## Comment on the potential elimination of the Ancestry question from the American Community Survey

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Due to the fact that the OMB is considering changes in the Racial and Ethnic classification to be used in the Census, the American Community Survey, and all other federal agency data collections, as well as many data collections that are maintained by other entities including public and private entities, as well as federal, state and local government agencies, I strongly recommend that no change be made to the collection of ancestry until the new rules for collection of race and ethnic data are promulgated by the OMB. There are several reasons for this. The question used in the 2020 Census and the 2020 and 2021 American Community Survey produced radically different race and Hispanic classifications than those that had been in place since effectively 1980 as amended by the 1997 OMB regulations. No crosswalk moving from the old to the new classification has been provided. It is now impossible to track the changes in race and Hispanic status using the new and old method for classifying race and Hispanic status. The major changes in the race and Hispanic questions in the 2020 Census and ACS were to allow a fill-in those reporting either the White race or the Black and African American race. (The attached table that includes a comparison of the race and Hispanic classification elicited by the old system for the 2019 ACS and new system for the 2021 ACS, plainly shows that the main changes found were due to adding the fill-in for black and white, and applying a content analysis to the answers in all the fill-ins for up to 200 characters and compare them with a set of responses, that provided for up to 10,000 different groupings. (Though not every item was used or presumably found in the population.) No full report is available that shows how such fill-ins changed the race distributions reported in the 2020 Census, indeed some have misinterpreted the change in the method as instead a change in race and Hispanic status. The attached tables show that the main change was elicited by the changed method of asking and coding the answers.

Until the OMB acts, that merging of ancestry with race and Hispanic status should not occur. Once the OMB does act, and if they promulgate a system with sub-categories and fill-ins for all of the different groups, then an effort should be made to both make sure the new race and Hispanic classification has a crosswalk to the old approach to race and Hispanic status, and for the old approach to ancestry so that it will be plain which differences are actual, and which are due to changes in the manner in which the information is collected. At this point, how the new system will actually function and when it will be adopted by the Census and other federal agencies, not to mention other entities that need to report data to state and federal agencies, is undetermined. It should be noted that at this writing the OMB taskforce has received over 8,000 comments on its preliminary proposal, and recently extended the comment period due after a request by the Leadership Conference on Civil and Human Rights.

Though I am a, a well-known provider of demographic information to literally millions of users throughout the United States throughout the United States, and though I have used Census and ACS extensively in my published academic work, I write this comment mostly from the perspective of demographer who has served as an expert in over 100 legal engagements. I have provided many reports and expert testimony in depositions and at trial. In virtually all cases issues of race, Hispanic Status or ancestry or origin were key. The way such variables are measured by the Census and by other agencies is absolutely crucial to bringing and resolving such matters fairly.

At this writing, we do not have information on how the new complex race and Hispanic question has actually worked, nor do we have tabulations from the ACS of the various fill-ins for black and white, so it is impossible to judge whether the ancestry question can be abandoned. Furthermore, since we do not know what the OMB standards for the area will be until they are finally approved it is premature to scrap an important and related question from the American Community Survey. For all these reasons, I recommend that changes for race and Hispanic status and ancestry not be made until there a final standards adopted. This is not the time to drop the ancestry question.

## 2010 and 2020 Census, 2019 and 2020 American Community Survey, 2010 and 2020 Census Estimates for Single Race and Race in Combination by Total, Non-Hispanic and Hispanic

201	0 and 2020 (	Census, 201	.9 and 2020 <i>A</i>	American Co	mmunity Sເ	ırvey, 20	)10 and 2020	Census Est	imates for	Single Race	and Race in	Combina	ation by Tot	al, Non-Hi	spanic and Hi	spanic		
	2010 Census					2020 Census						Differences						
	Total	Percent	Non Hisp	Percent	Hispanic	Percent	Total	Percent	Non Hisp	Percent	Hispanic	Percent	Total Change	Percent Change	Non Hisp	Percent Change	Hispanic	Percent Change
Total Pop	308,745,538		258,267,944		50,477,594		331,449,281		269,369,237		62,080,044		22,703,743	7.35%	11,101,293	4.30%	11,602,450	
White Alone	223,553,265	72.41%	196,817,552	76.21%	26,735,713	52.97%	204,277,273	61.63%	191,697,647	71.17%	12,579,626	20.26%	-19,275,992	-8.62%	-5,119,905	-2.60%	-14,156,087	
Black Alone	38,929,319	12.61%	37,685,848		1,243,471	2.46%	41,104,200	12.40%	39,940,338	14.83%	1,163,862	1.87%	2,174,881	5.59%	2,254,490	5.98%	-79,609	
Amind Alone	2,932,248	0.95%	2,247,098		685,150	1.36%	3,727,135	1.12%	2,251,699	0.84%	1,475,436	2.38%	794,887	27.11%	4,601	0.20%	790,286	
Asian Alone	14,674,252	4.75%	14,465,124	5.60%	209,128	0.41%	19,886,049	6.00%	19,618,719	7.28%	267,330	0.43%	5,211,797	35.52%	5,153,595	35.63%	58,202	27.83%
Native Hawaiian or Pacific Islander																	ļ	
Alone	540,013	0.17%	481,576		58,437	0.12%	689,966	0.21%	622,018	0.23%	67,948	0.11%	149,953	27.77%	140,442	29.16%	9,511	
Some Other Alone	19,107,368	6.19%	604,265		18,503,103	36.66%	27,915,715	8.42%	1,689,833	0.63%	26,225,882	42.25%	8,808,347	46.10%	1,085,568	179.65%	7,722,779	
Multi	9,009,073	2.92%	5,966,481	2.31%	3,042,592	6.03%	33,848,943	10.21%	13,548,983	5.03%	20,299,960	32.70%	24,839,870	275.72%	7,582,502	127.08%	17,257,368	567.19%
Total Races Tallied	318,575,855		264,780,772		53,795,083		367,504,295		283,922,761		83,581,534		48,928,440	15.36%	19,141,989	7.23%	29,786,451	55.37%
White Alone or in combination	231,040,398	74.83%	201,856,108	78.16%	29,184,290	57.82%	235,411,507	71.02%	203,890,286	75.69%	31,521,221	50.78%	4,371,109	1.89%	2,034,178	1.01%	2,336,931	8.01%
Black Alone or in combination	42,020,743	13.61%	40,123,525	15.54%	1,897,218	3.76%	46,936,733	14.16%	44,277,916	16.44%	2,658,817	4.28%	4,915,990	11.70%	4,154,391	10.35%	761,599	40.14%
Amind Alone or in combination	5,220,579	1.69%	4,029,675	1.56%	1,190,904	2.36%	9,666,058	2.92%	6,691,567	2.48%	2,974,491	4.79%	4,445,479	85.15%	2,661,892	66.06%	1,783,587	149.77%
Asian Alone or in combination	17,320,856	5.61%	16,722,710	6.47%	598,146	1.18%	24,000,998	7.24%	23,142,519	8.59%	858,479	1.38%	6,680,142	38.57%	6,419,809	38.39%	260,333	43.52%
Native Hawaiian or Pacific Islander																	ļ	
Alone or in combination	1,225,195	0.40%	1,014,888		210,307	0.42%	1,586,463	0.48%	1,336,035	0.50%	250,428	0.40%	361,268	29.49%	321,147	31.64%	40,121	
Some Other Alone or in combination	21,748,084	7.04%	1,033,866	0.40%	20,714,218	41.04%	49,902,536	15.06%	4,584,438	1.70%	45,318,098	73.00%	28,154,452	129.46%	3,550,572	343.43%	24,603,880	118.78%
	2019 American Community Survey					2019 American Community Survey				rvev		Differences						
	Total Percent Non Hisp Percent			Hispanic	Percent	Total Percent		Non Hisp Percent		-		Total Change Percent		Non Hisp Percent		Hispanic Percent		
Total Pop	328,239,523	rereent	267,754,746		60,484,777	refeelt	331,893,745	rereent	269,363,212	rereent	62,530,533	rereent	3,654,222	Change 1.11%	1,608,466	Change 0.60%	2,045,756	Change 3.38%
White Alone	236,532,194	72.06%	196,795,251		39,736,943	65.70%		61.15%	192,729,997	71.55%	10,224,392	16.35%	-33,577,805	-14.20%	-4,065,254	-2.07%	-29,512,551	
Black Alone	42,043,031	12.81%	40,650,969		1,392,062	2.30%	40,217,512	12.12%	39,285,530	14.58%	931,982	1.49%	-1,825,519	-4.34%	-1,365,439	-3.36%	-460,080	
Amind Alone	2,841,620	0.87%	2,212,455		629,165	1.04%	3,161,813	0.95%	1,755,908	0.65%	1,405,905	2.25%	320,193	11.27%	-456,547	-20.64%	776,740	
Asian Alone	18,608,918	5.67%	18,393,713		215,205	0.36%	19,174,507	5.78%	18,909,209	7.02%	265,298	0.42%	565,589	3.04%	515,496	2.80%	50,093	
Native Hawaiian or Pacific Islander			, ,		,				, ,		,		,		,			
Alone	610,822	0.19%	549,467	0.21%	61,355	0.10%	623,315	0.19%	563 <i>,</i> 376	0.21%	59,939	0.10%	12,493	2.05%	13,909	2.53%	-1,416	-2.31%
Some Other Alone	16,266,146	4.96%	833,835	0.31%	15,432,311	25.51%	23,899,490	7.20%	1,848,950	0.69%	22,050,540	35.26%	7,633,344	46.93%	1,015,115	121.74%	6,618,229	42.89%
Multi	11,336,792	3.45%	8,319,056	3.11%	3,017,736	4.99%	41,862,719	12.61%	14,270,242	5.30%	27,592,477	44.13%	30,525,927	269.26%	5,951,186	71.54%	24,574,741	814.34%
Total Races Tallied	340,687,227		276,792,644		63,894,583		376,715,561		284,789,218		91,926,343		36,028,334	10.58%	7,996,574	2.89%	28,031,760	43.87%
White Alone or in combination	246,315,825	75.04%	204,127,052			69.75%		72.85%	205,521,494	76.30%	36,270,144	58.00%	-4,524,187	-1.84%	1,394,442	0.68%	-5,918,629	
Black Alone or in combination	46,781,254	14.25%	44,385,986			3.96%		14.23%	44,451,046	16.50%	2,792,564	4.47%	462,356	0.99%	65,060	0.08%	397,296	
Amind Alone or in combination	5,647,378		4,261,996			2.29%	8,731,293	2.63%	5,617,271	2.09%	3,114,022	4.98%	3,083,915	54.61%	1,355,275	31.80%	1,728,640	
Asian Alone or in combination	22,387,801	6.82%	21,633,319		754,482	1.25%		7.10%	22,556,570	8.37%	1,002,654	1.60%	1,171,423	5.23%	923,251	4.27%	248,172	
Native Hawaiian or Pacific Islander		0.000.7	==,000,0=0	0.007.1	101,102					0.017	_,,		_,,_,		0 = 0, = 0 =			
Alone or in combination	1,413,892	0.43%	1,192,009	0.45%	221,883	0.37%	1,530,615	0.46%	1,277,897	0.47%	252,718	0.40%	116,723	8.26%	85,888	7.21%	30,835	13.90%
Some Other Alone or in combination	18,141,077	5.53%	1,192,282	0.45%	16,948,795	28.02%	53,859,181	16.23%	5,364,940	1.99%	48,494,241	77.55%	35,718,104	196.89%	4,172,658	349.97%	31,545,446	186.12%
	2010 Census Estimates					2020 Census Estimate						Differences						
	Total	Percent	Non Hisp	Percent	Hispanic	Percent	Total	Percent	Non Hisp	Percent	Hispanic	Percent	Total Change	Percent	Non Hisp	Percent	Hispanic	Percent
Total Pop	308,745,538		258,267,944		50,477,594		331,449,281		269,738,882		61,710,399		22,703,743	Change 7.35%	11,470,938	Change 4.44%	11,232,805	Change 22.25%
White Alone	241,937,061	73.71%	197,318,956		44,618,105	73.77%		75.88%	197,924,713	73.48%	53,899,688	86.20%	9,887,340	4.09%	605,757	0.31%	9,281,583	
Black Alone	40,250,635	12.26%	37,922,522			3.85%		13.51%	41,704,372	15.48%	3,121,493	4.99%	4,575,230	11.37%	3,781,850	9.97%	793,380	
Amind Alone	3,739,506		2,263,258			2.44%	4,312,367	1.30%	2,442,729	0.91%	1,869,638	2.99%	572,861	15.32%	179,471	7.93%	393,390	
Asian Alone	15,159,516	4.62%	14,661,516			0.82%		6.06%	19,467,889	7.23%	647,187	1.03%	4,955,560	32.69%	4,806,373	32.78%	149,187	
Native Hawaiian or Pacific Islander			,== ,= =				-, -,-		-, - ,		,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
Alone	674,625	0.21%	497,216	0.19%	177,409	0.29%	847,544	0.26%	616,937	0.23%	230,607	0.37%	172,919	25.63%	119,721	24.08%	53,198	29.99%
Some Other Alone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Multi	6,984,195	2.13%	5,604,476			2.28%	9,524,028	2.87%	7,582,242	2.81%	1,941,786	3.11%	2,539,833	36.37%	1,977,766	35.29%	562,067	
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Total Races Tallied	316,428,186		264,369,462		52,058,724		341,911,863		277,975,779		63,936,084		25,483,677	8.05%	13,606,317	5.15%	11,877,360	22.82%
White Alone or in combination	248,067,530	75.58%	202,229,636	75.53%	45,837,894	75.78%	260,297,827	78.43%	204,667,809	75.98%	55,630,018	88.96%	12,230,297	4.93%	2,438,173	1.21%	9,792,124	21.36%
Black Alone or in combination	43,213,173	13.17%	40,282,810	15.04%	2,930,363	4.84%	49,193,455	14.82%	45,152,972	16.76%	4,040,483	6.46%	5,980,282	13.84%	4,870,162	12.09%	1,110,120	
Amind Alone or in combination	6,138,482	1.87%	4,041,624			3.47%	7,115,042	2.14%	4,444,654	1.65%	2,670,388	4.27%	976,560	15.91%	403,030	9.97%	573,530	
Asian Alone or in combination	17,676,507	5.39%	16,795,038	6.27%	881,469	1.46%	23,627,673	7.12%	22,442,888	8.33%	1,184,785	1.89%	5,951,166	33.67%	5,647,850	33.63%	303,316	34.41%
Native Hawaiian or Pacific Islander																	ļ	
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Alone or in combination  Some Other Alone or in combination	1,332,494 NA	0.41% NA	1,020,354 NA		312,140 NA	0.52% NA		0.51% NA	1,267,456 NA	0.47% NA	410,410 NA	0.66% NA	345,372 NA	25.92% NA	247,102 NA	24.22% NA	98,270 NA	