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# Re-counting race and ethnicity: the distribution of racial identities when MENA and Hispanic/Latino are minimum reporting categories

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*This paper was funded by a sub-grant from the National Health Law Program, a health advocacy non-profit.*

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The Office of Management and Budget (OMB) establishes the federal government's standards for collecting data on the race and ethnicity of all persons residing in the United States. OMB's 1997 Statistical Policy Directive No. 15, Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15), allows all persons to be classified by ethnicity and race with separate minimum reporting categories for both classifications. OMB's SPD 15 is the most significant federal factor affecting the way Americans' racial and ethnic identities are counted. It governs information in the largest federal survey datasets, such as the Census, the Current Population Survey, and the American Community Survey, and administrative datasets, such as the Department of Health and Human Services (HHS) Health Insurance Marketplace and Medicaid enrollment data.

This paper examines how proposed changes to SPD 15 will affect self-selected racial and ethnic identities of persons in Marketplace and Medicaid enrollment data. To the extent that the proposed changes in SPD 15 will substantively alter self-selected race and ethnicity, then the proposed changes will also alter our understanding of racial and ethnic disparities in health care access and other outcomes. Health care programs, plans, and providers must understand the ways that different racial and ethnic groups respond to race and ethnicity data collection to appropriately review and analyze the resulting data.

## Using SPD 15 to Measure Race and Ethnicity on Federal Forms

Both race and ethnicity are self-selected on federal forms. SPD 15 currently includes two minimum categories for ethnicity: Hispanic (or Latino) and Not Hispanic (or Not Latino).<sup>1</sup> (See **Table 1.**) SPD 15 currently offers five minimum categories for race: American Indian or Alaska Native;<sup>2</sup> Asian; Black or African American; Native Hawaiian or Other Pacific Islander; and White. Many federal forms allow respondents to select multiple racial categories, or to select "some other race" if their identified race or ethnicity is not available. For example, starting in 2005, the decennial Census and American Community Survey (ACS) include a residual minimum reporting racial category, that is, "some other race" category. The single,

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streamlined Health Insurance Marketplace application also includes an “other” racial category.<sup>3</sup> As shown below, the distribution of racial identities among Latinx individuals is sensitive to whether the dataset has the “some other race” category.<sup>4</sup>

**Table 1. Comparison of current and proposed changes to SPD 15**

Current SPD 15	Proposed changes to SPD 15
<p>1. Ethnicity. Select one.</p> <ul style="list-style-type: none"> <li>A. Hispanic or Latino</li> <li>B. Not Hispanic or Not Latino</li> </ul> <p>2. Race. Select all that apply.</p> <ul style="list-style-type: none"> <li>A. White</li> <li>B. Black or African American</li> <li>C. Native American or Alaska Native</li> <li>D. Asian</li> <li>E. Native Hawaiian or other Pacific Islander</li> <li>F. <i>Some other race.</i> <i>(Census Bureau is the only federal agency allowed to use this option.)</i></li> </ul>	<p>Race and ethnicity. Select all that apply.</p> <ul style="list-style-type: none"> <li>A. White</li> <li>B. Black or African American</li> <li>C. Native American or Alaska Native</li> <li>D. Asian</li> <li>E. Native Hawaiian or other Pacific Islander</li> <li>F. Hispanic or Latino</li> <li>G. Middle Eastern or North African</li> </ul> <p>Include national origin questions for each race</p> <ul style="list-style-type: none"> <li>H. <i>Some other race.</i> <i>(Census Bureau is the only federal agency allowed to use this option.)</i></li> </ul>
<p>Health Insurance Marketplace Single Streamlined Application</p>	
<p>1. If Hispanic/Latino, ethnicity (optional, select all that apply)</p> <ul style="list-style-type: none"> <li>A. Mexican</li> <li>B. Mexican American</li> <li>C. Chicano/a</li> <li>D. Cuban</li> <li>E. Puerto Rican</li> <li>F. Other (Hispanic or Latino ethnic group)</li> </ul> <p>2. Race (optional, check all that apply)</p> <ul style="list-style-type: none"> <li>A. White</li> <li>B. Black or African American</li> <li>C. Native American or Alaska Native.</li> <li>D1. Asian Indian</li> <li>D2. Chinese</li> <li>D3. Filipino</li> <li>D4. Japanese</li> <li>D5. Korean</li> <li>D6. Vietnamese</li> <li>D7. Other Asian</li> </ul> <ul style="list-style-type: none"> <li>E1. Native Hawaiian</li> <li>E2. Guamanian or Chamorro</li> <li>E3. Samoan</li> <li>E4. Other Pacific Islander</li> <li>F. <i>Other</i></li> </ul>	

In 2023, OMB proposed changes to SPD 15 that include: i) collecting race and ethnicity information using a single combined question format; ii) adding “Middle Eastern or North African” (MENA) as a new minimum reporting category; and, iii) including national origin identifiers within each race and ethnic category (*e.g.*, under the category of “Hispanic or Latino,” the respondent can also check “Venezuelan,” “Salvadorian,” “Puerto Rican” and others). Racial and ethnic identities continue to be self-identified and respondents may select multiple racial or ethnic categories. The proposed changes to SPD 15 will create seven minimum categories for race and ethnicity: Native American; Asian; Black or African American; Native Hawaiian or Other Pacific Islander; White; Hispanic or Latino; and Middle Eastern or North African (MENA). The MENA countries of origin include: 1) *North Africa – Arab* (Algeria, Comoros, Djibouti, Egypt, Libya, Mauritania, Morocco, Somalia, Sudan, Tunisia); 2) *Western Asia – Arab* (Bahrain, Iraq, Jordan, Kuwait, Lebanon, Oman, Palestine, Qatar, Saudi Arabia, Syria, United Arab Emirates, Yemen); 3) *Western Asia – Non-Arabs* (Iran, Israel, and Turkey); and, 4) *Transnational Communities* (Assyrians/Chaldeans, Kurds, Berber/Amazigh).<sup>5</sup> Hispanic or Latino includes persons residing in the U.S. with ancestral origins from other American countries with a Spanish-speaking culture.<sup>6</sup>

The seven minimum reporting racial and ethnic categories are an assemblage of racial groups (White, Black, Native American, Native Hawaiian or Other Pacific Islander), language-based ethnic groups (Hispanic or Latino), a continental ancestral origin group (Asian), and ethnic religious groups (Arabs and Muslims from Western Asia and North Africa and Israeli immigrants who may be neither Arab nor Muslim). Latinx individuals may belong to any of the racial groups or self-identify themselves as a separate racial group. Spanish colonization of American countries imposed a common language on people with ancestral origins in Africa and Europe, as well as Indigenous Americans. During the 1800s, many of these Spanish language countries also had immigrants from China and India. Similarly, MENA individuals may self-identify as Black, White, Asian, or neither. Accordingly, increasing the number of minimum reporting groups from 5 to 7 will cause changes in the distribution of self-identified racial categories.

Marketplace and Medicaid enrollment data are reported following current SPD 15 guidelines, although there are some modified practices. First, the ethnicity and race questions are optional for Marketplace and Medicaid applicants to report, and 30 percent of Marketplace enrollees and 19 percent of Medicaid enrollees have missing ethnicity and race information.<sup>7</sup> The missing information is sometimes imputed using self-selected ethnic and racial categories from the decennial Census – a source that conforms to SPD 15.<sup>8</sup> Second, on the Marketplace application, the Asian racial category is decomposed into 7 national origin groups (in Table 1: D1 – D7); the Native Hawaiian or Other Pacific Islander racial category is decomposed into 4 groups (in Table 1: E1 – E4); and, the Hispanic or Latino ethnicity category includes 3 identifiers for persons of Mexican origin, as well as specific identifiers for Cubans and Puerto

Ricans. It is straightforward to aggregate these groups into the broader categories required by SPD 15, allowing the data to be compared to other federal datasets. Finally, Marketplace and Medicaid data include “other” as a racial category. This is dissimilar to datasets such as the Current Population Survey and, as we report below, has a substantive impact on persons self-selecting Hispanic or Latino and white-only identities.

## Identity Distributions: Comparing Current and Proposed Changes to SPD 15

The Current Population Survey (CPS) has data sufficient to allow us to examine the probable changes in the distribution of self-selected racial and ethnic categories when the number of minimum reporting categories increases from 5 to 7. The CPS is a nationally representative monthly survey of U.S. households, jointly sponsored by the Census Bureau and the Bureau of Labor Statistics. The Annual Social and Economic Supplement (ASEC) of the CPS surveys 75,000 households during March of each year. In addition to data on race and ethnicity, starting in 1994 the CPS-ASEC also began collecting data on the birthplace (“national origin”) of each respondent and both parents. This breakdown provides more granular details on whether the individual was born in the U.S. or immigrated to the U.S. Further, starting in 2003, “Asian” and “Hawaiian/Pacific Islander” were separate minimum response categories and individuals were allowed to select membership in multiple racial groups.

Using the CPS-ASEC for 2003 – 2022, the racial and ethnic composition of the U.S. population is reported in **Table 2**. The first three columns present the racial and ethnic composition of the U.S. when self-identification follows the current SPD 15 guidelines. Hispanic/Latino and MENA are subsumed within the SPD 15 five racial categories; hence, the totals for these columns add up to more than 100 percent. The next three columns present data for the racial and ethnic composition of the U.S. population when MENA and Hispanic/Latino are separate minimum reporting categories. In this case, per the proposed changes to SPD 15, Hispanic/Latino and MENA are identified separately from the other groups. The totals for these columns sum to 100 percent. The data in Table 2 may underestimate MENA populations since identification of ancestral origin is limited to respondents’ and parents’ place of birth, that is, 1<sup>st</sup> and 2<sup>nd</sup> generation MENA individuals.

Social, political, and economic circumstances may affect racial and ethnic self-identification and thus what the data show. For example, Arab and Muslim self-identification as white declined in response to U.S. government treatment of these citizens after the September 11 terror attacks.<sup>9</sup> Similarly, African American self-identification as mixed-race rather than as Black-only increased with a state’s decrease in white antagonism toward African Americans.<sup>10</sup> The Great Recession of December 2007 – June 2009 and the COVID crisis that started in March 2020 are also political economic events that might alter incentives to self-identify with

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particular minimum reporting racial and ethnic groups. Accordingly, the data in Table 2 are separated into three periods: Pre-Great Recession, the years 2003 – 2008; Post-Great Recession, the years 2009-2019; and, Post-COVID, 2020-2022. Self-identification also differs by nativity, as immigrants have origins in countries where the social constructions of race and ethnicity differ from processes in the U.S. Table 2 includes separate panels of all persons, U.S.-born<sup>1</sup> persons, and immigrants.

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<sup>1</sup> U.S.-born includes all persons whereby both parents were American citizens, even if the person was born abroad. U.S.-born is preferred to “native-born,” since the latter may be confused with Native-American.

**Table 2. Racial distribution of U.S. population by period, ethnicity, and nativity: impact of Hispanic/Latino and MENA as minimum reporting groups**

	Current SPD 15 guidelines			Proposed changes to SPD 15		
	2003-08	2009-19	2020-22	2003-08	2009-19	2020-22
<b>All (N)</b>	<b>948,104</b>	<b>1,612,780</b>	<b>373,272</b>	<b>948,104</b>	<b>1,612,780</b>	<b>373,272</b>
White-only	0.814	0.790	0.772	0.687	0.643	0.611
Black-only	0.118	0.124	0.129	0.114	0.117	0.120
Native						
American-only	0.008	0.010	0.011	0.006	0.007	0.008
Asian-only	0.043	0.055	0.063	0.043	0.053	0.061
Pacific						
Islander-only	0.002	0.003	0.004	0.002	0.003	0.003
Black-mix	0.003	0.006	0.009	0.003	0.005	0.007
Native						
American-mix	0.008	0.007	0.006	0.007	0.005	0.004
Asian Pacific-mix	0.003	0.004	0.005	0.002	0.003	0.004
Hispanic/Latino	0.130	0.155	0.173	0.130	0.155	0.173
MENA	0.007	0.010	0.010	0.007	0.009	0.009
<b>U.S.-born (N)</b>	<b>812,858</b>	<b>1,352,256</b>	<b>312,427</b>	<b>812,858</b>	<b>1,352,256</b>	<b>312,427</b>
White-only	0.839	0.822	0.807	0.771	0.734	0.703
Black-only	0.124	0.129	0.132	0.121	0.124	0.126
Native						
American-only	0.008	0.010	0.012	0.006	0.008	0.009
Asian-only	0.013	0.018	0.024	0.013	0.017	0.023
Pacific						
Islander-only	0.002	0.003	0.003	0.001	0.002	0.002
Black-mix	0.004	0.007	0.009	0.003	0.005	0.008
Native						
American-mix	0.009	0.007	0.007	0.008	0.006	0.005
Asian Pacific-mix	0.003	0.004	0.006	0.002	0.003	0.005
Hispanic/Latino	0.072	0.097	0.116	0.072	0.097	0.116
MENA	0.002	0.003	0.004	0.002	0.003	0.003
<b>Immigrant</b>	<b>135,246</b>	<b>260,524</b>	<b>60,845</b>	<b>135,246</b>	<b>260,524</b>	<b>60,845</b>
White-only	0.666	0.621	0.595	0.187	0.158	0.142
Black-only	0.085	0.100	0.113	0.071	0.077	0.089
Native						
American-only	0.008	0.009	0.010	0.001	0.001	0.001
Asian-only	0.225	0.251	0.260	0.221	0.245	0.255
Pacific						
Islander-only	0.007	0.008	0.008	0.006	0.006	0.006

Black-mix	0.002	0.005	0.007	0.001	0.001	0.002
Native American-mix	0.004	0.004	0.004	0.001	0.000	0.000
Asian Pacific-mix	0.002	0.002	0.004	0.001	0.001	0.002
Hispanic/Latino	0.475	0.466	0.464	0.475	0.466	0.463
MENA	0.037	0.045	0.041	0.037	0.044	0.040

Source: Author's calculations, CPS-ASEC 2003 – 2022.

The CPS-ASEC allowed individuals who self-identified as ethnically MENA and Latinx to also self-select their racial identity. **Table 3** shows how Latinx and MENA individuals self-selected a racial identity during the same period.

**Table 3. Racial distribution of Hispanic/Latino and MENA by period and nativity**

	Hispanic/Latino			MENA		
	2003-08	2009-19	2020-22	2003-08	2009-19	2020-22
All (N)	137,541	282,938	69,642	5,746	13,106	2,928
White-only	0.928	0.900	0.886	0.891	0.813	0.835
Black-only	0.030	0.044	0.048	0.052	0.116	0.088
Native American-only	0.017	0.021	0.022	0.001	0.003	0.003
Asian-only	0.004	0.009	0.011	0.051	0.058	0.057
Pacific Islander-only	0.002	0.004	0.004	0.000	0.002	0.002
Black-mix	0.005	0.010	0.013	0.002	0.004	0.003
Native American-mix	0.010	0.010	0.011	0.001	0.001	0.002
Asian Pacific-mix	0.003	0.003	0.005	0.003	0.003	0.010
Hispanic/Latino				0.014	0.021	0.025
MENA	0.001	0.001	0.001			
<b>U.S.-born(N)</b>	<b>67,683</b>	<b>150,684</b>	<b>39,527</b>	<b>1,601</b>	<b>3,529</b>	<b>902</b>
White-only	0.914	0.883	0.870	0.921	0.878	0.848
Black-only	0.035	0.050	0.051	0.039	0.056	0.067
Native American-only	0.019	0.024	0.025	0.001	0.005	0.002
Asian-only	0.005	0.011	0.014	0.029	0.043	0.053
Pacific Islander-only	0.003	0.004	0.004	0.000	0.002	0.001
Black-mix	0.007	0.011	0.015	0.003	0.008	0.004
Native American-mix	0.013	0.012	0.015	0.002	0.002	0.005
Asian Pacific-mix	0.004	0.005	0.006	0.005	0.006	0.021
Hispanic/Latino				0.025	0.053	0.046
MENA	0.001	0.002	0.001			
<b>Immigrant (N)</b>	<b>69,858</b>	<b>132,254</b>	<b>30,115</b>	<b>4,145</b>	<b>9,577</b>	<b>2,026</b>
White-only	0.941	0.918	0.906	0.880	0.789	0.830
Black-only	0.026	0.037	0.044	0.056	0.138	0.097
Native American-only	0.015	0.017	0.018	0.001	0.002	0.003



Asian-only	0.004	0.006	0.007	0.059	0.064	0.059
Pacific Islander-only	0.002	0.004	0.003	0.001	0.002	0.002
Black-mix	0.003	0.008	0.011	0.001	0.002	0.002
Native American-mix	0.008	0.008	0.007	0.000	0.001	0.001
Asian Pacific-mix	0.002	0.002	0.003	0.002	0.002	0.006
Hispanic/Latino				0.010	0.008	0.015
MENA	0.001	0.001	0.001			

Source: Author's calculations, CPS-ASEC 2003 – 2022.

### Impact of Distinct MENA and Hispanic/Latino Response Options

The proposed changes to SPD 15 are likely to reduce the percentage of Americans identifying as white-only, with less impact on the self-identification of other racial groups, including individuals identifying as mixed-race. Additionally, there is likely to be a greater impact among immigrants than among individuals born in the U.S.

#### *White-only population declines further when MENA and Hispanic/Latino are response options*

When given the option to identify as MENA or Hispanic/Latino in addition to the current SPD 15 categories, less individuals choose to identify as white-only. Consider 2003-2022. Under the current SPD 15 guidelines, the number of people identifying as white-only declines 4 percent, from 81 percent to 77 percent. Using the proposed changes to the SPD 15 guidelines, white-only falls 8 percent, from 69 percent to 61 percent.

For all persons, the 2020-2022 white-only population share declines from about 77 percent under current SPD 15 guidelines to 61 percent when Hispanic/Latino and MENA are included as options. Comparatively, the Black-only population share of the national population declines from 12.9 percent to 12 percent; the Native American-only population decreases from 1.1 percent to 0.8 percent; the Asian-only population falls from 6.3 percent to 6.1 percent; and, the Pacific Islander-only population drops from 0.4 to 0.2 percent.

A small proportion of the white-only decline is related to the increase in mixed-race persons.<sup>11</sup> Under the current SPD 15 guidelines, mixed-race persons were 1.4 percent of all persons in 2003-2008, 1.7 percent in 2009-2019, and 2.1 percent in 2020-2022. With the addition of Hispanic/Latino and MENA options, mixed-race persons were 1.2 percent of all persons in 2003-2008, 1.3 percent in 2009-2019, and 1.6 percent in 2020-2022. Looking at more specific mixed-race identifications (*e.g.* Black and any other racial category), the changes from 2003-2022 are minimal under either the current SPD 15 guidelines or the proposed changes.

### Responses to race and ethnicity questions differ by nativity

Immigrant racial self-identification differs from racial self-identification among U.S.-born Americans. Among U.S.-born persons during 2020-2022, about 81 percent identify as white-only under current SPD 15 guidelines. But, with the proposed additions of MENA and Hispanic/Latino as response options, white-only representation among U.S.-born persons is 70 percent during the same period. Among immigrants, the reduction in individuals identifying as white-only drops much more significantly. During 2020-2022, about 60 percent of immigrants surveyed identify as white-only under current SPD 15 guidelines. With the addition of MENA and Hispanic/Latino as response options, the white-only representation among immigrants drops to just 14 percent.

Identification with other racial groups also differs among MENA-identified and Latinx-identified populations. MENA-identified immigrants are 4 percentage points (2003-2008), 9 percentage point (2009-2019), and 2 percentage points (2020-2022) less likely than U.S.-born MENA individuals to identify as white-only. (See Table 3). White-only self-selection among U.S.-born MENA individuals also declined from 92 percent to 88 percent before and after the Great Recession and fell to 85 percent after COVID. Over the same period of time, there has been some increase in identification with non-white racial groups. During 2020-2022, almost 7 percent and 10 percent of U.S.-born and immigrant MENA populations, respectively, self-identify as Black-only; this is a 3 percentage point increase among U.S.-born MENA individuals and a 4 percentage point increase among MENA immigrants between 2003-2008 and 2020-2022. The mixed race percentage grew from 1 percent to 3 percent among U.S.-born MENA individuals and from 0.3 percent to 0.9 percent among MENA immigrants.

Conversely, Latinx immigrants are 3 – 4 percentage points more likely than U.S.-born Latinx individuals to identify as white-only. Nevertheless, during 2020-2022, 90.6 percent of Latinx immigrants and 87 percent of U.S.-born Latinx self-identify as white-only. During the most recent years, 5.1 percent and 4.4 percent of U.S.-born and immigrant Latinx populations, respectively, self-identify as Black-only; both are nearly 2 percentage points higher than during 2003-2008. Altogether, the mixed race population also increased from 2.4 percent to 3.6 percent (U.S.-born) and from 1.3 percent to 2.1 percent (immigrant).

### **Impact of the “some other race” category on Latinx racial identity**

The number of Latinx individuals self-identifying as white-only is substantially greater when respondents cannot select “other” or “some other race” as a response. (As a reminder, the CPS-ASEC does not allow respondents to select “some other race.”) For example, the American Community Survey, which does have a “some other race” option, shows that about 60 percent of Latinx individuals self-identify as white, but this number is 87 percent when taken from the CPS-ASEC for 2020-2022.<sup>12</sup> The higher-than-average percent of Latinx individuals self-identifying as white within the CPS-ASEC occurs for several reasons:

- given the inability to select “some other race,” some persons select white-only;
- given the inability to select “some other race,” some respondents do not respond to the racial identity question and their race is edited, or imputed, by the survey.<sup>13</sup> For 2020-2022, 31 percent of all Latinx respondents, 26 percent of U.S.-born Latinx respondents, and 36 percent of immigrant Latinx respondents in the CPS-ASEC have an edited racial identity (see **Table 4**); and,
- edited identity reduces the fraction of white-only persons: when all Latinx respondents select a race, 91 percent select white-only; when race is edited, 84 percent are white-only. The Black-only share is 3.7 percent (self-select) and 7.2 percent (edited). Allocation also increases Native American-only, Asian-only, Pacific-only, Black-mix, Native American-mix, and Asian Pacific-mix. See Table 4 for a breakdown of edited and self-selected racial and ethnic identities by Latinx respondents.

**Table 4** shows the impact of editing the racial identity of Latinx respondents to the CPS-ASEC survey.

**Table 4. Latinx respondents: race by self-selected and edited identity**

N	All		U.S.-born		Immigrant	
	Self-Selected	Edited	Self-Selected	Edited	Self-Selected	Edited
White-only	0.906	0.841	0.888	0.822	0.932	0.860
Black-only	0.037	0.072	0.041	0.076	0.030	0.068
Native American-only	0.020	0.026	0.024	0.030	0.016	0.023
Asian-only	0.005	0.024	0.006	0.034	0.003	0.015
Pacific-only	0.002	0.008	0.003	0.008	0.001	0.008
Black-mix	0.015	0.010	0.017	0.010	0.011	0.010
Native American-mix	0.011	0.011	0.015	0.013	0.006	0.009
Asian Pacific-mix	0.004	0.007	0.006	0.007	0.001	0.006
Other	0.000	0.000	0.000	0.000	0.000	0.001
MENA	0.002	0.001	0.002	0.001	0.002	0.001

## Discussion and recommendations

The suggested changes to SPD 15 will primarily impact the visibility and understanding of non-white and non-U.S.-born Americans in federal data. Expanding race and ethnicity response options and allowing respondents to select multiple races and ethnicities will facilitate a crosswalk between new and old datasets that have different minimum reporting ethnic and racial categories. Allowing multiple self-selected categories is important; otherwise, some racial

and ethnic minorities, *e.g.*, Black Latinx and Black MENA individuals, might be rendered less visible.

Including Hispanic or Latino and MENA as minimum reporting categories will likely reduce the fraction of persons self-identifying as white-only. However, these categories will also have a small impact on the fraction of persons identifying as Black-only. We are not certain of the extent to which an increase in mixed race categories will offset the reductions in the single race categories.

Immigrants are driving these changes. More than 70 percent of immigrants are Asian-only or Latinx compared to 14 percent of U.S.-born persons. With the addition of MENA and Latinx response options, and the removal of the “other” response option, the visibility of non-white immigrants increases in federal data.

These changes have significant implications for how CMS should collect and use demographic data in federal health insurance programs. The Marketplace application, as well as reporting of Medicaid data by states, should strictly adhere to the proposed changes to SPD 15. This will harmonize administrative and survey data with respect to ethnic and racial identification and allow for comparison with other federal datasets. Necessary changes include: eliminating the optional nature of ethnicity and race on applications; eliminating the “other” race category; and, establishing Latinx, Native American, and Asian and Pacific categories that have the same level of aggregation as the proposed changes to SPD 15. “Don’t know” and “refused to answer” may be added instead, preserving an individual’s option to not respond without obscuring their response in an “other” category. This will also likely reduce the need for edited or imputed data, which is less accurate for some non-white populations.<sup>14</sup>

Consideration must be given to the way that immigrants, Latinx and MENA individuals may respond differently to the expanded demographic question. Programs such as the Health Insurance Marketplace and state Medicaid programs should ensure that culturally-tailored explanations are provided as to the ability of individuals to identify with multiple race and ethnicity categories. Public education and explanations should be provided in multiple languages, should ensure that individuals responding to demographic questions understand the privacy and confidentiality protections that apply to information that they share. Explanations should be tailored to address the concerns that particular populations may have around sharing race and ethnicity information based on social, economic, and political factors.

Even with the proposed changes to SPD 15, it would be helpful to have an expansion in the demographic information captured in administrative datasets. Despite the ability to select multiple races and ethnicities, some individuals still choose not to respond. Socially-assigned

race may be more impactful than self-identified race for determining socioeconomic and health care outcomes.<sup>15</sup> Skin-shade is one correlate of socially-assigned race. More information on socially-assigned race will aide our quest to identify the causal sources of racial inequality in health and socioeconomic status.

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**ENDNOTES**

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<sup>1</sup> Initial Proposals For Updating OMB’s Race and Ethnicity Statistical Standards, 88 Fed. Reg. 5375 (Jan. 27, 2023), <https://www.federalregister.gov/documents/2023/01/27/2023-01635/initial-proposals-for-updating-ombs-race-and-ethnicity-statistical-standards> and see Table 1.

<sup>2</sup> The Office of Management and Budget uses “American Indian or Alaska Native.” This report uses “Native American” as a substitute.

<sup>3</sup> We reference the single, streamlined Health Insurance Marketplace application here because it uses a consistent race and ethnicity question format that includes more granular response options than given by the current SPD 15. It also includes a “some other race” category, which is not typical of all demographic data collections. Individuals may also apply to Medicaid using the Marketplace application; therefore, Medicaid data is also discussed. Individuals also apply for Medicaid using their state’s Medicaid application, which frequently uses different race and ethnicity response options than SPD 15’s minimum categories and the Marketplace application. See State Health Access Data Assistance Ctr., *Collection of Race, Ethnicity, Language Data on Medicaid Applications: New and Updated Information on Medicaid Data Collection Practices in the States, Territories, and D.C.* (Nov. 2022), [https://www.shvs.org/wp-content/uploads/2022/11/SHVS\\_Collection-of-Race-Ethnicity-Language-REL-Data-on-Medicaid-Applications.pdf](https://www.shvs.org/wp-content/uploads/2022/11/SHVS_Collection-of-Race-Ethnicity-Language-REL-Data-on-Medicaid-Applications.pdf). However, Medicaid data is reported to CMS using the SPD 15 guidelines for race and ethnicity. Medicare does not currently collect race and ethnicity information from Part A and B enrollees, but has adopted a race and ethnicity data collection question for Part C and D enrollees beginning in 2023 that is similar to the one used for the Health Insurance Marketplace. See *Model Individual Enrollment Request Form to Enroll in a Medicare Advantage Plan (Part C)*, Ctrs. for Medicare & Medicaid Servs. (2023), <https://www.cms.gov/files/document/cy-2023-model-ma-indiv-enrollment-request-form-0938-1378.pdf>.

<sup>4</sup> Throughout this paper, “Latinx” refers to the broader group of people with ethnic ties to Latin America or Latin American heritage. “Hispanic or Latino” is used when making specific reference to the terminology used in SPD 15.

<sup>5</sup> See U.S. Bureau of the Census, Middle East/North Africa (MENA) Reporting Category: Discussant comments by Helen Hatab Samhan (May 2022), <https://www2.census.gov/about/partners/cac/nac/meetings/2022-05/discussant-mena-reporting-category.pdf>.

<sup>6</sup> Brazilians, Spanish-speaking Belizeans, Filipinos, and Spanish-speaking persons from Non-Hispanic Caribbean countries are not counted as Hispanic or Latino by the federal government. Passel, Jeffrey S. and Jens Manuel Krogstad, *How a coding error provided a rare glimpse into Latino identity among Brazilians in the U.S.*, Pew Res. Ctr., (Apr. 19, 2023),

<https://www.pewresearch.org/short-reads/2023/04/19/how-a-coding-error-provided-a-rare-glimpse-into-latino-identity-among-brazilians-in-the-u-s/>.

<sup>7</sup> Lucy Chen, Aiden Lee, D. Keith Branham, Kenneth Finegold, Christie Peters, Melony E. Sorbero, Marc N. Elliott, Roald Euler, and Benjamin D. Sommers, Ofc. of Health Policy, U.S. Dep't of Health & Hum. Servs., HealthCare.gov Enrollment by Race and Ethnicity, 2015-2022, (Oct. 25, 2022),

<https://aspe.hhs.gov/sites/default/files/documents/c070089ad329eed43dcab36ca80d18f/aspe-oep-2022-race-ethnicity-marketplace.pdf>; Aubrey Limberg, U.S. Bureau of the Census, Missing Medicaid Data on Race/Ethnicity May Bias Health Research (Apr. 18, 2023), <https://www.census.gov/library/stories/2023/04/missing-medicaid-data-on-race-ethnicity-may-bias-health-research.html>.

<sup>8</sup> See Allen Fremont, Joel S. Weissman, Emily Hoch, and Marc N. Elliott, Rand Corp., *When Race and Ethnicity Data Are Lacking: Using Advanced Indirect Estimation Methods to Measure Disparities*, (2016), [http://www.rand.org/pubs/research\\_reports/RR1162.html](http://www.rand.org/pubs/research_reports/RR1162.html) for details on imputation.

<sup>9</sup> Patrick L. Mason and Andrew Matella, *Stigmatization and Racial Selection after September 11, 2001: Self-identity among Arab and Islamic Americans*, 3 IZA J. of Migration 20 (2014), <http://www.izajom.com/content/3/1/20>.

<sup>10</sup> Patrick L. Mason, *Not black-alone: the 2008 presidential election and racial self-identification among African Americans*, 44 Rev. of Black Political Economy 55 (2017), <https://journals.sagepub.com/doi/10.1007/s12114-017-9247-z>.

<sup>11</sup> In Tables 2 and 3, Black-mix refers to all persons who self-identify as Black and any other racial category. Native American-mix includes all persons who self-identify as Native American and any other non-black racial category. Asian-Pacific Islander mix includes all persons who self-identify as both Asian and Pacific Islander, or Asian and white, or Pacific Islander and white.

<sup>12</sup> A private communication from Manuel Pastor (Distinguished Professor, Sociology / American Studies & Ethnicity, Turpanjian Chair in Civil Society and Social Change, and Director, University of Southern California Equity Research Institute) indicates that 53 – 64 of Latinx self-identify as white using the 2000-2007 ACS, 66 – 70 self-identify as white using the 2008 – 2019 ACS, and 58 – 60 self-identify as white using the 2020-2021 ACS.

<sup>13</sup> For details on procedures for editing missing values, see U.S. Bureau of the Census, *Current Population Survey Design and Methodology Technical Paper 77* at 133-34 (Oct. 2019), <https://www2.census.gov/programs-surveys/cps/methodology/CPS-Tech-Paper-77.pdf>.

<sup>14</sup> See Limberg, *supra* note 3.

<sup>15</sup> Ryon J. Cobb, Courtney S. Thomas, Whitney N. Laster Pirtle, and William A. Darity, Jr., *Self-identified race, socially assigned skin tone, and adult physiological dysregulation: assessing multiple dimensions of "race" in health disparities research*, 2 SSM - Population Health 595 (Dec. 2016); Camra Phyllis Jones, Benedict I. Truman, Laurie D. Elam-Evans, Camille A. Jones, Clara Y. Jones, Ruth Jiles, Susan F. Rumisha, and Geraldine S. Perry, *Using "socially assigned race" to probe white advantages in health status*, 18 Ethnicity & Disease, 496 (2008); Kellee White, Jourdyn A. Lawrence, Nedelina Tchangalova, Shuo J. Huang, and Jason L. Cummings, *Socially-assigned race and health: a scoping review with global implications for population health equity*, 19 Int'l J. for Equity in Health (2020).