January 10, 2025

The Honorable Robert L. Santos
Director
United States Census Bureau
4600 Silver Hill Road
Hillcrest Heights, MD 20746

Docket Number: 241112-0289; RTID 0607-XC079
RE: The Census Bureau's Proposed Race/Ethnicity Code List for the American Community Survey and the 2030 Census

Dear Director Santos,

The Center for American Progress (CAP) is submitting these comments in response to a proposed race/ethnicity code list that will be used on the American Community Survey (ACS) and the 2030 Census. CAP is an independent, nonpartisan policy institute that is dedicated to improving the lives of all Americans through bold, progressive ideas, as well as strong leadership and concerted action. For more than two decades CAP has provided the public with evidence-based research and analysis.[1] In order to accomplish that mission, CAP relies upon publicly available data, including U.S. Census Bureau data, to shape and inform our recommendations. The ability to analyze disaggregated racial and ethnic data is integral to achieving our mission and making evidence-based policy recommendations.

These recommendations have informed the decisions of policymakers from state and local governments, federal agencies, Congress, and the White House, effectuating change for all Americans. CAP is not alone in using these disaggregated racial and ethnic data products in our research; think tanks, academia, advocates, and other policy organizations across the United States use detailed demographic data to answer questions for policymakers about the communities they serve. Policymakers have diverse constituencies that are often unable to see themselves in aggregated data, even at the regional category level. If this disaggregated data were published by the Census Bureau, it would provide more flexibility for a wide range of users to produce their own analyses of the racial and ethnic populations they serve. This comment seeks to answer the questions posed in section four of the request, and we appreciate the opportunity to provide input for your consideration.

How do you use the data produced for regional categories from the 2020 Census?

CAP uses a variety of data to produce policy proposals, evaluate the effects of policy change, and identify problems facing various communities, regions, and demographic groups. For example, CAP regularly produces analyses of the

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[1] Center for American Progress, "About us," available at https://www.americanprogress.org/about-us/ (last accessed December 2024).

gaps in pay facing women by age, race, ethnicity, and work hours using ASEC and ACS data, which uses census data on regional race and ethnicity categories to create the racial code list.[2] Similarly, CAP regularly produces disaggregated data analysis of Asian American, Native Hawaiian, and Pacific Islander (AANHPI) womens' wage gaps using ACS 1-year data.[3]

CAP analysis finds that when these groups are aggregated into regional categories, it can mask the inequality between different ethnic subgroups of AANHPI people, particularly women, in education, wages, occupational segregation, and other labor market characteristics such as hours and participation.[4] The ability to produce detailed race and ethnicity estimates allows CAP and similar organizations to produce evidence-based recommendations to policymakers that are targeted to community-specific needs.

How would removing regional categories from the code list and tabulated products impact your ability to use the detailed race/ethnicity data?

Prior CAP work has documented the evolving concepts of race and ethnicity in the Census, and the effects of these changes on the census' accuracy capturing certain racial and ethnic subgroups. Including detailed groups in the code list is important to prevent undercounting among people from diasporic or multiracial backgrounds, such as Afro-Latino or Afro-Caribbean people.[5] Having an accurate count is not only essential for CAP or any other organization to make any estimates with the race/ethnicity data that allow us to analyze the equity of various policies and programs, but it is crucial for policymakers who want to understand the racial and ethnic diversity at a local level.

This disaggregated data can allow policymakers to create culturally competent programming for their communities, whether that is providing services in native languages for certain constituencies or ensuring public health agencies are aware of the ethnoreligious preferences in care for minority populations at a local level. Without an accurate count of these populations, policymakers may not be aware of the needs or challenges of those communities.

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[2] Amina Khalique, "What You Should Know About the 2023 Gender Wage Gap" (Washington, DC: Center for American Progress, 2024), available at
https://www.americanprogress.org/article/what-you-should-know-about-the-2023-gender-wage-gap/.
[3] Ibid.
[4] Marina Zhavoronkova, Rose Khattar, and Matthew Brady, "Occupational Segregation in America" (Washington, D.C.: Center for American Progress, 2022), available at
https://www.americanprogress.org/article/occupational-segregation-in-america/;
 Kaitlin Holmes and Shilpa Phadke, "Asian American and Pacific Islander Women in the U.S. Economy" (Washington, D.C.: Center for American Progress, 2016), available at
https://www.americanprogress.org/article/asian-american-and-pacific-islander-women-in-the-u-s-economy/;
Robin Bleiweis, Jocelyn Frye, and Rose Khattar, "Women of Color and the Wage Gap" (Washington, D.C.: Center for American Progress, 2021), available at
https://www.americanprogress.org/article/women-of-color-and-the-wage-gap/.
[5] Farah Z. Ahmad and Jamal Hagler, "The Evolution of Race and Ethnicity Classifications in the Decennial Census", (Washington, D.C.: Center for American Progress, 2015), available at
https://www.americanprogress.org/article/the-evolution-of-race-and-ethnicity-classifications-in-the-decennial-census/;
Farah Z. Ahmad and Jamal Hagler, "Infographic: Government Collection of Race and Ethnicity Data", (Washington, D.C.: Center for American Progress, 2015), available at
https://www.americanprogress.org/article/infographic-government-collection-of-race-and-ethnicity-data/.

Furthermore, removing the regional categories would allow researchers to better group individuals for intended analysis. In the instance of East Asians, for example, the ability to break apart or group together Chinese and Taiwanese individuals for various analyses can be helpful given the historical relationships between these two countries that have resulted in different economic and health outcomes, but also cultural and racial/ethnic identities among the population.[6] The same can be said for people of Hmong ethnicity who are more likely to have lower incomes and work in certain occupations than other groups.[7]

In some cases, the regional and aggregated data has led researchers on high-profile court cases to perpetuate racial and ethnic stereotypes that are not true for the vast majority of the population when the disaggregated data are presented. For example, CAP analysis showed that a commonly held false narrative about Asian Americans was used by the plaintiffs in the *Students for Fair Admissions v. Harvard* case about Asian Americans as a "model minority." CAP analysis of disaggregated educational attainment and racial/ethnic data showed that educational attainment varied widely across Asian ethnic groups, with Vietnamese and Hmong people having the lowest rates of educational attainment across the ethnic subgroups of the Asian population.[8]

Would the ability to create your own regional categories using disaggregated data be useful to your work?

In short, yes. Creating disaggregated analyses using census microdata is time-consuming and limited to researchers with specific skill sets. However, should the Census Bureau produce these disaggregated statistics, it would open the door for more researchers to use the data for unique purposes while allowing for more robust research outcomes. For those who advocate for particular subpopulations, having those data at their fingertips to produce evidence-driven recommendations empowers them to address their community's needs. At CAP, it would allow us to produce more accurate analysis of particular racial and ethnic groups in less time; and enable us to better respond to time pressure to provide policy solutions and analysis to inform the public and policymakers.

Census data is critical to understanding the American public, and access to more detailed information would shed light on greater nuance to the benefit of research organizations like CAP as well as academics, advocates, and policymakers at all levels of government. We hope our perspective makes clear that we can not only collect and access census data but that we also have the ability to create our own regional categories using disaggregated data, as they are vital tools in providing evidence to understand disparities that exist within the population. These data ultimately contribute to pushing for policy change in our country's political process. As seen in the CAP studies

[6] Christine Huang and Kelsey Jo Starr, "Most people in Taiwan see themselves as primarily Taiwanese; few say they're primarily Chinese" (Washington, D.C.: Pew Research Center, 2024), available at https://www.pewresearch.org/short-reads/2024/01/16/most-people-in-taiwan-see-themselves-as-primarily-taiwanese-few-say-theyre-primarily-chinese/.

[7] Kaitlin Holmes and Shilpa Phadke, "Asian American and Pacific Islander Women in the U.S. Economy" (Washington, D.C.: Center for American Progress, 2016), available at https://www.americanprogress.org/article/asian-american-and-pacific-islander-women-in-the-u-s-economy/; Robin Bleiweis, Jocelyn Frye, and Rose Khattar, "Women of Color and the Wage Gap" (Washington, D.C.: Center for American Progress, 2021), available at https://www.americanprogress.org/article/women-of-color-and-the-wage-gap/.

[8] Sylvia Guan, "Gaps in the Debate About Asian Americans and Affirmative Action at Harvard" (Washington, D.C.: Center for American Progress, 2018), available at https://www.americanprogress.org/article/gaps-debate-asian-americans-affirmative-action-harvard/.

cited throughout this letter, most disparities affect women, people of color, and people with disabilities[9], and these studies provide evidence of this because our researchers have used regional data to come to such deductions.

We appreciate your consideration of these recommendations for the proposed changes to the census. If you have any questions about these recommendations, please contact Mariam Rashid at mrashid@americanprogress.org.

Sincerely,

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[9]Arohi Pathak, " In the wealthiest country in the world, no one should be hungry" (Washington, D.C.: Center for American Progress, 2022), available at
https://www.americanprogress.org/article/in-the-wealthiest-country-in-the-world-no-one-should-be-hungry/.