

American-Arab Anti-Discrimination Committee
1705 DeSales Street NW Suite 500
Washington DC 20036

April 27, 2018

Submission via email OIRA_Submission@ omb.eop.gov

Lingjun Wang
AD/CVD Operations, Office VII, Enforcement and Compliance
International Trade Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

RE: Comments to the Department of Commerce Proposed Collection to the Office of Management and Budget for 2019 American Community Survey

The American-Arab Anti-Discrimination Committee strongly urges the U.S. Department of Commerce include the Middle Eastern-North African category for collection under the 2019 American Community Survey (ACS). The American-Arab Anti-Discrimination Committee (ADC) is the country's largest grassroots Arab-American organization, serving the Arab American Community for over thirty-five years. ADC is committed to protecting civil rights, promoting mutual understanding, and preserving the Arab cultural heritage. ADC respectfully takes this opportunity to recommend the Department of Commerce consider and implement inclusion of the proposed Middle Eastern or North African (MENA) category in the 2019 American Community Survey (ACS).

ACS requires an accurate count of the nation's population, covering every person in every household. ACS is integral to our democracy because the data collected affects our nation's ability to ensure equal representation and equal access to important governmental and private sector resources for all Americans, across racial and ethnic lines. Census results are used to allocate seats and draw district lines for the United States House of Representatives, state legislatures, and local boards. ACS is used to target more than \$600 billion¹ annually in federal assistance to states, localities, and families; and to guide community decision-making affecting

¹ Reamer, Andrew. "Counting for Dollars: The Role of the Decennial Census in the Geographic Distribution of Federal Funds." GW Institute of Public Policy, 4 June 2017. Available at <http://civilrightsdocs.info/pdf/census/CountingForDollars-Intro.pdf>.

schools, housing, health care services, business investment, and much more. These functions depend on a fair and accurate ACS.

The Census, after its 2015 National Content Test, created a Race and Ethnicity Analysis Report that concluded, “it is optimal to use a dedicated ‘Middle Eastern or North African’ response category.”² Unfortunately, certain population groups — Middle Eastern-North African (MENA), included in the “hard-to-count” populations—are at a higher risk of not being fully counted in the census.³ In past United States censuses, the MENA identity has been listed under the “white” racial category, if at all.⁴ This reality of MENA populations not being fully counted is only exasperated by the Census Bureau current decision to not include collection under the MENA category.⁴ The identified MENA group have been historically underrepresented in the decennial census and ACS for decades, but need to be inclusively counted.

What are the hard-to-count characteristics of the MENA community?⁵

Middle Eastern and North African Americans typically share certain characteristics that compound their risk of being undercounted, including:

- **Language Barriers:** Areas with low rates of English proficiency have historically been undercounted, and more than one in five Arab Americans speaks English less than “very well.”
- **Poverty:** Households in poverty are traditionally hard to count. While the national poverty rate in the U.S is 12.7 percent, more than one-fifth (23.3 percent) of the Arab American community faces poverty.
- **Age:** Young people of color can be hard-to-count, especially young children and young adults. Compared to the general United States population, a higher proportion of Arab Americans are under 5 years old or aged 18-24. In addition, older individuals are more likely to be overcounted,

² Census Bureau, *2015 National Content Test Race and Ethnicity Analysis Report* xiii (Feb. 28, 2017), <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>.

³ “Final Report: National Advisory Committee on Racial, Ethnic, and Other Populations, Administrative Records, Internet, and Hard to Count Population Working Group.” U.S. Census Bureau, July 2016. Available at https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf.

⁴ Census Bureau, <https://www.census.gov/newsroom/press-releases/2017/cb17-tps15.html>; Ali Harb, US Census fails to add MENA category: Arabs to remain 'white' in count, Jan. 27, 2018, <http://www.middleeasteye.net/news/us-census-continue-count-arabs-white-1206288795>.

⁵ “Table S0201: Selected Population Profile in the United States: 2016 American Community Survey 1-Year Estimates.” U.S. Census Bureau, Retrieved 13 December 2017. Available at https://factfinder.census.gov/bkmk/table/1.0/en/ACS/16_1YR/S0201/popgroup~504; Brownrigg et al. “Sociocultural Behaviors Correlated with Census Undercount.” 2003; Fernandez, Shatuck and Noon. Presentation at the Southern Demographic Association Conference, October 2016; Semega, Jessica, Kayla Fontenot, and Melissa Kollar. “Income and Poverty in the United States: 2016.” U.S. Census Bureau, 12 September 2017. Available at <https://www.census.gov/library/publications/2017/demo/p60-259.html>; “Final Report: National Advisory Committee on Racial, Ethnic, and Other Populations, Administrative Records, Internet, and Hard to Count Population Working Group.” U.S. Census Bureau, July 2016. Available at https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf.

but a smaller proportion of Arab Americans are seniors compared to the US population as a whole.

- **Gender:** Men, especially men of color, have a higher undercount rate than women. More than half of the Arab American population (53.8 percent) is male, compared 49.2 percent nationally.
- **Housing Insecurity:** Renters are harder to count because of their relative transitory status and the types of housing in which they live. Almost half of Arab Americans (49.6 percent) are renters compared to 37 percent of the general United States population.

The Department of Commerce and OMB are considering major improvements in how they ask Americans about their race and ethnicity, with the goal of producing more accurate and reliable data in the 2019 ACS and beyond. Recently released Census Bureau related research underscores the fact that many Americans and U.S. persons do not identify completely or accurately with the current racial categories and have recommended using a combined question about race and ethnicity.⁶ This representation of identity in the ACS is shared by persons from the Middle East and North Africa. Middle Eastern and North African responses are currently classification as "White" under the OMB standards is inappropriate. The Middle Eastern category includes Arab Americans whom are not "White." As demonstrated in the Census Bureau's 2010 Alternative Questionnaire Experiment (AQE) focus groups, there is widespread agreement that the classification of Middle Eastern and North African people as "White" is inappropriate.

Census Bureau officials have acknowledged that data accuracy is a problem because to obtain good data, they need to make sure people can match themselves to the choices they are offered. Arab Americans and persons of Middle Eastern and North African origin are not provided an accurate choice for their identity, which inevitability leads to inaccurate and underreported count. Although the full breadth of the MENA community is as yet unknown, there are estimated to be at least 3.7 million Americans of Arab descent in the United States.⁷ Arab Americans comprise approximately 77 percent of the projected MENA population.⁸ Upon

⁶ See Pew Research, Seeking Better Data on Hispanics, Census Bureau May Change How It Asks About Race, <http://www.pewresearch.org/fact-tank/2017/04/20/seeking-better-data-on-hispanics-census-bureau-may-change-how-it-asks-about-race/>

⁷ The Arab American Institute estimates that there are 3.7 million Arab Americans in the U.S., including Iranian and Israeli Americans. Since the American Community Survey does not include these two groups in its "Arab" categorization, its estimate of about 2.8 million Arab Americans covers only 77 percent of the full classification. Authors calculations based on Ibid.; "Demographics." Arab American Institute, Retrieved 2017.; 2016 American Community Survey 1-Year Estimates.

⁸ Goldvale, Casey and Indivar Dutta-Gupta. "Counting Everyone in the Digital Age." The Leadership Conference Education Fund and the Georgetown Center on Poverty and Inequality, 2017. Available at http://www.georgetownpoverty.org/wp-content/uploads/2017/10/LCEF_2020_Census_Poll_Report-Final-002.pdf;

receiving extensive input from the MENA community and observing positive reception and higher data quality when testing the MENA category in 2015, the Census Bureau formally recommended that the MENA category be added to the 2020 Census.⁹ The change in the Census Bureau position in January 2018 contravenes the MENA category testing.¹⁰

The Census Bureau seems to have ignored all its prior research and testing on a MENA classification. NCT research has explored ways to collect and tabulate data for respondents of Middle Eastern or North African (MENA) heritage.¹¹ During the 1990s, as part of the public comment process for the 1997 OMB Standards, OMB received a number of requests to add an ethnicity category for Arabs and Middle Easterners to the minimum collection standards, but OMB encouraged further research on how to collect and improve data on this population. In comparison to the 1990 Census Bureau short form, almost half the questions that sought to capture concise data on race and origin, have been eliminated.¹² The 2010 AQE was part of the research effort on how to collect and improve data for the MENA population, as findings from AQE focus groups revealed that several MENA participants did not see themselves in the current race and ethnicity response categories and focus group participants often recommended a separate Middle Eastern, North African, or Arab category.

The Census Bureau conducted extensive outreach with MENA community leaders and experts over the past several years about the development of a MENA category. In response to a December 2014 Federal Register Notice about the plans for the 2015 NCT, the Census Bureau received thousands of public comments from the MENA community supporting the testing of a MENA category.¹³ The 2016 ACS Test Content and 2015 National Content test further supports

Lowenthal, Terri Ann et al. “Race and Ethnicity in the 2020 Census: Improving Data to Capture a Multiethnic America.” The Leadership Conference Education Fund, November 2014. Available at www.civilrightsdocs.info/pdf/reports/Census-Report-2014-WEB.pdf.

⁹ “Final Report: National Advisory Committee on Racial, Ethnic, and Other Populations, Administrative Records, Internet, and Hard to Count Population Working Group.” U.S. Census Bureau, July 2016. Available at https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf. Goldvale, Casey and Indivar Dutta-Gupta. “Counting Everyone in the Digital Age.” The Leadership Conference Education Fund and the Georgetown Center on Poverty and Inequality, 2017. Available at http://www.georgetownpoverty.org/wp-content/uploads/2017/10/LCEF_2020_Census_Poll_Report-Final-002.pdf; Lowenthal, Terri Ann et al. “Race and Ethnicity in the 2020 Census: Improving Data to Capture a Multiethnic America.” The Leadership Conference Education Fund, November 2014. Available at www.civilrightsdocs.info/pdf/reports/Census-Report-2014-WEB.pdf.

¹⁰ Ali Harb, US Census fails to add MENA category: Arabs to remain ‘white’ in count, Jan. 27, 2018, <http://www.middleeasteye.net/news/us-census-continue-count-arabs-white-1206288795>.

¹¹ Census Bureau, <https://www.census.gov/newsroom/press-releases/2017/cb17-tps15.html>.

¹² Brookings Institute, Why Census is Right to Ask for Racial and Ethnic Data, <https://www.brookings.edu/opinions/why-census-is-right-to-ask-for-racial-and-ethnic-data/>.

¹³ Census Bureau, <https://www.census.gov/newsroom/press-releases/2017/cb17-tps15.html>.

inclusion of the MENA category.¹⁴ The Census, after its 2015 National Content Test, created a Race and Ethnicity Analysis Report that concluded, “it is optimal to use a dedicated ‘Middle Eastern or North African’ response category.”¹⁵

Based on above, ADC strongly encourages the Department of Commerce to include the MENA Category as part of its collection under the 2019 American Community Survey. The Department of Commerce has an opportunity to make sure all persons are accurately counted as part of the American community.

Respectfully,

Yolanda Rondon, Esq.
ADC Senior Staff Attorney

¹⁴ Mathews, Kelly et al. “2015 National Content Test: Race and Ethnicity Analysis Report.” U.S. Census Bureau, 28 February 2017. Available at <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>.

¹⁵ Census Bureau, *2015 National Content Test Race and Ethnicity Analysis Report* xiii (Feb. 28, 2017), <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>.