

The Case for Improved Racial and Ethnic Public Health Data Collection Practices to Reduce Racial Disparities in Health

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6 Note: Line numbers are included along the left to help quickly identify specific text within the

7 *policy brief.*

Abstract

Racial disparities in health in the United States are largely the result of long-standing structural 8 determinants that are deeply embedded into our nation's institutions, policies, and social 9 norms. Race as a social construct influences people's prospects for well-being before they are 10 even born, with racial disparities in health persisting for centuries. Domestically, race is a 11 bigger predictor of someone's health outcomes than socioeconomic status, zip code, creed, or 12 political leaning. The COVID-19 pandemic elucidated the existing barriers to health and how 13 deleterious the consequences of unmitigated inequities were in populations with certain racial 14 and/or ethnic identities. As such, data collection for public health resource allocation and 15 16 intervention design should seek to uncover opportunities to tailor programming efforts that meet the needs of groups who have long been structurally underserved, neglected, and 17 mismanaged. In a nation as diverse as the United States, collecting racial and ethnic 18 demographic data without granularity can contribute to masking existing inequities and erasing 19 the experiences of various subpopulations. While the Office of Management and Budget's 20 recent move to update the federal standards for collecting information on race and ethnicity has 21 improved data collection for a few groups, this policy statement seeks to explore opportunities 22 to enhance public health racial and ethnic data collection efforts for more meaningful and 23 sustainable interventions that forge a path toward health equity. 24



25 Keywords: data collection; racial and ethnic identity data; health equity, and health disparities.

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Relationship to Existing APHA Policy Statements

27	• APHA Policy Statement 20227: A Strategy to Address Systemic Racism and Violence as
28	Public Health Priorities: Training and Supporting Community Health Workers to
29	Advance Equity and Violence Prevention
30	• APHA Policy Statement 20218: Call for Urgent Actions to Address Health Inequities in
31	the U.S. Coronavirus Disease 2019 Pandemic and Response
32	• APHA Policy Statement 202116: Ensuring Equity in Transportation and Land Use
33	Decisions to Promote Health and Well-Being in Metropolitan Areas
34	• APHA Policy Statement LB20-04: Structural Racism is a Public Health Crisis: Impact on
35	the Black Community
36	• APHA Policy Statement 20189: Achieving Health Equity in the United States
37	• APHA Policy Statement 200311: Opposition to Eliminating or Compromising the
38	Collection of Racial and Ethnic Data by State and Local Public Institutions
39	• APHA Policy Statement 20017: Research and Intervention on Racism as a Fundamental
40	Cause of Ethnic Disparities in Health
41	• APHA Policy Statement 20005: Effective Interventions for Reducing Racial and Ethnic
42	Disparities in Health

Problem Statement

The primary focus of the field of public health is to promote health and prevent disease. To mitigate health disparities, a particular type of health difference linked with social, economic, and/or environmental disadvantage, public health data sets must have comprehensive and consistent information related to race and ethnicity.[1] Health disparities in the United States are largely the result of cumulative disadvantages people with minoritized racial and ethnic identities experience as a result of structural racism.[2] It is well understood in the field of public health



that chronic disease morbidity and mortality rates vary by race and ethnicity; even when the incidence of disease is lower, the prognosis is worse for certain subpopulations.[3] This is largely due to social and political determinants of health that are mediated by structural racism, the macro-level factors that restrict the opportunities, resources, power, and overall well-being of individuals, communities, and entire populations as a result of their race and/or ethnicity.[4–6]

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In the United States, public institutions collect racial and ethnic data to better understand the 55 demographics of the nation; the United States remains one of the few wealthy countries to 56 57 prioritize this practice. Globally, there are not consistent practices for collecting racial and ethnic data because of reasons such as legality, different social constructs for race and ethnicity, and 58 regional differences in the composition of the population.[7] Context-specific comprehensive 59 data sets allow for a more refined assessment of the public health effects of structural racism.[4-60 6] For example, structural factors such as residential segregation and redlining have been 61 associated with racial disparities in health related to adverse birth outcomes, asthma, diabetes, 62 63 and food insecurity.[8] While the concepts of race and ethnicity are not unique to the United States, how the country collects data on a concept socially constructed and operationalized 64 65 domestically has to be right-sized to serve the public health needs of our nation. Currently, White Americans constitute nearly 60% of the population.[9] However, projection tables released by 66 the U.S. Census Bureau in 2023 indicate that, by 2050, individuals with minoritized racial and/or 67 ethnic identities will represent the largest share of the population.[9] The absence of 68 comprehensive racial and ethnic data hinders the field of public health from adequately 69 70 addressing chronic and worsening racial disparities in health.[10]

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As our nation's diversity increases, public health data collection practices must be dynamic to capture the changing demographics of our nation and ensure that disparities are not masked by larger racial and/or ethnic groupings. The Office of Management and Budget (OMB) initially created Statistical Policy Directive No. 15 (SPD 15): Standards for Maintaining, Collecting, and



Presenting Federal Data on Race and Ethnicity in 1977 to ensure consistent data on race and ethnicity across the federal government by establishing minimum reporting categories.[11] Since 1977, SPD 15 has been revised to include a separate ethnicity question (in 1997), to allow the selection of multiple categories (in 2000), and to adjust language, include the Middle Eastern or North African category, and combine the questions for race and ethnicity (in 2024).[11]

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While the recent federal revisions were long overdue, public health practitioners must take action 82 alongside the federal government to ensure that our race and ethnicity data collection practices 83 84 inform action to reduce racial disparities in health. As indicated by the Robert Wood Johnson Foundation, without disaggregated public health data sets, it is challenging to identify or address 85 the needs of racial and ethnic subpopulations experiencing health inequities.[12] Localities with 86 larger populations of diverse communities have recently demonstrated the need for this 87 88 disaggregation: New York City released a series of reports documenting health differences within Latine, Black, and Asian populations.[13–15] 89

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Public health practitioners are well positioned to forge a path toward improved racial and ethnic 91 data collection practices. As major funders, including the U.S. government, move toward data-92 driven resource allocation, the effects of data genocide and underrepresentation of racial/ethnic 93 groups within the country's data infrastructure will continue to have short- and long-term 94 consequences. The current approaches to capturing race and ethnicity data do not take into 95 96 account the differences within subgroups of populations, and it is time for public health to move beyond the minimum and set a standard for collecting race and ethnicity data that seeks to 97 98 achieve health equity and advance social justice for all.



Evidence-Based Strategies to Address the Problem

- 99 There are several strategies that can improve the collection of race and ethnicity data.
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101 Establish public health racial and ethnic data collection standards

102 The most immediate opportunity resides in establishing consistent public health data collection standards. Although the recently updated OMB race and ethnicity data standards are a sign of 103 progress for some racial and ethnic subgroups at the federal level, concerns remain. For example, 104 the addition of Middle Eastern or North African as a new minimum category distinct from the 105 White racial category is an improvement across broader racial groups: The lack of a racial 106 identifier for this has masked disparities in COVID-19 cases, gestational diabetes, and preterm 107 births in this population.[16] However, implementation of the new category will take time for 108 updated data infrastructure and improved understanding of included populations. Also, the 109 controversial decision to merge race and ethnicity into a single question to encourage more 110 complete data collection among the U.S. Latine population does little to rectify how members of 111 112 this population view themselves in the data: Data from the 2020 census indicate that 43.6% of the Latine population either skipped the race question or selected "some other race," suggesting 113 114 that a more nuanced data collection issue exists beyond instrument design.[17,18]

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Aside from these two significant updates, language adjustments in the OMB revision will likely 116 do little to improve data collection for the groups most at risk for racial disparities in health. For 117 118 example, the revised proposal makes a recommendation to remove Negro from the expanded description of the Black or African American racial category but does not provide additional 119 120 recommendations on how to better capture the diversity of this racial group beyond that change.[11] Within the context of public health, Black Americans who are descendants of chattel 121 122 slavery have poorer health outcomes than Black immigrants or their descendants.[19] In an examination of cardiovascular disease risk factors among Black immigrants and African 123



Americans, the American Heart Association asserted that data on the Black population in the

¹²⁵ United States should be, at minimum, disaggregated by ethnicity and country of origin to inform

126 public health strategies to reduce health disparities.[20]

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128 There are also stark intragroup differences within the Asian American population that will continue to be masked if more granular public health data collection methods are not deployed. 129 The Asian American population currently represents dozens of ethnic groups with major wealth, 130 education, and health gaps by region and country of origin.[21] A New York City examination of 131 132 the health burden of COVID-19 revealed that Chinese Americans had the highest mortality of all racial and ethnic groups assessed and that South Asians had the highest infection rate within the 133 Asian American population.[22] Had more granular data collection practices been deployed 134 earlier in the pandemic, these disparities across subgroups may have been mitigated by more 135 136 tailored messaging and interventions.

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There are numerous public health data issues when it comes to Indigenous communities, 138 including poor data quality due to aggregation, a lack of clarity regarding definitions of who is 139 American Indian or Alaska Native, exclusion from data collection altogether, and confusion 140 about the political status held by citizens of tribal nations separate from race or ethnicity.[23,24] 141 Described by Native American communities as "data genocide," the elimination, erasure, 142 misclassification, and concealment of populations from public health data perpetuate structural 143 144 racism and impact progress toward health equity.[25] Data genocide has also been named as a threat to health equity for people currently categorized under the Native Hawaiian or Pacific 145 Islander group. On the island of Hawaii, there are data collection challenges with respect to 146 aggregating Native Hawaiians and Pacific Islanders. In a 2021 survey, 71% of Native Hawaiians 147 identified with at least one other race, rendering more than half of the Native Hawaiian 148 population invisible when single multiracial categories were used. [26] Furthermore, an 149



examination showed that any health disparities that are present between Pacific Islanders and

151 Native Hawaiians are masked when their groups are combined.[26]

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Collecting data for public health planning, programming, and prevention efforts requires more 153 154 nuanced efforts than what is currently mandated by the OMB. In addition, according to a report on data completeness and standards conducted by Grantmakers in Health and the National 155 Committee for Quality Assurance, only four of the 10 programs reviewed used the same 156 standards.[27] The standards most commonly used for collecting race and ethnicity data are the 157 158 OMB standards; even more discouraging, only four programs provided complete race and ethnicity data, with two of those programs using OMB's standards.[27] As such, an evidence-159 based strategy to improve the public health collection of race and ethnicity data must focus on 160 improving the completeness of racial and ethnic data collection practices and establishing 161 standards for consistency beyond the existing minimum standards. 162

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The Council for State and Territorial Epidemiologists recently released recommendations for 164 addressing racial/ethnic COVID-19 data gaps that can be extended to public health data at 165 large.[28] These recommendations include (1) mitigating patient hesitancy in providing data; (2) 166 encouraging providers to collect data; (3) improving information system capacity to collect, 167 manage, process, and transmit data; and (4) improving public health agency resources and 168 staffing.[28] Prior to the release of these recommendations, localities had demonstrated success 169 in improving the completeness of this information. During the COVID-19 pandemic, the New 170 York City health department made meaningful improvements with respect to inclusion of 171 racial/ethnic information in health data.[29] Although unable to ensure that providers adhered to 172 the standards in the way they collected data, this approach did demonstrate the feasibility of 173 health systems improving the completeness of their data using existing data infrastructure, even 174 in emergency conditions.[29] In addition, New York City publicly reported the percentage of 175 176 missing racial/ethnic data on their online COVID data portal, providing the general public with



information on how the data are used. Ensuring that people understand how and why their data

- are being used and providing the data back to them are critical steps in earning the trust required
- 179 for people to provide data.
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Prioritize self-reported data as the gold standard and improve completion of racial and/or ethnic data sets

To improve the completeness of race and ethnicity data in federal health programs, self-reported 183 data must be prioritized in data collection practices. While administrative reporting has been 184 used to create efficiency in data collection, reliance on this type of reporting as opposed to self-185 reporting has had inconsistent validity across racial groups with dangerous implications in terms 186 of racial disparities in health.[30] For example, a 2020 examination revealed that Medicare 187 administrative data sources such as observational data models and causal modeling methods had 188 high validity for the African American/Black population and low validity for the Indigenous 189 population.[30] Given the changing demographics of our nation, such as a 276% increase in the 190 size of the multiracial population since 2010, prioritizing self-reported data is the most accurate 191 approach to collecting racial and ethnic data.[31] In addition, misclassification of race and 192 ethnicity can mischaracterize the burden of health disparities. One examination showed that the 193 number of Asian American and Pacific Islanders with dementia and diabetes was 194 underestimated, while there was overattribution in the Latine population when race variables 195 rather than self-reported data were used.[30] Failure to use self-reported data can affect the 196 precision of resource allocations and public health programming designed to reduce racial 197 disparities in health. 198

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As a social construct, racial and ethnic identity is a complicated domain. For example, the minimum national standards for racial/ethnic data collection include combinations of race, ethnicity, national origin, sociopolitical identity, and more. Because of this fluctuating social construction, individuals have the potential to change the way they disclose their racial/ethnic



identity over time, which can depend on the way the data are collected, the entity collecting the 204 data, and the way the individuals providing information are perceived.[32] In situations in which 205 206 individuals are able to provide more detailed racial and ethnic data, the data are often aggregated by the data collector in ways that mask health inequities or in ways that are incompatible with 207 communities themselves.[33] As technology advances, there are ample opportunities for data 208 scientists to leverage newly developed data management efficiencies to reduce the reliance on 209 210 collecting aggregated data at the individual level. For example, by providing an option for individuals to self-identify in an open-answer question, data scientists can process the 211 212 information on the back end to allow numerous ways to categorize it.[34] 213 214 To prioritize self-reported data, public health institutions must move from passive to more active approaches, including establishing data collection completeness targets (e.g., improving racial 215 and ethnic data completeness to 90%), creating organizational policies around data collection, 216 and equipping data collectors with the necessary training and scripts to reduce hesitancy. The 217 American Hospital Association has developed a toolkit for eliminating health care disparities; in 218 this toolkit, a response matrix is provided that offers a script for data collectors that is culturally 219

- competent and respectful.[35] The American Medical Association also encourages the use of
 scripts and procedures that empower patients by telling them how the information will be used
- and why it is meaningful to ensure that they receive the best care available.[36]
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Use participatory action research (PAR) to adapt to and maintain dynamic definitions of race and ethnicity

- 226 While federal definitions and standards for the collection of data on race and ethnicity may
- remain unchanged for decades, this does not necessarily align with the way people experience
- and self-define their racial/ethnic group membership or the way our nation's racial and ethnic
- composition evolves. Race, as a social construct, is nuanced and dynamic; languages and
- experiences will differ across generations and geographies and within groups. To ensure cultural



sensitivity and validity, public health racial and ethnic data collectors should review existing
instruments.[37] Although the established minimum standards set by the OMB are a good
baseline to build from, there are additional approaches that are more adaptable to the dynamic
definitions of race and ethnicity.

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PAR is a partnership approach to research that involves community members, organizational 236 representatives, and researchers in all aspects of the research process, including leadership and decision 237 making.[38,39] All partners contribute their expertise and share responsibilities and ownership of 238 239 projects designed to enhance understanding of a topic as well as integrate the knowledge gained with action to improve the health and well-being of community members. PAR is a highly feasible and 240 powerful approach that leverages a variety of modalities, such as quantitative research, photovoice, and 241 storytelling, that can contribute to filling gaps in public health knowledge, direct the focus of research 242 to community priorities, identify barriers communities face that impact their ability to achieve wellness, 243 bring forward community-specific solutions to ongoing health challenges, and offer benefits to the 244 245 participants themselves.[38,40-42]

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Data scientists, researchers, and public health practitioners can leverage PAR to investigate community-relevant research questions, develop community-meaningful racial/ethnic subgroups, and more. If open-answer data collection is unfeasible, PAR can be used to create the data collection instrument and a racial/ethnic data collection tool that is acceptable to the community. Creating a more inclusive data collection approach can improve future opportunities to compare data over time as social constructs change and particularly as multiracial/ethnic communities grow.

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Train public health researchers and practitioners to responsibly and respectfully collect racial and ethnic data

Race and ethnicity data should be collected while accommodating any concerns of 257 communities who are participating. Many communities have historically been harmed or 258 severely mistreated by health researchers.[43] As a result, these communities may mistrust 259 health researchers or public health practitioners and require accommodations for the 260 management and storage of their data. In 2019, the National Institutes of Health (NIH) held a 261 national tribal consultation on the NIH draft Data Management and Sharing Policy.[44] One 262 important theme that emerged was the responsibility of NIH to train researchers it supports in 263 the appropriate management and sharing of American Indian/Alaska Native health data.[44] 264 This strategy involves strengthening transparency and accountability by making data 265 management and sharing plans publicly available and accessible.[44] Using data in a 266 responsible manner is critical given that the cause of racial disparities in health is structural 267 racism and not an individual's actual race and/or ethnicity. 268

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In a 2021 equity report released by Blue Cross Blue Shield, it was recommended that all staff who 270 collect data on race and ethnicity be trained on how to ask people for their personal information.[45] 271 Training for staff who collect this information will need to be tailored to organizational policies and 272 goals around race and ethnicity data collection but should center cultural humility, respect, and 273 accuracy in the approach.[45] Centering cultural humility, the practice of improving rapport through 274 respect and curiosity, can establish trust and improve the accuracy of data collection.[45] Although 275 maintaining ongoing training involves additional organizational resources, improving the accuracy of 276 public health data sets yields a greater return as institutions will be able to better scale their projects for 277 maximum impact in reducing racial disparities in health. 278

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Prioritize additional research inquiries into best practices for collecting racial and ethnic data on
 foreign-born, child and adolescent, and disenfranchised populations: The strategies outlined up to this



point are broad and intended to be applicable across a range of public health settings. However, there 282 are special considerations for populations with circumstances that may affect data collection. 283 284 According to the Bureau of Labor Statistics, foreign-born workers accounted for 18.6% of the U.S. civilian labor force in 2023.[46] These workers are more likely than native-born workers to be 285 employed in service occupations and less likely to have completed high school; also, they earn lower 286 wages.[46] Given the growing number of foreign-born U.S. residents, additional research on how best 287 288 to capture racial and ethnic data on this population is needed beyond the existing OMB categories. Currently, we know broadly that nearly one half of the foreign-born workforce is Latine and that one 289 290 quarter is Asian; however, more granularity would greatly improve public health's ability to respond to and promote health in this population.[46] When collecting these data for public health programming, 291 292 inquiring about country of origin in combination with open-ended questions can enhance the accuracy of data on this population. 293

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Another area in need of additional research is collection of racial and ethnic data within 295 296 populations of children and adolescents. Currently, standard practice for collecting these data in public health settings largely involves caregivers providing this information on behalf of their 297 298 children. However, how caregivers view the racial and ethnic identity of children may be misaligned with how the child or adolescent identifies. The growing number of transracial 299 adoptees and multiracial/multiethnic individuals in the United States, particularly among 300 younger generations, supports the need for additional research into best practices for collecting 301 racial and ethnic data among these populations.[47] 302

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Lastly, there are additional groups of people who may be disenfranchised due to various social and economic inequities associated with their group membership. This includes but is not exclusive to people who are experiencing homelessness or are receiving inpatient services for various conditions. Self-identification should still be prioritized, but additional research to identify safeguards and approaches that cause the least amount of harm is needed.



Action Steps to Implement Evidence-Based Strategies

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	Evidence-Based Strategy		Action Steps
1	Prioritize self-reported data and improve completion of racial/ethnic data sets.	1a	Health-determining systems and entities, including health departments, should require providers and public health more broadly to collect the data and include data completion reports and targets in quality assurance reviews.
		1b	Health-determining systems and entities, including health departments, should improve information system capacity to collect, manage, process, and transmit data at different levels, such as expanded categories and open-answer fields.
		1c	Federal, state, tribal, and local governments should improve public health agency resources and staffing.
2	Use participatory action research to adapt to and maintain dynamic definitions of race and ethnicity.	2a	Health-determining systems and entities, including health departments, should integrate community expertise through multiple modalities to improve inclusive design, collection, analysis, and reporting of racial/ethnic data.
		2b	Through community leadership models, health- determining systems and entities, including health departments, should establish relationships to ensure continuous and ongoing improvement in efforts as social constructs and community dynamics evolve over time.



3	Train public health researchers and practitioners to responsibly and respectfully collect racial and ethnic data.	3a	Academic institutions, funding agencies, health care systems, local health departments, nongovernmental organizations, professional associations, state health departments, the U.S. Department of Health and Human Services, and other health-determining entities should require the implementation of cultural sensitivity and humility training, create scripts, and provide ongoing education for all race and ethnicity data collectors.
		3b	Health-determining systems and entities should make organizational data management and sharing plans publicly available to increase trust of and support for data collectors.
4	Prioritize additional research inquiries into best practices for collecting racial and ethnic data on immigrant, child and adolescent, and disenfranchised populations.	4a	Model organizational policies for how to collect racial and ethnic data on immigrant, child and adolescent, and disenfranchised populations should be established and/or reviewed as the evidence base is being built.
		4b	Health-determining systems and entities should prioritize self-reported data in immigrant, child and adolescent, and disenfranchised populations over existing administrative data to improve accuracy and support respondents' agency to self-identify.

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Opposing Arguments/Evidence

311 This policy statement has highlighted the benefits of collecting disaggregated racial and ethnic

- data. However, there are several concerns and issues that have to be considered.
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314 Unintended consequences of data collection methods

Certain data collection methods should be changed to improve public health through better interventions, policies, and programs; however, some of these methods could have unintended harms, including further contributing to systemic racism and its impacts. As practitioners implement recommendations, care should be taken to consider how data are shared and how they could intentionally or unintentionally cause harm to different populations.[48]

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321 **Patient privacy and confidentiality challenges**

322 When discussing privacy and confidentiality concerns, patients and consumers may view collecting information about an individual's race and ethnicity as intrusive and a potential 323 324 invasion of privacy for various reasons. In addition, disaggregation of race and ethnicity data can increase the risk of "reidentification" for some groups when this information is made publicly 325 326 available.[49] Reidentification refers to the ability to use data from a deidentified data set to identify individuals, and it is one of the biggest risks associated with disseminating disaggregated 327 328 data on race and ethnicity. The risk of reidentification varies from one state or locality to another due to demographic differences because race and ethnicity can be "quasi-identifiers." [49] A 329 strategy to combat this challenge is to selectively suppress race and ethnicity data in areas where 330 there are too few individuals and privacy concerns are present.[49] As such, suppression 331 guidelines and criteria should be a part of state, local, and/or institutional racial and ethnic data 332 333 collection plans. Some states already have more broad privacy protections relating to public dissemination of data; California, Nebraska, New York, Tennessee, and Texas all have laws in 334 place to protect privacy and/or explicitly reduce the risk of reidentification.[50] While 335



reidentification is a valid risk that public health data collectors should be mindful of, the risk
does not outweigh the benefit or utility of more detailed race and ethnicity data. There are
resources such as the Network for Public Health Law's Disaggregation of Public Health Data by
Race and Ethnicity: A Legal Handbook, which was created specifically to address the role of law
in collecting and disseminating these important data to reduce racial disparities in health.[50]

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342 Lack of resources and increased burden on data collectors

343 While additional training for data collectors, revised instruments, and more time on the front end do require resources, the potential fiscal and health returns from improved public health data sets 344 outweigh the investment. According to an analysis by Deloitte of several high-cost chronic 345 diseases (diabetes, asthma, and cardiovascular disease), health disparities account for \$320 346 billion in annual health care spending.[51] If health disparities continue to go unmitigated, this 347 figure is anticipated to grow to \$1 trillion or more by 2040.[51] This projected increase in health 348 care spending could cost the average U.S. resident at least \$3,000 annually, which is triple the 349 current cost.[51] Hence, while there is an ethical case to mitigate racial disparities in health, there 350 are economic and social justifications as well. 351

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To do our part to support the mitigation of racial disparities in health, it is time for public health

- to lead at the local, state, and institutional levels by providing more robust and complete data
- 355 sets. With robust, accurate, and complete data, we can better allocate resources to support
- populations on the journey to dismantling long-standing barriers to health, equity, and justice.



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