



October 24, 2014

Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce  
Room 6616, 14th and Constitution Avenue  
NW., Washington, DC 20230  
[jjessup@doc.gov](mailto:jjessup@doc.gov)

Submitted via email

Re: Comments on 2015 Optimizing Self-Response and Census Tests  
Federal Register Volume 79, Number 169. Tuesday, September 2, 2014  
Pages 51948-51950 Department of Congress  
Agency: U.S. Census Bureau  
FR Doc No: 2014-20661

Dear Ms. Jessup:

Project RACE (Reclassify All Children Equally) respectfully submits the comments below regarding the 2015 Optimizing Self-Response and Census Tests. We are the national advocates for multiracial children and their families. We are often rendered invisible by federal agencies in the discussions and planning for racial and ethnic classifications. We are concerned with ways to enhance the clarity of the information to be collected in the 2020 Census.

As you know, the 2000 Census partially accommodated multiracial respondents by allowing us to check more than one racial box. The request by the multiracial community to use the preferred term "multiracial" was denied. As a result, multiracial respondents who checked more than one race are called "MOOMs" (Check One Or More), "Two or More Race People," or "In Combination" respondents for purposes of tabulation.

OMB advised federal agencies to utilize "in combination" in its guidance for federal data on race and ethnicity in December, 2000. However, there has been much confusion about the nomenclature since 1997 when OMB specified, "When the primary focus of a report is on two or more specific identifiable groups in the population, one or more of which is racial or ethnic, it is acceptable to display data for each of the particular groups separately and to describe data relating to the remainder of the population by an appropriate collective description."

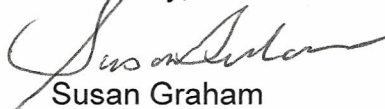
Our requests for utilizing the word "multiracial" on the federal forms has been denied, even though it is important for multiracial children to see a descriptive word for themselves that is correct, respectful, and accurate. We work with many schools, medical facilities, clinical trials, etc. that *do* use the term "multiracial" on the forms with these directions: *If you are multiracial, you may select two or more races*. We would like to see testing of this wording on the instructions for the 2020 Census. The Census Bureau personnel have indicated that will not happen.

It would be very meaningful to the multiracial population if the appropriate term is at the very least used for tabulation, replacing "in combination." Ironically, the Census Bureau often uses the term "multiracial" when discussing this population and in presentations, but not in its "official" data collection. The FDA has recommended "that study participants self-report race and ethnicity information whenever feasible, and that individuals be permitted to designate a multiracial identity." We just can't *use* the term "multiracial."

Additionally, it is reprehensible that OMB Bulletin No 00-02, Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement (March 9, 2000) sets forth racially insensitive instructions in its EEO Enforcement instructions, whereby a person who checks more than one race is assigned to *one* of their minority races. Discrimination is often the result of a person designating *more* than one race, and to be reassigned to one race only defeats the purpose of enforcement of Title VI of the Civil Rights Act of 1964. Unfortunately, we see cases where multiracial children are bullied *because* they are multiracial, and they have no protection in that eventuality under the OMB guidelines.

We ask that these issues be revisited in testing for the 2020 Census. Changing "in combination" to "multiracial" would mean government acceptance of a word that is very widely used by non-governmental entities. It would also indicate sensitivity for proper nomenclature that is given to other racial groups, which we have been asking for since 1990. Any consideration that can be given to this demographic group that is rapidly gaining numbers would be appreciated by the multiracial community. Thank you.

Sincerely,



Susan Graham  
Executive Director