



# Comparison of Race/Ethnicity Categories Collected By Selected Government Agencies with EDEN

A Report Prepared for CCSSO's  
Education Information Management Advisory Consortium  
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The purpose of this comparison is to determine whether agencies, outside the US Department of Education, that collect information directly from school districts are using the same racial/ethnic codes that EDEN is planning to use.

This analysis uses the recently released federal register notice for the racial/ethnic codes being used by EDEN. Data collections from Health and Human Services (Head Start), Department of Agriculture (National School Lunch Program), and EEOC (staff information) were looked at to determine whether the racial/ethnic codes used in these collections match how EDEN will be collecting this data.

## Summary of Findings

While one collection, EEO-1, matched exactly, the other two did not. The main difference between these collections and EDEN is that the other two collections allow for an “Other” category (and in one case there is also an “unspecified” category). It is surprising that an OMB-approved collection includes two categories that allow for no distinction of race/ethnicity. The reality of those that refuse to designate a race/ethnicity was obviously the reason for these categories by these collections.

There are some wording differences within category titles and definitions but they do not seem to be inherent differences between collections. The agencies that collect this data were not contacted as far as any plans to change these collections, or any data items within them, so the analysis only applies to the 2006 and 2007 collections.

Collection	Match with EDEN	Summary of Differences
Head Start Program Information Report (PIR) 2006–07	No	1. Allows two additional responses: “Other” and “Unspecified” 2. Wording issues: “Biracial/multi-racial” used instead of “Two or more races” and definition for Asian does not include list of countries
USDA: NSLP Verification	No	1. NSLP allows “Other” for race 2. No category definitions are provided on NSLP verification
Employer Information EEO-1 Survey (2007)	Yes	

## I. U.S. Department of Education: Education Data Exchange Network (EDEN)

Collection: EDEN 2007–08 and beyond

Collection description: EDEN is a centralized portal through which states submit their educational data on their schools and school districts to the U.S. Department of Education.

Collection race/ethnicity categories and definitions: EDEN will move to the following seven racial/ethnic categories based on the 1997 OMB guidance:

Category	Definition
Hispanic or Latino of any race	A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains a tribal affiliation or community attachment.
Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
Black or African American	A person having origins in any of the Black racial groups of Africa.
Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
Two or more races	

Source:

- United States Department of Education (2007). *Final Guidance on Maintaining, Collecting and Reporting Racial and Ethnic Data to the U.S. Department of Education*. Federal Register, Vol. 72, No. 202. October 19, 2007. Available at:  
<http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/E7-20613.htm>

## II. Health and Human Services: Head Start

Collection: Head Start Program Information Report (PIR) 2006–07

Collection description: The Head Start PIR is an OMB-approved report that collects comprehensive data on the services, staff, children, and families served by nearly 2,700 Head Start and Early Head Start programs nationwide. All programs (grantees and delegates) are required to submit a PIR for each year in which they provide services to children and families.

Summary of comparison with EDEN race/ethnicity categories and definitions: The 2006-07 Head Start PIR race/ethnicity categories and definitions differ from EDEN's in a few ways:

1. Head Start PIR allows two additional responses, "Other" and "Unspecified," which are not allowable in EDEN.
2. The category name "Biracial/multi-racial" in the Head Start PIR is used instead of "Two or more races."
3. The definition for "Asian" in the Head Start PIR does not include the list of associated countries of origin that is included in the EDEN definition.

Detailed comparison with EDEN race/ethnicity categories and definitions:

Head Start PIR	EDEN	Difference
Hispanic or Latino Origin. A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of their race.	Hispanic or Latino of any race. A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.	None
American Indian or Alaska Native. A person having origins in any of the original peoples of North and South America or Central America, and who maintains tribal affiliation or community attachment.	American Indian or Alaska Native. A person having origins in any of the original peoples of North and South America (including Central America), and who maintains a tribal affiliation or community attachment.	None
Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.	Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	Head Start PIR definition does not include specific associated countries of origin.
Black or African American. A person having origins in any of the Black racial groups of Africa.	Black or African American. A person having origins in any of the Black racial groups of Africa.	None
Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	None
White. A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	White. A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	None
Biracial/Multi-racial. A person of 2 or more races.	Two or more races.	Category names different.
Other. A person reporting a race other than those listed. (Specify in "Comments").	—	Category not in EDEN.
Unspecified. A person whose race is unknown or whose parents declined to identify their race.	—	Category not in EDEN.

Sources:

- Office of Head Start Program Information Report (PIR) site: <http://www.acf.hhs.gov/programs/hsb/programs/pir/>
- Office of Head Start Program Information homepage: <http://www.pirweb.net/>

Collection instruction samples:

Below is an excerpt from the Head Start PIR 2006-07 “PIR Form,” which serves as a reference to help Head Start programs prepare to submit their data online:

**ACTUAL ENROLLMENT BY ETHNICITY & BY RACE.**  
Please read the instructions for reporting of ethnicity and race carefully.

Ethnicity and race category is determined according to the ethnicity or race that the family chooses.

Both ethnicity and race must be reported for all children (and pregnant women in Early Head Start programs).

1. First, report the total number of enrollees whose ethnicity is Hispanic or Latino in A.21.a (i) below and the total number whose ethnicity is non-Hispanic in A.21.a (ii).

*HISPANIC OR LATINO ORIGIN* is defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, *regardless of their race.*

2. Second, specify the race of all enrollees in A.21.b, *regardless of their ethnicity.*

For example, a Black Cuban child will be counted in the Ethnicity category as “*Hispanic or Latino*” and counted in the Race category as “*Black or African American.*”

<b>Example:</b> A Head Start program whose actual enrollment of 20 children included 2 Black Hispanic, 4 White Hispanic and 14 Black Non-Hispanic children should report the following:		
<b>A.21.a Ethnicity</b>		
(i) Hispanic or Latino		6
(ii) Non-Hispanic/Non-Latino		14
<b>A.21.b Race</b>		
(i) American Indian or Alaska Native		0
(ii) Asian		0
(iii) Black or African American		16
(iv) Native Hawaiian/Pacific Islander		0
(v) White		4
(vi) Biracial or Multiracial		0
(vii) Other		0
(viii) Unspecified		0

		<i># of children/pregnant women</i>
21. OF THE TOTAL ACTUAL ENROLLMENT (A.14), the number of enrollees in the following categories of Ethnicity and Race:		
a. ETHNICITY		
<i>The sum of A.21.a (i) and A..21.a (ii) must equal Total Actual Enrollment, A.14.</i>		
i)	HISPANIC OR LATINO ORIGIN	
ii)	NON-HISPANIC/NON-LATINO ORIGIN	
b. RACE		
<i>The sum of A.21.b (i) through A.21.b (viii) must equal TOTAL ACTUAL ENROLLMENT, A.14.</i>		
i)	AMERICAN INDIAN OR ALASKA NATIVE. A person having origins in any of the original peoples of North and South America or Central America, and who maintains tribal affiliation or community attachment.	
ii)	ASIAN. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.	
iii)	BLACK OR AFRICAN AMERICAN. A person having origins in any of the Black racial groups of Africa.	
iv)	NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	
v)	WHITE. A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	
vi)	BIRACIAL/MULTI-RACIAL. A person of 2 or more races.	
vii)	OTHER. A person reporting a race other than those listed. (Specify in "Comments").	
viii)	UNSPECIFIED. A person whose race is unknown or whose parents declined to identify their race.	
Race Comments:		
<ul style="list-style-type: none"> <li>▪ Comments are required if any other races are reported in question A.21.b(vii)</li> </ul>		

### III. USDA: National School Lunch Program (NSLP)

Collections:

- Free and Reduced Price School Meals Family Application and Verification (2006)
- School Food Authority Verification Summary Report

Collection description:

The USDA’s Child Nutrition Division *does not* routinely collect racial and ethnic data from education agencies for the NSLP. The eligibility application and verification forms supplied to districts by the USDA, “Free and Reduced Price School Meals Family Application and Verification,” are provided to the district’s households. The application form includes an *optional* question on race and ethnicity. However, the USDA does not require state education agencies to report these data. On this application form, the optional race/ethnicity question is presented as follows:

<b>Part 6. Children’s racial and ethnic identities (optional)</b>		
<u>Mark one or more racial identities:</u>		<u>Mark one ethnic identity:</u>
<input type="checkbox"/> Asian	<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Hispanic or Latino
<input type="checkbox"/> White	<input type="checkbox"/> Native Hawaiian or Other Pacific Islander	<input type="checkbox"/> Not Hispanic or Latino
<input type="checkbox"/> Black or African American	<input type="checkbox"/> Other	

Using this form, data are collected from households to verify eligibility for the National School Lunch Program. Alternatively, school districts may use data from other public programs (e.g. Food Stamp, Temporary Assistance for Needy Families, or Food Distribution Program on Indian Reservations benefits) to verify NSLP eligibility.

States use the “School Food Authority Verification Summary Report” to submit data to the USDA for the NSLP. This form does not include race/ethnicity data and states are not required to submit such data. However, states do sometimes attach race/ethnicity data to their submissions and these data are stored by the USDA. USDA staff reported that, during state administrative reviews, the USDA's Food and Nutrition Services (FNS) division does review and evaluate the racial and ethnic data stored in state systems. Specifically, to ensure civil rights compliance, the FNS reviews the state’s system to ensure "that each local agency annually collects and maintains on file for three years actual beneficiary data by racial/ethnic category for each facility under its jurisdiction."

Summary of comparison with EDEN race/ethnicity categories and definitions:

There are two discrepancies between the race/ethnicity categories and definitions in the Free and Reduced Price School Meals Family Application and Verification and EDEN collections:

1. The NSLP form includes the racial category “Other,” which is not an allowed response in EDEN.
2. The NSLP form does not include definitions for the race/ethnicity categories.

Detailed comparison with EDEN race/ethnicity categories:

<b>NSLP Family Application and Verification</b>	<b>EDEN</b>	<b>Difference</b>
Hispanic or Latino	Hispanic or Latino of any race. A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.	No definition is provided on NSLP form.
American Indian or Alaska Native	American Indian or Alaska Native. A person having origins in any of the original peoples of North and South America (including Central America), and who maintains a tribal affiliation or community	No definition is provided on NSLP form.

	attachment.	
Asian	Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	No definition is provided on NSLP form.
Black or African American	Black or African American. A person having origins in any of the Black racial groups of Africa.	No definition is provided on NSLP form.
Native Hawaiian or Other Pacific Islander	Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	No definition is provided on NSLP form.
White	White. A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	No definition is provided on NSLP form.
(Respondents offered option of selecting multiple races)	Two or more races.	None
Other	—	Category not in EDEN.

Sources:

- Free and Reduced Price School Meals Family Application and Verification (2006): [http://www.fns.usda.gov/cnd/Application/2006\\_Application.pdf](http://www.fns.usda.gov/cnd/Application/2006_Application.pdf). This form can be distributed by districts to households and contains an optional race/ethnicity question. The USDA School Meals page, which contains a link to this application document, is at <http://www.fns.usda.gov/cnd/FRP/frp.process.htm>.
- School Food Authority Verification Summary Report – FNS 742: Available at [http://www.fns.usda.gov/cnd/Governance/Forms/SFA\\_Verification\\_Summary.pdf](http://www.fns.usda.gov/cnd/Governance/Forms/SFA_Verification_Summary.pdf). This summary form is completed by SEAs and does not ask for racial or ethnic data.

#### IV. Equal Employment Opportunity Commission (EEOC): Staff data

Collection: Employer Information EEO-1 Survey (2007)

Collection description: The Employer Information EEO-1 survey is conducted annually under the authority of Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e, et. seq., as amended. All employers with 15 or more employees are covered by Title VII and are required to keep employment records as specified by Commission regulations. Based on the number of employees and federal contract activities, certain large employers are required to file an EEO-1 report on an annual basis.

Summary of comparison with EDEN race/ethnicity categories and definitions: There are no discrepancies between the race/ethnicity categories in the EEO-1 and EDEN collections. This is by design. Note that in its “Final Guidance on Maintaining, Collecting and Reporting Racial and Ethnic Data to the U.S. Department of Education,” USED cites its intention to use “the same reporting categories used by the Equal Employment Opportunity Commission (EEOC), so that educational institutions and other recipients can use the same reporting requirements for students and staff” in order to minimize the burden of implementation.

Detailed comparison with EDEN race/ethnicity categories and definitions:

EEO-1 Survey	EDEN	Difference
Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.	Hispanic or Latino of any race. A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.	None
American Indian or Alaska Native (Not Hispanic or Latino) - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.	American Indian or Alaska Native. A person having origins in any of the original peoples of North and South America (including Central America), and who maintains a tribal affiliation or community attachment.	None
Asian (Not Hispanic or Latino) - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	None
Black or African American (Not Hispanic or Latino) - A person having origins in any of the black racial groups of Africa.	Black or African American. A person having origins in any of the Black racial groups of Africa.	None
Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino) - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	None
White (Not Hispanic or Latino) - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	White. A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	None
Two or More Races (Not Hispanic or Latino) - All persons who identify with more than one of the above five races.	Two or more races.	None

Sources:

- 2007 EEO-1 Survey page: <http://www.eeoc.gov/eeo1survey/index.html>.

- STANDARD FORM 100, REV. January 2006, EMPLOYER INFORMATION REPORT EEO-1. Available at <http://www.eeoc.gov/eeo1survey/2007instruct.html>.
- Final EEO-1 Form, beginning 2007, Section D (All revisions to the EEO-1 survey form are in 'Section D- Employment Data' only. Sections A, B, C, E, F, and G remain unchanged.): [PDF \(Preferred\)](#) | [HTML](#)

Collection instruction samples:

Below is an excerpt from the EEO-1 survey STANDARD FORM 100, REV. (January 2006), which presents instructions for employers who fill out the survey.

**4. RACE AND ETHNIC IDENTIFICATION**

Self-identification is the preferred method of identifying the race and ethnic information necessary for the EEO-1 report. Employers are required to attempt to allow employees to use self-identification to complete the EEO-1 report. If an employee declines to self-identify, employment records or observer identification may be used.

Where records are maintained, it is recommended that they be kept separately from the employees basic personnel file or other records available to those responsible for personnel decisions.

Race and ethnic designations as used by the Equal Employment Opportunity Commission do not denote scientific definitions of anthropological origins. Definitions of the race and ethnicity categories are as follows:

**Hispanic or Latino** - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

**White (Not Hispanic or Latino)** - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

**Black or African American (Not Hispanic or Latino)** - A person having origins in any of the black racial groups of Africa.

**Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino)** - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**Asian (Not Hispanic or Latino)** - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

**American Indian or Alaska Native (Not Hispanic or Latino)** - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

**Two or More Races (Not Hispanic or Latino)** - All persons who identify with more than one of the above five races.