

# Preparing for the Big Shift:

## Changes to Federal Race & Ethnicity Data Standards

*Featuring: Karthick Ramakrishnan and Akil Vohra*

July 18, 2024

[www.statesforthefuture.org](http://www.statesforthefuture.org)



**STATES FOR  
THE FUTURE**

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name, organization &  
state in the chat.*

# Key takeaways:

## Preparing for the Big Shift - *July 18, 2024*

- **Disaggregated data is a must for understanding the issues:** Aggregated data can obscure the experiences of subpopulations and hide the need for policy change, while disaggregated data can reveal the impact of current policy or social factors. For example, it has been widely reported that Asian American populations experienced less COVID deaths per capita compared to other ethnic groups in the US. However, data by disaggregated by ethnicity shows that some AANHPI populations were disproportionately impacted by the virus.
- **Data alone isn't enough:** AAPI Data's three pillars are Data, Narrative, and Action. Narrative is what makes the data feel "real" and helps move the policy process forward to "Action." AAPI Data shares the narratives of its community through its recommendations and press-ready reports.
- **Engage curiosity to inspire action:** AAPI Data presents data to stakeholders through traditional means such as reports and charts, but will also use playful methods such as quizzes to grab legislators' attention. This inspires policy makers to learn more, and ultimately understand the need for change.
- **Be part of the change to be well positioned for future work:** If you can be part of the change at the state level, you can advocate for the data your organization needs and build relationships with key stakeholders for other projects. AAPI Data has campaigned for many years for the need for disaggregated data, and are starting to see change in data collection standards through Statistical Policy Directive No. 15. The result will be huge swaths of data that was previously unavailable, further enabling AAPI Data's work.



# STATES FOR THE FUTURE

*A Data to Policy Network*

**States for the Future** is a **learning community** bringing state policy professionals together around **data**, **research**, and **action**.

Learn more & explore our data platform: [www.statesforthefuture.org](http://www.statesforthefuture.org)

## Our Shared Values:



- We know that **good policy is grounded in quality data and research, not ideology.**
- We see the necessity of making data actionable and using it to drive toward **real-world solutions.**
- We believe that states should be guided by **long-term strategic plans** to address the many challenges they face.
- We value the role of tracking and **understanding equity gaps** in developing meaningful solutions.
- We recognize that there are multiple approaches to developing solutions. The **diversity of our organizations and states is a strength** that can be leveraged to achieve shared goals.
- We are committed to **collaborating and sharing best practices** so we can build capacity within our individual organizations and drive innovative policy-making

# Today's speakers:



**AAPI DATA**

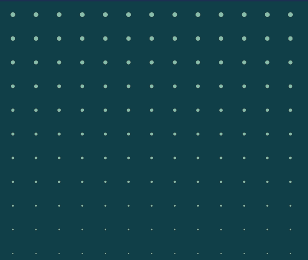
DATA • NARRATIVE • ACTION



Karthick  
Ramakrishnan



Akil Vohra



# Preparing for the Big Shift: Changes to Federal Race & Ethnicity Data Standards

Karthick Ramakrishnan, Executive Director and Founder  
Akil Vohra, Director of Policy

July 18, 2024



**AAPI DATA**  
DATA · NARRATIVE · ACTION



# Who We Are



# AAPI DATA

DATA • NARRATIVE • ACTION

AAPI Data is a research and policy organization producing accurate **data** and supporting community **narratives** that drive **action** toward enduring solutions for Asian American, Native Hawaiian and Pacific Islander (AANHPI) communities.

We aspire to transform public and private systems to ensure that all AANHPI communities are recognized, valued, and prioritized.

# Our Strategic Framework



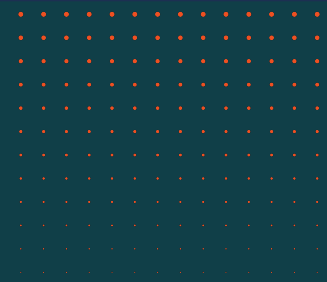
**D**ata & Insights  
**N**arrative Change  
**A**ction & Impact



**Data is critical to ensure that  
our communities are**

- **Recognized**
- Respected
- **Prioritized**

**Or, to put it more bluntly...**  
**data means dollars**



# Progress on Survey Data

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# Monthly surveys with Associated Press



**A A P I**  
**D A T A**

**AP** ✱ **NORC**

## **HISTORIC SURVEY PARTNERSHIP**

*The AAPI Data/AP-NORC survey is  
the first monthly survey of Asian American,  
Native Hawaiian and Pacific Islander  
(AANHPI) communities.*

**MORE INFO:** [aapidata.com/blog/monthly-survey](https://aapidata.com/blog/monthly-survey)



yahoo/news

Search the web

AP

# Nearly 8 in 10 AAPI adults in the US think abortion should be legal, an AP-NORC poll finds

GRAHAM LEE BREWER and AMELIA THOMSON-DEVEAUX  
Updated March 21, 2024 · 5 min read

135



Boston Herald

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NEWS · NATION

# Asian Americans and Pacific Islanders in US more likely to believe in climate change: AP-NORC poll



USNews NEWS

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# Most AAPI Adults Think the History of Racism Should Be Taught in Schools, an AP-NORC Poll Finds

About 7 in 10 AAPI adults approve of K-12 public schools teaching about the history of slavery, racism and segregation

By Associated Press | May 29, 2024

Save

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AP

WORLD U.S. ELECTION 2024 POLITICS SPORTS ENTERTAINMENT BUSINESS SCIENCE FACT CHECK ODDITIES ...

Trump hush money Justin Timberlake arrested Israel-Hamas war

EVEN WHEN THE NEWS IS FREE, JOURNALISM IS NOT. SUPPORT INDEPENDENT, FACT-BASED JOURNALISM. DON.

U.S. NEWS

# 1 in 3 US Asians and Pacific Islanders faced racial abuse this year, AP-NORC/AAPI Data poll shows



# AAPI Voter State Fact Sheets

## DEMOGRAPHICS

## AAPI Voter State Fact Sheets

AAPI Data has partnered with Asian & Pacific  
Islander American Vote (APIAVote) to create state-...



### 2024 AAPI Voter Demographics | WISCONSIN



#### COUNTIES WITH HIGHEST AAPI POPULATIONS

	AAPI Share of County Pop	Size of AAPI Population	AAPI Eligible Voter Share of County	Number of AAPI Eligible Voters
Milwaukee County	4.6%	43,295	6.5%	20,989
Dane County	6.0%	33,548	7.9%	16,400
Waukesha County	3.9%	15,885	5.1%	7,717
Brown County	3.2%	8,534	4.3%	4,107
Marathon County	5.6%	7,711	7.4%	4,362

#### LARGEST ASIAN AMERICAN ETHNIC GROUPS IN WISCONSIN

Hmong (58,176)	Asian Indian (17,264)	Chinese, except Taiwanese (32,058)	Filipino (22,813)	Korean (12,980)	Japanese (10,594)
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#### LARGEST NHPI ETHNIC GROUPS IN WISCONSIN

Native Hawaiian (2,072)	Chamorro (707)	Samoan (704)
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#PowerInNumbers

APIAVOTE  
AAPI DATA  
ASIAN & PACIFIC ISLANDER AMERICAN VOTE

### 2024 AAPI Voter Demographics | HAWAII



#### COUNTIES WITH HIGHEST AAPI POPULATIONS

	AAPI Share of County Pop	Size of AAPI Population	AAPI Eligible Voter Share of County	Number of AAPI Eligible Voters
Honolulu County	48.2%	487,316	66.6%	384,079
Hawaii County	30.1%	60,808	41.1%	49,911
Mauai County	35.1%	57,818	49.1%	43,444
Kauai County	35.8%	26,327	49.7%	20,319

#### LARGEST ASIAN AMERICAN ETHNIC GROUPS IN HAWAII

Filipino (568,734)	Japanese (321,528)	Chinese, except Taiwanese (230,416)	Korean (92,810)	Vietnamese (77,032)	Okinawan (10,403)
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#### LARGEST NHPI ETHNIC GROUPS IN HAWAII

Native Hawaiian (314,128)	Samoan (36,473)	Other Micronesian (18,534)
------------------------------	--------------------	-------------------------------

#PowerInNumbers

APIAVOTE  
AAPI DATA  
ASIAN & PACIFIC ISLANDER AMERICAN VOTE

# AANHPI Community Data Explorer

## Overview

# Power In Numbers

1

We are pushing state & federal policymakers to ensure that AANHPI communities are **recognized** and **prioritized**

2

We are prioritizing accurate data and **timely insights, and community-friendly tools** to create positive social change and policy impact

3

We are amplifying and engaging AANHPI communities at the state and local level to demonstrate our *power in numbers* and increase investments in civic engagement

- **Why was the Community Data Explorer Tool created?**
  - *Ensure communities have **access** to disaggregated data*
  - *Enable communities/community organizations to **utilize data to advocate** for their needs and inform their work*
- **Developed in partnership with community**

## Community Data Explorer

- **What is in the Community Data Explorer Tool?**
    - *Pulls data from the American Community Survey*
    - *Explore population trends, socioeconomic status, education, and other indicators*
    - *Available for racial and detailed ethnicity groups*
    - *Look at national, state, and local levels across time*
  - **User-friendly interface-** *visual charts, Community Snapshots, Community Deep Dives, Data Tables*
  - **More timely and detailed data**
-

# AANHPI Community Data Explorer

AANHPI Community Data Explorer compiles demographic insights on Asian American, Native Hawaiian, and Pacific Islander communities. This tool provides valuable resources for journalists, community organizations, governments, and policymakers to make informed decisions and foster inclusive growth of AAPI communities. Use the tool to explore population trends, socioeconomic status, and integration of AAPI communities over time and across the country.

Share your insights! Take a screenshot and let us know by email ([info@aapidata.com](mailto:info@aapidata.com)), [Instagram](#), or [LinkedIn](#).

Make selections below to begin exploring the data.

Select State

United States

Select Race group(s)

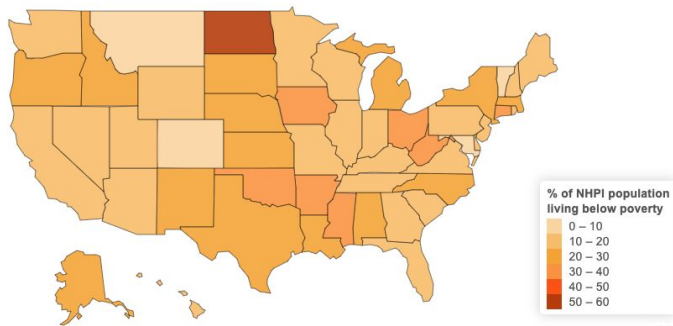
Asian Alone or in Combo

NHPI Alone or in Combo

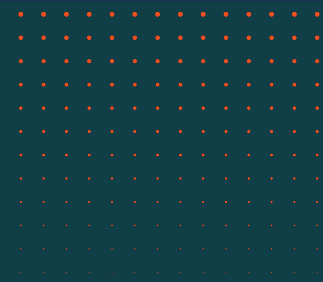
Select Ethnicity group(s)

Asian: Asian Indian Asian: Chinese Asian: Hmong

Pacific Islander: Native Hawaiian Pacific Islander: Samoan



GO TO DASHBOARD →



# Steps in the Learning Journey

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*Curiosity* → **Data** → *Insights* → **Action**

# *Curiosity* → **Data** → *Insights* → **Action**

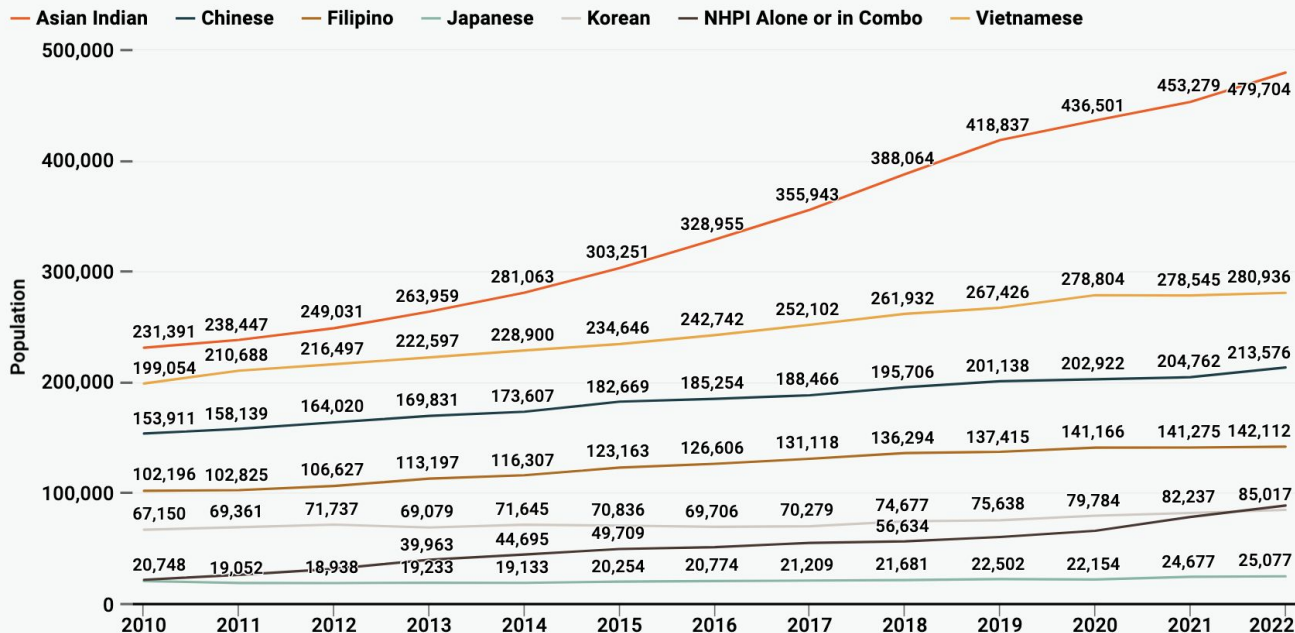
1. Who are the top two Asian groups in Texas?
2. Which groups in Illinois have language needs greater than Latinos?
3. Has poverty changed for groups like Hmong in California?
4. Which group in New Jersey has the lowest citizenship rate?

# Texas

## Population in Texas



Estimated number of residents.



DATA SOURCE: American Community Survey, 5-year microdata sample accessed through IPUMS USA, University of Minnesota, [www.ipums.org](http://www.ipums.org).

NOTE: Margins of error are not presented for the data in this tool. Use estimates of 0% or 100% with caution.

NOTE: Ethnicity groups represent those who identify with that group alone, not 'alone or in combo'.

# *Curiosity* → **Data** → *Insights* → **Action**

1. Who are the top two Asian groups in Texas?
2. Which groups in Illinois have language needs greater than Latinos?
3. Has poverty changed for groups like Hmong in California?
4. Which group in New Jersey has the lowest citizenship rate?

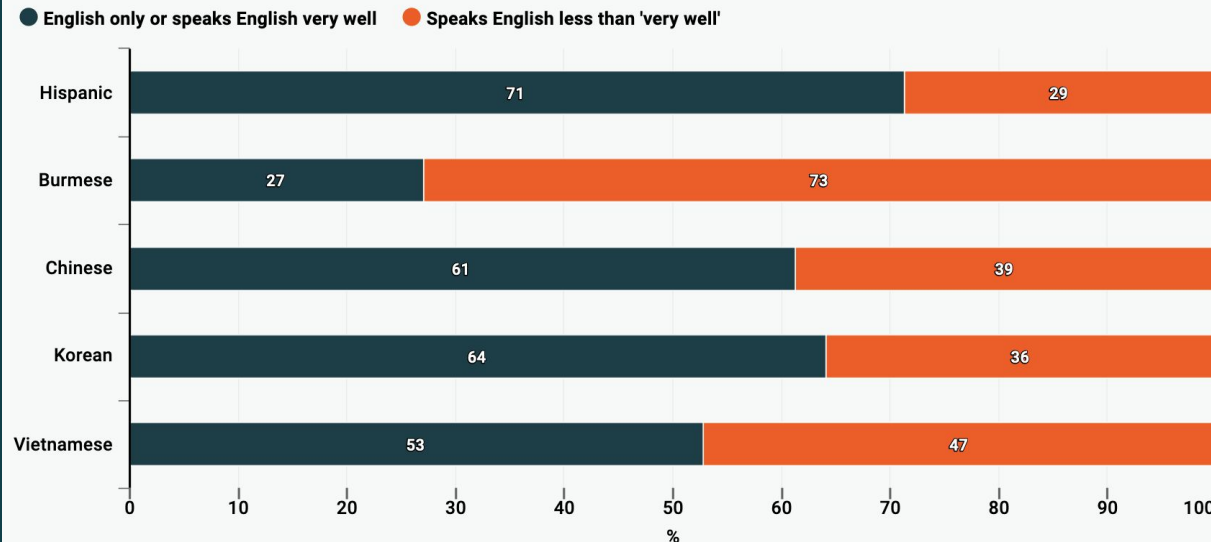
# Illinois

## Language in Illinois



Estimated share of residents who report speaking English "very well" and less than "very well."

NOTE: Estimates for the following groups are derived from a small sample (fewer than 100 people) and should be interpreted with caution: Burmese



DATA SOURCE: American Community Survey 2022 5-year microdata sample accessed through IPUMS USA, University of Minnesota, [www.ipums.org](http://www.ipums.org)

NOTE: Margins of error are not presented for the data in this tool. Use estimates of 0% or 100% with caution.

NOTE: Ethnicity groups represent those who identify with that group alone, not 'alone or in combo'.

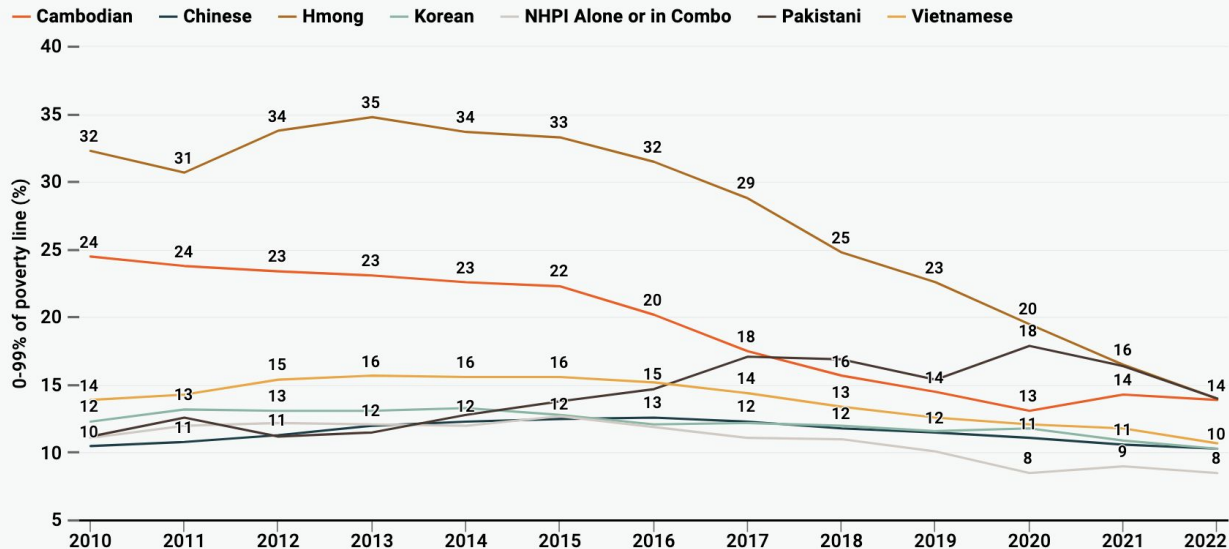
# *Curiosity* → **Data** → *Insights* → **Action**

1. Who are the top two Asian groups in Texas?
2. Which groups in Illinois have language needs greater than Latinos?
3. **Has poverty changed for groups like Hmong in California?**
4. Which group in New Jersey has the lowest citizenship rate?

# California

## Poverty in California

Estimated share of residents who live at different levels of the Federal Poverty Line (FPL). Whether an individual falls below the official "poverty line" depends not only on total family income, but also on the size of the family, the number of people in the family who are children, and the age of the householder (under/over age 65).



DATA SOURCE: American Community Survey, 5-year microdata sample accessed through IPUMS USA, University of Minnesota, [www.ipums.org](http://www.ipums.org).

NOTE: Margins of error are not presented for the data in this tool. Use estimates of 0% or 100% with caution.

NOTE: Ethnicity groups represent those who identify with that group alone, not 'alone or in combo'.

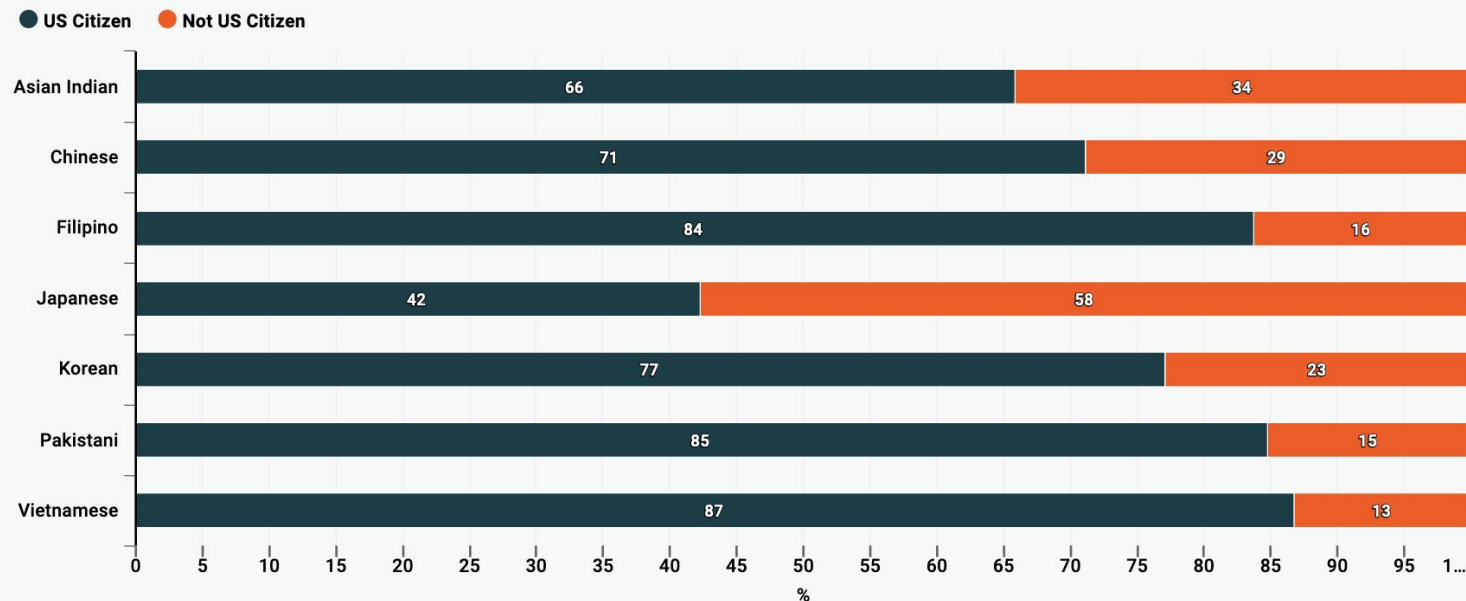
# *Curiosity* → **Data** → *Insights* → **Action**

1. Who are the top two Asian groups in Texas?
2. Which groups in Illinois have language needs greater than Latinos?
3. Has poverty changed for groups like Hmong in California?
4. Which group in New Jersey has the lowest citizenship rate?

# New Jersey

## Citizenship in New Jersey

Estimated share of residents who are US citizens and not US citizens. US citizens includes naturalized citizens.



DATA SOURCE: American Community Survey 2022 5-year microdata sample accessed through IPUMS USA, University of Minnesota, [www.ipums.org](http://www.ipums.org).

NOTE: Margins of error are not presented for the data in this tool. Use estimates of 0% or 100% with caution.

NOTE: Ethnicity groups represent those who identify with that group alone, not 'alone or in combo'.

# Community Data Explorer

## Filter and download data

Select State

Minnesota

Select Area Subregion

None

Select Race group(s)

Select Ethnicity group(s)

Asian: Hmong x

*Note: By default, table is sorted by Year, Metric, and Race/Ethnicity. Click column headers to sort differently.*

Year	State	Subregion	Race/Ethnicity	Metric	Metric Value	Value
All		All	All	Language		
2022	Minnesota	Minnesota	Asian: Hmong	Language	English only or speaks English very well	66.8
2022	Minnesota	Minnesota	Asian: Hmong	Language	Speaks English less than 'very well'	33.2
2021	Minnesota	Minnesota	Asian: Hmong	Language	English only or speaks English very well	65.8
2021	Minnesota	Minnesota	Asian: Hmong	Language	Speaks English less than 'very well'	34.2
2020	Minnesota	Minnesota	Asian: Hmong	Language	English only or speaks English very well	65.1
2020	Minnesota	Minnesota	Asian: Hmong	Language	Speaks English less than 'very well'	34.9

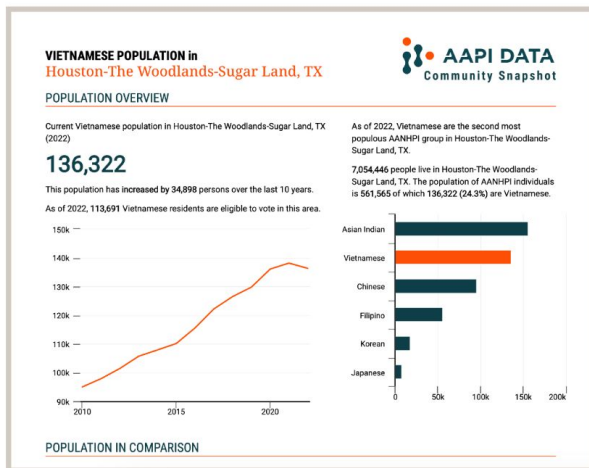
# Community Data Explorer



HOME DASHBOARD TABLES **PDFS** ABOUT

## Download resources for your community!

These PDFs are generated using data from the most recent 5-year IPUMS dataset. Due to small sample sizes for certain geographies and race-ethnic groups, not all geographies and race-ethnic groups are available.



### Option 1: Community Snapshot

Download a styled infographic for your community of choice

Choose state

Texas

Choose type of geography

MSA

Choose geography

Houston-The Woodlands-Sugar Land, TX

Choose race/ethnicity

Asian: Vietnamese



DOWNLOAD COMMUNITY SNAPSHOT

# Community Data Explorer



HOME DASHBOARD TABLES PDFS ABOUT

## SAMOAN POPULATION in Utah



POPULATION	Samoan	Asian alone or in combo	NHPI alone or in combo	All residents
Total population	8,804	124,088	41,396	3,283,809
CITIZENSHIP (%)	Samoan	Asian alone or in combo	NHPI alone or in combo	All residents
US Citizen	85.5	79.6	90.7	95.1
Not US Citizen	14.5	20.4	9.3	4.9
NATIVE BORN (%)	Samoan	Asian alone or in combo	NHPI alone or in combo	All residents
Foreign born	43.8	44.2	25.6	9.3
Native born	56.2	55.8	74.4	90.7
LANGUAGE (%)	Samoan	Asian alone or in combo	NHPI alone or in combo	All residents
English only or speaks English very well	91.4	80.8	93	95.3
Speaks English less than 'very well'	8.6	19.2	7	4.7
INCOME (\$)	Samoan	Asian alone or in combo	NHPI alone or in combo	All residents
Median Household Income	\$72,529	\$85,528	\$73,743	\$84,996
EDUCATION (%)	Samoan	Asian alone or in combo	NHPI alone or in combo	All residents

## Option 2: Community Deep Dive

Download all data for your community in tabular format.

Choose state

Utah

Choose type of geography

None

Choose geography

Utah

Choose race/ethnicity

Pacific Islander: Samoan



DOWNLOAD COMMUNITY DEEP DIVE

# Strengthening the Federal Government's Data Disaggregation Pillar



Change	What?	Why?
<b>I. Combined Race and Ethnicity Question</b>	<i>Moving away from asking two separate questions on Hispanic or Latino ethnicity</i>	<i>Previous question was confusing, increasing non-response</i>
<b>II. Added Middle Eastern or North African (MENA) as an additional category</b>	<i>Added a new minimum category for race and ethnicity- “Individuals with origins in any of the original peoples of the Middle East or North Africa...”</i>	<i>Long term mobilization, previously included as “White”, issues of discrimination</i>
<b>III. Update Terminology in SPD 15</b>	<i>A range of language amended e.g. replace “Far East” with “Central or East Asian” and “Indian Subcontinent” with “South Asia” in the definition</i>	<i>Utilizing language that is clear, inclusive, and increases response rates</i>
<b>IV. Require Collection Beyond Minimum Race &amp; Ethnicity Categories</b>	<i>Federal agencies MUST collect data beyond the new seven categories (<b>unless</b>)</i>	<i>Strong push from communities, more reflective of our demographics</i>
<b>V. Require agency “Action Plans”</b>	<i>Within 18 months, agencies must submit an “Action Plan on Race and Ethnicity”. Full compliance within 5 years (March 28, 2029)</i>	<i>Benchmarks for future progress monitoring</i>

## Current Forms

**Specific Instructions:** The two questions below are designed to identify your ethnicity and race. **Regardless of your answer to question 1, go to question 2.**

**Question 1. Are You Hispanic or Latino?** (A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.)

☐ Yes ☐ No

**Question 2.** Please select the racial category or categories with which you most closely identify by placing an “X” in the appropriate box. Check as many as apply.

RACIAL CATEGORY (Check as many as apply)	DEFINITION OF CATEGORY
<input type="checkbox"/> American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
<input type="checkbox"/> Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
<input type="checkbox"/> Black or African American	A person having origins in any of the black racial groups of Africa.
<input type="checkbox"/> Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
<input type="checkbox"/> White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

# Future Forms

<https://aapidata.com/action/spd15-report/>

Figure 1

Race and Ethnicity Question with Minimum Categories, Multiple Detailed Checkboxes, and Write-In Response Areas with Example Groups

**What is your race and/or ethnicity?**  
*Select all that apply and enter additional details in the spaces below.*

☐ **American Indian or Alaska Native** – Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.

☐ **Asian** – Provide details below.

<input type="checkbox"/> Chinese	<input type="checkbox"/> Asian Indian	<input type="checkbox"/> Filipino
<input type="checkbox"/> Vietnamese	<input type="checkbox"/> Korean	<input type="checkbox"/> Japanese

*Enter, for example, Pakistani, Hmong, Afghan, etc.*

☐ **Black or African American** – Provide details below.

<input type="checkbox"/> African American	<input type="checkbox"/> Jamaican	<input type="checkbox"/> Haitian
<input type="checkbox"/> Nigerian	<input type="checkbox"/> Ethiopian	<input type="checkbox"/> Somali

*Enter, for example, Trinidadian and Tobagonian, Ghanaian, Congolese, etc.*

☐ **Hispanic or Latino** – Provide details below.

<input type="checkbox"/> Mexican	<input type="checkbox"/> Puerto Rican	<input type="checkbox"/> Salvadoran
<input type="checkbox"/> Cuban	<input type="checkbox"/> Dominican	<input type="checkbox"/> Guatemalan

*Enter, for example, Colombian, Honduran, Spaniard, etc.*

☐ **Middle Eastern or North African** – Provide details below.

<input type="checkbox"/> Lebanese	<input type="checkbox"/> Iranian	<input type="checkbox"/> Egyptian
<input type="checkbox"/> Syrian	<input type="checkbox"/> Iraqi	<input type="checkbox"/> Israeli

*Enter, for example, Moroccan, Yemeni, Kurdish, etc.*

☐ **Native Hawaiian or Pacific Islander** – Provide details below.

<input type="checkbox"/> Native Hawaiian	<input type="checkbox"/> Samoan	<input type="checkbox"/> Chamorro
<input type="checkbox"/> Tongan	<input type="checkbox"/> Fijian	<input type="checkbox"/> Marshallese

*Enter, for example, Chuukese, Palauan, Tahitian, etc.*

☐ **White** – Provide details below.

<input type="checkbox"/> English	<input type="checkbox"/> German	<input type="checkbox"/> Irish
<input type="checkbox"/> Italian	<input type="checkbox"/> Polish	<input type="checkbox"/> Scottish

*Enter, for example, French, Swedish, Norwegian, etc.*

Figure 2

Race and Ethnicity Question with Minimum Categories Only and Examples

**What is your race and/or ethnicity?**  
*Select all that apply.*

☐ **American Indian or Alaska Native**  
*For example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.*

☐ **Asian**  
*For example, Chinese, Asian Indian, Filipino, Vietnamese, Korean, Japanese, etc.*

☐ **Black or African American**  
*For example, African American, Jamaican, Haitian, Nigerian, Ethiopian, Somali, etc.*

☐ **Hispanic or Latino**  
*For example, Mexican, Puerto Rican, Salvadoran, Cuban, Dominican, Guatemalan, etc.*

☐ **Middle Eastern or North African**  
*For example, Lebanese, Iranian, Egyptian, Syrian, Iraqi, Israeli, etc.*

☐ **Native Hawaiian or Pacific Islander**  
*For example, Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, etc.*

☐ **White**  
*For example, English, German, Irish, Italian, Polish, Scottish, etc.*

Figure 3

Race and Ethnicity Question with Minimum Categories Only

**What is your race and/or ethnicity?**  
*Select all that apply.*

☐ **American Indian or Alaska Native**

☐ **Asian**

☐ **Black or African American**

☐ **Hispanic or Latino**

☐ **Middle Eastern or North African**

☐ **Native Hawaiian or Pacific Islander**

☐ **White**

# OMB's 2024 Federal Register Notice and Interagency Technical Working Group's Final Report and Annexes



[2024 Federal Register Notice](#)



[Final Recommendations for CSOTUS \[1.7 MB\]](#)



[Annex 1. Content Team Final Report \[2.0 MB\]](#)



[Annex 2. Testing Team Final Report\\_with Appendices \[13.4 MB\]](#)



[Annex 3. Implementation Team Final Report \[1.2 MB\]](#)



[Annex 4. Communications and Outreach Team Final Report \[1.3 MB\]](#)



[Annex 5. Positions on Final Recommendations \[1.0 MB\]](#)



[Annex 6. ITWG Bridging Team Methods Report \[1.1 MB\]](#)

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## FEDERAL INTERAGENCY TECHNICAL WORKING GROUP ON RACE AND ETHNICITY STANDARDS

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## FEDERAL INTERAGENCY TECHNICAL WORKING GROUP ON RACE AND ETHNICITY STANDARDS

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## FEDERAL INTERAGENCY TECHNICAL WORKING GROUP ON RACE AND ETHNICITY STANDARDS

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# Strengthening the Federal Government's Data Disaggregation Pillar

Key implementation recommendations for 2024 revisions to detailed race and ethnicity standards under Statistical Policy Directive 15

APRIL 16, 2024



## Executive Summary

In March 2024, the federal government announced a critical step forward in improving data collections related to race and ethnicity across all federal agencies. Two key pillars of the announced revision of the Office of Management and Budget's (OMB) Statistical Policy Directive 15, or SPD 15, are a) making changes to the minimum reporting categories that add Middle Eastern and North African and Hispanic/Latino to a combined category of race and ethnicity; and b) making detailed reporting categories, such as Vietnamese, Samoan, Haitian, and Cherokee, the default expectation for all federal agency data collections.

This policy brief focuses on timely and successful implementation of the second dimension of detailed reporting categories, which we refer to as the "data disaggregation pillar." OMB's update to SPD 15, and the associated Final Recommendations Report of the Federal Interagency Technical Working Group on Race and Ethnicity Standards, leave three important gaps in preparation for successful implementation that need to be remedied as soon as possible, which include:

1. No existing inventory or baseline database of all federal agency data collections and the extent to which they provide disaggregated data;
2. No named body that monitors, evaluates, and provides technical assistance across agencies to move towards full compliance on data disaggregation; and
3. No formal and regular mechanism for community input and expertise, including from industry and scientific researchers who work on matters of data equity.

First, the Chief Statistician of the United States must publish a data disaggregation inventory of all current federal agency data collections by September 2024, with an indication of whether, and to what extent, detailed ethnicity data are provided in the collection and publication of statistical data tables and individual-level microdata. In order for federal agencies to successfully produce Agency Action Plans for SPD 15 implementation within the announced 18-month period (i.e. by September 2025), a baseline inventory that will inform the second pillar of SPD 15 must be published no later than September 2024.

In addition, by June 2024 the Chief Statistician must clearly designate a centralized, coordinated body within the Office of Statistical Programs & Standards that will monitor, evaluate, and provide technical assistance across agencies to move towards full compliance on data disaggregation over the next five years. At present, the information provided in the March 2024 update to SPD 15 specifies particular roles for the Office of Information and Regulatory Affairs (OIRA) with respect to approving exemption requests on data disaggregation, and the Interagency Committee on Race and Ethnicity Standards to conduct research as needed to inform future changes to SPD 15. In order to ensure timely, effective, and coordinated progress across all federal agencies on the data disaggregation pillar, OMB needs to name and provide staffing, resources, and authority to an entity that can provide this coordinated implementation function, with the ability to provide annual reports on progress to Congress and the general public.

STRENGTHENING THE FEDERAL GOVERNMENT'S DATA DISAGGREGATION PILLAR

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## Short-term Recommendations to Inform Agency Action Plans

We have analyzed OMB's updated Statistical Policy Directive 15, as well as related preparatory annexes from the Federal Interagency Technical Working Group on Race and Ethnicity Standards. In doing so, we have noticed two major gaps in preparation for successful implementation of the data disaggregation pillar, that must be remedied as soon as possible.

The five key dimensions articulated in this document as well as the provided recommendations will be critical to the success of SPD 15. We encourage OMB, federal agencies, and Congress to review these findings and support these recommendations moving forward. At this critical juncture where OMB and federal agencies are beginning the transition to implementation, we emphasize the actions outlined following below to provide a springboard for success.

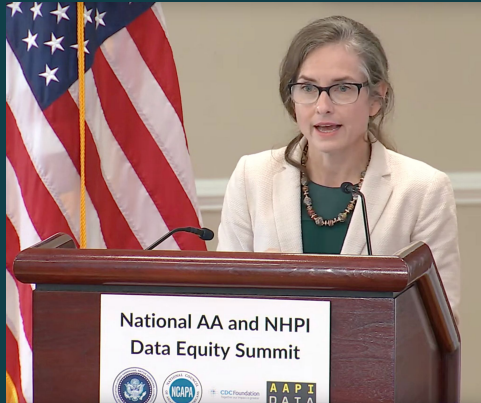
Issue	Solution	Timeline
No existing centralized inventory of federal data collections to measure progress by federal agencies	The Chief Statistician must publish an inventory of all current federal agency data collections, with an indication of whether – and to what extent – detailed ethnicity data are provided in the collection and publication of statistical data tables and individual-level microdata	By September 2024
No mention of a centralized body that monitors, evaluates, and provides technical assistance across agencies to move towards full compliance on data disaggregation	The Chief Statistician needs to clearly designate a centralized, coordinated body within the Office of Statistical Programs & Standards that will monitor, evaluate, and provide technical assistance across agencies to move towards full compliance on data disaggregation over the next five years.	By June 2024
Lack of clarity on how the public will be included in ongoing efforts by OMB and agencies	The Chief Statistician must convene the Interagency Committee on Race and Ethnicity Standards, and by September 2024 the Interagency Committee must begin receiving input on the collection of detailed categories from experts in community organizations and scientific research institutions.	June 2024 – September 2024

As detailed previously, the first gap relates to the relative dearth of information about existing efforts on data disaggregation across all federal agencies and all existing federal data collections that include race and ethnicity. The second gap relates to insufficient mention of a mechanism for centralized and coordinated implementation, monitoring and evaluation of data disaggregation across federal agencies.

We propose that OMB make clear the specific group within OMB that is tasked with this responsibility and that can benefit from timely, regular, and institutionalized input from experts in community, academia, and industry. Finally, as referenced, SPD 15 specifies no mechanism for regular community input on implementation of data disaggregation.

# *AAPI Data's Role*

2022 White House Summit on Data Equity  
2023 WH Forum (> 300 attendees)  
2024 Letter to White House and Congress  
2024 Meetings with OMB & Chief Statistician



# Key Implementation Recommendations

Issue	Solution	Timeline
No existing centralized inventory of federal data collections to measure progress by federal agencies	The Chief Statistician must publish an inventory of all current federal agency data collections, with an indication of whether – and to what extent – detailed ethnicity data are provided in the collection and publication of statistical data tables and individual-level microdata	By September 2024
No mention of a centralized body that monitors, evaluates, and provides technical assistance across agencies to move towards full compliance on data disaggregation	The Chief Statistician needs to clearly designate a centralized, coordinated body within the Office of Statistical Programs & Standards that will monitor, evaluate, and provide technical assistance across agencies to move towards full compliance on data disaggregation over the next five years.	By June 2024
Lack of clarity on how the public will be included in ongoing efforts by OMB and agencies	The Chief Statistician must convene the Interagency Committee on Race and Ethnicity Standards, and by September 2024 the Interagency Committee must begin receiving input on the collection of detailed categories from experts in community organizations and scientific research institutions.	June 2024 - September 2024

# Updated Implementation Recommendations

Issue	Solution
Limited transparency by OMB into the structure, membership, and roles pertaining to the implementation of SPD-15	OMB to publish detailed information on the structure, membership and roles pertaining to the implementation of SPD-15 on <a href="https://spd15revision.gov/">https://spd15revision.gov/</a> and regularly update the community on changes
No existing centralized inventory of federal data collections to measure progress by federal agencies	Ensure OMB promulgates statutorily-required implementation guidance on data inventories, and provides technical assistance to federal agencies on implementation with support from the Chief Data Officer Council and published guidance for full agency compliance.
Concern of federal agency exemptions to SPD 15 compliance, and no clear agency guidance on OIRA exemption process provided	<p>OMB's guidance should be narrowly tailored to ensure compliance with SPD 15 and in furtherance of evidence based decision making mandated by 'The Foundations for Evidence-Based Policymaking Act'</p> <p>Publish guidance to federal agencies on the federal exemption process for SPD 15, and ensure community feedback is incorporated in the process.</p>
Lack of clarity on how the public will be included in ongoing efforts by OMB and agencies	Ensure OMB provides appropriate technical support to federal agencies on robust and meaningful community engagement, and that federal agencies are meeting with community members and incorporating feedback in the process of formulating their mandated federal agency action plans

## Is Your State Ready for SPD 15?

- **Identify which state agency or agencies are lead contact with OMB**
  - *Possibilities: Dept of Finance, Demographic Units*
- **Outreach to key agencies with significant federal interface**
  - *Health and Human Services*
  - *Education*
  - *Justice*
  - *Labor*
- **Directly engage with the Office of Management and Budget**
  - *<https://spd15revision.gov/>*
- **Let us help you on OMB Engagement**
  - Use case development
  - Technical assistance with state agency meetings

# Thank you.

Contact [action@aapidata.com](mailto:action@aapidata.com) for questions & feedback.