

October 24, 2016

SENT VIA EMAIL

Katherine K. Wallman
Chief Statistician
Office of Management and Budget
1800 G. St., 9th Floor
Washington, D.C. 20503

Re: Review and Possible Limited Revision of OMB's Statistical Policy Directive on Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity

Dear Ms. Wallman:

On behalf of the Iranian American community and the organizations named below, we submit this letter in support of the inclusion of the Middle East and North Africa (MENA) region category for the purposes of recording federal data on ethnicity. This proposed category would be especially helpful in resolving persistent concerns in the Iranian-American community as to how to identify themselves in the Decennial Census and to most accurately assess the population size of Iranian Americans residing in the United States and to ensure full political representation for the community.

Currently, Iranian Americans are not counted in federal data. Instead they must choose to identify based on the Office of Management and Budget's five categories for data on race and two categories of data on ethnicity. The creation of a new MENA region category will allow Iranian Americans to identify themselves along ethnic terms by specifying which subgroup or nationality they belong to. This will have a significant and enduring impact on the treatment and services available to the Iranian American community.

As you are aware, information collected through the Decennial Census and numerous other statistical collections is used for a wealth of purposes, including, but not limited to, the drawing of congressional and state legislative district boundaries; the evaluation of claims of private-sector employment discrimination and the monitoring of discrimination in housing, mortgage lending, credit, etc.; and the collection and presentation of population characteristics data, labor force data, education data, and vital and health statistics. Ensuring complete and accurate numbers regarding the population size of American racial and ethnic communities is absolutely critical to these communities' political, social, and economic empowerment. The U.S. government should thus take the steps required to completely and faithfully enumerate the size of all of U.S. racial and ethnic communities, including that of Iranian Americans.

For these reasons, we support the inclusion of MENA region category for maintaining, collecting, and presenting federal data on ethnicity. The inclusion of such a category would facilitate a more complete and accurate count of a growing American ethnic populations that are mostly invisible in federal statistics and reports. Moreover, we maintain that persons from the

MENA region, much like those of Hispanic or Latino origin, identify with many racial backgrounds and that ethnicity and national origin is the appropriate approach to this new category.

We thank you for the opportunity to submit our opinion in regards to this important matter and encourage the changes as proposed and requested herein are implemented.

Respectfully submitted,

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