

Bob Sivinski, Chair  
Interagency Technical Working Group on Race and Ethnicity Standards  
1650 17th St. NW, Washington, DC 20500  
[Statistical\\_Directives@omb.eop.gov](mailto:Statistical_Directives@omb.eop.gov)

Dear Mr. Bob Sivinski:

Global Black is a transnational advocacy and strategy organization dedicated to building power in the Global African Diaspora through connecting, collective advocacy, strategizing, and amplifying issues of concern to members of the global Black family.

In its initial proposal, the U.S. Office of Management and Budget (OMB) identified updating the Race and Ethnicity Statistical standards as a top priority to ensure that the standards better reflect the diversity of the American people.

The OMB Interagency Technical Working Group on Race and Ethnicity Standards, in its initial proposal, recommends collecting race and ethnicity information using one combined question. We are aware that these recommendations are preliminary and that feedback is needed to help guide the development of final recommendations.

Combining the question will not accurately capture the diversity and complexity of the Afro-Latino community in the United States.

Afro-Latinos are people of African descent who are also of Latin American or Caribbean origin. Despite being an integral part of the Latino community, their unique cultural and historical experiences are often overlooked in discussions about race and ethnicity in the United States. This has led to a lack of representation and resources for the Afro-Latino community, which has resulted in disparities in health outcomes, education, and economic opportunities.

Combining Hispanic ethnicity and race into one question will contribute to undercounts in the AfroLatino community. The Census Bureau's 2015 National Content Test (NCT) was inconclusive; however, it is very likely that AfroLatino numbers did decrease and would continue to do so.

According to this proposed change by the OMB years from now, most Hispanics would check the box and even write in a detailed origin (e.g., Puerto Rican, Mexican, Honduran, etc.) but nothing else about their race. We cannot assume that they all occupy the same racial status for civil rights enforcement. This potential change in our data infrastructure could have far-reaching, enduring, and damaging consequences on our ability to document and eliminate anti-Blackness in Latino communities across various policy domains, including voting rights, housing, employment, education, and health care access.



Revising the question on race/ethnicity to include a separate category for Afrolatinos would be a positive step towards addressing these disparities. By adding a separate category for Afrolatinos, the U.S. government would recognize this community's unique cultural and historical experiences, which would lead to better representation and resources for Afrolatinos. This would also allow for more accurate data collection and analysis of the Afro-Latino community, which would help policymakers develop targeted strategies to address disparities and promote equity.

We are attaching additional points to consider.

- Many "Afro-Latino" immigrants have come, in waves, over decades, to the United States, enriching the human and cultural landscape, especially from Central America, South America, and the Caribbean (e.g., close to 50% of the Brazilian population and over 25% of the Colombian populations are people of African descent).
- A 2014 Pew Research Center survey of Latino adults shows that a quarter of all U.S. Latinos identifies as Afro-Latino, Afro-Caribbean, or African descent with roots in Latin America. The first time a nationally representative survey in the U.S. directly asks the Latino population if they consider themselves Afro-Latino.
- In May 2022, Pew Research Center reported an estimated six million Afro-Latino people in the United States, comprising 2% of the adult U.S. population, and 12% of adult Latinos.

Thank you for your attention to this critical matter. We urge the Office of Information and Regulatory Affairs, Office of Management and Budget, and Executive Office of the President to consider changing the question on race/ethnicity to include a separate category for Afro-Latinos. This would be an essential step towards promoting equity and inclusion for all Americans. Please do not hesitate to contact us if you have any questions about this issue or would like to set up a meeting to discuss the policy implications of these proposed changes for generations to come.

Sincerely,



Global Black



### Points of Consideration

1. Latin@s have always been treated differently by race even if they are of the same ethnicity: Flattening the difference between race and ethnicity is ahistorical at best and . In the 1947 Mendez vs. Westminster desegregation case, Mexican American students who were not visible minorities were allowed to attend school with whites. It was only when The difference between race (social construction based on meanings ascribed to physical characteristics) and ethnicity (cultural background) is real. See attached resources on the value added by maintaining two separate questions on Hispanic ethnicity and race for revealing and ameliorating racial inequities within Latin@ communities across a variety of social outcomes (e.g., housing, employment, voting rights, education, etc.)
2. Garbage in, Garbage Out: making Hispanic ethnicity and race co-equal and analytically equivalent will lead to unusable data. Basic social science research is premised on the idea that you can't use one question for two analytically distinct constructs (e.g., you can't measure gender and sexuality in one question).
3. Project the Outcome of this change for future of Equity Metrics and Distribution of Resources: What do you think will happens to data used to protect civil rights and measure racial discrimination in voting rights, fair housing, equal employment, health care access? Imagine ten to twenty years from now, when the most Hispanics will check the box and even write in a detailed origin (e.g., Puerto Rican, Mexican, Honduran, etc.), but nothing else about their race? The 2020 Census format found "Two or More" races was the second largest racial group. When one marks multiple boxes, it is not clear how this will impact civil rights metrics (e.g., Louisiana counts as black only those who identify as Black alone and Black and white, but no one else). Will two or more be the largest racial group in the 2030 Census? What will that mean for civil rights metrics?
4. Mitigating Undercounts: Will the combined Hispanic ethnicity and race question format contribute to reductions in the number of people that would have identified as AfroLatin@ in the previous two separate question formats? The Census Bureau's 2015 National Content Test (NCT) was inconclusive; however, it is very likely that AfroLatin@ numbers did decrease and would continue to do so in the future. More testing specifically on the impact of the combined question on undercounts is paramount before any potential changes are considered.
5. Inconvenient truth: You can't deny or ignore that Latin@s are comprised of different races. In making Hispanic ethnicity co-equal with race, are we assuming that all Hispanics/Latin@s are part of a "Brown monolith"? Who benefits from color and power evasive data about Latin@s
6. Ontological Violence & Erasure: Pretending that Blackness exists outside of Hispanic ethnicity is part and parcel of discursive violence and antiBlackness, regardless of intent.
7. Dismantling the Myth of a Brown Monolith: Pretending that Latin@s are racialized in similar ways contributes to color and power evasiveness.



8. Scientific Integrity: The preponderance of research that employs the two part question has made the invisible visible by documenting the materiality of anti-Blackness within Latinx communities. If the proposed changes go forward this type of inquiry and knowledge production would be nullified.
9. Employing an Intersectionality as Inquiry and Praxis: In order to interrogate within in group racial differences in employment discrimination, housing discrimination, we need analytically distinct concepts, questions (e.g., are there wage differences between U.S.-born white Colombian women who earned 4-year college degrees and U.S.-born Black Colombian women?) If adopted, the combined Hispanic ethnicity and race question will nullify our ability to do intersectional analysis, which was possible with the two-question format.
10. Do no harm: Given that there was no conclusive test of the potential harm that a combined question could have on our ability to discern inequities for AfroLatin@s, we need a moratorium until adequate testing is done and a critical mass of AfroLatin@ scholars with expertise in these communities are able to be at the table when decisions are made.

