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## Classifying racial and ethnic group data in the United States: the politics of negotiation and accommodation

Alice Robbin\*

*School of Information Studies, Florida State University, 240 Louis Shores Building, Tallahassee, FL  
32306-2100, USA*

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### Abstract

“Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity,” formerly known as “Statistical Policy Directive 15,” is a classification system that has formed the basis of the U.S. government’s collection and presentation of data on race and ethnicity since 1977. During the mid-1990s, it underwent a public evaluation to determine whether the racial and ethnic group categories should be revised. This article examines the history of Statistical Policy Directive 15 from its origins through October 1997 and evaluates its consequences on political, economic, and social life. Among the many lessons that government information specialists can take away from the history of Statistical Policy Directive 15 is that classification systems are not neutral tools that objectively reflect and measure the empirical world. Classification systems cannot be isolated from the larger political setting. They are tightly linked to public policies, and, in the case of racial and ethnic group classification, they constitute highly contested social policy about which there is little public consensus. © 2000 Elsevier Science Ltd. All rights reserved.

*Keywords:* Federal statistics; Decennial census; Race and ethnicity; Minority groups; Multiracial identity

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Alice Robbin is assistant professor in the School of Information Studies at Florida State University, where she teaches courses in government information, information policy, research methods, and societal implications of the information age. Her work is at the intersection of public policy, information, and communication, and focuses on the U.S. federal statistical system and the development of information infrastructure. Her article on the conceptual basis of race and ethnicity appeared in an earlier issue of this journal.

\* Tel.: 850-645-5676.

*E-mail address:* arobbin@mailier.fsu.edu (A. Robbin).

## 1. Introduction

The U.S. Office of Management and Budget (OMB) policy on “Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity” governs the U.S. government’s collection and presentation of data on race and ethnicity. Promulgated in 1977, the standard became widely known as “Statistical Policy Directive 15”<sup>1</sup>. The requirement that executive agencies collect racial and ethnic group information became institutionalized in nearly every one of the 50 titles of the *U.S. Code* and associated administrative regulations. State and local governments, intergovernmental and non-profit organizations, and firms in the private sector became subject to the standards for classification when these data were collected.

The Directive underwent an extensive public and governmental review between 1993 and 1997. During this period the problematic status of the classification system for racial and ethnic group categories was made explicit. It became the subject of widespread national media attention, interest group lobbying, and congressional attention because of the Directive’s structural relationship to the decennial census and a very large array of public law. In October 1997, OMB issued a *Federal Register* Notice that revised the system for classifying the racial and ethnic group categories<sup>2</sup>. By the time that OMB issued a draft report on alternatives for collecting and tabulating race and ethnic data under the new standards, in February 1999, Statistical Policy Directive 15 had been the subject of political controversy for nearly 25 years<sup>3</sup>.

This article examines the history of the Directive from the design of the standard between 1973 and 1975 through the public review between 1993 and 1997. This continues an earlier discussion about the problematic nature of the federal classification system for racial and ethnic origin data<sup>4</sup>. The article extends understanding of classification systems as products of conflict, negotiation, compromise, and accommodation. The article also notes how the Directive permeated the institutional infrastructure of the nation, with consequences for social, political, and economic life.

Nearly all the history recounted here is derived from public documents; information about the internal government agency disputes and discussions is unavailable at this time. Groups that lobbied for or against changes to the Directive did, however, publicize their positions in the national media, and the government made available transcripts of hearings and public comment. Tables 1 and 2 summarize the evolution of Statistical Policy Directive 15 between 1977 and 1997, and Table 3 synthesizes the issue positions of the public and government agencies.

## 2. Origins and implementation of Statistical Policy Directive 15, 1973–1980

“Great Society” public policy initiatives and the political mobilization of minority population groups during the 1960s and the early 1970s, radically altered the political, economic, and social landscape and greatly enlarged government’s role in ensuring the health and welfare of its citizens. Along with government’s increased responsibility came significant enhancements to administrative record-keeping systems to support data collection and reporting. Collecting governmental statistics on racial and ethnic groups was, however, a haphazard administrative activity until public laws mandated a standardized data collection for “protected classes,” specific population groups deemed to have suffered discrimination and differential treatment based on race or ethnic origin<sup>5</sup>.

Table 1

Evolution of statistical directive 15, 1977–1997: Race and Hispanic origin items (minimum designation)<sup>a</sup>

1977 Standard Adopted <sup>b</sup>		July 1997 Interagency Committee Proposal <sup>c</sup>		October 1997 Revision Adopted by OMB <sup>c</sup>	
Category name	Definition	Category name	Definition	Category name	Definition
<b>Race</b>					
American Indian or Alaskan Native	A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal affiliation or community recognition	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who <b>maintain tribal affiliation or community attachment.</b>
Asian or Pacific Islander	A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands, and Samoa	No change	A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands, <b>Hawaii</b> , and Samoa	<b>Asian</b>	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including for example, <b>Cambodia</b> , China, India, Japan, Korea, <b>Malaysia</b> , <b>Pakistan</b> , the Philippine Islands, <b>Thailand</b> , and <b>Vietnam</b>
Black	A person having origins in any of the black racial groups of Africa	<b>Black or African-American</b>	No change	Black or African American [Note: “-” removed]	A person having origins in any of the black racial groups of Africa. <b>Terms such as “Haitian” or “Negro” can be used in addition to “Black or African American.”</b>
White	A person having origins in any of the original peoples of Europe, North Africa, or the Middle East	No change	No change	<b>Native American or Other Pacific Islander</b> White	<b>A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands</b> A person having origins in any of the original peoples of Europe, <b>the Middle East, or North Africa</b>

(continued)

Table 1 (Continued)

1977 Standard Adopted <sup>b</sup>		July 1997 Interagency Committee Proposal <sup>c</sup>		October 1997 Revision Adopted by OMB <sup>c</sup>	
Category name	Definition	Category name	Definition	Category name	Definition
Hispanic	A person of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.	No change	No change	Hispanic or Latino	A person of <b>Cuban, Mexican, Puerto Rican</b> , South or Central American, or other Spanish culture or origin, regardless of race. <b>The term, “Spanish origin” can be used in addition to “Hispanic or Latino.”</b>

<sup>a</sup> Bold type indicates wording change.

<sup>b</sup> Mark (check) one category.

<sup>c</sup> Select one or more categories.

Table 2

Evolution of Statistical Directive 15, 1977–1997: Race and Hispanic origin combined format (Minimum Categories)<sup>a</sup>

1977 Standard Adopted <sup>b</sup>	July 1977 Interagency Committee Proposal <sup>c</sup>	October 1997 Revision Adopted by OMB <sup>c</sup>
American Indian or Alaskan Native	American Indian or <b>Alaska</b> Native	American Indian or Alaska Native
Asian or Pacific Islander	Asian or Pacific Islander	<b>Asian</b>
Black, not of Hispanic origin	Black, not of Hispanic origin	<b>Black or African American</b>
Hispanic	Hispanic	Hispanic or <b>Latino</b> <b>Native Hawaiian or Other Pacific Islander</b>
White, not of Hispanic origin	White, not of Hispanic origin	<b>White</b>

<sup>a</sup> Bold type indicates wording change.

<sup>b</sup> Mark (check) one category.

<sup>c</sup> Select one or more categories

The Directive has its origins in an April 1973 Federal Interagency Committee on Education (FICE) Subcommittee on Minority Education report, *Higher Education for Chicanos, Puerto Ricans, and American Indians*. The report “deplored the lack of useful data on racial and ethnic groups” and recommended that the federal government develop common definitions and that federal agencies collect these data “on a compatible and nonduplicative basis”<sup>6</sup>. The FICE Ad Hoc Committee on Racial and Ethnic Definitions was officially created in June 1974, and submitted its report in April 1975. The report recommended that four racial categories (American Indian or Alaskan Native, Asian or Pacific Islander, Black/Negro, and Caucasian/White) and one ethnic category (Hispanic) be created.

The recommendations were not, however, arrived at by consensus. There was, according to the Report, “considerable discussion, disagreement, give-and-take, and compromise,” and a minority report was filed for every category<sup>7</sup>. The report noted that developing the categories had presented “major problems” for the Ad Hoc Committee. The Committee had to resolve definitional and naming problems for each racial and ethnic category and had to solve the methodological problem of how the information would be obtained. One problem the Committee faced was which nationality to include in a category, because the categories were, by and large, formulated to identify persons by geographic location. Assigning names to the particular category was also subject to debate. A third problem was that membership in a category could not be determined independent of specific federal laws and agency mandates for providing services to identified protected classes. The methodological issue of data collection by self-identification or observation by a third party was the fourth problem area, and was never resolved.

After an initial testing and implementation phase of approximately one year, OMB issued Revised Exhibit F to OMB Circular No. A-46, which became known as “Statistical Policy Directive 15.” The Directive established the legitimacy of a classification system for official statistics on race and ethnic origin, and OMB as the authority for the standard. The standard became effective in 1977 for all new and revised record-keeping systems. Many agencies could not immediately comply, because forms management and data processing modifications were necessary, and were permitted to delay implementation until January 1, 1980.

The Directive mandated *minimum* data collection for race and ethnic origin for civil rights compliance monitoring, general program administrative and grant reporting requirements that included racial or ethnic data, and statistical reporting for “federal sponsored statistical data collection where race and/or ethnicity is required.” The Directive cautioned, however, that the standard was not to be used to determine eligibility for participating in any federal program, nor were the categories to be construed as representing biological or genetic racial origins.

Four racial categories (American Indian or Alaskan Native, Asian or Pacific Islander, Black/Negro, and White) and one ethnic origin category (Hispanic) were created, along with rules for nomenclature and membership in the categories. The ethnic category of “Hispanic origin, Not of Hispanic origin” was included to comply with Public Law 94-311 of June 16, 1976 (90 Stat. 688), which required the collection, analysis, and publication of statistics for Americans of Spanish origin or descent<sup>8</sup>. See Table 1 for the category names and definitions that were adopted for the minimum standard and Table 2 for the minimum standard adopted for the combined items of race and Hispanic origin.

People of biracial or multiracial heritage were required to select one category that “most closely reflect[ed] the individual’s recognition in his community”<sup>9</sup>. The Directive recommended, but did not require, that self-identification be the preferred manner of data collection, although it had been standard operating practice for agencies to assign racial and ethnic group identity by observer rather than by respondent self-identification<sup>10</sup>. This recommendation for self-identification established, for the first time in the history of governmental record keeping, the individual respondent as the authoritative source for personal racial identity.

The Directive was designed to create flexibility, but at the same time to limit greatly agency discretion for changes that might be made and to ensure control over information collection and presentation and comparability throughout the federal government. The language of the Directive emphasized a “flexible framework” that was designed to permit “historical continuity and compatibility.” A “flexible framework” implied that the number of categories could be enlarged. “Historical continuity and compatibility” implied the creation of an institutional infrastructure that would transform the organization of work, create an institutional memory and analytical capability, and improve coordination among federal government agencies.

The standard was “permissive” in two senses regarding the expansion of categories and subcategories. First, OMB could approve a variance for the addition of a category, if an agency could make a good case. Second, agencies were encouraged to collect subgroup ethnic data to meet their missions. In so doing, agencies were required to aggregate or summarize the additional categories into the five basic categories for reporting purposes to create comparability of data presentation across agencies (e.g., Chinese, Korean, Japanese combined into “Asian and Pacific Islander” or Mexican, Cuban, Puerto Rican into “Hispanic”)<sup>11</sup>.

The Directive also specified how data should be reported, which included use of the minimum categories, as well as collective descriptions when appropriate (e.g., “White,” “Black,” and “All Other Races” as distinctions for majority and minority races or “White” and “All Other Races”). It was no longer permissible to use the descriptor “Nonwhite,” or to aggregate data into an “All other” except when reports focused on only one or two racial groups. Finally, the Directive cautioned that the standard was not to be used for determining eligibility or participation in social welfare programs.

The Office of Federal Statistical Policy and Standards (OFSPS) went to considerable lengths to

respond to agencies' "concerns" in the year following the testing and implementation of the standard. It is evident from a lengthy response and clarification issued by OFSPS, however, that there was opposition to the Directive<sup>12</sup>. Data collection by respondent self-identification appears to have been opposed strongly by various but unidentified agencies<sup>13</sup>. OFSPS's response was to encourage agencies to collect data by self-identification but also to justify data collection through observer status<sup>14</sup>. A solution offered by OFSPS was the use of an "Other" category for respondents who did not believe that the five categories adequately described their heritage<sup>15</sup>. Nonetheless, the solutions did not resolve the problem of respondent self-identification and observer-defined racial and ethnic group membership, and agency record keeping would continue to reflect a mix of these two forms of information collection over the next two decades.

In promulgating the standard, OMB was not immune to external political pressure. Between the time that the Ad Hoc Committee Report recommended that East Asians be included in the "White" category and the publication of the standard by OMB, East Asians successfully lobbied to be classified as members of the "Asian and Pacific Islander" category. The politicizing of the administrative process to develop the classification system for race and ethnicity would intensify in the next decade as the implications and consequences of the Directive became evident to a wide array of stakeholders.

### **3. Impetus for revision of the standard, 1988–1993**

Throughout the 1980s, government statisticians, demographers, and social scientists reported frequently at professional meetings about problems with the quality of racial and ethnic group statistics. Government agencies acknowledged that the statistics had to be used with caution. The statistics were not uniformly collected or reported across or within federal agencies, particularly, for agencies that depended on data collection by organizations or administrative units outside the federal government. Problems with category membership, definitions, and naming conventions, which had first been identified by the FICE Ad Hoc Committee, resurfaced.

Statisticians and survey methodologists' research conducted inside and outside the federal government revealed a variety of conceptual problems with the categories. The federal agencies identified imprecise definitions, category names that did not correspond to how people defined themselves, and categories that were neither exhaustive nor mutually exclusive<sup>16</sup>. These problems yielded inconsistencies in responses, as well as increasing non-response for the race and ethnic origin items<sup>17</sup>.

Government demographic research as well as the work of academic demographers also revealed that large-scale changes were occurring in the population. Changes in immigration policies between the 1960s and 1980s had significantly altered the racial and ethnic composition of the nation. Large-scale immigration increased the populations originating in Latin America and Asia and also contributed significantly to the growth and changes in the composition of interracial marriages. The demographic changes associated with immigration and interracial marriage implied not only an increasingly diverse society, but also a much higher proportion of the population of mixed race or ethnicity. Coupled with the known fluidity of racial and ethnic identity, movement in and out of social groups, the historical complexity of



American ancestries, and the conceptual problems with the categories, there was, as the federal agencies acknowledged, a “growing measurement error” with racial and ethnic statistics.

The accumulated evidence led OMB to issue a draft Statistical Policy Circular in the *Federal Register* in 1988 that solicited public comment on a comprehensive review of Statistical Policy Directive 15<sup>18</sup>. The draft Circular proposed the addition of a residual “Other” racial category and a required classification by self-identification. The proposal was both supported and opposed by multiethnic and multiracial groups<sup>19</sup>. Multiracial groups that supported changes argued that the categories had significant meaning for individuals, but that identification of mixed racial parentage was not acknowledged by the Directive and, as such, denied people their racial heritage. Minority population organizations that supported changes, principally Asian and Pacific Islander groups, argued that the demographic composition of the U.S. population had changed and needed to be characterized more accurately; if ethnic populations were not fully identified, this raised the issue of inequitable treatment.

Opposition was, however, vigorous on the part of the U.S. Senate, many federal agencies, and large corporations<sup>20</sup>. Minority groups that opposed change, especially the addition of a residual “Other” category, argued that the changes were potentially divisive, the current system provided adequate data, historical continuity of the data would be disrupted, and changes would be expensive to implement. Some of the minority groups opposed modifying the Directive because they “interpreted the proposal as an attempt to provoke internal dissension within their communities and to reduce the official counts of minority populations”<sup>21</sup>. Federal agencies mandated to monitor compliance with civil rights and affirmative action opposed any changes<sup>22</sup>. The Senate opposed self-identification because it could “severely damage the accuracy and consistency of data used by several agencies to eliminate discrimination and would seriously jeopardize the current employment and education-related uniform recordkeeping and reporting requirements under federal agency programs”<sup>23</sup>. The Senate took OMB to task for not having consulted with civil rights agencies prior to publication of the Notice. OMB had, in the words of the administrator of OMB’s Office of Information and Regulatory Affairs, “walked into a firestorm,” and OMB was forced to withdraw the proposal<sup>24</sup>.

Nevertheless, dissatisfaction with Statistical Policy Directive 15 grew. As a result, the Directive became the target of increased public and congressional scrutiny and calls for changes by various interest groups, as attention focused on the Year 2000 decennial census, following what was more than a decade of controversy over the 1980 and 1990 censuses related to race and ethnicity questions<sup>25</sup>. The Directive had become thoroughly implicated in a historical and increasingly strident debate about the census as an accurate representation of the demographic composition of the United States and its role in legislative apportionment and redistricting and the distribution of federal government revenues to states and municipalities. By the early 1990s, grassroots organizations had also formed to lobby local school districts and state legislatures for the addition of a “Multiracial” category on administrative forms, and began mobilizing to influence congressional representatives. The multiracial and multiethnic organizations were successful in getting the attention of Congress, in particular the attention of Representative Thomas Sawyer (D-OH), whose constituents had mobilized widespread support for changes in administrative and school district forms<sup>26</sup>.

During the first session of the 103rd Congress, in 1993, the House Subcommittee on Census, Statistics and Postal Personnel, chaired by Representative Sawyer, held four hearings to review the sta-

tus of the racial and ethnic group categories, although the hearings were “scarcely reported and sparsely attended,” reporter Lawrence Wright wrote<sup>27</sup>. In the mind of many people inside government, however, these hearings were a watershed in the nearly 20 years of debates over the Directive, and congressional attention legitimated an OMB-initiated, formal government-wide assessment.

The four hearings heard arguments from witnesses from government agencies, universities and other private sector research organizations, Congress, and well-established racial and ethnic population interest groups. Hispanics, represented by the National Council of La Raza and the Mexican American Legal Defense and Educational Fund, opposed changes in the Directive, while at the same time, noting that the racial and ethnic group statistics suffered from data quality problems<sup>28</sup>. African Americans, represented by the National Urban League, and American Indians, represented by the National Congress of American Indians, strongly opposed any modification of the Directive because they feared that civil rights and other protections guaranteed by federal laws would be lost.

Organizations that supported enlarging the categories to reflect their particular ethnic or racial groups included Arab Americans, represented by the Arab American Institute, and Asian-Pacific Islanders, represented by the National Coalition for an Accurate Count of Asians and Pacific Islanders. Testimony was also heard from Project RACE and the Association of Multiethnic Americans (AMEA), grassroots organizations that lobbied for the addition of a “multiracial” category<sup>29</sup>. Written statements were received from two “white ethnic” cultural organizations, including Italian Americans. Senator Daniel Akaka (D-HI) and Representative Norman Mineta (D-CA) urged that Native Hawaiians be reclassified to the American Indian and Alaskan Native category; and Representative Barney Frank (D-MA) testified on behalf of constituents who wanted to add a “Cape Verdean” category. Federal agencies opposed changes in the Directive, emphasized the need to preserve the continuity of the data, and argued that the Directive was essential for enforcing public policy, particularly civil rights monitoring and compliance.

During the congressional hearings, OMB promised the subcommittee that it would proceed with a planned review of the Directive, and, in fact, had already taken steps to initiate such an assessment process<sup>30</sup>. The Committee on National Statistics (CNStat) of the National Research Council (NRC) was asked to organize a workshop that would be held in February 1994, to “stimulate informed discussion by a wide variety of data users on the current standards”<sup>31</sup>. OMB informed Congress that it would also create an Interagency Committee for the Review of the Racial and Ethnic Standards, and did so in March 1994. Ultimately, the Interagency Committee would “represent more than 30 agencies with many and diverse federal requirements for data on race and ethnicity”<sup>32</sup>.

#### **4. *Federal Register* Notice, June 1994**

The third step taken by OMB was to issue a *Federal Register* Notice in June 1994, which linked the review process to planning decisions related to the Year 2000 census and established an agenda for the review process. The review would determine “the adequacy of the current categories, principles that should govern any proposed revisions to the standards, and specific suggestions for changes”<sup>33</sup>. The Notice identified criticisms of the standard and invited the public to express its “satisfaction or dissatisfaction” and make “suggestions and crit-

icisms” regarding the current categories. OMB “cautioned that the Directive served important administrative purposes,” including the collection of comparable data by federal agencies, although it acknowledged that “most people associated the racial and ethnic categories with the decennial census.” This Notice, particularly in its wording regarding the explicit linkage of the Directive to the Year 2000 Census, structured the subsequent interpretation of the Directive by and mobilization of the lay public, media, Congress, and interest groups<sup>34</sup>. OMB requested public comment and also announced that three public hearings were to be held in Boston, Denver, and San Francisco in July 1994<sup>35</sup>.

In July 1994, the OMB staff traveled to Boston, Denver, San Francisco, and Honolulu for hearings at which 94 witnesses testified<sup>36</sup>. Witnesses included representatives of the same minority interest groups that had testified at the 1993 congressional hearings; federal and state legislators; national, regional, and community minority population interest groups; and scores of advocacy, civic, fraternal, ethnic, multiracial, and multicultural organizations<sup>37</sup>. It is likely that so many local groups were able to testify because the hearings took place in a geographic location relatively close to them. The private sector, particularly business interests, was not visible during these hearings, except through Chambers of Commerce whose representatives played an advocacy role on behalf of Native Hawaiians, Samoans, and Arab Americans. Indeed, in contrast to its usual participation in the development of administrative rules and regulations, the business community was notable by its absence at these hearings; only one business community representative testified on behalf of his organization, requesting that no changes be made in the standard.

With only a few exceptions, witnesses supported the Directive and requested that the categories be expanded to identify their ethnic or racial group, including “white ethnics” who believed that they were disenfranchised by the current classification system. Although the delivery, tone, and language of the testimony given at these OMB hearings indicate that nearly all witnesses were new entrants to the political process, the arguments they presented were similar to those made by interest groups during the 1993 congressional hearings. Hispanic-Latino organizations, American Indian tribes, and the National Association for the Advancement of Colored People continued to oppose any modification to the Directive’s criteria for classifying racial or ethnic groups. Other witnesses supported the Directive, but opposed the existing typology for racial classification and requested either a more refined scheme to reflect the differences within racial or ethnic subgroups (e.g., Cape Verdean, Cajun, German-American, Spanish-American); reclassification of an existing ethnic group (e.g., “Native Hawaiian” and “Samoan” into the “American Indian” category); or a new category (e.g., “Multiracial”).

The addition of a “multiracial” category was supported by Parent-Teacher Organizations at the state and national levels and state legislators from Massachusetts, Colorado, and California. Organizations representing Asian and Pacific Islanders were effectively mobilized. Numerous Hawaiian and Samoan organizations on the mainland and in Hawaii supported Senator Akaka’s position to reclassify Hawaiians as “Native Hawaiians” and “Samoans” who were “original peoples” from the Asian and Pacific Islander category to the American Indian and Native Alaskan category. In solidarity with Native Hawaiian and Samoan groups, witnesses representing various Asian organizations also supported reclassifying Native Hawaiians and Samoans<sup>38</sup>. Representatives from the governor’s office and state government, education, human services advocacy and civic organizations, Chambers of Commerce, and

political organizations, which included Native Hawaiian peoples' councils, dominated the two-day Honolulu hearings.

Following the June 1994 *Federal Register* Notice, the OMB received extensive public comment, consisting of 763 letters and their attachments, more than 5,400 pages of handwritten and typed documentation, each of which varied in length from one to hundreds of pages and often included supporting statistical data<sup>39</sup>. The public comment offered citizens a “private” opportunity to oppose the Directive, something that had not taken place in the public setting of either congressional or OMB hearings. It was in this setting that OMB heard strong opposition to the Directive for the rights that the government ostensibly provided to some special-interest minority populations but which excluded others<sup>40</sup>.

Conforming to the format and categories identified in the *Federal Register* Notice, the majority of the letters directed their comments to a specific racial or ethnic group category and naming conventions (e.g., Hispanic, Black, Multiracial, European-American, American Indian, Native Hawaiian, Asian Pacific Islander, Middle Eastern, etc.) and identified a policy preference (supported or opposed the Directive, supported or opposed a category name change). Thirteen different racial or ethnic categories were identified.

The majority of the letters were written by individuals who represented themselves, but their affiliation with or knowledge of a voluntary organization's position on the Directive was either explicitly identified or obvious from the content of the letter. For-profit business sector firms did not submit letters. Only one letter was received from a national African American interest group, and only a few letters commented on the “Hispanic” category.

Only one nationally organized minority population interest group, Native American tribal council leaders, was heavily represented in terms of the number of letters received by OMB. Appeals also identified specific congressional supporters to whom their letters were copied. Native American tribal council leaders organized a national letter-writing campaign that mobilized Native American people's councils and their congressional supporters to oppose any changes to the Directive, particularly, the inclusion of Native Hawaiians in the “American Indian and Alaska Native” category and the change from “American” to “Native” Indian.

Grassroots organizations that supported the addition of a multiracial category initiated national letter-writing campaigns across the country, and their letters and petitions constituted more than half the public comment that OMB received<sup>41</sup>. White ethnic groups, nearly all of European ancestry, which had not been a visible public presence earlier in the official record, mobilized cultural and ethnic organizations and circulated petitions for the addition of a European-American category; like the other groups that supported the Directive, they too argued entitlement, disenfranchisement, and representation, but for affected white Europeans<sup>42</sup>. Arab American college students organized a letter writing campaign to lobby for the addition of an Arab or “Middle Easternor” [sic] category, arguing that Arab Americans faced discrimination and needed protections afforded other minorities.

## **5. Role of the Interagency Committee's Research Working Group**

The Interagency Committee's Research Working Group, co-chaired by the Bureau of the Census and Bureau of Labor Statistics, was tasked with reviewing research and developing a

research agenda for the assessment<sup>43</sup>. Federal statistical agencies embarked on research to “test key concerns” with members of the social science, health research, and public policy communities<sup>44</sup>.

The Interagency Committee’s research agenda was operationalized through the multi-year program of testing and evaluation for Census 2000, inclusion of race and ethnicity questions in other surveys conducted by the U.S. Bureau of the Census, a supplement to the May 1995 Current Population Survey designed jointly by the U.S. Bureau of Labor Statistics and U.S. Bureau of the Census, a special survey of public schools conducted under the auspices of the U.S. National Center for Education and Office of Civil Rights of the Department of Education, and research conducted by other federal agencies, including the Centers for Disease Control and various units within the U.S. Department of Health and Human Services. Results of surveys conducted by mail, personal and telephone interviews were compared. The Race and Ethnicity Targeted Test (RAETT) survey conducted by the U.S. Bureau of the Census became the principal vehicle for testing and evaluating alternative question formats and wording. These alternative formats included a multiracial category, the addition of the Hispanic category to the race item, and preferences for racial and ethnic terms (names such as “Afro-American,” “African American,” “Black,” “Negro,” “Latino,” and “Hispanic”).

It will probably never be possible to calculate the amount of money expended on this research program because activities were diffused throughout the federal agencies and federal employees also worked on the research program as part of their regular jobs. One newspaper account, however, cited officials who estimated that \$5 million had probably been spent as of September 1997<sup>45</sup>. This figure seems rather low because it most likely does not account for time spent by federal employees.

Although the Interagency Committee’s deliberations were not public, research-in-progress was regularly presented at numerous professional association meetings and subsequently published in working papers and reports by the federal agencies<sup>46</sup>. Testimony about research findings by social scientists and demographers was introduced into *Federal Register* Notices published in 1995 and 1997, and discussed at congressional hearings held in 1997. This research became the justification for decisions regarding the revision of the Directive.

## **6. Interim progress report, 1995**

OMB issued a 20-page *Federal Register* Notice in August 1995, which summarized the results of the OMB hearings, public comment, and agenda of research activities that had taken place during the previous year and a half<sup>47</sup>. This Notice served as an interim report of the government review process and reflected a painstaking governmental effort to organize testimony and written statements, the extensive public comment received by OMB, concerns registered by administrative agencies, and research of the social science community and governmental programs. Perhaps most useful for individuals excluded from the government’s internal review deliberations was that this Notice was the first organized official articulation outside congressional hearings of support and opposition to the Directive by federal agencies and other administrative units involved in implementing the Directive. The Notice did not explicitly distinguish among comments received from the public, federal agencies, or social science community. However, the language of justification—as dry and bureaucratic as an official document is—made clear the preferences of the

governmental agencies, their responsibility for implementing law and public policy, and the different perspectives of government agencies and the public. See Table 3 for a summary of three of the issue areas and government and public positions that were identified in the “Interim Notice of Standards for the Classification of Federal Data on Race and Ethnicity.”

The format of this Notice is instructive for how the government had organized its deliberations and how it would subsequently present its case for modifying the Directive. The Notice recapitulated the origins and history of the Directive and reemphasized that race was not a biological or genetic concept. The Notice also reiterated a set of principles that guided the review, including the need to be sensitive to the aspirations and cultural identity of individuals, and alluded to the value-laden and contentious nature of racial and ethnic group classification. The arguments in this Interim Report were organized in six issue areas in the form of questions: Should the status quo be maintained, should changes be made to the Directive, should there be separate or combined race and Hispanic origin identifiers, should data collection take place by observer or self-identification, should different criteria be used for categories, and should categories be revised? The text contained arguments for supporting and opposing change, which can be organized in a typology that includes the political and legal environ-

Table 3

Summary of issue areas and government and public positions identified in the “Interim Notice of Standards for the Classification of Federal Data on Race and Ethnicity”

Issue 1. Should Statistical Policy Directive 15 be maintained (status quo)?								
	Maintain the status quo				Oppose the status quo			
	Political/ legal	Administrative	Scientific/ technical	Financial/ economic	Political/ legal	Administrative	Scientific/ technical	Financial/ economic
Public	X				X		X	
Government agencies	X	X	X	X				
Issue 2. Should revisions be made to the directive?								
	No revisions				Make changes			
	Political/ legal	Administrative	Scientific/ technical	Financial/ economic	Political/ legal	Administrative	Scientific/ technical	Financial/ economic
Public			X		X		X	
Government agencies	X	X	X	X			X	
Issue 3. Should the perception of the observer be maintained for data collection?								
	Maintain observer status				Require self-identification			
	Political/ legal	Administrative	Scientific/ technical	Financial/ economic	Political/ legal	Administrative	Scientific/ technical	Financial/ economic
Public							X	
Government agencies	X	X	X	X				

Source: Executive Office of the President, Office of Management and Budget, “Interim Notice of Review and Possible Revision of OMB’s Statistical Policy Directive for the Classification of Federal Data on Race and Ethnicity,” *Federal Register*.

ment, program and policy administration, scientific and technical issues, and financial and economic reasons.

Government agencies positioned themselves against changes to the Directive, including classification and data collection through observer or self-identification. They cited statutory and administrative responsibilities for not making changes, although some of the agencies also recognized that there were good scientific reasons for making changes, principally, to better represent demographic changes that had taken place in the population. To the extent that public support was articulated for not altering the Directive, it was made on grounds that minority groups needed protections that the Directive provided. Overwhelmingly, however, the Interim Report shows a public that urged revisions principally on scientific and technical grounds—new population groups should be represented in the classification of race and ethnicity and higher quality data should be obtained during the data collection process. Moreover, there was a realization that a political environment required expansion of protections for excluded minority populations.

## **7. Congressional hearings, April–May 1997**

The years between 1994 and 1997 were marked by a significant increase in the political activism of national, state, and local organizations opposed to changes and those lobbying for the addition of a multiracial category. In 1995, for example, to oppose changes in the Directive, African American organizations created a “Coalition of Groups Opposed to the Proposed Modification of OMB Directive No. 15,” composed of the National Association for the Advancement of Colored People, National Urban League, Lawyer’s Committee for Civil Rights Under Law, and Joint Center for Political and Economic Studies<sup>48</sup>. In 1996, the Arab American Institute (AAI) altered its strategy of lobbying to add an “Arab” or “Middle Eastern” category, in part, because there were divergent views within the Arab-American community about supporting an Arab or Middle Eastern category<sup>49</sup>. Learning that the “ancestry” item might not be included in the 2000 census, AAI turned its attention to protecting this item and founded the Working Group on Ancestry in the U.S. Census, a national coalition of ethnic organizations and scholars.

Multiracial organizations, through successful grassroots efforts and sustained activism, generated the widest and perhaps most successful publicity during this period. In 1995, legislation was introduced in 11 states to require the addition of a multiracial category to its administrative or educational forms. Multiracial “Solidarity Marches” were held in Washington in late July and early August 1996<sup>50</sup>. By the end of 1996, Ohio, Illinois, Georgia, Indiana, and Michigan had enacted laws<sup>51</sup>. At the federal level, on February 25, 1997, Representative Thomas E. Petri (R-WI) introduced H.R. 830 to amend Chapter 35 of Title 44 of the *U.S. Code* (Paperwork Reduction Act) to require that the “respondent [be given] an opportunity to specify, respectively, ‘multiracial’ or ‘multiethnic’”<sup>52</sup>.

The House Subcommittee on Government Management, Information, and Technology held three hearings in April, May, and July 1997. Their objective was, in the words of its chairman Representative Horn (R-CA), to “provide an informational overview of the measurement of race and ethnicity in the federal government and to review proposed changes in

the Directive”<sup>53</sup>. The success of the multiracial lobby can be measured by numerous members of Congress who participated and the number of federal agencies and social scientists that opposed the addition of a multiracial category.

Congressmen, federal agencies, spokesmen for national minority and multiracial/multiethnic population interest groups, and social scientists gave substantial testimony. Agencies tasked with civil rights compliance, as well as the major statistical agencies, opposed altering the Directive. For example, Edward Sondik, Director of the U.S. National Center for Health Statistics, expressed some of the uncertainty and opposition of federal agencies to the addition of a multiracial category. He noted that, “Making changes as fundamental as those under consideration can be difficult and potentially disruptive,” and that “establishing a new category presents several practical and methodological challenges” and, furthermore, “changes should be made only after careful research”<sup>54</sup>.

Sociologist and demographer Mary Waters provided critical scientific testimony about potential consequences of the addition of a multiracial category. She also discussed the complex relationship among political, political-psychological, administrative, scientific, and public policy goals that had to be reconciled and her own research on “white ethnics.” Senator Daniel Akaka again argued that Hawaiians should be reclassified in the American Indian category. During the April and May hearings, the major minority population interest groups that had testified at the 1993 congressional hearings continued to articulate their strong opposition to any revisions to the Directive and to the addition of a multiracial category. The Black Caucus delegation opposed any changes, and clashed with Congressmen Newt Gingrich (R-GA) and Petri, who supported the addition of a multiracial category.

## **8. *Federal Register* Notice, July 1997**

OMB was committed to reaching a final decision by early 1997 about whether the Directive would be revised, in order to provide sufficient time for implementing a revised standard for the census 2000 “Dress Rehearsal.” The Interagency Committee completed its work in May 1997, and a third *Federal Register* Notice was issued on July 9, 1997<sup>55</sup>. This Notice was a comprehensive 74-page report of the rationale, review process, and research findings. It included a discussion of data collection, measurement, analytic, and financial cost issues associated with every proposed change to the Directive, and a six-chapter Interagency Committee report of recommendations. Principles governing the assessment process were once again identified. As in the earlier Notices, public comment was invited. The revised Directive was to take effect no later than January 1, 2003, but changes were to be included in the “Dress Rehearsal” for the Year 2000 census and then incorporated in the decennial census. (See “July 1997 Interagency Committee Proposal” column in Tables 1 and 2 for a summary of the category names and definitions.)

In contrast to the previously published Notices, the July 1997 Notice contained explicit language and examples that underscored the dependence of government agencies on the Directive for complying with statutory requirements and program administration. These included, for example, civil rights laws, Supreme Court decisions on education, employment and voting rights, affirmative action, federal government personnel, administration of Indian



affairs, contract compliance for the workforce, and veterans affairs. Although the Directive's relevance to public policy and program administration was at the core of the Directive, its importance for public administration had never been emphasized during the earlier OMB and congressional hearings because the public had focused its attention on how racial and ethnic classification, as expressed by the naming conventions in the decennial census, was a form of social identity.

The Interagency Committee's report also enumerated in general terms and through examples a wide array of costs associated with implementing a revised standard. These costs were estimated to be substantial, although no actual dollar amounts were cited, affecting not only every federal agency's data processing, management, and reporting systems, but also those in state and local governments and the private sector.

The Interagency Committee acknowledged that known problems would remain. These included the "lack of standardization for classifying data on race and ethnicity across state and federal agencies; less than optimal participation in federal surveys (especially from nonresponse); misidentification of individuals and groups in surveys; inaccurate counts and rates; inaccurate research; inaccurate program design, targeting and monitoring; and possibly misallocation of funds"<sup>56</sup>. The Committee concluded its enumeration of problems by noting that the Hispanic data would continue to be inconsistent whether or not the standard was revised, because agencies might base the denominator on the two-question race and ethnicity format and the numerator on the combined format<sup>57</sup>.

The Interagency Committee Report responded to every category revision that had been requested by congressional representatives and interest groups and to measurement problems that had been identified by research conducted prior to and during Interagency Committee review. Each item began with the Committee's recommendation, followed with supporting evidence for the recommendation, and concluded with sections that identified reasons for supporting or opposing a recommendation.

Multiple responses were permitted for people of "mixed racial identity." The Interagency Committee rejected the addition of a "Multiracial" category, justifying its decision on the basis of government research that indicated that less than three percent of the population identified itself as "multiracial." The Committee rejected the reclassification of Hawaiians in the American Indian and Alaska Native category, and also the addition of an "Arab" or "Middle Eastern" ethnic category. The four original race categories were maintained, but agencies were encouraged to collect subgroup detail.

The recommendations included changes in race or ethnic group names and instructions for data collection and minimum reporting requirements. Four name changes included: "Alaska" for "Alaskan"; "Alaska Native" for "Eskimo and Aleut"; and the addition of "or African-American" to the "Black" category. Data collectors were permitted to use additional names for the "Black or African-American" category, such as "Haitian" or "Negro," and for the "Hispanic" category, such as "Latino" or "Spanish origin," but these names were not part of the minimum standard for their respective category. "Hawaiian" was modified to "Native Hawaiian."

Definitions were altered for two racial categories. The definition of the category of "American Indian or Alaska Native" was revised to include the "original peoples from South and Central America." The "Asian and Pacific Islander" category would explicitly identify for inclusion, "Hawaii."

The minimum number of categories for a combined race and ethnicity format was specified, and the Committee urged that “both race and ethnicity or multiple races should be collected when appropriate,” but the “selection of one category will be acceptable.” A two-question format for race and ethnicity would be maintained when data were collected by self-identification; however, the order of the items was specified so that the Hispanic origin item should precede the race item when the two items were collected separately. A combined question format with a “coequal” Hispanic category was recommended “if necessary” when data were collected by observer identification (e.g., death certificate).

Minimum *reporting* requirements, with a caveat “criteria for data quality and confidentiality had to be met,” specified that data collectors must report “a minimum of one additional racial category” designated as “More than one race” to reflect the “aggregate number of multiple race respondents.” Agencies were only “encouraged” to provide greater detail about the distribution of multiple responses. If the combined race and ethnic group format were used, agencies were instructed that a “minimum of two additional categories, designated ‘Hispanic and one or more races’ and ‘More than one race’ must be included.” Subgroup detail had to be aggregated and reported to the minimum race and ethnic categories.

Any one of these changes could have potentially significant implications for both data collection and reporting, but their effects were unknown. Consequently, the Interagency Committee recommended a “phased implementation period of up to five years,” so that research could be conducted on the potential effects of the changes and agencies could make changes in data collection instruments and data processing and tabulation/reporting systems. A January 1, 1999 date was proposed for issuing OMB guidelines on writing instructions for respondents, wording of questionnaire items, and other aspects of questionnaire design.

Finally, the Notice concluded that some issues of the review “had not been resolved” and that a “number of questions” were “left unanswered,” all of which required further research<sup>58</sup>. Reflecting the intense congressional and interest group lobbying, these issues included: classification of ethnic groups of Arab or Middle Eastern origins and small population groups, such as native Hawaiians, Cape Verdeans, and Creoles (“more intensive study should be undertaken”); conceptual differences among race, ethnicity, and ancestry; multiple racial group reporting; inconsistencies in reporting race and ethnicity over time; and use of geographic origin in the definition of racial categories.

## 9. Public response to the July 1997 Notice

A barrage of press releases by minority population interest groups and multiracial organizations was immediately forthcoming. The July Notice increased national and regional media coverage of Statistical Policy Directive 15. The Notice became the subject of radio broadcasts, articles and op-ed pieces in the national, regional, and local press and large circulation magazines, many of them favoring the addition of a multiracial category or expressing sympathy for the identity of biracial or multiracial people<sup>59</sup>. Nearly every report or editorial commentary referenced the importance of the standard for the Year 2000 census, for political representation, for civil rights and anti-discrimination laws, and for distributing “billions in federal funds”<sup>60</sup>.

In addition to publicizing the policy positions of the multiracial interest groups, the media also broadcast interviews with minority population communities and organizations opposed to revisions to the Directive, particularly, the multiracial category. For example, during its early evening news, CNN broadcast an interview with a panel that included Reverend Joseph Lowery of the Southern Christian Leadership Coalition (SCLC) and Fred Fernandez of United Parcel Service<sup>61</sup>. Lowery contended that, “A number of African-Americans or the number of Hispanics is artificially reduced because of labeling, and we’re apt to lose some political empowerment.” News correspondent David George commented on a recent industry survey of 300 companies that had “estimated it would cost large employers a minimum of a quarter million dollars to comply with federal rules recognizing multiracial as a separate racial category,” to which Fernandez added, “It would certainly be a major impact, and there is general agreement that it would also have a substantial cost impact that would not produce equal, if you will, improvement in opportunities.”

In response to the Notice’s request for public comment, OMB received about 300 letters “on a variety of issues,” 7,000 preprinted postcards that opposed the Interagency Committee recommendation not to classify Hawaiians in the “American Indian and Alaska Native” category, and 500 form letters supporting adoption of a multiracial category<sup>62</sup>. American Indian tribal councils across the country wrote to register their approval for the Interagency Committee’s decision not to reclassify Native Hawaiians and to register their disapproval of the reclassification of South and Central American Indians in the American Indian and Alaska Native category.

## 10. Congressional hearing, August 1997

The release of the July 1997 Notice by OMB altered the public positions of nearly all the major stakeholders. In a complete turn-about, the federal agencies, including the agencies that monitored civil rights compliance, and all the minority population interest groups, expressed unanimous support for the Interagency Committee’s recommendations. Project RACE, the activist multiracial interest group that had successfully mobilized local and state groups throughout the country, stood alone in its rejection of the Interagency Committee’s recommendation of a checkoff for a multiple race response as a solution to the multiracial category. The Project RACE spokeswoman argued that the proposed method of tabulating multiple responses to the race item was “discriminatory,” and was designed to “uphold the one-drop rule and satisfy the minority communities”<sup>63</sup>.

Representative Meek (D-FL) of the Black Caucus continued to oppose the recommendation, arguing that OMB ought to await the results of more research before arriving at a decision<sup>64</sup>. She said that she was “very troubled” by the recommendation to permit multiple check-offs for race. Meek reminded OMB and her congressional colleagues that “the primary purpose of the racial questions on the census is to permit enforcement of both the equal protection provisions of the 14th Amendment of the Constitution and the anti-discrimination laws that past Congresses have enacted.” She added, “Permitting people to check several racial categories would not end racial discrimination in this country.” Representative John Conyers (D-MI), however, broke with his congressional Black Caucus colleagues and supported a multiracial category and specific identification of the multiple races<sup>65</sup>. This would, he said, “help individuals to identify themselves in the way they are most comfortable” and

“allow the government to continue to fight all racial discrimination.” He concluded his support for the Interagency Committee recommendation by linking classification to the fight for racial equality (“We are becoming a more color-blind society”) and the need to affirm a personal identity (to “allow people to identify their complete racial background”).

Representative Petri, who had submitted a bill to add a multiracial category (H.R. 830), announced in a prepared statement that he was ready to accept the Interagency Committee proposal and withdraw his bill if tabulations would provide information on counts for multiple responses<sup>66</sup>. The NAACP spokesman announced that the NAACP, the Association of Multi-Ethnic Americans, and Hapa (another multiracial/multiethnic lobbying organization) “had reached a preliminary consensus that, we are all people of color, all facing discrimination and with similar aspirations, we should wherever possible work together and not in opposition to one another”<sup>67</sup>. He continued, “The ‘select one or more’ option” had “admirably split the Gordian Knot that separated many of the traditional civil rights organizations from the emerging multiethnic and multiracial groups. As people of color all, we appreciate that.” Nevertheless, he concluded, it was essential that, “evidence of every act of discrimination be preserved.”

### **11. October 1997 *Federal Register* Notice**

At the end of October 1997, OMB issued the official revision of the standard<sup>68</sup>. The document presented OMB’s decisions regarding the Interagency Committee’s recommendations that were contained in the July 1997 Notice. OMB accepted nearly all the Committee’s recommendations, with one important exception. (See column “October 1997 Revision Adopted by OMB” in Tables 1 and 2.)

More than one race could be selected, and the ordering of the race and ethnicity (Hispanic origin) items was specified. Rules for membership were modified, and the list of identified nationality groups expanded for all categories. OMB ignored the American Indian position on classification of Central and South American Indians, originally classified in the White category, and officially reclassified them as members of the “American Indian and Alaska Native” category. The reasoning for this reclassification was that they now constituted a significant, that is, measurable, population group.

Several category-labeling changes were also made, including the addition of “Latino” to the ethnic category name, which would now be officially “Hispanic or Latino.” “African American” without the hyphen was added to the name of the “Black” race category<sup>69</sup>. OMB added “Native” to “Hawaiian.” OMB also slightly modified the wording of the American Indian or Alaska Native category to make the definition more consistent with the other categories.

OMB restated the use of the standards for civil rights monitoring and compliance and for all federally sponsored statistical data collection that included data on race and ethnicity. The exceptions were in those instances where sample sizes were too small to be reliable for smaller categories or data were collected on a specific racial or ethnic group, unless a variance was approved by OMB.<sup>70</sup> OMB also specified how the data on race should be reported (e.g., “Non-white” was not an acceptable designation).

Rejecting the Interagency Committee recommendation not to alter the category of “Asian and Pacific Islander,” OMB created two categories, “Asian” and “Native Hawaiian and

Other Pacific Islander.” The official reason given for splitting the original category of “Asian and Pacific Islander” into two separate categories was that the Asian populations had exhibited the greatest growth in the United States. Rules for membership were also modified, and the list of identified nationality groups expanded for all categories. The “Native Hawaiian and Other Pacific Islander” category was defined as “origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands;” however, native born were excluded<sup>71</sup>.

OMB justified changes in reclassification, a new category, and additions of named population groups in the membership of various categories as necessary in order to “retain the concept of a minimum set of categories,” and to “make possible at the same time the collection of data to reflect the diversity of our Nation’s population”<sup>72</sup>. All the same, these changes seem to indicate that OMB was not immune to political pressures from interest groups.

The result of OMB’s official decision was a *minimum* standard that created five categories: “American Indian or Alaska Native,” “Asian,” “Black or African American,” “Hispanic or Latino,” “Native Hawaiian or Other Pacific Islander,” and “White.” Agencies were encouraged to collect subgroup detail, as long as it could be aggregated to the five categories, and were also “encouraged to provide greater detail about the distribution of multiple responses.”

OMB agreed that the structural changes in the standard, particularly the “Select more than one race,” would have potentially far-reaching effects. No one could predict what would happen until analysis took place of the data from the Year 2000 “Dress Rehearsal” and the Year 2000 decennial census data. OMB concluded its observations by outlining four areas for which further research was necessary, because the numbers would have far-reaching impact on governments, business, and scientific bodies. The numbers would affect how programs were administered, the drawing of samples based on counts supplied by the decennial census, the denominator for vital statistics records that comes from the decennial census, and the interpretation of trends over time.

OMB sidestepped entirely the issue of data presentation. OMB admitted that the work of the Interagency Committee had not been completed; no solution for reporting “multiple races” had been presented<sup>73</sup>. The public and internal agency debates would now be focused on how multiple responses for race would be tabulated. This was a critical issue, as members of Congress, social scientists, and the NAACP and other interest groups, as well as federal agencies, had noted during the August 1997 congressional hearings. The guidelines had to meet constitutional and legislative mandates and provide consistent, reliable, and accurate data to monitor economic and social conditions and trends<sup>74</sup>.

Recommendations would not, however, be forthcoming for nearly 18 months, providing more evidence of the contested arena of racial and ethnic statistics. It was not until February 1999, that the Interagency Committee’s Tabulation Working Group issued a draft Interim Report that was designed to provide “guidance” on how to tabulate data on race, clarify the 1997 standards, and apply methods for “bridging” the old and new standards<sup>75</sup>. It too would be subject to extensive public deliberations before OMB issued a new *Federal Register* Notice.

## 12. Consequences for political, economic, and social life

What took place in 1973–1975 during the original development of the standard and 20 years later during the public review to revise the classification system for racial and ethnic origin sta-

tistics represents the unfolding of a complex and contentious political and bureaucratic process. As with nearly all administrative rules and regulations, this particular administrative policy had significant material, political, social, and symbolic consequences, and, as such, was salient for many groups. Categories both created and denied identity and access to resources. It is therefore not surprising that groups throughout the political system mobilized over a policy domain that had traditionally been conceived as the purview of political and bureaucratic elites, professional statisticians, and social scientists. Political solutions were to be expected, given the stakes associated with classification of racial and ethnic origin identity.

Statistical Policy Directive 15 was perceived to be an essential administrative tool for monitoring civil rights compliance and for complying with statutory and administrative program needs that were based on population classified into race and ethnic origin categories<sup>76</sup>. As the U.S. Bureau of the Census wrote in one of its planning documents for Census 2000: “Race [became] key to implementing any number of Federal laws and [was] a critical factor in the basic research behind numerous policies”<sup>77</sup>. Ethnicity data defined as “Hispanic origin” were “used in numerous programs” and “[were] vital in making policy decisions”<sup>78</sup>. Billions of dollars in intergovernmental revenues rested on the racial and ethnic origin population counts.

The significance of the Directive went far beyond the design and implementation of affirmative action laws and social policy, however. The standard prohibited the publication of statistics by “white-nonwhite” categories, and, consequently, ushered in a conceptual change in the official definition of race<sup>79</sup>. Although the status differences of the white majority and minorities continued to be maintained, the “effect of the standard was to redefine the U.S. population beyond a White and non-White classification”<sup>80</sup>. No matter that there were measurement problems that had been identified, the classification system was sufficiently robust to document that the United States was no longer a society of “White” majority and “Black” minority.

By establishing a uniform format for collecting and reporting the data, the classification system also provided policy makers with some degree of historical continuity in data, that could be used for program development and implementation. Technically, the minimum standard provided a vehicle for summarizing and tabulating a vast quantity of statistical data, which became available for analyzing the changing social, economic, and other conditions of the population. The standard was used to document disparities and differentials in income, education, health, access to information, and a host of other social welfare issues that would eventually find their way onto the public policy agenda.

The original standard stated, and the *Federal Register* Notices reiterated, that the classification system did not have its basis in genetics or biology—it was not presumed to be scientific or anthropological in its conceptual underpinnings. Nevertheless, official classification reinforced a conception of scientific authority, neutrality, and objectivity. The categories took on a reality that was further reinforced by their use for research as key stratifying and classifying “variables” of the population under investigation, and this research became the justification for public policy design and implementation.

While it was true that the standard’s origins were the legal enforcement of civil rights, it had not been designed to confer legal status<sup>81</sup>. Nevertheless, the categories that identified protected groups created a widespread perception that the standard was responsible for con-

ferring legal status as a protected class for civil rights compliance. This perception extended to Congress and interest groups, as was evidenced by both support for and opposition to racial and ethnic group classification during congressional hearings on the decennial census and Statistical Policy Directive 15 between the late 1970s and mid-1990s.

The creation of these categories also served as a powerful “referent to reinforce group consciousness and social recognition,” and also to mobilize an array of minority population stakeholders that lobbied Congress on behalf of public policy initiatives<sup>82</sup>. Administrative agencies, but especially the U.S. Bureau of the Census, were not immune to political pressure from minority population groups and their congressional advocates<sup>83</sup>. To respond to minority population concerns about representation and access to resources, which an ethnic group, race, or national ancestry category label was perceived to represent, the number of subgroups within the categories expanded from year to year in administrative record-keeping systems.

As evidenced by the letters, petitions, and testimony of “white ethnics,” the Directive was an outcome of racial politics. The standard was perceived as contributing to racial divisions rather than harmony in the society. Racial and ethnic categorization unintentionally reinforced historic and still present negative racial and ethnic stereotypes. Moreover, it further intensified perceptions by opponents of social welfare programs, affirmative action, and immigration policies, that the standard was responsible for the differential and inequitable treatment that benefited those protected groups at the expense of the white majority. For the white ethnic groups, the categories established by the classification system represented exclusion rather than inclusion in the body politic and a loss of power and benefits. The “American story” no longer included their contributions.

While not always explicitly referenced in the public record, the debate over revising Statistical Directive 15 resonated with the large-scale social and economic structural transformations and the larger policy debates taking place in the political system. Disputes about the standard must be also seen as part of the political arena of current issues associated with the rise of identity politics, demographic changes due to the growth of minority populations through immigration, the growth of multiracial and multiethnic populations through intermarriage, the decline in expenditures for social programs, government as intrusive and an agent of special interests, and ambivalence about and opposition to entitlements based on a history of oppression, discrimination, and racism. The OMB review reflected the tendentious political environment of the nation.

### 13. Conclusion

Among the many lessons that government documents specialists can take away from the history of Statistical Policy Directive 15 is that classification systems are not neutral tools that objectively reflect and measure the empirical world. Classification systems cannot be isolated from the larger political setting. They are tightly linked to public policies, and, in the case of racial and ethnic group classification, highly contested social policy about which there is little public consensus. Administrators are not immune to political pressure, and they *do* respond politically by accommodating the stakeholders of administrative policy. Congress is an important stakeholder, acutely sensitive to the consequences of administrative

rules and regulations for their constituents, particularly those that have the potential for exacerbating political divisions in the electorate and are also perceived to affect electoral power, as occurs through legislative redistricting based on the population counts derived from the decennial census.

Governments everywhere have, for centuries, routinely relied on classification systems to organize their administrative record keeping and statistics in order to fulfill a host of administrative responsibilities and to assess the welfare of their nation. Classification systems have always been a potent symbol of recognition and a vehicle for social identity, enfranchisement, and entitlement. They will thus always engage the body politic in conflict, negotiation, accommodation, and compromise.

## Notes

1. This name was acquired while the statistical policy function was at the Department of Commerce in the Office of Federal Statistical Policy and Standards (OFSPS), whose function was later transferred to the OMB's Office of Information and Regulatory Affairs. This article continues reference to the standard by its widely known name of "Statistical Policy Directive 15," although the name change took effect during 1998.

2. U.S. Office of Management and Budget, "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity," *Federal Register* 210, no. 62 (30 October 1997): 58782–90.

3. U.S. Office of Management and Budget, *Draft Provisional Guidance on the Implementation of the 1997 Standards for the Collection of Federal Data on Race and Ethnicity* (Prepared by Tabulation Working Group Interagency Committee for the Review of Standards for Data on Race and Ethnicity) (Washington, DC: OMB, February 17, 1999) available from <<http://www.ccsso.org>>.

4. See Alice Robbin, "The Problematic Status of Statistics on Race and Ethnicity: An 'Imperfect Representation of Reality'," *Journal of Government Information*, 26, no. 5 (September/October 1999): 467–83.

5. Katherine K. Wallman and John Hodgson, "Race and Ethnic Standards for Federal Statistics and Administrative Reporting," *Statistical Reporter* 77, no. 7 (July 1977): 450–4; Katherine K. Wallman, "Statistics for Americans of Spanish Origin or Descent," *Statistical Reporter* 78, no. 2 (February 1978): 148–52.

6. U.S. Federal Interagency Committee on Education, *Report of the Ad Hoc Committee on Racial and Ethnic Definitions* (Washington, DC: Department of Health, Education, and Welfare, April 1993), 1.

7. *Report of the Ad Hoc Committee on Racial and Ethnic Definitions*, 2.

8. Wallman and Hodgson, "Race and Ethnic Standards." See also U.S. House, Committee on Post Office and Civil Service, *Economic and Social Statistics for Americans of Spanish Origin: Hearing before the Subcommittee on Census and Population of the Committee on Post Office and Civil Service*, 94th Cong., 1st sess., 1975. Hispanic population data had been collected in earlier census enumerations. In 1980, however, on the basis of the Directive, the U.S. census schedule was officially expanded to include "Item 7. Is this person of Spanish/Hispanic origin or descent?"; and three ethnic groups were specifically identified by name (Mexican/Chicano, Puerto Rican, Cuban).

9. Wallman and Hodgson, "Race and Ethnic Standards," 452.

10. Wallman and Hodgson, 453–4. The 1970 Census of Population was the first census in which self-identification of race and ethnicity took place, but the Bureau of the Census is most likely the only agency that utilized this method at that time. The U.S. Bureau of Labor Statistics did not employ self-identification until the 1980s.

11. In years following the promulgation of the standard, few agencies, except the Bureau of the Census, were to take advantage of the "permissive" nature of the standard (i.e., to collect more detailed subgroup data, as long as the data could be aggregated into the four minimum categories).

12. Wallman and Hodgson, "Race and Ethnic Standards," 450–4.

13. The Wallman and Hodgson article does not state outright that agencies opposed self-identification; however, their lengthy justification implies significant agency opposition. Furthermore, testimony presented years later during congressional hearings held in 1993 and 1997, and *Federal Register* notices issued in 1994, 1995, and



1997, make clear longstanding opposition by federal agencies, particularly those tasked with civil rights monitoring and compliance.

14. Wallman and Hodgson, "Race and Ethnic Standards," 454. OFSPS explained that third party identification would continue to be necessary because respondents might misunderstand the reasons for data collection, object to identifying their racial or ethnic background, or object to placing themselves in one of five mutually exclusive categories, especially those of mixed racial or ethnic backgrounds. Furthermore, agencies did not always have direct contact with respondents and relied on a third party to carry out the data collection (e.g., affirmative action compliance reporting by banks, firms, and educational institutions). At the same time, however, to encourage self-identification, the OFSPS proposed that agencies explain the rationale for the data collection, its use, and steps taken to "prevent the use of data for discriminatory purposes," explain that the categories did not reflect an attempt to develop an "anthropologically precise description of the persons surveyed, but rather [were intended] to obtain information on who may be subject to discrimination" because of the person's heritage, and provide the complete wording of the category names and their definitions, in order to prevent "misunderstandings which abbreviations may cause."

15. Wallman and Hodgson. Two caveats limited use of this category, however. The agency was required to aggregate responses into one of the approved categories when presenting (reporting) the data; and the category label of "Other" was "permissible only when the data were collected by self-identification," (i.e., not observer-obtained). In fact, only the Bureau of the Census was granted an exemption to Directive 15, and could officially offer the category of "Other."

16. Some of the government documents that recorded these concerns during this period include: U.S. Congress, General Accounting Office, *Health and Nutrition: Collection of Vital Statistical Data on Hispanics* (AO/HRD-88-68BR) (Washington, DC: General Accounting Office, March 1988); U.S. Department of Commerce, Bureau of the Census, *1990 Census of Population and Housing Content Determination Reports Race and Ethnic Origin* (1990 CDR-6) (Washington, DC: Bureau of the Census, February 1991); U.S. Congress, General Accounting Office, *Federal Data Collection Agencies' Use of Consistent Race and Ethnic Definitions* (GAO/GGD-93-25) (Washington, DC: General Accounting Office, December 1992); Statistics Canada and U.S. Department of Commerce, Bureau of the Census, *Challenges of Measuring an Ethnic World: Science, Politics and Reality* (Washington, DC: U.S. Government Printing Office, 1993); U.S. Congress, General Accounting Office, *Census Reform: Early Outreach and Decisions Needed on Race and Ethnic Questions* (GAO/GGD-93-36) (Washington, DC: General Accounting Office, January 1993); Claudette Bennett and J. Gregory Robinson, "Racial Classification Issues Concerning Children in Mixed Race Households" (paper presented at the 18th National Conference on Blacks in Higher Education, Washington, DC, March–April 1993); U.S. Department of Commerce, Bureau of the Census, *1993 Research Conference on Undercounted Ethnic Populations* (Washington, DC: Bureau of the Census, October 1993).

17. While this article focuses attention on the role that statisticians and demographers played in the government review of the standard, it is important to note that there is a significant corpus of research conducted by anthropologists, ethnographers, historians, political scientists, and sociologists, who have contributed important assessments of the quality of census data on ethnicity and ancestry. Two detailed critiques of the classification of the ethnicity and ancestry items in the 1980 census are: William Douglass, "Ethnic Categorization in the 1980 U.S. Census: The Basque Example," *Government Publications Review* 12, no. 4 (1985): 289–98; Robert Magocsi, "Are the Armenians Really Russians?—Or How the U.S. Census Bureau Classifies America's Ethnic Groups," *Government Publications Review* 14, no. 2 (1987): 133–68. Articles that discuss the difficulties of interpreting national origin and ethnicity statistics derived from national censuses include: N.B. Ryder, "The Interpretation of Origin Statistics," *Canadian Journal of Economics and Political Science* 21, no. 4 (1955): 466–79; William Peterson, "The Classification of Subnations in Hawaii: An Essay in the Sociology of Knowledge," *American Sociological Review* 34, no. 6 (1969): 863–77; Sharon M. Lee, "Racial Classifications in the US Census: 1890–1990," *Ethnic and Racial Studies* 16, no. 1 (1993): 75–94. These analyses demonstrate that classification systems are powerful instruments of social identity and reflect power relations in a society. The difficulties of collecting and interpreting these types of data are also discussed by Tom W. Smith, "Ethnic Measurement and Identification," *Ethnicity* 7 (1980): 78–95; and Juri Stratford, "Responding to Reference Queries for Numeric Data and the Problems Inherent in Interpreting Statistical Sources: A Note," *Journal of Government Information* 25, no. 5 (1998): 413–7.

18. U.S. Office of Management and Budget, “Proposed Guidelines for Federal Statistical Activities,” *Federal Register* 53, no. 12 (20 January 1988): 1542–52; U.S. Office of Management and Budget, “Standards for the Classification of Federal Data on Race and Ethnicity,” *Federal Register* 59, no. 110 (9 June 1994): 29833.

19. “Standards for the Classification,” 29833.

20. No public document, including the four *Federal Register* notices, identifies by name the multiracial or multiethnic groups or the “large corporations” that supported or opposed the OMB 1988 proposal. The only multiethnic organization that was sufficiently organized during this period was the Association of MultiEthnic Americans (AMEA). Project RACE was created in 1991.

21. U.S. Office of Management and Budget, “Standards for the Classification,” 29833.

22. These agencies included the U.S. Departments of Justice and Health and Human Services, Equal Employment Opportunity Commission (EEOC), and U.S. Office of Personnel Management.

23. U.S. House, Committee on Post Office and Civil Service, *Review of Federal Measurement of Race and Ethnicity: Hearings before the Subcommittee on Census, Statistics and Postal Personnel*, 103rd Cong., 1st sess., 14 April, 30 June, 29 July, 3 November 1993, 223–4.

24. *Review of Federal Measurement of Race and Ethnicity*, 216.

25. A brief summary of the controversy is provided in Suzann Evinger, “How to Record Race,” *American Demographics* 18 (May 1996): 36–41.

26. Representative Sawyer noted during the hearings that he had heard from Ohio constituents. A number of the letters and petitions received by OMB following the three *Federal Register* notices originated from Ohio residents.

27. Lawrence Wright, “The Illusion of Race in the United States,” *Sacramento Bee*, August 28, 1994 available from <<http://web.lexis-nexis.com/universe>> (November 20, 1997).

28. The National Council of La Raza is an umbrella group that represents more than 200 community-based Hispanic groups.

29. They represented parental and community organizations that operated at state and local levels to apply pressure on schools to modify their administrative forms.

30. *Review of Federal Measurements on Race and Ethnicity*, 213–20.

31. It would, however, be two years before the final report of the workshop was published. The intent of the workshop appears to have been most modest: document a history of and problems with the Directive, summarize research findings in race and ethnic identification, suggest an agenda for research, establish objectives for a federal standard, and offer possible options for revising the Directive. More than likely, the workshop visibly demonstrated to Congress what was probably more important—that the administrative agencies had initiated activity on a controversial policy issue. Barry Edmonston, Joshua Goldstein, Juanita Tamayo Lott, eds., *Spotlight on Heterogeneity: The Federal Standards for Racial and Ethnic Classification. Summary of a Workshop* (Washington, DC: National Academy Press, 1996).

32. Evinger, “How to Record Race,” 2.

33. “Standards for the Classification of Federal Data on Race and Ethnicity.” The *Federal Register* notice announced four activities that would be “an integral part of the review process,” although two of them had already taken place (a workshop sponsored by the Committee on National Statistics and formation of an Interagency Committee).

34. The public testimony of the congressional and OMB hearings, as well as letters received following the *Federal Register* notices, shows that the public mostly ignored “administrative purposes,” insofar as “comparability” and “exchange across agencies” were concerned.

35. During an informal interview conducted by the author, the OMB staff person assigned to the review commented that it was “highly unusual” that OMB left Washington to conduct hearings. The June 1994 Notice had originally identified only Boston, Denver, and San Francisco as the locations for these hearings. When the author asked the OMB staff person what had led to the addition of the fourth hearings, in Honolulu, this person responded, “A request of Senator Daniel Inouye of Hawaii.”

36. This testimony was nearly 450 pages, not counting hundreds of pages of prepared statements. U.S. Office of Management and Budget, *Public Hearing in the Matter of Standards for the Classification of Federal Data on Race and Ethnicity*, Boston, July 7, 1994 (mimeo.); *Public Hearing on Standards for the Classification of Federal Data on Race and Ethnicity*, Denver, July 11, 1994 (mimeo.); *Public Hearing on Racial and Ethnic Standards*,

San Francisco, July 14, 1994 (mimeo); *Public Hearing on Standards for the Classification of Federal Data on Race and Ethnicity*, Honolulu, July 18–19, 1994 (mimeo). OMB also made the transcripts available in four data files, not including the written statements that had been provided by the witnesses.

37. These representatives were from the Association of MultiEthnic Americans, Coalition for an Accurate Count of Asian Pacific Americans, Project RACE, and the Arab-American Institute. Legislative representatives from Congress included a member of the staffs of Representative Franks of Massachusetts and Senator Akaka of Hawaii, who reiterated their 1993 congressional testimony on behalf of Cape Verdeans and the reclassification of the Native Hawaiian into the Native American category, respectively.

38. They included 19 Hawaiian, Pacific Islander, Samoan, Cambodian, and Chinese organizations: Hawaiian Civic Club, Ho'omau, Hawaii Inter-Council of Southern California, Pacific American Foundation, E Maii Ana Ka Olelo Hawaii, Inter-Club Council of Southern California, Ainehau O Kaleponi Hawaiian Civic Club of Orange County, Hui O Hawaii, Women's Organization for the National Island Women's Association, National Office of Samoan Affairs, National Island Women's Association, [Samoan] Alumni Association of Northern California, Samoan Federation of America, Samoan Council of Chiefs, Cambodian New Generation, Chinese for Affirmative Action (on behalf of the National Coalition for an Accurate Count of Asian Pacific Americans), Asian and Pacific Islander American Health Forum, Asian and Pacific Islander Center for Census Information and Services, and the Asian Law Alliance.

39. The supporting documentation consisted of newspaper articles and transcripts from radio or television broadcasts; statistical reports; administrative forms and reports; case law and law suits; histories of disputes with local, state or federal authorities; unpublished and published articles and papers presented at conferences; testimony presented at the OMB hearings during July 1994, which incorporated additional thinking; as well as petitions, photographs, and letters written by other individuals; resolutions of municipalities and state legislatures; and transmittal letters from legislative representatives and governmental agencies.

40. It is important to note that agencies independently solicited comments from their constituencies, but the OMB public comment does not contain what was directly received by the agencies, which may or may not have been forwarded to OMB. From the author's informal conversations with agency staff, it appears that most letters were not forwarded to OMB or, if they were, they were not included in the public comments that OMB maintained in its Docket Room. It should be noted that OMB is not legally required to make public the letters it received. The Office did so, however, because of the substantial public interest in the governmental review.

41. Project RACE was highly effective in mobilizing people to write letters, and nearly every letter advocating the addition of a "Multiracial" category registered support for Project RACE's position. The author's analysis of the public comments reveals that adults whose family or friends had a bi- or multiracial child wrote more than one-third of the letters.

42. White ethnics constituted about 10 percent of the letters received by OMB between July and December 1994.

43. Meetings of the Interagency Committee were, however, closed to the public, and internal memoranda did not circulate beyond Committee members, who were silent about what transpired. OMB "clamped a tight lid" on them, and one must read the *Federal Register* notices to get any sense of the disagreements that embroiled the Committee. This disagreement is, however, reflected in the structure of the presentation in the notice, in which the "pros-and-cons" of every recommendation are discussed. This is another way of reflecting disagreement, without having to state it outright, as was explicitly stated in the *Report of the Ad Hoc Committee on Racial and Ethnic Definitions* issued by U.S. Federal Interagency Committee on Education.

44. U.S. Office of Management and Budget, "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," *Federal Register* 62, no. 131 (July 9, 1997): 36881.

45. Deseret News Services, "Classifying Race Still a Hefty Issue for Census," *Deseret News Archives*, 28 September 1997, available from <<http://www.desnews.com/>> [accessed November 27, 1997].

46. U.S. Department of Education, National Center for Education Statistics, *Racial and Ethnic Classifications Used by Public Schools* (NCES 96-092) (Washington, DC: National Center for Education Statistics, 1996); U.S. Department of Labor, Bureau of Labor Statistics, *Testing Methods of Collecting Racial and Ethnic Information: Results of the Current Population Survey Supplement on Race and Ethnicity* (BLS Statistical Note 40) (Washing-

ton, DC: Bureau of Labor Statistics, 1996); U.S. Department of Commerce, Bureau of the Census, *Findings on Questions on Race and Hispanic Origin Tested in the 1996 National Content Survey* (Population Division Working Paper Series) (Washington, DC: Bureau of the Census, 1996); U.S. Department of Commerce, Bureau of the Census, *Results of the 1996 Race and Ethnic Targeted Test* (Population Division Working Paper 18) (Washington, DC: Bureau of the Census, 1997).

47. U.S. Office of Management and Budget, “Interim Notice of Review and Possible Revision of OMB’s Statistical Policy Directive for the Classification of Federal Data on Race and Ethnicity,” *Federal Register* 60, no. 166 (28 August 1995): 44673–93.

48. “Coalition Statement in Opposition to Revisions of OMB Directive 15 (NAACP, National Urban League, Lawyer’s Committee for Civil Rights Under Law, Joint Center for Political and Economic Studies,” cited by Harold McDougall, Director of the Washington Bureau of the NAACP, in testimony presented before Congress in May 1997. U.S. House, Committee on Government Reform and Oversight, *Federal Measures of Race and Ethnicity and the Implications for the 2000 Census: Hearings before the Subcommittee on Government Management, Information, and Technology*, 105th Cong., 1st sess., 23 April, 22 May, 25 July 1997, 314–6.

49. *Federal Measures of Race and Ethnicity*, 398–411.

50. Interracial Voice, *Multiracial Solidarity March I & II Speeches*, available from <[http://222.webcom.com/~intvoice/msn\\_arch.html](http://222.webcom.com/~intvoice/msn_arch.html)> [accessed 28 November 1997].

51. Laws were, however, implemented in only three states (Georgia, Indiana, and Ohio), because state officials were awaiting the federal decision on the Directive. *Federal Measures of Race and Ethnicity*, 176–208.

52. *1997 History of Bills Online* via GPO Access, available from <<http://wais.access.gpo.gov/>> [accessed 17 November 1997].

53. *Federal Measures of Race and Ethnicity*, 2.

54. *Federal Measures of Race and Ethnicity*, 154.

55. U.S. Office of Management and Budget, “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,” *Federal Register* 62, no. 131 (9 July 1997): 36874–946.

56. “Recommendations from the Interagency Committee,” 36883.

57. “Recommendations from the Interagency Committee,” 36883.

58. “Recommendations from the Interagency Committee,” 36944.

59. Deborah Sharp, “Registering Race: Census Battle Brewing: Family Pushes for New Category on School Forms,” *USA Today*, 5 September 1995, available from <<http://web.lexis-nexis-com/>> [accessed 27 November 1997]; “Multiracial Checkoff is a Vote for Accuracy” (Editorial), *San Francisco Chronicle*, 8 June 1997, p. 10, available from <<http://www.sfgate.com/cgi-bin/chronicle/>> [accessed 28 November 1997].

60. Barbara Vobejda, “House Votes to Block Census from Using Statistical Sampling,” *TRIB Net The News Tribune*, 1 October 1997, available from <<http://search.tribnet.com/archive/1097/1001a43.htm>> [accessed 27 November 1997].

61. Cable News Network, “Racial Classification in Question as 2000 Census Approaches,” *CNN Prime News*, 8 July 1997 (Transcript #97070802V21). See also Cable News Network, “Racial Classification in Question as 2000 Census Approaches,” *Washington Unwrapped*, 9 July 1997 (Transcript #97070908FN-L07); National Broadcasting Company, “Census in Year 2000 May Be Beginning of Different Accounting Method for Racial Distinctions,” *NBC Nightly News*, 8 July 1997; National Public Radio, “No to Multiracial,” *All Things Considered*, 8 July 1997 (Transcript #97070816-212) available from <<http://web.lexis-nexis.com/universe/>> [accessed 27 November 1997].

62. “Revisions to the Standards,” 58781–58790.

63. *Federal Measures of Race and Ethnicity*, 555.

64. *Federal Measures of Race and Ethnicity*, 537–8.

65. *Federal Measures of Race and Ethnicity*, 535–6.

66. *Federal Measures of Race and Ethnicity*, 524.

67. *Federal Measures of Race and Ethnicity*, 588.

68. “Revisions to the Standards,” 58781–90.

69. Ethnographic research revealed that Caribbeans prefer “Black” because “African American” denotes the native-born.

70. “Revisions to the Standards,” 58789.

71. The wording reads, “The term ‘Native Hawaiian’ does not include individuals who are native to the State of Hawaii by virtue of being born there.” “Revisions to the Standards,” 58786.

72. “Revisions to the Standards,” 58787.

73. Steven A. Holmes, “People Can Claim More than 1 Race on Federal Forms, *New York Times*, October 30, 1997, A1, A19; Peter Schmidt, “U.S. to Let People Choose Multiple Races on Forms; Big Changes Expected in Data,” *The Chronicle of Higher Education*, October 31, 1997 [Academe Today: News update] available from <<http://chronicle.com/che-data/news.dir/dailarch.dir/97103104.htm>> [accessed October 31, 1997].

74. “Revisions to the Standards,” 58786.

75. U.S. Office of Management and Budget, *Draft Provisional Guidance*. Note that this report was originally not issued by OMB as a draft in the *Federal Register*; instead, the report was made available on the web by the Council of Chief State School Officers Education Information Advisory Committee (EIAC) at <[www.ccsso.org](http://www.ccsso.org)>. OMB did not make it available until many months later at <<http://www.whitehouse.gov/OMB/infoereg/index.html>>.

76. U.S. Department of Commerce, Bureau of the Census, *Preparing for Census 2000: Subjects Planned for Census 2000; Federal Legislative and Program Uses* (Washington, DC: Bureau of the Census, 1997).

77. *Preparing for Census 2000*, 15.

78. *Preparing for Census 2000*, 20.

79. *Review of Federal Measurement of Race and Ethnicity*, 38.

80. *Review of Federal Measurement of Race and Ethnicity*, 38.

81. Barry Edmonston, Joshua Goldstein, and Juanita Tamayo Lott, Eds., *Spotlight on Heterogeneity: The Federal Standards for Racial and Ethnic Classification. Summary of a Workshop* (Washington, DC: National Academy Press, 1996), 8.

82. *Spotlight on Heterogeneity*, 8–10.

83. *Review of Federal Measurement of Race and Ethnicity*, 3–36.