



The American-Arab Anti-Discrimination Committee

Comments and Recommendations to the

United States Census Bureau

on the

2015 National Content Test and Inclusion of the MENA Category

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To: Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce

I am writing to you on behalf of the American-Arab Anti-Discrimination Committee (ADC), the country's largest Arab-American civil rights organization. ADC is committed to protecting civil rights, promoting mutual understanding, and preserving the Arab cultural heritage. ADC has protected the Arab-American community for thirty five years against discrimination, defamation, racism, and stereotyping. ADC respectfully takes this opportunity to submit comments and recommendations to the Department of Commerce regarding the proposed information collections of the 2015 National Content Test (NCT), and particularly with regard to the inclusion of the proposed Middle Eastern or North African (MENA) category in the race question.

Inclusion of the MENA category on the 2015 National Content Test is both necessary and practical. ADC is strongly concerned that there is currently no category on the U.S. Census that includes the MENA community, and effectively Arab-Americans. The MENA demographic should include the 22 Arab countries in the Arab League: Algeria, Bahrain, the Comoros Islands, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Morocco, Mauritania, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, the United Arab Emirates, and Yemen. Arab countries have a rich diversity of ethnic, linguistic and religious communities. The lack of a racial or ethnic category that accurately reflects the Arab-American population has led to a significant under-count of our community. This impacts agencies' evaluation of our community's needs, as well as our community's access to services and resources.

The necessity and practical utility of testing a MENA category on the 2015 National Content Test (NCT):

ADC supports the ongoing evaluation of Census questions that gather data on race and ethnicity because of its necessity and practical utility in having an accurate understanding of the make-up of our ever-growing and diverse country. The collection of accurate and comprehensive data on race and ethnicity is necessary for implementing many important civil rights laws and policies, such as the Civil Rights Act of 1964 and the Voting Rights Act of 1965. For instance, the Voting Rights Act prohibits discrimination on the basis of race, color, or membership in minority language group. Accurate data on race and ethnicity is needed to evaluate the efficacy of voting rights protections and monitor attempts to suppress and dilute the vote of minority populations. It is also need to evaluate the fairness of political representation and redistricting. Further, this data is critical for monitoring equal opportunity across sectors of the economy, including housing, education, health care, and employment.

Inclusion of a MENA category would have a positive impact on the Arab-American community in a variety of ways. Being counted on the U.S. Census would benefit our community by making Arab-Americans eligible for many services and opportunities that are provided for minority populations, such as language assistance, educational grants, funding for cultural competency training, and minority business development loans. Inclusion of a MENA category in the Census would also allow for more effective implementation, monitoring, and enforcement of civil rights protections for the Arab-American community. For instance, advocacy groups such as ADC would have more accurate data to measure racial and ethnic discrimination against Arab-Americans.

Ways to enhance the quality, utility, and clarity of the information to be collected under the MENA category on the U.S. Census:

1. Including a geographically-broad MENA category with diverse examples of countries of origin

First, ADC strongly encourages the U.S. Census Bureau to use a comprehensive geographic definition of the MENA region in the race question. This regional MENA category should include all of the Arab countries which are members of the Arab League, which were previously mentioned, as well as the non-Arab states of Turkey and Iran. The U.S. Census Bureau can enhance the clarity of the information to be collected and minimize the burden on respondents by including diverse country examples in the MENA check box category for the race question. According to Federal Register Notice 79 FR 71377, the 2015 National Content Test will include examples of “Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian, etc.” These country examples support a geographically-broad MENA category because they include countries from the Levant, the Gulf, and North Africa. However, while the Levant and North Africa are represented twice in these country examples, ADC is concerned that there are no Arab country examples from the Gulf or Sub-Saharan Africa. ADC strongly recommends that the Bureau also include an example from Sub-Saharan Africa, such as Somalia or Sudan. ADC also recommends adding a Gulf Arab country, such as Yemen. Listing these diverse country examples will help to promote a broad regional definition of the MENA category, and thus allow more groups to identify with the MENA category.

2. Including instructions to “print your specific origin(s)/ethnicities” in the space provided

A MENA category that also allows for a space for groups to print their specific origin(s)/ethnicities will enhance the quality, utility, and clarity of the information collected. The word “ethnicity” should be included in the instructions since “origin” alone can be a confusing term. Additionally, including “ethnicities” in the instructions will allow the many sub-national minority communities that originate in this region to self-identify their specific ethnic group (e.g., Assyrian, Chaldean, Kurd, Berber, etc.). This will also allow the different ethnicities that originate in this region to identify with both their country of origin and ethnic group (e.g., Iraq and Arab, Iraq and Kurd, Morocco and Arab, Morocco and Berber, etc.). Examples of ethnicities should be listed in addition to the examples for countries of origin. This will reduce the burden on respondents and enhance the quality, utility, and clarity of the information to be collected.

Ways to minimize the burden of the collection of information on respondents:

1. Offering Arabic language support

According to Notice 79 FR 71377, an objective of the NCT is to test different options for offering non-English materials, and the goal is to provide language support for respondents with limited English proficiency. The Census Bureau should include materials in Modern Standard Arabic, which is the official and formal Arabic used by all regional Arabic dialects in printed materials. Offering Arabic language support would help to minimize the burden of the collection

of information on respondents and boost response from those Arab-Americans who speak English as a second language. While the majority of Arab-Americans are bilingual, about half of Arab-Americans speak a language other than English in their homes. The availability of Arabic translated materials to respondents who need language support, will help maximize the number of non-English speakers that will be able to participate in the U.S. Census. This will help to ensure that all persons are counted.

2. Use of Internet-based questionnaires

a. Reducing the cost on the U.S. Census Bureau

The costs of offering non-English language materials can be reduced by use of Internet-based questionnaires, which negate the costs of producing extra materials for respondents with limited English proficiency. According to Notice 79 FR 71377, the language support options being explored on the NCT include online Spanish questionnaires, dual-language English and Spanish paper questionnaires and letters, and additional questionnaire options and support in non-English languages. Use of online questionnaires would allow the Census Bureau to expand its language support materials to minority languages that are less common than Spanish, such as Arabic, while also furthering the Census Bureau's high-level goal of greatly reducing paper responses in the 2020 Census.

b. Reducing the burden on respondents

The use of Internet-based questionnaires can reduce the burden on respondents by making the questionnaire easily accessible for persons who use the internet. For instance, if the Census Bureau provides a web link to the questionnaire, organizations such as ADC can forward the link to their members to remind them to respond to the questionnaire. These additional

reminders will reduce the burden on respondents and thus increase the response rates. Further, ADC encourages to making the Internet-based questionnaire simple to use for those who are not technologically savvy. This entails making it simple for respondents to navigate through questions, limiting the number of questions on each web screen, and providing FAQs on how to complete and/or navigate the questionnaire.


Conclusion:

ADC appreciates the U.S. Census Bureau for its work to develop the new MENA category and test it on the 2015 NCT. ADC believes that the MENA category is a necessary and practical addition to the Census race response categories that will greatly benefit the Arab-American community. ADC urges the U.S. Census Bureau to include the MENA category on the 2020 Census. The inclusion of a MENA category on the U.S. Census will help ADC to fulfill its mission of protecting the civil rights and civil liberties of Arab-Americans.

Respectfully submitted,



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