

**American Anthropological Association  
Response to OMB Directive 15:**

*Race and Ethnic Standards for Federal Statistics  
and Administrative Reporting  
(Sept 1997)*

**A Brief History of OMB Directive 15**

The Statistical Policy Division, Office of Information and Regulatory Affairs, of the Office of Management and Budget (OMB) determines federal standards for the reporting of "racial" and "ethnic" statistics. In this capacity, OMB promulgated Directive 15: Race and Ethnic Standards for Federal Statistics and Administrative Reporting in May, 1977, to standardize the collection of racial and ethnic information among federal agencies and to include data on persons of Hispanic origins, as required by Congress. Directive 15 is used in the collection of information on "racial" and "ethnic" populations not only by federal agencies, but also, to be consistent with national information, by researchers, business, and industry as well.

Directive 15 described four races (i.e., American Indian or Alaskan Native, Asian or Pacific Islander, Black, and White) and two ethnic backgrounds (of Hispanic origin and not of Hispanic origin). The Directive's categories allowed collection of more detailed information as long as it could be aggregated to the specified categories.

Directive 15 was not clear regarding whether the race or origins of persons was to be determined by self-identification or by others, e.g., interviewers. Research has shown substantial differences of racial/ethnic identification by these two methods.

Directive 15 noted the absence of "scientific or anthropological" foundations in its formulation. Directive 15 did not explain what was meant by "race" or "origin," or what distinguished these concepts. However, the race and ethnicity categories of the Directive are used in scientific research and the interpretation of the research findings is based often on the "variables" of race and ethnicity.

Since Directive 15 was issued 20 years ago, the United States population has become increasingly diverse. Criticism that the federal race and ethnic categories do not reflect the Nation's diversity led to a review of Directive 15. Formal review began in 1993 with Congressional hearings, followed by a conference organized at the request of OMB by the National Academy of Sciences. OMB then instituted an Interagency Committee for the Review of Racial and Ethnic Standards, and appointed a Research Subcommittee to assess available research and conduct new research as a basis for possible revision of the Directive.

Among the guidelines for the review, OMB stated that ". . . the racial and ethnic categories set forth in the standard should be developed using appropriate scientific methodologies, including the social sciences." The guidelines noted, too, that "the racial

and ethnic categories set forth in the standards should not be interpreted as being primarily biological or genetic in reference. Race and ethnicity may be thought of in terms of social and cultural characteristics as well as ancestry." However, the distinction between the concepts of race and ethnicity was, again, not clarified.

The recommendations from the Interagency Committee were published by OMB in the Federal Register July 9, 1997 (Vol. 62, No. 131: 36847-36946), with a request for public comment by September 8, 1997. The recommendations included (1) maintaining the basic racial and ethnic categories from the 1977 Directive; and (2) collecting race and ethnicity data through two separate questions (p. 36943), with ethnicity collected first. The minimum designations for "race" were: "American Indian or Alaskan Native," "Asian or Pacific Islander," "Black or African-American," and "White." The minimum designations for "ethnicity" were: "Hispanic origin," or "not of Hispanic origin." To account for multiple races, OMB recommended that respondents be allowed to report "More than one race."

### **History and Problems with the Concept of "Race": A Biological Perspective**

Anthropologically speaking, the concept of race is a relatively recent one. Historically, the term "race" was ascribed to groups of individuals who were categorized as biologically distinct. Rather than developing as a scientific concept, the current notion of "race" in the United States grew out of a European folk taxonomy or classification system sometime after Columbus sailed to the Americas. Increased exploration of far-away lands with people of different custom, language, and physical traits clearly contributed to the developing idea. In these pre-Darwinian times the observed differences--biological, behavioral and cultural--were all considered to be products of creation by God. It was in this intellectual climate that the perceived purity and immutability of races originated. Perceived behavioral features and differences in intellect were inextricably linked to race and served as a basis for the ranking, in terms of superiority, of races.

Early natural history approaches to racial classification supported these rankings and the implications for behavior. For example, in the 18th century, Carolus Linneaus, the father of taxonomy and a European, described American Indians as not only possessing reddish skin, but also as choleric, painting themselves with fine red lines and regulated by custom. Africans were described as having black skin, flat noses and being phlegmatic, relaxed, indolent, negligent, anointing themselves with grease and governed by caprice. In contrast, Europeans were described as white, sanguine, muscular, gentle, acute, inventive, having long flowing hair, blue eyes, covered by close vestments and governed by law.

In the 1800s, the first "scientific" studies of race attempted to extract the behavioral features from the definition of race. However, racist interpretation remained. For example the origin of racial variation was interpreted as degeneration of the original "Caucasian" race (the idea of a Caucasian race is based on the belief that the most "perfect" skulls came from the Caucasus Mountains). Degeneration explained the development of racial differences and racial differences explained cultural development. Biology and behavior

were used to gauge the degree of deterioration from the original race. Measures of intellect were an important part of these early studies. In some cases, the degree of facial prognathism, bumps on the skull as interpreted by phrenology, cranial index, and cranial capacity were used as measures of intelligence. IQ is just the latest in the list of these so-called "definitive" features used to rank races.

The clearest data about human variation come from studies of genetic variation, which are clearly quantifiable and replicable. Genetic data show that, no matter how racial groups are defined, two people from the same racial group are about as different from each other as two people from any two different racial groups.

One of the basic principles about genetic transmission in families is that different variants are transmitted to different offspring independently. The more generations of mixing, the more likely such heterogeneity in geographic origin of genes within the same person will be. Fixed sets of traits are not transmitted across generations as many people assume. Rules like the "one drop of blood" rule show clearly how vague and social, rather than biological, are categorical terms for people.

Modern humans (*Homo sapiens*) appear to be a fairly recent and homogenous species. Regardless of ancestral geographic origins, humans maintain a high degree of similarities from a biological perspective. Admixture, even among and between highly isolated populations, has resulted in widespread, worldwide distribution of genes and thus human variation.

It is because people often share cultural identity and geographic ancestry that "race" or a system of terms for grouping people carries some information that can be useful for biomedical purposes (as in assigning resources for disease screening). For example, sickle cell hemoglobin is a health risk associated with black or African-descended populations and PKU or phenylketonuria is a health risk associated with white or European-descended populations. Despite being loaded with the historical or colloquial connotations, such terminology may in practice be about as effective as any other questionnaire-based way to define categories of people that capture at least limited biological outcomes.

"Race" as a concept is controversial because of the numerous instances in human history in which a categorical treatment of people, rationalized on the grounds of biology-like terms, have been used. Common examples of this include arguments about which "race" is more intelligent, better at mathematics or athletics, and so on. The ultimate use of categorical notions of race have occurred to achieve political ends, as in the Holocaust, slavery, and the extirpation of American Indian populations, that, while basically economic in motivation, has received emotional support and rationale from biological language used to characterize groups. The danger in attempting to tie race and biology is not only that individuals are never identical within any group, but that the physical traits used for such purposes may not even be biological in origin.

The American Anthropological Association recognizes that classical racial terms may be useful for many people who prefer to use proudly such terms about themselves. The Association wishes to stress that if biological information is not the objective, biological-sounding terms add nothing to the precision, rigor, or factual basis of information being collected to characterize the identities of the American population. In that sense, phasing out the term "race," to be replaced with more correct terms related to ethnicity, such as "ethnic origins," would be less prone to misunderstanding.

### **Social and Cultural Aspects of "Race" and "Ethnicity"**

Race and ethnicity both represent social or cultural constructs for categorizing people based on perceived differences in biology (physical appearance) and behavior. Although popular connotations of race tend to be associated with biology and those of ethnicity with culture, the two concepts are not clearly distinct from one another.

While diverse definitions exist, ethnicity may be defined as the identification with population groups characterized by common ancestry, language and custom. Because of common origins and intermarriage, ethnic groups often share physical characteristics which also then become a part of their identification--by themselves and/or by others. However, populations with similar physical appearance may have different ethnic identities, and populations with different physical appearances may have a common ethnic identity.

OMB Directive 15 views race and ethnicity as distinct phenomena and appropriate ways to categorize people because both are thought to identify distinct populations. Although this viewpoint may capture some aspects of the way most people think about race and ethnicity, it overlooks or distorts other critical aspects of the same process.

First, by treating race and ethnicity as fundamentally different kinds of identity, the historical evolution of these category types is largely ignored. For example, today's ethnicities are yesterday's races. In the early 20th century in the US, Italians, the Irish, and Jews were all thought to be racial (not ethnic) groups whose members were inherently and irredeemably distinct from the majority white population. Today, of course, the situation has changed considerably. Italians, Irish, and Jews are now seen as ethnic groups that are included in the majority white population. The notion that they are racially distinct from whites seems far-fetched, possibly "racist." Earlier in the 20th century, the categories of Hindu and Mexican were included as racial categories in the Census. Today, however, neither would be considered racial categories.

Knowing the history of how these groups "became white" is an integral part of how race and ethnicity are conceptualized in contemporary America. The aggregated category of "white" begs scrutiny. It is important to keep in mind that the American system of categorizing groups of people on the basis of race and ethnicity, developed initially by a then-dominant white, European-descended population, served as a means to distinguish and control other "non-white" populations in various ways.

Second, by treating race and ethnicity as an enduring and unchanging part of an individual's identity, OMB and the Census ignore a fundamental tension and ambiguity in racial and ethnic thinking. While both race and ethnicity are conceptualized as fixed categories, research demonstrates that individuals perceive of their identities as fluid, changing according to specific contexts in which they find themselves.

Third, OMB Directive 15, Census and common sense treat race and ethnicity as properties of an individual, ignoring the extent to which both are defined by the individual's **relation** to the society at large. Consider, for example, the way that racial and ethnic identity supposedly "predict" a range of social outcomes. The typical correlation is that by virtue of being a member of a particular racial or ethnic group, imprisonment, poor health, poverty, and academic failure are more likely. Such an interpretation, while perhaps statistically robust, is structurally and substantively incomplete because it is not the individual's association with a particular racial or ethnic group that predicts these various outcomes but the attribution of that relationship by others that underlies these outcomes. For instance, a person is not more likely to be denied a mortgage because he or she is black (or Hispanic or Chinese), but because another person **believes** that he or she is black (or Hispanic or Chinese) and ascribes particular behaviors with that racial or ethnic category.

Current OMB Directive 15 policy and federal agency application of the Directive that does not take into account the complexities of racial and ethnic thinking is likely to create more problems than it resolves. Racial and ethnic categories are marked by both expectations of fixity and variation, both in historical and individual terms. Attempts to "hone" racial categories by expanding or contracting the groups listed in Directive 15 and on the Census form or by reorganizing the order in which questions are posed, will continue to miss important aspects of how people actually think about race and ethnicity. Similarly, treating race as an individual rather than relational property almost certainly compromises the value of the data collected. Finally, by ignoring the differences between self- and other- strategies for identification, Directive 15 and the Census application creates a situation where expectations about the nature of the data collected are violated by the way most people use common sense to interpret those same questions.

### **Overlap of the Concepts of Race, Ethnicity and Ancestry**

A basic assumption of OMB Directive 15 is that persons who self-identify or identify others by race and ethnicity understand what these concepts mean and see them as distinct. Recent research by the US Bureau of Census and other federal agencies, supported by qualitative pretesting of new race and ethnicity questions and field tests of these new question formats, has demonstrated that for many respondents, the concepts of race, ethnicity and ancestry are not clearly distinguished. Rather, respondents view race, ethnicity and ancestry as one and the same.

It should be pointed out that the race and ethnicity categories used by the Census over time have been based on a mixture of principles and criteria, including national origin, language, minority status and physical characteristics (Bates, et al, 1994.) The lack of

conceptual distinction discussed below is not exclusive to respondents, but may represent misunderstandings about race and ethnicity among the American people. Hahn (1992) has called for additional research to clarify the popular uses of these concepts.

The following outlines some of the evidence for the lack of clear distinctions between the concepts:

First, respondent definitions of the concepts. Cognitive pretesting for the Race and Ethnicity Targeted Test and the Current Population Survey Race Supplement suggest that, except for some college-educated respondents who saw the terms as distinct, respondents define all of the concepts in similar terms. Gerber and de la Puente (1996) found that respondents tended to define race in terms of family origins. Thus, common definitional strategies included: "your people," "what you are," and "where your family comes from." These concepts were invoked also to define the term "ethnic group" when it appeared in the same context. Many respondents said that "ethnic group" meant "the same thing" as "race." In subsequent discussions, the term "ethnic race" was frequently created by respondents as a label for the global domain. McKay and de la Puente (1995) found, too, that respondents did not distinguish between race and ethnicity, and concluded that many respondents are unfamiliar with the term "ethnicity." For example, several respondents assumed that a question containing the term "ethnicity" must be asking about the "ethical" nature of various groups. They concluded that the terms "race," "ethnicity," "ancestry" and "national origin . . . draw on the same semantic domain."

Second, perceived redundancy of race and ethnicity questions. In most Federal data collections, Hispanic origin is defined as an "ethnicity" and is collected separately from "race." In most recent tests, the Hispanic origin question precedes the race question. Both Hispanic and non-Hispanic respondents tend to treat the two questions as asking for essentially the same information.

For example, when Hispanic and non-Hispanic respondents are asked what the Hispanic ethnicity question means, they often say that it is asking about "race." Respondents often comment on this perceived redundancy, and wonder aloud why the two questions are separate. Non-Hispanic respondents attempt to answer the ethnicity question by offering a race-based term, such as "Black" or "White." (McKay and de la Puente, 1995.)

In addition, many Hispanic respondents regard the term "Hispanic" as a "race" category, defined in terms of ancestry, behavior as well as physical appearance (Gerber and de la Puente, 1996; Rodriguez and Corder-Guzman, 1992; Kissim and Nakamoto, 1993). They therefore tend to look for this category in the race question, and when they do not find it there, they often write it in to a line provided for the "some other race" category. More than 40% of self-identified Hispanics have not specified a race or ethnic category in the 1980 or 1990 Census. Census Bureau research has shown that over 97% of the 10 million persons who reported as "Other race" in 1990 were Hispanic (U.S. Census Bureau, 1992.)

Third, multiethnic and multiracial identifications are frequently not distinguished. Some respondents who identify as "multiracial" offer only ethnic groups to explain their

backgrounds. For example, McKay et al. (1996) found that some individuals who defined themselves as "multiracial" offered two ethnicities, such as "German and Irish" as an explanation. The authors concluded that such reporting "presents the overlapping of the semantic categories of race and ethnicity. . . ." (p. 5). Other respondents in the same research who identify with only a single race category subsequently mention an additional "race" category when answering the ancestry question.

## **RECOMMENDATIONS**

1. The American Anthropological Association supports the OMB Directive 15 proposal to allow respondents to identify "more than one" category of "race/ethnicity" as a means of reporting diverse ancestry. The Association agrees with the Interagency Committee's finding that a multiple reporting method is preferable to adoption of a "multiracial" category. This allows for the reflection of heterogeneity and growing interrelatedness of the American population.

2. The American Anthropological Association recommends that OMB Directive 15 combine the "race" and "ethnicity" categories into one question to appear as "race/ethnicity" until the planning for the 2010 Census begins. The Association suggests additional research on how a question about race/ethnicity would best be posed.

As recommended by the Interagency Committee, the proposed revision to OMB Directive 15 would separate "race" and "ethnicity." However, the inability of OMB or the Interagency Committee to define these terms as distinct categories and the research findings that many respondents conceptualize "race" and "ethnicity" as one in the same underscores the need to consolidate these terms into one category, using a term that is more meaningful to the American people.

3. The American Anthropological Association recommends that further research be conducted to determine the term that best delimits human variability, reflected in the standard "race/ethnicity," as conceptualized by the American people. Research indicates that the term "ethnic group" is better understood by individuals as a concept related to ancestry or origin sought by OMB Directive 15 than either "race" or "ethnicity." While people seldom know their complete ancestry with any certainty, they more often know what ethnic group or groups with which to identify. It is part of their socialization and daily identity. Additionally, there are fewer negative connotations associated with the term "ethnic group."

4. The proposed revision to OMB Directive 15 advocates using the following categories to designate "race" or "ethnicity": "American Indian or Alaskan Native," "Asian or Pacific Islander," "Black or African-American," "White," "Hispanic origin," "Not of Hispanic origin." Part of the rationale for maintaining these terms is to preserve the continuity of federal data collection.

However, the "race" and "ethnicity" categories have changed significantly over time to reflect changes in the American population. Since 1900, 26 different racial terms have

been used to identify populations in the US Census. Preserving outdated terms for the sake of questionable continuity is a disservice to the nation and the American people.

The American Anthropological Association recommends further research, building on the ongoing research activities of the US Bureau of the Census, on the terms identified as the population delimiters, or categories, associated with "race/ethnicity" in OMB Directive 15 in order to determine terms that better reflect the changing nature and perceptions of the American people. For example, the term "Latino" is preferred by some populations who view "Hispanic" as European in origin and offensive because it does not acknowledge the unique history of populations in the Americas. OMB may want to consider using the term "Hispanic or Latino" to allay these concerns.

5. The American Anthropological Association recommends the elimination of the term "race" from OMB Directive 15 during the planning for the 2010 Census. During the past 50 years, "race" has been scientifically proven to not be a real, natural phenomenon. More specific, social categories such as "ethnicity" or "ethnic group" are more salient for scientific purposes and have fewer of the negative, racist connotations for which the concept of race was developed.

Yet the concept of race has become thoroughly--and perniciously--woven into the cultural and political fabric of the United States. It has become an essential element of both individual identity and government policy. Because so much harm has been based on "racial" distinctions over the years, correctives for such harm must also acknowledge the impact of "racial" consciousness among the U.S. populace, regardless of the fact that "race" has no scientific justification in human biology. Eventually, however, these classifications must be transcended and replaced by more non-racist and accurate ways of representing the diversity of the U.S. population.

This is the dilemma and opportunity of the moment. It is important to recognize the categories to which individuals have been assigned historically in order to be vigilant about the elimination of discrimination. Yet ultimately, the effective elimination of discrimination will require an end to such categorization, and a transition toward social and cultural categories that will prove more scientifically useful and personally resonant for the public than are categories of "race." Redress of the past and transition for the future can be simultaneously effected.

The American Anthropological Association recognizes that elimination of the term "race" in government parlance will take time to accomplish. However, the combination of the terms "race/ethnicity" in OMB Directive 15 and the Census 2000 will assist in this effort, serving as a "bridge" to the elimination of the term "race" by the Census 2010.

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