

2024 Revision to Statistical Policy Directive 15

Standards for Maintaining, Collecting, and Presenting Federal Data on
Race and Ethnicity

An Overview for American Indian/Alaska Native Tribes, Organizations, and Individuals

The Indigenous Student Identification Project is supported by the AIR Equity Initiative.

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Introduction

- On March 28, 2024, the Office of Management and Budget (OMB) released the [Revisions to Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.](#)
- Key changes to the collection of American Indian/Alaska Native (AI/AN) data include:
 - collecting race and ethnicity together with a single question;
 - collecting “detailed information” on race and ethnicity by default; and
 - updating the terminology, definitions, and question wording to eliminate language about “tribal affiliation or community attachment.”
- Agencies have 18 months to develop plans for implementation; they must implement the revisions within five (5) years.

Who Made The Revisions?

In 2022, OMB convened the Federal Interagency Technical Working Group on Race and Ethnicity Standards (the Working Group) composed of federal career staff who represent programs that collect or use race and ethnicity data.

Public comment was invited from February through April of 2023.

The Working Group provided recommendations which the OMB took into account when developing guidance.

Agencies Invited to Nominate Representatives to the Working Group

• Bureau of Economic Analysis • Bureau of Justice Statistics • Bureau of Labor Statistics • Bureau of Transportation Statistics • Census Bureau • Economic Research Service • Energy Information Administration • National Agricultural Statistics Service • National Center for Education Statistics • National Center for Health Statistics • National Center for Science and Engineering Statistics • Office of Research, Evaluation and Statistics (SSA) • Statistics of Income (IRS) • Agency for International Development	• Department of Agriculture • Department of Commerce • Department of Defense • Department of Education • Department of Energy • Department of Health and Human Services • Department of Homeland Security • Department of Housing and Urban Development • Department of the Interior • Department of Justice • U.S. Equal Employment Opportunity Commission	• Department of Labor • Department of State • Department of Transportation • Department of the Treasury • Department of Veterans Affairs • Environmental Protection Agency • General Services Administration • National Aeronautics and Space Administration • National Science Foundation • Nuclear Regulatory Commission • Office of Personnel Management • Small Business Administration • Social Security Administration
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How does the guidance define American Indian/Alaska Native?

“Individuals with origins in any of the original peoples of North, Central, and South America, including, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, and Maya.”

- This removes language in the previous definition which conflated other aspects of identity with race/ethnicity (i.e. the phrase “who maintain Tribal affiliation or community attachment”).
- The definition makes no distinctions between race, ethnicity, national origin, enrollment, descendency, or affiliation, nor between federally recognized tribal affiliation and state-recognized, unrecognized, terminated, or non-U.S. tribal affiliations or community attachments.

Race and ethnicity will be collected with a single question.

The current "two part" question format that separates race and ethnicity will be changed to just one question that asks respondents to identify their "race or ethnicity." A "Middle Eastern or North African" category will be added (for a total of seven).

Are you Hispanic or Latino?

☐ No, not Hispanic or Latino

☐ Yes, Hispanic or Latino

What is your race? *Select one or more.*

☐ American Indian or Alaska Native

☐ Asian

☐ Black or African American

☐ Native Hawaiian or Other Pacific Islander

☐ White



What is your race or ethnicity?
Select all that apply.

☐ White

☐ Hispanic or Latino

☐ Black or African American

☐ Asian

☐ American Indian or Alaska Native

☐ Middle Eastern or North African

☐ Native Hawaiian or Pacific Islander

Collection of detailed race and ethnicity categories will be required by default

“...agencies are required to collect the detailed categories described in this Notice as a default. ... An agency may submit a request to [the Office of Information and Regulatory Affairs] for an exemption to the requirement to collect more detailed data beyond the minimum categories if the agency determines that the potential benefit of the detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality.”

What is your race and/or ethnicity?
Select all that apply and enter additional details in the spaces below.

☐ **American Indian or Alaska Native** – Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.

☐ **Asian** – Provide details below.
☐ Chinese ☐ Asian Indian ☐ Filipino
☐ Vietnamese ☐ Korean ☐ Japanese
Enter, for example, Pakistani, Hmong, Afghan, etc.

☐ **Black or African American** – Provide details below.
☐ African American ☐ Jamaican ☐ Haitian
☐ Nigerian ☐ Ethiopian ☐ Somali
Enter, for example, Trinidadian and Tobagonian, Ghanaian, Congolese, etc.

☐ **Hispanic or Latino** – Provide details below.
☐ Mexican ☐ Puerto Rican ☐ Salvadoran
☐ Cuban ☐ Dominican ☐ Guatemalan
Enter, for example, Colombian, Honduran, Spaniard, etc.

☐ **Middle Eastern or North African** – Provide details below.
☐ Lebanese ☐ Iranian ☐ Egyptian
☐ Syrian ☐ Iraqi ☐ Israeli
Enter, for example, Moroccan, Yemeni, Kurdish, etc.

☐ **Native Hawaiian or Pacific Islander** – Provide details below.
☐ Native Hawaiian ☐ Samoan ☐ Chamorro
☐ Tongan ☐ Fijian ☐ Marshallese
Enter, for example, Chuukese, Palauan, Tahitian, etc.

☐ **White** – Provide details below.
☐ English ☐ German ☐ Irish
☐ Italian ☐ Polish ☐ Scottish
Enter, for example, French, Swedish, Norwegian, etc.



American Indian/Alaska Native “detailed” collection

“Providing a write-in field is especially critical for the American Indian or Alaska Native category, which does not have required detailed categories under these standards.

“For the American Indian or Alaska Native category, the instructions for the write-in option should read: ‘Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.’

“Any disaggregated data collected in addition to the detailed categories presented here (for example, a drop-down list for the American Indian or Alaska Native category) must be organized in such a way that the additional categories can be aggregated into the minimum categories.”



American Indian/Alaska Native “detailed” collection

The "detailed" field is intended to capture "national origin" information.

It is self-identified data and makes no distinction between:

- National origin
- Tribal citizenship/enrollment
- Descendancy
- Cultural affiliation
- Community attachment

The current Common Education Data Standards element for "tribal affiliation" consists of a list of the 574 federally-recognized Tribes.



Data reporting and disaggregation

“The tabulation procedures used by Federal agencies **must** result in the production of as much information on race and/or ethnicity as possible, including data on people reporting multiple categories. (emphasis added)

“However, Federal agencies must not release race and ethnicity data if doing so would violate agency or Federal policies designed to ensure data quality or protect respondent privacy or confidentiality.”



Data reporting and disaggregation

When data are presented, Federal agencies **are encouraged to** use one or more of three approaches:

Approach 1. The alone or in combination approach combines all individuals belonging to a particular racial or ethnic group (whether alone or in combination with another racial or ethnic group). For example, a respondent who reported being both White and Black or African American would fall into both the “White alone or in combination” category and the “Black or African American alone or in combination” category. Percentages across the categories sum to greater than 100 percent because the response categories are not mutually exclusive in this approach.

Data reporting and disaggregation

Approach 2. The most frequent multiple responses approach reports as many possible race and ethnicity combinations as possible. For example, an agency could report the seven minimum race and ethnicity categories alone, as well as race and ethnicity combinations meeting a specific population threshold or combinations of particular interest, or all observed combinations of multiple race and ethnicity groups. The percentages will sum to 100 percent because the response categories are mutually exclusive.

Data reporting and disaggregation

Approach 3. The combined Multiracial and/or Multiethnic approach presents data for those reporting one of the seven race and/or ethnicity categories alone, and then combines all other respondents reporting multiple race and/or ethnicity categories into an aggregated Multiracial and/or Multiethnic category. ... The percentages in this approach will sum to 100 percent because the response categories are mutually exclusive.”

This is the current approach used by the U.S. Department of Education and many other federal agencies. The “two or more races” category balloons with each passing year as the country’s population of people who identify with more than one race grows.



RE: Approach 3 and compliance

“[The combined Multiracial and/or Multiethnic] approach will often obscure the specific racial and ethnic diversity of the population (e.g., over half of the population who identify as American Indian or Alaska Native and Native Hawaiian or Pacific Islander may be assigned to the Multiracial and/ or Multiethnic group).

*“Therefore, Federal agencies **should** use this approach in conjunction with another approach (like Approaches 1 or 2) **to comply with the requirement** to report as much information on race and ethnicity as possible, including data for respondents who reported more than one race and/or ethnicity category.”*

Timeline

Agencies have until September 27, 2025 to develop an Action Plan on Race and Ethnicity.

“Agencies do not need to wait for their Action Plans to be complete to start implementing the revisions wherever possible. To improve transparency, agencies must make their Action Plans publicly available upon submission to OMB.”

Agencies have until March 2029 to fully implement revisions.

“Most programs will be able to, and should, implement revisions sooner than the five-year deadline for compliance. Certain programs that involve interconnected data across multiple agencies or offices, or that rely on data collected and provided by non-Federal entities, may take longer to implement than programs like statistical surveys, but all programs are required to bring their collections into compliance within the five-year implementation period.”

Questions?

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For more information, you can view the complete guidance in the Federal Register at <https://www.federalregister.gov/documents/2024/03/29/2024-06469/revisions-to-ombs-statistical-policy-directive-no-15-standards-for-maintaining-collecting-and>.