The Office of the U.S. Chief Statistician
Office of Information and Regulatory Affairs
Office of Management and Budget
9th Floor, 1800 G Street, N.W.
Washington, D.C. 20503
Race-Ethnicity@omb.eop.gov

Dear Dr. Nancy Potok:

I am writing in response to the Federal Register notice Vol. 82, No. 39 published on Wednesday March 1, 2017 regarding the "Proposals from the Federal Interagency Working Group for Revision of the Standards for Maintaining, Collecting and Presenting Federal Data on Race and Ethnicity."

I. Classification of Middle Eastern or North African Category
   a. MENA is an Ethnicity: If MENA is collected as a separate reporting category, **MENA must be considered an ethnicity.** We maintain that persons with origins in the MENA region (**much like those of Hispanic origin)** identify with many racial backgrounds and that ethnicity is the appropriate approach to this new category.
   b. Conditional Minimum Reporting Category: As an ethnic classification, the MENA category must be treated equally and not be subsumed under any other major OMB tabulation category. The MENA ethnicity category must become a required minimum reporting category **if the sample size is sufficient to meet the threshold requirement for no disclosure risk and reporting given that guidance is provided to all collection agencies.**
   c. Special Groups: All groups with origins from the Middle East and North Africa who self-identify with this region (such as **Assyrian/Chaldean, Coptic, or Druze)** must be included in the MENA ethnic category. The Census Bureau already collects and reports information on the largest group Assyrian/Chaldean while others (e.g. Coptic and Druze) have been invisible within the MENA population.
   d. MENA Definition: (a) Like any other major OMB tabulation category, the MENA ethnic category must represent persons with origins in the Middle East and North African regardless of their nativity status or parental place of birth; and (b) We request that the IWG and OMB adopt a comprehensive geographic definition of the MENA category that includes the population with origins in the ***League of Arab States*** (Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen); ***Non-Arab MENA States*** (Turkey, Iran and Israel) and ***Trans-national communities*** (Assyrians/Chaldeans, Kurds, Berber, etc.).

II. Cost, Burden and Security: (a) Requiring an additional reporting category for MENA across federal information collections recognizes this growing American ethnic population that has been mostly invisible in federal statistics and reports, and yet remains hyper-visible in our country's political, policy, law enforcement and security arenas. We believe accurate and inclusive data collection on the MENA population will inform policymakers, federal and

local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues. (b) Given the estimated size of the MENA group, a separate reporting category should be required when reporting allows for statistically reliable estimates because collecting data with a high margin of error is useless; (c) A separate reporting category should be required when reporting meets the requirement for no disclosure risk and **does not risk the confidentiality or privacy of the MENA population;** (d) We request assurances that all laws protecting confidentiality be strictly enforced with significant penalties on breaching confidentiality. Furthermore, when special tabulations are requested beyond what is publically available, mechanisms that ensure transparency must be maintained.

III. Additional Minimum Reporting Categories: In addition to the groups listed in the FRN, we recommend that OMB issues specific guidelines for the collection of detailed ethnicity data for MENA as follows:

a. If issuing specific guidelines for the collection of detailed MENA ethnicity data, OMB should NOT adopt the NCT format, which treats the Middle East and North Africa as two separate regions, and further divides the Middle East into Arab and Non-Arab. Instead, we recommend that the OMB treat the region as one geography that is very complex and diverse, and that the sub-boxes be assigned to the largest groups by population in the U.S. (Lebanese, Iranian, Egyptian, Syrian, Iraqi and Israeli) while using the examples to include an trans-national group (e.g. Assyrian/Chaldean), a Gulf population (Yemeni) and an Arabic-speaking country in sub Saharan Africa (Sudan).

III. Questionnaire Format and Information Quality: (a) We strongly support a combined question format which treats the MENA ethnicity as equal to all OMB categories; (b) when evaluating anticipated information quality, additional testing should be considered on the MENA ethnic category to achieve the following: i) should the separate questions format be adopted, the MENA category must be tested in the ethnic origin question (which was not achieved in the NCT); ii) the MENA question should be tested along with removing the Somali example from the Black/African American question in all formats; iii) the MENA question should be tested with examples that include Sudanese, Somali and Nubian as well as Assyrian/Chaldean.

Thank you for your attention to this important matter.

YOUR SIGNATURE AND AFFILIATION (if applicable).