DCHS Operations Procedure
Department of County Human Services
Multnomah County

Policy Title:	**DCHS Race/Ethnicity Data Collection Policy**
Policy Number:	**OPP 14**
Approved By:	**Susan Myers, Director**
Effective Date:	**July 31, 2012**

I. PURPOSE:

This policy establishes a standard for the collection of race and ethnicity data for activities, programs and systems within DCHS. The policy was developed as a part of the Visibility Initiative, an internal department workgroup, to identify DCHS racial and ethnic disparities in access, services and program outcomes. This data standard was based on recommendations from the Coalition of Communities of Color to identify commonly marginalized and under-recognized populations including the African, Middle Eastern and Slavic communities, in addition to more accurately identifying groups including the African American/Black and Hispanic communities (Coalition of Communities of Color- Unsettling Profile Report.) This policy mandates that race/ethnicity data be collected in accordance with the new standard in all future data systems, surveys and upgrades of current data systems. This policy does not supersede state, federal and other funder requirements regarding the collection of race/ethnicity data, but was designed to be compatible with such requirements.

II. CONTACT:

DCHS Director's Office, 503.988.4472

III. PERSONS AFFECTED:

Program managers and staff will collaborate with evaluators and data analysts to implement the data standard in the collection of client race and ethnicity data in their respective programs/systems.

IV. WORK RULE:

This policy mandates that race/ethnicity data shall be collected in accordance with this standard in all future data systems, surveys, ad hoc data collection and new iterations of current data systems. Program leadership will collaborate with their evaluation staff to develop a timeline for implementation of the standard. This policy does not supersede state, federal

and other funder requirements regarding the collection of race/ethnicity data, but was designed to be compatible with such requirements.

Key Principles

1. Self-identify - Clients will be provided the opportunity to self-identify their race/ethnicity. When clients are unable to self-identify, the program will collaborate with evaluators to determine if and how these data will be gathered, and when it is appropriate to collect data from a surrogate decision-maker (including parent or caregiver).
2. Multiple identities - Clients will be given the opportunity to choose more than one racial or ethnic identity. Systems often require that clients choose only one race, despite the fact that they might be multiracial. To most accurately describe our client populations, it is essential that clients be able to identify as more than one race. Including a "multiracial" or "other" category is not acceptable as this does not reveal the races of these individuals and keeps them invisible.
3. Consistency with reporting requirements - Any data collected by programs must meet the reporting requirements of funders, including, but not limited to, the state and federal governments. For that reason, data collected under this policy must be consistent with state (DHS Policy) and federal (OMB Policy) policies. The DCHS Race/Ethnicity Data Collection Policy is in compliance with both state and federal policies. The 'primary race identity' question is optional when state and federal standards don't apply.
4. Granularity - This data standard includes the minimum categories to be used. Programs and systems may include additional ethnic or racial identities to better understand the communities which they are serving, but the inclusion of additional identities should be balanced with the usefulness of these more detailed data. If programs choose to include additional identities, they are obligated to disaggregate program data using these more granular identities. Also, these additional identities must be able to 'roll-up' into one of the mandated identities.
5. Flexibility - The chosen race and ethnicity categories included in our inclusive identity question reflect the current makeup of local populations as well as the recommendations of the Coalition of Communities of Color. These categories may be revised in the future as the populations in the county change and as our shared understanding of race and ethnicity develop. The 'primary race identity' question allows for the collection of race data which

requires single identification and meets the state and federal requirements to collect these data.

6. Visibility - Recent US Census data, as well as community feedback, suggest that Latinos in the US do not distinguish between race and ethnicity when responding to surveys. The historic collection of ethnicity (Latino/Hispanic) separate from race marginalizes this population. Therefore, our policy includes race and ethnicity identities in one question. Client responses to the inclusive race/ethnic identity question can be used to meet both the state and federal requirement for the reporting of separate ethnicity data. Clients identifying as Latino/Hispanic will be reported as such, and all those who do not identify as Latino/Hispanic will be reported as 'not Latino/Hispanic'.

DCHS Race/Ethnicity Data Standard:

1. ***Inclusive Race/Ethnic Identity:***

What is your race or origin? Mark as many boxes as appropriate.

- ☐ *African*
- ☐ *Asian*
- ☐ *Black/African American*
- ☐ *Latino/Hispanic*
- ☐ *Middle Eastern*
- ☐ *Native American or Alaska Native*
- ☐ *Native Hawaiian or Pacific Islander*
- ☐ *Slavic*
- ☐ *White*
- ☐ *Decline to answer*

2. ***Primary Race Identity:***

State and federal standards require that you choose a single identity. Please choose one identity below:

- ☐ *American Indian or Alaska Native*
- ☐ *Asian*
- ☐ *Black/African American*
- ☐ *Native Hawaiian or Pacific Islander*
- ☐ *White*
- ☐ *Decline to answer*

V. PROCEDURE

The implementation of this data standard requires far more than changes in data systems. Data collection forms and procedures will need to change to accommodate the collection of these data. Also, staff responsible for the collection of these data from clients will need training to build the knowledge and skills necessary to collect these data reliably. Guidelines

for the analysis and reporting of program performance data disaggregated by race will be provided.

Data System Implementation

This data standard will be implemented in all newly developed data systems, as well as in ad hoc surveys of clients, staff and our community. Implementing this standard in existing data systems should be rolled into other planned system upgrades and iterations as they occur. When programs and systems are required to use external data systems, implementing this standard may not be possible. While this is an opportunity for program staff to advocate for improvement in those external systems, these programs are not expected to implement the data standard.

In concert with data system changes, program staff, information technology (IT) staff and Visibility Initiative workgroup members shall collaborate to update data collection forms, both paper and electronic, to comply with this policy.

Data Collection Training

An essential component of implementing this data standard is providing the support, knowledge and skills necessary for staff to collect these data. Visibility Initiative workgroup members will create division-specific training materials in collaboration with division staff. Training materials discuss the data standard, address the key decision points in collecting these data, and discuss how collecting reliable race and ethnicity data allows us to identify racial and ethnic disparities in services so that we can work toward eliminating these disparities. Support will also be provided in how to respond to frequently asked questions when asking clients to report their race and ethnicity.

Contracting

The initial implementation will focus on those internally provided services. An implementation plan for contracted providers will occur in a second phase and will be developed in collaboration with business services, program staff and providers.

Data Analysis

Guidelines for the analysis of race and ethnicity spell out how to summarize and report these data to best describe the client populations served and to identify disparities in access, service usage and outcomes. This policy asserts a more complex measure of race and ethnicity that requires a more carefully constructed analysis and display of race and ethnicity information.