



December 17, 2018

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

Submitted via <http://www.regulations.gov> (Docket # USBC-2018-0014)

RE: Comments on The American Community Survey

Dear Ms. Jessup,

On behalf of the Arab American Institute (AAI), we are pleased to provide comments in response to the Federal Register notice (the "Notice"). The Notice asks for comments on three issue areas important to Arab Americans and other communities across the country: changing the race and ethnicity question to match the 2020 Census, the reliance on technology in filling out the American Community Survey (ACS), and ways to generally minimize the burden on respondents while maintaining the integrity of the data.

As an organization, AAI seeks to nurture and encourage the direct participation of Arab Americans in political and civic life in the United States. AAI represents the policy and community interests of Arab Americans and strives to promote Arab American participation in the U.S. electoral system. Serving as a central resource to policy makers, the media, political leaders, and community groups on a variety of public policy issues that concern Arab Americans, AAI has been engaged in support of an accurate census count since its founding in 1985. AAI currently hosts the only Census Information Center tasked with dissemination of data about Arab Americans. We have been actively working with the Census Bureau (the Bureau), coalition groups, and a working group that we co-founded and lead, in preparation for the 2020 Census. It has been of mutual interest for AAI and the Bureau to find the best way to ensure a fair and accurate count for Arab Americans and other MENA populations for the upcoming Census.

AAI views the ACS as an important part of maintaining accurate data on Arab Americans. Considering the decennial is every 10 years, the ACS provides more timely insight and updated data that can be used to understand various communities in the United States. Further, given the ACS asks questions not on the decennial census, for many, including Arab Americans. It is the only source of data about our communities.

To improve the quality of the data on the ACS, AAI would urge the Bureau to include the tested combined question format, which would result in the implementation of the MENA category.

The combined question format was introduced with the intention of providing more granular and accurate data across all racial and ethnic groups. Research done by the Bureau found that “the strategy to combine the race and Hispanic origin questions into one item resulted in dramatically lower item nonresponse compared to the separate race and Hispanic origin questions.”¹ The addition of the combined question allows for granular data about race and ethnicity in the United States while increasing the likelihood of valid responses on the form because of the plurality of options presented to individuals across the country. The *2015 National Content Test: Race and Ethnicity Analysis Report* showed that the combined question format allowed for reliability in responses and allowed for diversity in responses by individuals who identify with more than one race or ethnicity.² It is within this combined question format that a MENA category could be included to ensure a more accurate count.

AAI supports the inclusion of a distinct MENA category, as the Arab American community, one of several benefiting from the addition of a MENA category, has long suffered from a census undercount. This undercounting of members of our community has resulted in a lack of data to accurately assess community needs, possible denial of government services, and the potential of political underrepresentation. The lack of access to basic services and rights can range from language assistance at polling places to greater access to health information and research. During the 1997 review of federal standards to measure race and ethnicity in the United States, the Office of Management and Budget (OMB) concluded that further research was needed on an Arab or Middle Eastern ethnic category.³ Since then, AAI has been working closely with the Bureau to explore ways to better reach, enumerate, and study these growing and complex population groups. It was field testing done on the National Content Test that showed the benefits of adding a MENA category in efforts to get more accurate census data.⁴ As it currently stands the Arab American community is severely undercounted. Federal statistics estimate there are 1.96 million Arab Americans living in the United States, a gross underestimate of the community. Research done by AAI suggests a more accurate estimate is around 3.66 million Arab Americans.⁵

While it was reassuring that research from the Bureau supported the addition of a MENA category to address an undercount, AAI was not provided with a credible rationale as to why the category

¹ United States. Department of Commerce. Census Bureau. *2010 CENSUS PLANNING MEMORANDA SERIES*. By Burton Reist. 2nd ed. Vol. 211. Washington, DC: Census Bureau, 2013. 1-151.

https://www.census.gov/2010census/pdf/2010_Census_Race_HO_AQE.pdf

² United States. Department of Commerce. Census Bureau. *2015 National Content Test Race and Ethnicity Analysis Report*. By Kelly Mathews. 1st ed. Washington, DC: Census Bureau, 2017.

<https://apps.npr.org/documents/document.html?id=4316468-2015nct-Race-Ethnicity-Analysis>.

³ "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity." U.S. Census Bureau. October 30, 1997. <https://www.whitehouse.gov/wp-content/uploads/2017/11/Revisions-to-the-Standards-for-the-Classification-of-Federal-Data-on-Race-and-Ethnicity-October30-1997.pdf>.

⁴ United States. Census Bureau. National Advisory Committee on Racial, Ethnic and Other Populations. *National Advisory Committee on Racial, Ethnic and Other Populations Fall Meeting Notes*. Suitland, MD: Census Bureau, 2016. 1-11. <https://www2.census.gov/cac/nac/meetings/2016-11/2017-03-29-census-response.pdf>.

⁵ Arab American Institute. "National Demographic Profile 2014." National Demographic Profile 2014. 2014. https://d3n8a8pro7vnm.cloudfront.net/aaai/pages/9843/attachments/original/1460668240/National_Demographic_Profile_2014.pdf?1460668240.

was not being implemented for 2020, contrary to prior planning and testing. Through a request pursuant to the Freedom of Information Act, AAI obtained documents from OMB, yet none of the documents provide an explanation for the MENA category's omission. The omission of the MENA category, which was tested and proven to be beneficial to ensure an accurate count, generates concern among stakeholders, who do not understand why the Bureau is not moving forward with a tested category that would improve the count. Though the MENA category might not be included on the decennial Census, AAI still finds that this addition would lead to much more accurate data, more accurate than that was obtained during the Census enumeration.

Since the Bureau did not move forward with the addition of the MENA category, the ACS is the only place that Arab Americans and other communities within the MENA designation would be able to get data on our communities. As it currently stands, the ACS is the only way that Arab Americans are able to get any understanding of the increase in population, the diversity within the community, and the growth of the population. Through the ACS we are able to get a snapshot of various aspects of parts of the Arab American community—from levels of educational attainment, employment, and income levels we are able to see how to better inform our efforts to assist all Arab Americans in their daily lives. Data attained by the ACS gives us the only insight into the diversity of the Arab American community, their needs, and the growth patterns of the community. It is vital to organizations like AAI who rely on the ACS to get better quality data about the community to ensure that the ACS continues to ask and collect data on ancestry that is then made available to the public through data tools like American Fact Finder.

As a community-based organization with a long-held vested interest in accurate federal data, we are troubled by the various ways that this data has been put at stake for our community. Actions that compromise the accurate, constitutionally mandated collection of data will harm communities across the country, including Arab Americans. It is imperative that federal officials act at this time to (1) add a MENA category, (2) continue asking about ancestry and (3) work to ensure the integrity of Census Bureau data and ensure all people are counted. These recommendations will uphold the commitment of the Census Bureau to gather accurate data that can be used as a snapshot for the larger American public through the American Community Survey.

Thank you for the opportunity to comment on the upcoming Census and for taking these concerns seriously. If you have any further questions about the comments provided here, please feel free to contact Suher Adi at 202-429-9210 or sadi@aaiusa.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maya Berry', with a stylized flourish at the end.

Maya Berry
Executive Director