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April 4, 2023

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

Ms. Karen Battle
Co-Chair
Interagency Technical Working Group
on Race and Ethnicity Standards
1650 17th Street, NW
Washington DC 20500:

Dear Mr. Sivinski and Ms. Battle:

I am writing to convey the comments of Knowledge Alliance on the initial proposals of the Federal Interagency Technical Working Group on Race and Ethnicity Standards (the Working Group) for revising OMB's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). Knowledge Alliance, a non-partisan, non-profit organization, is composed of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Collectively, KA and its members have spent the last 50 years supporting a set of education programs focused on building and disseminating evidence to improve teaching and learning in the nation's classrooms. We believe in the power of data, including data on race and ethnicity, to help us understand and improve teaching, learning and equity.

Further, our members have vast experience implementing, analyzing, and using the surveys supported by the National Center for Education Statistics (NCES or the Center), the evaluations supported by the U.S. Department of Education, and other national data collections that involve the collection and use of data on race and ethnicity. I thus believe we bring an important, indeed critical, perspective to the issues raised by the Working Group's initial proposals.

As the Working Group moves ahead with its deliberations on potential changes to SPD 15, we recommend that you pay particular attention to the following considerations:

- **KA believes that refining the scope of collected data with an end goal of the full representation of all groups can bring significant benefits by allowing more groups to be seen.** By gathering comprehensive data, we can gain a better understanding of the diverse experiences and perspectives of different groups, which can help us identify and address disparities and improve equity. Further it is an important goal to ensure that the end users the data is intended to help feel seen in the data and analyses. In turn, this can lead to more inclusive policies and programs that better meet the needs of all individuals, regardless of their race or ethnicity. Therefore, it is important to prioritize data collection efforts that allow for the full representation of all groups in order to achieve a more equitable society.
- **It is critical that in the pursuit of full representation, we strike the right balance of achieving this aim while not impeding or reversing progress on collecting and**

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reporting meaningful, accurate, and useful data. While it might be appropriate to revise definitions and data collection protocols in response to societal changes, doing so carries risks of losing historical trend data and experiencing gaps in time series as data collections and reporting transition from one set of standards to another. For the education research community, and indeed for education writ large, historical and longitudinal data on the educational experiences of and outcomes for different racial and ethnic groups provide a critical indicator of the performance of the education system and of the challenges facing that system.

With those considerations in mind, Knowledge Alliance takes the following positions on the initial Working Group recommendations.

- **We oppose the proposal to change from collecting race and ethnicity data through a two-question format to collecting those data through a one-question format (that is, to delete the separate question on whether an individual is Hispanic or non-Hispanic).** KA is concerned about a potential reduction in data quality based on NCES' analysis that doing so would lead to fall-offs in validity and reliability with regard to individuals of two or more races and for members of the American Indian/Alaska Native population who are also Hispanic. KA also takes note that NCES believes a change from a two-question format to a one-question format would result in a loss of important historical trend data on Hispanic Americans, particularly on their racial status. We therefore recommend that the working group consider adopting NCES's strategy of reducing the rate of non-responses to the racial question (for Hispanic responses) through the inclusion of additional data prompts
- **We support the use of the expanded set of minimum ethnic group reporting categories, as illustrated in the Table 2 of the Working Group's request for comments, but do not support making the expanded set of groups a mandatory data collection requirement.** Implementation of the Working Group's proposal would allow a finer disaggregation of data than is generally possible with current reporting, and the expanded data would be of interest and use to researchers and practitioners. However, depending on the survey, the expansion of groups would likely lead to the data cells for many groups having small "n sizes" and thus being inappropriate to use for policy-making or program implementation. Further, as with any other change in data standards, there would be issues of validity and reliability. Thus, we recommend that the expanded list of groups be tested carefully over time, starting with surveys where the use of such a list is most likely to be productive.
- **We support the Working Group's recommendations on terminology,** including removing the word "Negro" from the "Black or African American" definition, deleting "Far East" from the "Asian American" definition, removing "Other" from "Native Hawaiian or Other Pacific Islander, and no longer requiring those who identify as American Indian or Alaska Native" to have a continuing attachment to a tribe or indigenous community.

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These changes would make the language of the standards more consistent with current usage and practices.

Thank you for the opportunity to comment on this important potential change in Federal statistical policy. If I can be of any other assistance, please do not hesitate to contact me.

Sincerely,



Rachel Dinkes