



Public statement on initial proposals from the Federal Interagency Technical Working Group on Race and Ethnicity Standards for revising the Office of Management and Budget's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15):

On behalf of the National Iranian American Council (NIAC), we are writing to welcome and applaud the proposed changes to the 2030 Census and federal government surveys that will incorporate Middle Eastern and North African (MENA) as a new minimum category and the inclusion of Iranian as a new detailed category in Statistical Policy Directive (SPD) 15.

We also strongly support the collection of detailed race and ethnic categories by default, as the data collected will offer far greater understanding of our community and others in contrast to the minimum MENA category.

NIAC is the largest grassroots Iranian-American civic organization in the country and has been raising the Iranian-American voice on matters of civic importance for over 20 years, including in its advocacy for better representation on the Census and in other government surveys.

After decades of being grouped in with the white category of the U.S. Census, numerous researchers have investigated and concluded that a MENA category is, in fact, necessary given the comparably different experiences that MENA people have as opposed to their white, European-descended counterparts.

As an Iranian-American non-profit organization, we have long-advocated not only for the creation of a MENA category, but for an Iranian subcategory as well. While acknowledging the necessity of a MENA category is a progressive step in the right direction, a plethora of diverse identities are encompassed within the MENA label, which is why we urge the Office of Management and Budget to support the adoption of an Iranian subcategory among detailed categories in the 2030 Census as well.

From the 2010 Census to the 2020 Census to the current discussions on the 2030 Census, NIAC has always been on the frontlines of these efforts. In preparation for the 2020 Census, NIAC joined the [“Write in Iranian”](#) campaign where we conducted outreach to the Iranian-American community encouraging individuals to take this step on the census so that Iranian-Americans

could be properly acknowledged and represented. For the 2010 Census, [NIAC partnered with the U.S. Census Bureau](#) to increase awareness within the Iranian-American community about the Census, how to participate, and how to understand the impact of proper representation.

However, public outreach can be difficult when there is not an appropriate category to choose from, as has been the case on these prior surveys. This has led to a chronic under-counting of the Iranian-American community, which has had a significant impact on the community's representation and in the federal government's understanding of it.

For the 2030 Census, the addition of a MENA category and Iranian subcategory would finally address the significant gaps in research and policymaking on subjects such as socioeconomic conditions, health outcomes, and civic engagement relevant to MENA communities. On socioeconomic conditions, the data collected from a MENA category and Iranian subcategory would allow MENA small business owners and entrepreneurs to grow significantly. Being that most MENA small businesses exist in specific enclaves, they still suffer from various cultural, linguistic, and political barriers.

On civic engagement, MENA communities have historically been limited in achieving proper political representation in local and federal government due to the lack of accurate government data. Obtaining that data through the 2030 Census would enable MENA political participation in general—from voting to organizing to holding elected office.

According to Sociology professor Dr. Neda Maghbouleh, MENA individuals have statistically rejected the white label and have preferred identifying with MENA as a more accurate reflection of their lived experiences. Dr. Maghbouleh conducted a study using factors such as appearance, ancestry, religion, cultural engagement, and self-identification habits as indicators of how both MENA and non-MENA people perceived MENA racial status. Her research found that “when MENA are not offered a MENA label, 80% choose to identify as White. However, when MENA is offered as a category, only 10% continue to exclusively choose White. The majority instead choose MENA...”¹

Such changes are clearly supported by legislators, in particular those with a large MENA constituency. In December 2022, Representatives Debbie Dingell (MI-12) and Rashida Tlaib (MI-13) submitted a letter to the Department of Health and Human Services to collect and report data on MENA individuals in an attempt to address health disparities. Representatives Dingell and Tlaib emphasized how the creation of a MENA category “would allow HHS to recognize and address the social determinants of the MENA community's health outcomes and serve as an

¹ Maghbouleh, Neda, et al. “Middle Eastern and North African Americans May Not Be Perceived ... - PNAS.” *PNAS*, 5 Jan. 2022, <https://www.pnas.org/doi/10.1073/pnas.2117940119>.

important step to addressing minority health concerns and health disparities across the United States”².

From NIAC’s decades-long advocacy on representation, to convincing academic research results and findings from legislators all provide overwhelming evidence of the individual and societal benefits of adopting a MENA category so that the federal government can better understand its diverse populations and account for their needs. We look forward to the representation and opportunities that these Census changes will bring about for all members and backgrounds comprising the MENA community whose contributions and experiences have been invisible for far too long.

Sincerely,

National Iranian American Council

² “ Dingell, Tlaib Urge HHS to Add ‘Middle Eastern or North African’ Self-Identification Category to Address Health Disparities.” *Debbiedingell.house.gov*, 16 Dec. 2022, <https://debbiedingell.house.gov/news/documentsingle.aspx?DocumentID=3800>.