

# 2022 Asian American, Native Hawaiian, and Pacific Islander (AA and NHPI) Roadmap for Data Equity in Federal Agencies

May 23, 2022

*AAPI Data, in partnership with  
National Council of Asian Pacific Americans (NCAPA)*



# TABLE OF CONTENTS

<b>Executive Summary</b>	<b>3</b>
<b>Introduction</b>	<b>4</b>
<b>What is Data Equity?</b>	<b>9</b>
<b>Functional approaches to data equity</b>	<b>9</b>
<b>Process approaches to data equity</b>	<b>10</b>
<b>Role of the Office of Management and Budget in Data Equity</b>	<b>13</b>
<b>Prior AA and NHPI Community and Researcher Efforts</b>	<b>15</b>
<b>Community advocacy and engagement efforts with federal agencies</b>	<b>17</b>
Census Bureau	17
Health and Human Services	19
Education	20
Housing	21
Hate Crimes, Discrimination and Criminal Justice	21
Cross-Sector	23
<b>Prior Interagency Government Efforts</b>	<b>25</b>
<b>Current State of Data Equity at Federal Agencies</b>	<b>27</b>
<b>Interagency Efforts</b>	<b>28</b>
Equitable Data Working Group and WHIAANHPI	28
Office of Management and Budget	30
<b>Census Bureau</b>	<b>31</b>
Design and Development	32
Compilation, Processing, and Analysis	33
Dissemination and engagement	33
<b>Health and Human Services</b>	<b>35</b>
<b>Bureau of Labor Statistics</b>	<b>35</b>
<b>Department of Justice</b>	<b>36</b>
<b>Department of Education</b>	<b>38</b>
<b>Housing and Urban Development (HUD)</b>	<b>38</b>
<b>Consumer Financial Protection Bureau</b>	<b>39</b>
<b>Social Security Administration</b>	<b>39</b>
<b>Equal Employment Opportunity Commission</b>	<b>40</b>
<b>Recommendations and Next Steps</b>	<b>42</b>
<b>Terminology and Glossary</b>	<b>45</b>
<b>Federal agencies</b>	<b>45</b>
<b>Community organizations</b>	<b>45</b>
<b>Race and ethnicity categories</b>	<b>46</b>
<b>Endnotes</b>	<b>47</b>

---

# EXECUTIVE SUMMARY

This is the first in a series of reports from AAPI Data and the National Council of Asian Pacific Americans (NCAPA) pertaining to data equity as it pertains to Asian American, Native Hawaiian, and Pacific Islander (AA and NHPI) communities. This report is a scan of publicly available information, supplemented with correspondence with community organization leaders, on past activities and current plans to advance data equity for AANHPI communities at the federal level.

The report first defines what data equity means for our communities, researchers, and federal government agencies. Next, it provides a brief review of some recent data equity initiatives from AA and NHPI community organizations and researchers. The third section of the report covers the interagency work of prior presidential administrations that sought to advance data equity for AAs and NHPIs. The report also lays out the current state of data equity efforts at federal agencies that collect data on issues most relevant to AA and NHPI communities, establishing a baseline of knowledge to inform the next steps and future engagement with those agencies.

Finally, the report concludes with a series of recommendations that aim to achieve large-scale impact, through the framework of “DNA: Data, Narrative, Action.” These recommendations are informed by past and ongoing efforts initiated by Asian American and Native Hawaiian and Pacific Islander organizations and researchers, as well as related efforts to advance data equity initiated by federal agencies.

Moving forward, it is clear that our communities’ agenda with respect to data equity can be characterized as “disaggregation plus,” meaning that improved federal standards for data collection by detailed origins remain a high priority, but that the focus has expanded to include other important aspects of data equity such as timeliness, accessibility, human-centered design, community inclusion, and federal agency recognition of subject-matter expertise and population expertise among community organizations and researchers alike.

---

# INTRODUCTION

The U.S. Census Bureau projects that the majority of the American population by 2045 will be people of color and that, by 2030, immigration will become the primary source of population growth in the United States due to the aging of the native-born population. With migration from Asian and Pacific Islander countries and territories constituting significant drivers of this population growth, and in order to help elevate the stories, narratives, and needs of our communities, it is vital that elected leaders, policymakers, stakeholders, and community members work together to design and produce research on Asian American, Native Hawaiian, and Pacific Islander (AA and NHPI) populations that are accessible, timely, and accurate.

While many public and private agencies and programs continue to group Asian Americans, Native Hawaiians, and Pacific Islanders into one super-category, major differences in cultural traditions, group histories, and modes of incorporation into the United States make it imperative for data pertaining to these communities to be collected, analyzed, and disseminated in a disaggregated fashion, and presented back to AA and NHPI communities in ways that are culturally appropriate and widely accessible.

Federal agencies continue to operate under the 1997 Office of Management and Budget standards for Classification of Federal Data on Race and Ethnicity, where agencies are required to collect and report data for five minimum race categories: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Agencies are also required to have two categories for data on ethnicity: Hispanic or Latino, and Not Hispanic or Latino.

In order to better understand why data disaggregation by detailed origin is essential for AA and NHPI communities, we need to understand the diverse and varied histories of how Asians, Native Hawaiians, and Pacific Islanders came to be a part of the fabric of the United States. Migration, adaptation, integration, and backlash are all common themes in most histories of these diverse communities.

For Asians, the push and pull factors that drove migration to the United States were often a combination of economic and political turmoil at home and the promises of economic opportunity and mobility that America represented at the time. Chinese immigrants, facing unrest and famine during the Taiping Rebellion, arrived in large numbers in the middle of the 19th Century as laborers, first drawn by the gold rush in California, later by jobs building the first transcontinental railroad and the economies that emerged around the railroad. While initially praised for their work ethic, the number of Chinese immigrants grew and dispersed to other jobs and industries. With increasing numbers, they were seen as unwanted competitors for jobs for

white laborers. Dehumanizing racial stereotypes of Chinese immigrants combined with the economic pressures of the depression triggered by the Panic of 1873 resulted in violent backlash against Chinese communities and culminated in the Chinese Exclusion Act of 1882, the nation's first racial exclusion act. Despite these restrictions, Chinese migrants continued to seek entry into the United States, creating America's first undocumented immigrants. In addition, there were always a small number of exceptions to Chinese exclusion, including students and refugees.

With Chinese immigrants explicitly banned, the demand for cheap labor for American agriculture and business needed another source. Each succeeding wave, first Japanese, then Indian, and finally Filipinos, continued the cycle of American commercial interests recruiting Asian laborers, increasing resentment and racial bias against these new communities, and ultimately bans on immigration and restrictions on citizenship and property ownership.

The Gentleman's Agreement of 1907-08 was a diplomatic arrangement in which the Japanese government agreed to limit Japanese migration to the United States, particularly of male laborers. However, family migration was still permitted, resulting in the continued growth of the Japanese community through family reunification and the migration of so-called "picture brides" from Japan to the United States. Japan's emergence as a world power forced the United States to pursue a diplomatic agreement rather than a legislative ban. Nevertheless, immigration was reduced and bans on naturalization and prohibitions of property ownership remained in place. For other Asians, particularly Indians, these restrictions came with the Immigration Act of 1917 which created a barred zone of immigration from British India through Southeast Asia. Chinese exclusion had been made permanent in 1904 and Korea, which by 1917 was under Japanese occupation, was covered by the Gentleman's Agreement.

That left Filipinos as the last Asian source of cheap labor for American agriculture and business interests. Because of the Philippines' status as a U.S. colony, Filipinos could freely migrate to America as U.S. nationals. However, this ended with the Philippine Independence Act of 1934, where the Philippines were granted independence after a 10-year transition period, but Filipinos were no longer considered U.S. nationals, and Filipinos in the U.S. lost their status.

The start of World War II resulted in a re-evaluation of naturalization and immigration from Asia. While China and the U.S. were wartime allies, bans on Chinese immigration became untenable and President Roosevelt signed a law in December 1943 ending Chinese exclusion, although extremely small national quotas made the policy change largely symbolic. In addition, Chinese residents were finally allowed to naturalize, the first Asian-origin groups to be allowed the opportunity to do so. At the same time, Roosevelt had signed Executive Order 9066 in February

1942 that forced the internment of Japanese Americans living in the U.S. mainland for the duration of the war. Other Asian communities also were allowed to immigrate and naturalize shortly after the end of World War II, as Cold War pressures prompted the United States to portray itself as a more welcoming nation. Still, restrictive quotas remained in place and fewer than 150 nationals were allowed to immigrate to the United States each year. Finally, the Immigration and Nationality Act of 1965 opened Asian immigration by lifting national quotas and creating three streams of immigration that form the core of today's immigration system: employment-based, family-based, and refugees/asylees. The act finally removed racist immigration barriers for Asians and resulted in the massive growth of the Asian American population that continues to this day. However, political and economic conditions continue to periodically feed a violent backlash against Asian Americans. One key moment in Asian American activism is the murder of Vincent Chin in 1982 during a time when the American automobile industry was struggling with workers blaming Japanese manufacturers for putting them out of work. Violence directed at Asian Americans during times of turmoil continues to this day, including years of violence against South Asians and Muslims after 9/11 and the recent growth of attacks on Asian Americans, Native Hawaiians and Pacific Islanders during the COVID-19 pandemic, with East Asians primarily feeling the brunt of violent attacks.

U.S. intervention in Southeast Asia and the impact of the Vietnam War, the Khmer Rouge genocide, and the Secret War in Laos resulted in the resettlement of over 1.5 million of Southeast Asian refugees between 1975 and 2000 from Vietnam, Laos and Cambodia. The trauma associated with war, genocide, political persecution and being uprooted from ancestral homes has resulted in great need for social and mental health services for refugees. The lack of disaggregated data on Asian Americans is the most harmful to refugee communities as their needs and challenges are often overlooked and hidden. In the early 2000's, a new wave of refugees from Bhutan, Myanmar (Burma), another wave of Hmong refugees from Thailand, and, most recently, Afghanistan were resettled across the country, often in metro areas with declining populations.

Finally, the Immigration Act of 1990 introduced three new immigration streams: Diversity Visas, H1-B employment visas, and Temporary Protected Status (TPS). The Diversity Visa program was especially important for growing the Bangladeshi and Pakistani immigrant populations in the United States. The Diversity Visa is a lottery-based program open to residents of any territory that had sent less than 50,000 employment- or family-based immigrants to the U.S. in the previous five years. Successful applicants receive permanent residency status for themselves and any spouse or children. The Diversity Visa program has especially boosted immigration from Bangladesh, Nepal, and Uzbekistan, with about 40,000 visas issued for each

country since 1995. After these new immigrants settled in and established themselves, they were able to sponsor family members, leading to significant proportional increases in particular communities such as Bangladeshi Americans in New York and Michigan. In fact, migration from Bangladesh is now high enough that Bangladeshis are now ineligible for the Diversity Visa program. The H1-B visa programs accelerated immigration from India and China, bringing in highly skilled science and technology workers to the United States.<sup>1</sup> The majority of the foreign-born Asian American population in the U.S. have arrived since the introduction of the H1B visa program and this program has had a major influence on the economic status of the Asian American population as a whole. Finally, TPS allows the Department of Homeland Security to designate a country for TPS when conditions in the country prevent a safe return. TPS provides protection from removal, and authorization for employment and travel. TPS has enabled many Nepali to remain in the U.S. after the devastating earthquake in Nepal in 2015 and be active contributors to the economy as Nepal slowly recovers.

Native Hawaiians and Pacific Islanders share different histories and cultural heritage from Asian American populations, with the colonial, territorial, and military expansion of the United States playing a key role in their community formation, including a negative impact on economic security. Different historical circumstances have resulted in a complex system of formal and informal relationships between the Pacific Island nations and the United States.

After initial European contact in 1778, Hawaii's location in the Pacific made the country a center for explorers, whalers, and eventually the sugar industry. America's growing imperial ambitions at the end of the 19th Century would eventually lead to the overthrow of the Hawaiian monarchy and the U.S. annexation of the Hawaiian Islands. The U.S. military presence in Hawaii and the frequent shipping associated with supporting the military and trade with the mainland created opportunities for migration that many Native Hawaiians took. As U.S. citizens, Native Hawaiians are able to work and live anywhere in the U.S. legally, qualify for public benefits, vote in local and federal elections, and serve in the U.S. military.

Further colonial annexations have resulted in the Chamorro people having U.S. citizenship. The ancestral homelands of the Chamorros came under U.S. control first with Guam after the Spanish American War and then with the Northern Marianas Islands after Japan's defeat in 1945. Since that time the Northern Mariana Islands have entered into a commonwealth status with the United States while Guam remains a territory. As such, Chamorros can live and work legally in the United States, qualify for public benefits, and serve in the U.S. military. But as a territory, residents of Guam and the Northern Marianas are unable to vote in federal elections and have only non-voting delegates in Congress.

After the Tripartite Convention of 1899 divided the Samoan Islands into two, with Germany claiming the western islands and the U.S. the eastern island, the United States formally annexed American Samoa as a territory. However, because Congress has not passed an Organic Act for American Samoa, American Samoans are considered U.S. nationals and do not have birthright citizenship. American Samoans can live and work legally in the U.S., serve in the U.S. military, and qualify for most federal benefits, but cannot vote while residing in the mainland. They must apply for naturalization to obtain all the rights and benefits of citizenship.

Other Pacific Islands would fall under U.S. hegemony during and after World War II. Citizens of the Federated States of Micronesia, Republic of the Marshall Islands, and Republic of Palau fall under three Compacts of Free Association, which confers the right to live and work in the U.S. as “non-immigrants” but are not eligible for most federal benefits and again must naturalize to gain access to all rights and benefits as citizens. The Compacts of Free Association are set to expire in 2023 for Micronesia and the Marshall Islands, and 2024 for Palau, and are currently being renegotiated.

Finally, people from the remaining Pacific Island nations are treated as any other immigrants and must apply for legal permanent residency in order to live and work in the U.S. These nations include Papua New Guinea, Solomon Islands, Nauru, Vanuatu, New Caledonia, Aoteroa, Tuvalu, Fiji, Tokelau, Samoa, Tonga, Nuie, Kiribati, and Cook Islands and make up the majority of the Pacific, but are fewer in number in the U.S.<sup>2</sup>

Having high quality data—by which we mean detailed, accurate, timely, and precise information that includes quantitative and qualitative data collections—will enable AA and NHPI communities to address various barriers associated with immigration-related experiences and statuses, language and other abilities, and the exercise of rights and access to benefits. High-quality data is also valuable to present accurate narratives about our communities, which includes not only combating negative stereotypes that propagate social division and harm, but also highlighting the immense contributions of Asian Americans, Native Hawaiians, and Pacific Islanders to American society. Finally, high-quality data is essential to identifying opportunities to build coalitions across a variety of racial and ethnic groups, to identify common solutions to shared challenges.



# WHAT IS DATA EQUITY?

Data equity can be defined in several ways. As we elaborate below, data equity can be defined with a focus on its function or purpose, as a means to achieving the larger goal of racial equity, as well as with a focus on its process, involving several component parts. The former approach tends to answer the question of why we need more equitable data collections, while the latter approach tends to focus on the question of how data equity can be operationalized, with important roles for government agencies, community organizations, researchers, and the general public.

---

## FUNCTIONAL APPROACHES TO DATA EQUITY

The federal government, through the April 2022 publication of a report by the Equitable Data Working Group, co-chaired by the White House Office of Science and Technology Policy (OSTP) and the Office of Management and Budget (OMB),<sup>3</sup> notes that equitable data “are those that allow for rigorous assessment of the extent to which government programs and policies yield consistently fair, just, and impartial treatment of all individuals. Equitable data illuminate opportunities for targeted actions that will result in demonstrably improved outcomes for underserved communities.”<sup>4</sup> This is a *functional definition of data equity* that tends to focus on the motivational question of *why* data equity is important in the first place—as a critical means to achieve equity. This functional definition focuses on the ways in which data is used by policymakers and decision makers to allocate resources and take actions that demonstrably advance equity more generally (i.e., improving outcomes for underserved communities).

Asian American, Native Hawaiian, and Pacific Islander communities have been operating under some version of this functional definition of data equity for decades, including advocacy surrounding federal guidance on the collection of detailed ethnicity data in 1977 (as we detail later in this report) and the creation of the Asian-Pacific Islander racial category for the 1980 Census.<sup>5</sup> Advocacy for data collections by detailed Asian and Pacific Islander origins has continued since the 1970s—in fields ranging from education and health to housing and labor force participation—as AA and NHPI organizations have consistently highlighted the need for timely, detailed, and accurate data that can inform better decision making, policy development, and policy implementation.

---

## PROCESS APPROACHES TO DATA EQUITY

Having long ago established the need for *why* data equity is essential to AA and NHPI communities, many community organizations and researchers have recently begun to dig deeper into matters of process, of answering the question of *how* we can produce more equitable data collections. In a letter written jointly by several AA and NHPI community organizations and researchers and submitted to Susan Rice, director of the White House Domestic Policy Council in September 2021,<sup>6</sup> the community/researcher coalition laid out a definition of data equity that included expanding federal minimum standards for data collection across all relevant agencies, and creating pilot programs or incentivizing agencies to expand their current data collection categories for AA and NHPIs beyond the newly created federal minimum standard.

### **Deeper dive into process: Data collection standards**

Uniform data collection standards are an important condition for data equity for AA and NHPI communities. These standards include:

- Separate collection categories for self-reporting Asian, Native Hawaiian, and Pacific Islander populations
- Expanded collections categories for gender identity, including women and gender expansive individuals
- Implementing the American Community Survey practice of collecting information on nativity, including the country of birth of the individual and each parent
- Galvanize Diverse Partnerships Across Levels of Government and the Research Community
- Facilitate multiple self-identification responses for race and ethnicity to allow individuals to fully express their identities. This is especially important for Native Hawaiian, American Indian and Alaska Native communities where more than half of those communities identify as multiracial

Beyond expanded data collection standards, the group also defined data equity as the inclusion and incorporation of community and research expertise into all stages of data and research, including design, development, collection, compilation, processing, analysis, dissemination, and preservation, concepts that we elaborate further below.

- **Design and development** - During this stage of the research life cycle, decisions are made regarding what kinds of questions are to be answered, how those questions will be asked, and who are the people being studied. Language and cultural considerations need to be incorporated into design plans. Establishing an advisory committee made up of trusted members of the relevant communities is a best practice.
- **Collection and compilation** - The collection phase requires researchers to minimize the burden of participation and to reassure the subjects of the research that the information they provide will be protected and be used to benefit themselves and their communities. If possible, having individuals from the community participating in the collection and compilation of the data is ideal.
- **Processing and analysis** - Once the data is collected, the data needs to be processed in a way that both protects the confidentiality of the respondents and produces usable, accurate and timely data for the benefit of the communities involved. Researchers must consider how data is presented and have communities provide guidance on how to interpret the results. Researchers also must be clear about what the limitations of the data are.
- **Dissemination and preservation** - Data must be shared back to the communities that were studied in a format that is informative, easily understandable, and easy to access and maintain. Again user feedback on data dissemination tools or data formats is essential to maintain transparency.

When considering how to incorporate communities into data-related processes, it is important to also carefully weigh the benefits and risks to different communities associated with the data collection, analysis, and dissemination, to have those communities actively provide input in decision-making around maximizing benefits and minimizing risks, and to work with communities to ensure that ultimate goal of providing useful and accurate data back to community stakeholders is achieved.

### **Deeper dive into purpose: Recommendations of the EDWG**

At the federal level, the collection of racial and ethnic data is essential for the functioning of the government, from enforcing the Voting Rights Acts to determining how federal funds are allocated to states, neighborhoods and communities. The Equitable Data Working Group charged by President Biden through the Executive Order 13985, on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (“Equity EO”), has issued a set of recommendations for best practices for federal agencies to improve data equity:

- Make Disaggregated Data the Norm While Protecting Privacy
- Catalyze Existing Federal Infrastructure to Leverage Underused Data
- Build Capacity of Robust Equity Assessment for Policy making and Program Implementation
- Galvanize Diverse Partnerships Across Levels of Government and the Research Community
- Be Accountable to the American Public

Overall, the federal government’s functional perspective (or “purpose focus”) on data equity is highly complementary with the process perspective on data equity advanced by community organizations and researchers alike. From the federal government’s perspective, the priority is on understanding which federal policies impact equity outcomes and to use data to identify and remove barriers to equitable access to government programs. From the community perspective, the focus is on the process of how voices and expertise from the community and researchers are incorporated into data processes that will lead to more accurate data and better outcomes for communities.

The focus of the Biden administration on system-wide improvements across the federal government to address equitable data represents an opportunity for AA and NHPI community advocates and leadership to coordinate the wide range of data equity initiatives currently underway.

---

## **ROLE OF THE OFFICE OF MANAGEMENT AND BUDGET IN DATA EQUITY**

The Office of Management and Budget (OMB) plays a central coordinating role for the executive branch, with responsibility for developing and executing the federal budget, managing work across federal agencies, and coordinating and reviewing all significant federal regulations.<sup>7</sup> OMB plays a central role in data equity through its role in setting the minimum standards for data collection for race and ethnicity. While these standards are nominally for only federally-sponsored statistical data collection, the standard has become the de facto standard across all government levels and the private sector because of how data collected at those levels are often required to report back to federal agencies in a format that meets the OMB standards.

Non-federal surveys also make use of Census Bureau population counts and estimates, which adhere to the OMB standards, for designing surveys and sample frames. OMB also plays an oversight role over federal statistical agencies and periodically reviews the performance of agencies. It is through this role and OMB's oversight of the federal budget that policies and standards are enforced.

OMB issued the first Race and Ethnic Standards for Federal Statistics and Administrative Reporting in 1977. Prior to those standards, individual agencies employed inconsistent categories to collect race and ethnic data. Even across decennial censuses, there was considerable variability, especially for Asian categories. For example, the term "Hindu" was used from the 1920 to 1940 Censuses to describe Americans who immigrated from India, despite the fact that not all Indians were Hindus. For the 1950 and 1960 Censuses, both "Hindu" and "Korean" were removed as response options. "Korean" was included as a response option on the 1970 Census and "Asian Indian" as an option made its debut in the 1980 Census.<sup>8</sup>

The 1997 standards required data collection for four racial categories ("White," "Black," "American Indian or Alaskan Native," and "Asian or Pacific Islander"), and a separate ethnic category for Hispanic origin. The standards were created in response to both the increasing need for uniform standards of data collection so that data collected across different federal agencies would be compatible and to meet the requirements of Public Law 94-311 of June 16, 1976 that required federal agencies to

collect, analyze, and publish data on “Americans of Spanish origin or descent.” The rapid growth of the AA and NHPI populations after the immigration reforms of the 1960s also created an urgent need to collect accurate data on these new Americans, especially as the federal government became more reliant on Census and other statistical data to enforce the new Voting Rights and Civil Rights Acts and to allocate funding for federal programs using statistically driven formulas.<sup>9</sup>

By the mid-1990s, there was a growing recognition that the increasing diversity of the Nation would require significant updates to the race and ethnic categories. What emerged from the public process were the 1997 OMB Standards. These standards began to address this diversity through two important changes. First, the standards allowed for survey respondents to select more than one racial or ethnic category. Second, through efforts by Native Hawaiian and Pacific Islander advocates, the standards required that federal statistical agencies at a minimum collect and report data for Native Hawaiian and Pacific Islander communities separate from Asians. Both changes allowed for Native Hawaiians and Pacific Islanders to gain access to more data that better characterizes the unique experiences of their communities. Distinct categories allowed for data to reveal the key differences among Asian, Native Hawaiian and Pacific Islander communities. For example, only 15 percent of individuals who identified in any way as Asian selected multiple race categories, while 70 percent of individuals who identified as Native Hawaiian and 51 percent of individuals who identified as other Pacific Islander opted for multiple race categories.<sup>10</sup>

While the 1997 standards did not require the disaggregation of Native Hawaiian data from Pacific Islander data, there is a growing awareness that key socioeconomic differences between the two groups continue to be obscured by combining the two communities for reporting. Similarly, the wide range of experiences in the Asian American community necessitates further data disaggregation for Asian groups for datasets that cover topics that can reveal those different experiences, such as immigration, English proficiency, languages spoken, education, poverty, etc.

# PRIOR AA AND NHPI COMMUNITY AND RESEARCHER EFFORTS

Differential outcomes and resources within the broad AA and NHPI umbrella go unidentified and unaddressed due to lack of data on Asian Americans, Native Hawaiians, and Pacific Islanders has bound these diverse communities ever since the federal government decided to aggregate them into one category when the first OMB Race and Ethnic Standards for Federal Statistics and Administrative Reporting were issued in 1977. While it may have made sense statistically to combine these populations together to produce stable estimates, the results ended up burying the unique needs and challenges faced by various groups within the categories. There is a throughline going from the 1977 OMB standards that essentially codified AA and NHPI as a unit of analysis to the landmark Heckler Report on Black and Minority Health, with its controversial findings on the health status of AAs and NHPIs that ended up kick-starting AA and NHPI advocacy for data disaggregation and equity at the federal level.<sup>11</sup> The Heckler Report concluded based on aggregated data that AAs and NHPIs had no major health disparities compared to other race and ethnic groups. The aggregate data glossed over the specific health needs of distinct AA and NHPI groups and perpetuated the model minority myth.

Since the OMB standards were first introduced, AA and NHPI advocates and leaders have engaged in the implementation of the standards and advocated for changes to the standards themselves. Asian American community groups and leaders successfully pushed back against an effort to reduce the number of Asian and Pacific Islander categories for the 1990 Census, maintaining the status quo from the 1980 Census. Subsequent censuses have always included initial plans to reduce the number of check boxes for AA and NHPI categories and the AA and NHPI community has always rallied to successfully defend the check boxes. Advocacy around changing the OMB standards centered around two major issues: first, finding a way to collect and report NHPI data so that the needs of the communities under that category are highlighted and not subsumed under Asian American or other larger group data, and second, how to characterize the growing multiracial population and its implications on counting AAs and NHPIs.

The first challenge of where best to categorize NHPI populations was initially constrained during the review of the 1997 OMB Standards by OMB's reluctance to expand the number of major race categories beyond the four established ones:

“American Indian/Alaskan Native”, “Asian or Pacific Islander”, “Black”, and “White”. Even though the OMB standards were clearly minimum standards for data collection, many statistical agencies chose to implement them as the only standards. Therefore, during data collection, there was no way to indicate further detail beyond “Asian or Pacific Islander” and thereby foreclosing the possibility of generating distinct data on NHPIs. For context, at the time of the 1990 Census, Native Hawaiians represented just 3% of the total AA and NHPI category.<sup>12</sup> The Native Hawaiian community initially advocated for Native Hawaiians to be reclassified as American Indian and Alaskan Natives to create an indigenous peoples category. However, concerns were expressed by American Indian tribes over the dilution of their communities’ data and the impact on the special legal and political status of those tribes. Finally, consistent pressure from elected officials from the state of Hawaii, along with a well-organized public campaign to submit public comments to the OMB Federal Register Notice, resulted in OMB relenting and creating a fifth major race category, “Native Hawaiian or Other Pacific Islander.”

The question of how multiracial individuals could express their identity in federal statistics was also a contentious issue. Many Asian American advocates who were looking to build collective power sought to include additional Asian categories on census and survey forms, including multiracial Asian identities, and continue to classify those identities under the existing monoracial, mutually exclusive race construct.<sup>13</sup> However, among multiracial Asians, there was a need for recognition of their complex identities. Some advocated for a new multiracial category separate from the extant race categories because of a history of ostracism by monoethnic Asian Americans and a need to recognize their unique identities and experiences. Others also rejected the monoracial concept of racial identity but wanted to express all parts of their identities and ancestries and did not embrace the concept of a unitary multiracial category. In the end, the various multiracial advocates were able to reach a consensus and opted for instructions to “mark one or more” racial categories.<sup>14</sup>

Research and testing from the Census Bureau at the time showed that for most racial categories only two to 3 percent of the population would select multiple race categories. However, the research also showed that providing a multiple race option would result in more individuals indicating Asian, Native Hawaiian, and American Indian identities. For example, individuals who were both Black and Asian and were forced in the past to choose Black under the single race format were now able to also select Asian. This has subsequently been borne out in the 2000 and subsequent census results with substantially more people able to indicate Asian, Native Hawaiian, and American Indian categories than if they were restricted to single race categories. The 2020 Census results showed that 19,886,049 responded as Asian Alone while an additional 4,114,949 were multiracial Asians who may or may not have



chosen Asian under a single race format. For Native Hawaiian, Pacific Islander, and American Indian populations in particular, multiracial individuals were a larger portion of their populations than single race individuals. For example, in the 2020 Census, 689,966 were monoracial NHPs and 896,497 were multiracial NHPs. In the end both sides of the debate got their data, with the Census Bureau publishing statistics for “Two or more races” and for “Asian American Alone or in Combination with Other Races”.

The updating of standards to include a Native Hawaiian and Pacific Islander category, separate from “Asian,” and OMB guidelines allowing multiple race identification not only improves the specificity and quality of data collection, but also reflects the power of community and research advocacy among Asian Americans and NHPs with regard to data equity.<sup>15</sup>

---

## COMMUNITY ADVOCACY AND ENGAGEMENT EFFORTS WITH FEDERAL AGENCIES

This section of the report summarizes some of the data equity initiatives undertaken by the AA and NHPI community and researchers directed at federal agencies. These initiatives seek to engage with federal agencies and ensure that community and research expertise are brought to bear on the data collection, analysis, and dissemination process. These examples show how AA and NHPI advocates for data equity are digging deep into both functional and procedural challenges to achieving data equity.<sup>16</sup>

### ***Census Bureau***

The Census Bureau through the years has created several different opportunities to engage with external stakeholders and data users to elicit comments and suggestions. Two main advisory committees, the Census Scientific Advisory Committee (CSAC) and the National Advisory Committee on Racial, Ethnic, and Other Populations (NAC). The CSAC primarily advises the Census Bureau on scientific developments that can be applied to any of the Census Bureau’s many programs and activities. The NAC advises the Census Bureau “on the identification of new strategies for improved census operations, survey and data collection methods, including identifying cost-efficient ways to increase census participation and reduce the undercount.”<sup>17</sup> The NAC was created in 2012 by combining the Census Advisory Committee (CAC) on the American Indian and Alaska Native Populations, the CAC on the Asian and Pacific Islander Populations, the CAC on the African American Population, and the CAC on the Hispanic Population. As far back as 1976, AA and

NHPI leaders had engaged with the Census Bureau through a Census Advisory Committee on the Asian and Pacific Americans Population for the 1980 Census.<sup>18</sup>

National Advisory Committee membership through the years has included academic researchers, AA and NHPI advocacy organizations, and business and community leaders. The current NAC is focusing on issues such as: 1) the implementation of differential privacy and its impact on timely release of essential data from the 2020 Census, 2) planning for the 2030 Census including revisiting the race and ethnicity questions for both the decennial census and the American Community Survey, and 3) concerns over declining response rates to the American Community Survey and the need for increased investments in community outreach.

AA and NHPI community organizations also engage the Census Bureau as part of the Federal Register process and other open calls for public comment. Often with major changes in survey methodology or data product design, the Census Bureau engages with a variety of experts and solicits public comments. In the past few years, AA and NHPI community organizations and researchers have responded to such notices as the 2016 review of OMB federal statistical standards, the proposed citizenship question on the 2020 Census, the proposed application of differential privacy to the 2020 Census data product releases, and the proposed Demographic and Housing Characteristics File (DHC) and Detailed Demographic and Housing Characteristics File (Detailed DHC). For example, Advancing Justice-AAJC in partnership with MALDEF issued a report examining the impact of differential privacy on redistricting data for Asian American and Latinos in 2021.<sup>19</sup> Community organizations and researchers, including those at AAPI Data, have also engaged with the Census Bureau on minimizing delays associated with the release of detailed origin data from the 2020 Census.<sup>20</sup> While the Census Bureau released various disaggregated population data tables within one to two years after the April 2010 Census data collection, it did not release a timeline for a similar data release until April 2022 after significant pressure and concerns raised by community organizations and researchers. The Census Bureau currently estimates that it will not be able to release disaggregated population data on Asian Americans, Native Hawaiians and Pacific Islanders until August 2023.<sup>21</sup>

Community partners have also weighed in on Census Bureau outreach plans and provided insights into messaging and motivations in the community. Once the Census went into the field, community partners engaged with the Census Bureau to identify gaps in response rates and to deploy volunteers and resources to encourage communities to participate in the Census. The COVID-19 pandemic showed the importance of local partners grounded in the communities they serve as those organizations could build census messaging into the new pandemic relief programs. For example, food banks and vaccine drives set up by community organizations

would also provide census messaging or even partner with the Census Bureau to have enumerators on-site to get people counted.

Finally, community organizations as well as Census Bureau leaders have recognized the importance of sustaining community partnerships beyond each decennial cycle. In the past, the Census Bureau created national and regional community partnership programs for decennial census outreach and education efforts, and subsequently disbanded most of these networks after the conclusion of the census data collection period.

## **Health and Human Services**

Data on the health status and disparities of AA and NHPI communities was one of the first areas where advocates saw the importance of disaggregated data and successfully sought change. The Asian & Pacific Islander American Health Forum (APIAHF) and the Association of Asian Pacific Community Health Organizations (AAPCHO), both of which emerged out of advocacy efforts in response to the Heckler Report, and their partner organizations have led efforts to increase the research and available data on AA and NHPI health disparities. Through their advocacy efforts, the National Center for Health Statistics began oversampling for Asian respondents in the National Health Interview Survey (NHIS) and the National Health and Nutrition Examination Survey (NHANES), and the revision of the standards for national population health surveys to include 7 additional Asian categories (Asian Indian, Chinese, Filipino, Japanese, Korean, Vietnamese, and Other Asian) and 4 additional Native Hawaiian, and Pacific Islander categories (Native Hawaiian, Guamanian or Chamorro, Samoan, and Other Pacific Islander) beyond the minimum OMB standards, to comply with Section 4302 of the Affordable Care Act.

In 2010, APIAHF released a report, [Native Hawaiian and Pacific Islander Health Disparities](#), that summarized health disparities among Native Hawaiian and Pacific Islander populations. The three main data sources were the federally-sponsored National Health Interview Survey (NHIS), the Behavioral Risk Factor Surveillance System (BRFSS), and the Youth Risk Behavior Survey (YRBS). Most of the data is aggregated at the Native Hawaiian and Pacific Islander level, with some disaggregation provided where possible. The authors also warned that small sample sizes in these surveys yielded less reliable and less precise estimates, highlighting a primary challenge to data equity for NHPI communities.

On the 30th anniversary of the Heckler Report, APIAHF, New York University Center for the Study of Asian American Health, AAPCHO, Temple University Center for Asian Health, and Asian American Research Center on Health sponsored a special issue of the [Journal of Healthcare for the Poor and Underserved: Shining the Light on Asian American, Native Hawaiian, and Pacific Islander Health](#). The special issue

summarizes the history of data equity and spotlights the advances made in health disparity research as a result of the gains made in data equity.

In 2016, APIAHF released [Public-Private Partnerships for Data Equity](#) to highlight recommendations and best practices for building partnerships between community organizations and different levels of government in order to promote data equity. The report includes policy recommendations for forming said partnerships. It also includes a detailed history on advocacy efforts for health data equity for AA and NHPI communities.

In response to the COVID-19 pandemic, Arab Community Center for Economic and Social Services (ACCESS), APIAHF, the National Congress of American Indians (NCAI), the National Urban League, and UnidosUS released [Policy Recommendations: Health Equity Cannot Be Achieved Without Complete and Transparent Data Collection and the Disaggregation of Data](#). This brief provides policy recommendations for improving data collection, reporting, and disaggregation by state health data systems in order to better understand health inequities among populations. It recommends data collection and reporting standards beyond the 1997 OMB standards. Out of this report emerged a guidebook for community leaders and advocates, [Advocating for Data Disaggregation by Race and Ethnicity](#) to help jump start advocacy at the state level for changes to the state health data systems.

## **Education**

Educational data equity has been another area with a lot of activity within the AA and NHPI community. The National Commission on Asian American and Pacific Islander Research in Education (CARE) in partnership with White House Initiative on Asian Americans and Pacific Islanders (WHIAAPI), and support from ETS and Asian Americans/Pacific Islanders in Philanthropy (AAPIP) began iCount, a campaign to disaggregate AA and NHPI student data at the postsecondary level.<sup>22</sup> CARE also collaborated with APIA Scholars to engage in research and produce a series of reports that examine key issues affecting AANHPI student access and success in higher education.<sup>23</sup> The campaign resulted in three reports that use available data sources to highlight educational disparities among different AA and NHPI subgroups and to call for systemic changes at the institutional, state and federal levels in how educational data is collected and reported.

APIA Scholars also worked with institutional researchers in 2019 to examine data equity practices at colleges and universities, specifically from federally designated Asian American and Native American Pacific Islander Serving Institutions (AANAPISIs). This research highlights the use of cross-sectional and longitudinal institutional data in identifying the demographics of students participating in

AANAPISI programs and the impact these programs have on driving AANHPI student success.<sup>24</sup>

The Southeast Asia Resource Action Center (SEARAC) has also been active in the field. In 2013, SEARAC issued a report, [Moving Beyond the “Asian” Checkbox](#) (2013), which examined the comments submitted to the U.S. Department of Education’s Request for Information on data disaggregation to identify opportunities for, challenges to, and existing models around large scale data disaggregation. In 2014 SEARAC led a national campaign, All Students Count, with local and national partners to advocate for government agencies to adopt data disaggregation laws and policies on AA and NHPI students. The effort helped to push Washington state, Minnesota, Rhode Island, and New York to pass data disaggregation laws and resulted in the U.S. Department of Education providing grant funding for states looking to disaggregate data for AA and NHPI students. In 2020, SEARAC issued [Recommendations for Improved Federal Data on Asian Americans and Pacific Islanders \(AAPIL\)](#) that recommended that Congress pass laws regarding disaggregated data collection and a federal student-level data network to reduce analytical burden of postsecondary institutions, that education data standards from postsecondary institutions be revised, and that institutions themselves should be updating their own data processes.

## **Housing**

The premier national coalition of AA and NHPI organizations focused on housing and community development, National CAPACD, has advocated for the Consumer Financial Protection Bureau (CFPB) to include disaggregated AA and NHPI categories in the Home Mortgage Disclosure Act (HMDA) reporting requirements. Starting in 2018, HMDA data now includes detailed disaggregated AA and NHPI data which allows for better tracking of the home mortgage industry and to identify potential predatory or discriminatory practices. National CAPACD, in partnership with the UCLA Asian American Studies Center and UCLA Center for Neighborhood Knowledge, was able to leverage HMDA lending data and the Census Bureau’s American Community Survey (ACS) data for insights into the state of housing for low-income AAPIs since the Great Recession in seven high-cost housing markets and shows the importance of culturally competent housing counseling services for low-income communities of color.<sup>25</sup>

## **Hate Crimes, Discrimination and Criminal Justice**

The major advocacy priorities AA and NHPI communities for improved data collection and disaggregation are around hate crimes and bias incidents, employment discrimination, and incarceration.

Since the backlash on Muslim and South Asian communities post 9-11, organizations such as the Sikh Coalition, Sikh American Legal Defense and Education Fund (SALDEF), South Asian Americans Leading Together (SAALT) and others have pushed the federal government to collect more detailed data on bias incidents and employment discrimination for South Asian, Muslim and Sikh communities. The key point of contention is the lack of disaggregated data on religious discrimination. In the Department of Justice's 2016 report, *Combating Religious Discrimination Today*, roundtable participants from various religious communities recommended the following to improve data on justice issues:

1. More clear communication regarding what constitutes a hate crime and how to report incidents.
2. Improve data collection on religious discrimination in the workplace to address the problems of underreporting.<sup>26</sup>

To address the data gap, community organizations have taken it upon themselves to create databases to track incidents. SAALT released a report in 2001 that documented media reports of bias incidents across the country against South Asian, Muslim and Sikh communities post 9-11.<sup>27</sup> SALDEF in their 2020 National Sikh American Survey asked respondents about feelings of acceptance and safety, bullying, and discrimination.<sup>28</sup> Stop AAPI Hate has collected self-reported data from AA and NHPI community members' experiences with anti-Asian hate incidents.<sup>29</sup>

On the employment discrimination front, the Ascend Foundation has published two reports, one in 2016<sup>30</sup> and one in 2020<sup>31</sup> that examined EEOC data. Their analysis finds that Asian Americans are overrepresented as employees as professionals but underrepresented in executive leadership positions.

Finally, disaggregated data on prison populations is essential to show that Southeast Asian and Pacific Islander communities are disproportionately impacted by mass incarceration and subsequent mass deportation. Advancing Justice-Asian Law Caucus outlined the issue in a blog post in 2016 and continues to work on the intersectional issues of immigrant rights and criminal justice reform.<sup>32</sup> A convening in June of 2015 entitled *AAPIs Behind Bars: Exposing the School to Prison to Deportation Pipeline* issued a report that presented the best available data on AA and NHPIs in prison.<sup>33</sup> Challenges to accurate data on the criminal justice system include race data not being based on self-identification and most prison data categorizes AA or NHPI data in an "Other" category along with American Indians, Alaska Natives, and individuals who were multiracial or some other race. The report used local arrest data to show that Southeast Asian and Pacific Islander youth had extremely high arrest rates.

## **Cross-Sector**

The most influential cross-sector areas of advocacy is around the OMB statistical standards on maintaining, collecting, and presenting federal data on race and ethnicity. The AA and NHPI community is keenly aware of the importance of minimum standards for increasing the availability of detailed data for our communities. During the latest review of the standards initiated in 2016, NCAPA, Advancing Justice-AAJC, APIAHF and SEARAC led a nationwide effort to mobilize AA and NHPI community members to submit over 3,600 public comments advocating for more detailed data collection and reporting.<sup>34</sup>

The National Council of Asian Pacific Americans (NCAPA) has also led cross-sectoral efforts to address data equity for AA and NHPI communities. In 2013, NCAPA released a guide for researchers, titled [Best Practices: Researching Asian Americans, Native Hawaiians and Pacific Islanders](#). The guide covered challenges to AA and NHPI data collection, disaggregation, and community involvement. Aimed primarily at researchers in general, the guide has recommendations that should apply to federal statistical agencies, such as creating inclusive advisory committees, disaggregating data where possible and relevant, and working with AA and NHPI communities to fill data gaps. As part of [NCAPA's 2020 Policy Platform](#), data disaggregation was a cornerstone of addressing AA and NHPI visibility. NCAPA recommended that the OMB Race and Ethnic Standards for Federal Statistics and Administrative Reporting should be updated to include provisions for more detailed race and ethnicity data and to require agencies to justify cases where data does not comply with the minimum standards.

Empowering Pacific Islander Communities' (EPIC) Policy Platform for Native Hawaiians and Pacific Islanders in the United States places data needs at the forefront of their platform. To address the data needs of NHPI communities, the platform recommends targeted special population research, oversampling of NHPI communities in surveys, or pooling of survey data. In addition, EPIC recommends better tracking how many federal research grants end up addressing NHPI issues and how many NHPIs participate in federal programs.<sup>35</sup> To address the challenge of access to data and visibility of NHPI communities, EPIC released a report in 2014 called Native Hawaiian and Pacific Islander Community of Contrasts in partnership with Asian Americans Advancing Justice Los Angeles. The report was created with the intention to serve as an additional tool for the NHPI community and others who seek to better understand and serve this diverse community.<sup>36</sup>

One of the challenges of data collection, analysis, and dissemination for Native Hawaiian and Pacific Islanders population is that for national surveys both population groups are such a small proportion of the total population. So it becomes difficult or costly to produce a statistically valid sample design at the national level

while accommodating the need for statistically stable estimates for NHPI communities. While there are various methodologies that can address the issue, such as oversampling or pooling of data, some NHPI advocacy groups have focused on state and local efforts in geographic regions where NHPI communities make up a large share of the population. For example, Center for Native Hawaiian Advancement (CNHA) and other Native Hawaiian advocacy groups have focused on getting the state and local government in Hawaii to collect and analyze disaggregated data for Pacific Islander groups to help better understand the impact of the COVID-19 pandemic and better tailor services to those populations. The concentration of Pacific Islander populations in certain areas may make it easier to collect sufficient sample sizes at the state or local scale. Guidance from federal statistical agencies on how to collect, analyze and disseminate disaggregated data and funding for local pilot programs may help jumpstart state and local efforts to disaggregate data and also generate lessons that can be applied to the federal level.



# PRIOR INTERAGENCY GOVERNMENT EFFORTS

President Clinton established the first White House Initiative on Asian Americans and Pacific Islanders (WHIAAPI) and President's Advisory Commission on Asian Americans and Pacific Islanders in 1999. An Interagency Working Group (IWG) of 32 federal departments and agencies was created to draft an integrated plan to address the unmet needs of AAs and NHPIs. The Commission released a landmark report in January 2001, *A People Looking Forward: Action for Access and Partnerships in the 21st Century*. The report laid out five cross cutting priorities, one of which was to "Improve Data Collection, Analysis, and Dissemination for Asian Americans and Pacific Islanders," recognizing that data drives implementation of all federal programs. The lack of data often results in the exclusion of AAs and NHPIs from those programs. The Commission report recommended full implementation of the 1997 changes to the OMB data standards, encouraging statistical agencies to go beyond the OMB standards through committing new resources or developing new sampling, analytical or other methods, and building partnerships with community-based partners and experts on AA and NHPI research.<sup>37</sup>

After President Bush shifted the focus of WHIAAPI to business and economic development and moved the initiative to the Department of Commerce,<sup>38</sup> President Obama brought WHIAAPI to the Department of Education and refocused the Initiative on five "cross-cutting priorities: improving data collection, analysis and dissemination of AAPI-specific information; ensuring linguistic and culturally competent access to Federal programs and services; protecting civil rights and equal opportunity; promoting and increasing Federal employment among AAPIs; and increasing outreach and access to Federal grant opportunities and other programs."<sup>39</sup>

WHIAAPI's first report under the Obama Administration was *Winning the Future: A Roadmap for the Asian American and Pacific Islander Community*. The report, released in 2011, outlined the plans for 21 federal agencies to address AA and NHPI community needs in the five priority areas. Ten of the agencies committed to improving data for AA and NHPI communities.<sup>40</sup>

In 2012, OMB released a statistical working paper, *Federal Agency Approaches to Providing Statistical Information on Detailed Asian and Native Hawaiian and Other Pacific Islander Groups*. The paper highlights work by federal agencies such as the Census Bureau, and the Departments of Health and Human Services (HHS), and Labor to expand race and ethnic categories for data collection and to provide more

detailed statistics for AAs and NHPIs and other small groups through increasing sample sizes, oversampling small groups, and pooling data across time.<sup>41</sup>

WHIAAPI and CARE co-hosted two iCount: Equity Through Representation Symposiums in 2013 and 2015. Each two-day symposium highlighted the need for disaggregated data for AA and NHPI students to reveal educational disparities among AA and NHPI subgroups. Breakout sessions sought to generate best practices to implement data disaggregation systematically.

In 2014, *Building the American Mosaic: A Report from the President's Advisory Commission on Asian Americans and Pacific Islanders* highlighted data equity efforts among federal agencies. These included the Department of Labor's analysis of disaggregated data from the Current Population Survey; HHS expanding the race and ethnicity standards for federal health surveys beyond the minimum OMB standards, oversampling of Asian Americans in health surveys, and fielding the first ever Native Hawaiian and Pacific Islander National Health Interview Survey (NHPI NHIS); and the Department of Education's Request for Information (RFI) about best practices in the collection and utilization of disaggregated data on AAPI students.<sup>42</sup>

Under the Trump administration, WHIAAPI was returned to the Department of Commerce to again focus on businesses and economic development. WHIAAPI and the President's Advisory Commission on Asian Americans and Pacific Islanders issued a report in 2020, *Advancing Economic Empowerment for Asian Americans and Pacific Islanders*. The report was released in the context of the growing COVID-19 pandemic and made specific recommendations to expand national surveys to measure the economic and social impact of the pandemic, increase tracking of bias and hate crimes against AAs and NHPIs, and for disaggregating Asian ethnicity and oversampling AAs and NHPIs in surveys.<sup>43</sup>

# CURRENT STATE OF DATA EQUITY AT FEDERAL AGENCIES

This section seeks to set a baseline of the current status of data equity for a set of federal agencies that cover priority issues for the AA and NHPI communities. This snapshot is not exhaustive and is meant to provide AA and NHPI advocates background information to engage with the federal agencies as they build out their data equity initiatives. This report relies on publicly available information, including such sources such as:

- Technical documentation of various surveys outline the type of race and ethnicity data captured and how they are captured.
- Federal register notices for new statistical or data standards as well as call for public comment were also Methods and sources
- The newly issued Data Equity Plans for key agencies as requested by the Equitable Data Working Group
- Reports that specifically address data disaggregation or data equity for AA and NHPI communities by a federal agency

Past administrations focused on data equity and disaggregation on a department or agency level. The current push for data equity is taking a “whole-of-government” approach, looking for opportunities at statistical agencies to go beyond coordinating standards and to begin to look at combining data sets and leveraging underutilized data. Much of the advocacy work has similarly been siloed around issue areas and individual departments and agencies. There needs to be a more coordinated approach to advocating for data equity in this policy environment.

The focus of the Biden administration on a “whole-of-government” approach to data and racial equity presents a unique opportunity to put into place the systemic policy changes and the staff and policy infrastructure for data equity while there is political will to drive the process. Given uncertainties about the priority of future administrations, it is imperative for federal agencies, community and research partners to work collaboratively and create innovative and lasting changes in the data collection, analysis, and dissemination systems at the federal level and to integrate the values and principles of data equity into those operations.

---

## INTERAGENCY EFFORTS

As with prior presidential administrations, the Biden administration has approached data equity through interagency efforts that have variously served to inspire, guide, and coordinate the activities and initiatives of several individual agencies.

### ***Equitable Data Working Group and WHIAANHPI***

Early in President Biden's administration, two executive orders firmly established data equity for AAs and NHPIs as a priority for the administration. The first Executive Order on advancing racial equity and supporting underserved communities, as one of its actions, established the Equitable Data Working Group as part of a "whole of government" approach to advancing racial equity.<sup>44</sup>

The administration also re-established WHIAAPI, renaming the Initiative to the White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders (WHIAANHPI) and returning the Initiative to its first home of HHS. The Executive Order also included the appointment of an AAPI senior liaison within the White House and the re-establishment of the President's Advisory Commission on Asian Americans, Native Hawaiians, and Pacific Islanders.<sup>45</sup>

As data equity has become a top priority for the Biden administration, it has produced a steady stream of reports on data equity including:

1. *Presidential COVID-19 Health Equity Task Force Final Report and Recommendations*: This report includes a "Data, Analytics, and Research" section that recommends standardizing demographic and socioeconomic categories in data, including data disaggregation and collaboration among Federal agencies and stakeholders to collect and disaggregate data on AAs and NHPIs for measuring the socioeconomic and health impacts of the pandemic and behavioral health.<sup>46</sup>
2. *Study to Identify Methods to Assess Equity: Report to the President*: This study from OMB summarizes the frameworks and actions taken by different federal agencies in order to assess equity. It recommends data disaggregation as a critical component of equity assessment, noting that many federal agencies currently lack the expertise to make use of and disaggregate data.<sup>47</sup>
3. *A Vision for Equitable Data - Recommendations from the Equitable Data Working Group*: This report from the Equitable Data Working Group identified key practices for achieving equitable data.<sup>48</sup>

A. *Make disaggregated data the norm while protecting privacy*

Under this recommendation falls the Administration's commitment to revise the standards for maintaining, collecting, and presenting federal data on race and ethnicity taking into account the need for disaggregated data for underserved communities and researchers. OMB is already working on updated guidance to clarify what levels of disaggregated data are already allowable under the current standards. It is vital to encourage federal agencies to go beyond the minimum OMB standards and work with community partners and researchers to identify the AA and NHPI groups that are most in need of disaggregated data. In addition, the Administration will invest in existing surveys to expand sample sizes in order to create disaggregated statistics and also look for alternative ways to create disaggregated estimates, such as multiyear datasets and leveraging administrative data, to create small population estimates in topics of interest, particularly for NHPI communities. All of these methods will increase availability of stable and usable statistics to describe all small populations, especially for the emerging AA and NHPI populations.

B. Catalyze existing federal infrastructure to leverage underused data

The President's FY 2023 budget request is funding the Census Bureau to study the options for linking demographic data that the Census Bureau collects with the administrative data from social safety net and business assistance programs to understand how to improve equity impact for those programs. Administrative data has some potential benefits from survey data for AA and NHPI populations. For example, many Asian immigrants have a difficult time navigating the public benefit system and rely on community-based organizations to help them. So for survey questions, they may not be providing the most accurate information on which program they receive benefits from. The administrative data for the social benefit agencies, if it can be tied to demographic data from the Census Bureau, provides potentially more accurate information on program participation and also may reduce report burden on individuals.

C. Build capacity for robust equity assessments for policy making and program implementation

The FY2023 budget request will build staff capacity for data equity work to support the evidence-based policies consistent with the Evidence

Act. The Administration will also leverage American Rescue Plan (ARP) funds to support state, local, territorial, and Tribal data infrastructure to allow for more disaggregated data collection. The potential for the Administration to fund pilot projects will provide opportunities to demonstrate best practices for implementing data disaggregation. In partnership with community partners and researchers, the projects could also be designed to address major priorities in AA and NHPI communities.

- D. Galvanize diverse partnerships across levels of government and the research community

The Administration will prioritize building collaborations among federal, state, local, territorial and Tribal governments to share data to better evaluate social safety net programs. Best practices on how to protect the data and how to ensure that the collection of the data does not discourage program participation. The Administration will also seek to create grants to support research by historically underrepresented scholars to help build research capacity to address data equity, including those at Historically Black Colleges and Universities and other Minority-Serving Institutions.

- E. Be accountable to the American public

The Administration has committed to increased transparency and accountability on the progress to data equity. This will take the form of community engagement, reports and studies to measure progress toward initiative goals, and building data tools (such as dashboards, query systems, and data visualizations) that are user-friendly, easy to understand, and accessible and meaningful to communities. The recommendations include funding for the Census Bureau to create and host data equity tools in partnership with other agencies and stakeholders.

## **Office of Management and Budget**

The most recent review of the 1997 Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity occurred in September 2016 when the OMB published a Federal Register notice asking for comments in four areas:

1. Whether race and ethnicity data should be collected in a separate question format or a combined question format;
2. The creation of a Middle Eastern and North African race category;

3. Clarifying the minimum reporting categories; and
4. Changing the terminology used for race and ethnicity categories to reflect the growing and changing diversity of our country.<sup>49</sup>

Many of these recommendations were based on extensive research and community outreach by the U.S. Census Bureau and other federal agencies under the Obama administration to greater accuracy and usefulness in the collection of race and ethnicity data.

An interim report from the Federal Interagency Working Groups for Research on Race and Ethnicity was issued in April 2017, along with a request for comments.<sup>50</sup> However, the Trump administration took no further action on the topic via OMB and, consequently, the 2020 Census did not incorporate any of the recommended changes. The Biden Administration has announced plans to revisit the OMB standards, and this move is supported by a coalition of dozens of community organizations and civil rights coalitions who signed and submitted a joint letter to OMB in March 2022, urging the agency to “to take swift action to revive the revision of the federal data standards” in order to “enhance the quality of data used by scores of decision-makers in the public and private sector.”<sup>51</sup>

---

## CENSUS BUREAU

As the largest federal statistical agency, the Census Bureau is a key innovator in the methods of collecting race and ethnic questions and is the gold standard on collecting and producing data for AA and NHPI communities. Because the decennial census underlies all federal surveys particularly in weighting of survey data, the Census Bureau’s question design for race and ethnicity are often adopted by other agencies for their own surveys.

The Census Bureau has also recognized the importance of engaging communities and other stakeholders in the entire data production process. For example, in both the 2010 and 2020 Censuses, the Census Bureau created a vast network of partners to encourage the public to participate in the Census, including partnerships with community-based organizations, local businesses and associations, and other groups who had a stake in obtaining an accurate count.<sup>52</sup> After the completion of the 2020 Census, several community organizations, researchers, and private foundations advocated for the preservation and continuation of these tribal, state, regional, and local partnerships, and to make the community partnership programs evergreen rather than be subject to a period of boom-and-bust cycles coinciding with each decennial census.

In its May 2021 meeting, the Census National Advisory Committee passed a recommendation to create such an evergreen community partnership specialist program, in line with advocacy efforts by entities such as Census Counts, the Census Funders Initiative, and Census Legacies. In October 2021, the Census Bureau accepted the recommendation,<sup>53</sup> and has since created the Office of Strategic Alliances to help maintain and build community and stakeholder partnerships on an evergreen basis.<sup>54</sup>

## ***Design and Development***

The Census Bureau has done extensive research and testing of various formats for questions on race and ethnicity. These included testing of alternative question formats during the 2010 Census and the 2015 National Content Test. These tests looked at the impact on response rates and consistency of answers for combined versus separate questions on race and ethnicity, the inclusion of a separate Middle Eastern or North African category, and different instruction wording or question terminology. The research informed the OMB's Federal Register Notice in 2016 calling for comments on the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. While ultimately the federal government did not move forward in adopting new standards for race and ethnicity data, the Census Bureau did make modifications to their 2020 Census race and ethnic questions while still conforming to the 1997 OMB standards.

The U.S. Census Bureau's scientific advisory committee advises the Bureau on demographic, economic, and statistical research design and implementation as well as other technical and operational matters.<sup>55</sup> Similarly, the Census Bureau's national advisory committee advises on matters pertaining to historically undercounted populations, including communities of color, immigrant communities, and those experiencing language and other barriers. Both advisory committees provide opportunities for external stakeholders and experts to weigh in on changes to data collection on race and ethnicity.<sup>56</sup> Public comments are accepted during these advisory committee meetings and are treated as part of the public record.

The Census Bureau has embarked on a transformation and modernization process that seeks to incorporate new methods and sources of data to improve data quality, and to use an equity lens to incorporate alternative perspectives and diverse voices. The Census Bureau intends to address racial equity by improving the quality and utility of the data it produces; increase engagement with stakeholder, especially for underserved communities; and build a culture of documentation and evaluation to learn and share best practices internally and with the wider statistical community.<sup>57</sup>



## ***Compilation, Processing, and Analysis***

Also for the 2020 Census, the Census Bureau expanded coding of race and ethnicity variables to include categories that reflect changing demographics and immigration patterns of the country and allowing for capturing up to 200 characters in the 2020 Census (up from 30 characters in the 2010 Census) for all race and ethnic write-in responses and increased the number of categories coded for each write-in area from 2 codes to 6 codes. The code lists used to process the 2020 Census data, and future Census Bureau surveys, were developed based on the results from testing as well as stakeholder engagement. Through this process, the Census Bureau expanded the number of unique codes for detailed Asian groups from 32 unique codes in 2010 to 63 unique codes in 2020. Some of those new codes include Central Asians (individuals who identify as Afghan, Kazakh, Kyrgyz, Tajik, Turkmen, and Uzbek). For the 2010 Census, there was no explicit code for Central Asians, while Afghans were classified as White. For Native Hawaiian and Pacific Islanders, the Census Bureau increased the number of unique codes from 29 in the 2010 Census to 51 unique codes in the 2020 Census. For both censuses there were 3 unique codes for Native Hawaiians (Native Hawaiian, Hawaiian, and Part Hawaiian).

An area the Census Bureau needs to improve their engagement with stakeholders is in regards to communicating about the new privacy methodology they have implemented for the 2020 Census data products. The data user community has major concerns about the impact of differential privacy on the accuracy and timeliness of the 2020 Census data products, particularly for detailed race and ethnic origin data. The Census Bureau National Advisory Committee issued a series of recommendations to improve the Census Bureau's messaging around differential privacy. The recommendations primarily center around making sure that communications to the general public on differential privacy be accessible and understandable and that the impacts of differential privacy on the accuracy and usability of the 2020 Census data be clearly stated.<sup>58</sup>

## ***Dissemination and engagement***

Data access and dissemination remain an area for improvement for the Census Bureau. While data is readily available, the means of access have substantial barriers of entry for non-expert users. The Census Bureau does have staff dedicated to providing both in-person and virtual training to use the various platforms for data dissemination that the Bureau has created.<sup>59</sup> The Census Bureau has also undertaken pilot projects to create more integrated and user-friendly data dissemination tools. For example the Census Bureau has created My Community Explorer using ArcGIS Online. The tool pulls from a broad range of social, economic, race, ethnicity, business, and community resiliency data to provide a one-stop tool to examine statistics for any county in the country. The new initiatives to improve data

access emphasize place and neighborhood, which tend to work for communities of color that are highly concentrated or segregated by geography. For AA and NHPI communities, which tend to be more dispersed, the Census Bureau also needs to prioritize data tools at higher levels of geography, including at the national and state level. The community-friendly tools that aggregate data across different tables and sources of information will need to be disaggregated by race and ethnicity in order to be meaningful and useful for AA and NHPI communities.<sup>60</sup>

The Census Bureau has increased investment in community partnership programs for each decennial census, having seen the value in these partnerships to increase participation in the census in communities at risk for undercounts. In previous censuses, the Bureau would let these partnerships go into hibernation. Realizing that having to rebuild these partnership programs from scratch every decade was inefficient, the Census Bureau has decided to invest in maintaining the community relationships from the 2020 Census outreach effort by establishing an Office of Strategic Alliances. The Office has set the following goals for itself:

- Engage with external entities to help promote education and respondent participation in the decennial census, economic census, census of governments, and other demographic and economic surveys.
- Engage with internal stakeholders who manage relationships with the Census Bureau's partners, external stakeholders, and customers to leverage those relationships to meet the objectives of the strategic plan and the needs of program areas.
- Engage with external entities to leverage knowledge and data assets in the modernization of Census Bureau data products, collection, acquisition, and dissemination.
- Engage with external entities to seek feedback on their data needs and identify data gaps to solve challenges related to their businesses, organizations, or communities.

The Census Bureau also engages data users through the State Data Center network that engages with state and local government data users and the Census Information Center (CIC) network that aims to promote the use of Census Bureau data products and services among underserved communities, such as communities of color, rural communities, senior citizens, and children. There are currently 10 Asian American-serving CICs and one Native Hawaiian-serving CIC. The CICs provide vital feedback on Census data products and tools and provide examples of how Census Bureau data is used to help the communities they serve. The CICs also promote data accessibility and training to their communities.<sup>61</sup>

---

## HEALTH AND HUMAN SERVICES

Health disparities and access to disaggregated health data have been two primary drivers in the push for data equity for AA and NHPI communities. Through persistent advocacy efforts, both the National Health Interview Survey (NHIS) and the National Health and Nutrition Examination Survey (NHANES) now oversample Asians, the NHIS since 2006 and the NHANES since 2011.<sup>62</sup> For Native Hawaiians and Pacific Islanders, the National Center for Health Statistics (NCHS) conducted the first ever Native Hawaiian and Pacific Islander National Health Interview Survey (NHPI NHIS), a survey of 3,000 NHPI households using the 2014 NHIS survey instrument. Public use data from this survey was released in March 2017.<sup>63</sup>

For the NHIS, public data only reports Asian American estimates, while estimates for AA and NHPI subgroups and Native Hawaiian and Pacific Islander in aggregate were only available in the restricted use files due to confidentiality concerns. No NHPI subgroup data is collected in NHIS. For NHANES, only Asian subgroup data is collected, not Native Hawaiian and Pacific Islander subgroup data. For public data products, only Asian aggregated data is reported. Native Hawaiian and Pacific Islander data is not available separately in NHANES data releases.

The Office of Minority Health at HHS compiled and periodically updates a [Compendium of Federal Datasets Addressing Health Disparities](#). The compendium sets out to “provide a one-stop shop for understanding the landscape of federal datasets related to health equity, and ultimately, can help to shape and inform the development of effective programs, policies, and practices.”<sup>64</sup>

---

## BUREAU OF LABOR STATISTICS

The Bureau of Labor Statistics (BLS) is charged with producing the data the government needs to monitor labor markets, price changes, working conditions, and labor force productivity in the U.S. The BLS's primary data source is the Current Population Survey (CPS), which is administered by the Census Bureau. In the past, the Department of Labor has leveraged the CPS to highlight challenges faced by Asian American labor force during and after the Great Recession of 2008. A series of reports in 2011, 2014, and 2016 showed an evolution in analysis from only focusing on Asian Americans in aggregate in the 2011 report, to expanding the analysis to detailed Asian ethnic groups and including analysis of the impact of the Great Recession on Native Hawaiians and Pacific Islanders in the 2014 and 2016 reports. Both the 2014 and 2016 reports show the importance of access by researchers to microdata. Regression analysis of CPS microdata was able to show that AA and NHPI workers who had similar characteristics, such as age, gender, marital status,

education, and citizenship, and similar jobs earned less than non-Hispanic White workers. AA and NHPI workers also had higher unemployment rates than non-Hispanic workers with similar characteristics.

The Department of Labor’s Equity Action Plan outlines a number of data equity-related priorities.<sup>65</sup>

- “Understanding—and improving—the equity data we collect: Advancing equity requires data in order to assess the needs of underserved populations, the scope of existing programs, and the impacts of potential interventions. Last year, DOL conducted an inventory of the equity-oriented data collected by agencies to better understand where there are gaps in necessary data and opportunities for addressing those gaps. One issue identified by this inventory involves missing demographic data for program participants, including employment and training programs, which makes it more difficult to assess whether those programs are reaching our nation's workers. ETA thus launched an analysis to better understand the extent of missing demographic data, its impact on interpreting program data, and options for improving data quality. Lessons from this project are being applied to other programs (including new grant initiatives, within the bounds of federal nondiscrimination law), to expand the collection of demographic data and improve its quality, and to strengthen analyses of equitable access to programs and services.”
- “Lack of disaggregated data on program access by demographic characteristics prevents regular equity tracking that could promote accountability and inform changes to program laws and administration”
- “Create new indicators of program access and barriers to identify equity gaps using UI program data, including key measures like application, reciprocity, denial, and timeliness rates broken out by demographic groups (especially race, ethnicity, education, age, gender, disability status, geographic area, and language proficiency)”

---

## DEPARTMENT OF JUSTICE

With an increase in incidents and coverage of anti-Asian bias incidents and hate crimes since 2020, issues related to reporting, categorizing, and sharing of anti-Asian hate crime statistics have come to the fore. The Department of Justice (DOJ) has directed the Federal Bureau of Investigation to update their Crime Data Explorer web tool to spotlight anti-Asian hate crimes and provide scenario-based training in

their data collection training manual for state and local partners to improve the collection of anti-Asian hate crimes data.<sup>66</sup>

On May 20, 2022, the Department of Justice released a special report, *Raising Awareness of Hate Crimes and Hate Incidents During the COVID-19 Pandemic*.<sup>67</sup> The report cited FBI Hate Crimes Statistics showing an increase in reported hate crimes against Asians/Asian Americans, Native Hawaiians, Pacific Islanders, and Black communities. The report also cited Stop AAPI Hate's efforts to document hate crimes and incidents. The report also found serious underreporting and nonreporting of hate crimes by local law enforcement agencies to the FBI's Uniform Crime Reporting (UCR) program. DOJ's National Crime Victims Survey also shows that about 42 percent of violent hate crimes were not reported to law enforcement. The report makes a series of recommendations aimed at building awareness about hate crimes, working with communities to address hate crimes issues, and creating opportunities to build alliances and understanding across all communities.

To address these issues around underreporting and , the DOJ FY 2023 Budget asks include investments in the volume, quality, and analysis of data collected by the National Incident-Based Reporting System, the successor system to the previous Summary Reporting System used by the UCR program, and improving the National Crime Victimization Survey to improve coverage of historically underserved communities.

Anti-Asian hate crimes are not the only criminal justice data set for which data disaggregation helps to provide higher quality information about community experiences. Surveys conducted by the Bureau of Justice Statistics include questions on race and ethnicity detailing statistics related to crime and prisoner populations, with separate categories for Asian and Native Hawaiian and Pacific Islander. Most statistical reports from the Bureau, however, continue to combine AAs and NHPIs into one reporting category rather than the two separate categories of Asian only and Native Hawaiian and Pacific Islander only. Lack of data on AAs and NHPIs in criminal justice statistics is one of the reasons why these communities have been left out of the criminal justice debate, despite indications that incarceration rates are increasing for AAs and NHPIs, particularly for Southeast Asians and Pacific Islanders.<sup>68</sup>

DOJ will also seek to develop findings and recommendations for improved data collection and equity performance metrics and reporting by grant recipients, including establishing criteria by which the Department and its grant-making offices can hold themselves accountable and measure success for improving equity through DOJ programs. This will include, but is not limited to, improved Title VI and Safe Streets Act data collection.<sup>69</sup>

---

## DEPARTMENT OF EDUCATION

In May of 2012, the Department of Education issued a Request for Information (RFI) on data disaggregation for AA and NHPI students and use cases for planning and programming.<sup>70</sup> This RFI was aimed at collecting best practices and policies for state and local education agencies, schools, and higher education to overcome challenges in collecting and disseminating AA and NHPI subgroup data. The RFI was not aimed at changing Federal educational data reporting requirements.

Separate statistical standards for the National Center for Education Statistics (NCES) were also revised in 2012. These standards are designed to guide the NCES staff and contractors in the design and implementation of data collection, analysis and dissemination activities. These standards adhere to the 1997 OMB standards with Asians in a separate category from Native Hawaiians and Pacific Islanders, but, where sample size makes it possible, allow for the collection of additional AA and NHPI subgroup data.

National Forum on Education Statistics issues a *Forum Guide to Collecting and Using Disaggregated Data on Racial/Ethnic Subgroups* to inform state and local policymakers about what data disaggregation is, how it benefits schools to collect and analyze this data, and best practices to implement when adopting data disaggregation to existing data collection processes.<sup>71</sup>

The Department of Education regularly conducts the Civil Rights Data Collection (CRDC). The CRDC collects data on student enrollment and educational programs and services by race and ethnicity, sex, limited English proficiency, and disability. The CRDC only began to collect Asian student data separately from Native Hawaiian and Pacific Islander students in the 2011-12 school year, and detailed AA and NHPI categories are yet to be collected. The data is used by the Department of Education Office for Civil Rights to enforce the civil rights laws and by other education policymakers and researchers.<sup>72</sup>

The 2022 Agency Equity Plan has outlined a plan to build an Equity Dashboard populated with metrics recommended by the National Academies of Sciences report, *Monitoring Educational Equity*.<sup>73</sup>

---

## HOUSING AND URBAN DEVELOPMENT (HUD)

HUD's Equity Action Plan focuses on bringing an equity lens to procurement, fair housing and civil rights resources, homeownership, and homelessness. Data plays a critical role in tracking and evaluating the implementation of the Equity Action Plan, but no specific data equity issues for AA and NHPI were identified in the plan.

To comply with a 2009 Congressional mandate to assess Native American housing needs, HUD undertook a study of the housing needs of Native Hawaiians living in Hawaii. The report found a significant need for affordable housing and less crowded housing by Native Hawaiians, especially by those on the waitlist for homestead leases on Hawaiian homelands.<sup>74</sup>

One area of innovation that HUD researchers are contributing is merging two different datasets to create more detailed characteristic data. The CoC Analysis Tool: Race and Ethnicity combines ACS characteristics data with Point-In-Time Count data to help identify possible racial disparities in homelessness in Continuums of Care areas. Unfortunately the tool is not yet able to provide detailed AA and NHPI group estimates.<sup>75</sup> HUD also put out a guide titled COVID-19 Homeless System Response: Data & Equity: Using the Data You Have to help service providers leverage data to identify disparities and achieve more equitable outcomes.<sup>76</sup>

---

## CONSUMER FINANCIAL PROTECTION BUREAU

The Consumer Financial Protection Bureau (CFPB)'s collection of Home Mortgage Disclosure Act (HMDA) data may also serve as an excellent model for federal agencies in implementing disaggregated data practices. HMDA data have included detailed race and ethnicity categories starting with the 2018 data.

HMDA data in 2018 began allowing for the collection of applicant and co-applicant information for detailed Asian, Native Hawaiian and Pacific Islander groups. Up to five race categories and five Hispanic/Latino categories could be collected for the applicant and the co-applicant. Write-in options for both race and Hispanic categories were available. However, the option of self-reporting race at an aggregated level is also possible. Observed data collection either by visual observation or surname identification, were also allowed in cases where the applicants did not self-identify. CFPB's own analysis of the HMDA data showed a wide variation among Asian and NHPI subgroups in terms of credit scores, incomes, combined-loan-to-value ratios and debt-to-income ratios, making it clear that aggregated data hides existing disparate outcomes in housing markets for AA and NHPI communities.

---

## SOCIAL SECURITY ADMINISTRATION

The collection of race and ethnicity data from Social Security applications has always been voluntary because the data was not essential to the administration of the program. However, changes over the years reduced the utility of the race and

ethnicity data collected through Social Security applications. In 1980, the SS-5 application forms began to indicate that race and ethnicity responses were voluntary. In 1986, the Tax Reform Act of 1986 required taxpayers claiming children as dependents to obtain a Social Security number (SSN) for each child aged 5 or older. Currently, nearly all applications are collected electronically either at birth or upon entry into the United States. For both application methods, race or ethnicity is not collected by SSA, due to the information not being essential to the administration of the program and restrictions on data sharing. Instead, the SSA researchers rely on using SSN as a record link to connect administrative and survey data to obtain race and ethnicity data for program evaluation. SSA works primarily with the Current Population Survey, the American Community Survey, the Survey of Income and Program Participation and the University of Michigan's Health and Retirement Study.<sup>77</sup>

Challenges remain with the analysis and dissemination of data on AAs and NHPIs from the SSA. A quick overview of the SSA's Research, Statistics & Policy Analysis web site shows many instances where tables with published data on race and ethnicity do not include data on AAs and NHPIs or the data is aggregated together, contrary to the 1997 OMB standards. With the rapid growth in Asian American seniors, it is essential that disaggregated data be collected and reported. The growth in the Asian American senior population will further overwhelm any Native Hawaiian and Pacific Islander data if aggregated data continues. In addition, disaggregated data will help refine any analyses due to the different immigrant waves and socioeconomic experiences among Asian American communities.

---

## **EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

The Equal Employment Opportunity Commission (EEOC) collects workforce data from employers. Reporting by employers include separate categories for "Asian" and "Native Hawaiian or Other Pacific Islander" in compliance with the OMB statistical standard. In addition, the EEOC also expanded the number of AA and NHPI national origin groups collected in their charge data to 12 categories: Cambodian, Chinese, Filipino, Hmong, Indian, Japanese, Korean, Laotian, Pakistani, Thai, Taiwanese, and Vietnamese.

The EEOC provides key data to the public on employment statistics, complaints of employment discrimination, and enforcement, including charge data collected from people alleging they have been discriminated against by a private, state, or local employer.



EEO-1 Data is most easily accessed from the EEOC Explore Tool and the EEO-1 Public Use File.<sup>78</sup> The tool is relatively new and only has data from Fiscal Year 2014 – 2018. The EEOC is working to add more data to the website.

Federal sector data are most easily found in the federal sector annual reports. The reports, especially the workforce tables, provide disaggregated data about Asians and Native Hawaiians/Pacific Islanders.<sup>79</sup>

Public access to charge data is less straightforward. The EEOC itself has published disaggregated charge data of AA and NHPI in two recent data highlights: [The Continuing Impact of Pay Discrimination in the United States](#)<sup>80</sup> and [Sexual Harassment in Our Nation's Workplaces](#).<sup>81</sup>

While not statistical data, the EEOC also periodically publishes selected cases lists including one on Asians and Pacific Islanders and another for the Muslim, Sikh, Arab, Middle Eastern and South Asian Communities.<sup>82</sup>

# RECOMMENDATIONS AND NEXT STEPS

Asian American, Native Hawaiian, and Pacific Islander (AA and NHPI) communities have long relied on timely and accurate data and research to ensure that public and private programs are adequately addressing community needs. The Biden administration has shown a strong commitment to advancing racial equity through improved research and data collections across federal agencies, and this has included the establishment of the Equitable Data Working Group as part of a “whole of government” approach to advancing racial equity.

In April 2022, the Equitable Data Working Group released a report with its initial set of findings and recommendations for action, which we have summarized earlier in this report. Many of these recommendations are in line with AAPI Data’s framework to achieve large-scale impact called DNA: Data, Narrative, Action.<sup>83</sup> As the Equitable Data Working Group report notes, improvements in data standards are necessary to achieve data equity, but are not sufficient to do so by themselves. Actions are needed, including increased investments in innovative methods to collect and analyze data pertaining to smaller populations who have been historically underserved, increased support for scholars who study marginalized populations, and improvements in the ways that data are shared back with communities.

When it comes to building better data dashboards, queries, and visualizations, we see a lot of room for improvement for federal agencies. For example, the April 2022 report of the Equitable Data Working Group points to the U.S. Census Bureau’s Community Resilience Estimates for Equity as “an easily understood metric for how vulnerable every neighborhood in the United States is to the impacts of disasters, including COVID-19.”<sup>84</sup> Our review and assessment of the [linked data tool](#), however, indicates that most community members as well as policy makers and other decision makers would find the volume of data provided to be non intuitive, complicated, and confusing.

We recommend that federal agencies could learn from best practices in data accessibility from private-sector organizations, many of whom have produced user-friendly, interactive data dashboards on topics such as the New York Times dashboard on [COVID-19 case rates](#) and the AARP’s [Livability Index](#) that enables comparisons across geographic areas and “deeper dives” into particular indicators. Creating a pipeline of data reporting and visualization talent could help federal agencies build the kind of innovative capacity they need in order to make data more accessible and useful.

Finally, several tools such as Community Resilience Estimates for Equity provide place-based measures of community vulnerability that summarize across racial and ethnic groups in a particular geographic area rather than providing race-specific measures of vulnerability for communities in that area. While this kind of race-specific measure of vulnerability may not be possible for small geographic areas due to sample size and data privacy concerns, federal agencies should implement data tools that can be disaggregated by race and ethnicity at levels of geography with sufficiently large populations, including at the level of metropolitan area, state, and nation.

In addition to actions, which can take the forms of improvements in government policies, practices, and investments by government agencies and programs, it is also vital for federal government agencies to consider the role of community narrative in shaping federal data equity strategies and priorities. By building stronger relationships with community organizations and recognizing their subject matter expertise through oral histories and lived experiences, federal agencies can help ensure that their data and research are seen as meaningful and legitimate among a range of stakeholders, including historically marginalized populations. Some aspects of narrative can be subsumed under the rubric of data, with smaller-scale qualitative data collections that can be used as exploratory or explanatory research in conjunction with larger-scale data collections. More expansively, however, narratives can be critical in shaping the ways that data collections are designed and understood, and the ways that data products are marketed, made accessible, and rendered meaningful to historically marginalized communities.

Additional recommendations on advancing data equity come from the September 2021 NCAPA coalition letter that was developed in partnership with community-engaged researchers. These include:

1. Creating additional case studies and pilot research and implementation programs by the Equitable Data Working Group that are specific to AA and NHPI communities and that can offer insights that can inform the work of various federal agencies;<sup>85</sup>
2. Updating the federal minimum standard for data collection across all relevant agencies that expands upon the categories used in the 2020 Census and American Community Survey, so as to include smaller Asian American, Native Hawaiian, and Pacific Islander populations;
3. Creating pilot program(s) or incentivize agencies to expand their current data collection categories for AA and NHPIs beyond the newly created federal minimum standard;

4. Ensuring adequate discretionary funding to all federal agencies to meet new data equity standards and requirements;
5. Committing the Domestic Policy Council to submit an annual public report regarding federal agencies' data practices and progress federal agencies are making towards the disaggregation of AA and NHPI data into recommended expanded categories;
6. Ensuring the inclusion of community and scientific expert voices, in all stages of federal statistical data collection, including its design and development, collection, compilation, processing, analysis, dissemination, and preservation; and
7. Creating and supporting a scientific advisory committee and a community advisory committee on data equity, similar to the structure adopted by the U.S. Census Bureau, with significant representation by Asian Americans, Native Hawaiians, and Pacific Islanders.

To these recommendations, we add two more that have emerged from community concerns about delays associated with the release of detailed origin data from the 2020 Census:<sup>86</sup>

8. Prioritizing timeliness between completion of data collection and reporting data back to community members; and
9. After the dissemination and outreach phase associated with data products, engaging with community members and researchers on evaluation and changes to data criteria and data systems.

For over two decades, the top priority of AA and NHPI communities with respect to data equity has been on data disaggregation, meaning the production of detailed origin/ethnicity data. Moving forward, it is clear that our communities' agenda with respect to data equity can be characterized as "disaggregation plus," meaning that improved federal standards for data collection remain a high priority, but the focus has expanded to include other important factors such as timeliness, accessibility, human-centered design, community inclusion, and federal agency recognition of subject matter and population expertise among community organizations and researchers alike.

# TERMINOLOGY AND GLOSSARY

Research pertaining to federal agencies, data collections, racial equity, and communities of color often involves the use of specialized terms and acronyms. In some instances, there are also multiple and alternative terms that are used to describe racial and detailed origin populations as well as concepts, measures, and indicators related to various outcomes and processes. Below, we provide a description of terms used frequently in this report.

---

## FEDERAL AGENCIES

**OSTP** - Office of Science and Technology Policy, part of the Executive Office of the President, advises the President “on the scientific, engineering, and technological aspects of the economy, national security, homeland security, health, foreign relations, and the environment.” (Source: Office of Science and Technology Policy (White House) <https://www.whitehouse.gov/ostp/>)

**OMB** - Office of Management and Budget, part of the Executive Office of the President, is responsible for developing the federal budget, managing work across federal agencies, and coordinating and reviewing all significant federal regulations. (Source: Office of Management and Budget (White House) <https://www.whitehouse.gov/omb/>)

---

## COMMUNITY ORGANIZATIONS

**NCAPA** - The National Council of Asian Pacific Americans

**APIAHF** - Asian and Pacific Islander American Health Forum

**CNHA** - Council for Native Hawaiian Advancement

**EPIC** - Empowering Pacific Islander Communities

**National CAPACD** - National Coalition for Asian Pacific American Community Development

**SAALT** - South Asian Americans Leading Together

**SALDEF** - Sikh American Legal Defense and Education Fund

**SEARAC** - Southeast Asia Resource Action Center

---

## RACE AND ETHNICITY CATEGORIES<sup>87</sup>

**American Indian or Alaska Native** – A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.

**Asian** – A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

**Black or African American** – A person having origins in any of the Black racial groups of Africa.

**Hispanic or Latino** – A person of Cuban, Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race.

**Native Hawaiian or Other Pacific Islander** – A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**White** – A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

**Asian American** - Term used by community organizations, researchers, journalists, and public agencies to refer to residents of the United States who self-identify as Asian with respect to race or as one of the detailed Asian racial categories. Asian American should not be hyphenated.

**Native Hawaiian or Pacific Islander or NHPI** - Alternative term for the racial category of Native Hawaiian or Other Pacific Islander as currently maintained by the 1997 OMB standards.

**AA and NHPI** - Acronym that recognizes the fact that Asian American and NHPI are separate racial categories per the 1997 OMB standards.

**AAPI** - Asian American and Pacific Islander. Term has less common usage today, given that it does not explicitly mention Native Hawaiian as part of the NHPI racial category.

**API** - Asian Pacific Islander. Term in infrequent use today, given that Asian American is the preferred term to refer to residents of the United States who self-identify as Asian or as one of the detailed Asian racial categories.

**APA** - Asian Pacific American. Legacy term that is used by several organizations founded prior to the 1997 OMB standards on race and ethnicity.

**APIA** - Asian and Pacific Islander American. Legacy term that is used by several organizations founded prior to the 1997 OMB standards on race and ethnicity

# ENDNOTES

---

- <sup>1</sup> Neil G. Ruiz, “Key Facts about the U.S. H-1B Visa Program,” *Pew Research Center* (blog), April 27, 2017, <https://www.pewresearch.org/fact-tank/2017/04/27/key-facts-about-the-u-s-h-1b-visa-program/>
- <sup>2</sup> We are grateful to Empowering Pacific Islander Communities (EPIC) for their thorough explanation of the web of relationships involving the United States and Pacific Islander communities <https://www.empoweredpi.org/our-community>
- <sup>3</sup> The White House. “The Release of the Equitable Data Working Group Report,” April 22, 2022. <https://www.whitehouse.gov/ostp/news-updates/2022/04/22/the-release-of-the-equitable-data-working-group-report/>.
- <sup>4</sup> Equitable Data Working Group (White House). 2022. *A Vision for Equitable Data Recommendations from the Equitable Data Working Group*, p. 3.
- <sup>5</sup> See Margo J. Anderson, *The American Census: A Social History* (New Haven: Yale University Press, 1988), and C. Matthew Snipp, “Racial Measurement in the American Census: Past Practices and Implications for the Future,” *Annual Review of Sociology* 29, no. 1 (August 1, 2003): 563–88, <https://doi.org/10.1146/annurev.soc.29.010202.100006>
- <sup>6</sup> Correspondence between National Council of Asian Pacific Americans and Domestic Policy Council (White House), September 9, 2021.
- <sup>7</sup> For more details on the work of the Office of Management and Budget, visit the agency’s website: <https://www.whitehouse.gov/omb/>
- <sup>8</sup> U.S. Census Bureau. (2022). Measuring Race and Ethnicity Across the Decades: 1790-2010. Retrieved from [https://www.census.gov/data-tools/demo/race/MREAD\\_1790\\_2010.html](https://www.census.gov/data-tools/demo/race/MREAD_1790_2010.html)
- <sup>9</sup> Standards for the Classification of Federal Data on Race and Ethnicity. 60 Fed. Reg. 44674 (Aug. 28, 1995). <https://www.federalregister.gov/d/95-20787>
- <sup>10</sup> Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. 62 Fed. Reg. 58782 (Oct. 30, 1997). <https://www.federalregister.gov/d/97-28653>
- <sup>11</sup> Report of the Secretary’s Task Force on Black & Minority Health. (1985). U.S. Dept. of Health and Human Services. <https://collections.nlm.nih.gov/catalog/nlm:nlmuid-8602912-mvset>
- <sup>12</sup> Wallman, K.K., Evinger, S., & Schechter, S. (2000). Measuring our nation's diversity: developing a common language for data on race/ethnicity. *American journal of public health*, 90(11), 1704–1708. <https://doi.org/10.2105/ajph.90.11.1704>
- <sup>13</sup> King, R.C. (2000). Racialization, Recognition, and Rights: Lumping and Splitting Multiracial Asian Americans in the 2000 Census. *Journal of Asian American Studies* 3(2), 191-217. <https://doi:10.1353/jaas.2000.0017>
- <sup>14</sup> King, R.C. (2000). Racialization, Recognition, and Rights: Lumping and Splitting Multiracial Asian Americans in the 2000 Census. *Journal of Asian American Studies* 3(2), 191-217. <https://doi:10.1353/jaas.2000.0017>

- <sup>15</sup> Hirschman, D. Alba, R., & Farley, R. (2000). The Meaning and Measurement of Race in the U.S. Census: Glimpses into the Future. *Demography*, 37(3), 381-393. <https://www.jstor.org/stable/2648049>
- <sup>16</sup> Snipp, C. (2003). Racial Measurement in the American Census: Past Practices and Implications for the Future. *Annu. Rev. Sociol.*, 29:563-88 <https://doi:10.1146/annurev.soc.29.010202.100006>
- <sup>17</sup> U.S. Census Bureau. (2022). National Advisory Committee (NAC). Retrieved from <https://www.census.gov/about/cac/nac.html>
- <sup>18</sup> U.S. Census Bureau. Procedural History of the 1980 Census. Retrieved from [https://www2.census.gov/prod2/decennial/documents/1980/proceduralHistory/Chapter\\_02.pdf](https://www2.census.gov/prod2/decennial/documents/1980/proceduralHistory/Chapter_02.pdf)
- <sup>19</sup> Asian Americans Advancing Justice | AAJC. (2021). "Preliminary Report: Impact of Differential Privacy & the 2020 Census on Latinos, Asian Americans and Redistricting," April 5, 2021, Retrieved from <https://www.advancingjustice-aaajc.org/report/preliminary-report-impact-differential-privacy-2020-census-latinos-asian-americans>
- <sup>20</sup> AAPI Data. (2021). Call to Action: 2020 Census and Data Equity for AAPIs. December 15. Retrieved from <https://aapidata.com/blog/data-equity-2020census/>
- <sup>21</sup> Rachel Marks (2022). "Plans for Producing Detailed Racial, Ethnic and Tribal Data from the 2020 Census." April 27. Retrieved from <https://www.census.gov/newsroom/blogs/random-samplings/2022/04/2020-census-detailed-race-ethnic-tribal-data.html>
- <sup>22</sup> National Commission on Asian American and Pacific Islander Research in Education (CARE). (2022). iCount Project. Retrieved from <http://care.gseis.ucla.edu/icount-project/>
- <sup>23</sup> CARE and APIASF. (2011). The Relevance of Asian Americans & Pacific Islanders in the College Completion Agenda. Retrieved from [https://apiascholars.org/wp-content/uploads/2019/04/2011\\_CARE\\_Report.pdf](https://apiascholars.org/wp-content/uploads/2019/04/2011_CARE_Report.pdf)
- <sup>24</sup> Teranishi, R. & Alcantar, C. (2019). Exploring the Impact of AANAPISI GrantFunded Programs on Student Experiences and Outcomes: A Report on UNLV. APIA Scholars. Retrieved from [https://apiascholars.org/wp-content/uploads/2019/10/UNLV\\_Report.pdf](https://apiascholars.org/wp-content/uploads/2019/10/UNLV_Report.pdf)
- <sup>25</sup> Pech, C., De-La Cruz Viesca, M., Calderon, C. & Ong, P. (2021). Crisis to Impact: Reflecting on a Decade of Housing Counseling Services in Asian American and Pacific Islander Communities. Retrieved from [https://www.nationalcapacd.org/wp-content/uploads/2021/03/NationalCAPACD\\_HousingCounselingReport\\_final\\_031221.pdf](https://www.nationalcapacd.org/wp-content/uploads/2021/03/NationalCAPACD_HousingCounselingReport_final_031221.pdf)
- <sup>26</sup> Department of Justice. (2016). Combating Religious Discrimination Today: Final Report. Retrieved from <https://www.justice.gov/crt/file/877936/download>
- <sup>27</sup> SAALT. (2001). American Backlash: Terrorists Bring War Home in More Ways Than One. Retrieved from <http://saalt.org/wp-content/uploads/2012/09/American-Backlash-Terrorist-Bring-War-Home-in-More-Ways-Than-One.pdf>
- <sup>28</sup> SALDEF. (2020). 2020 National Sikh American Survey. Retrieved from <https://saldef.org/national-sikh-survey-results/>



- <sup>29</sup> Stop AAPI Hate. Retrieved from <https://stopaapihate.org/>
- <sup>30</sup> Ascend Foundation. (2016). Lost in Aggregation: The Asian Reflection in the Glass Ceiling. Retrieved from <https://www.ascendleadershipfoundation.org/research/lost-in-aggregation>
- <sup>31</sup> Ascend Foundation. (2020). Race, Gender & The Double Glass Ceiling: An Analysis of EEOC National Workforce Data. Retrieved from <https://www.ascendleadershipfoundation.org/research/race-gender-double-glass-ceiling>
- <sup>32</sup> Advancing Justice-Asian Law Caucus. (2016). Why Asian-Pacific Islanders Care About Incarceration. Retrieved from [https://medium.com/@anoop\\_alc/why-asian-pacific-islanders-care-about-incarceration-8d298fa4324c](https://medium.com/@anoop_alc/why-asian-pacific-islanders-care-about-incarceration-8d298fa4324c)
- <sup>33</sup> SEARAC. (2015). Retrieved from [https://www.searac.org/wp-content/uploads/2018/04/18877-AAPIs-Behind-Bars\\_web.pdf](https://www.searac.org/wp-content/uploads/2018/04/18877-AAPIs-Behind-Bars_web.pdf)
- <sup>34</sup> Press Release: Thousands in AA and NHPI Community Urge MB to Support re Detailed Data. Retrieved from <https://www.apiahf.org/press-release/thousands-in-aa-and-nhpi-community-urge-omb-to-support-more-detailed-data/>
- <sup>35</sup> EPIC. (2014). Policy Platform for Native Hawaiians and Pacific Islanders in the United States. Retrieved from [https://drive.google.com/file/d/16UmcINx1P5tz3N2WFOErwGevwXJc\\_qi9/view?usp=sharing](https://drive.google.com/file/d/16UmcINx1P5tz3N2WFOErwGevwXJc_qi9/view?usp=sharing)
- <sup>36</sup> EPIC & Advancing Justice-Los Angeles. (2014). A Community of Contrasts: Native Hawaiians and Pacific Islanders in the United States. <https://static1.squarespace.com/static/5ef63030d9999309b65e3c91/t/6115277a7e4218049cc9d8b6/1628776334313/NHPI+Demographic+Profile+%28National%29.pdf>
- <sup>37</sup> President's Advisory Commission on Asian Americans and Pacific Islanders. (2001). Asian Americans and Pacific Islanders: A People Looking Forward: Action for Access and Partnerships in the 21st Century: Interim Report to the President and the Nation.
- <sup>38</sup> Exec. Order No. 13339, 69 Fed. Reg. 28035 (May 17, 2004).
- <sup>39</sup> White House Initiative on Asian Americans and Pacific Islanders. (2011). *Winning the Future: A Road Map for the Asian American and Pacific Islander Community*. U.S. Dept. of Education.
- <sup>40</sup> Ibid
- <sup>41</sup> Harris-Kojetin, B. (2012). *Federal Agency Approaches to Providing Statistical Information on Detailed Asian and Native Hawaiian and Other Pacific Islander Groups*. Office of Management and Budget. [https://obamawhitehouse.archives.gov/sites/default/files/docs/omb\\_spwp\\_on\\_detailed\\_race\\_groups\\_final\\_8-7-12.pdf](https://obamawhitehouse.archives.gov/sites/default/files/docs/omb_spwp_on_detailed_race_groups_final_8-7-12.pdf)
- <sup>42</sup> White House Initiative on Asian Americans and Pacific Islanders. (2014). Building the American Mosaic: A Report from the President's Advisory Commission on Asian Americans and Pacific Islanders. U.S. Department of Education.
- <sup>43</sup> White House Initiative on Asian Americans and Pacific Islanders. (2020). Advancing Economic Empowerment for Asian Americans and Pacific Islanders: A Call to Action. Report of the President's Advisory Commission on Asian Americans and Pacific Islanders. U.S. Department of Commerce.

<sup>44</sup> Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. 86 Fed. Reg. 7009 (Jan. 20, 2021). <https://www.federalregister.gov/d/2021-01753>

<sup>45</sup> Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders. 86 Fed. Reg. 29675 (May 28, 2021). <https://www.federalregister.gov/d/2021-11792>

<sup>46</sup> Presidential COVID-19 Health Equity Task Force: Final Report and Recommendations. (2021). <https://www.minorityhealth.hhs.gov/HETFReport>

<sup>47</sup> Office of Management and Budget. (2021) Study to Identify Methods to Assess Equity: Report to the President. [https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation\\_508-Compliant-Secure-v1.1.pdf](https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation_508-Compliant-Secure-v1.1.pdf)

<sup>48</sup> A Vision for Equitable Data: Recommendations from the Equitable Data Working Group. (2022). <https://www.whitehouse.gov/wp-content/uploads/2022/04/eo13985-vision-for-equitable-data.pdf>

<sup>49</sup> Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. 81 Fed. Reg. 67398. (Sep. 30, 2016). <https://www.federalregister.gov/d/2016-23672>

<sup>50</sup> Federal Interagency Working Group for Research on Race and Ethnicity. (2017). Interim Report to the Office of Management and Budget: Review of Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. OMB-2017-0003-0055. <https://www.regulations.gov/document/OMB-2017-0003-0055>

<sup>51</sup> League of Women Voters (2022). Census Sign-on letter to OMB re revision of race and ethnicity data standards. Retrieved from <https://www.lwv.org/sites/default/files/2022-03/census%20Sign-on%20letter%20to%20OMB%20re%20revision%20of%20race%20and%20ethnicity%20data%20standards.pdf>

<sup>52</sup> U.S. Census Bureau. (2019) 2020 Census Partnership Plan. Retrieved from <https://www2.census.gov/programs-surveys/decennial/2020/partners/2020-partnership-plan.pdf>

<sup>53</sup> See the Census Bureau's response to Recommendation 27 here: <https://www2.census.gov/about/partners/cac/nac/meetings/2021-05/nac-spring-2021-recommendations.pdf>

<sup>54</sup> U.S. Census Bureau. (2022) Census Partners. Retrieved from <https://www.census.gov/partners.html>

<sup>55</sup> U.S. Census Bureau. (2022) Census Scientific Advisory Committee. Retrieved from <https://www.census.gov/about/cac/sac.html>

<sup>56</sup> U.S. Census Bureau. (2022) National Advisory Committee. Retrieved from <https://www.census.gov/about/cac/nac.html>

<sup>57</sup> Santos, R. (2022, May, 5). Census Bureau Transformation and Modernization Activities, U.S. Census Bureau. <https://www2.census.gov/about/partners/cac/nac/meetings/2022-05/presentation-census-bureau-transformation-and-modernization.pdf>

- <sup>58</sup> National Advisory Committee for Census Bureau. NAC Recommendations March 7, 2022 Special Meeting on Differential Privacy. <https://thecensusproject.org/2022/03/21/latest-national-advisory-committee-recommendations-on-differential-privacy/>
- <sup>59</sup> U.S. Census Bureau. (2022) Census Academy. Retrieved from <https://www.census.gov/data/academy.html>
- <sup>60</sup> U.S. Census Bureau. (2022) My Community Explorer. Retrieved from <https://experience.arcgis.com/experience/13a111e06ad242fba0fb62f25199c7dd/page/Page-1/>
- <sup>61</sup> U.S. Census Bureau. (2022). Census Information Center (CIC). Retrieved from <https://www.census.gov/about/partners/cic.html>
- <sup>62</sup> Ponce, N.A., Bautista, R., Sondik, E.J., Rice, D., Bau, I., Ro, M.J., & Tseng, W. (2015). Championing Partnerships for Data Equity. *Journal of Health Care for the Poor and Underserved*, 26(2), 6-15. <https://doi.org/10.1353/hpu.2015.0058>
- <sup>63</sup> National Center for Health Statistics. (2022). Native Hawaiian and Pacific Islander (NHPI) National Health Interview Survey (NHIS). Retrieved from <https://www.cdc.gov/nchs/nhis/nhpi.html>
- <sup>64</sup> Interdepartmental Health Equity Collaborative (IHEC). (2019). Compendium Of Federal Datasets Addressing Health Disparities. Office of Minority Health, Dept. of Health and Human Services. [https://www.minorityhealth.hhs.gov/assets/pdf/2019%20IHEC%20Data%20Compendium\\_Full\\_Document\\_RegularFormat%20-%207-20-20.pdf](https://www.minorityhealth.hhs.gov/assets/pdf/2019%20IHEC%20Data%20Compendium_Full_Document_RegularFormat%20-%207-20-20.pdf)
- <sup>65</sup> Dept. of Labor. (2022). Department of Labor Equity Action Plan. <https://www.dol.gov/general/equity-action-plan/plan#1>
- <sup>66</sup> White House. (2021) FACT SHEET: President Biden Announces Additional Actions to Respond to Anti-Asian Violence, Xenophobia and Bias. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/30/fact-sheet-president-biden-announces-additional-actions-to-respond-to-anti-asian-violence-xenophobia-and-bias/>
- <sup>67</sup> Department of Justice. (2022). Raising Awareness of Hate Crimes and Hate Incidents During the COVID-19 Pandemic. Retrieved from <https://www.justice.gov/hatecrimes/addressing-hate-crimes-against-AAPI>
- <sup>68</sup> Magsaysay, Raymond, Asian Americans and Pacific Islanders and the Prison Industrial Complex (February 24, 2021). 26 Michigan Journal of Race & Law 443, Available at SSRN: <https://ssrn.com/abstract=3792596>
- <sup>69</sup> Department of Justice Equity Action Plan. (2022). Retrieved from <https://www.justice.gov/doj/page/file/1494516/download>
- <sup>70</sup> Request for Information To Gather Technical Expertise Pertaining to the Disaggregation of Asian and Native Hawaiian and Other Pacific Islander Student Data and the Use of Those Data in Planning and Programmatic Endeavors. 77 Fed. Reg. 26531 (May 04, 2012). <https://www.federalregister.gov/d/2012-10835>
- <sup>71</sup> National Forum on Education Statistics. (2016) Forum Guide to Collecting and Using Disaggregated Data on Racial/Ethnic Subgroups. <https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=NFES2017017>
- <sup>72</sup> Dept. of Education. (2022). Civil Rights Data. <https://www2.ed.gov/about/offices/list/ocr/data.html>
-

<sup>73</sup> National Academies of Sciences, Engineering, and Medicine. 2019. Monitoring Educational Equity. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25389>

<sup>74</sup> Corey, K. (2017). Housing needs of Native Hawaiians : a report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs. U.S. Department of Housing and Urban Development, Office of Policy Development and Research.

<sup>75</sup> <https://www.hudexchange.info/resource/5787/coc-analysis-tool-race-and-ethnicity/>

<sup>76</sup> HUD (2020, July). <https://files.hudexchange.info/resources/documents/Data-and-Equity-Using-the-Data-You-Have.pdf>

<sup>77</sup> For more information, see <https://www.ssa.gov/policy/docs/rsnotes/rsn2016-01.html>

<sup>78</sup> Equal Employment Opportunity Commission (EEOC). Job Patterns For Minorities And Women In Private Industry (EEO-1). Retrieved from <https://www.eeoc.gov/statistics/employment/jobpatterns/eeo1>

<sup>79</sup> Equal Employment Opportunity Commission (EEOC). (2022). Federal Sector Reports. Retrieved from <https://www.eeoc.gov/federal-sector/reports>.

<sup>80</sup> The Continuing Impact of Pay Discrimination in the United States. Office of Enterprise Data and Analytics (OEDA) Data Highlight No. 1. U.S. Equal Employment Opportunity Commission (EEOC), Washington, DC, March 2022. Retrieved from <https://www.eeoc.gov/continuing-impact-pay-discrimination-united-states>.

<sup>81</sup> Sexual Harassment in Our Nation's Workplaces. Office of Enterprise Data and Analytics (OEDA) Data Highlight No. 2. U.S. Equal Employment Opportunity Commission (EEOC), Washington, DC, April 2022. Retrieved from <https://www.eeoc.gov/sexual-harassment-our-nations-workplaces>.

<sup>82</sup> Equal Employment Opportunity Commission (EEOC). (2022). Selected Case Lists. Retrieved from <https://www.eeoc.gov/selected-case-lists>.

<sup>83</sup> The DNA: Data, Narrative, Action framework was initially developed in Summer 2018 by the Center for Social Innovation at University of California, Riverside under the direction of Karthick Ramakrishnan, and the framework has since been adopted by AAPI Data in its outreach and capacity building work.

<sup>84</sup> Equitable Data Working Group (White House). 2022. *A Vision for Equitable Data Recommendations from the Equitable Data Working Group*, p. 12.

<sup>85</sup> These include the need for studies on the disproportionately high rates of COVID-19 deaths among Filipino nurses and among Southeast Asian and Pacific Islander communities in particular geographies

<sup>86</sup> AAPI Data. (2021). Call to Action: 2020 Census and Data Equity for AAPIs. December 15. Retrieved from <https://aapidata.com/blog/data-equity-2020census/>

<sup>87</sup> Race categories are based on the 1997 OMB standards on race and ethnicity, see <https://www.govinfo.gov/app/details/FR-1997-10-30/97-28653>

# ACKNOWLEDGMENTS

We are grateful for the assistance and advice of a number of the individuals and organizations listed below, and we look forward to working in partnership with a number of federal agencies to continue the important work ahead, to embed and advance data equity as a set of policies, practices, norms, and investments in as many agencies and programs as possible.

Julie Ajinkya, APIA Scholars

Terry Ao Minnis, Asian Americans Advancing Justice | AAJC

Daisy Kim, Asian and Pacific Islander American Health Forum (APIAHF)

Kham Moua, Southeast Asia Resource Action Center (SEARAC)

Gregg Orton, National Council of Asian Pacific Americans (NCAPA)

Ninez Ponce, UCLA Center for Health Policy Research

Tavae Samuelu, Empowering Pacific Islander Communities (EPIC)

Emma Shainwald, National Council of Asian Pacific Americans (NCAPA)

Sina Uipi, Empowering Pacific Islander Communities (EPIC)

Akil Vohra, Asian American LEAD

We are grateful to the Blue Shield of California Foundation, Henry Luce Foundation, Hewlett Foundation, Skoll Foundation, and Wallace H. Coulter Foundation for their financial support of AAPI Data and making reports like this possible. AAPI Data bears sole responsibility for any errors of fact or interpretation contained in this report.

