

April 25, 2017

**SENT VIA EMAIL**

The Office of the U.S. Chief Statistician  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
9<sup>th</sup> Floor, 1800 G Street, N.W.  
Washington, D.C. 20503

Dear Dr. Nancy Potok:

On behalf of the Iranian American community and the organizations named below, we submit this letter in response to the Federal Register notice **Vol. 82, No. 39** published on Wednesday March 1, 2017 regarding the “Classification of Middle Eastern or North African Race/Ethnicity.”

- I. *MENA is an Ethnicity*: If MENA is collected as a separate reporting category, **MENA must be considered an ethnicity**. We maintain that persons with origins in the MENA region (**much like those of Hispanic origin**) identify with many racial backgrounds and that ethnicity is the appropriate approach to this new category.
- II. *Conditional Minimum Reporting Category*: As an ethnic classification, the MENA category must be treated equally and not be subsumed under any other major OMB tabulation category. The MENA ethnicity category **must become a required minimum reporting category** if the sample size is sufficient to meet the threshold requirement for no disclosure risk and reporting given that guidance is provided to all collection agencies.
- III. *Special Groups*: All groups with origins from the Middle East and North Africa who self-identify with this region should be included in the MENA ethnic category.
- IV. *MENA Definition*: Like any other major OMB tabulation category, the MENA ethnic category must represent persons with origins in the Middle East and North African regardless of their nativity status or parental place of birth. We also request that the IWG and OMB adopt a comprehensive geographic definition of the MENA category that includes the population with origins in the **League of Arab States (22 member states)**, **Non-Arab MENA States** (Turkey, Iran and Israel) and **Trans-national communities** (Assyrians/Chaldeans, Kurds, Berber).
- V. *Cost, Burden and Security*: Requiring an additional reporting category for MENA across Federal information collections recognizes this growing American ethnic population that has been mostly invisible in federal statistics and reports, and yet remains hyper-visible in our country’s political, policy, law enforcement and security arenas. We believe accurate and inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues. A separate reporting category should be required when reporting meets the requirement for no disclosure risk and does not **risks the confidentiality or privacy of the MENA population**. **We request assurances that all laws protecting confidentiality be strictly enforced with significant penalties on breaching confidentiality**. When special tabulations are requested beyond what is publically available, mechanisms that ensure transparency must be maintained.

Finally, we strongly support a combined question format which treats the MENA ethnicity as equal to all OMB categories and recommend that the OMB treat the MENA category as one region that is very complex and diverse with sub-boxes assigned to the largest groups by population in the U.S. (Lebanese, Iranian, Egyptian, Syrian, Iraqi, and Israeli).

We thank you for the opportunity to submit our opinion in regards to this important matter and encourage the changes as proposed and requested herein are implemented.

Respectfully submitted,

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