



January 28, 2015

Ms. Jennifer Jessup
Department of Commerce
Room 6616
14th and Constitution Avenue NW
Washington, DC 20230

Dear Ms. Jessup:

We are writing to express the strong support of the Arab American Institute for the Census Bureau's plan to test a Middle East and North Africa category as part of its 2015 research for content improvements to the 2020 Census. As you well know, there is currently no ethnic category for Americans from the MENA Region on the U.S. Census. This has led to a significant undercount of Arab Americans, creating barriers to many basic rights and services. The creation of a coherent ethnic category for the MENA region will have a positive impact on the treatment and services available to members of our community by addressing the longstanding undercount that has served as a barrier to representation, education, health, and employment. New and expanded data provided by the inclusion of a Middle East and North Africa checkbox on the 2020 Census will arrive at a better count of our community and ensure greater access to necessary resources.

In order to capture the most accurate count of Arab Americans, we encourage the Bureau to use a comprehensive geographic definition of the MENA region that includes the population with origins in member nations of the League of Arab States as well as Turkey, Iran, Israel, and several sub-national communities. We believe this definition of the population of the Middle East and North African region will provide the most comprehensive data on the region's diverse community, capturing the multiple racial, national and sub-national identities of the region. The full list of included groups is as follows:

- a. ***League of Arab States:*** Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen.
- b. ***Non-Arab MENA States:*** Turkey, Iran and Israel.
- c. ***Sub-national communities:*** Assyrians, Chaldeans, Kurds, Berber.

We further advise the Census Bureau to revise the examples it provides in the notice in order to represent the diverse communities from the MENA region in a more equitable manner. Currently, North African examples are over-represented and do not correspond with the relative

population size. Additionally, important regions in the Middle East are not mentioned (e.g. the Gulf). Finally, subnational and transnational groups are not listed. In particular, we recommend that the Census Bureau list examples that correspond with the following six categories:

1. ***The Levant:*** We suggest listing Lebanon due to its large size. Should the Census Bureau wish to list also Syria; that decision should not be done at the expense of other categories we suggest below.
2. ***North Africa:*** We recommend listing only Egypt. Again, should the Census Bureau wish to list also Morocco that decision should not be done at the expense of other categories.
3. ***Sub Saharan Africa:*** Current examples ignore non-white Arabs (specifically Sudan, Somalia and Mauritania). We recommend listing either Somalia or Sudan in the examples.
4. ***Gulf States:*** We recommend listing Yemen as an example.
5. ***Non-Arab MENA:*** We recommend keeping Iran as an example due to its large size.
6. ***Sub-national ethnicities:*** Assyrians, Chaldeans, Kurds and Berber are not listed. The Assyrian/Chaldean community is a significant member of our coalition and a historic community in Middle East. Additionally, they are the largest in this group.

Finally, we would like to voice our support for the inclusion of the category on the form as a distinct question on ethnicity as opposed to the presence of the category in a combined question format. We maintain that persons from the MENA region, much like those of Hispanic origin, identify with many racial backgrounds and that ethnicity is the appropriate approach to this new category. We support the importance of testing a category for a growing American ethnic population that is mostly invisible in federal statistics and reports, and yet remains hyper-visible in our country's political, policy, law enforcement and security arenas. We believe accurate and inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues.

We would like to express our thanks for the crucial role the Census Bureau has played in pushing forward the testing of this new category. The Arab American Institute will continue to work alongside the Bureau throughout the testing process in the effort to create the MENA Category. We are confident that our joint efforts will result in a better count of our community.

Sincerely,

Maya Berry
Executive Director
Arab American Institute and Foundation

Helen Hatab Samhan
Board of Directors
Arab American Institute and Foundation