the inclusion of “Indo-Caribbean” under the “Asian” minimum category and the use of “Afro-Caribbean” under the “Black and African American” minimum category in place of the Caribbean country of origin-based categories.
  - Invest in community-based research and testing of terminology and form design.
- **Recommendations for Implementation**
  - Provide clear guidance, resources, and incentives for state-level and local-level implementation of the final revised race and ethnicity standards.



- Engage with state and local community-based organizations to develop joint collaboration strategy for community-based public education and implementation.
- Provide ample resources to community-based organizations to collaborate with the federal, state, and local rollout of the eventual race and ethnicity standards.
- Invest in community-informed, culturally responsive, and language accessible resources for community education.
  - Hire community-based translators and interpreters that correspond with communities' needs.
- Increase the number of Asian languages in which respondents can use to respond to the U.S. Census and other federal agency forms in their preferred Asian language to the top 30 by population

Thank you so much for your time and consideration. We would welcome the opportunity to meet with you, discuss our recommendations and concerns, and collaborate on community-based projects to ensure that the final race and ethnicity standards meet the needs of marginalized Asian communities.

We look forward to working with you,

**Coalition for Asian American Children and Families (CACF)**

**CACF Member Organization Sign-Ons:**

**A Place for Kids**

**Academy of Medical and Public Health Services, Inc. (AMPHS)**

**Access Future**

**Adhikaar for Human Rights & Social Justice**

**Apex for Youth**

**APNA Brooklyn Community Center**

**APICHA Community Health Center**

**Arab American Association of New York (AAANY)**

**Arab-American Family Support Center (AAFSC)**

**Armenian-American Action Network**

**Asian American Arts Alliance (A4)**

**Asian Americans for Equality (AAFE)**

**Asian American/Asian Research Institute- CUNY (AAARI)**

**Association for Human Development, Inc.**

**Autism Society Habilitation Organization (ASHO)**

Bangladeshi American Community Development and Youth Services (BACDYS)  
Brooklyn Raga Massive  
Committee Against Anti-Asian Violence (CAA AV)  
Caribbean Equality Project (CEP)  
Center for All Abilities  
Center for the Integration and Advancement of New Americans, Inc. (CIANA)  
Chhaya CDC  
Chinatown YMCA  
Chinese-American Family Alliance for Mental Health (CAFAMH)  
Chinese-American Planning Council (CPC)  
Chinese American Social Services Center, Inc. (CASS)  
Chinese Progressive Association (CPA)  
Chinatown Manpower Project (CMP)  
Community Inclusion and Development Alliance (CIDA)  
Council of Peoples Organization (COPO)  
Damayan Migrant Workers Association  
Empowerment Skills International  
Filipino American Human Services, Inc. (FAHSI)  
Friends of the Philippines Society USA Inc.  
Garden of Hope  
General Human Outreach: Empower Independence (GHO)  
Glow Community Center  
Grand Street Settlement  
Hamilton-Madison House (HMH)  
Henry Street Settlement  
Homecrest Community Services, Inc.  
Immigrant Health & Cancer Disparities Service, Memorial Sloan Kettering Carver Center  
Immigrant Social Services (ISS)  
India Home  
Indo-American Senior Citizen Center of New York, Inc.  
Indochina Sino-American Community Center  
Jahajee Sisters  
Japanese American Association of New York, Inc. (JAANY)  
Japanese American Social Services, Inc. (JASSI)  
J CHEN PROJECT  
Kalusugan Coalition  
Kinding Sindaw Heritage Foundation  
The Korean American Family Service Center (KAFSC)  
Korean Community Services of Metropolitan NY, Inc. (KCSNY)  
Laal NYC  
Magar Association USA Inc.  
Mekong NYC

**Malikah**

**Mind the Gap Initiative**

**MinKwon Center for Community Action**

**Muslim Community Network (MCN)**

**National Federation of Filipino American Associations - NYS Chapter (NaFFAA-NY)**

**Center for the Study of Asian American Health (CSAAH)**

**Project New Yorker**

**Sakhi for South Asian Women**

**Sapna NYC**

**Sikh American Legal Defense and Education Fund Inc. (SALDEF)**

**South Asian Council for Social Services (SACSS)**

**South Asian Health Association and Resource Agency (SAHAARA)**

**South Asian Youth Action (SAYA)**

**Telugu Literary and Cultural Association**

**Turning Point for Women and Families**

**UA3**

**United Chinese Association of Brooklyn (UCAB)**

**United Sikhs**

**University Settlement**

**We Mentor Foundation**

**Womankind**

**Women for Afghan Women**

**Women's Empowerment Coalition of NYC (WECNYC)**

**Woodside on the Move (WOTM)**

**Yemeni American Merchants Association (YAMA)**

**YWCA of Queens**

## Appendix

### **Further Contextualization of “Indo-Caribbean”**

"The term “Indo-Caribbean” is a relatively new term to describe and identify descendants of South Asian indenture in the Caribbean region (Guyana, Trinidad and Tobago, Jamaica, Suriname, Barbados, The Bahamas, Saint Kitts and Nevis, etc.) and its diasporas. Following the abolition of the transatlantic slave trade in the mid- and late-1800s in the Americas, and the Caribbean, the increasingly powerful British empire began to turn to their non-Black colonial subjects to fulfill the missing gap of labor to maintain their projects of conquest, expansion, and wealth and land extraction. In the context of the Caribbean, the British Empire particularly turned to regions we now understand as “India,” “China,” “Indonesia,” and “Malaysia,” among other “Asian” populations.

Indentureship refers to the processes of voluntary and involuntary labor migrations sustained through establishing labor contracts within these communities. These contracts brought vulnerable “Asian” communities to the Caribbean to work for a period of five and up to [14 years](#) on plantations previously inhabited by enslaved Africans. Starkly different from processes of chattel slavery that dehumanized Indigenous African populations through acts of transforming them into proprietary or chattel (understood here as ‘property’), indenture provided Asian laborers with land to own and live on as they were viewed with more humanity than their African counterparts, and Indigenous communities displaced in the region before them (particularly the Taino and Kalingo communities).

In the Caribbean, the term Indo-Caribbean has arrived into popular usage through academic discourse in the region and its diasporas. However, it is essential to note that many Caribbean populations based in the Global South often opt to not use this term in favor of its predecessors, such as “West Indian,” “East Indian,” “Indian,” or “Coolie”(the pejorative term used by the British colonial powers for labeling Asian laborers as “dirty,” “inferior” and “lowly”).

Following the popularization of academic texts such as *Indo-Caribbean Feminist Thought*, edited by Dr. Gabrielle Hosein and Dr. Lisa Outar, “Indo-Caribbean” emerges as an identity term that “draws on Indo-Caribbean diasporic...artifacts, archetypes, myths, and symbols, engagements with embodiment, popular cultural expressions, the sacred and sexual, and intellectual traditions and concepts to articulate...Indian gendered experiences in the Caribbean...across [multiple understanding of] ethnicity, class, gender, sexualities, and nation” (3).

In the US diaspora, “Indo-Caribbean” is also used to speak to community-defined terms that produce local notions of identity, ethnicity, history, and memory. Furthermore, “Indo-Caribbean” is important in the diaspora because it allows for building collective solidarity, political power,

and electoral representation. Thus, the term “Indo-Caribbean” works to represent Caribbean immigrants and Caribbean-American identities that cannot be contained within universal categories of “Indian,” “Asian,” or “South Asian” that were assigned to us by outside forces and history. Instead, using the term “Indo-Caribbean” allows our communities to center political language that holds distinct linguistic expressions of their identities that speak to their lived realities and ways of life (including Creole languages they speak). This term is particularly important for Indo-Caribbean communities who largely live in states such as New York, New Jersey, Connecticut, Florida, Virginia, Georgia, California, Minnesota, Missouri, and Texas.”

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**Figure 1.** SPD 15’s Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories

**What is your race or ethnicity?**  
 Select all that apply **AND** enter additional details in the spaces below.  
 Note, you may report more than one group.

**WHITE** – Provide details below.

German       Irish       English  
 Italian       Polish       French  
 Enter, for example, Scottish, Norwegian, Dutch, etc.

**HISPANIC OR LATINO** – Provide details below.

Mexican or Mexican American     Puerto Rican     Cuban  
 Salvadoran       Dominican       Colombian  
 Enter, for example, Guatemalan, Spaniard, Ecuadorian, etc.

**BLACK OR AFRICAN AMERICAN** – Provide details below.

African American     Jamaican       Haitian  
 Nigerian       Ethiopian       Somali  
 Enter, for example, Ghanaian, South African, Barbadian, etc.

**ASIAN** – Provide details below.

Chinese       Filipino       Asian Indian  
 Vietnamese     Korean       Japanese  
 Enter, for example, Pakistani, Cambodian, Hmong, etc.

**AMERICAN INDIAN OR ALASKA NATIVE** – Enter, for example, Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat Tribal Government, Tlingit, etc.

**MIDDLE EASTERN OR NORTH AFRICAN** – Provide details below.

Lebanese       Iranian       Egyptian  
 Syrian       Moroccan       Israeli  
 Enter, for example, Algerian, Iraqi, Kurdish, etc.

**NATIVE HAWAIIAN OR PACIFIC ISLANDER** – Provide details below.

Native Hawaiian     Samoan       Chamorro  
 Tongan       Fijian       Marshallese  
 Enter, for example, Palauan, Tahitian, Chuukese, etc.

**Figure 2.** 2020 Census Questionnaire: Asian and NHPI Detailed Minimum Categories in checkboxes and as examples alongside each other with write-in response.

<input type="checkbox"/> Chinese	<input type="checkbox"/> Vietnamese	<input type="checkbox"/> Native Hawaiian
<input type="checkbox"/> Filipino	<input type="checkbox"/> Korean	<input type="checkbox"/> Samoan
<input type="checkbox"/> Asian Indian	<input type="checkbox"/> Japanese	<input type="checkbox"/> Chamorro
<input type="checkbox"/> Other Asian – <i>Print, for example, Pakistani, Cambodian, Hmong, etc.</i> ↴		<input type="checkbox"/> Other Pacific Islander – <i>Print, for example, Tongan, Fijian, Marshallese, etc.</i> ↴

**Figure 3.** [2020 Census National Redistricting Data Summary File](#): The existing standards' coding of South Asian subgroups/detailed minimum categories.

<b>SOUTH ASIAN</b>	<b>4200-4399</b>
<b>South Asian</b>	<b>4200-4209</b>
South Asian	4200
<b>Asian Indian</b>	<b>4220-4239</b>
Asian Indian (Detailed Checkbox)	4220
Asian Indian	4221
Bengali	4223
Punjabi	4224
<b>Bangladeshi</b>	<b>4240-4259</b>
Bangladeshi	4240
<b>Bhutanese</b>	<b>4260-4269</b>
Bhutanese	4260
<b>Maldivian</b>	<b>4270-4279</b>
Maldivian	4270
<b>Nepalese</b>	<b>4280-4289</b>
Nepalese	4280
<b>Pakistani</b>	<b>4290-4304</b>
Pakistani	4290
<b>Sikh</b>	<b>4305-4309</b>
Sikh	4305
<b>Sindhi</b>	<b>4310-4319</b>
Sindhi	4310
<b>Sri Lankan</b>	<b>4320-4329</b>
Sri Lankan	4320

**Figure 4.** [2020 Census National Redistricting Data Summary File](#): The existing standards' coding of East Asian subgroups/detailed minimum categories.

<b>EAST ASIAN</b>	<b>4010-4099</b>
<b>East Asian</b>	<b>4010-4019</b>
East Asian	4010
<b>Chinese</b>	<b>4020-4039</b>
Chinese (Detailed Checkbox)	4020
Chinese	4021
Hakka	4022
Han	4023
Hong Kong	4024
Macanese	4025
Tibetan	4026
<b>Japanese</b>	<b>4040-4049</b>
Japanese (Detailed Checkbox)	4040
Japanese	4041
Okinawan	4042
Iwo Jiman	4043
<b>Korean</b>	<b>4050-4059</b>
Korean (Detailed Checkbox)	4050
Korean	4051
<b>Mongolian</b>	<b>4060-4069</b>
Mongolian	4060
<b>Taiwanese</b>	<b>4070-4079</b>
Taiwanese	4070
<b>Hmong</b>	<b>4080-4089</b>
Hmong	4080