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The Honorable Shalanda D. Young
Director
Office of Management and Budget
725 17th Street N.W.
Washington D.C. 20503

I write to commend the Office of Management and Budget (OMB) for proposing to revise Statistical Policy Directive Number 15 (Directive 15) to collect data on the race and ethnicity of Middle Eastern and North African populations through a combined question on race and ethnicity.

The MENA community comprises a sizable population of the United States. However, the community has been ignored under current promulgated federal data collection standards. Adding MENA as a response category by federal agencies for the purposes of data collection will be key to ensuring the federal statistical system operates with “integrity, objectivity, impartiality, utility, and confidentiality” as directed by federal statute.

The design and implementation of Directive 15 is critical to ensuring that all community-based organizations as well as local and state governments can assess and address the needs of the diverse populations they serve. Directive 15 is also critical to the effective administration of all branches of the federal government, which utilize statistics on race and ethnicity to better enforce and implement civil rights legislation, identify disparities in program outcomes and resource distribution, and design programs to eliminate disparities, among other important activities.

Directive 15 currently aggregates data on MENA populations under the White racial response category. Federal agencies that administer programs targeted towards certain disadvantaged minorities or that data across racial and ethnic categories have consequently had no direct way to count members of this group in official statistics. The result has been an ignorance of the MENA population and its characteristics from the Federal government, which in turn has had a reverberating impact on state, city, and local governments across the country.

State, city, and local governments rely on federal data collection and analysis to make policy decisions for many vital programs and services. For example, state, city, and local governments use data from the Bureau of Economic Analysis and the Federal Reserve Board to develop their budget forecasts and predict the economic conditions of their localities. Different demographics present different financial and economic characteristics. Disaggregating MENA communities from the White racial category will help better develop programs to address the specific economic needs of the MENA community. Most federal funds to state, city, and local governments are also distributed according to data collected and compiled by the Census Bureau—which in 2015 dictated the allocation of approximately \$675 billion across 132

programs to local and state governments. MENA exclusion from the federal data disrupts the accurate and effective allocation of resources to MENA communities across the United States.

Recognizing MENA as a standalone racial and ethnic category would also promote and protect civil and voting rights. The Civil Rights Act of 1964 addressed discrimination based on race, color, religion, national origin, or sex. However, because MENA is considered part of the White racial category, MENA communities are not protected under the law's protections for race, ethnicity, and national origin. Separating MENA into its own racial and ethnic category would also support enforcing the Voting Rights Act of 1965 by drawing congressional and state legislative district boundaries mindful of MENA populations. This will likely have a significant and positive impact on the civic engagement of MENA populations across local, state, and federal governments.

Recognizing MENA as a standalone racial and ethnic category would allow state, city, and local governments to better monitor and fight discrimination in housing, mortgage lending, and credit. Decades of discriminatory housing policies by federal, state, city, and local governments have led to segregated neighborhoods across the country. Legislation such as the Fair Housing Act, was signed into law to prohibit discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. However, like the Civil and Voting Rights Acts, MENA communities cannot bring a claim for discrimination and state, city, and local governments cannot bring a case against a housing provider for discrimination based on bias against individuals who identify with a MENA nationality or ethnic group.

Approximately 30 percent of the world's data volume is generated by the healthcare sector and is expected to only grow as a share of the world's data volume. Across multiple agencies and more than a dozen surveys the federal government collects and analyzes healthcare data and trends across the United States, making it the largest aggregator and publisher of healthcare information in the country. This information is used by state, city, and local governments to target healthcare to residents and set policy, especially for federal-state programs such as Medicare, Medicaid, and public employee benefit programs. The MENA demographic suffers from a severe lack of information on its healthcare characteristics and trends. This was made apparent during the COVID-19 pandemic. An estimated 17 percent of Arab Americans tested positive for COVID-19 compared to 7.5 percent of non-Hispanic Whites in Michigan. Demonstrating a disproportionate rate of COVID-19. However, because federal agencies do not collect data about MENA communities, the full impact of the COVID-19 pandemic and other chronic diseases is not fully known.

There are an estimated 5 million Americans of MENA descent across the United States. Yet, little information has been collected about the demographic makeup of the community by the Federal government. As a result, the MENA community has suffered in the areas of employment, housing, healthcare, civil and voting rights, and much more. Disaggregating MENA from the White racial response category will go a long way toward addressing many of the challenges that

MENA communities face. This will supply state, city, and local governments with valuable information and legal tools to understand and address the needs of the community.

Sincerely,
