



April 12, 2023

Bob Sivinski  
Chair, Interagency Technical Working Group on  
Race and Ethnicity Standards  
Office of Management and Budget  
1650 17th St. NW  
Washington, DC 20500

Re: Feedback on Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards

Dear Mr. Sivinski,

In response to the Federal Register notice 88 FR 5375, and representing the California Health Interview Survey (CHIS), we would like to provide feedback on the Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards. The CHIS is an ongoing, large scale, population health survey for adults, adolescents, and children living in California, with annual sample size of approximately 20,000 adult respondents. Although there are many important perspectives for considering the implications of the proposed changes, this letter focuses on two main issues where our experience conducting the CHIS may be especially relevant: providing some insights into the challenges of the 1997 standards in large-scale population surveys (especially for Hispanic/Latino respondents), and providing some evidence of the impacts of adding write-in responses to race categories like White or Black or African American.

As context, the CHIS in 2021 moved to a similar format for asking race and ethnicity to the format used in the 2020 Census, with write-in responses collected for those answering White or Black or African American on the race question. In addition to collecting Hispanic ethnicity and the high-level race categories, the CHIS also collects information about detailed Hispanic origin, specific tribal heritage, tribal enrollment, specific Asian group, specific Pacific Islander group, whether respondents who selected multiple races identify with any one race in particular, and if yes, which race they identify with most. The CHIS 2021-2023 questions on race and ethnicity are provided in Appendix 1 of this document.

## 1. CHALLENGES FOR LATINO SURVEY RESPONDENTS WITH THE 1997 STANDARDS

CHIS respondents that identify as Hispanic or Latino have demonstrated in multiple ways for many years their difficulty in providing responses to a race question when asked separately after a question about Hispanic origin. Quantitatively, we can compare the ability of Hispanic/Latino or non-Hispanic/Latino respondents to select one of the main response categories on the race question (White, Black or African American, Asian, American Indian or Alaska Native, Pacific Islander, Native Hawaiian) versus needing to rely upon the "Other (Specify: \_\_\_)" response option to try to describe their race. CHIS Respondents who identify as Hispanic/Latino are much more likely to rely upon the "Other (Specify: \_\_\_)" category for the race question (and their write-in response does not match one of the other race categories), or leave the race question blank, per the raw, unweighted data in Table 1 from the 2021 CHIS.

**Table 1: Response Type to the Race Question for CHIS Adult Respondents by Hispanic Origin (Unweighted)**

	Respondents that use “Other (Specify)” or leave race question blank	Respondents that select one of the main race response categories	Percent of row that use “Other (Specify)” or leave race question blank
Respondents who identify as Hispanic or Latino	2,511	4,011	38.5%
Respondents who do not identify as Hispanic or Latino	327	18,498	1.7%

Source: 2021 California Health Interview Survey

When examining the country of birth for the 2,511 CHIS adult respondents who identify as Hispanic or Latino but who used the “Other (Specify)” for the race question, or left the race question blank, the majority were born in the United States, followed by Mexico, followed by Latin American and the Caribbean (see Table 2).

**Table 2: Country of Birth (Grouped by World Bank Region) for Hispanic/Latino CHIS Adult Respondents that Used the Other (Specify) Field for Race or Left the Race Question Blank (Unweighted)**

United States	1,370
Mexico	873
Latin America and the Caribbean	259
...El Salvador	107
...Guatemala	52
...Honduras	22
...Nicaragua	18
...Peru	21
...All other countries in Latin America and the Caribbean	39
East Asia and the Pacific	5
Europe and Central Asia	<5
South Asia	<5
Canada, Middle East and North Africa, and Sub-Saharan Africa	0

Source: 2021 California Health Interview Survey

In addition to these quantitative data, we have other qualitative evidence of the challenges for Hispanic/Latino respondents with the current format of a separate race and Hispanic origin question. Specifically, CHIS program staff conduct regular reviews of recorded telephone interviews with CHIS respondents in English and Spanish. We regularly observe respondents who identify as Hispanic/Latino expressing difficulty to the telephone interviewer when they have answered the question on race after providing an answer to the question on Hispanic/Latino ethnicity. Some examples include:

- Respondents who say they do not understand the race question, and answer again on the race question that they are Hispanic or Latino
- Respondents who interpret the race question to be asking about skin color, and answer with variations like "I am in between White and Black, so brown" or "not White or Black--in the middle"
- Respondents who are not sure how to answer the race question and ask to skip the question
- Respondents who answer White and then provide their Hispanic/Latino origins in the White origins write-in field

Based on the difficulty experienced by Hispanic/Latino respondents in respondent to separate questions on race and ethnicity, we believe the proposal to provide a combined race and ethnicity question will reduce the burden respondents face in providing these data.

We understand that some may have concerns about the impact of a combined race and Hispanic origin question on those who identify as Hispanic/Latino and another race, such as the Afro-Latino community. To provide some insights on this, we have explored CHIS responses to questions on whether respondents with multiple races or ethnicities identify most with one particular race or ethnicity, and if so, which one. The unweighted data in Table 3 provide data from this set of questions for those who identify as Hispanic and Black, Hispanic and White, both alone or in combination with other races.

**Table 3: Response to Identify with Any One Race in Particular for CHIS Adult Respondents that Identify as Black and Hispanic or White and Hispanic (unweighted)**

	Do NOT Identify with Any One Race or Hispanic ethnicity in Particular	Most Identify with.... Black	Most Identify with.... Hispanic	Most Identify with.... Both or All	Most Identify with.... Other Race
Black and Hispanic Only	52.8%	13.9%	18.1%	15.3%	N/A
Black, Hispanic, and at Least One Other Race	60.4%	2.1%	20.8%	10.4%	6.3%
	Do NOT Identify with Any One Race or Hispanic ethnicity in Particular	Most Identify with.... White	Most Identify with.... Hispanic	Most Identify with.... Both or All	Most Identify with.... Other Race
White and Hispanic Only	51.3%	6.8%	36.4%	5.5%	N/A
White, Hispanic, and at Least One Other Race	58.2%	3.6%	24.3%	8.2%	5.7%
	Do NOT Identify with Any One Race or Hispanic ethnicity in Particular	Most Identify with.... "Other (Specify)"	Most Identify with.... Hispanic	Most Identify with.... Both	
Hispanic and "Other (Specify)" Race	73.5%	9.6%	15.1%	1.9%	

Source: 2021 California Health Interview Survey

## 2. IMPACTS OF ADDING WRITE-IN RESPONSES TO WHITE OR BLACK OR AFRICAN AMERICAN

In 2021 the CHIS moved to introduce changes to the race question to add write-in response fields for respondents who select a White or Black or African American response. Based on consultations with staff at the U.S. Census Bureau, we implemented a similar coding schema to that used for the 2020 Census for the first six write-in responses in each field. These codes were then used to create additional identifiers for those who meet the criteria of Middle Eastern or North African (MENA), Black: Caribbean, or Black: Sub-Saharan African. We also implemented a system similar to the Census Bureau in adding additional race or ethnicity categories for a respondent based on their write-in responses to these White or Black or African American fields. For example, if a respondent had answered no to the Hispanic origin question, but wrote "Spanish" or "Mexican" in their White origin write-in field, we

changed their Hispanic origin response from no to yes (more details on this are provided later in Table 5). Additionally, if a respondent had answered only “Black or African American” on the race question, and entered “French” or “Egyptian” in their Black origin write-in field, we would classify them as multi-racial (Black or African American and White) according to the 2020 Census coding rules. It is also important to acknowledge that implementing these additional write-in fields for detailed White and Black or African American origins does require additional resources and effort during data processing to conduct proper coding and classification of these entries.

We believe that more research into the impact of these reclassifications based on write-in responses is needed, and we request more visibility into the impact of this on the 2020 Census and other Federal surveys, especially if the proposed revisions to OMB’s race and ethnicity standards are implemented. In the interest of that transparency, UCLA staff are preparing a presentation for the 2023 AAPOR conference in May describing the impact of the White and Black or African American write-in responses, and we provide some preliminary raw/unweighted 2021 CHIS data from this analysis here.

First, Table 4 summarizes how many respondents who selected White or Black or African American provided a write-in response in the detailed origin field, and how many of those were codable.

**Table 4: Detailed White or Black or African American Origins by CHIS Respondents (unweighted)**

	White Respondents	Black or African American Respondents
Total respondents selecting this race	16,141	1,301
Write-in response provided, and was codable to that race category	12,932 (80.1% of White respondents)	1,061 (81.6% of Black respondents)
Write-in response provided, but was not codable to that race category	1,589 (9.8% of White respondents)	31 (2.4% of Black respondents)
Write-in response not provided	1,620 (10.0% of White respondents)	209 (16.1% of Black respondents)

Source: 2021 California Health Interview Survey

Next, Table 5 summarizes the impact of the White or Black or African American write-in responses on reclassifications of race or Hispanic origin. The most frequent change was changing those with a single detailed Hispanic origin to multiple Hispanic origins, followed by changing single race White respondents to multi-race White and American Indian or Alaska Native, followed by changing non-Hispanic White to Hispanic and White.

**Table 5: Conversions of Race or Ethnicity for CHIS Respondents Based on White or Black or African American Detailed Origin Write-in Responses (unweighted)**

Converted from Single-Origin Hispanic to Multi-Origin Hispanic	567 (566 from White, 1 from Black)
Converted from Non-Hispanic to Hispanic	133 (129 from White, 4 from Black)
Converted from Single Race to Multi-Race...	
...American Indian or Alaska Native added	180 (176 from White, 4 from Black)
...Asian added	7 (6 from White, 1 from Black)
...White added	4 (from Black)
...Black added	4 (from White)
...Native Hawaiian or Pacific Islander added	0

Source: 2021 California Health Interview Survey

In conclusion, the CHIS data on race and ethnicity, which includes primary race identification for multi-racial respondents AND Latino and single race respondents, provide insights on the impact of the decision to move to a single race and ethnicity format for Latinos. Collecting write-in response categories for respondents choosing White

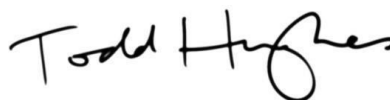
of Black or African American origins, paralleling the Census 2020 format appraises the distribution of the Middle Eastern and North African across these two racial categories.

We do caution that edits to race and ethnicity responses based on additional write-in response categories for detailed White or Black or African American origins may have a substantial impact on race and ethnicity data, notably the increase in the multiracial category, and we recommend that more research and community engagement considering the impact of reclassifications based on coding of write-in responses be completed, especially for transparency of these coding decisions on the 2020 Census and other Federal surveys. Since the CHIS is a health survey with a host of socioeconomic data, future research with CHIS could assess the impact of reclassifications beyond counts and representation to the associative impacts on health and wellbeing of populations. If you have any questions about the contents of this letter, please contact Todd Hughes at [toddhughes@ucla.edu](mailto:toddhughes@ucla.edu).

Sincerely,



Ninez Ponce, Ph.D.  
P.I., California Health Interview Survey



Todd Hughes  
Director, California Health Interview Survey

**APPENDIX 1: CHIS 2021-2023 RACE AND ETHNICITY QUESTIONS**

**'AA4'** [AA4] - Are you Latino or Hispanic?

- 1 Yes
- 2 No

**If = 2, -3, goto 'PN\_AA5A'**

**'AA5'** [AA5] - And what is your Latino or Hispanic ancestry or origin?

*Check all that apply*

- 01 Mexican/Mexican American/Chicano
- 04 Salvadoran
- 05 Guatemalan
- 06 Costa Rican
- 07 Honduran
- 08 Nicaraguan
- 09 Panamanian
- 10 Puerto Rican
- 11 Cuban
- 12 Spanish-American (from Spain)
- 91 Other Latino (Specify: \_\_\_\_\_)

**PROGRAMMING NOTE 'AA5A' :**

**IF 'AA4' = 1 (YES, LATINO/HISPANIC) DISPLAY "You said you are Latino or Hispanic. Also,";**  
**IF MORE THAN ONE RACE GIVEN AFTER ENTERING RESPONSES FOR 'AA5A', CONTINUE WITH**  
**PROGRAMMING NOTE 'AA5B' ;**  
**ELSE FOLLOW SKIPS AS INDICATED FOR SINGLE RESPONSES**

Race

**'AA5A'** [AA5A] - {You said you are Latino or Hispanic. Also,} please tell me which one or more of the following you would use to describe yourself. Would you describe yourself as

- 01 White
- 02 Black or African American
- 03 Asian
- 04 American Indian or Alaska Native
- 05 Pacific Islander
- 06 Native Hawaiian
- 91 Other (Specify: \_\_\_\_\_)

**If 'AA5A'=3, go to 'PN\_AA5E'**

**If 'AA5A'=4, go to 'AA5B'**

**If 'AA5A'=5, go to 'AA5E1'**

**If 'AA5A'=6, go to 'AA5G'**

**If 'AA5A'=1, go to 'AA5H'**

**If 'AA5A'=2, go to 'AA5I'**

**PROGRAMMING NOTE 'AA5H' :**

**IF 'AA5A' = 1 (WHITE), CONTINUE WITH 'AA5H';**  
**ELSE GO TO PROGRAMMING NOTE 'AA5B'**

**'AA5H'** [AA5H]- What are your white origin or origins?

For example, German, Irish, English, Italian, Armenian, Iranian, etc.

- 1 (Specify: \_\_\_\_\_)

**PROGRAMMING NOTE 'AA5I' :**  
**IF 'AA5A' = 2 (BLACK OR AFRICAN AMERICAN), CONTINUE WITH 'AA5I';**  
**ELSE GO TO PROGRAMMING NOTE 'AA5B'**

**'AA5I'** [AA5I]- What are your Black origin or origins?

For example, African American, Nigerian, Ethiopian, Jamaican, Haitian, Ghanaian, etc.

- 1 (Specify: \_\_\_\_\_)

**PROGRAMMING NOTE 'AA5B' :**  
**IF 'AA5A' = 4 (AMERICAN INDIAN OR ALASKA NATIVE), CONTINUE WITH 'AA5B' ;**  
**ELSE GO TO PROGRAMMING NOTE 'AA5E'**

**'AA5B'** [AA5B] - You said, American Indian or Alaska Native, and what is your tribal heritage?

*Check all that apply*

(11 maximum responses)

- 1 Apache
- 2 Blackfoot/Blackfeet
- 3 Cherokee
- 4 Choctaw
- 5 Mexican American Indian
- 6 Navajo
- 7 Pomo
- 8 Pueblo
- 9 Sioux
- 10 Yaqui
- 91 Other tribe (Specify: \_\_\_\_\_)

**'AA5C'** [AA5C] - Are you an enrolled member in a federally or state recognized tribe?

- 1 Yes
- 2 No

**If = 2, -3 goto 'PN\_AA5E'**

**'AA5D'** [AA5D] - Which tribe are you enrolled in?

Apache

- 1 Mescalero Apache, NM
- 2 Apache (not specified)\_
- 3 Other Apache (Specify: \_\_\_\_\_)

Blackfeet

- 4 Blackfoot/Blackfeet

Cherokee

- 5 Western Cherokee
- 6 Cherokee (not specified)
- 7 Other Cherokee (Specify: \_\_\_\_\_)

Choctaw

- 8 Choctaw Oklahoma

- 9 Choctaw (not specified)
- 10 Other Choctaw (Specify: \_\_\_\_\_)
- Navajo
  - 11 Navajo (not specified)
- Pomo
  - 12 Hopland Band, Hopland Rancheria
  - 13 Sherwood Valley Rancheria
  - 14 Pomo (not specified)
  - 15 Other Pomo (SPECIFY: \_\_\_\_\_)
- Pueblo
  - 16 Hopi
  - 17 Ysleta del Sur Pueblo of Texas
  - 18 Pueblo (not specified)
  - 19 Other Pueblo (Specify: \_\_\_\_\_)
- Sioux
  - 20 Oglala/ Pine Ridge Sioux
  - 21 Sioux (not specified)
  - 22 Other Sioux (Specify: \_\_\_\_\_)
- Yaqui
  - 23 Pascua Yaqui Tribe of Arizona
  - 24 Yaqui (not specified)
  - 25 Other Yaqui (Specify: \_\_\_\_\_)
- Other

**91 Other (Specify: \_\_\_\_\_) PROGRAMMING NOTE 'AA5E' :**  
**IF 'AA5A' = 3 (ASIAN) CONTINUE WITH 'AA5E' ;**  
**ELSE GO TO PROGRAMMING NOTE 'AA5E1'**

'AA5E' [AA5E] - You said Asian, and what specific ethnic group are you?

*Check all that apply*

(18 maximum responses)

- 1 Bangladeshi
- 2 Burmese
- 3 Cambodian
- 4 Chinese
- 5 Filipino
- 6 Hmong
- 7 Indian (India)
- 8 Indonesian
- 9 Japanese
- 10 Korean
- 11 Laotian
- 12 Malaysian
- 13 Pakistani
- 14 Sri Lankan
- 15 Taiwanese
- 16 Thai
- 17 Vietnamese
- 91 Other Asian (Specify: \_\_\_\_\_)



**PROGRAMMING NOTE 'AA5E1' :**

**IF 'AA5A' = 5 (OTHER PACIFIC ISLANDER) CONTINUE WITH 'AA5E1' ;  
ELSE GO TO PROGRAMMING NOTE 'AA5G'**

'AA5E1' [AA5E1] - You said you are Pacific Islander. What specific ethnic group are you?

*Check all that apply*

(5 maximum responses)

- 1 Samoan/American Samoan
- 2 Guamanian
- 3 Tongan
- 4 Fijian

**91 Other Pacific Islander (Specify: \_\_\_\_\_) PROGRAMMING NOTE 'AA5G' :**

**IF 'AA4' = 1 (LATINO) AND ['AA5A' = 6 (NATIVE HAWAIIAN) OR 'AA5A' = 5 (OTHER PACIFIC ISLANDER) OR 'AA5A' = 4 (AMERICAN INDIAN OR ALASKA NATIVE) OR 'AA5A' = 3 (ASIAN) OR 'AA5A' = 2 (BLACK/AFRICAN AMERICAN) OR 'AA5A' = 1 (WHITE) OR 'AA5A' = 91 (OTHER)], CONTINUE WITH 'AA5G' ;  
ELSE IF THERE WERE MULTIPLE RESPONSES TO 'AA5A' , 'AA5E' , OR 'AA5E1' [NOT COUNTING -3, CONTINUE WITH 'AA5G' ;  
ELSE SKIP TO 'AH36'**

'AA5G' [AA5G] - You said that you are: {INSERT MULTIPLE RESPONSES FROM 'AA5' , 'AA5A' , 'AA5E' AND 'AA5E1' }.

Do you identify with any one race in particular?

- 1 Yes
- 2 No

**If = 2, -3, goto 'AH36'**

**PROGRAMMING NOTE FOR 'AA5F' :**

**IF 'AA4' = 1 (YES, LATINO) AND 'AA5' ≠ -3, DO NOT DISPLAY 'AA5F' = 14 (LATINO);**

**IF 'AA5A' = 5 (YES, OTHER PACIFIC ISLANDER) AND 'AA5E1' = 1 TO 4 OR 91, DO NOT DISPLAY 'AA5F' = 17 (OTHER PACIFIC ISLANDER);**

**IF 'AA5A' = 3 AND 'AA5E' = 1 TO 17 OR 91, DO NOT DISPLAY 'AA5F' = 19 (ASIAN)**

'AA5F' [AA5F] - Which do you most identify with?

- 1 Mexican/Mexican American/ Chicano
- 4 Salvadoran
- 5 Guatemalan
- 6 Costa Rican
- 7 Honduran
- 8 Nicaraguan
- 9 Panamanian
- 10 Puerto Rican
- 11 Cuban
- 12 Spanish-American (from Spain)
- 13 Latino, Other Specify
- 14 Latino
- 16 Native Hawaiian
- 17 Other Pacific Islander

- 18 American Indian or Alaskan Native
- 19 Asian
- 20 Black or African American
- 21 White
- 22 Race, Other Specify
- 30 Bangladeshi
- 31 Burmese
- 32 Cambodian
- 33 Chinese
- 34 Filipino
- 35 Hmong
- 36 Indian (India)
- 37 Indonesian
- 38 Japanese
- 39 Korean
- 40 Laotian
- 41 Malaysian
- 42 Pakistani
- 43 Sri Lankan
- 44 Taiwanese
- 45 Thai
- 46 Vietnamese
- 49 Asian, Other Specify
- 50 Samoan/ American Samoan
- 51 Guamanian
- 52 Tongan
- 53 Fijian
- 55 Pacific Islander, Other Specify
- 90 Both/All/Multiracial
- 95 None of these
- 97 Other (Specify)