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American Federation of Teachers

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Asian Americans Advancing Justice |
AAJC

President and CEO

Maya Wiley



The Leadership Conference
on Civil and Human Rights

March 30, 2023

The Honorable Shalanda D. Young
Director, Office of Management and Budget
Executive Office of the President
725 Seventeenth Street NW
Washington, DC 20503

The Honorable Richard Revesz
Administrator, Office of Information and Regulatory Affairs
Executive Office of the President
725 Seventeenth Street NW
Washington, DC 20503

Re: 88 FR 5375

Dear Director Young and Administrator Revesz:

On behalf of The Leadership Conference on Civil and Human Rights, Arab American Institute, Asian Americans Advancing Justice | AAJC, Lawyers' Committee for Civil Rights Under Law, MALDEF, NAACP Legal Defense and Educational Fund, and the National Congress of American Indians, we write to request an extension of the deadline for comments on the initial proposals from the Federal Interagency Technical Working Group on Race and Ethnicity Standards for revising OMB's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting and Presenting Federal Data on Race and Ethnicity (SPD 15) issued on January 27, 2023 (R&E FRN). Noting that the deadline for comments to the R&E FRN is currently April 12, 2023, we request that the time for comment on the proposed revisions be extended by an additional 90 days to July 11, 2023.

On March 21, 2023, The Leadership Conference and its sister organization, The Leadership Conference Education Fund, held an all-day convening to discuss the initial proposed revisions to SPD 15. In attendance were civil rights, community, academic, philanthropic, and other groups as well as representatives from OMB and the U.S. Census Bureau. While many stakeholders have been engaged in advocacy around the revisions for years, the convening confirmed that many stakeholders still have significant questions regarding the proposal and would benefit from additional engagement with OMB on their issues of concern. The changes proposed will have implications for — and indeed will have a significant impact on — the nation's data landscape for years if not decades to come, and groups must be afforded the opportunity for due research and consideration prior to providing their comments.

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The requested additional time is needed so that various stakeholders are able to continue to process the implications of such revisions on various sub-groups. We understand that NALEO Educational Fund and National Urban League have made a similar request.

Thank you for your consideration of our views. For any questions regarding this request, please contact Meeta Anand, senior director of the census and data equity program at The Leadership Conference, at anand@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
Arab American Institute
Asian Americans Advancing Justice | AAJC
Lawyers' Committee for Civil Rights Under Law
MALDEF
NAACP Legal Defense and Educational Fund
National Congress of American Indians