



ASIAN AMERICANS
**ADVANCING
JUSTICE**
AAJC

VIA EMAIL

April 30, 2017

Office of the U.S. Chief Statistician
Office of Information and Regulatory Affairs
Office of Management and Budget
9th Floor
1800 G St. NW.
Washington, DC 20503
Email: Race-Ethnicity@omb.eop.gov

Re: Proposals From the Federal Interagency Working Group for Revision of the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity
(Document Citations: 82 FR 12242)

Asian Americans Advancing Justice – AAJC, along with the 50 undersigned organizations, academic institutions, and individuals, submit this comment in response to the Office of Management and Budget’s (OMB) federal register notice regarding the Proposals From the Federal Interagency Working Group for Revision of the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (“Standards”), 82 FR 12242 (March 1, 2017). Asian Americans and Native Hawaiian and Pacific Islanders (NHPIs) comprise vastly diverse racial groups. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their needs unmet. The Standards are critical to our ability to maintain or improve upon the quality of these detailed data, which are essential to informed public policy on our communities and the fair allocation of federal, state, and local funding. We write to provide comments on the four topics outlined in the notice, as well as to note our concern about the process for these revisions.

Organizational Information

Advancing Justice – AAJC is a national non-profit, non-partisan organization founded in 1991. Advancing Justice – AAJC’s mission is to advance the human and civil rights of Asian Americans, and build and promote a fair and equitable society for all. Our wide-ranging efforts include promoting civic engagement, forging strong and safe communities, and creating an inclusive society.

Advancing Justice – AAJC is part of Asian Americans Advancing Justice (Advancing Justice), a national affiliation of five nonprofit organizations in Los Angeles and San Francisco, CA, Chicago, IL, Atlanta, GA and Washington, D.C. who joined to promote a fair and equitable society for all by working for civil and human rights and empowering Asian Americans and Pacific Islanders and other underserved communities. Additionally, over 150 organizations are involved in Advancing Justice – AAJC’s community partners network, serving communities in 32 states and the District of Columbia.

Advancing Justice – AAJC considers the Census, including the American Community Survey (ACS), to be the backbone of its mission to advance the human and civil rights of Asian Americans and build and promote a fair and equitable society for all. Advancing Justice – AAJC has maintained a permanent census program monitoring census policy, educating policy makers, and conducting community outreach and education to encourage participation in the surveys conducted by the Census Bureau in conjunction with other Advancing Justice affiliates.

Questionnaire Format and Nonresponse

In thinking about how information is collected, the most important factors for Asian American and NHPI communities are maintaining or improving the detailed reporting for all groups achieved previously and ensuring the accuracy of the data collected. In particular, we support the format that provides the best detailed reporting on Asian American and NHPI groups. Maintaining or improving upon the quality of these data is essential to informed public policy for our communities.

We continue to recommend that for either format (separate vs. combined), there should be:

- A maximum number of checkboxes included, with the number used during the 2010 Census serving as a minimum
- A maximum number of examples, with the number used during the 2010 Census serving as a minimum
- NHPI response options should be clearly identified as separate from Asian American response options

This recommendation is supported by the results from the 2015 National Content Test (2015 NCT), which showed that the combined question with detailed checkboxes performed better than the combined question with write-ins for all modes of responses for the decennial census.¹ We believe that utilization of checkboxes and examples is critical regardless of the format of the question(s).

¹ U.S. CENSUS BUREAU, 2015 NATIONAL CONTENT TEST RACE AND ETHNICITY ANALYSIS REPORT, Table H31, 299 (2017) [hereinafter 2015 NCT REPORT], <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>.

We continue to recommend that these recommendations apply to all platforms through which these questions could be asked (i.e. online or paper). We are concerned with potential biases that may be introduced if checkboxes for detailed subgroups are only offered on an online version of the question(s). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people.² Although internet surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results.³ Extrapolating from past research, we can anticipate that those who are elderly, low-income, and less English-language proficient will be the least likely to access the internet-based survey. These are the very populations that will be more likely to access a paper version of the questions and thus must have equal access to detailed checkboxes as those responding online.

OMB must develop clear guidance on how data prior to the revised Standards should be compared to data collected following the revised Standards. The ability to compare race and ethnicity data over time is critical to our work, including civil rights enforcement. Protocols and guidance for re-aggregating data, or “bridging” sets of data collected through different formats, must accompany any revisions to the census race and ethnicity questions. In particular, OMB should revise its Standards to ensure (a) comparability of data over time (bridging); (b) consistent tabulations of data, by federal agencies and federally funded programs, collected through a combined question with respect to both race and ethnicity; and (c) clear protocols and guidance for data users to follow in comparing 2020 census race and ethnicity data with data collected earlier in time.

With respect to questions about cost and feasibility, it is important for OMB to take the long view on its standards. That is, with the rapid diversity and change our country is facing, it will be important for the Standards to reflect that change, and this factor should weigh more heavily than cost factors. The reality is that the cost of not updating the Standards to reflect our ever-increasing diversity will run higher with each successive year that continues to implement outdated standards. There are also real cost savings with some of these proposed changes, including maximizing detailed reporting, and minimizing “Some Other Response” reporting with high quality data on the AAPI population. Including national-origin group examples and detailed origin check-boxes means both high-quality data objectives are achieved. Additionally, when “Some Other Race” reporting is minimized, less hand-coding is needed, leading to cost savings for the agency. Finally, the Interagency Working Group acknowledges that without making any of the proposed changes, “[p]roblems that exist with use of the current standards would not be

² Gonzales, Amy L. "Health benefits and barriers to cell phone use in low-income urban US neighborhoods: Indications of technology maintenance." *Mobile Media & Communication* 2.3 (2014): 233-248; Collins, Sarah A., et al. "Digital divide and information needs for improving family support among the poor and underserved." *Health informatics journal* (2014): 1460458214536065; Choi, Namkee G., and Diana M. DiNitto. "The digital divide among low-income homebound older adults: Internet use patterns, eHealth literacy, and attitudes toward computer/Internet use." *Journal of medical Internet research* 15.5 (2013).

³ Fan, Weimiao, and Zheng Yan. "Factors affecting response rates of the web survey: A systematic review." *Computers in Human Behavior* 26.2 (2010): 132-139. Shih, Tse-Hua and Xitao Fan. "Comparing response rates in email and paper surveys: A meta-analysis." *Educational Research Review* 4.1 (2009): 26-40.

resolved... includ[ing] the diminished utility of race/ethnicity information where nonresponse occurs and when individuals are misclassified; substantial processing costs for addressing nonresponse or misclassification of race/ethnicity questions; suboptimal interpretation of evidence used to inform policy making; and possibly misallocation of funds and failed protection under the law from discrimination.”⁴

Classification of Middle Eastern or North African (MENA) Race/Ethnicity

We are supportive of efforts by advocates in the MENA community to have distinct reporting categories for the community. Current OMB guidelines that classify persons from the MENA region as white by race are not accurate or useful, and are increasingly confusing survey respondents as well as government and other agencies tasked with collecting information on and providing services to these populations. The 2015 NCT results show that when a distinct MENA category was present, there was a significant decrease in responses for all other response categories, including a significant decrease in “Some Other Race” responses.⁵ This is not surprising as we saw that record numbers of persons of Arab, Iranian, Chaldean, Turkish and other Middle Eastern and North African origins chose to use the “Some Other Race” box to write-in an ethnic origin.⁶ Testing has shown time and time again that many members of this community do not see themselves in a “White” racial classification. The MENA category is practical and necessary, and it will provide the community and the government the ability to measure the community’s access to resources, disparate treatment and/or community needs in law enforcement, hospitals, schools, employment, and so forth.

As OMB looks to find answers to the questions posed about the definition of MENA, how best to message inclusivity of the classification, and determining the classification as a race or ethnicity, it should consult the impacted community first and foremost for the appropriate approach to take. As to the question of cost and burden, not providing the category would have a long-lasting greater cost to society and quality of data. Without the MENA response category, federal agencies will continue to fail to identify the unique issues facing this population and thus continue to fail to address their needs. This all comes at a time when many immigrants from the MENA region are less likely to want to cooperate with the federal government. Portions of these populations remain hard to reach because their relationship with government agencies is often characterized by fear. Immigrants from this region often lack a positive experience with government agencies in their native countries and have adopted a tendency to

⁴ FED. INTERAGENCY WORKING GRP. FOR RESEARCH ON RACE & ETHNICITY, INTERIM REPORT TO THE OFFICE OF MANAGEMENT AND BUDGET: REVIEW OF STANDARDS FOR MAINTAINING, COLLECTING, AND PRESENTING FEDERAL DATA ON RACE AND ETHNICITY 12 (2017) [hereinafter IWG REPORT], https://www.whitehouse.gov/sites/whitehouse.gov/files/briefing-room/presidential-actions/related-omb-material/r_e_iwg_interim_report_022417.pdf.

⁵ 2015 NCT Report at 59.

⁶ Comments, Asian Americans Advancing Justice – AAJC, Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, 81 FR 67398 (Oct. 31, 2016), <http://advancingjustice-aaajc.org/sites/default/files/2016-11/Advancing%20Justice%20AAJC%20-%20OMB%20Standards%20re%20Race%20and%20Ethnicity%20Oct%202016.pdf>.

distrust and avoid government interaction whenever possible. These are all reasons to take immediate steps to improve our tools to identify needs and serve these communities.

Again, OMB must develop clear guidance on how data prior to the revised Standards should be compared to data collected following the revised Standards. OMB should revise its Standards to ensure (a) comparability of data over time (bridging); (b) consistent tabulations of data, by federal agencies and federally funded programs, collected through a combined question with respect to both race and ethnicity; and (c) clear protocols and guidance for data users to follow in comparing 2020 census race and ethnicity data with data collected earlier in time. This will be especially important with the addition of a category for people of Middle Eastern and North African origin. While there will be an upfront cost associated with this bridging, the resulting data will be of higher quality, more reflective of how people self-identify, and ultimately more helpful for agencies, as well as community-based organizations, to identify instances of discrimination, better address hate crimes, and prioritize health and social services programs. The benefits of including a MENA classification in the Standards outweigh the costs that may be associated with its addition.

Additional Minimum Reporting Categories

We are supportive of OMB's intention to have the Standards provide a minimum set of racial and ethnic categories for use when Federal agencies are collecting and presenting such information for statistical, administrative, or compliance purposes and have worked to encourage agencies to collect additional detailed categories over the years. We have also encountered many agencies who have mistakenly misinterpreted the Standards as stating these categories are the ONLY permissible reporting categories.

At the same time, we agree with comments submitted by Asian & Pacific Islander American Health Forum (APIAHF) that these categories should not be static. With both the extensive population growth, as well as shifts in which communities and which regions are growing fastest in Asian American and NHPI communities, these standards should be regularly updated so that when Asian American and NHPI subgroups change in relative size over time, new check boxes are added to reflect the new populations. To ensure consistent data over time, the six groups in the NCT format should always remain, but influxes of new groups due to global factors may mean additional check boxes may be necessary.

We also support APIAHF's recommendation that OMB issue guidelines encouraging any programs or surveys collecting state or other regional data to add additional check boxes and examples of groups that may have larger representation in those states or regions but are not represented in the Standards. For example, states like Hawaii and Oregon have large groups of people residing under the Compact of Free Association (COFA). While Marshallese are included in the Standards, other populations from COFA countries, such as Chuuk and Pohnpei, are not. Surveys and programs collecting information specifically from regions with high COFA populations should add those options under Native Hawaiian and Pacific Islander.

Specific guidelines for the collection of detailed Asian race and ethnicity data

We recommend that OMB issue specific guidelines for the collection of detailed Asian race and ethnicity data that adopts the 2015 NCT recommended format, which includes separate checkboxes for Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese, and an “other Asian” category that includes additional examples of Pakistani, Cambodian, and Hmong. This is critical for understanding which Asian American groups are being served by agencies and which are underserved.

As a part of these specific guidelines for the collection of detailed Asian race and ethnicity data, OMB should emphasize that these standards are the minimum categories and that federal agencies can and should continue to go beyond them in their data collection. There are times when making a larger number of race and ethnicity options available both provides important data and would not be burdensome. For example, including a greater number of race and ethnicity categories available as selections or checkboxes in online surveys or digital program intake forms results in lower levels of burden than on paper surveys. As such, agencies collecting data online should be expected to collect data beyond the minimum standards.

Specific guidelines for the collection of detailed Native Hawaiian and Pacific Islander race and ethnicity data

We recommend that OMB issue specific guidelines for the collection of detailed Native Hawaiian or Other Pacific Islanders race and ethnicity data that adopts the 2015 NCT recommended format, which include as separate checkboxes Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, and an “other Pacific Islander” category, with Palauan, Tahitian, and Chuukese, etc. listed as “for example” write-in groups. This is critical for understanding which NHPI groups are being served by agencies and which are underserved.

We further strongly recommend that OMB remove “Other” from the category “Native Hawaiian or Other Pacific Islander.” The term “Native Hawaiian and Other Pacific Islander” has fallen out of favor. Instead, major NHPI organizations and community leaders declared nearly a decade ago that the preferred term “Native Hawaiian and Pacific Islander” is “a cultural construct and reflects the preference of the NHPI community.”⁷

Additionally, as part of these specific guidelines for the collection of detailed Native Hawaiian and Pacific Islander race and ethnicity data, OMB should emphasize that these standards are the minimum categories and that federal agencies can and should continue to go beyond them in their data collection. There are times when making a larger number of race and ethnicity options available both provides important data and would not be burdensome. For example, including a greater number of race and ethnicity categories available as selections or checkboxes in online surveys or digital program intake forms, results in lower levels of burden

⁷ Asian & Pacific Islander American Health Forum, Guidance on the Classification of Native Hawaiian and Pacific Islanders (2008), http://www.apiahf.org/sites/default/files/NHPI_Healthbrief0131_2008.pdf.

than on paper surveys. As such, agencies collecting data online should be expected to collect data beyond the minimum standards.

Burden and Cost Considerations

In considering burden and cost in updating the standards, particularly with respect to requiring the collection of detailed race and ethnicity data, one must first look at the cost of NOT moving toward updating the standards to require detailed race and ethnicity data. It is important for OMB to address the rapid diversity and change our country is facing by updating the standards to reflect our ever-increasing diversity. Additionally, there are cost savings due to less hand-coding needed with these updated standards, including maximizing detailed reporting, and minimizing “Some Other Response” reporting. Not moving in this direction would mean that we would not have proper data to inform our civil rights enforcement, our planning, or any of the work conducted by the undersigned organizations to serve our vulnerable communities.

The collection of detailed data is particularly critical for Asian Americans and NHPIs, who are among our nation’s fastest growing and most diverse racial groups. Often viewed as homogenous, these communities include more than 50 detailed race groups that can differ dramatically across key social and economic indicators. For example, while only 6% of Filipino Americans nationwide live below the poverty line, approximately 26% of Hmong Americans are poor.⁸ Similarly, about 49% of Marshallese live below the poverty line, while only 5% of Fijians are poor.⁹ Roughly 73% of Taiwanese Americans hold a bachelor’s degree, yet only 12% of Laotian Americans do.¹⁰ Similarly, about 18% of NHPI adults have a bachelor’s degree, with about 3% of Marshallese compared to 18% of Native Hawaiians having bachelor’s degrees.¹¹ Another example is pay equity. While AANHPI women are paid an average of 86 cents for every dollar a white man is paid, disaggregated data demonstrates that, for example, Native Hawaiian women are paid only 66 cents for every dollar a white man is paid; Vietnamese, Laotian, and Samoan American women 61 cents; Burmese American women 53 cents; and Bhutanese American women only 38 cents.¹² Finally, a Department of Labor report issued just this month on The Economic Status of Asian Americans and Pacific Islanders shows the necessity of disaggregated data in understanding the AANHPI populations.¹³ Without accurate data by

⁸ *A Community of Contrasts: Asian Americans in the United States: 2011*, Asian Pacific American Legal Center & Asian American Justice Center 36 (2011), available at http://www.advancingjustice.org/pdf/Community_of_Contrast.pdf. [hereinafter “Asian American Report”]

⁹ *A Community of Contrasts: Native Hawaiians and Pacific Islanders in the United States, 2014*, Asian Americans Advancing Justice & Empowering Pacific Islander Communities 18 (2014), available at http://empoweredpi.org/wp-content/uploads/2014/06/A_Community_of_Contrasts_NHPI_US_2014-1.pdf. [hereinafter “NHPI Report”]

¹⁰ Asian American Report at 31.

¹¹ NHPI Report at 11.

¹² Miriam Yeung, American Association of University Women, Overcoming the “Model Minority” Myth: AAPI Women Are Not Paid Equally (Mar. 15, 2016), <http://www.aauw.org/2016/03/15/aapi-equal-pay-day/>.

¹³ U.S. DEPT. OF LABOR & THE ECONOMIC STATUS OF ASIAN AMERICANS AND PACIFIC ISLANDERS (2016), https://www.dol.gov/_sec/media/reports/AsianLaborForce/2016AsianLaborForce.pdf.

detailed race group, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Furthermore, data users need detailed NHPI race data because each NHPI community strives to improve the health, education, and welfare for its people; has different political relationships, language, cultural practices, and identities; and has a different path for achieving equity.

Detailed data is also critical to our ability to break down the stereotype of the “model minority,” which has been used to erase the history of exclusion and discrimination against Asian Americans and NHPs. This stereotype is also used to obscure our concerns—failing to recognize critical differences and priorities between Asian American and NHPI subgroups—and therefore to excuse the lack of government resources and philanthropic investments in our communities. Finally, the lack of disaggregated data and the “model minority” myth create a wedge between AANHPIs and other communities of color by pitting the so-called “model minority” against communities that are “not models.” To combat the “model minority” stereotype and to provide sufficient information for policymakers to address the priorities and concerns of the AANHPI community, the data collected and reported for AANHPIs must be disaggregated by ethnicity as much and as often as possible. Only then can we build the solid foundation necessary for public policy, ensure that the right programs are reaching the right communities, and dismantle the conscious and unconscious beliefs that there is a racial hierarchy in our nation.

To that end, we believe that federal agencies should be required to collect detailed race and ethnicity data even when such data could not be responsibly reported due to statistical reliability and confidentiality concerns. This will provide us the option to aggregate the data across time for the same group, (i.e., pool the responses across a period of time), which could address statistical reliability and confidentiality concerns.

We strongly believe that OMB must require collection of detailed race and ethnicity data by Federal agencies. Without this requirement, Federal agencies are not likely to adopt collection of detailed race and ethnicity data. They have long had the option to do so, but we have not seen significant movement toward detailed reporting when it is not mandatory. Thus, we believe that the requirement should be made of all Federal agencies, with a process OMB could administer that would allow for agencies to apply for an exemption where such collection and reporting of detailed data would create undue hardship, in which case they must collect and report data based on the minimum categories. This process must be an open and transparent process that would allow for the public to weigh in on such an application.

As APIAHF suggests, we also believe the federal government can prioritize which agencies adopt these standards. There are certain data sets for which it is significantly more important to have disaggregated data than others. Recognizing it took several years for some agencies to adopt the 1997 standards, we urge OMB to prioritize working with agencies with data sets that would provide the most value and provide them with greater levels of technical assistance to quickly implement the revised Standards. Other data collection efforts could move forward at a slower pace, and burden may be reduced by waiting until resources are available.

Finally, if OMB were to strongly encourage, but not require, collection of detailed race and ethnicity data by Federal agencies (which we do not support as the preferred method to address this issue), the government should withhold funding to agencies that do not include detailed race and ethnicity data on their top three most used data products/forms by 2025 to encourage and evaluate conformance with such guidance.

Relevance of Terminology

Removal of Terms

We support the recommendations to remove the terms “Negro” and “Far East” from the current standards. These are terms no longer in common use and are offensive to some in the communities. There is no benefit to retaining these words in the current standards.

Transparency of Coding

We support the recommendation for OMB to provide guidance to Federal agencies that race/ethnicity coding procedures be documented and made publicly available. This would provide greater transparency and promote further consistency in Federal data collections, and would provide for greater input from the public to help improve such coding.

Goal of Standards

We support the recommendation for further clarification that the classifications in the standards are not intended to be genetically based, nor based on skin color, but rather as a social construct that can help inform public policy decisions.

We further recommend that OMB should continue to utilize this language in its standards: “The term ‘nonwhite’ is not acceptable for use in the presentation of Federal Government data. It shall not be used in any publication or in the text of any report.”¹⁴

Presentation of Data & Principal Minority Race

We recognize that the history of this country, as well as the current climate, may see continued relevance of denoting “principal minority” races or ethnicities. To that end, there may still be relevance to considering African Americans or Latinos as “principal minorities.” However, as the diversity of the U.S. continues to increase, we believe that OMB needs to revise how data is presented on diverse communities as well as aligning terminology to recognize the breadth of racial and ethnic communities comprising the American public today and strive to reflect the importance of all communities.

¹⁴ U.S. OFFICE OF MANAGEMENT AND BUDGET, Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity (Oct. 30, 1997), https://obamawhitehouse.archives.gov/omb/fedreg_1997standards/.

To that end, we believe it is a necessary and critical step for OMB to end the use of an “All Other Races” category in the standards. While the practice may have made the presentation of data easier for agencies, whereby they simply needed to present the “White” data and the “principal minority race” data (which to this point has been data on the African American community) and then presented the rest as “All Other Races” data, the practice did not serve the public at large, particularly those that comprised “All Other Races.” For example, combined, Asian Americans and NHPs are the “majority” populations in the state of Hawaii. Communities of color are the majority populations in the state of California. Demographics have significantly changed over the past twenty years. Asian Americans are the fastest growing race group in the United States, with 43% growth between the 2000 and 2010 Censuses. The NHP population also grew rapidly between 2000 and 2010, at 35%, more than three times faster than the U.S. population as a whole. These communities are often lumped into “All Other Races,” thereby making these fast-growing communities invisible. The practice moving forward should be to have agencies report on the data for, at a minimum, all racial and ethnic categories, with the addition of data on detailed groups as available.

We further urge OMB to include requirements for departments and agencies to justify any exclusion of data for the minimum categories. Agencies should specifically state whether any data in the minimum categories is not reported because the data was not collected, because the data was not analyzed, or because the data was analyzed but found to be not statistically significant. For example, if a survey’s sample size made it impossible to report out data on all the minimum categories, the agency should explicitly state that in reports and presentations.

Concern about process

We have concerns about OMB’s proposed plan to finalize the revisions to its standards on race and ethnicity without providing for any further input from the public. While we appreciate OMB slowing down the process from the previous Federal Register notice and providing for a longer comment period for this notice, not having an opportunity to weigh in on the IWG final recommendations and OMB’s final revisions runs the risk that the public will not have confidence in the results, as the perception will be that OMB is not interested in meaningful feedback and has already predetermined the outcome. While we understand that there is a deadline that the Census Bureau faces under Title 13, U.S.C., for delivery of their 2020 Census questions to Congress, we believe that it is critical for the public to have one more opportunity to provide feedback. Our recommendation is that OMB should propose final recommendations and invite public feedback before officially finalizing its revision to the standards.

Conclusion

Thank you for this opportunity to comment on the Proposals From the Federal Interagency Working Group for Revision of the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity as OMB strives to update its standards while keeping up with changes in society and population realities. Because Advancing Justice – AAJC believes this

is an important topic that is being addressed, it strongly urges OMB to provide one more opportunity for collecting input and feedback from the public prior to finalizing its revisions to the Standards. If you have any questions, please feel free to contact me at tminnis@advancingjustice-aaajc.org or (202) 296-2300 x127.

Sincerely,



Terry Ao Minnis
Director of Census and Voting Programs
Asian Americans Advancing Justice – AAJC

Organizations/Institutions

Adhikaar
Arizona State University
Asian American Federation
Asian American Organizing Project
Asian American Studies Program, University of Maryland
Asian Americans Advancing Justice - ALC
Asian Americans Advancing Justice - Atlanta
Asian Americans Advancing Justice - Chicago
Asian Americans Advancing Justice - Los Angeles
Asian Law Alliance
Center for Asian American Studies, UMass Lowell
Chhaya CDC
Chinese-American Planning Council
Coalition for Asian American Children and Families
Greater Chinatown Community Association
Indian Horizon of Florida
National Asian American PAC FL
National Commission on AAPI Research in Education
New York Japanese American Day of Remembrance Committee
University of Massachusetts Lowell
World Indigenous Nations University - Hawaii Pacific, Community Resource

Individuals

*(*Please note that individual signers are signing on in their individual capacity, not on behalf of their institution)*

Amanda Assalone (*Southern Education Foundation*)
Angelo Ancheta (*Claremont Graduate University*)

Bill Ong Hing (*Professor, University of San Francisco School of Law*)
Eumi K. Lee (*Professor, UC Hastings College of the Law*)
Ivy Ho (*Associate Professor, UMass Lowell*)
Janelle Wong (*Professor, University of Maryland*)
Jayesh Rathod (*Professor, American University Washington College of Law*)
Jennifer Lee (*Professor, University of California, Irvine*)
Jerry Park (*Associate Professor, Baylor University*)
Karen Chow, Ph.D. (*Full-Time Faculty, De Anza College*)
Karen Leong (*Associate Professor, Arizona State University*)
Karthick Ramakrishnan (*AAPI Data*)
Linda Tam (*Director, Immigration Practice, East Bay Community Law Center/Berkeley Law*)
Lisa Ikemoto (*Professor, U.C. Davis School of Law*)
Mari Matsuda (*Professor, University of Hawaii William S. Richardson School of Law*)
Melany De La Cruz-Viesca (*Assistant Director, UCLA Asian American Studies Center*)
Momi Fernandez (*World Indigenous Nations University - Hawaii Pacific, Community Resource*)
Natalie M. Chin (*Assistant Professor, Brooklyn Law School*)
Niko Schultz (*University of Maryland*)
Paul Watanabe (*Professor, U. of Massachusetts Boston*)
Rose Cuison-Villazor (*Professor, UC Davis School of Law*)
Sarah Kuhn (*Professor, University of Massachusetts Lowell*)
Sono Shah (*Researcher, AAPI Data*)
SueJeanne Koh (*Duke Divinity School, ThD candidate*)
Suki Terada Ports (*Family Health Project (Retired)*)
Taeku Lee (*Professor, University of California, Berkeley*)
Wei Li, (*Professor, Arizona State University*)
Wen Raiti (*National Asian American PAC FL*)
Wendyfa Wang-Girardot (*WNDY WNG*)