



POLICY BRIEF

The Hispanic Origin and Race Questions in Census 2020

Making the Best of Missed Opportunities and a Flawed Approach

DECEMBER 2019

The Importance of Accurate Census Data for the Latino Community

The accuracy of the data collected by the Census Bureau on the nation's population, and on its racial, ethnic and national origin groups, helps ensure our nation's future prosperity and well-being. These data guide a wide range of decisions made in the public and private sectors that affect the lives of Latinos and all American families and their children. The data help ensure fair and representative reapportionment and redistricting for Latino communities. Census data play an indispensable role in revealing persistent disparities rooted in historic discrimination premised on race and ethnicity, and enabling efforts to eliminate those disparities. They are used to allocate more than \$1.5 trillion in federal, state and local funding.¹

Latinos are the nation's second largest population group, and one of its fastest growing communities. Latinos account for more than one of every six U.S. residents, and one of every four of the country's population under 18. For the Census Bureau to compile the most accurate data possible about the U.S. population, it must ensure a full and accurate count of the Latino community.

For Census data to present an accurate portrait of our Latino population, they must reflect the on-going evolution of Americans' racial and ethnic identity. This brief will first provide the history of the evolution of the Census question on Hispanic origin. It will then address the Office of Management and Budget's (OMB) standards for data collection on race and ethnicity, and the Census Bureau's research to improve the accuracy of these data and its proposal to change the format of the Hispanic origin and race questions for the 2020 Census and the American Community Survey. The brief will describe the Department of Commerce's ultimate decision regarding the format of the questions for Census 2020, and the issues that format raises, including the missed opportunity to significantly improve the quality of data collected in the next decennial enumeration. Finally, the brief will present policy recommendations for the federal government to obtain more complete data that more accurately reflect the evolving racial and Hispanic origin identity of our nation's residents.

¹ Andrew Reamer, *Counting for Dollars 2020: The Role of Decennial Census in the Geographic Distribution of Federal Funds*, George Washington Institute of Public Policy, George Washington University, November 2019 at <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/Counting%20for%20Dollars%202020%20Brief%207A%20-%20Comprehensive%20Accounting.pdf>

The Evolution of the Census Question on Hispanic Origin

Since its inception in 1790, the Census form collected information about the race of American residents, starting by differentiating between free persons and slaves. The Census added more detailed categorizations of African Americans, and categories for Native Americans and different Asian population groups, but it was not until 1930 that the form used by enumerators who went door-to-door included a “Mexican” category.² The Bureau eliminated the separate “Mexican” category from subsequent decennial Censuses, until 1970, when the Bureau first added a question about Hispanic origin to one of the Census forms sent to a sample of the population. The question asked respondents to indicate whether their origin or descent was one of six different categories: “Mexican,” “Puerto Rican,” “Cuban,” “Central or South American,” “other Spanish,” or “No, none of these.” (Figure 1)

FIGURE 1
1970 Census Hispanic Origin Question

b. Is this person's origin or descent— *(Fill one circle)*

<input type="radio"/> Mexican	<input type="radio"/> Central or South American
<input type="radio"/> Puerto Rican	<input type="radio"/> Other Spanish
<input type="radio"/> Cuban	<input type="radio"/> No, none of these

Source: U.S. Census Bureau

In the 1980 Census, the Bureau asked the Hispanic origin question on the form sent to all of the residents of the nation, and the question added the term “Spanish/Hispanic” before the words “origin or descent.” The Bureau moved the “No” response to the first choice in the categories, and dropped the “Central or South American” choice (in the 1970 Census, some respondents living in the central or southern regions of the United States mistakenly marked this category). (Figure 2)

FIGURE 2
1980 Census Hispanic Origin Question

<p>7. Is this person of Spanish/Hispanic origin or descent?</p> <p><i>Fill one circle.</i></p>	<p><input type="radio"/> No (not Spanish/Hispanic)</p> <p><input type="radio"/> Yes, Mexican, Mexican-Amer., Chicano</p> <p><input type="radio"/> Yes, Puerto Rican</p> <p><input type="radio"/> Yes, Cuban</p> <p><input type="radio"/> Yes, other Spanish/Hispanic</p>
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Source: U.S. Census Bureau

² D’Vera Cohn, *Census History, Counting Hispanics*, Pew Hispanic Center, March 3, 2010, at <https://www.pewsocialtrends.org/2010/03/03/census-history-counting-hispanics-2/>

The addition of the Census question on Hispanic origin to the 1970 and 1980 questionnaires resulted from several factors. In part, policymakers were responding to growing civil rights activism among the nation's Mexican American and Puerto Rican communities. There was also a growing recognition that the experiences of what some policymakers called the "Spanish Speaking" communities of the nation were different from those of European immigrants, and that data on the demographic characteristics of these communities would help address economic, educational and other disadvantages. Policymakers and advocates also supported more fair and effective allocation of government resources to the Latino population. Businesses which targeted Latino customers, such as Spanish-language media, supported the compilation of data which would help them better understand their markets.³

In 1990, the Census form dropped the word "descent," from the question, and for the "other Spanish/Hispanic" category choice, and instructed respondents to print one specific subgroup for that choice. The form offered examples of groups that could be printed, such as Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran or Spaniard. (Figure 3)

FIGURE 3
1990 Census Hispanic Origin Question

<p>7. Is this person of Spanish/Hispanic origin? Fill ONE circle for each person.</p> <p>If Yes, other Spanish/Hispanic, print one group. _____ →</p>	<ul style="list-style-type: none"> <input type="radio"/> No (not Spanish/Hispanic) <input type="radio"/> Yes, Mexican, Mexican-Am., Chicano <input checked="" type="radio"/> Yes, Puerto Rican <input type="radio"/> Yes, Cuban <input type="radio"/> Yes, other Spanish/Hispanic (Print one group, for example: Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.) ↗ <div style="border: 1px dashed black; width: 100%; height: 20px; margin-top: 5px;"></div>
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Source: U.S. Census Bureau

³ An interesting discussion of the interactions between government officials, policymakers, advocates and the Spanish-language media which contributed to the development of the Census question on Hispanic origin appears in G. Cristina Mora, *Making Hispanics: How Activists, Bureaucrats & Media Constructed a New American*, The University of Chicago Press, 2014.

In 2000, the question dropped the word “origin,” and added the word “Latino,” so that the question became “Is this person Spanish/Hispanic/Latino?” The question instructions clarified that respondents should both answer both the question on Hispanic origin and the subsequent question on race. However, the question also removed the examples of subgroups that could be written in for the “other Spanish/Hispanic/Latino” choice – these examples had been included in 1990. (Figure 4)

FIGURE 4
2000 Census Hispanic Origin Question

→ **NOTE: Please answer BOTH Questions 7 and 8.**

7. Is Person 1 Spanish/Hispanic/Latino? Mark the “No” box if **not** Spanish/Hispanic/Latino.

<input type="checkbox"/> No, not Spanish/Hispanic/Latino	<input type="checkbox"/> Yes, Puerto Rican
<input type="checkbox"/> Yes, Mexican, Mexican Am., Chicano	<input type="checkbox"/> Yes, Cuban
<input type="checkbox"/> Yes, other Spanish/Hispanic/Latino — <i>Print group.</i> ↗	

Source: U.S. Census Bureau

Analysts believe that the omission of the examples resulted in a miscount of Latino sub-groups such as Salvadorans, Guatemalans, Dominicans and Colombians. A NALEO Educational Fund analysis found that Census data indicated that the Central American population in the City of Los Angeles declined between 1990 and 2000, despite significant influxes of Salvadoran and Guatemalan migration during the decade. This analysis also revealed that the 2000 Census appeared to understate the number of Colombian and Dominican residents in New York City. In contrast, in both cities there was a dramatic growth in the generic “Other Hispanic” category between 1990 and 2000, suggesting that the lack of examples led respondents to not indicate or write in a Hispanic sub-group in the Other Hispanic response option.

In the 2010 Census, the question on Hispanic origin was also preceded by an explicit instruction to answer both of the questions on Hispanic origin and race, and included the statement “For this Census, Hispanic origins are not races.” The Bureau added back the examples of different Hispanic subgroups, with the instructions to print a specific subgroup for the other Hispanic, Latino or Spanish origin response category. (Figure 5)

FIGURE 5
2010 Census Hispanic Origin Question

→ **NOTE: Please answer BOTH Question 8 about Hispanic origin and Question 9 about race. For this census, Hispanic origins are not races.**

8. Is Person 1 of Hispanic, Latino, or Spanish origin?

No, not of Hispanic, Latino, or Spanish origin

Yes, Mexican, Mexican Am., Chicano

Yes, Puerto Rican

Yes, Cuban

Yes, another Hispanic, Latino, or Spanish origin — *Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.* ↴

Source: U.S. Census Bureau

The Office of Management and Budget Federal Data Standards

As the Bureau proceeded with its collection of data on race and ethnicity, it did so in accordance with standards for federal data established by the OMB. In 1977, an OMB Directive authorized the use of the term “Hispanic” for official use.⁴ It also adopted an approach of requiring race to be measured separately from ethnic background, with racial categories set forth separately from two ethnic backgrounds: “of Hispanic origin” and “not of Hispanic origin”. In its 1997 revision of its classification of its standards (hereinafter the “1997 Standards”), the OMB again endorsed this approach, with two ethnicity categories - Latino, or not Latino - and five separate minimum race categories – generally White, Black, American Indian/Alaska Native, Asian, or Native Hawaiian/Pacific Islander. Subsequently, the 2000 and 2010 decennial Censuses employed a “two separate question” approach to obtaining responses on Hispanic origin and race. Questionnaires first asked individuals to indicate whether or not they were of Hispanic origin, then, in a separate question, to indicate their race. Respondents were provided five general race categories: White; Black; American Indian or Alaska Native; a selection of nine specific large Asian and Native Hawaiian or Pacific Islander subgroups, with two additional write-in boxes for “Other Asian” and “Other Pacific Islander; and “Some other race.” Respondents could also select one or more race for the first time.

⁴ National Research Council (US) Panel on Hispanics in the United States; Marta Tienda and Faith Mitchell, editors. *Multiple Origins, Uncertain Destinies, Hispanics and the American Future*, National Academies Press, 2006 at <https://www.ncbi.nlm.nih.gov/books/NBK19811/>.

Rising Concerns about Race and Ethnicity Question Formats

In 2014, OMB initiated a new review process to consider changes to the 1997 Standards. The action was motivated by the Census Bureau's experiences fielding surveys using the "two separate question" format. Particularly as it processed the results of the 2010 decennial Census, the Bureau recognized a growing mismatch between the specific categories set forth in the race question and the ways in which many Latinos expressed their racial and ethnic background. The Bureau consistently found that Latinos accounted for majorities of people who did not report themselves as belonging to any of the specific race categories. For example, more than 43% of Latinos chose "Some other race" or did not answer the race question on the 2010 decennial Census. Of those who chose "Some other race" and wrote in the race with which they identified, an overwhelming majority answered "Mexican," "Hispanic," "Latin American," or "Puerto Rican," which suggests they did not identify with the specific racial groups set forth in the question and considered their Hispanic identity as their racial background.

The relatively high number of Latinos not identifying with the specific racial categories set forth in the Census question presented a major challenge for the consistency of Census data with race and ethnic categories established by the OMB. Because the OMB minimum race categories do not include "Some other race," the Bureau developed a procedure to assign an OMB race to those checking "Some other race" in response to the Census question. The Bureau found itself applying this imperfect procedure to impute the characteristics of growing numbers of residents. Between 2000 and 2010, the population classified as "Some other race" grew by one-quarter. By 2010, 6% of all decennial Census respondents – 19.1 million people – identified themselves as "Some other race," and 97% of those 19.1 million individuals were Latino. Latinos aged 18 to 44 were statistically more likely than their older counterparts to answer "Some other race" or to provide no answer to a separate Census question about race. These observations led the Census Bureau to project that by 2020, "Some other race" could become the second largest racial group reported, a racial category considered non-existent by OMB.

OMB's review also aimed to investigate methods of collecting more accurate detailed data about national origins and sub-groups. For example, the separate question format employed in the 2010 decennial Census did not accommodate the reporting of multiple national Hispanic origins by respondents of Latino ethnicity, resulting in the loss of detailed information about Latino identities. In response to a differently-formatted ethnicity question on the 2000 decennial Census, the Bureau observed that more than 260,000 respondents attempted to report multiple Latino national origins, and that such reporting was most common among respondents under the age of 35, portending future increases in the percentages of Latinos identifying as being of more than one Latino national origin.

The Census Bureau's Research on the Hispanic Origin and Race Questions

For more than a decade, the Bureau undertook extensive research to improve the reporting of Hispanic origin and race in the ACS and the decennial Census. The Bureau also intended the research to inform and guide OMB's reconsideration of its standards. For example, in the Bureau embedded an unprecedentedly large experiment in the 2010 decennial Census. The Bureau mailed out questionnaires with several different experimental variations in the design strategies for the Hispanic origin and race questions, and also conducted interviews and focus groups with respondents.

Among its key findings, the Bureau determined that a significant percentage of Latinos struggled to answer a separate question about race, and were not necessarily satisfied with the response options offered to them. Many of these individuals did not embrace or express any identity other than that stemming from their Latino and specific national origin heritage – in other words, Latino was equivalent to these individuals’ “race.” In addition, the Census Bureau’s research raised concerns that some non-Hispanics were not responding to the separate Hispanic origin question because they did not feel it applied to them or believed they had answered the question when responding to the question on race.

The Bureau also evaluated race and ethnicity question formats during its 2015 National Content Test (NCT). This testing secured lower nonresponse rates to a format which combined the Hispanic origin category with racial categories than to separate questions. “Some other race” responses also declined dramatically when a combined question was substituted for separate race and ethnicity questions. Instead, majorities of Latinos given the option on a combined question form self-identified solely in the Latino/Hispanic category and not with any of the other specific race groups.

At the same time, the rates at which Latinos marked one or more races in addition to Latino ethnicity did not change appreciably regardless of question format. Use of a combined question format in test surveys did not result in the loss of any necessary data that would have been collected with separate questions. For example, the Census Bureau did not find any statistically significant differences in the rates at which respondents indicated Afro-Latino identity whether they were responding to separate or combined questions. Similarly, the percentage of people who self-identified as both Latino and White in a combined question - about 15% of all Latinos - was consistent with the percentage of Latinos who affirmed their White identity in a post-survey interview associated with questionnaires that employed separate questions.

The Bureau also found that when checkboxes and optional write-in areas immediately followed broad race and ethnicity categories, the combined question was, in most cases, as effective as separate questions in prompting survey respondents to provide detailed information about their national origins and ethnicities. These results held whether respondents participated in the survey in paper form or online, as well as whether they responded in English or Spanish.⁵

In addition, the Bureau’s testing found that providing Latinos with an opportunity to indicate multiple sub-group origins produced more detailed and complete data on the Latino community. Because of the consistency and quality of the findings of the Census Bureau’s research on the combined question format, that format provided Latinos with an opportunity to indicate multiple origins.

⁵ While Census 2020 will be the first decennial enumeration where residents can respond online, the Bureau did use its content testing to explore how different question designs performed for respondents utilizing different response modes, including paper, the Internet, smartphones and telephone response.

NALEO Educational Fund provided stakeholders an opportunity to discuss the foregoing research with government officials in national convenings held in July 2014 and March 2017. In May 2017, NALEO Educational Fund endorsed the Census Bureau’s recommendation that future questionnaires use that revised format; the input the organization received from stakeholders from its national convenings helped inform the endorsement. (Figure 6)

FIGURE 6

Proposed 2020 Census Combined Race and Hispanic Origin Question

8. Which categories describe Person 1?
Mark all boxes that apply AND print details in the spaces below.
Note, you may report more than one group.

WHITE – Provide details below.

German Irish English
 Italian Polish French

Print, for example, Scottish, Norwegian, Dutch, etc. ↴

HISPANIC, LATINO, OR SPANISH – Provide details below.

Mexican or Mexican American Puerto Rican Cuban
 Salvadoran Dominican Colombian

Print, for example, Guatemalan, Spaniard, Ecuadorian, etc. ↴

BLACK OR AFRICAN AM. – Provide details below.

African American Jamaican Haitian
 Nigerian Ethiopian Somali

Print, for example, Ghanaian, South African, Barbadian, etc. ↴

ASIAN – Provide details below.

Chinese Filipino Asian Indian
 Vietnamese Korean Japanese

Print, for example, Pakistani, Cambodian, Hmong, etc. ↴

AMERICAN INDIAN OR ALASKA NATIVE – Provide details below.

American Indian Alaska Native Central or South American Indian

Print, for example, Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat, Nome Eskimo Community, etc. ↴

MIDDLE EASTERN OR NORTH AFRICAN – Provide details below.

Lebanese Iranian Egyptian
 Syrian Moroccan Algerian

Print, for example, Israeli, Iraqi, Tunisian, etc. ↴

NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER – Provide details below.

Native Hawaiian Samoan Chamorro
 Tongan Fijian Marshallese

Print, for example, Palauan, Tahitian, Chuukese, etc. ↴

SOME OTHER RACE, ETHNICITY, OR ORIGIN – Print below. ↴

Source: U.S. Census Bureau

Results of the OMB Review Process

While the Census Bureau conducted these tests and analyzed results, OMB convened an Interagency Working Group composed of representatives from ten cabinet departments and three other agencies engaged in the collection or use of Federal race and ethnicity data, to review relevant research and make recommendations to OMB around potential revisions to the Standards for Maintaining, Collecting, and Presenting federal Data on Race and Ethnicity. This Working Group identified four proposals that it felt deserved consideration: use of a single, combined question about race and ethnicity; inclusion of Middle Eastern/North African reporting option; revision of the description of the intended use of standard minimum reporting categories; and updates to terminology used in race and ethnicity questions, such as deletion of the term “Negro.”

The Interagency Working Group issued two Federal Register notices seeking comment in 2016 and 2017, and an Interim Report in 2017, concerning its inquiry and preliminary conclusions. In its second Federal Register notice, published on March 1, 2017 at 82 FR 12242, the Interagency Working Group stated its intention to announce final decisions about changes to the Standards by mid-2017. However, OMB did not release any additional publications or other final decisions during calendar year 2017, in spite of the fact that the Census Bureau sought final determinations before the end of 2017 so that any changes could be incorporated into materials to be used in its 2018 “End-to-End” test in Providence County, Rhode Island (the “End-to-End” test was a limited real-time “dry-run” simulation – or “Dress Rehearsal” – of major operational components of the decennial Census, intended to assess the Bureau’s readiness for Census 2020).

Ultimately, the Interagency Working Group did not release a final report, and the determinations review process begun in 2014 appears to have become dormant or terminated without any formal statement or explanation. The first public indication that the OMB would not revise the 1997 Standards came when the Bureau announced that it would not be using the combined question approach for the 2018 End-to-End Test, and instead would use the separate question approach to maintain consistency with the 1997 Standards – this essentially signaled that the Bureau would not be able to use the approach it had initially planned for. Ultimately, on March 29, 2018, the Bureau submitted to Congress the questions to be used in Census 2020. The Hispanic origin and race questions had relatively modest changes from 2010, and the questions were consistent with the two separate question approach mandated by the 1997 Standards, which remained in force. As a result, for Census 2020, the Bureau must use a format which its own extensive research indicates elicits incomplete and inaccurate data about the nation’s racial and ethnic identification.

Changes Made to 2020 Census Race and Hispanic Origin Questions from Census 2010

In Census 2020, the Census Bureau will continue to ask two separate questions, one about Hispanic origin and one about race. In theory, this format enables the Bureau to produce data that categorize every individual by both membership in one or more of five standard racial groups, and either Latino or non-Latino ethnicity. Principal choices for responding to both separate questions will remain unchanged, and no “Middle Eastern/North African” category will be offered. (Figure 7)

FIGURE 7

Final Version of Hispanic Origin and Race Questions for Census 2020

→ NOTE: Please answer BOTH Question 8 about Hispanic origin and Question 9 about race. For this census, Hispanic origins are not races.

8. Is Person 1 of Hispanic, Latino, or Spanish origin?

- No, not of Hispanic, Latino, or Spanish origin
- Yes, Mexican, Mexican Am., Chicano
- Yes, Puerto Rican
- Yes, Cuban
- Yes, another Hispanic, Latino, or Spanish origin – *Print, for example, Salvadoran, Dominican, Colombian, Guatemalan, Spaniard, Ecuadorian, etc.* ↴

9. What is Person 1's race?

Mark one or more boxes **AND** print origins.

- White – *Print, for example, German, Irish, English, Italian, Lebanese, Egyptian, etc.* ↴

- Black or African Am. – *Print, for example, African American, Jamaican, Haitian, Nigerian, Ethiopian, Somali, etc.* ↴

- American Indian or Alaska Native – *Print name of enrolled or principal tribe(s), for example, Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, etc.* ↴

- | | | |
|--|-------------------------------------|--|
| <input type="checkbox"/> Chinese | <input type="checkbox"/> Vietnamese | <input type="checkbox"/> Native Hawaiian |
| <input checked="" type="checkbox"/> Filipino | <input type="checkbox"/> Korean | <input type="checkbox"/> Samoan |
| <input checked="" type="checkbox"/> Asian Indian | <input type="checkbox"/> Japanese | <input type="checkbox"/> Chamorro |
| <input checked="" type="checkbox"/> Other Asian – <i>Print, for example, Pakistani, Cambodian, Hmong, etc.</i> ↴ | | <input type="checkbox"/> Other Pacific Islander – <i>Print, for example, Tongan, Fijian, Marshallese, etc.</i> ↴ |

- Some other race – *Print race or origin.* ↴

Source: U.S. Census Bureau

The Census Bureau did adopt three modifications for the 2020 Census questionnaire that amend the race and ethnicity questions on the 2010 Census. The form will also list several national origin examples for “White” and “Black or African American” categories under the race question, and will incorporate write-in boxes that ask people whose race is White or Black to provide more detailed information about their heritage. Census questionnaires have previously asked Native American respondents to provide tribal affiliations and will continue to do so, but going forward, forms will list specific examples to guide respondents in completing the question. Finally, the term “Negro” will be removed in recognition of its declining use.

One of the confusing results of the OMB’s failure to revise its standards and the Bureau’s subsequent decision to continue to use the separate question approach is that the Bureau retained one component of the format for the Hispanic origin question that its initial testing proved effective in the 2018 End-to-End Test – the question in that test instructed respondents who self-identified as Latino to choose one or more national origins or subgroups associated with their Latino identity. (Figure 8)

FIGURE 8
Hispanic Origin Question Used in 2018 End-to-End Test

8. Is Person 1 of Hispanic, Latino, or Spanish origin?
Mark one or more boxes **AND** print origins.

- No, not of Hispanic, Latino, or Spanish origin
- Yes, Mexican, Mexican Am., Chicano
- Yes, Puerto Rican
- Yes, Cuban
- Yes, another Hispanic, Latino, or Spanish origin – *Print, for example, Salvadoran, Dominican, Colombian, Guatemalan, Spaniard, Ecuadorian, etc.* ↴

Source: U.S. Census Bureau

However, the final decennial questionnaire submitted to Congress omitted any such instructions regarding how many choices respondents could or should mark in response to the Latino origin question. The Bureau subsequently said it had determined that accepting more than one response to this question might produce responses not in compliance with the 1997 Standards; thus, it could not include instructions to mark more than one response. The Bureau does not expect to report data on individuals who self-identify in the 2020 Census as being of multiple Latino national origins or subgroups, consistent with its practice during past decennial cycles. Even if respondents indicate more than one Latino national origin or subgroup, the Bureau will choose one Hispanic origin to use in reporting the aggregated data.

Outstanding Questions for the Census Bureau and OMB

While the Bureau's determinations for the 2020 questionnaire are final, the lack of a formal or public conclusion to the Interagency Working Group review process leaves us with outstanding questions about the format the Bureau will employ in 2020 for collecting race and ethnicity data, as well as the future of the 1997 Standards. In addition, we are concerned about the Bureau's failure to clearly and timely inform the public of the change adopted to its ethnicity question between finalization of the proposed 2018 questionnaire and submission to Congress of the 2020 questionnaire. Shifts in the Bureau's and OMB's positions and decisions on race and ethnicity data collection have confused stakeholders, creating the risk that they will disseminate inaccurate information to survey respondents. In addition, the Bureau and other government officials spent years and extensive resources conducting testing and analysis to promulgate recommendations, followed by the pointless failure of the OMB to revise the 1997 Standards, which prevented the recommendations from moving forward.

Detailed National Origin Responses and the Race Categories:

Although the Bureau may collect more detailed information about individuals' race and ethnicity in 2020 than it has in past decennial Census cycles, we are also concerned that Latinos who self-identify as "White" or "Black or African American" may not provide detailed national origin responses under those categories. The option to do so has not previously been offered and may not be well understood, particularly in light of the fact that the planned format of these new response options differs from the format of responses to the Hispanic ethnicity question: "White" and "Black or African American" choices are followed by lists of examples and an empty write-in box, while the Hispanic origin question provides several specific choices next to checkboxes, followed by an empty write-in box. Moreover, neither "White" nor "Black or African American" illustrative examples include any national origins or subgroups commonly associated with Latino identity, such as Dominican or Cuban, which for some Latinos may correspond with Black or African American.

The Growth of the "Some Other Race" Population:

If, as the Bureau anticipates, respondents make "some other race" the second most frequently chosen race category on the 2020 Census, the agency will face an increasingly difficult challenge because of its obligation under the 1997 OMB Standards to report each person in one or more of the five principal race categories. Its practices and determinations around assignment of a most likely race or races to people who mark themselves as "some other race" will have weighty consequences for the next decade, and as it has gained experience conducting these imputations, the Bureau's methods should have advanced in quality and accuracy. We are unsure whether or how social science in this area has advanced, however, and are concerned that the Bureau may not have conducted as much experimentation and study around this important task as it has devoted to examination of alternative formats for questions about race and ethnicity.

Considering the expanded opportunities that 2020 question formats will offer for respondents to indicate membership in multiple national origin and tribal sub-groups under major racial categories, the Bureau is likely to collect information about individuals' backgrounds that may be very complex. Accurately representing racial and ethnic identity may be more difficult when many individuals provide more granular details about their heritage than they previously have given. The Census Bureau must decide how much detailed information it can feasibly make available in various products and publications, and we urge it to strive to provide as much precise data as possible, and to clearly communicate its plans to stakeholders.

Recommendations for Future Research and Policy

OMB's failure to revise the 1997 Standards and the Bureau's subsequent retention of the two separate question approach represent a missed opportunity to significantly improve the collection of data of Hispanic origin and race. This is particularly salient because the Bureau will also retain the two separate question approach for the 2020 American Community Survey, the "rolling survey" of our nation's population which provides updated data on a wide range of demographic and housing characteristics. It is extremely troubling that the two separate question approach will be retained after the Bureau's extensive research indicated that a combined Hispanic origin and race question that requests detailed information from respondents, including the opportunity for respondents to indicate multiple Hispanic national origin and sub-group identifications, elicits the most complete and accurate data possible about respondents' identification.

NALEO Educational Fund is acutely aware, and concerned about the consequences, of the growing and unaddressed disparities between the ways in which United States residents describe their identities, and the categories they are asked to use to describe themselves on Census questionnaires. We do not know what conclusions the Interagency Working Group reached about this issue, nor what recommendations it might have made around topics that may have merited additional research. Therefore, we do not consider the matters taken up for consideration by the Interagency Working Group to be successfully or finally resolved, and we are disappointed that the responsible agencies have failed to make appropriate use of the significant resources expended upon testing by squandering this opportunity to adopt much-needed innovations. Because we remain confident that the Census Bureau can obtain optimally detailed and accurate race and ethnicity information from Latinos using a single question about race and ethnicity, we believe it is imperative that OMB further update its Standards to improve the quality of crucial federal data about residents' race and ethnicity. The Commerce Department and the Census Bureau must communicate with the OMB the critical need for the adoption of this update. In addition, the OMB and the Bureau must communicate clearly with stakeholders about the potential for pursuing this update, and whether or not they plan to conduct any additional tests or studies on the Hispanic origin and race questions.

The Importance of Census 2020 Outreach

It is also critical that the Census Bureau conduct and help coordinate robust outreach during Census 2020 to ensure that Latinos and all residents understand the modest changes adopted to race and Hispanic origin questions, and continue to provide responses to those questions that are no less complete and detailed than in past decennial Censuses. This outreach should emphasize that respondents should answer questions in the manner they feel best reflects their self-identification. It should also highlight the fact that respondents can choose to mark more than one racial category, and multiple national origins or subgroups under the racial categories. The need for robust outreach is particularly important in light of the confusion and fear that still remains among many Latinos in the wake of the debate about the addition of the untested and unnecessary citizenship question to the questionnaire. Community education which combines information about the importance of participating in Census 2020 with clear and accessible information about the content of the questionnaire will help ensure that all of our nation's residents respond to Census 2020, and do so in a manner that produces accurate and complete data.

For more information about the NALEO Educational Fund's Census policy development efforts, please contact **Ms. Rosalind Gold**, rgold@naleo.org or (213) 747-7606; or **Ms. Angela Manso**, amanso@naleo.org or (202) 546-2536.