

COMMUNITY DRAFT COMMENT- FRN DEADLINE OF APRIL 27, 2023

Mr. Bob Sivinski
Chair, Interagency Technical Working Group on Race and Ethnicity Standards
1650 17th Street NW
Washington, DC 20500

Re: Document ID OMB-2023-0001-0001, Federal Register Number 2023-01635, Document Citation 88 FR 5375, Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards

Dear Mr. Sivinski:

I write in response to Federal Register Notice 88 FR 5375, OMB-2023-0001 published on January 27, 2023. As an Arab American, I support the Office of Management and Budget (OMB) updating Statistical Policy Directive No. 15: Standards for Maintaining, Collecting and Presenting Federal Data on Race and Ethnicity (SPD 15). I was also pleased to see that the initial proposal of the Federal Interagency Technical Working Group on Race and Ethnicity Standards (Working Group) contains support for a combined question and a distinct Middle Eastern or North African (MENA) category.

Specifically, I submit my comment in support of the addition of MENA as a minimum reporting ethnic category as part of a combined race and ethnicity question.

1) I Support a MENA Ethnic Category.

According to the American Community Survey (ACS) data, Arab Americans make up the largest percentage of people captured by the MENA category. As an Arab American, I am proud of the rich culture, history, and diversity in our community. I also understand that the best method to secure an accurate count of my community is to create a distinct minimum reporting MENA ethnic category where I can check a MENA checkbox and identify my ethnicity or national origin and any race I may identify with. With this, I will finally be seen in the data as an Arab American so that my rights are fully protected, and my representation is fully secure. Importantly, to properly collect accurate data about people from the MENA region in general and Arab Americans in particular, the MENA category must be an ethnic category as people from MENA can be of any race.

An inclusive, comprehensive geographical definition of the MENA category should be adopted and includes persons with origins in the League of Arab States (Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen), Non-Arab MENA states (Iran, Israel, and Turkey), and Trans-national communities (Assyrians/Chaldeans, Kurds, Amazigh).

However, I do not believe that the proposed nationality and ethnic group examples provided in the Working Group's initial proposal adequately represent the MENA category. The examples listed should follow the approach the Census Bureau typically adopts and reflect the largest groups that would ultimately be represented in the federal data. As such, guidelines should be issued for the collection of detailed MENA ethnicity data that treat the MENA region as one diverse geographical area and that sub-boxes be assigned to the largest groups by population in the U.S. (e.g., Lebanese, Iranian, Egyptian), while also using examples that include a Trans-national group (e.g., Armenian, Assyrian/Chaldean), a Gulf population (e.g., Iraqi, Yemeni) and an Arabic-speaking country in Sub-Saharan Africa (e.g., Somalia, Sudan).

2) I Support the Combined Question Format.

I strongly support the inclusion of the combined question format as the Working Group has proposed. Prior research by the Census Bureau has shown that the combined question format and a MENA category elicited higher response rates and more accurate collection for different communities, including Arab Americans. Federal forms can be confusing for respondents to fill out accurately and the combined question format is a welcomed approach to streamlining this process for our community members.

3) I Support Increased Reporting on Race and Ethnicity.

Data collection, disaggregation, and reporting are central to understanding and meeting community needs. Arab Americans for years have relied on our independent research to attempt to understand the different health needs of the community, poverty levels, education levels, and immigration trends. Community-based organizations that provide direct services to Arab American communities across the country have done their incredible work without the benefit of accurate data about the very communities they serve. The decennial census is the most far-reaching data collection of Americans and our community's invisibility in years past has made it difficult to understand the needs we face. Accurate and detailed data about Arab Americans will help serve our community for generations to come.

Thank you for your attention to this very important topic. I am thrilled to see that the MENA ethnic category will finally be created, allowing Arab Americans a category to self-identify with so that we have the data we need about our community.

Sincerely,