



September 1, 2006

Mr. Patrick J. Sherrill
U.S. Department of Education
Room 6C103
400 Maryland Avenue, SW
Washington, DC 20202-0600

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Darrell G. Kirch, M.D.
President

By electronic mail: comments@ed.gov

RE: Guidance for Data on Race and Ethnicity, 71 FR 44866-71

Dear Mr. Sherrill:

The Association of American Medical Colleges (AAMC) welcomes this opportunity to comment on the Proposed Guidance on Maintaining, Collecting and Reporting Data on Race and Ethnicity to the U.S. Department of Education.

The AAMC is a nonprofit association representing all 125 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems, and 96 academic and scientific societies. Through these institutions and organizations, the AAMC represents 109,000 faculty members, 67,000 medical students, and 104,000 resident physicians. Our members are committed to promoting diversity in medical education and research, and to addressing disparities in the delivery of care among diverse communities.

The AAMC has been collecting and reporting data on race and ethnicity since the early 1970s, and we have faced many of the same issues that the Department of Education raises in its request for comments.

Following the 2000 Census, the AAMC began using the two-question format and the five racial categories prescribed in the 1997 OMB Circular Directive 15, and our member schools generally followed our lead. Both AAMC and the Census experienced problems with the two-question format, deriving from our failure to understand and appreciate aspects of Hispanic or Latino cultural identity. Many Hispanics or Latinos do not identify themselves with a race. When confronted with a separate race question, many leave the answer blank. When allowed to choose "some other race," however, as permitted by the 2000 Census and by our 2002 data collections, many Hispanics wrote in "Hispanic." We have concluded that we should use a one-question format, with Hispanic or Latino being one of the racial and ethnic categories with which respondents are invited to identify. Some Hispanic or Latino respondents will select both the Hispanic category and one or more racial categories, and others will select only Hispanic. We agree with the 1997 standard and with the proposed Department of Education standard that we are asking for *self-identification*, and the one-question, multiple-choice answer serves that end.

The Association therefore strongly recommends that the Department of Education standardize on a one-question format, with “Hispanic or Latino” as one of the multiple-choice answers.

The Association and our member institutions also encountered problems with reporting data on persons who identified with multiple racial categories. Sometimes we reported Hispanic of any race and non-Hispanic by race, with a separate non-Hispanic multiracial category. On other occasions we reported race alone and race in combination, with and without Hispanic identity. A particular complaint we heard from our members was that it was impossible to comply with requested Department of Education reporting, since the Department had not followed the OMB guidance to permit multiple racial designations. **We applaud the proposed change to now collect and report data on multiple race.**

After much deliberation, we have come to adopt a simplified approach for reporting, which we commend to your attention. There are essentially six choices, five of race and one of ethnicity. We simply report how many respondents select each category, plus an unduplicated total. Percentages selecting each category can be computed as the number selecting that category divided by the unduplicated total. This means, for example, that the percentage of students who are Black would include those students who identify themselves as both Black and Hispanic, as well as those who are Black and Native American or Black and some other race. **We recommend that the Department of Education follow this approach to reporting as well.**

We recognize that this is a radical departure from traditional methods, because the numbers in each category will not add up to the unduplicated total, and the percentages in each category will not add up to 100%, but these limitations are inherent in the multi-factorial data we are collecting. Race and ethnicity in America are complex constructs, and they do not lend themselves to a set of mutually exclusive categories.

Higher Education would certainly welcome this simplification, and it might well lead to more complete participation in Department of Education’s Integrated Postsecondary Education Data System (IPEDS). Moreover, we believe our proposed approach better serves the need to quantify participation by individuals identifying with each racial and ethnic group than does the proposed Department of Education approach. By omitting Black Hispanics and persons who are both Black and some other race from the count of Black students, for example, the true measure of Black participation is obscured and under-reported. **AAMC also follows the IPEDS approach of separating nonresident aliens, for whom we do not report race or ethnicity, and we recommend that this practice be continued.**

Attached to this comment is a copy of the AAMC analysis entitled “Adapting to Multiethnic and Multiracial Reality,, with argument supporting the decision to collect and report data differently, and with samples of medical student data reported in the new way.

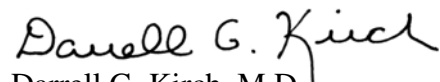
Fortunately, should the Department of Education insist on reporting by higher education institutions as proposed in the notice, our institutions, collecting data in accordance with our

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standard, will be able to comply. Both AAMC and its member medical schools retain data on each individual, and the data can be combined to report as proposed. It would be very burdensome on our institutions, however, if they were required to collect data in a two-question format, when the data we collect for them as a part of the common application service will be collected in a one-question format. **If the Department of Education is unwilling to adopt the one-question format as its own standard, we ask that the one-question format be a permitted alternative.**

We would be happy to meet with Department of Education representatives to share our experiences and insights. Questions or inquiries about this comment may be addressed to Paul Jolly, Ph.D. at 202 828 0257 or pjolly@aamc.org.

Sincerely,


Darrell G. Kirch, M.D.

Attachment to AAMC Comments on Guidance for Data on Race and Ethnicity, 71 FR 44866-71

Adapting to Multiracial and Multiethnic Reality¹

From its inception, the United States has counted its citizens to determine government representation, taxation and revenue allocations. The process of determining who is “in” and who is “out” is messy and often reflects the ugly parts of our country’s history. One of the main inadequacies of any counting method is its failure to appropriately and thoroughly address socio-cultural and political issues, thus further reinforcing the tension that surrounds the history the counting of U.S. citizens.

For most of its history, the Census allowed citizens to choose only one category to identity their race. Race was defined by skin color, religious affiliation, and indigenous description. This included such traditional racial categories as White, Black, African American or Negro, American Indian or Alaskan Native, and a variety of subcategories of Asian and Pacific Islander. It also included, at different points, Jews and Hindus. The inclusion or exclusion of a particular group or category was often based on political visibility.

In the 2000 Census, two substantial changes occurred in race and ethnicity collection. The single race question was divided into two questions that asked citizens to define themselves first by their Hispanic ethnicity and then the second question asking their racial identity. Also, within these two questions on race and ethnicity, the Census permitted respondents to select more than one racial or ethnic identity. Although in 1980, the Census introduced a new term, “ethnicity,” to exclusively define those of Hispanic/Latino origin and separate them from a racial category, the Census still instructed citizens to only choose one option among those presented on the form. This single selection requirement denied the visibility, and often, resources and justice to many citizens who were of mixed race and ethnicity.

However, since 2000, the uptake of the two question counting method and subsequent tables that reflect the two question results remains confusing and frustrating for primarily two reasons: historical trending analysis to evaluate group participation and multiple identities of individual people. The Census further complicated these problems by including a category called “some other race.” Because many Hispanic or Latino respondents considered, for good reason, that Hispanic ethnicity was in itself a racial category, they selected “some other race” from among the racial categories responses not seeing it from among the racial categories.

In 2002, following the lead of the federal government and its subsequent reporting mandate for all federal agencies, the AAMC followed suit and changed its method of counting to conform to federal guidelines as issued by Office of Management and Budget (OMB) Directive 15². For applicants in 2002, and even earlier in the MCAT registration form, AAMC followed the two question format and permitted selection of multiple races with a separate Hispanic ethnicity question. AAMC, however, did not offer a “some other race” alternative, since analysis revealed that among the Hispanic respondents a substantial number selected no racial category.

¹ This report was prepared by Paul Jolly, Gwen Garrison and Laura Castillo-Page.

² <http://www.whitehouse.gov/omb/fedreg/ombdir15.html>

Currently, we have a variety of ways we report race and ethnic data that each reflect the primary audiences' request for race and ethnic visibility in the display. To illustrate this variety of tabular styles, see the FACTS website,³ the AAMC Data Book,⁴ and DDPPs Facts & Figures,⁵ Medical School Admissions Requirements (MSAR),⁶ and Minority Student Opportunities in United States Medical Schools (2005).⁷

Given this history both at the federal level and through our own AAMC data collection system, we are considering changing our race and ethnicity collection and data displays to better inform our constituents. Since we view racial and ethnic categories as self-identification, there is no reason to force separate answers to the question of Hispanic ethnicity and racial identity. For our first proposed change, we recommend that future AAMC surveys should collect race and ethnicity in one question instead of two. Applicants can select all that apply from White, Black or African American, Hispanic or Latino, Native American or Alaskan Native, Hawaiian or other Pacific Islander, and various subcategories of Asian. Hispanic or Latino will be treated as one of the racial/ethnic identifiers, no different from the others. Respondents should be free to choose one or more of these attributes, in accordance with their identification with each racial or ethnic group. There are strong indications that the Census is coming to the same conclusion for the 2010 administration.

Second, when reporting results, we should not put all Hispanic and Latino in one category without racial identity, as we have done in the past when we reported counts by race only for non-Hispanics and when we, like the Census, used the clarification "Hispanics may be of any Race." Sometimes we report Hispanic of any race, followed by non-Hispanic race alone, and followed by a single category of multiracial. In this proposal we recommend that we treat the Hispanic or Latino category like the racial categories and report it in the same manner.

This leaves us with the question of how to report those individuals of multiple race and ethnicity. In the past, we have separated out these individuals in our data displays, labeling them as "two or more races," "multiple race" and/or "multiple ethnicity." We did this to maintain statistical relevance so that the percentages derived from the numbers would always add up to 100. However, the United States faces a society that is increasingly "mixed" both racially and ethnically. If we report separately every possible combination of major race category and ethnicity, we would report 128 distinct categories. Breaking down the data by subcategories of Asian and Hispanic, we could theoretically have thousands of possibilities. Attempting to follow some further OMB guidance, we have tried separately reporting the major multiple race categories such as Black/White and Native American/White, followed by Other Multiracial. A different alternative has been to report for each non-Hispanic racial category race alone, in combination and total, giving both a minimum count (race alone) and a maximum count (alone or in combination) for each racial category.

³ <http://www.aamc.org/data/facts/>

⁴ <http://www.aamc.org/data/databook/start.htm>

⁵ https://services.aamc.org/Publications/showfile.cfm?file=version53.pdf&prd_id=133&prv_id=154&pdf_id=53

⁶ https://services.aamc.org/Publications/index.cfm?fuseaction=Product.displayForm&prd_id=149&prv_id=175&cfid=1&cftoken=7E107D0D-EBF8-4554-84C7DE9CFC4A3B20

⁷ https://services.aamc.org/Publications/index.cfm?fuseaction=Product.displayForm&prd_id=138&prv_id=162&cfid=1&cftoken=7E107D0D-EBF8-4554-84C7DE9CFC4A3B20

The result of all this variety has combined with the complexity of the multiple response format to confuse and irritate those who look to the AAMC data for trending patterns with regard to student enrollment and diversification the physician workforce.

AAMC is considering adopting a standard presentation format for racial and ethnic data to use for all of its primary publications. While we can provide more detailed and complex tabulations for special purposes and on request, the common use of a standard form will provide guidance to our constituents and reduce confusion.

To undertake this challenge, we will need to make two paradigm shifts.

First, we need to accept that a true representation of race and ethnicity in America, taking into account the multi-ethnic and multicultural nature of our society, can not be represented by a set of mutually exclusive categories. We have to accept that a substantial number of respondents to our surveys will appear in more than one category. This leads us to the second shift: the counts in our tabulations will not “add up” to a total with a singular dominator that allows percentages to add to 100. This is a natural consequence of dealing with a multiple response, “check all that apply” question, and familiar to statisticians who deal with such questions. These two shifts will be difficult and require AAMC leadership.

We will of course continue to provide an unduplicated count of total respondents. We can, on request, provide an unduplicated count of respondents with any desired combination of attributes. For example, to measure progress in recruitment of racial and ethnic groups underrepresented in medicine, we can provide an unduplicated count of persons who are Hispanic, Black or Native American, or an unduplicated count of persons who are Hispanic, Black, Native American or Hawaiian. But these subtotals should not, in our opinion, appear in our primary reports.

Attached are prepared tables illustrating the proposed display for standard AAMC report that provide the simplest and cleanest display of the data. The report includes the number of applicants, accepted applicants and matriculants who identify with each of the six racial and ethnic categories, plus the number of foreign (non-citizen and not permanent resident) applicants and matriculants, and the number of unknown – those who did not select any race or ethnicity category.

It would be possible to use an alternative form that would still report to total number of Hispanic applicants and matriculants, but would also separately report, on request, the number of applicants and matriculants who identify themselves as Mexican, Puerto Rican, Cuban or Other Hispanic, but we don't think it should be our primary display. While some people may be interested in separate groups of Hispanics, as others may be with separate groups of Asians, we not convinced that it still makes sense to separate them in this way. In the past, when only certain categories of Hispanics were considered underrepresented in medicine, it might have made sense, but may not be relevant as the largest group of Hispanics is now “Other Hispanic.”

The total will of course be an unduplicated count. As a helpful guide to interpretation, the bottom line on all tables will be labeled All (unduplicated count). This phrase will be an indication to the user that the total will not be a simple sum of the items above it. The footnote

will also contain a statement emphasizing that some applicants and matriculants identify with more than one racial and ethnic category.

Statistically minded users, in particular statistically minded users who are not experienced with the analysis of multiple response questions, will protest that “The numbers don’t add up!” To this we should reply that racial and ethnic identity is too complex to be represented by mutually exclusive categories. Many people do not want to be classified in a single category. The new counts will not be greatly in excess of what we have published before. These changes are minimal and might not even be noticed by most people.

However, there is one exception: the case of Native Americans and Alaska Natives. Counting persons who identify themselves as Native American or Alaskan Native presents special challenges, because only twenty percent of such applicants identify themselves only in this one category. Here our statistics would radically change from previous years, and we would need to supplement the standard report with a more in-depth analysis of the data for this group, including trends in the number of people who identify themselves only in this category. A more detailed analysis of this problem appears in an appendix.

Finally, we can’t compare the new data with that from past decades; the data simply don’t permit it. Because we have allowed multiple choices in our data collections since 2002, however, we can provide trend data using the new approach, and this will allow one to monitor progress or lack of progress in increasing the participation of currently underrepresented racial and ethnic groups. If we can achieve a consensus among key stakeholders for this change, we can begin to prepare for the change, educating them on the issues and building support for the changed reporting.

Recommended Form

2002 Data

2002			
	Applicants	Accepted Applicants	Matriculants
Black	2,981	1,340	1,283
Asian	6,594	3,554	3,350
Hispanic/Latino	2,441	1,193	1,130
Native American (including AK)	381	177	156
Native Hawaiian/Pacific Islander	104	40	40
White	21,647	11,769	11,026
Unknown	1,863	910	866
Foreign	979	275	210
All (unduplicated count)	33,625	17,593	16,488

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 2,174 students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2002 Percent of All Applicants			
	Applicants	Accepted Applicants	Matriculants
Black	8.9	7.6	7.8
Asian	19.6	20.2	20.3
Hispanic/Latino	7.3	6.8	6.9
Native American (including AK)	1.1	1.0	0.9
Native Hawaiian/Pacific Islander	0.3	0.2	0.2
White	64.4	66.9	66.9
Unknown	5.5	5.2	5.3
Foreign	2.9	1.6	1.3

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 6.5% of all students considered themselves to be multiracial or multi-ethnic and selected more than one category.

2003 Data

2003			
	Applicants	Accepted Applicants	Matriculants
Black	3,063	1,274	1,205
Asian	6,956	3,614	3,460
Hispanic/Latino	2,489	1,146	1,091
Native American (including AK)	393	187	168
Native Hawaiian/Pacific Islander	119	43	42
White	22,656	11,983	11,288
Unknown	1,755	779	732
Foreign	959	264	212
All (unduplicated count)	34,791	17,542	16,541

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 2,459 students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2003 Percent of All Applicants			
	Applicants	Accepted Applicants	Matriculants
Black	8.8	7.3	7.3
Asian	20.0	20.6	20.9
Hispanic/Latino	7.2	6.5	6.6
Native American (including AK)	1.1	1.1	1.0
Native Hawaiian/Pacific Islander	0.3	0.2	0.3
White	65.1	68.3	68.2
Unknown	5.0	4.4	4.4
Foreign	2.8	1.5	1.3

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 7.1% of all students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2002-2003 Percent Increase

2002-2003 Percent Increase			
	Applicants	Accepted Applicants	Matriculants
Black	2.8	-4.9	-6.1
Asian	5.5	1.7	3.3
Hispanic/Latino	2.0	-3.9	-3.5
Native American (including AK)	3.1	5.6	7.7
Native Hawaiian/Pacific Islander	14.4	7.5	5.0
White	4.7	1.8	2.4
Unknown	-5.8	-14.4	-15.5
Foreign	-2.0	-4.0	1.0
All (unduplicated count)	3.5	-0.3	0.3

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. Some students consider themselves to be multiracial or multi-ethnic and may select more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2004 Data

2004			
	Applicants	Accepted Applicants	Matriculants
Black	3,175	1,350	1,263
Asian	7,590	3,632	3,460
Hispanic/Latino	2,545	1,242	1,175
Native American (including AK)	465	218	202
Native Hawaiian/Pacific Islander	128	40	39
White	23,623	12,251	11,556
Unknown	1,000	524	493
Foreign	1,026	272	221
All (unduplicated count)	35,735	17,662	16,648

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 2,963 students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2004 Percent of All Applicants			
	Applicants	Accepted Applicants	Matriculants
Black	8.9	7.6	7.6
Asian	21.2	20.6	20.8
Hispanic/Latino	7.1	7.0	7.1
Native American (including AK)	1.3	1.2	1.2
Native Hawaiian/Pacific Islander	0.4	0.2	0.2
White	66.1	69.4	69.4
Unknown	2.8	3.0	3.0
Foreign	2.9	1.5	1.3

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 8.3% of all students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2003-2004 Percent Increase

2003-2004 Percent Increase			
	Applicants	Accepted Applicants	Matriculants
Black	3.7	6.0	4.8
Asian	9.1	0.5	0.0
Hispanic/Latino	2.2	8.4	7.7
Native American (including AK)	18.3	16.6	20.2
Native Hawaiian/Pacific Islander	7.6	-7.0	-7.1
White	4.3	2.2	2.4
Unknown	-43.0	-32.7	-32.7
Foreign	7.0	3.0	4.2
All (unduplicated count)	2.7	0.7	0.6

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. Some students consider themselves to be multiracial or multi-ethnic and may select more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2005 Data

2005			
	Applicants	Accepted Applicants	Matriculants
Black	3,161	1,293	1,235
Asian	8,204	3,883	3,724
Hispanic/Latino	2,708	1,325	1,269
Native American (including AK)	462	200	191
Native Hawaiian/Pacific Islander	122	46	46
White	24,553	12,346	11,663
Unknown	990	534	502
Foreign	1,204	328	263
All (unduplicated count)	37,373	17,987	17,003

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 3,201 students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2005 Percent of All Applicants			
	Applicants	Accepted Applicants	Matriculants
Black	8.5	7.2	7.3
Asian	22.0	21.6	21.9
Hispanic/Latino	7.2	7.4	7.5
Native American (including AK)	1.2	1.1	1.1
Native Hawaiian/Pacific Islander	0.3	0.3	0.3
White	65.7	68.6	68.6
Unknown	2.6	3.0	3.0
Foreign	3.2	1.8	1.5

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. A total of 8.6% of all students considered themselves to be multiracial or multi-ethnic and selected more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

2004-2005 Percent Increase

2004-2005 Percent Increase			
	Applicants	Accepted Applicants	Matriculants
Black	-0.4	-4.2	-2.2
Asian	8.1	6.9	7.6
Hispanic/Latino	6.4	6.7	8.0
Native American (including AK)	-0.6	-8.3	-5.4
Native Hawaiian/Pacific Islander	-4.7	15.0	17.9
White	3.9	0.8	0.9
Unknown	-1.0	1.9	1.8
Foreign	17.3	20.6	19.0
All (unduplicated count)	4.6	1.8	2.1

Note: These data show the racial and ethnic categories with which applicants and matriculants identify. Some students consider themselves to be multiracial or multi-ethnic and may select more than one category. The row labeled All contains an unduplicated count of all applicants and matriculants.

Students Who Identify Themselves as Native American Often Claim Other Races and Ethnicities as Well

In 2005 there were 462 applicants who identified themselves as Native American, but only 94 of these claimed no other racial identity and did not identify themselves as Hispanic. In years past AAMC reports of minority participation would have identified as Native American only the 94, leaving the remainder in the multiracial or possibly the Hispanic categories. When we look at how many people identify at least partially with the Native American group, however, the proper number is 462.

More than Whites, African Americans and Asians, students who identify themselves as Native American tend to identify with more than one racial and ethnic category. Eighty-nine percent of African American applicants claim no other racial or ethnic identity, as do a like fraction of Asian applicants, compared with only twenty percent of Native American applicants.

The 368 multiracial and multiethnic Native American applicants had very mixed identities. There were 215 Native American and non-Hispanic White and 35 Native American and Hispanic White. Twenty-nine applicants identified themselves as Hispanic, but with no other races besides Native American. The twelve reported combinations of races and ethnicities for Native American applicants are displayed in the table below.

Racial and Ethnic Identities of Native American Students	
Count	Racial and Ethnic Identities
215	Native American, White
94	Native American
45	Native American, Black
35	Native American, White, Hispanic
29	Native American, Hispanic
12	Native American, White, Black
12	Native American, White, Asian
6	Native American, White, Black, Hispanic
6	Native American, Black, Hispanic
4	Native American, Asian
2	Native American, White, Asian, Hawaiian/Other Pacific Islander, Hispanic
2	Native American, Asian, Hispanic
462	TOTAL

One might wonder if at least some of those who report Native American and white might be gaming the admissions system, knowing that Native American applicants are eagerly sought by at least some medical schools. Even if they are not gaming the system, there may be little or no perceived disadvantage to claiming a Native American heritage, and even those with distant ancestor who was Native American might be inclined to so identify. Anyone who has lived in the west, especially in Oklahoma, knows that there are a large number of Americans with Native American ancestors. It is likely that the multiracial, multiethnic character of the Native American student population is very real.