



A driving force for health equity

Submitted via [regulations.gov](https://www.regulations.gov)

April 12, 2023

Honorable Shalanda D. Young
Director, Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Honorable Bob Sivinski
Chair, Interagency Technical Working Group on Race and Ethnicity Standards
1650 17th St. NW
Washington, DC 20500

Re: *Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards*

Dear Director Young and Chair Sivinski,

On behalf of OCHIN, I appreciate the opportunity to submit comments in response to the *Initial Proposals for Updating the Office of Management and Budget (OMB) Race and Ethnicity Statistical Standards*.

OCHIN is a national nonprofit health IT innovation and research network with over two decades of experience transforming health care delivery among underserved communities. OCHIN provides leading-edge technology, data analytics, research, health IT workforce training and development, technical assistance, and additional support services to more than 1,300 locally controlled community health care sites, reaching more than 6 million patients in 47 states and supporting more than 22,000 providers.

OCHIN is committed to driving the widespread development, testing, and adoption of national digital data and technical standards that advance equity and support interoperability and the suitability of health data for a full range of uses in health care, public health, and clinical research. National digital data standards are the foundation needed to improve the quality of care, bend the cost curve, and empower patients, while paving the way for payment and delivery transformations, particularly for community-based providers that do not have the resources to comply with varied local, regional, state, and national standards. Further, widely adopted national digital data and technical standards with uniform guidance are essential to address structural inequality in health care as well as to mount timely, data-driven responses to public health emergencies.

Recommendations

- **OCHIN lauds OMB's initial proposal to the extent it is intended to drive uniform, national digital data and technical standards and guidance for all federal agencies collecting and reporting race and ethnicity data.** A single standard and associated guidance would reduce complexities, errors, reporting burdens and variability that undermines interoperability and quality data collection. Reducing complexity and duplication not only decreases costs and resource needs but can facilitate solutions that enhance detection of health disparities, address clinician and patient cognitive fatigue, improve research and use of data in clinical informatics, and contributes to streamlined clinical practice and operations.

- Directionally, OCHIN supports the proposal to combine questions on race and ethnicity as long as it is clear that individuals are able to make multiple selections to account for both race and ethnicity and/or multiple races or ethnicities. Harmonizing race and ethnicity into a single standardized question is a first step in remedying the challenges created when individuals do not identify with racial or ethnic categories most frequently offered. OCHIN also supports the suggested inclusion of additional ethnic and racial options offered.

- Additional input, testing, and evidence are required to address several categories proposed that are ambiguous or need additional clarification.

OCHIN would welcome clarity on why North African is differentiated from African, for example, as this arguably creates an arbitrary differentiation. In addition, subcategories under Hispanic/Latino are not consistent. The proposal includes Mexican/Mexican American and then lists other Hispanic/Latino ethnicities without specifying whether they are “American” or not. This is not consistent as there are Dominican-, Salvadoran-, Cuban-, and Colombian-Americans. To be consistent it should simply list the ethnicity and omit American as this is a question about ethnicity and not citizenship status.

What is your race or ethnicity?
Select all that apply AND enter additional details in the spaces below. Note, you may report more than one group.

WHITE – Provide details below.

<input type="checkbox"/> German	<input type="checkbox"/> Irish	<input type="checkbox"/> English
<input type="checkbox"/> Italian	<input type="checkbox"/> Polish	<input type="checkbox"/> French

Enter, for example, Scottish, Norwegian, Dutch, etc.

HISPANIC OR LATINO – Provide details below.

<input type="checkbox"/> Mexican or Mexican American	<input type="checkbox"/> Puerto Rican	<input type="checkbox"/> Cuban
<input type="checkbox"/> Salvadoran	<input type="checkbox"/> Dominican	<input type="checkbox"/> Colombian

Enter, for example, Guatemalan, Spaniard, Ecuadorian, etc.

BLACK OR AFRICAN AMERICAN – Provide details below.

<input type="checkbox"/> African American	<input type="checkbox"/> Jamaican	<input type="checkbox"/> Haitian
<input type="checkbox"/> Nigerian	<input type="checkbox"/> Ethiopian	<input type="checkbox"/> Somali

Enter, for example, Ghanaian, South African, Barbadian, etc.

ASIAN – Provide details below.

<input type="checkbox"/> Chinese	<input type="checkbox"/> Filipino	<input type="checkbox"/> Asian Indian
<input type="checkbox"/> Vietnamese	<input type="checkbox"/> Korean	<input type="checkbox"/> Japanese

Enter, for example, Pakistani, Cambodian, Hmong, etc.

AMERICAN INDIAN OR ALASKA NATIVE – Enter, for example, Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat Tribal Government, Tlingit, etc.

MIDDLE EASTERN OR NORTH AFRICAN – Provide details below.

<input type="checkbox"/> Lebanese	<input type="checkbox"/> Iranian	<input type="checkbox"/> Egyptian
<input type="checkbox"/> Syrian	<input type="checkbox"/> Moroccan	<input type="checkbox"/> Israeli

Enter, for example, Algerian, Iraqi, Kurdish, etc.

NATIVE HAWAIIAN OR PACIFIC ISLANDER – Provide details below.

<input type="checkbox"/> Native Hawaiian	<input type="checkbox"/> Samoan	<input type="checkbox"/> Chamorro
<input type="checkbox"/> Tongan	<input type="checkbox"/> Fijian	<input type="checkbox"/> Marshallese

Enter, for example, Palauan, Tahitian, Chuukese, etc.

- We strongly urge the federal government to actively engage with states that continue to advance alternative options to demographic data collection to harmonize collection and reporting. The current piecemeal and patchwork arrangement of data collection and standardization between the federal government, states, and others, results in duplicative effort and work on the part of overworked providers and falls heaviest on providers in underserved communities. For example, OCHIN has been very involved in efforts to develop special interfaces to account for different data collection and reporting requirements in both Oregon and Connecticut. In evaluating the OMB proposal, it would not map easily to the requirements required by Oregon. And, only recently was OCHIN able to offer a solution to reduce the similar, but different race and ethnicity reporting required by Oregon and the U.S. Health Resources Services Administration requirements for federally qualified health centers.

This initial proposal is a commendable start to the process of creating a single, uniform standard in the U.S. Please contact me at stollj@ochin.org if we can provide any additional information to support your efforts to create national standardization.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Stoll". The signature is written in a cursive, flowing style.

Jennifer Stoll
Executive Vice President
External Affairs