

MOTION BY SUPERVISORS HILDA L. SOLIS

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Aligning County Demographic Data Collection with New Federal Census

Requirements

For the nation to operate efficiently and effectively, it relies on the continuous flow of objective and credible statistics. Among these, data on race and ethnicity are a vital tool for government officials, assisting in making informed decisions regarding the equitable allocation of resources and provision of services to communities with diverse and varied needs.

Statistical Policy Directive No. 15, referred to as SPD 15, was issued by the United States' Office of Management and Budget (OMB) in 1977. SPD 15 sets standards for how federal agencies collect, maintain, and present racial and ethnic data. It defines guidelines for classifying individuals into these categories and establishes minimum reporting requirements for federal data collection. The goal of SPD 15 is to provide consistent and standardized methods for collecting and reporting data on race

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and ethnicity.¹

In 1997, OMB updated SPD 15, which invertedly resulted in less accurate data on the nation's race and ethnicity, particularly for the Latino population. The revision required a two-question approach, first asking respondents if they were of Hispanic, Latino, or Spanish origin, followed by a separate question about their race. However, many Latino respondents struggled with the concept of race and either left the question blank or selected the "some other race" option when it was available, which according to OMB, does not exist as a racial group. Consequently, the Census Bureau had to assign a racial category to those that selected "some other race", leading to inaccurate categorization. In 2020, 27 million Latinos selected the "some other race" category, resulting in their placement in racial categories they may not necessarily belong to.²

Recognizing the need to improve SPD 15 to address evolving demographic changes and to ensure more accurate and inclusive data collection, OMB has approved major updates that went into effect March 28, 2024. The changes encompass several key revisions:

1. Collect Race and Ethnicity Information Using One Combined Question
 - a. The first update to SPD 15 involves merging race and ethnicity information into a single question. OMB's decision to combine separate questions stems from strong evidence suggesting that the combined format yields more practical and higher-quality data.
2. Add Middle Eastern or North African as a New Minimum Category

¹ <https://www.federalregister.gov/documents/2024/03/29/2024-06469/revisions-to-ombs-statistical-policy-directive-no-15-standards-for-maintaining-collecting-and>

² [Webinar: The Revised OMB Ethnicity and Race Standards: An Opportunity to Illuminate the Full Diversity of the Latino Population - Zoom](#)

- a. The second revision to SPD 15 includes creating a new minimum reporting category that includes “Middle Eastern or North African” (MENA). Previously, MENA respondents were defined and tabulated within the white racial category. This update will make individuals who identify as MENA more visible in data.
3. Require the Collection of Detailed Race and Ethnicity Categories as a Default
 - a. The third revision requires that agencies collect detailed race/ethnicity data beyond the minimum categories. The minimum categories include American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Middle Eastern or North African, Native American or Pacific Islander, and White. If a respondent identifies as Hispanic or Latino, they must be provided with detailed subcategories such as Mexican, Puerto Rican, Salvadoran, Cuban, Dominican, Guatemalan, or another group (e.g., Colombian, Honduran, Spaniard, etc.) to select from.
4. Updates to Question Stem and Instructions
 - a. OMB's research indicates that using "race/ethnicity" terminology is preferable over alternatives such as "race/origin" or "categories" for a combined question. Therefore, the fourth revision includes updating SPD 15 to feature the question stem "What is your race and/or ethnicity?" Additionally, the revised SPD 15 informs respondents that they can select multiple race/ethnicity groups, stating: "Select all that apply and enter additional details in the spaces below."
5. Updates on Terminology and Definitions

- a. The fifth revision to SPD 15 includes updated race/ethnicity terminology and definitions. Changes include removing outdated language and correcting errors such as listing “Cuban” twice in the Hispanic or Latino category. Additionally, the updated SPD 15 now requires using “Multiracial and/or Multiethnic” instead of “Two or More Races” for respondents identifying with multiple categories.

While the revisions to SPD 15 primarily impact federal data collection efforts, aligning data collection methods on race and ethnicity between local and federal governments would generate more accurate and informative data. This improved data would then play a pivotal role in informing vital governmental functions, including economic, health, and housing policy formulation.³ Therefore, the Board of Supervisors should review the data collection practices of its 38 Departments to ensure comprehensive data collection on race and ethnicity and promote equity in policy making decisions.

WE, THEREFORE, MOVE that the Board of Supervisors direct the Chief Executive Office, through the Anti-Racism, Diversity, and Inclusion Initiative (ARDI), in collaboration with the Chief Information Office (CIO) and all 38 County Departments to report back in 180 days with a review of County demographic data collection practices and recommendations to determine how best to align with federal standards, best practices and a data justice approach on the collection of race, ethnicity, and cultural data. This report should include the following:

³ <https://healthlaw.org/a-win-for-representation-in-data-new-federal-race-and-ethnicity-standards-modernize-demographic-data-collection-and-advance-health-equity/#:~:text=Alignment%20to%20SPD%2015%20is,other%20critical%20functions%20of%20government.>

1. Comprehensive review of demographic categories used by Departments to collect race, ethnicity, and cultural data. This review should highlight discrepancies and alignment across Departments as it relates to demographic data.
2. Assessment of the feasibility of aligning County demographic data collection practices with Federal guidelines.
3. Recommendations for implementing new data collection practices across County Departments to ensure accuracy and promote equity.

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