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Mr. Bob Sivinski
Chair, Interagency Technical Working Group on Race and Ethnicity Standards
Executive Office of the President
Office of Management and Budget
725 17th St. NW, Washington, DC 20503

April 27, 2023

RE: OMB-2023-0001, “Initial Proposals for Updating OMB’s Race and Ethnicity Statistical Standards”

Dear Mr. Sivinski,

Thank you for the opportunity to respond to the RFI: Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards. I write on behalf of the Federation of Associations in Behavioral and Brain Sciences (FABBS), a coalition of 29 scientific societies and 60 academic departments that come together to equitably advance the rigor, impact, and accessibility of our disciplines. Accordingly, these comments reflect the perspective of researchers using the federal statistical data on race and ethnicity as well as the expertise of our members who study all aspects of race including bias, stigma, and social determinants of health.

FABBS applauds the White House Office of Management and Budget (OMB) effort and the Interagency Technical Working Group on Race and Ethnicity Standards (Working Group) for your work to revise and update OMB’s 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). FABBS supports the proposed changes and welcomes the progress to more accurately reflect the current diversity across the U.S. As researchers, we appreciate the collection of more extensive data from survey respondents.

While fully supportive of these efforts to improve upon these statistical standards, as well as the value of categories for the sake of measurement and research, FABBS is compelled to underscore the limitations of race and ethnicity as social constructs rather than biologically determined. The written concept of race, as it is commonly used today, did not exist until the 17th century. Prominent philosophers and scientists at the time wrongly argued that race was a biological construct and claimed that there are genetically distinct human races.¹ Accordingly, FABBS would argue that there are some inherent limitations to the categories of race and ethnicity. Furthermore, FABBS

¹ [Download: Advancing Antiracism, Diversity, Equity, and Inclusion in STEM Organizations: Beyond Broadening Participation | The National Academies Press](#)



anticipates that these constructs will become increasingly difficult to measure, and despite continual improvement, may eventually be rendered inaccurate.

This response reflects input from FABBS members, specifically Dr. Robert Sellers and Dr. Sandra Graham. Overall, we want to establish support for the effort, and underscore the importance of these conversations. In the interest of the communities we reach, we recommend the following in response to the Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards:

1. Implement a combined race and ethnicity question.

FABBS supports the proposed change to combine race and ethnicity into one question. As researchers, we see the value of additional information to enable a more accurate measurement standpoint. We note that race and ethnicity are not easily separable constructs. FABBS recognizes that this change will create complications for longitudinal analysis. Nonetheless, we think that value of improving accuracy and inclusiveness outweighs the disruption to longitudinal data.²

FABBS would like to point out that the new model does not adequately allow for people to identify as Multiracial or Multiethnic. Agencies should be instructed to not utilize a “two or more” category. Instead, agencies should ask questions such as, *which of these identities best represent your identity, are there any others?* It is important to go through the effort to try to understand all of the facets of the respondents' identity.

2. Add “Middle Eastern or North African” (MENA) as a new minimum category.

FABBS supports the addition of “Middle Eastern or North African” (MENA) as a new minimum category, allowing these individuals to differentiate from identifying as White. As mentioned in the RFI, many people in the MENA category do not identify as White or share the same lived experience as White people with European ancestry. In a recent workshop entitled “Understanding Ontologies in Context”, Dr. Sandra Galea pointed out that it is currently “hard to see ethnic and cultural differences of MENA as compared to other Americans, because there are currently no markers in surveys.”³ FABBS believes that updating these standards would allow us to further understand the life experiences of those individuals identifying as MENA.

3. Require the collection of detailed race and ethnicity categories by default.

FABBS strongly encourages the SPD 15 to require data collection on race and ethnicity, following the example in Figure 2, which has the minimum categories disaggregated by country of origin. FABBS researchers have often raised the limitations of the broad category for Asians, masking significant disparities in health and socioeconomic status associated with country of origin. Recognizing the complexity of doing so, FABBS believes that it is quite important to consider immigration status, in terms of the number of generations in the country. We realize that people may identify differently based on

² Sanchez, D. T., Gaither, S. E., Albuja, A. F., & Eddy, Z. (2020). How Policies Can Address Multiracial Stigma. *Policy Insights from the Behavioral and Brain Sciences*, 7(2), 115–122. <https://doi.org/10.1177/2372732220943906>

³ [Understanding Ontologies in Context Workshop 2 | National Academies](#)



when and how they or their families came to the US. This may result in the need to ensure detailed information on groups beyond the minimum proposed in Figure 2.

4. Update Terminology in SPD 15. The working Group proposes that SPD 15 make the following changes regarding terminology.

FABBS recommends implementation of all proposed changes. The Working Group proposes that SPD 15 discontinue use of the terms “majority” and “minority” unless being used in the strict definition of these terms, numerically (i.e., numerical majority or numerical minority group). It is inaccurate and minimizing to refer to all non-White populations as minority groups. Instead, FABBS encourages the incorporation of terminology such as “historically underrepresented” to describe individuals from diverse backgrounds that have faced barriers as a result of discriminatory policies.

5. Guidance is necessary to implement SPD 15 revisions on Federal information collections.

FABBS strongly believes that observations should never be used to identify race and ethnicity when self-identification is not possible. Although a person's perceived race may be highly relevant to their lived experience, it is a distinct datum from their self-described race or ethnicity. All federal programs should clarify reasons for collecting the data, as this builds trust from respondents and promotes information quality.

6. Future work for the taskforce:

While FABBS deeply appreciates the steps being taken, we maintain that there is still work to be done in the future. Most notably, we would like to underscore that identity is intersectional. In the future, the task force should include other identifying factors such as gender, sexual orientation, and disability status, at minimum. It is important to take all of these aspects into consideration when determining health outcomes for groups.

Additionally, the task force should examine the underlying theory for why this is important and what we are trying to understand. For example, are these data being used to try to improve health services? FABBS also sees value in creating a standardized measure of immigrant status, using measures such as 1st or 2nd generation, and parental birthplace.

Many thanks for considering this input. FABBS is eager to be a resource regarding this topic in the future. Please do not hesitate to call on us at jbaron@fabbs.org or 202.669.4834.

Sincerely,

Juliane Baron
Executive Director