



ASIAN AMERICANS
**ADVANCING
JUSTICE**
AAJC

August 25, 2025

Kyra Linse
Survey Director, Current Population Surveys
U.S Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Submitted via email to dsd.cps@census.gov

RE: Current Population Survey (CPS) Basic Demographic Items in FRN 2025-11855 (90 FR 27524) Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request

Dear Ms. Linse:

Asian Americans Advancing Justice – AAJC (Advancing Justice – AAJC) appreciates the opportunity to comment in response to the notice published in the Federal Register on June 27, 2025, regarding the proposed extension of the Current Population Survey (CPS) Basic Demographic Items.

As the Federal Register notes, the survey “has been the source of official government statistics on employment and unemployment since 1942.” In addition, supplemental surveys, such as the Annual Social and Economic Supplement, School Enrollment, Voting and Registration, and Food Security, among others, are vital sources of information on the state of our communities. We are especially interested in how the Asian American community is represented in this data. The CPS is crucial to our community, ensuring that all Asian Americans have access to equal opportunities. Data must be collected in a comprehensive and timely manner, as well as in a way that disaggregates data for different detailed Asian American subgroups. We appreciate the opportunity to comment on the proposed changes to how basic demographic items are collected in the CPS, particularly regarding the implementation of 2024 SPD 15.

Organizational Background

Advancing Justice – AAJC is a national non-profit, non-partisan organization founded in 1991. For over thirty years, we have served as a leading Asian American voice on civil rights issues in our nation’s capital. Our mission is to advance civil and human rights for Asian Americans and to build and promote a fair and equitable society for all.



Advancing Justice – AAJC considers data collection and reporting critical to achieving its mission. We have been working to eliminate the barriers that have historically resulted in the undercounting and underreporting of Asian Americans in federal data collection and analysis efforts. We have conducted comprehensive national, state, and local outreach and educational projects focused on the Asian American communities for Census 2000, Census 2010, and Census 2020. Ensuring our communities “see” themselves in how race and ethnic data are collected is an important aspect of our advocacy and engagement on data collection and reporting. We appreciate the importance of fact-based analyses for identifying disparate access and outcomes and devising effective solutions. In addition to extensive work engaging on census policy and community outreach and education to encourage participation in the surveys conducted by the Census Bureau, Advancing Justice – AAJC has been a key stakeholder in discussions over SPD-15. Moreover, we work to promote educational equity for the nation’s diverse Asian American communities and to protect the civil and human rights of all students and families. Finally, more than three hundred local organizations are involved in Advancing Justice – AAJC’s Community Partners Network, serving communities in thirty-seven states and the District of Columbia.

Comments on CPS Basic Demographic Items

Our comments focus on three of the four requested areas:

(A) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility

The Bureau of Labor Statistics (BLS) has been gradually expanding the reporting of Asian American and detailed Asian group data over the years. Since 2000, the BLS has reported annual employment and unemployment statistics for Asian Americans. In 2011, the BLS published their first paper on disaggregated detailed Asian group employment statistics.¹ The BLS announced in September 2023 that it will publish monthly and quarterly labor force data for detailed Asian groups.²

The data released by the BLS demonstrated the importance and utility of the information collection on Asian American and detailed Asian group employment data. The first paper from BLS with disaggregated detailed Asian group data in November 2011 showed a wide range of labor force participation and unemployment rates among the various Asian groups.³ For example, Japanese Americans had the lowest average unemployment rate from the combined years of 2008 – 2010 of 4.0 percent, compared with Other Asian Americans who had the highest at 8.5 percent. Over the same period, Japanese Americans also had the lowest labor force participation rate at 56.5 percent while Filipino Americans had the highest at 70.3 percent. Reporting only the aggregated Asian American labor force



participation (65.9 percent) and unemployment rate (6.2 percent) would hide the wide range of results and work force experiences within the Asian American community.

Similarly, the September 2023 blog post, [BLS Now Publishing Monthly and Quarterly Labor Force Data for Detailed Asian Groups](#), reported on how unemployment impacted different Asian groups during the COVID-19 shut down. Indian Americans had the lowest peak unemployment rate of 9.7 percent while Vietnamese Americans had the highest peak at 27.6 percent. Having monthly labor force statistics for detailed Asian groups allows resources to be more efficiently directed towards communities in the greatest need.

Disaggregated data on the labor force enables those making policy and program decisions to serve the community more efficiently. Knowing that the Vietnamese American community was hardest hit by COVID-19 shutdowns would enable decision makers to prioritize outreach to Vietnamese American community organizations and translations of key forms and support materials into Vietnamese. Knowing that Korean Americans were more likely to be small business owners would result in decision makers reaching out to Korean American small business associations and prioritizing outreach from small business support programs during COVID-19.

(C) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected

Implementing 2024 SPD 15

OMB's release of its new, updated SPD 15 standards (2024 SPD 15) in March 2024 required the collection of further detail beyond the minimum categories, the use of one combined question to ask about race and ethnicity, and the inclusion of a Middle Eastern or North African category. This marked an important step forward, particularly in allowing for more disaggregated data on Asian American communities, who are among the fastest growing and most diverse racial groups in the United States. Often viewed as homogenous, these communities include around forty detailed subgroups that can differ dramatically across key social and economic indicators, as noted in the previous section. Data disaggregation is critical because it allows us to see these differences. When data are not disaggregated, broad trends can mask much more negative or nuanced outcomes for specific subgroups of people, leaving their needs and issues invisible and unmet.

Census data, including data from the CPS, are the building blocks for our society. They are the basis for reapportioning political representation and redistricting at all levels, informing effective and efficient policy and planning decisions, and distributing more than \$2.8 trillion in federal funds to the states during fiscal year 2021.⁴ Without an accurate count of Asian Americans, policy and planning decisions will not address the needs of



growing Asian American communities. As one of the few surveys that currently disaggregates data for Asian Americans, the CPS provides the timeliest set of labor statistics data on Asian Americans within a month of the data being collected. By contrast, the American Community Survey only starts to release data nine months after the completion of the survey year. The 2024 SPD 15 standards provide greater opportunities to understand detailed subgroups for all race and ethnicity minimum categories. Moreover, the implementation of these revised standards to the CPS is an important moment to advance and modernize how our country collects and reports data on our communities. As a standard bearer for all federal agencies and other data collection entities, the Census Bureau must take the appropriate steps necessary to ensure that the implementation of 2024 SPD 15 addresses the needs of all communities.

The CPS Basic Demographic Items should be designed to collect as much self-identifying racial information as possible and in consideration of privacy needs and concerns. We have seen the population of Asian Americans grow faster outside the six largest groups (Asian Indian, Chinese, Filipino, Japanese, Korean, and Vietnamese) since 2000. The share of the remaining Asian categories in the 2000 to 2020 Censuses has increase from 12% in 2000 to 20% in 2020. The largest group in the other Asian category is Pakistani Americans, which has grown from 409,163 in the 2010 Census to 687,942 in the 2020 Census. If this trend continues, the Pakistani American population should approach one million members by the end of this decade. If detailed Asian group data are not collected, the Census Bureau would not be able to track when a detailed Asian group category becomes large enough to be reported by the CPS. Collecting detailed Asian group data also allows researchers with access to public use microdata to combine several years of CPS data to make estimates for smaller population groups, like the methodology used in Allard (2011).⁵

We recommend that the findings from the testing of the 2024 SPD 15 implementation in the CPS be used to inform the proposed changes to the American Community Survey and the upcoming 2030 Census race and ethnicity questions. The valuable insights into how the changes in the race and ethnicity questions shape how people self-identify and how it compares to previous question frameworks will help create a path forward. This will further a critical component of proper implementation of SPD 15 - addressing the additional research needed to better inform the implementation of the standards. This includes ensuring the detailed groups used will in fact elicit the best responses across all racial and ethnic groups, such as through proper signaling to the diverse set of detailed subgroups in each category.

OMB itself delineated further topics for research before the next review of the standards.⁶ In their own words:



1. What data processing procedures, such as coding, editing, and imputation practices, maximize the comparability of data collected across the Federal Government when using different combined question formats, for example between collections with and without write-in fields.
2. How to encourage respondents to select multiple race and/or ethnicity categories when appropriate by enhancing question design and inclusive language, for example by researching methods for ensuring complete and accurate estimates of people who identify as Afro-Latino.
3. How to collect high quality and useful data related to descent from persons who were enslaved in the United States, including research on terminology, question design, data quality, and willingness to provide these data.
4. The optimal order of presentation for minimum categories, including research on rates of data entry error, burden, and respondent preference.
5. Collecting race and ethnicity consistently across different languages and translations of the question.
6. Evaluating the detailed checkboxes as demographics shift over time for their ability to generate useful, high-quality data.
7. How respondents interpret each of the 2024 SPD 15 categories and definitions, and the combined race and/or ethnicity question in general, along with potential modifications to minimum category names.
8. How to better align the AIAN category title with its definition while preserving data quality, for example by exploring the use of a more inclusive title such as “Indigenous peoples of the Americas.”

2024 SPD 15 noted that “the detailed checkboxes and definition examples for the MENA category were selected to represent the largest population groups in the United States as reported by the 2020 Census. Although several commenters expressed interest in explicitly including Armenian, Somali, or Sudanese, the 2015 NCT [National Content Test] found that most respondents who identify as Armenian, Somali, and Sudanese did not select MENA when it was offered... Additional research is needed on these groups to monitor their preferred identification.”⁷



Meaningful Public Engagement

It is imperative that the Census Bureau continues to implement the 2024 SPD 15 and engages the public effectively and meaningfully. This will ensure that the Bureau produces more accurate and useful race and ethnicity data. Incorporating information on different types of engagements with the public and the frequency of those engagements can help produce better data in the long run. These engagements are especially important given the nation's ever-changing demographics and the ways in which racial and ethnic categories are socially constructed and change over time.

The public would also greatly benefit from engagement on ensuring racial and ethnic communities understand the question and response options under 2024 SPD 15. The Census Bureau must engage with interested stakeholders throughout the process of implementing the updated standards, including the collection of race and ethnicity data using a combined question and the use of a new MENA category. Active public engagement will not only ensure the accuracy of federal data, involving impacted community members early in the process gives them ownership over the content and outcome—building trust in the democratic process and potentially incentivizing increased participation. It is imperative that community organizations and leaders are engaged and consulted on these issues moving forward because mistakes and inaccuracies occur in the absence of community input.

We offer the following as best practices for community engagement:

- Engage interested stakeholders early and often. Bringing community members into the conversation early in the planning process can circumvent mistakes and inaccuracies—which undermine trust in the federal government and broader efforts to collect data on impacted communities.
- Engage with a diverse set of stakeholders, including both community-specific partners as well as those representing a more pan-ethnic perspective.
- Be specific about what is being discussed, any requests being made of the community, and what specific information the agency is attempting to obtain. In instances of prior engagement, it is incumbent on the agency to highlight any major changes that have occurred or are being considered at the point of the most recent request, as well as lifting up any points of potential controversy for feedback. Providing specific requests and the requisite background information will only help groups provide the most useful feedback to the agency.



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(D) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

We do not believe the proposed changes to the race and ethnicity question would result in any additional burdens for respondents. The information collection does not ask for additional information and only varies in how the information is asked and collected.

Conclusion

We thank the Census Bureau for the opportunity to comment on the testing of Basic Demographic Items for the Current Population Survey for the implementation of 2024 SPD 15. As indicated in our comments, we commend the Census Bureau for moving forward with further testing and research before implementing 2024 SPD 15. At the same time, we believe that moving forward with implementation as swiftly as possible is important. In order to help achieve both goals, we believe that the Census Bureau must continue meaningful engagement with community groups on these issues of implementation; continued coordination with advocacy groups will ensure that data are accessible and usable for the broader public and will help move the implementation process along more efficiently. If you have any questions, please contact me at tminnis@advancingjustice-aajc.org or 202 815-4412.

Sincerely,

Terry Ao Minnis
Vice President of Census and Voting Programs
Asian Americans Advancing Justice - AAJC