

## **Race/Ethnicity Identification**

### **Options for Implementing Federal Guidelines for Race/Ethnicity Data Collection and Reporting**

#### **Background:**

In September 2007, UW System implemented a change to its student application forms to allow applicants to select more than one race/ethnicity. The form asked a single race/ethnicity question with a combined list of Hispanic/Latino ethnic groups and other races. (Refer to the current UW one-question model at the end of this document.) In fall 2007, UW campuses began to record this data for students applying for enrollment in 2008 and UW System began to collect and report multiple race/ethnicities for these applicants.

In October 2007, the U.S. Department of Education posted to the Federal Register the "Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education." (See the Federal Register, Volume 72, Number 202, pp. 59266-59279: <http://edocket.access.gpo.gov/2007/pdf/E7-20613.pdf>). The guidance issued by the Department covered two separate issues: (1) the format to be used for the collection of Race/Ethnicity (R/E) data by institutions and (2) the format for reporting of aggregate data to the Department. The most significant change in this guidance for UW System was the requirement that a two-question (with Hispanic/Latino origin collected as a separate item), rather than one-question, format be used to collect R/E information.

The new Federal requirements permit collecting and reporting using the new format in 2008-09 and 2009-10. The Federal guidelines require collection and reporting in the new format beginning in 2010-11.

#### **Review of Current UWS Practices:**

In response to this guidance being issued, a small group of UWS and campus staff reviewed the relevant information, and consulted with UWS legal counsel, to determine if our current practices were compliant, or if changes might be required. (The names of the individuals who participated in this review are listed at the end of this document.) The results of this informal review were a good news/bad news scenario. On the positive side, it appears that the reporting of aggregate data will not pose any problems for us. With the changes implemented in fall 2007, we began to collect R/E data in a manner that allows us to comply with the new reporting guidelines. Unfortunately, it appears that we will need to change the question format we adopted in fall 2007 on student application forms, in order to be compliant with the Federal data collection requirements.

As noted above, institutions are now being required to use a two-question format (allowing for students to choose multiple races) in collecting R/E data. The two-question format is as follows:

- The first question is whether the respondent is Hispanic/Latino.
- The second question is whether the respondent is from one or more races from the following list: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White.

Institutions are permitted to collect additional information about R/E categories such as those we implemented in fall 2007 (e.g. Cuban, Puerto Rican, Hmong, Laotian, etc.) and are encouraged (but not required) to re-survey students and staff using this new format. Institutions will continue to report “non-resident aliens” in a separate category and are allowed to report students in an “Unknown” category. (See sample of potential UW two-question format at the end of this document.)

According to UWS legal counsel, in order to be compliant, it appears that we have no choice about changing from the one-question to the two-question format. However, we do have options as to when and how we implement this change. These will be discussed in the section below.

One other issue which may need to be addressed is the fact that we currently allow students to choose an “Other Race” category and enter “Other Race” text on the application. Legal counsel have advised us that this practice may not be compliant with the Federal guidelines, in terms of both data collection and reporting of R/E data. We have also heard from some campuses that this information is not particularly useful, and may be causing more data problems than it’s worth. If that is the case, perhaps campuses would welcome doing away with this category. We would appreciate your input on this issue.

### **Implementation Options:**

The following section describes two options for implementing this change as well as advantages associated with each option.

- A. Option 1 - Change to the two-question format on the electronic application (EApp) and paper applications released September 1, 2008 for fall 2009 applicants.

#### Advantages:

1. Allows 5 months for planning and ensuring that all the pieces are ready for September 2008 implementation, and also allows implementation when issues are still current. Gets this change out of the way as soon as possible.
2. Data could be submitted in the new Federal reporting format in the optional year, 2009-10. This would provide a year to work out the kinks before it’s required in 2010-11.
3. Only one year of data (for 2008-09 applicants) will have been collected differently from prior and future data.

- B. Option 2 - Change to the two-question format on the electronic application (EApp) and paper applications released September 1, 2009 for fall 2010 applicants.

#### Advantages:

1. Allows 18 months for planning and ensuring that all the pieces are ready for implementation in September 2009. Provides time this year to focus on the testing and implementation of the new electronic application along with its associated changes.

2. Provides time to deal with changes that may occur in the next year, such as Federal guidelines or PeopleSoft processes for storing/handling R/E data. It is doubtful that either of these will change significantly within that time frame, but the Department of Ed continues to issue additional instructions about how their guidelines should be implemented. So, an argument could be made that it would be best to wait as long as possible to make final implementation decisions.

### **General Questions:**

Our review of these issues also raised some related questions that should be considered as we discuss these options:

1. How do the options fit into campus schedules related to upgrades to PeopleSoft version 9 and implementation of PeopleSoft? Is either option a better fit with these schedules?
2. How does resurveying current students fit into these options? Could/should a common (e.g. MILER-developed) resurvey process be developed for PeopleSoft institutions or should UW's be on their own in resurveying? Could/should resurveying be mandated?
3. The new Federal guidelines separate Asians from the Native Hawaiian/Pacific Islander category. Resurveying current students should address this conversion but what should institutions do if they do not resurvey or if affected students don't respond to the survey? How should this be handled for CDR reporting and for Federal reporting?
4. UW System could begin collecting multiple race/ethnicity information on the student CDR starting with summer 2008 enrollments. This would follow the same guidelines as the current MAAD collection. Should this timeframe be maintained?
5. The new Federal reporting guidelines require that all Hispanic/Latinos (regardless of race) are reported in a separate category. As a result, the Federal "Two or more race" group excludes any Hispanic/Latino race/ethnic combinations. Should UW institutions and UW System follow these guidelines for "non-Federal" reporting? This would mean changing the rules for the assignment of a primary race/ethnicity.

## One-Question and Two-Question Models:

### Current UW one-question model:

Race/Ethnicity: Please check all that apply or the race/ethnicity you identify with most.			
<input type="checkbox"/> African-American or Black	<input type="checkbox"/> Cambodian	<input type="checkbox"/> Mexican, Mexican American, or Chicano	<input type="checkbox"/> White or Caucasian
<input type="checkbox"/> American Indian or Alaskan Native (please specify tribal affiliation)	<input type="checkbox"/> Hmong	<input type="checkbox"/> Puerto Rican	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> Hawaiian or Pacific Islander	<input type="checkbox"/> Laotian	<input type="checkbox"/> Cuban	<input type="checkbox"/> I choose not to respond
	<input type="checkbox"/> Vietnamese	<input type="checkbox"/> Other Hispanic or Latino	
	<input type="checkbox"/> Other Asian		

### Potential UW two-question model:

Race/Ethnicity: Please answer both a. and b.			
a. Ethnicity: Are you of Hispanic or Latino origin? (If yes, choose one or more from the list below.) ___ Yes ___ No			
<input type="checkbox"/> Cuban	<input type="checkbox"/> Other Hispanic or Latino		
<input type="checkbox"/> Mexican, Mexican American, or Chicano	<input type="checkbox"/> I choose not to respond		
<input type="checkbox"/> Puerto Rican			
b. Race: Choose one or more from the list below.			
<input type="checkbox"/> African-American/Black	<input type="checkbox"/> Cambodian	<input type="checkbox"/> White/Caucasian	
<input type="checkbox"/> American Indian/Alaskan Native (please specify tribal affiliation)	<input type="checkbox"/> Hmong	<input type="checkbox"/> I choose not to respond	
<input type="checkbox"/> Native Hawaiian/Pacific Islander	<input type="checkbox"/> Laotian		
	<input type="checkbox"/> Vietnamese		
	<input type="checkbox"/> Other Asian		

## Reporting Options:

### UW System New Freshman Applications for Fall 2008 as of March 1

#### Current MAAD Reporting Method

African American/Black	3,079	3.5%
Hispanic/Latino	2,076	2.4%
American Indian/Alaskan Native	436	0.5%
Southeast Asian	1,397	1.6%
Other Asian	2,155	2.5%
Hawaiian/Pacific Islander	142	0.2%
Two or more Race/Ethnicities	1,604	1.8%
Students of Color Subtotal	10,889	12.5%
White	71,283	81.7%
Other Race	505	0.6%
Unknown	1,626	1.9%
International	2,980	3.4%
Total	87,283	100.0%

Notes:

Race and Ethnicity totals are "race alone"

#### New Federal Reporting Method

African American/Black	3,079	3.5%	
Hispanic/Latino	2,546	2.9%	470
American Indian/Alaskan Native	436	0.5%	
Asian	3,552	4.1%	
Native Hawaiian/Pacific Islander	142	0.2%	
Two or more Races	1,134	1.3%	-470
Students of Color Subtotal	10,889	12.5%	
White	71,283	81.7%	
Unknown	2,131	2.4%	
International	2,980	3.4%	
Total	87,283	100.0%	

Notes:

Hisp/Lat total includes Hisp/Lat alone & any race combined with Hisp/Lat

Race totals are "race alone"

Asian total includes Southeast Asians

Unknown includes Other Race (alone)

## Initial Review Participants:

Gail Bergman, Acting Director, Office of Policy Analysis & Research, UW System Administration

Beth Weckmueller, Executive Director, Enrollment Services, UW-Milwaukee

Deborah Furlong, Policy & Planning Analyst, UW-Green Bay

Clare Huhn, Policy & Planning Analyst, UW-Madison

**Logical Listing of MAAD Data Elements**

DRAFT  
4/3/08

Number    Descriptors

TYPE I: PERSONAL

CDR  
Data  
Element  
2600, etc.

5010	Social Security Number		
5012	Campus Student ID	Sp/04	
5020	Gender		
5030	<del>Race/Ethnic Category</del>	-Sp/07	} -Sp/08
5035	<del>Race/Ethnic Sub-Category</del>	-Sp/07	
5040	Birthdate		
5050	Citizenship, Status of		
5600	Race/Ethnicity: Cuban Indicator	+Sp/07	} +Sp/08
5605	Race/Ethnicity: Mexican, Mexican-American, or Chicano/a Indicator	+Sp/07	
5610	Race/Ethnicity: Puerto Rican Indicator	+Sp/07	
5615	Race/Ethnicity: Other Hispanic/Latino Indicator	+Sp/07	
5617	Race/Ethnicity: Hispanic/Latino Indicator (Subgroup Unknown)	+A/07	
5620	Race/Ethnicity: African-American/Black Indicator	+Sp/07	
5625	Race/Ethnicity: American Indian/Alaskan Native Indicator	+Sp/07	
5630	Race/Ethnicity: Native Hawaiian/Pacific Islander Indicator	+Sp/07	
5635	Race/Ethnicity: Cambodian Indicator	+Sp/07	
5640	Race/Ethnicity: Hmong Indicator	+Sp/07	
5645	Race/Ethnicity: Laotian Indicator	+Sp/07	
5650	Race/Ethnicity: Vietnamese Indicator	+Sp/07	
5652	Race/Ethnicity: Southeast Asian Indicator (Subgroup Unknown)	+A/07	
5655	Race/Ethnicity: Other Asian Indicator	+Sp/07	
5660	Race/Ethnicity: White/Caucasian Indicator	+Sp/07	
5665	Race/Ethnicity: Other Race Indicator	+Sp/07	
5670	Race/Ethnicity: Race Unknown Indicator	+Sp/07	
5675	Race/Ethnicity: Other Race Text	+Sp/07	

TYPE II: PRE-UNIVERSITY

5090	High School Class Size	
5100	High School Class Rank	
5105	High School Class Rank Percentile	
5120	High School, Year of Graduation	
5134	Application Status	
5135	<del>Admission Category</del>	-Sp/07
5136	Admission Action	
5138	Deferred Status	
5190	Number of Competency Based Proficiencies	
5195	Competency Based Admission Decision Indicator	

TYPE III: UNIVERSITY

5160	Unit
5170	Division (UW Colleges Only)
5175	Month (Reporting)
5180	Term (Desired Term of Enrollment)
5220	Resident Status (Based on Permanent Home Address)
5240	Entrance Status
5275	Post-Baccalaureate Undergraduate

TYPE III: OTHER

5900	Tally of Late Applicants
------	--------------------------