

# Data Collection without Definitions: Problems with OMB Directive 15 and a Proposal

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## Abstract

The Office of Management and Budget’s Statistical Directive No. 15, first issued in 1977 and revised in 1997, sets out minimum standards for the federal government around collecting and reporting data by race and ethnicity. Directive 15 directly promotes comparability and sharing of data across the government and beyond as the standards are adopted voluntarily by other organizations. Despite these benefits, the Directive is regularly the subject of criticism, particularly regarding the definitions it provides for each of the five racial categories and the definition for Hispanic or Latino. In this paper, we propose a novel solution: dispense with the definitions altogether. We describe problems with the definitions, including their circular logic, inconsistency, and lack of comprehensiveness; we describe how they conflate race with related concepts such as ancestry and nationality and inappropriately constrain the identity choices of individuals and groups. Our narrowly tailored proposal, designed for practical implementation, would immediately resolve these problems, increase data comparability across time, and increase flexibility provided by Directive 15.

**Keywords:** race data, demography, identity, federal statistics, Census

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# 1 Introduction

Since at least 1977, the U.S. government has recognized the need for coordinated, federal minimum standards around the collection and reporting of data by race and has promulgated these standards through the Office of Management and Budget’s Statistical Directive No. 15 (OMB, 1978; OMB, 1997). Notwithstanding the numerous benefits from having federally coordinated minimum standards for race data, the definitions provided for each of the racial groups as part of Directive 15 are unworkable, they unnecessarily constrain individual identification options, and they do harm by involving the federal government in the process by which racial hierarchy is legitimated (for symbolic violence, see Swartz, 1997). In this paper, we argue that the official federal government definitions for racial groups are inconsistent, circular, incomplete, and that they inappropriately conflate race with concepts such as geographical origin and nationality.

Fortunately, there is a simple solution: our proposal is to dispense with the definitions altogether. We will show that getting rid of the definitions for each of the racial groups would have little negative consequences, it would resolve the problems of ill-defined racial groups, it would facilitate data collection and analysis by eliminating a source of confusion and inconsistency, and it would get the federal government out of ascribing characteristics to racial groups and racialized individuals. Anticipating counterarguments, we argue that, as a practical matter, our proposal will not endanger data validity, nor comparability across time, nor data interpretability, but rather enhance these qualities. In practice, the definitions are frequently not included in surveys nor do they seem to be considered by most respondents. Thus, there is little to lose and much to gain in eliminating the definitions. If implemented, our proposal would contribute to the federal government and the public’s legitimate interests in monitoring outcomes by race.

Directive 15 specifies a minimum set of five racial categories and two ethnic categories and provides definitions that characterize membership for each group. The five racial categories are, American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. The two ethnic categories are, Hispanic or Latino and Not Hispanic or Latino. Directive 15 provides additional guidance on working with federal race data, for example, it specifies that racial groups be treated as “social-political constructs,” recommends self-identification of race whenever possible, and recommends wording for the race and ethnicity questions. Directive

15 allows for combining the race and Hispanic ethnicity categories into one question. Information on more detailed categories can be collected as long as the data can be aggregated into the main racial groups listed in the Directive. These standards are designed to be used in any federally sponsored data collection or reporting that includes race or ethnicity, general federal program administrative and grant reporting, and civil rights and other compliance reporting.

For an example of inconsistency across the categories and circularity within the definitions, consider the category Black or African American. Table 1 reproduces the full text of the definitions from the 1977 and 1997 versions of Directive 15, along with the proposed changes announced in 2023 under the Biden Administration’s review of the standards. The definition for Black or African American reads in part, “A person having origins in any of the Black racial groups of Africa.” This is the only category that specifies color in the definition. Another common problem is lack of comprehensiveness, which we interpret to mean that some potential respondents do not have at least one category that is appropriate for them. For an example of a problem of this type, consider the “American Indian or Alaska Native” category which, in the 1977 version of Directive 15, did not allow for the possibility of indigenous people from South America. The definition was changed in the 1997 revision to include descendants of “the original peoples of... South America,” but the condition that individuals “maintain[ ] tribal affiliation or community attachment” was added which, because tribal affiliation has specific legal and citizenship implications in the U.S., points to how problems with comprehensiveness were only partially addressed.

This paper does not present a comprehensive plan for revising Directive 15. We argue that one change—removing the racial group definitions—would improve the standards. Our reasoning is not based on the idea that racial group membership is so amorphous or subjective that it inherently presents problems for defining terms or quantifying dimensions of racial hierarchy. Instead, we argue that the current definitions are unworkable and that any similar attempt to define the membership of broad racial groups for uniform use as a minimum standard by the federal government and by industries with significant ties to the federal government (healthcare, education, law enforcement, etc.) is doomed to fail. Our proposal is a specific one that opens up opportunities for better data collection, it is not a call to throw up our hands or to conclude that quantitative data on race is uniquely difficult to work with.

The general problem of collecting information about an individuals’ race is complex. Race is

a multidimensional concept (Roth, 2016). Some of these dimensions are phenotype, self-identity, social identity, and family history, among many others, and any of these dimensions may be geographically and temporally contingent and they may have extensive and intensive margins. The specific problem of designing and implementing federal minimum standards, a part of which we address with our proposal, is of even greater complexity. “Federal” means that the standards need to be designed with both a full appreciation of the country’s diversity and of the diverse needs of hundreds of federal agencies. The standards should be designed considering every conceivable person who may find themselves filling out a U.S. federal government survey. “Minimum” means that the standards need to be designed with all of the complexity of race in mind, while pairing down the guidance to its most succinct and economical form.

This paper’s scope is limited to the definitions included in Directive 15, used by all parts of the federal government whenever race and ethnicity data is collected or presented. Our main contribution is a novel policy recommendation, to eliminate the definitions. Other researchers have critiqued the categories and definitions of Directive 15 (Tamayo Lott, 1997), particularly in the realms of law (Toro, 1995) and health (Wallman et al., 2000). But, there is little academic work proposing practical policy solutions to the problems when they are identified.

Our proposal is unique in considering both the theory of racial categorization and the practical realities of policy change and implementation for Directive 15. For example, Hernández (1998, p. 167) contains a critique of the definitions and an interesting example of how to elicit individual race identity in a survey (“invite[ ] responses about personal identity”), but it is presented as “a vehicle for initiating... discussion... rather than being a concrete model for statistical data collection.” Gimenez (1989) argues that “any standardized terminology” for racial groups “is unavoidably flawed and conducive to the development of racist... analysis of the data thus produced,” but her proposal for a new question only discusses Latinxs. Gimenez’s proposed solution to disaggregate Latinxs into six<sup>1</sup> categories is not qualitatively dissimilar to the current standards and echos many other general calls for data disaggregation or, similarly, abandoning the panethnic category “Hispanic or Latino.” Our proposal is consistent with many different levels of (dis)aggregation and we express no preference here for how many groups or which groups should be present in Directive

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<sup>1</sup>Mexicans, Puerto Ricans, Cubans, Central American refugees, Central American immigrants, and South American immigrants.

15. Our proposal is limited in scope in order to emphasize the practical possibilities for implementation but, as Skerry (2000, p. 43) reminds us, the modesty of our proposal does not imply lack of importance: “The most contentious boundaries that the Census Bureau has to deal with are those concerning race and ethnicity.”

In Section 2, we present an overview of Directive 15’s contents, its policy history, and its reach and enforcement mechanisms. In Section 3, we present our argument that the definitions for the racial groups used in the Directive are inconsistent, circular, incomplete, unhelpfully conflate race with other demographic concepts, and inappropriate insofar as the federal government is, however unintentionally, authoritatively assigning particular racial groups with characteristics that are not accepted by all members of that group. Section 4 contains details of our proposal to dispel with the definitions altogether and Section 5 provides a rationale and discussion of the implications of this change.

## **2 Contents of OMB Directive 15**

Directive 15 (OMB, 1997) prescribes the number and names of five categories for data on race: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Similarly, there are two categories for data on ethnicity: Hispanic or Latino and Not Hispanic or Latino. As of the latest revision, adopted in 1997, the standards require that respondents be able to select more than one racial category. The standards are silent as to whether one may select both ethnic categories. The standards do not preclude collecting data with finer gradations, but any such collection must be done in such a way as to allow the aggregation of individuals into one or more of the five racial categories and one of the two ethnic categories.

In addition to setting the number and names of the minimum categories, Directive 15 defines each of the categories. Table 1 reproduces definitions from the original Directive 15, published in 1977, the standards currently in use revised in 1997, and the proposed changes in OMB (2023). Directive 15 states that the definitions are provided for the purposes of “Federal statistics, program administrative reporting, and civil rights compliance reporting” (OMB, 1997, p. 558789), but there is no explanation provided to indicate under what circumstances the definitions themselves are to be used. For example, it is not clear whether the definitions should be provided to survey respondents.

To our knowledge, no major national surveys provide the definitions from Directive 15 alongside the questions on race and ethnicity. On the rare occasions that the definitions do appear outside of direct commentary on Directive 15, they are reproduced as supplemental background information and, more often, provided alongside reported statistics rather than in connection with the survey instrument. In these cases, the data is aggregated from surveys that asked more detailed questions on race and so the definitions were likely not used in data collection, raising questions about the appropriateness of applying the definitions.

Directive 15 provides additional guidance around the nature of race, different question formats, and which body is authorized to provide exceptions to the standards. The standards state that: (a) the categories are “social-political constructs” that “should not be interpreted as being scientific or anthropological in nature” (OMB, 1997, p. 58788), (b) the categories “are not to be used as determinants of eligibility for participation in any Federal program” (OMB, 1997, p. 58788), (c) the data may be collected in a two-question format with five racial groups and two ethnic groups or in a one-question format with a minimum of six categories given as, American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, and White, (d) when presenting aggregated data, the number of respondents who indicated only one category should be tabulated separately and, in the one-question format, the number of individuals who marked “Hispanic or Latino and one or more races” should be reported separately (OMB, 1997, p. 58789), and (e) any deviation from the standards requires specific authorization by the Office of Management and Budget.

## **2.1 Policy history**

Statistical Directive 15 was first issued in 1977 and arose in response to the growing need for data on race and ethnicity for civil rights monitoring and enforcement (Federal Interagency Committee on Education, 1975). Agencies within the federal government collect data as part of their mission or due to legal mandates (e.g. both the Civil Rights Act of 1964 and the Voting Rights Act of 1973 require specific agencies to collect data on race and ethnicity). The 1977 standards created a new scheme for collecting racial data that required at minimum four categories or the ability to aggregate more detailed data into the four broad categories, which were, American Indian or Alaska Native, Asian or Pacific Islander, Black, and White.

The initial Directive 15 also implemented Public Law 94-311 of 1976, which requires the federal government to collect information to make Hispanics as a group identifiable in the nation's statistical reports (94th Congress, 1976). This mandate led to a two-part question whereby respondents are asked to identify as Hispanic or non-Hispanic in one question and asked to identify their race in a second question. Public Law 94-311 was proposed and passed through the efforts of U.S. House of Representatives Edward Roybal and the newly formed Congressional Hispanic Caucus (Robbin, 2000). An interagency process was used to formulate Directive 15.

The process of updating and revising Directive 15 began in 1993 (Citro, 1997). Official reports and statements from government officials frequently cite the need to “reflect[ ] the increasing diversity of our Nation's population that has resulted primarily from growth in immigration and interracial marriages” (Wallman, 1998, p. 31). The original 1977 and the revised 1997 versions of Directive 15 both represent the outcome of intergroup and intragroup cooperation and competition, a complex interagency process, and numerous compromises with uneven representation of expertise. For example, there was almost no involvement of community or political representatives or experts in American Indian affairs in the original Directive 15 (Forbes, 1992). The new formulation's main changes included: (1) splitting the “Asian or Pacific Islander” group into “Asian” and “Native Hawaiian or Other Pacific Islander,” thus establishing five racial categories as opposed to four, (2) allowing for individuals to select (or be assigned) more than one racial group, (3) including indigenous peoples from South and Central America in the Native Americans category, and (4) changes to the category names and definitions of the other groups, such as changing the list of country examples in the Asian group and adding reference to the term Latino in the Hispanic or Latino ethnic category. As with Public Law 94-311, the separation of Native Hawaiians from Asians and from Native Americans was in part achieved through the advocacy of a particular congressman, Senator Daniel Akaka of Hawaii.

The U.S. Census Bureau is subject to Directive 15 and so the 2000 census operated under the then three-year-old, revised Directive 15 with one high profile exception that allows us to illustrate how the standards work in practice. The standards allow for significant flexibility, including allowing selecting more than one category and including any number of detailed categories for race and ethnicity, so long as aggregation up to the broad Directive 15 categories is possible. The U.S. Census Bureau requested and was granted an exemption in order to add a sixth category, “Some

other race.”<sup>2</sup> This category is problematic under Directive 15 because those indicating “Some other race” with no other racial category cannot be aggregated into one or even multiple of the five official racial categories. In the 2000 Census, 97 percent of those who indicated Some other race also identified as Hispanic or Latino. Although largely beyond the scope of this paper, we note that the U.S. Census has spent the past 35 years struggling to collect race data on Hispanics. As U.S. Census officials Martin et al. (1990, p. 551) articulate, the Bureau has as an explicit goal “to reduce reporting of ‘Other race’ by Hispanics in the race item.”

As of this writing, Directive 15 is currently undergoing review for only the second time in nearly 50 years. Statistical standards like the Directive are designed and intended to last. Data is generally more comparable over time if statistical standards do not change significantly. It seems clear, though, that part of the reason why the standards are changed so infrequently, despite the well recognized problems with the definitions, is the costliness and contentiousness of the revision process. The current revision process is led by the Federal Interagency Technical Working Group on Race and Ethnicity Standards, a combination of the 13 Principle Statistical Agencies and along with 25 additional agencies selected for their reliance on race and ethnicity data (Office of Management and Budget, 2023). In recent years, the most contentious issues involve (a) allowing an explicit “Multiracial” category to “directly promote a distinct multiracial identity” (Hernández, 1998, p. 100), (b) combining the race and ethnicity question, which reverses decades long messaging that Hispanics are not a race but a panethnic category incorporating people of any race, (c) the accurate counting on Native populations, including Native Hawaiians, and (d) the possible creation of a Middle East and North Africa (MENA) category which would encompass individuals currently instructed to identify as white, as per the definitions (see Table 1 ).

The revision process is not narrowly defined. In particular, there is increasing focus on reflecting the nation’s “diversity,” though diversity of what is not well defined. For example, there is a focus on ethnic or cultural identities that is not explicitly tied to the original purposes of civil rights monitoring or other of Directive 15’s original purposes discussed below. This is significant not because these topics are not important in many contexts, but that they may not be appropriate for the purposes of a minimum standard for all data collection undertaken by the federal government and others who might adopt the same standards.

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<sup>2</sup>The residual category “Other” has been in use by the Census since 1910.

## 2.2 Purpose, reach, and enforcement

The federal minimum standards around race and ethnicity, Directive 15, provide a number of benefits. They help to encourage similar practices around data across the federal government and related bodies, which facilitates sharing and comparing data and reading across official statistical reports. The standards contribute to government functioning through increased efficiency: while each department and agency is charged with planning and executing its own strategies around data, the guidance, particularly around a contentious and contested issue, reduces duplication of efforts. The standards do not preclude data collection that goes beyond the Directive 15 racial and ethnic categories in more detail nor are does it limit approaches to studying racial and ethnic inequality to multiple choice surveys. Agencies are free to experiment or to pursue research that is based on qualitative approaches or alternative quantitative methodologies; Directive 15 is intended to provide minimum standards for regular agency functions.

In light of our argument, it is useful to review the sweeping reach of Directive 15. Both the original and the revised Directive 15 contain language about its intended use (quoting from the 1977 version): the minimum categories are to be used “by all agencies. . . for civil rights compliance reporting and equal employment reporting for both the public and private sectors and for all levels of government” and for all “federally sponsored statistical data collection where race and/or ethnicity is required” (OMB, 1978).

Whether intended or not, comprehensive use of these standards by the federal government influence the operations of organizations and institutions with significant contact with the federal government, including through regulatory or procurement relationships, such as law enforcement and legal professions, healthcare, and higher education. OMB recognizes this in official communication: “Even where it is not required, Directive No. 15 standards are often used in State and business record systems and by markers as a matter of convenience and to facilitate comparisons with other data sets” (OMB, 1995, p. 44676). The far-reaching nature of Directive 15 is a key consideration for any proposed changes: “Any changes in Directive No. 15 will be imposed on tens of thousands of State and local agencies such as law enforcement agencies (through the Uniform Crime Reporting system), school districts, the business community, and others required to use the Directive in reporting these data to the Federal government” (OMB, 1995, p. 44680). In Section

5, we will argue that removing the definitions would not have negative consequences even when taking an expansive view of its reach and influence.

Part of the reason that our proposal would not be disruptive has to do with which aspects of Directive 15 are most influential on practices within the agencies, institutions, and organizations discussed above. The influence of Directive 15 is most directly seen in terms of which racial and ethnic categories are available in surveys. The current standards require that individuals can be aggregated into five specific race categories and two specific ethnic categories. Surveys that are in compliance with Directive 15 provide these categories or they provide additional options that are clear subcategories. There is little evidence that the definitions provided in Directive 15 are used in practice as they are rarely cited or reproduced and almost never included in surveys for respondents to refer to as they make their selections.

The process of updating Directive 15, culminating in the 1997 revised standards, required setting forth Principles to guide the revision process. There were 12 principles, including “Respect for individual dignity” (OMB, 1994). Interestingly, the Principles, originally published in 1994, were reissued in 1995 with small changes that reveal some of the thinking or intended purpose of Directive 15. For example, the later version reproduces Principle 5, “Foremost consideration should be given to data aggregations by race and ethnicity that are useful for statistical analysis, program administration and assessment, and enforcement of existing laws and judicial decisions,” but removes the reference to, “enforcement of existing laws and judicial decisions.” Similar changes were made to limit the scope of Principle 6, “While Federal data needs for racial and ethnic data are of primary importance, consideration should also be given to needs at the State and local government levels, including American Indian tribal and Alaska Native village governments,” which was edited to more clearly subordinate non-federal data needs.

Directive 15 has a far reach, both explicitly intended and in practical effect. Any critique of our proposal or of Directive 15 more generally should be clear that the purpose of Directive 15 is not to define racial groups for individuals nor to provide guidance for researchers doing research on race outside federal government surveys, administrative forms, and reports. The question of federal minimum standards for data collection and reporting on race is different from related questions about the best way to capture data on race in a given context because this does not recognize the specific federal application of Directive 15. The problem at issue in this paper is even different

from questions about how the U.S. government should ideally or even normally collect data on race because this does not recognize that Directive 15 specifies *minimum standards*. The problem of designing Directive 15—and we only address the definitions in this paper—is overdetermined. As is acknowledged in the text setting out the revision principles, “The agencies recognize that these principles may in some cases represent competing goals for the standard. . . . Through the review process, it will be necessary to balance statistical issues, needs for data, and social concerns” (OMB, 1994, p. 29834). In Section 5 we discuss how our proposal would bring Directive 15 closer to fulfilling multiple of the revision principles currently in discussion, with little to no down side in terms of the other principles.

Policy guidance outside of Directive 15 significantly affects how the standards function in practice. For example, an OMB Bulletin from March 2000 states that “Responses that combine one minority race and white are allocated to the minority race” (Lew, 2000). That is, statistical practices arguably consistent with Directive 15 can follow rules of hypodescent in which whiteness is treated as “pure” and that children with both white and non-white parents are assigned their non-white parent’s race. This is significant in a number of ways (Myers Jr., 1997), but for our purposes the key point is this: the definitions provided in the text of Directive 15 are not the only, or even the most important, way in which the federal government provides guidance about how to work with data on race. In other instances of recoding, the Census has at times coded anyone who indicates Hispanic as “some other race” (Schuster, 2021) and has recoded individuals as Native American when they include a write-in category recognized as a native group (e.g. Cherokee) even when the survey respondent did not check the box for Native American (Eschbach & Taylor, forthcoming). In other words, Directive 15 is not the last and only word in understanding what race terms mean, they are defined implicitly by practices such as the rule of hypodescent. This means that removing the definitions has the potential to end the problems associated with them while attempting to amend them may lead to unanticipated effects.

There is no clear enforcement mechanism for Directive 15. In our research, we found no evidence of active enforcement efforts. The Directive does not specify when race and ethnicity data should be collected, it merely establishes minimum standards. It specifies the category names and definitions, but does not provide any explanation regarding how the definitions are to be used. The result is that Directive 15 is effective at promoting a minimum of data comparability and collaboration

between agencies, but it does not guarantee data on race and ethnicity is easily comparable across federal statistical agencies. In one study, the data is not comparable across states or even within a state across different survey modalities. The State Health Access Data Assistance Center at the University of Minnesota (2021) found large discrepancies between states and within states between online and paper versions of enrollment forms for Medicaid applications. Of the states in their sample, 14 states offered more racial category options online, 9 states offered more on the paper version, and 10 states offered the same number on both forms.

### **3 Problems with the federal government’s definitions**

In this section, we identify the major problems with the definitions for racial groups as they are written in the current, 1997 vintage Directive 15. The problems we raise here are not new to the literature; many have been advanced as critiques of racial classification schemes without reference to Directive 15, others have been levied against Directive 15 in the academic literature, and many have been written about in official government reports as part of the Directive 15 revision processes. Our argument is unique because we focus only on the specific aspect of official federal government definitions for racial groups as part of a set of minimum standards for statistical practices, with attention to a practical solution that could feasibly be implemented. As part of the 1997 revision process, the U.S. government acknowledged that “the categories in Directive No. 15 confuse some respondents because they are inconsistent, too broad for some purposes, and the concepts of race, Hispanic origin, and ancestry overlap” (OMB, 1995, p. 44677). Despite this acknowledgment, Table 1 shows that only a small number of changes were made and many of the problems remain; the limitations emphasized by government officials during the early stages of the revision process were rarely the focus of attention of government reports close to or during the phase-in of the new Directive 15.

The original categories from the 1977 Directive 15, and largely unchanged in the revision, may have been presented with reference to a great deal of research and administrative jargon, but they conform to the by-then anthropologically discredited idea of “the ethno-racial pentagon” (Hollinger, 2000). Under different names, the five categories would be familiar to educated Americans of the 19th century: white (European), black (African), red (Native American), brown (South American

and possibly South Asian), and yellow (East Asian). Efforts to craft definitions for these specific categories that (a) fulfill the purposes of Directive 15, and (b) provide sufficient uniformity for their countless federal applications does not seem possible, but (c) capture the real-world asymmetries in how racial groups function, and (d) respect individual and group identity choice seems impossible. Here, we discuss problems with the current definitions.

### 3.1 Inconsistent, circular, and not comprehensive definitions

The definitions provided in Directive 15 are inconsistent, not comprehensive, and, in some cases, weak due to circular logic. Consider the circularity of the definition of the category “Black or African American”: “A person having origins in any of the Black racial groups of Africa.” No independent definition of what it means to be black is offered. Anyone who has origins in a non-black racial group of Africa is presumed to have origins in some other continent or place; the definitions are silent about any racial groups in Africa other than “Black racial groups.”

Unlike most of the other racial groups in the classification scheme,<sup>3</sup> the inclusion of the phrase “any of the Black racial groups” shifts this racial category from being exclusively based upon geographic origin (see Table 1 ). Oddly enough, the definition of white does not include the qualifier that individuals with ancestry in “Europe, the Middle East, or North Africa” must have “origins in any of the white racial groups.” But even if parallelism were achieved, this does not mean that the effect would be the same. Some blacks who have been in the United States for generations have no record of where in Africa their ancestors were born and do not wish to be called “African Americans.” Historically, African Americans as a group have been subject to campaigns intended to suppress African culture and Afrocentric identities and to devalue links with Africa. In short, there are a number of reasons why many blacks in the US would want to emphasize a connection with Africa or not to. Removing the problematic definition would not preclude any self- and group-identification choices but would beneficially eliminate the symbolic imposition of a unified definition through federal statistics.

The critiques we discuss in this section, including the first critique about the circularity of the definition for Black or African American, should not be taken to mean that Directive 15 can be

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<sup>3</sup>The American Indian or Alaska Native category is the other exception, with reference to “tribal affiliation or community attachment.”

fixed or edited to solve the identified problems. Given its wide-ranging intended purpose, there is no set of definitions that would not be subject to many of the critiques we raise. By a different token, our critique should not be taken to mean that it is futile to expect sensible, workable definitions of race for public policy purposes. We have written extensively in favor of a race-conscious policy, reparations for U.S. descendants of enslaved people, and we have detailed the identity and ancestry requirements that could accompany such a policy (Darity & Mullen, 2020). The OMB has stated, “In line with the subjective nature of the concept, research shows people change how they classify themselves with respect to race and ethnicity” over time (OMB, 1995, p. 44677), but this is not exactly right. Race is a multidimensional concept and some dimensions are more “subjective” than others; certainly, group-based phenomena such as the realities of race-based slavery and its aftermath are not “subjective.” Once again, the intended purpose of Directive 15 and its reach in practice is what sets it apart. It is intended to provide minimum standards but it functions as the authoritative, federally sanctioned arbiter of the boundaries and characteristics of racial groups. The definitions are not necessary for Directive 15 to fulfill its intended functions.

Interestingly, there is a new type of circularity in the definitions that was not present for the original Directive 15 that arises because the standards are nearly five decades old. The goal of the category names and definitions is to reflect social practice, to give people options that are close to how they might identify if given an open-ended response, but social practice itself has been shaped by Directive 15. Revisions to Directive 15 must account for changes over time in the social meaning of racial groups while preserving data comparability over time. Because Directive 15 has shaped how people think of themselves, the categories and their associated meanings (if not the precise definitions) take on a legitimacy and authority that functionally limits change over time, like a ship slowed by a dragging anchor that is the flawed 1977 categories and definitions. Take the Hispanic group, for example. For many today, it would be sensible to refer to Brazilians as Latinos/Latinas/Latinxs (Margolis, 1995). Part of the reluctance to change the definition may be due to the reification of Hispanic as a language minority that arose from a particular political climate but which became reified through the administrative practices of the U.S. government (Fears, 2003).

The categories are also not complete. Where does one situate individuals racially whose ancestors are Australian aborigines or New Zealand Maoris or any of the more than 40 indigenous Arctic

communities (Walter, 2013)? Given that much of the list is organized by countries, what specific countries constitute North Africa for the purposes of distinguishing white from Black or African American individuals? Is the concept of “Black racial groups of Africa” a widely accepted social construct from the perspective of Africans who may find themselves in the U.S. and filling out a survey? The definitions are based on the false premise that a particular set of racial meanings, however mainstream they may be in the U.S., is appropriate for application through the federal government’s minimum standards for race and ethnicity statistics. Although the revision process involves dozens of agencies, costly survey instrument testing, focus groups, and contentious consultations, anyone with access to a map and an internet search browser can find problems with comprehensiveness of the definitions.

The categories are also incomplete when it comes to accounting for racialization as Chicano/Chicana/Chicanx (Toro, 1995; Martinez, 1997) or, variously, brown or Latino/Latina/Latinx. Sociological evidence shows that many Latinxs think of themselves as *racially* Latino (Hitlin et al., 2007), and for good reason. There are histories of racial epithets, racially discriminatory policies and practices, lynchings (Mirandé, 2019), discrimination in all parts of economic life, and extrajudicial killings (Shadowen, 2018) that extend to today. Some Latinxs are racialized as “slightly tan, with dark hair and eyes” in media (see Rodriguez (1997) for a book-length, nuanced treatment of the visual language around Latinidad), and there is a two-way racialization looking Latinx and specific linguistic practices such as speaking Spanish or Spanish-accented English (Rosa, 2019). And yet, not all Latinxs are racialized as “brown” and collapsing Latinidad into a single-race group privileges the interests of white Latinxs. A specific proposal for collecting race information on Latinidad must confront the highly successful campaign, of which the 1977 Directive 15 was a major part, to create a new social panethnicity called “Hispanic” (Mora, 2014). Such a proposal is beyond the scope of the current paper. The significance of this issue for our proposal is to emphasize problems with the current definitions and to recognize that various ways of better collecting information on Latinxs’ racialization would be consistent with removing definitions from Directive 15. For example, it would be possible to describe (read: define) race as a socio-political concept on surveys and within the Directive while asking questions about identity or what López & Hogan (2021, p. 1) term “street-race,” the typical category others assign you to “if you were walking down the street.” Their proposed survey question includes the category “brown” as an option but does

not provide definitions for the individual categories.

The definitions are also clearly inconsistent across racial groups, for which we provide three examples. First, skin color is only referenced for the Black or African American group. This group is also the only racial category that does not contain the phrase “any of the original peoples of” in reference to a geographical origin which, given the diversity and intensity of centuries-old colonial projects in Africa, may reflect an intentional omission to deemphasize African’s claims to particular land and resources. Second, the category American Indian or Alaska Native is the only category that requires specific cultural and political practices (“maintains tribal affiliation or community attachment”), though there are proposals to remove this phrase in the on-going revision. The added burden to identification included for American Indian or Alaska Natives in Directive 15 functionally to reduce the size of this group, consistent with the project of settler colonialism.<sup>4</sup> Again, we do not argue that the qualification “maintains tribal affiliation or community attachment” is never appropriate or that removing that qualification by itself would improve the definitions. Our argument is that the definitions are flawed and unnecessary for achieving Directive 15’s intended purpose. The last and most humorous of the inconsistencies is the typographical error wherein Cubans appear twice in the definition of Hispanic or Latino.

Though we argue that the definitions are inconsistent, we recognize that hierarchy and unequal power is inherent in characterizing racial groups in all societies in which they have been studied. The way race functions in the U.S. today and since European colonization of North America has been to create hierarchies and the basic definitions of who is white, Black, non-white or non-Black do not operate symmetrically. This operates at every level, including the social rules that characterize membership in racial groups. Fields (1982, p. 149) writes, there is “a well-known anomaly of American racial convention that considers a white woman capable of giving birth to a black child but denies that a black woman can give birth to a white child.” The current definitions clearly attempt parallelism, and in so doing naturalize racial groups, but it is not clear that the solution is to attempt to fashion better definitions.

The problem is not simply that the definitions are inconsistent, but that they are so without reason or for reasons that support or obscure racial injustice. Reference to the “Black racial groups

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<sup>4</sup>Forbes (1992, p. 63) writes, “one reason for the directive’s treatment of Native Americans was to reduce the numbers of persons qualifying for federal services as Indians.”

of Africa” with no similar reference to the “White racial groups of Europe” in the white category definition does not conform to any well-known or broadly accepted socio-political understanding of race that we know of. The process of collecting survey information can create the appearance of similarity or parallelism that does not exist. Each individual may have one or more racial identities in the U.S., but race is not only or not even primarily an individual characteristic. Rather, it is a socio-political, economic, and ideological phenomenon that has evolved over time and with geospatial variation, it is not primarily based on having “origins” in geographically defined population groups. Racial groups have specific histories, such as the relationship between whites and blacks during and in the wake of chattel capitalism or the relationship between whites and American Indians during and in the wake of attempted genocide. The historical and hierarchical characteristics of race as a social group phenomenon mean that creating a comprehensive list of definitions for individual membership is besides the point; definitions are not necessary to ensure meaningful data collection or any of the other goals of Directive 15.

The definitions in Directive 15 are related to another inconsistency regarding the legal meanings and implications of race for U.S. jurisprudence. An individual’s race has had important legal significance in the country’s past, determining whether one was considered property or capable of owning other humans, but even today an individual’s race is central for anti-discrimination case law and the use of explicitly or implicitly racialized processes by institutions has implications for equal opportunity, affirmative action, and anti-discrimination law (Desautels-Stein, 2012). The law typically considers a number of criteria when seeking to understand an individual’s race, including “physical characteristics, documentary evidence, community perception, and expressive self-identification” (Yang, 2005, p. 406). In anti-discrimination cases, the perception of an individual is the critical factor and the truth of an individual’s heritage or other characteristics is largely irrelevant. In other words, the federal government on the one hand defines membership in racial groups narrowly and specifically based on whether an individual “has origins in any of the original peoples” of various geographically defined regions (with notable exceptions that we have discussed), but for the purposes of applying the nation’s laws, a variety of other standards are used (Ford, 1994). The distinction is not just that the law is more nuanced, which would be an expected difference between the use of a concept in a civil or criminal case law as opposed to questions on an survey or administrative form. Instead, the concepts contained in the Directive 15 definitions carry almost no weight legally and,

conversely, very little of the socio-political definition of race is captured by largely geographically based category definitions.

### **3.2 Conflating race with related concepts**

The definitions provided in Directive 15 unhelpfully conflate race with related concepts including geographical origin by region (usually continents), nationality, ancestry, tribal affiliation, and ethnic identity. Reading the definitions, one is struck by a repeated use of the phrase, “A person having origins in any of the original peoples of . . .,” which appears in four out of the five racial category definitions. But what does it mean for a person to “have origins” in a “peoples?” What constitutes “original peoples” of a broad geographical area? These concepts should be abandoned as inaccurate, misleading, and confused. For one, a power law is operative when accounting for generations in human lineages. Assuming each individual has two parents and counting back by generations we obtain 4 grandparents, 8 great-grandparents, then 16, 32, 64, 128. Going back to the year 1619, approximately 13 generations ago, we would be tracking the “origins” (not the location!) of 8,192 individuals. Taken literally, this is unworkable. It is also not how people think about their racial identity.

Although the original framing of Directive 15 and the 1997 revision insist that race is a socio-political concept, the definitions do not reflect this. The definitions in Directive 15 are ahistorical in two ways: (1) they do not allow for a changing meaning of race but rather aim to have fixed geographical referent and (2) they do not conform to the historical and contemporary ways in which race operates. The definitions support the myth of a biological (consanguine) construction of race. The definitions draw on historically and anthropologically inaccurate assumptions about different racial groups having discrete origins in fixed geographical areas. This is not only wrong, it naturalizes and reifies particular relationships between individual members. Again, definitions are not necessary. Each of our critiques taken individually seem to suggest the possibility of an alternative definition that is not subject to the critique. For example, in this case we could rewrite the definitions to remove or deemphasize references to original peoples from various continents. But, taken together, the critiques imply that it is not possible to generate usable, practical definitions for the intended purposes of Directive 15, much less move these forward given the political and administrative realities that are documented, at least for other proposed changes, in the record

of the 1977 drafting and the 197 revision. The fact that the standards were written originally and revised with many of these problems acknowledged indicates that the political process of achieving consensus between different constituencies and stakeholders within the federal government is difficult, costly, and always results in compromise.

The problem of mixing concepts of race with geographical regions is apparent in the contentious and, as yet, unresolved issue of adding a separate Middle East and North Africa (MENA) designation. Under the current definitions, individuals “having origins in any of the original peoples of . . . the Middle East[ ] or North Africa” are classified as white. There is no agreement about the boundaries for this region. The lack of disagreement is found among international bodies, between different official publications of the U.S. government, and among individuals who self-identify as MENA. For our purposes, it is not necessary to rehearse the historically fraught project of defining boundaries and characterizing the Middle East and North Africa from global north spaces. What is clear is that even if we were to resolve what countries constitute the Middle East and North Africa it would still not make sense to offer this as a racial category for the purposes of Directive 15 because racialization is not primarily about the geographical origin.

Discussions around adding a MENA category, perhaps alongside others that allows respondents to check Black or White in addition to MENA, reveal a similar dynamic as the Hispanic group. People are racialized as Arab/Muslim or as Hispanic/Mexican/Latino based on phenotype, cultural markets, and local context, but the categories do not allow for individuals to indicate this, instead focusing on having “origins” in the “original peoples” of various ambiguously defined geographical regions. The definitions work against an understanding of race as anything but related to the geographical origin of one’s ancestors.

In addition to naturalizing the idea of racial groups originating in discrete continents (Africa, Europe, North and South America), the definitions and discussions around the revision process seem to take for granted that individuals from the same country share the same race. Or, incorporating the implied logic of the phrase “original peoples,” that if we go back far enough all the peoples in a given country’s territory would be categorized under the same race today. This is a fiction. It is zombie anthropology: disavowed by anthropologists today but difficult to extricate from our culture and administrative practices (Fuentes et al., 2019). There are many examples that illustrate the wrongness of this framework. Take the Philippine islands, categorized under Asia by Directive 15,

but where the earliest known evidence of human habitation were people from Africa, the ancestors of various (typically) dark-skinned, contemporary Filipino ethnic groups (Larena et al., 2021). To state the obvious, the original peoples of Europe came from Africa because homo sapiens first evolved in what we call present-day Africa. Their skin did not lighten upon crossing into Europe 50,000 years ago. Modern evidence shows that skin lightened much later than previously thought, perhaps as soon as 8 thousand years ago (Mathieson et al., 2015).

To be clear, what makes the Directive 15 definitions wrong is not just that they are built on debunked science, but that they function to naturalize a social phenomenon. Critical black thought in the U.S. has, since the start of racial domination (Robinson & Kelley, 2000), recognized that what separates whites from blacks in the US is not “having origins in the original peoples of” different regions, but group-based differences in power. Racism is invented, maintained, challenged, and circumvented in a historical struggle. Racism endures because it accomplishes instrumental aims, namely, material and psychological benefits to members of the dominant group at the expense of members of the marginalized group (Mason, 2023). Racial groups do not need to be “defined” for this system to operate and challenging group borders can be an effective strategy towards anti-racism. Toro (1995, p. 1244) articulates a widely accepted view in the social sciences, but applies it specifically to Directive 15, writing:

The drafters of Directive No. 15 did not attend to this crucial distinction between the fiction of race and the reality of racism. Instead, they assumed that a person can be said to belong to a race, and that racism occurs when someone falsely attributes other characteristics to a person that are dependent on the physical, racial appearance of that person.

Efforts to denaturalize racial difference interrupt the operation of symbolic violence (Swartz, 1997), the process by which social group-based inequality is justified and becomes part of dominant, hegemonic understandings of the world.

### **3.3 Inappropriately constraining identity**

Directive 15 has taken on a life of its own, beyond the scope of its intended purpose. The administrative practices of the nation-state influence peoples’ identities and the realities of group-based

inequality. Initially designed to collect data, Directive 15 has significantly shaped how Americans view themselves, and so now as we contemplate updates the original structure of it has been normalized. From an Indigenous positionality, Walter (2013, p. 8) writes, “As we invest ourselves and our communities in their categories, we increasingly use statistics to help us tell *ourselves* who we are.” Or, as Bourdieu (2009, p. 224) writes, “objectivist arbitration... can give rise in reality, by specific effectiveness of evocation, to the very thing they represent.” The categories and definitions in Directive 15 are meant to reflect social reality, but their unintended (or at least unstated) effect is to shape social reality. To the extent that the definitions reflect dominant ideas about race, they may shape social reality in ways that maintain or deepen racial hierarchies rather than challenge them. The current definitions ascribe particular characteristics that may not be embraced by all members of the group and leave out characteristics that some members would find indispensable to their understanding of their identity. These distortions need to be balanced with the potential benefits that can come from federal government sponsored data collection. And this balance can be better achieved by providing category names without definitions.

There are many examples of this inappropriate constraining of identity choices that would not be present absent the definitions. Persons choosing the black category, particularly if they are descendants of persons enslaved in the United States, may self-identify as black without being able to identify an African country of origin, nor necessarily wanting to do so. With regards to ethnic identification, these individuals may see themselves as descendants of American Freedmen, in contrast with a smaller share of the self-reported black population comprised of more recent immigrants to the United States or the much smaller share who are descendants of the American Indian Freedmen (emancipated from the “Five Civilized Tribes”). Only the second group may possess a primary sense of origin in and identification with countries in Africa or Africa writ large.

Under the current system, anyone with any known white ancestry should identify as white. People routinely ignore this, which is both a reflection of historical hypodecendency but also a personal choice to identify with a different community. These choices can be strategic, reflecting individual utility maximization (Darity et al., 2006), or they may be ethical decisions. In either case, including the definitions in Directive 15 needlessly puts constraints on the effectiveness of identification choices: individuals are free to believe what they like under the current standards, but limited in their ability to express carefully considered positions for the purposes of government

and non-government statistics that are influenced by the Directive.

Another example of this inappropriate constraining of choice is found in the definition for the Hispanic or Latino ethnic designation. The proximate cause for an ethnicity question in Directive 15 is clear: Public Law 94-311 required the federal government to capture information on “Spanish origin” language minority. Today, defining Latinidad in the U.S., a former colony and current colonial power, through reference to ties to another colonial power, Spain, is not something that all Latinxs embrace (Rosa & Flores, 2017). Public Law 94-311 was part of a flurry of activity following the 1964 Civil Rights Act. Seeing the recent legislative successes of the black community, various Latino groups interested in consolidating power realized that by joining the Mexican American community of the west and southwest, the Puerto Rican community in New York, and the Cuban American community in South Florida, their numbers could be compared to that of African Americans. The outcome of these efforts is a reified understanding of Latinos in the U.S.

The language-minority designation was used, both immediately and increasingly over time, as a racial designation to capture the real-world racialization of some Latinxs (and, depending on phenotype or last name, some non-Latinxs) as brown/Mexican/Chicano/Latino. The logics of how race operates are not reflected in Directive 15. For example, someone with two parents, one phenotypically white Latinx and the other black Jamaican, may be phenotypically brown and Latina but not brown *because* she is Latina (unless Jamaican Americans are considered Latinx).<sup>5</sup> Not everyone from Latin America is racialized as brown in the U.S. (they are also white, black, afro-Latinx, indigenous, mestizo, among many other possibilities) and not everyone from Latin America speaks Spanish (they speak French, English, Portuguese, Quechua, Maya, among other languages). Any efforts to amend the federal minimum standards to improve data vis-a-vis the racialization of Hispanics or Latinos—combining questions, creating new categories, etc.—should not repeat the mistake of earlier versions of Directive 15 and thus should not seek attach identity-constraining definitions to particular categories.

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<sup>5</sup>This is not a contrived example. ne of the authors is describing their niece.

## 4 Proposal to discontinue defining racial groups in Directive 15

As a solution to the many problems detailed in the previous section, we propose removing the definitions from Directive 15. The benefits of federal minimum standards for the collection and reporting of data on race and ethnicity are substantial. Our proposal for deleting the definitions is compatible with many different revisions of the Directive, it will better enable Directive 15 to achieve its intended aims. In many cases, our proposal would not result in any change in actual practice because the definitions are rarely used explicitly, but it does represent a profound symbolic change and it resolves contradictions in how the policy works in practice.

Under our proposal, the federal government would set out a minimum set of categories and provide other guidance around data collection and reporting. Individuals might be asked if they identify as or are part of one of the groups, say, white, but this term would not be defined. In practice, surveys rarely provide the definitions from Directive 15, so this would imply little change in most cases. Asking individuals to identify with categories while not providing a definition is common practice. This is typically how questions around gender are asked. As with race, there are many different ways to solicit this information and the number and meaning of categories can vary from survey to survey.

The number of categories and which specific ones to include is a key matter of debate in revising the standards. The original 1977 policy has four racial categories and the revised 1997 version has five racial categories. Individuals with strong preferences as to including (or not) various categories can support our proposal as it would only increase the freedom of individuals and groups to define and assign characteristics to categories. Our proposal does not require or preclude changes to the number or arrangement of the minimum standard categories.

Agencies will be free to adopt, create, or otherwise use a variety of definitions in their administrative, survey, or other data functions. Our proposal does not ban the use of definitions for individual racial categories, but it does eliminate them from the federal minimum standards. This may lead to a situation where there are multiple operative definitions of the same or similar racial category, which reflects the complex nature of race and a plurality of perspectives, not a lack of rigor or confusion. Individual agencies may continue to use the 1997 Directive 15 definitions if deemed appropriate for particular contexts though, as we have argued, these are fundamentally

flawed.

Our proposal is narrowly tailored out of consideration for the administrative process of revising Directive 15. There is an extensive consultation period with stakeholders both outside and within the federal government, including other organizations that share data with the federal government, community groups and advocates. While it would be tempting to write from scratch our preferred Directive 15 text, we value the democratic potential of deliberation that is part of the revision process and also the specialized knowledge that federal administrators have around the costs of implementation associated with Directive 15 in terms of survey length, data processing and storage, and redesigning surveys.

## **5 Rationale and discussion**

### **5.1 Primary rationale**

In this section, we describe the rationale and implications of the proposal to remove the Directive 15 definitions that define membership in racial groups. Most importantly, all of the problems listed in Section 3 of this paper are immediately resolved. Without the definitions, the problems with inconsistency, lack of comprehensiveness, and circularity go away, the problems with defining race in a way that unhelpfully conflates race with other factors such as nationality or relationship to the so-called “original peoples” of various continents go away, and the problems with the federal government inappropriately defining membership and characteristics of racial groups goes away.

As we have discussed, the definitions in Directive 15 inappropriately constrain identity options. For the purposes of most federal statistics, a person is unable to identify as Black or African American without also symbolically accepting the Directive’s definition of this group. Individuals and communities become aware of the problems with racial classifications and the problematic Hispanic or Latino category through filling out surveys or completing administrative forms that ask this information, but also through the numerous news and opinion pieces critiquing the U.S. government’s data practices around race. These issues enter mainstream political discourse and are discussed in electoral campaigns. Eliminating the definitions from the minimum standards removes a significant piece of controversy around the federal handling of data on race, while yet preserving flexibility in how data is collected and reported.

There is also a positive dimension to this change: getting rid of the definitions better aligns Directive 15 with the goals of racial justice. A commitment to racial justice is, of course, consistent with a “scientific” view of race because, as stratification economists, we understand racial hierarchy not as a neutral socio-economic phenomenon but as an unjust system. There are many examples for how getting rid of the definitions and denaturalizing race is aligned with anti-racist praxis. Calhoun (1958), for example, helped to undermine anti-miscegenation laws by showing conflicting definitions of racial groups. Calhoun (1958) essentially asks, how does the State expect to maintain a legal and cultural taboo on romantic relationships that cross group boundaries when the boundaries vary inconsistently from place to place and the racial group definitions contradict each other?

Another justification for eliminating the definitions concerns white people’s understanding of their own racial identity as key to fostering a commitment to take anti-racist actions (Wingfield, 2015). That is, individuals interrogating how their own race affects their life is key and, for white people, this likely has little to do with “having origins in any of the original peoples of Europe, the Middle East, or North Africa.” The definitions in Directive 15 constitute an act of communication by the federal government defining the boundaries and characterizing the broad racial groups that presumably we all belong to. Even if the benefits from our proposal are “merely” symbolic, race operates significantly on the level of representation and ideology as a necessary conjugate to maintain its instrumental purpose of unfairly allocating material resources and life chances.

Our proposal can also be justified with reference to the modern understanding of race as a socio-political construct that has the appearance of being an individual quality but is more accurately characterized as primarily a group-based phenomenon. Many people experience their racial identity as context-specific and multifaceted, and they often experience conflict between self-identity and outward perceptions. The definitions give the appearance of creating a straightforward criterion for racial identity, but the contradictions of race are not and cannot be resolved in the way that Directive 15 approaches racial definitions. The contradictions of race are inherent to and fundamentally central to understanding how it operates around arbitrary, flexible traits to create a powerful social hierarchy. The system is resistant to change not because its coherence but, in some ways, despite this. The system is resistant to change because it is fundamentally maintained, defended, reinforced, and allowed to change with the times by individual and group-level efforts on the part of those who gain from the social hierarchy, primarily those in the dominant group in any racial

hierarchy. As Omi (1985, p. 21) writes:

Among scholars there is a continuous temptation to think of race as an essence, as something fixed, concrete and objective. There is also an opposite temptation: to imagine race as a mere illusion, a purely ideological construct which masks some other more fundamental division, such as class.

As Omi (1985) argues, both of these frameworks are inadequate.

Data on race is important primarily because it is necessary for quantifying how racial hierarchy manifests in society and how we might create change towards greater racial justice and liberation. We can better balance the benefits of data collection, which provides a powerful way of understanding the reality of racial hierarchy as a produced socio-political phenomenon with the symbolic violence of asking people to reduce this complexity to a choice made from a list of pre-populated categories by having the federal government not dictate how the groups are characterized.

## 5.2 Benefits of the proposal

As part of our argument, we illustrate the effects of our proposal by describing what we imagine statistical practices would look like if definitions were removed from Directive 15. If our proposal were implemented, the government would collect data on surveys, administrative forms, or other methods, much as it currently does. Neither the phrasing of the questions nor the categories offered in the case of multiple checkboxes would necessarily change by this proposal because our proposal does not affect these aspects of the Directive.

In fact, our proposal would not affect any additional context or definitions that agencies provide; each agency would be free to choose if it provided additional information for racial categories and what information it offered. This follows current practice with one exception: when an agency chooses to offer *only* the categories given in Directive 15. In this circumstance, a reasonable reading of the standards dictates that the definitions from Directive 15 should be used. But, *if any change is made to the list of racial categories, such as providing more detailed options, it is not clear that the definitions would still be usable much less required by the Directive.* In other words, agencies that wish to use the Directive 15 definitions must largely limit themselves to the five broad racial categories in the Directive because adding categories may change the meaning or appropriateness of

the definitions. And, if definitions are provided, the agency would need to create its own definition for the new terms.

To illustrate, consider a minor change, replacing the White category option with three separate options for European, Middle Eastern, and North African. The definition for white is no longer needed since it would be removed, but the agency, if they choose to define racial categories, would now require definitions for the three categories that were added. To maintain a coherent approach, it would be necessary to define the boundaries of the three regions that were added, and it is likely that the Black or African American category definition would need to be changed because these regions are not consistently defined across different settings.

The point that this example illustrates is that the definitions maintain even their limited coherence only when the racial categories that an agency chooses to use are limited to the five defined in the Directive; more detailed data collection *today* requires the agency to make choices about whether to provide their own definitions and how to write new definitions. Our proposal would simply make this standard practice for all instances of data collection. We expect that the current default, wherein most surveys do not define provide definitions for racial categories, would continue. There is no expectation that data collected at a more detailed level than the minimum categories in Directive 15 would be comparable. The only source of potentially lesser data comparability is if agencies provide the Directive 15 categories with conflicting definitions but we judge this to be a rare occurrence: (a) most instances of data collection do not provide definitions, (b) there is evidence that individuals are not aware of the definitions or provide their answer about which category they see themselves a part of irrespective of the definitions provided, (c) data collection is commonly done with more detailed categories, and (d) there is nothing preventing agencies from using what we hope to become the legacy definitions—though flawed, these will likely remain an important anchoring text for coordination when agencies feel that definitions are warranted.

For the purposes of reporting, agencies must at a minimum use the categories given in Directive 15. More detailed information can be provided, but for comparability between agency reports it is encouraged that reports be able to be aggregated to the minimum categories. Under our proposal, this process would not change with one exception: rather than interpreting each group statistic as reflecting strictly the individuals described in the definition (largely, those “having origins in any of the original peoples. . .” of various continents), the interpretation would have to conform with

the common social definitions of each term because these are the ones that likely conform to the data generation process. It is not clear that individuals change how they would answer the race or ethnicity question if provided a definition, though, as we have argued, the definitions have affected the social understandings of these terms. Those who normally identify with one group are not likely change their identification when presented with a new definition and, if they were to, it is not clear that this change would be helpful or intended for statistical analysis around questions of racial inequality.

To summarize, under our proposal, the researcher interpreting results collected under a new Directive 15 (without definitions) would need to ask themselves what the social, economic, and political meaning of each racial term was at the time the survey was completed, as applicable to their research scenario. This is, of course, what we would expect to happen in high quality research today. The definitions provide a false sense of objectivity and knowledge. They appear to conclusively tell us what it means when someone selects a particular racial group (i.e. it means that they have “origins in any of the original peoples...” of a continent), but this is not in fact adequate for understanding an individual’s selections and it may be quite besides the point.

Our proposal would eliminate a significant piece of controversy and debate around Directive 15: periodically revising the definitions. Writing the definitions for each group involves consulting with experts on racialization and survey methodology, reading the vast literature on best practices for collecting data on race, holding stake-holder meetings, etc. all with the aim of producing a maximally accurate and minimally disliked version of the definitions. But, it is not possible for the data collection agency to “accurately” set boundaries around racial identity and it is likely not possible to craft definitions that do not displease at least a sizable minority. The best we can achieve with the latter is a plurality of possible people who belong to a group objecting to the definition. By getting rid of the definitions, these problems go away or are at least deferred to the more specific application of the relevant definitions, if they are used, in particular surveys, forms, or reports.

In summary, our proposal would end the regular need to update definitions, the regular political fights about the definitions, and it would end on-going symbolic violence associated with the definitions.

### 5.3 Clarifying what the proposal is not

Our proposal to remove definitions from Directive 15 is not a statement that race or even that individual racial categories cannot be defined. There are political efforts aimed at curtailing critical attention to racial inequality and one of their manifestations is advocacy around statistical data collection. Many different proposals have been structured with the instrumental intent of reducing critical attention to racial hierarchies (Prewitt, 2016). Omi (2001, p. 248) cites one example, writing, “House Speaker Newt Gingrich (1997)... used the issue of multiraciality to illustrate the indeterminacy of racial categories and to vigorously advocate for their abolition in government data collection, much as advocates of color-blindness do.” Our proposal is given in the spirit of more accurate collection and reporting around race, and it should be interpreted as aligned with calls for more disaggregated data and calls for attention to the multidimensional nature of race, including more data collected on skin shade (Goldsmith et al., 2006, 2007; Hamilton et al., 2009; Diette et al., 2015; Jones, 2000).

Going further, some have argued that multiracial identities have destabilizing potential on racial classifications or that we should pursue a strategy that minimizes or eliminates any explicit mention of race as a precondition of antisubordination (Johnson, 1996). We tend to disagree with this perspective. As Crenshaw (1988, p. 1336) writes, “History has shown that the most valuable political asset of the Black community has been its ability to assert a collective identity and to name its collective political reality.” But, our proposal to remove the definitions from Directive 15 does not come on either side of the fence. Our proposal does not require or encourage the government to collect less data on race and ethnicity or more data. Whether one believes that anti-racism requires abandoning racial identity or, conversely, that it requires continued political organization along racial identity lines, one can support the idea of removing definitions from Directive 15.

Our proposal should not be taken as a recommendation for changes outside of Directive 15, though the discussion and reasoning provided may be informative in other contexts. Quantitative analysis around race, like many other social inequalities, is complex. We have focused on the two-part race and ethnicity question in Directive 15, but it is likely that more questions and information are required to inform data analysis on race. Again, this proposal is focused on the federal minimum standards for data collection on race, not designing federal best practices, proposals for the Census

in particular, or any other specific setting.

There is a link between our critique of the definitions, which point loosely to consanguinity (ancestry) as an important determinant of race, and critiques of race as a biological concept. In a biomedical research context, Johnson (2008) writes: “It is not their race that predisposes them to hypertension, but their discriminatory treatment that is predicated on their grosser morphological traits. I cannot believe that there is anything in their genetic makeup that predisposes ‘blacks’ to have a higher rate of hypertension, because there is no identifiable genetic definition of a black person, only a societally constructed, morphologically based definition.” We align ourselves with the call for more analysis of racialized organizations (Ray, 2019), institutions, systems, and phenomena based on data that are not limited to individual reports on race.

As stated earlier, we do not specify or recommend a list of categories to be used in Directive 15, nor do we weigh in on the debate around including “Hispanic or Latino” as an option among the race categories, eliminating the two-question format. This is a proposal that seems to be favored by the Census, the organization currently heading the review of Directive 15. In our view, the problem largely comes down to language. “Hispanic or Latino” is a racial category insofar as many people are racialized as brown/Chicanx/Hispanic/Latino, but Hispanic is not a race in that Latinxs are not all racialized in the same way, certainly not as brown/Chicanx/Hispanic/Latino. Resolving this issue likely requires changes to the question and not to the category names (López & Hogan, 2021; López, 2013).

Finally, our proposal does not require an open-ended, text box question for race, wherein individuals are asked to answer a question such as, “When you think about your racial identity, what group or groups or what term or terms best describe your racial identity in most settings?” This approach has many advantages, but we acknowledge that it is not an immediate, practical solution for Directive 15. In short, our proposal is narrow and leaves many unresolved issues, but this is in keeping with the complex, far-reaching nature of Directive 15. The recommendations that we do make are, as I hope we have shown, supported by the evidence and argument.

#### **5.4 Comparability of data on race over time**

Finally, a comment about comparability of data over time. Data on race changes its meaning over time due to two factors: changes in the social meaning attached to different groups or terms and

changes in survey methodology. Similarly, individuals with both white and black parentage changed their behavior in surveys coincident with the election and visibility of President Barack Obama, who identified strongly as someone with both black and white heritage (Mason, 2017). This form of change over time reflects the fundamental social nature of race. As another example, “Prior to the late 1960s. . . there were no people who identified as ‘Asian American’” because that category did not exist (Espiritu, 1993, p. 17). But there are also changes in the data that come from purely methodological decisions. The composition of Asian or Pacific Islander changed when the group’s definition changed in 1977 with a separate category for Native Hawaiians and Other Pacific Islands. Our proposal would eliminate one source of data comparability, that of changing definitions over time.

The meaning of race as reflected in data sets changes over time, but our proposal would eliminate one source of variation: changes to the definitions. The problem of keeping up with social categories remains. This problem has additional complexity in the context of the federal government because, “as racial categories change, so do racial hierarchies” (Bashi 1998). In other words, particularly visible decisions around statistical practices by the federal government, including Directive 15 and the decennial Census, have the power to affect social reality when their primary intended purpose is to facilitate quantitative measurement of social reality. Seen in this light, perhaps the observation that “no single set of racial categories has been used in more than two censuses, and most were only used once” (Martin et al., 1990, p. 553) is rather hopeful, as opposed to the rigidity of the definitions of Directive 15 which have remained largely unchanged since 1977.

## **6 Conclusion**

The race categories identified by Census and OMB have powerful social meaning. Self-reported race correlates strongly with a wide range of social outcomes. But self-reported race is not selected based upon the official definitions. Given the inadequacy of the definitions and the fact they do not truly inform the choices made by respondents to federal surveys, we recommend dispensing with the definitions altogether. Independent research and opportunities to receive public comments, including from academics, can insure that Office of Management and Budget and the U.S. Census Bureau are making use of categories that are popularly understood, however defined, and socially

meaningful. There is no need to attach definitions plagued by severe weaknesses to the categories.

## References

- 94th Congress (1976). Joint resolution relating to the publication of economic and social statistics for Americans of Spanish origin or descent.
- Bourdieu, P. (2009). *Language and symbolic power*. Cambridge: Polity Press, 1. publ. in paperb., repr ed.
- Calhoun, J. C. (1958). Who is a Negro? *Florida Law Review*, 11(2), 235–239.
- Citro, C. F. (1997). Window on Washington: Recognizing Diversity: Recommendations to OMB on Standards for Data on Race and Ethnicity. *CHANCE*, 10(4), 26–31.  
URL <http://www.tandfonline.com/doi/full/10.1080/09332480.1997.10542059>
- Crenshaw, K. W. (1988). Race, Reform, and Retrenchment: Transformation and Legitimation in Antidiscrimination Law. *Harvard Law Review*, 101(7), 1331–1387.
- Darity, W. A., Mason, P. L., & Stewart, J. B. (2006). The economics of identity: The origin and persistence of racial identity norms. *Journal of Economic Behavior & Organization*, 60(3), 283–305.  
URL <https://linkinghub.elsevier.com/retrieve/pii/S0167268105001277>
- Darity, W. A., & Mullen, A. K. (2020). *From Here to Equality: Reparations for Black Americans in the Twenty-First Century*. Chapel Hill: The University of North Carolina Press.
- Desautels-Stein, J. (2012). Race as a Legal Concept. *Columbia Journal of Race and Law*, 2(1), 1–74.
- Diette, T. M., Goldsmith, A. H., Hamilton, D., & Darity, W. (2015). Skin Shade Stratification and the Psychological Cost of Unemployment: Is there a Gradient for Black Females? *The Review of Black Political Economy*, 42(1-2), 155–177.  
URL <http://journals.sagepub.com/doi/10.1007/s12114-014-9192-z>
- Eschbach, K., & Taylor, J. (forthcoming). The Explosion of the 2020 Census “Indian” Population and Its Implications for Tribal Policymaking. In N. Hill, K. Ratteree, M. Hill, & D. Hill (Eds.) *Beyond Blood Quantum: Refusal to Disappear*. Fulcrum Publishing.
- Espiritu, Y. (1993). *Asian American Panethnicity: Bridging Institutions and Identities*. Philadelphia: Temple University Press, first edition ed.
- Fears, D. (2003). The Roots of ‘Hispanic’; 1975 Committee of Bureaucrats Produced Designation: [FINAL Edition]. *The Washington Post*, (p. A.21). Num Pages: 0 Publisher: WP Company LLC d/b/a The Washington Post.  
URL <https://www.proquest.com/usnews/docview/409573132/abstract/8E16E4A0851C49CCPQ/1>
- Federal Interagency Committee on Education (1975). Report of the Ad Hoc Committee on Racial and Ethnic Definitions. Tech. rep.

- Fields, B. J. (1982). Ideology and Race in American History. In J. M. Kousser, & J. M. McPherson (Eds.) *Region, Race and Reconstruction: Essays in Honor of C. Vann Woodward*, (pp. 143–177). New York: Oxford University Press.
- Forbes, J. D. (1992). The Hispanic Spin: Party Politics and Governmental Manipulation of Ethnic Identity. *Latin American Perspectives*, 19(4), 59–78.  
URL <http://journals.sagepub.com/doi/10.1177/0094582X9201900406>
- Ford, C. A. (1994). Administering Identity: The Determination of "Race" in Race-Conscious Law. *California Law Review*, 82(5), 1231.  
URL <https://www.jstor.org/stable/3480910?origin=crossref>
- Fuentes, A., Ackermann, R. R., Athreya, S., Bolnick, D., Lasisi, T., Lee, S.-H., Mclean, S.-A., & Nelson, R. (2019). AAPA Statement on Race and Racism. *American Journal of Physical Anthropology*, 169(3), 400–402.
- Gimenez, M. E. (1989). Latino/"Hispanic"—Who Needs a Name? The Case against a Standardized Terminology. *International Journal of Health Services*, 19(3), 557–571.  
URL <http://journals.sagepub.com/doi/10.2190/HN6N-P1TH-8CHL-KW5X>
- Goldsmith, A. H., Hamilton, D., & Darity, W. (2006). Shades of Discrimination: Skin Tone and Wages. *American Economic Review*, 96(2), 242–245.  
URL <http://pubs.aeaweb.org/doi/10.1257/000282806777212152>
- Goldsmith, A. H., Hamilton, D., & Darity Jr., W. A. (2007). From Dark to Light: Skin Color and Wages Among African-Americans. *Journal of Human Resources*, XLII(4), 701–738.  
URL <http://jhr.uwpress.org/lookup/doi/10.3368/jhr.XLII.4.701>
- Hamilton, D., Goldsmith, A. H., & Darity, W. (2009). Shedding "light" on marriage: The influence of skin shade on marriage for black females. *Journal of Economic Behavior & Organization*, 72(1), 30–50.  
URL <https://linkinghub.elsevier.com/retrieve/pii/S0167268109001577>
- Hernández, T. K. (1998). Multiracial Discourse: Racial Classifications in an Era of Color-blind Jurisprudence. *Md. L. Rev.*, 57, 97–173.
- Hitlin, S., Brown, J. S., & Elder, G. H., Jr. (2007). Measuring Latinos: Racial vs. Ethnic Classification and Self-Understandings. *Social Forces*, 86(2), 587–611.  
URL <https://doi.org/10.1093/sf/86.2.587>
- Hollinger, D. A. (2000). *Postethnic America: beyond multiculturalism*. New York: BasicBooks, 10th anniversary ed., revised and updated ed.
- Johnson, A. M. (1996). Destabilizing Racial Classifications Based on Insights Gleaned from Trade-mark Law. *California Law Review*, 84(4), 887–952. Publisher: California Law Review, Inc.  
URL <https://www.jstor.org/stable/3480986>
- Johnson, A. M., Jr. (2008). The Re-Emergence of Race as a Biological Category: The Societal Implications—Reaffirmation of Race. *Iowa Law Review*, 94(1547-1585).

- Jones, T. (2000). Shades of Brown: The Law of Skin Color. *DUKE LAW JOURNAL*, 49.
- Larena, M., Sanchez-Quinto, F., Sjödin, P., McKenna, J., Ebeo, C., Reyes, R., Casel, O., Huang, J.-Y., Hagada, K. P., Guilay, D., Reyes, J., Allian, F. P., Mori, V., Azarcon, L. S., Manera, A., Terando, C., Jamero, L., Sireg, G., Manginsay-Tremedal, R., Labos, M. S., Vilar, R. D., Latiph, A., Saway, R. L., Marte, E., Magbanua, P., Morales, A., Java, I., Reveche, R., Barrios, B., Burton, E., Salon, J. C., Kels, M. J. T., Albano, A., Cruz-Angeles, R. B., Molanida, E., Granehall, L., Vicente, M., Edlund, H., Loo, J.-H., Trejaut, J., Ho, S. Y. W., Reid, L., Malmström, H., Schlebusch, C., Lambeck, K., Endicott, P., & Jakobsson, M. (2021). Multiple migrations to the Philippines during the last 50,000 years. *Proceedings of the National Academy of Sciences*, 118(13), e2026132118.  
URL <https://pnas.org/doi/full/10.1073/pnas.2026132118>
- Lew, J. J. (2000). Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement. Tech. rep., Office of Management and Budget.
- López, N. (2013). Killing two birds with one stone? Why we need two separate questions on race and ethnicity in the 2020 census and beyond. *Latino Studies*, 11(3), 428–438.  
URL <http://link.springer.com/10.1057/1st.2013.25>
- López, N., & Hogan, H. (2021). What's Your Street Race? The Urgency of Critical Race Theory and Intersectionality as Lenses for Revising the U.S. Office of Management and Budget Guidelines, Census and Administrative Data in Latinx Communities and Beyond. *Genealogy*, 5(3), 75.  
URL <https://www.mdpi.com/2313-5778/5/3/75>
- Margolis, M. (1995). Brazilians and the 1990 United States Census: Immigrants, Ethnicity, and the Undercount. *Human Organization*, 54(1), 52–59.  
URL <https://meridian.allenpress.com/human-organization/article/54/1/52/72519/Brazilians-and-the-1990-United-States-Census>
- Martin, E., Demaio, T. J., & Campanelli, P. C. (1990). Context Effects for Census Measures of Race and Hispanic Origin. *Public Opinion Quarterly*, 54(4), 551.  
URL <https://academic.oup.com/poq/article-lookup/doi/10.1086/269227>
- Martinez, G. A. (1997). The Legal Construction of Race: Mexican-Americans and Whiteness. *Harvard Latino Law Review*, 2, 321–347.
- Mason, P. L. (2017). Not Black-Alone: The 2008 Presidential Election and Racial Self-Identification among African Americans. *The Review of Black Political Economy*, 44(1-2), 55–76.  
URL <http://journals.sagepub.com/doi/10.1007/s12114-017-9247-z>
- Mason, P. L. (2023). *The Economics of Structural Racism*. Cambridge, United Kingdom ; New York, NY: Cambridge University Press, new edition ed.
- Mathieson, I., Lazaridis, I., Rohland, N., Mallick, S., Llamas, B., Pickrell, J., Meller, H., Guerra, M. A. R., Krause, J., Anthony, D., Brown, D., Fox, C. L., Cooper, A., Alt, K. W., Haak, W., Patterson, N., & Reich, D. (2015). Eight thousand years of natural selection in Europe. Pages: 016477 Section: New Results.  
URL <https://www.biorxiv.org/content/10.1101/016477v1>

- Mirandé, A. (Ed.) (2019). *Gringo Injustice: Insider Perspectives on Police, Gangs, and Law*. New York London: Routledge, 1st edition ed.
- Mora, G. C. (2014). *Making Hispanics: How Activists, Bureaucrats, and Media Constructed a New American*. Chicago ; London: University of Chicago Press, illustrated edition ed.
- Myers Jr., S. L. (1997). The Error of the Third Type. In C. W. Hartman (Ed.) *Double Exposure: Poverty and Race in America*. New York: Routledge.
- Office of Management and Budget (1978). Transfer of Responsibility for Certain Statistical Standards from OMB to Commerce.
- Office of Management and Budget (1994). Standards for the Classification of Federal Data on Race and Ethnicity.
- Office of Management and Budget (1995). Standards for the Classification of Federal Data on Race and Ethnicity. Vol. 60, No. 166.
- Office of Management and Budget (1997). Revisions to the Standards for the Classification. Vol. 62, No. 210.
- Office of Management and Budget (2023). Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards. Tech. rep.
- Omi, M. (1985). Racial Identity and the State: The Dilemmas of Classification. *15*.
- Omi, M. A. (2001). The Changing Meaning of Race. In N. J. Smelser, W. J. Wilson, & F. Mitchell (Eds.) *America Becoming: Racial Trends and Their Consequences*, vol. 1, (pp. 243–263). Washington, D.C.: National Academies Press. Pages: 9599.  
URL <http://www.nap.edu/catalog/9599>
- Prewitt, K. (2016). *What Is "Your" Race?: The Census and Our Flawed Efforts to Classify Americans*. Princeton University Press, reprint edition ed.
- Ray, V. (2019). A Theory of Racialized Organizations. *American Sociological Review*, *84*(1), 28.
- Robbin, A. (2000). The politics of representation in the US national statistical system: origins of minority population interest group participation. *Journal of Government Information*, *27*(4), 431–453.  
URL <https://linkinghub.elsevier.com/retrieve/pii/S1352023700001787>
- Robinson, C. J., & Kelley, R. D. G. (2000). *Black Marxism: The Making of the Black Radical Tradition*. Chapel Hill, N.C: The University of North Carolina Press, 2nd edition ed.
- Rodriguez, C. E. (1997). *Latin Looks: Images Of Latinas And Latinos In The U.s. Media*. Boulder, Colo: Routledge, 1st edition ed.
- Rosa, J. (2019). *Looking Like a Language, Sounding Like a Race*. Oxford University Press. Google-Books-ID: sQJ6DwAAQBAJ.
- Rosa, J., & Flores, N. (2017). Unsettling race and language: Toward a raciolinguistic perspective.

- Language in Society*, 46(5), 621–647. Publisher: Cambridge University Press.  
 URL <https://www.cambridge.org/core/journals/language-in-society/article/unsettling-race-and-language-toward-a-raciolinguistic-perspective/30FFC5253F465905D75CDDFF1C1363AE3>
- Roth, W. D. (2016). The multiple dimensions of race. *Ethnic and Racial Studies*, 39(8), 1310–1338. Publisher: Routledge \_eprint: <https://doi.org/10.1080/01419870.2016.1140793>.  
 URL <https://doi.org/10.1080/01419870.2016.1140793>
- Schuster, L. (2021). We’re Reporting Census Data All Wrong.  
 URL <https://www.bostonindicators.org/article-pages/2021/december/census-reporting>
- Shadowen, S. D. (2018). U.S. Border Patrol’s Policy of Extrajudicial Killing. *Berkeley La Raza Law Journal*, 28(1), 1. Number: IR.  
 URL <http://lawcat.berkeley.edu/record/1128490>
- Skerry, P. (2000). *Counting on the Census?: Race, Group Identity, and the Evasion of Politics*. Washington, D.C: Brookings Institution Press, 1st us - 1st printing edition ed.
- State Health Access Data Assistance Center at the University of Minnesota (2021). Collection of Race, Ethnicity, Language (REL) Data in Medicaid Applications: A 50-state Review of the Current Landscape. Tech. rep.
- Swartz, D. (1997). *Culture and Power: The Sociology of Pierre Bourdieu*. University of Chicago Press. Google-Books-ID: pNcnAgAAQBAJ.
- Tamayo Lott, J. (1997). The Limitations of Directive 15. In *Double Exposure: Poverty and Race in America*. New York: Routledge.
- Toro, L. A. (1995). A People Distinct from Others: Race and Identity in Federal Indian Law and the Hispanic Classifications in OMB Directive No. 15. *Texas Law Review*, 26(4), 1219–1274.
- Wallman, K. K. (1998). Data on Race and Ethnicity: Revising the Federal Standard. *The American Statistician*, 52(1), 31–33. Publisher: Taylor & Francis \_eprint: <https://www.tandfonline.com/doi/pdf/10.1080/00031305.1998.10480533>.  
 URL <https://www.tandfonline.com/doi/abs/10.1080/00031305.1998.10480533>
- Wallman, K. K., Evinger, S., & Schechter, S. (2000). Measuring Our Nation’s Diversity: Developing a Common Language for Data on Race/Ethnicity. *American Journal of Public Health*, 90(11), 1704–1708.
- Walter, M. (2013). *Indigenous statistics: a quantitative research methodology*. Walnut Creek, CA: Left Coast Press.
- Wingfield, A. H. (2015). Color Blindness Is Counterproductive. Section: Politics.  
 URL <https://www.theatlantic.com/politics/archive/2015/09/color-blindness-is-counterproductive/405037/>
- Yang, T. (2005). Choice and Fraud in Racial Identification: The Dilemma of Policing Race in

Affirmative Action, the Census, and a Color-Blind Society. *SSRN Electronic Journal*.  
URL <http://www.ssrn.com/abstract=783404>

Table 1. Summary of OMB Directive 15 definitions in 1977, 1997, and proposed 2023 changes

1977		1997		2023
Category	Definition	Category	Definition	Proposed changes
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.	No change	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.	Replace definition with: "The category 'American Indian or Alaska Native' includes all individuals who identify with any of the original peoples of North, Central, and South America."
Asian or Pacific Islander	A person having origins in any of the original peoples of the Far East, Southeast Asian, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands, and Samoa.	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	Replace "Far East" with "East Asian"
Black	A person having origins in any of the black racial groups of Africa.	Black or African American	A person having origins in any of the black racial groups of Africa. Terms such as "Haitian" or "Negro" can be used in addition to "Black or African American."	Remove "Negro"
Hispanic	A person or Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.	Hispanic or Latino	A person of Cuban, Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race. The term, "Spanish origin," can be used in addition to "Hispanic or Latino."	Remove redundant reference to "Cuban"
White	A person having origins in any of the original peoples of Europe, North Africa, or the Middle East.	No change	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	
		Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	Remove "Other" from category name