



# FASEB

Federation of American Societies  
for Experimental Biology

## Representing Over 115,000 Researchers

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March 20, 2023

Bob Sivinski

Chair, Interagency Technical Working Group on Race and Ethnicity Standards

Executive Office of the President

Office of Management and Budget

1650 17<sup>th</sup> St., NW

Washington, DC 20500

RE: OMB-2023-0001-0001, "Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards"

*Transmitted electronically via Regulations.gov on March 20, 2023*

Dear Mr. Sivinski,

As an organization representing 27 scientific societies and over 115,000 individual researchers in the biological and biomedical sciences, the Federation of American Societies for Experimental Biology (FASEB) appreciates efforts by the White House Office of Management and Budget (OMB) and the Interagency Technical Working Group on Race and Ethnicity Standards (Working Group) to revise and update OMB's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15) to be more reflective of the diversity across the U.S. and improve understanding of racial and ethnic identities of survey respondents. As noted in the *Federal Register* notice announcing this call for public comments, "there have been large societal, political, economic, and demographic shifts," in the over 25 years since the last update. FASEB applauds the Working Group for its active engagement of the stakeholder community as part of this current update. Overall FASEB supports OMB's efforts to develop and implement a more refined framework for collecting race and ethnicity data as proposed in this request for information. Our feedback reflects the input of FASEB's Committee on Diversity, Equity, Accessibility, and Inclusion (DEAI), ratified by our Board of Directors, and addresses only those areas for which we could offer meaningful input.

### **1. Collect race and ethnicity information using one combined question.**

FASEB supports the Working Group's proposal to collect race and ethnicity data as a single question versus the current two. Our group agreed that the two-question structure is exclusionary and noted that shifting to a single question that allows for multiple selections would give respondents a mechanism through which to self-report all aspects of their identity. However, we also appreciate that consolidation of the two questions may limit longitudinal analysis of data collected through the current format. Similarly, analysis of data collected through a consolidated question will need to address single- and

multiple-response categories. This will likely lead to several combinations with small response numbers that will need to be suppressed in public reporting.

**2. Add “Middle Eastern or North African” (MENA) as a new minimum category.**

FASEB strongly supports the addition of MENA as a new minimum category, and this update would reflect updates being made by non-federal entities, such as academic institutions and professional organizations. Under the current structure, individuals identifying as MENA are included in the “white” category. Addition of the MENA category would enhance understand of the life experiences and wellbeing of individuals identifying as MENA.

**3. Require the collection of detailed race and ethnicity categories by default.**

Overall, FASEB is supportive of collecting more detailed information for each of the minimum categories. Allowing respondents to fully define their racial and ethnic identities is an important step to recognizing and appreciating the diversity across the U.S. In turn, this information could reduce the tendency to approach these groups as monoliths when formulating and implementing public policy. However, FASEB also recognizes that the expanded collection could seem daunting to respondents or might not be appropriate for every survey. Similarly, the flexibility of allowing respondents to add their own details via open-ended text boxes could present challenges for data analysis.

**4. Update Terminology in SPD 15.**

FASEB applauds the Working Group’s proposals to update terminology used throughout SPD 15, particularly the elimination of offensive descriptions in the minimum category definitions. We also support the elimination of the use of “majority” and “minority” when discussing race and ethnicity. At FASEB, we have shifted to the use of “historically excluded” to describe individuals from diverse backgrounds as recognition of the biased policies and procedures that have served as barriers to these individuals fully participating in science, technology, engineering, and mathematics.

**5. Guidance is necessary to implement SPD 15 revisions on Federal information.**

FASEB does not have specific feedback for this area.

**6. Comments on Any Additional Topics and Future Research.**

Specifically addressing item 6a – order in which minimum categories should be displayed on Federal information collections – FASEB supports listing minimum categories in alphabetical order to maintain uniformity across collection years.

FASEB commends the Working Group’s efforts to update SPD 15 to be more representative of the diversity seen across the U.S. and appreciates the opportunity to offer our perspectives on several aspects of these proposed updates.

Sincerely,



Kevin C. Kregel, PhD  
FASEB President