

**Attention: Information No Longer Current
(Alert archived November 2011)**

Alert #6

Subject: New Federal Standards for Racial and Ethnic Data Collection and Reporting

Prepared: April 1998

Revised: May 28, 1998

Revised: June 2, 1998

Summary

- Note: Given the importance of this topic and its implications across institutions, it is recommended that copies of this Alert be distributed to those with responsibility for admissions, data systems, computer services, financial aid, human resources, and student records.

The racial and ethnic background of the U.S. population is steadily changing. Record high immigration rates since the 1980's have lent increasing variety in the United State's population as immigrants arrive from countries and regions of the world not previously represented. Increasing interracial marriage also has resulted in a society which is more multiethnic and multiracial than before.

Racial data have been collected in many forms by the Federal Government for more than 200 years. The first formal standards for racial/ethnic data and reporting were developed during the mid-1970's and put into practice in 1977. However, following the 1990 Census dissatisfaction grew both with the inability of these categories to allow individuals to accurately describe their racial or ethnic heritages and with the inability of the resulting data to accurately capture the growing demographic complexity of the United States.

In 1993, the Office of Management and Budget (OMB) formally began to undertake a full review of the standards for collecting, analyzing, and reporting all government data which depicted racial and ethnic backgrounds. In 1994, OMB established the Interagency Committee for the Review of Racial and Ethnic Standards, representing more than 30 federal agencies, to make recommendations about how the nation might more fully capture racial and ethnic backgrounds. The resulting OMB standards summarized in this Alert apply to all federally collected data and reporting, including all levels of education, the national census, medical research, disease statistics, drawing boundaries for Congressional districts, the Voting Rights Act, and compliance with federal law and statutory regulations.

Current Status

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After several years of extensive discussion, research, and debate, OMB published in the Federal Register on July 9, 1997, an initial set of recommendations from the Interagency Committee and invited public comment on them through September 8, 1997. On October 30, 1997, OMB again published in the Federal Register a set of revisions to the initial (1977) standards, thereby "announcing its decisions concerning the revision of Statistical Policy Directive No. 15, Racial and Ethnic Standards for Federal Statistics and Administrative Reporting." The new standards became effective "immediately" for "all new and revised federal record keeping or reporting requirements that include racial and/or ethnic information." Further, "all existing record keeping or reporting requirements shall be made consistent with these standards . . . not later than January 1, 2003." OMB currently has three working groups (forms, tabulations, and policy) considering various technical aspects of reporting racial and ethnic data under the new standards. Just as OMB's process for adopting the new standards has benefited from extensive public participation, OMB expects to discuss tabulation methods with data users within and outside the Federal Government. Final tabulation guidelines are expected to be issued before the end of 1998.

The fundamental challenge for institutions and institutional researchers inherent in the revised OMB standards can be summarized across two broad areas, data collection and reporting.

Data Collection

- There will continue to be collection and reporting of demographic data on racial and ethnic background, as well as continued analysis and reporting of a wide variety of other data according to racial and ethnic background.
- Self-reporting or self-identification is the preferred method for data collection and should be used wherever feasible.
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- The original racial category "Asian or Pacific Islander" was split into two categories, "Asian" and a "Native Hawaiian or Other Pacific Islander." The exact wordings for most of the other new categories were also changed.

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- The original racial category "American Indian or Alaska Native" was expanded to include any of the original peoples of South America (including Central America).
- The OMB standards provide definitions for each ethnic and racial category. The full text of these is found in the Federal Register of October 30, 1997, p. 58789 (see references below).
- There are two acceptable protocols for collecting ethnic and racial data by the Federal Government, the "Separate Format" and the "Combined Format." These are summarized immediately below.
- The Separate Format
 - The separate format should be used when racial and ethnic data are collected through the preferred method, that is, self-identification.
 - When self-identification is used, the separate format employs two separate questions, one for reporting data on Hispanic ethnicity, and one for racial data.
 - The question on Hispanic ethnicity should be asked first, followed by the question requesting racial self-identification.
- The minimum standards for the separate format include two categories for ethnicity:

Hispanic or Latino
Not Hispanic or Latino

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- The minimum standards for the separate format also include five categories for data on race (with instructions to select one or more, as appropriate):

American Indian or Alaska Native
Asian
Black or African American
Native Hawaiian or Other Pacific Islander
White

The Combined Format:

- When self-reporting is not practicable or feasible, a combined reporting format may be used for observer-collected data on race and ethnicity. In such cases, there will be six minimum racial/ethnic categories (with instructions to select one or more, as appropriate):

American Indian or Alaska Native
Asian
Black or African American
Hispanic or Latino
Native Hawaiian or Other Pacific Islander
White

Reporting

- Exact reporting formats, both for institutional reporting (e.g., the Integrated Postsecondary Education Data System, IPEDS), and for other federal reporting of data and analyses, are not yet developed. Active efforts are now underway to develop reporting standards and resolve the numerous issues involved. Nevertheless, the OMB standards do provide the following minimum reporting requirements, and suggestions beyond these minima, for each of the two data collection formats discussed above.

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- When data on race and ethnicity are collected separately, provision must be made to report the number of respondents in each of the five racial categories who also indicated ethnic background of Hispanic or Latino. When aggregate data are presented, data producers must provide, separately for each of the five racial categories, the number of respondents who indicated only one racial category. In addition, data producers are strongly encouraged to report detailed distributions, including all possible combinations, of multiple responses to the race question. If data on multiple responses are collapsed, at a minimum, the total number of respondents indicating more than one racial category must be provided.
- When data on race and ethnicity are collected separately, provision must be made to report the number of respondents in each of the five racial categories who also indicated ethnic background of Hispanic or Latino. When aggregate data are presented, data producers must provide, separately for each of the five racial categories, the number of respondents who indicated only one racial category. In addition, data producers are strongly encouraged to report detailed distributions, including all possible combinations, of multiple responses to the race question. If data on multiple responses are collapsed, at a minimum, the total number of respondents indicating more than one racial category must be provided.
- The terms "non-white" and "minority group(s)" are not to be used in data collection or reporting using the new standards.
- If the focus of a given study is on a particular group other than Whites, include Whites under an "All Other Races" designation.

Implications for Institutions

These new standards legally apply only to federal agencies in their data collection and reporting. Thus, for example, NCES is required to modify all IPEDS forms to collect data by racial and ethnic categories in full accordance with the new OMB standards. However, at this time, the exact content and format of new reporting forms is not yet determined. The primary IPEDS surveys affected by the new standards are Opening Fall Enrollment, Completions, the Graduation

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Rate Survey (GRS), and Fall Staff. There is no definitive information on exactly what may be required of institutions (e.g., using the Separate or Combined format in data collection, possible modifications to institutional database structure and content, and possible requirements in reporting data by race and ethnicity). Also, it should be noted that the new OMB standards apply to all federal data collection and reporting, not simply to IPEDS, including areas such as application and reporting for various federal grant programs, reporting various medical research results, and reporting for civil rights compliance.

While the new standards legally apply only to federal agencies, not adopting the new methodologies at the institutional level would lead to fundamental incompatibility not only between one's institutional data and all federal data (e.g., census data, IPEDS data), but to lack of comparability between institutions that have adopted the new standards and those that have not. Further, the result of not adopting the new standards would mean an inability to report institutional racial and ethnic data that more accurately reflect the U.S. population and would also forfeit an opportunity to provide prospective and current students, faculty, and alumni with options to capture for their racial and ethnic backgrounds more fully and accurately.

Adopting the new standards will result in not only new data, but also in a different structure for national and institutional databases. Currently, a single data field typically is used containing one of a limited set of valid values to signify the single racial/ethnic background of an individual. In the future, databases probably will have to contain multiple fields, one for each racial and ethnic category. Each field likely will contain a dichotomous variable indicating whether a given individual checked that category. However, some or all of the new data fields may contain multiple values such as might be required by institutions wishing to capture the exact tribal affiliation of persons identified as American Indian or Alaska Native. Such a structure will require considerable programming changes in campus-based systems, state-level systems, and other adaptations. New data collection forms will need to be developed for admissions, financial aid, various student record functions, alumni, and human resources. Thus, the new OMB standards are likely to require considerable investments of both time and money. Also, the new standards require very different analytic treatments of racial and ethnic data, as well as of all other data associated with racial and ethnic backgrounds.

The multiple response format of the new data also will give rise to a number of new conceptual constructs. Foremost is the potential for several different ways to determine the number of individuals included in a particular racial or ethnic category. For example, does the number of African-Americans include only those who checked this single racial category? Or does it include all those checking this category in combination with other categories? Should those who indicate Hispanic/Latino ethnicity be included in the counts for each racial category without separate identification as Hispanic? Or should they be included but reported separately as

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Hispanics/Latino, or excluded? Because of multi response reporting, the sum of individuals in each of the racial/ethnic categories will add to a total greater than the total number of individuals in the population. The exact meaning of statistics such as the number of White students on campus; the proportion of Asians on the faculty; the national production of Black Ph.D.'s; or, the graduation rate for Hispanic students will need much more interpretation than the current standards. It is clear that common questions will no longer have precise, unique, or commonly understood meanings absent the establishment of precise reporting conventions. There is an active effort supported by the National Science Foundation, the National Center for Education Statistics, and the National Postsecondary Education Cooperative to develop new IPEDS reporting methods and forms. This large, broad policy panel was constructed to contain representatives of all relevant stakeholders and relevant federal policy officials (see AIR Alert #3 for a summary of NPEC). This panel first met in March 1998. At present, the exact content and form of IPEDS reporting, the timing of shifts to new reporting format(s), issues related to using the "Separate Format" or "Combined Format" protocols, and how to provide a crosswalk between the existing data series and the new ones, among other operational issues, are yet to be resolved, although the panel has made some initial recommendations.

OMB mandates that federal agencies adopt the new standards no later than January 1, 2003. However, the panel recommended that some or all of the IPEDS reporting be done under the new methodologies one year prior to that date, in Fall 2002. It is unlikely that IPEDS will change prior to that date (and may change later). The GRS presents particular challenges for NCES and institutions since it tracks entering cohorts of students over a period of up to six years following initial enrollment and is based on Opening Fall Enrollment data. It is possible that GRS reporting will have to be increasingly phased into the new standards beginning two to four years after Opening Fall Enrollment reporting has begun to conform to them. Other reporting, both federal and non-federal, also will likely be phased in over several years.

Implications for AIR

AIR will be actively involved in efforts to shape the new contents and forms for all reporting that affects higher education (e.g., IPEDS, Equal Employment Opportunity Commission, federal grants, Office of Civil Rights compliance, as well reporting to non-federal entities such as college guides, the Common Data Set, and National Collegiate Athletic Association, and reporting received from non-federal entities such as those of standardized test results). This involvement likely will be coordinated primarily through AIR's Higher Education Data Policy Committee (HEDPC). AIR and HEDPC are well-represented on the NSF/NCES/NPEC policy panel currently dealing with new IPEDS reporting forms, timing of the change to the new standards, and crosswalks between the old data and the new.

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AIR also will keep its membership up to date on the evolution of both federal and institutional responses to the new OMB standards as these changes emerge through communications methods such as its "Alert" series, sessions at the AIR Forums, and other publications as appropriate. A session on this topic will be held at the 1998 AIR Forum (Session 27-132D, Tuesday, May 19, 3:15 p.m.).

Finally, AIR may wish to consider developing a set of guidelines once a number of currently unresolved issues become clear. These might include recommendations in areas such as use of the "Separate" and/or "Combined" data collection formats, wording and terminology, data storage conventions, certain aspects of IPEDS (and other) reporting, analytic treatment of the new racial and ethnic data, and methods for properly comparing old and new data series.

Timeline

June 1974--The Federal Interagency Committee on Education (FICE) created the Ad Hoc Committee on Racial and Ethnic Definitions to begin consideration of standards for racial/ethnic data.

Spring 1975--FICE completed its work on a draft set of categories and definitions. These were adopted on a one-year trial basis by a number of key federal agencies.

May 12, 1977--OMB adopted federal standards on racial/ethnic data.

1988--OMB, via the Federal Register, requested public comment on several proposed revisions to the 1977 standards, including the addition of a category of "Other." These revisions were strongly opposed, particularly by a number of Federal agencies.

1990--The decennial census found all-time high levels of ethnic diversity in the American population, and produced a great deal of criticism from many multiracial and particular ethnic populations who cannot be accurately classified under the existing standards.

1993--Congress held hearings concerning the issues of measuring race in the decennial census.

July 1993--OMB announced that it will undertake a multi-year, comprehensive review of the federal standards for racial and ethnic data, analysis, and reporting.

February 17-18, 1994--At the request of OMB, the Committee on National Statistics of the National Academy of Sciences held a workshop on issues surrounding review of the nation's standards for racial and ethnic data.

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March 1994--OMB established the Interagency Committee for the Review of Racial and Ethnic Standards. The Committee is advisory to OMB.

June 1994--OMB published a request for public comment on the then-current racial and ethnic standards. Public hearings on the subject were held in several cities during the summer.

1995 & 1996--Several major research projects were conducted concerning the primary issues identified, and various effects, of possible revisions to the standards for racial and ethnic data.

July 9, 1997--OMB published its first recommendations summarizing all research findings, as well as the Interagency Committee's set of recommendations to OMB as to revised federal standards for racial and ethnic data. The public comment period ran through September 8, 1997.

October 30, 1997--OMB published final Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity.

March 17-18, 1998--NCES, NSF, and NPEC cosponsored a Policy Panel on IPEDS Racial/Ethnic Classifications to begin consideration of the practical aspects of implementing the new OMB racial and ethnic standards.

Spring, 1998--The dress rehearsal for the year 2000 decennial census will be held.

May 19, 1998-- A panel presentation concerning the revised OMB standards and work to date concerning their implementation will be held as part of the 1998 Association for Institutional Research Annual Forum.

January 1, 2003--All current and new federal data collection and reporting must comply with the new OMB standards.

Additional Resources

- Recommendations from the Interagency Committee for the Review of the Racial and Ethnic Standards to the Office of Management and Budget Concerning Changes to the Standards for the Classification of Federal Data on Race and Ethnicity; Notice. The Federal Register (Vol. 62, No. 131, pp. 36873-36946), July 9, 1997.
<http://www.whitehouse.gov/WH/EOP/OMB/html/fedreg.html>. Hardcopy: no longer available.

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- Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity; Notice. The Federal Register (Vol. 62, No. 210, pp. 58781-58790), October 30, 1997. Web: <http://www.whitehouse.gov/WH/EOP/OMB/html/fedreg.html>. Hardcopy: no longer available.
- Evinger, S. (1995). How Shall we Measure Our Nation's Diversity? Chance, Vol. 8, No. 1. The American Statistical Association.
- Testing Methods of Collecting Racial and Ethnic Information: Results of the Current Population Survey Supplement on Race and Ethnicity. Web: <http://stats.bls.gov/news.release/ethnic.toc.htm>. Hardcopy: Bureau of Labor Statistics, 2 Massachusetts Ave., NE, Room 4915, Postal Square Building, Washington, D.C., 20212. Telephone: (202) 606-7375.
- Spotlight on Heterogeneity: The Federal Standards for Racial and Ethnic Classification. Committee on National Statistics of the National Academy of Sciences, 1994. CNTAT, 2101 Constitution Ave., NW, Washington, D.C., 20418.
- Federal Register Notice (59 FR 29831-29835), OMB background report on development of the standards for Directive-15 and request for public comment on their adequacy, principles to govern revisions, and specific suggestions for change. June 9, 1994. (See OMB web and hardcopy addresses, above.)
- Federal Register Notice (60 FR 44674-44693), OMB interim report on the review process, including summary of comments made on the Federal Register Notice of June 9, 1994 (above), and suggestions for research to be conducted related to revisions of the federal standards for racial and ethnic data. August 28, 1995. (See OMB web address)

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- Findings on Questions on Race and Hispanic Origin Tested in the 1996 National Content Survey. U.S. Bureau of the Census, December, 1996. Web: <http://www.census.gov/population/www/socdemo/96natcontentsurvey.html>. Hardcopy: U.S. Bureau of the Census, Population Division, Washington, D.C., 20233. Telephone: (301) 457-2402.
- Results of the 1996 Race and Ethnic Targeted Test. U.S. Bureau of the Census, May, 1997. Web: <http://www.census.gov/population/www/documentation/twps0018/>. Hardcopy: U.S. Bureau of the Census, Population Division, Washington, D.C., 20233. Telephone: (301) 457-2402.
- Racial and Ethnic Classifications Used by Public Schools. (NCES 96-092). National Center for Education Statistics, March , 1996. Web: <http://nces.ed.gov/pubs/96092.html>. Hardcopy: Department of Education, National Center for Education Statistics, 555 New Jersey Ave., NW, Washington, D.C., 20208-5574. Telephone: (202) 219-1442.

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