

Inadequacies with the Testing of OMB Proposal for a Single Question on Race

It is misplaced to support the proposal for a combined Race and Ethnicity question based on the presumption that the Census Bureau's 2015 National Content Test (NCT) concluded that the count of AfroLatinos (and other Blacks) would not be affected by the change.

In fact, the test was inconclusive, and its deficiencies outlined below suggest why the proposal actually would detrimentally affect Afro-Latinos, and other Latinos who would select a racial category.

1. The combined question proposal records a race for significantly fewer Latinos (both statistically and substantively)

Howard Hogan, Former Chief Demographer of the Census Bureau, "[Do Race and Color Still Matter? Considerations on the Combined Question,](#)" paper presented at University of New Mexico, Race+Ethnicity+Intersectionality Convening (Dec 2022)

2. There is evidence that the combined question will reduce the reporting of Black, Asian and Indigenous Latinos

["Do Race and Color Still Matter? Considerations on the Combined Question by Dr. Howard Hogan.](#)

3. The testing failed to include Latino respondents in the Northeast, which is where the density of AfroLatinos reside. Which means that this sample is highly based on Latinos in the southwest and west where there are less Latino populations that are likely to report as Black.

[2015 National Content Test Race and Ethnicity Analysis Report p. 283](#)

4. The testing was only done via mail-in surveys with no follow up for non-responses as done on actual census taking to address the undercount of non-Whites.

["Do Race and Color Still Matter? Considerations on the Combined Question by Dr. Howard Hogan.](#)

5. The government Advisory Committees for the OMB and the Census have not included AfroLatino representatives that could provide much needed intersectional ethnic / racial insights on how AfroLatinos experience racial exclusion and discrimination from non-Black Latinos.

Tanya Kateri Hernandez, *Racial Innocence: Unmasking Latino Anti-Black Bias and the Struggle for Equality* (2022).

6. The test will be 15 years old by the time of the 2030 Census and the testing was done before the pandemic and other conditions that have caused us to re-examine the way we talk about race in this country enabling us to better understand the intersectional racial experiences of AfroLatinos that are distinctive from non-Black Latinos, and more parallel with those of African Americans.