

Federal Race and Ethnicity Report Regulations

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Change is Coming!

NCES has finally posted the final rules and regulations for collection and reporting of Race/Ethnicity data.

This session will quickly review the requirements, and also present an alternative reporting format that might be of more utility within institutions and for statewide reporting in New Mexico.

Relevant Links

- IPEDES notice of changes:

nces.ed.gov/IPEDES/news_room/ana_Changes_to_10_25_2007_169.asp

- AIR Alert:

www.airweb.org/page.asp?page=1393

- Federal Register:

edocket.access.gpo.gov/2007/pdf/E7-20613.pdf

Timeline for Race/Ethnic Reporting

- October 30, 1997 - The OMB published final Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity
- December 15, 2000 - The OMB issued Provisional Guidelines on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity
- January 1, 2003 - Original date for new federal data collection and reporting. Not enforced because reporting guidelines were not available
- August 7, 2006 - Federal Register notice of Department of Education's Proposed Guidance on Maintaining, Collecting and Reporting Data on Race and Ethnicity
- September 21, 2006 - Deadline for submitting to ED comments on proposed guidance
- October 19, 2007 - Federal Register notice of Department of Education's Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education
- **Fall 2010 - Required implementation of final guidance for 2010-2011 school year**

Collecting Race/Ethnic Data

- The revised standards require that agencies offer individuals the opportunity to select **one or more races** when reporting information on race in federal data collections.
- In addition, race and Hispanic origin are to be considered as two separate and distinct categories.
- Hispanic origin data are to be collected separately from race, because in the federal statistical system ethnic origin is considered to be a separate concept from race, requiring a two question format for collecting race and ethnicity data.

Collecting Race/Ethnic Data

- Under the two question format, respondents should select one ethnicity code:
 - Ethnicity
 - Hispanic or Latino
 - Not Hispanic or Latino
- **AND** one or more race codes:
 - Race
 - American Indian or Alaska Native
 - Asian
 - Black or African American
 - Native Hawaiian or Other Pacific Islander
 - White
- Respondents will not be offered the choice of selecting a “two or more races” category.

Current IPEDS Reporting Categories

- 1) Non-Resident Alien
- 2) Race and Ethnicity unknown
- 3) Black, non-Hispanic
- 4) American Indian/Alaskan Native
- 5) Asian/Pacific Islander
- 6) Hispanic
- 7) White, non-Hispanic

New IPEDS Reporting Categories

- 1) Nonresident Alien
- 2) Race and Ethnicity unknown
- 3) Hispanics of any race

For non-Hispanics only:

- 4) American Indian or Alaska Native
- 5) Asian
- 6) Black or African American
- 7) Native Hawaiian or Other Pacific Islander
- 8) White
- 9) Two or more races

Instructions to Institutions

- Reporting is optional for 2008-09 and 2009-10.
- Reporting is mandatory for 2010-11 for enrollment and human resources and mandatory for 2011-12 for completions, 12-month enrollment, and graduation rates.
- Institutions **must** use a two question format:
 - **Hispanic or Not**
 - **Choose one or more races from the approved list**
- Institutions are encouraged to re-survey students and staff using the two-question format.
- To prepare, institutions are encouraged to begin to have internal and system level discussions regarding how and when to collect R/E data under the new formats to allow for reporting to IPEDS under the required timeframe.

Instructions to Institutions

- Consideration should be given to
 - how the data will be stored;
 - whether any mapping or bridging strategy is appropriate;
 - how the data will be aggregated for reporting to IPEDS; and
 - how related decisions and changes in systems and processes will be documented.
- Institutions need to determine whether to, and if so, when they will re-survey students and employees,
 - including whether this will be a one-time re-survey or
 - make it part of all future registrations.
- They will need to determine procedures for maintaining and updating their files, as well as how to handle any missing data for students and employees who may not be at the institution at the time of the re-survey.

Implications – UNM Perspective

- All demographic forms must be changed (student admissions, both web and paper, and staff/faculty demographic forms);
- New data storage and data entry requirements
 - Banner has fields for the new requirements, but at UNM we haven't used them yet, we need to understand them and test them;
- All existing reports that report on ethnicity must be changed to use the new fields;
- Crosswalks from the legacy coding to the new race/ethnic coding must be developed;

Implications – UNM Perspective

- External reporting, such as to the HED, must be modified and coordinated statewide;
- Stand-alone systems, such as our applicant tracker application for staff, must also be modified to accommodate the new categories;
- Affirmative action plans and availabilities will need to be recomputed using the new categories;
- The list goes on, and on, and on, ...

Concerns

- Trend data will be difficult, and counts may change for some groups, such as Native Americans.
- Anyone who answers “Hispanic” will be reported that way regardless of how they answer the race question.
- Anyone who answers two or more races will be reported that way, regardless of what their choices are.
- Some groups, such as Native Americans, may show lower numbers using the new reporting standard.

Some data from 2000 Census

- Census Brief: *The Two or More Races Population: 2000*

<http://www.census.gov/prod/2001pubs/c2kbr01-6.pdf>

- For the entire country, 2.4% reported more than one race (only .1% report three races)
- More common in the West, more common among American Indians, and more common among Hispanics younger than 18
- For American Indians, 39.9% reported more than one race, this could have major implications in states like New Mexico in terms of population counts and representation in college

Alternative Reporting Option

- Back in March 1998 and February 1999 there were two Policy Panels on Racial/Ethnic Data Collection, co-sponsored by NCES and NSF
 - nces.ed.gov/ipeds/pdf/finalracerec.pdf
- The purpose of the panel was “To make final recommendations regarding the changes to the IPEDS survey forms, and the timing and process for implementing these changes”
- These recommendations were not adopted, but the recommended reporting format may be worth considering.

Panel Recommendations

- How should data be *reported* to NCES and what categories should be used
 - This question underwent the most discussion, and it is still probably the issue that is most problematical in implementation nationally
 - The panel recommended an approach that would display the data and provide both a minimum and a maximum count for each racial/ethnic category

Proposed Reporting Format

Minimum Lower Bound Counts

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(optional) (11a)
		U.S. Citizens and Permanent Residents											
		Reported only one race/ethnicity											
	Non-Resident Alien	Unknown Race/Ethnicity	American Indian/Alaskan Native	Asian	Black/African American	Native Hawaiian and Other Pacific Islander	White	Hispanic/Latino Only	Hispanic/Latino Plus One or More Races	Non-Hispanic/Plus One or More Races	TOTAL (1) -- (10)	Total more than one race (9) -- (10)	
M													
F													

Maximum Upper Bound

		(12)	(13)	(14)	(15)	(16)	(17)
		U.S. Citizens and Permanent Residents					
		Any selection of race/ethnicity alone or in combination					
		American Indian/Alaskan Native	Asian	Black/African American	Native Hawaiian and Other Pacific Islander	White	Hispanic/Latino (8) -- (9)
M							
F							

Minimum and Maximum Reporting

- The proposed format is complex, but it also reflects how the census bureau reported results from the 2000 Census
- They also report those who select only one racial category and all those who select a category in combination with another category
 - For example, in New Mexico the minimum reported percentage of American Indians is 9.5%, the maximum is 10.5%

Next Steps?

- Each institution must comply;
- It would be very helpful to have a consensus approach within New Mexico and to change our DEAR reporting at the same time we comply with the Federal requirements.
- Timing will be critical
 - For example, UNM will finalize its 2009-10 student application within the next few weeks
 - We'll have to do our re-survey of staff and faculty when faculty are available, i.e. if we re-survey in summer 2010 few faculty will be on campus.

Conclusions

- If we do adopt the min/max approach, or something different than what IPEDS uses, it will make it difficult to obtain good peer data, and it could also lead to institutions reporting different sets of numbers, and that can lead to confusion and difficulties of explanation.
- We need to carefully consider the options and immediately start our planning – 2010 isn't that far away!