V. POLICY RECOMMENDATIONS

Based on the challenges the CRDT and RDT teams faced in collecting race and ethnicity data on COVID-19 outcomes, houselessness, criminal arrests, and police violence, we make the following policy recommendations concerning racial and ethnic data collection and reporting in the United States:

1. Centralize and standardize racial and ethnic demographic data collection and reporting across critical issue areas.

Many of the challenges the CRDT and RDT faced in trying to collect the most accurate and complete race and ethnicity data possible could have been largely avoided if states and local entities reported their data to a national source that could present the data in a standardized way. Such a system would ensure consistency across local and state entities in terms of how data are collected and reported,[124] what data are collected and reported, and how often the data are updated, which would allow robust data analysis and comparisons across geography and time. Federal leadership is best suited to create such a system. In order to understand the full ecosystem of racial inequity and subordination, this system should include race and ethnicity data in key policy areas such as health, housing, employment, education, the criminal legal system, and the environment.

2. Use existing federal race and ethnicity standards as a starting point, and regularly reevaluate and amend such standards.

The CRDT and RDT teams found that, across different jurisdictions and issue areas, the OMB categories are ubiquitous and are often treated as default standards even when not required. To maximize efficiency and increase the likelihood of compliance, existing federal standards, including the OMB racial categories, should

be the starting point for a centralized system of race and ethnicity data collection. The federal government should review and amend these standards immediately, and continue to do so regularly with input from scholars, community members, and advocates. This process should include a reevaluation of the OMB racial and ethnic categories.

3. Create an oversight board to monitor how the government uses race and ethnicity data.

Race and ethnicity data, like all information, are not always used appropriately. To mitigate that risk, an external oversight board should monitor the creation and use of a centralized and standardized data collection system. This board would ensure that the government's data practices comply with existing laws and are responsible, ethical, and equitable. The board's duties should include making sure that data concerning racial inequities is presented with appropriate context about structural racism as a root cause,[125] so that such disparities are less likely to be used to discriminate or promote racist ideas and stereotypes. This board should include community partners and advocates who are most likely to be impacted by or familiar with counteracting racist abuses and biases associated with data.[126]

4. Incentivize consistent and timely state and local participation through adequate funding.

The CRDT and RDT teams' efforts were hampered by the voluntary and haphazard nature of local and state data reporting. The RDT team also found that race and ethnicity data quality was often subject to the arbitrary geographic boundaries and practices of service providers, indicating a need for stronger data infrastructure at the local and state government levels. The federal government should provide financial incentives to states and localities to collect and report racial demographic data in a consistent and timely manner to a centralized source. Conditional funding should be tied to critical state needs, such as infrastructure development, to adequately incentivize participation. Additional, separate funding should also be provided to all entities that participate to support data administration infrastructure. As part of this system, states and local entities should report data that they are already collecting *and* be incentivized with more funds to increase their data collection efforts to fill existing data gaps. Additional incentives to collect and report racial and ethnic data should be provided by way of research grants to entities that are committed to studying and counteracting racial and ethnic inequities that these data collection efforts reveal.

5. Monitor noncompliance.

Public visibility and accountability can complement financial incentives to motivate participation in a centralized and standardized race and ethnicity data

collection system. The aforementioned oversight board should monitor the participation of entities that collect (or should be collecting) data. Data reporting dashboards, websites, reports, and similar platforms associated with this centralized data collection system should explicitly note which entities have chosen not to participate.

6. Make data available at the national level, and also disaggregate at the state and local levels.

Race and ethnicity data should be aggregated at the national level, but not at the expense of information about local and state-specific trends, because it is also necessary to understand local and state differences in how policies are implemented and the impacts they have. Data should be collected and reported in a manner that provides researchers and policymakers with the option of seeing aggregated data at the national level and disaggregated data at the local and state level.

7. Encourage and facilitate more granular race and ethnicity reporting.

The CRDT and RDT teams' efforts to analyze racial and ethnic inequities were limited by the amount of granularity reflected in the available data. Entities should be encouraged to collect data at more granular levels than the OMB racial and ethnic categories to reflect the ethnic and racial makeup of their particular jurisdictions, and to reveal inequities between subpopulations.[127] Specifically, states should collect data about additional categories that are not included in the OMB (as relevant to their populations), but which can be collapsed into the OMB categories (if necessary at the national level).[128] This approach "can provide the level of detail needed to improve quality at the local level while providing standardized data to assess national progress."[129] More granular reporting also ensures that, if larger racial categories are changed over time, the original data are reported with sufficient detail such that they can be reconfigured to fit within a new reporting scheme, preserving longitudinal data.

8. Report race and ethnicity data as intersecting measures.

Although "dominant conceptions of discrimination condition us to think about subordination as disadvantage occurring along a single categorical axis,"[130] demographic characteristics, such as race and gender, are not "mutually exclusive categories of experience and analysis."[131] An antiracist approach to data collection must account for the complexity and nuance of race, ethnicity, and (as discussed in the following recommendation below) additional characteristics and experiences. The CRDT and RDT teams' data collection efforts were often hampered by reporting styles that failed to account for the fact that people can be part of multiple racial or ethnic groups. Race and ethnicity data should be collected and reported

as intersecting characteristics in order to provide the most clarity and flexibility regarding the breakdown of ethnicity and race. For example, it is not enough to know how many people who experience houselessness separately fall into the Black and Hispanic/Latino/a/e/x categories. Reporting entities should specify how many of those who fall into the Black category *also* fall into the Hispanic/Latino/a/e/x category, and how many do not. Reporting entities must provide more detail about the breakdowns across all the race and ethnicity categories, including those people who are part of multiple racial or ethnic groups. This system should not limit the number of ethnicities or races that may apply to each person.

9. Collect and report data across additional characteristics and variables.

Race and ethnicity data should be disaggregated by additional characteristics and variables in order to better understand and address the experiences of people who are subjected to multiple simultaneous forms of oppression based on their racialized, gendered, and otherwise minoritized identities. This additional information, including but not limited to sex, gender identity, sexual orientation, age, disability, religion, income, linguistic usage, educational attainment, socioeconomic status, "street race,"[132] and national origin, will enable more robust intersectional research.

10. Tailor privacy-related data suppression practices to the realities of each dataset.

Data suppression is sometimes a useful method to protect individual privacy, such as when a number is so small that it risks disclosing the identity of those it pertains to. However, suppression should only be implemented when there is a real privacy concern. Small numbers may need to be suppressed in local or state databases, but may not need to be suppressed when they are aggregated at the national level. Accordingly, state and local entities that collect race and ethnicity data should remove any identifying information, such as names and birth dates, before reporting the data to a national database. Those entities should then report all disaggregated data to a national database through an encrypted platform, and the national database should decide whether suppression of small numbers is necessary at the national level. State and local entities should, of course, continue to suppress problematically small numbers for their own, publicly-facing reporting. Reporting entities should not be permitted to omit or merge racial and ethnic categories in reports to the national platform as an alternative way to address privacy concerns, and should be discouraged from omitting or merging categories in their own data reports.

11. Make data publicly available and accessible.

Public information requests and similar processes are energy-intensive, slow, and cumbersome. These procedures are simply not feasible when researchers and policy makers need to obtain data quickly to respond to public inequities, as was the case for the CRDT team. For this reason, apart from data that must be suppressed or protected due to privacy or serious confidentiality concerns, racial and ethnic data should be made freely, publicly, and easily accessible for use by advocates, scholars, policymakers, and others. All such data should contain explicit disclaimers and guidance on best practices concerning any gaps and limitations associated with them.