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TO: Segmental Advisory Council

FROM: Barbara Schmertz, Director of Research and Policy Analysis

DATE: January 2, 2020

SUBJECT: Statewide and Institutional Reporting of Multi-Race (Two or More Races) Data

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". The proposed changes were necessary for the Department to implement the Office of Management and Budget's (OMB) 1997 Standards for Maintaining, Collecting and Presenting Federal Data on Race and Ethnicity. The Integrated Post-secondary Education Data System (IPEDS) adopted new aggregate categories for reporting data in accordance with the final guidance. Educational institutions and state agencies were to implement a rollout of these changes reflecting this guidance, with full implementation for the 2010-2011 fiscal year.

This change in race and ethnicity data collection and reporting resulted in additional categories.

Old Standards (five categories, plus Foreign/ Non-Resident Alien, Unknown/Other; respondents could only select one)¹	Revised Standards (seven categories, plus Foreign/ Non-Resident Alien, Unknown/Other; respondents could select as many as applicable)²
Hispanic	Hispanic of any race
Black or African American	Black or African American (only non-Hispanic)
American Indian or Alaskan Native	American Indian or Alaskan Native (only non-Hispanic)
Asian/Pacific Islander	Asian only (only non-Hispanic)
	Hawaiian Native or Other Pacific Islander (only non-Hispanic)
White	White (only non-Hispanic)
	Two or More Races (only non-Hispanic) – no comparable category in Old Standards
Foreign/Non-Resident Alien	Foreign/Non-Resident Alien
Unknown/Other	Unknown/Other

Concern arose among Maryland institutions that these reporting changes, specifically the inclusion of a Two or More Races category, would result in significant alterations to the counts of subgroups of students within cohorts and distort reporting outcomes in ways that would confuse stakeholders and consumers of the data.

¹ 1977 Standards

² 1997 Standards, fully implemented in 2010

In response, in 2008, the Maryland Higher Education Commission (MHEC) convened workgroups consisting of representatives from all segments of higher education to discuss a number of changes to reporting requirements, including the implementation of the collection of race and ethnicity³ and the presentation of new race and ethnicity data to the public.⁴ Their efforts focused on the development of uniform terms and definitions, uniform methods for reporting data, and resources to assist institutions in educating various groups about how to interpret and use data under the new federal aggregation methods.⁵ In addition, alterations to the federal aggregation methods were discussed.

As a result, MHEC and institutions adopted a variation on the federal aggregated method. This schema encouraged institutions to report non-Hispanic respondents who identify with multiple racial groups among specific groups under certain circumstances. Specifically, a non-Hispanic respondent who identified with two race groups, one of which was white, would be included with the non-white group: for example, a respondent who identified as Asian and white would be classified as Asian, and a respondent who identified as African American and white would be classified as African American. Respondents who identified with two non-white groups, or with three or more groups of any kind, would be classified as Two or More Races.

In 2016, MHEC, in collaboration with members of the workgroup, the Data Advisory Group⁶, completed an analysis comparing the results of this modified reporting schema and results following the standard federal aggregated method. From their findings, the group recommended the discontinuation of the use of this adjusted race and ethnicity reclassification method and the full adoption of the federal aggregated method.

MHEC has made this transition in its own reporting and has recalculated data published after 2010 to follow this federal aggregated method. Institutions are to follow suit, if they have not done so already, and are encouraged to employ explanatory paragraphs and footnotes in order to communicate changes to consumers and stakeholders. They may or may not wish to recalculate earlier data.

³ Maryland Higher Education Commission, "2010 (and 2009) Reporting Revisions, Statewide Workgroup," January 2009.

⁴ Maryland Higher Education Commission, "Recommendations for the Standard Reporting of Multi-Race Data, 2010 Research Analysis Workgroup," July 2010, archived at http://www.mhec.maryland.gov/publications/research/2010Studies/2010_Final%20Recommendations_July2010.pdf

⁵ In 2007, the US Department of Education issued guidance and standards with respect to the collection and reporting of race and ethnicity data in postsecondary education. Existing race and ethnicity categories were modified, and individuals were allowed to report their identification in multiple categories. Institutions were directed to allow individuals to identify themselves with any or all of five race categories, and to maintain these individual category data in order to permit multiple types of reporting and analysis. This federal reporting structure went into effect in 2010.

⁶ In 2013, the Commission created a standing workgroup called the Data Advisory Group. This group is comprised of representatives from colleges and universities as well as segments of higher education, and meets with Commission staff to consider issues regarding data collection and reporting within the State. In 2016 the Commission, working in conjunction with the Data Advisory Group, conducted a review of the recommendations discussed in this memo.