

## **UHSRC Guidance: Asking Questions About Race and Ethnicity**

The University Human Subjects Review Committee (UHSRC) requires consistency, clarity, and precision when asking questions about race and ethnicity on surveys and other study materials. This requirement is consistent with the Belmont Report principles of Respect for Persons, Beneficence, and Justice, which are the pillars of human subject protection regulation. This guidance explains the rationale behind this requirement, how to comply, and examples of acceptable questions.

Race and ethnicity, in this context, refers to considering all possible options regarding a person's origins. The UHSRC wants to be clear in stating that categorizing race and ethnicity for demographic purposes is an attempt to understand sociopolitical structures, and does not define race as a genetic or biological construct.

### **Rationale**

The UHSRC recognizes the racial and ethnic diversity of the United States, and the increasing number of people who identify in more than one ethnic category. The UHSRC also acknowledges the value of collecting such data in research studies. The goal of the UHSRC is to provide guidance for the accurate and respectful collection of race and ethnicity information from human subjects participants

### **Compliance**

The U.S. Office of Management and Budget (OMB) has recently revised its guidelines for gathering and presenting race and ethnicity data. Their guidance was informed by surveying and interviewing representatives from various racial and ethnic organizations, along with obtaining public commentary. Eastern Michigan University's UHSRC guidelines have been informed by OMB's findings.

Historically, race and ethnicity have been presented as separate items on questionnaires and in research studies. However, OMB recommends that race and ethnicity be presented as a single question. This recommendation is due in part to public commentary stating that the two-question structure was confusing--especially to those who identify as Hispanic and/or Latino. Eastern Michigan University's UHSRC will also recommend a one-question race/ethnicity question structure.

The OMB also recommends that survey participants be able to select multiple categories to ensure that all identities are taken into account. The OMB also recommends the addition of "Middle Eastern or North African" (MENA) to all surveys that ask for racial and ethnic identity. Eastern Michigan University adopts these recommendations.

Additionally, the UHSRC requires that investigators consider the following before collecting data about participant race/ethnicity:

1. **Necessity of the question:** Investigators must ask themselves how the information will be used: if the information is used for tabulation purposes only or for ensuring diversity of a sample, or if the information is germane to data analysis. If the information is not needed for analysis purposes, there may be better ways to ensure sample diversity than asking personal or potentially invasive questions.
2. **Not requiring a response for participation:** Human subject regulation stipulates voluntary participation. This voluntariness extends to individual survey or interview or demographic items. Investigators must allow individuals not to respond to questions about race/ethnicity (or other sensitive or personal characteristics), or provide an option indicating that the subject chooses not to reply.
3. **Privacy and confidentiality concerns:** Race/ethnicity are personal characteristics, which are not always externally apparent. As such, it is especially important to protect this information, especially when recorded as identifiable. Investigators must ensure that research subjects provide this information in a location where they are comfortable and that ensures their privacy. In addition, all data must be securely stored, whether in a password-protected computer file on a password-protected cloud server or in a locked cabinet in a locked office. Note that double protection (two passwords or separate locks) is required as a protection of confidentiality. Whenever possible, the UHSRC strongly recommends maintaining anonymous or de-identified data as further protection.
4. **Appropriate language:** Certain terms that refer to one's race/ethnicity are considered outdated, offensive, and should not be used in obtaining race/ethnicity data at Eastern Michigan University. For a complete list of antiquated terms, please see [OMB's Statistical Policy Directive No. 15](#).

The UHSRC will require both **precision and inclusivity** in language in consent documents, survey questions, interview questions, and other application documents. Applications that are not compliant will be returned for revision unless there is a documented and scientific/methodological reason why inclusivity impedes the research project.

### **Acceptable Questions and Response Options**

Below are examples of appropriate race/ethnicity questions that have been created by the U.S. Office of Management and Budget in their [Statistical Policy Directive no. 15](#). These can be modified to fit specific survey needs and will be reviewed by EMU's UHSRC in all human subjects research applications.

**Figure 1. Race and Ethnicity Question with Minimum Categories, Multiple Detailed Checkboxes, and Write-In Response Areas with Example Groups**

**What is your race and/or ethnicity?**  
*Select all that apply and enter additional details in the spaces below.*

**American Indian or Alaska Native** – *Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.*

**Asian** – *Provide details below.*

Chinese                       Asian Indian                       Filipino  
 Vietnamese                       Korean                       Japanese

*Enter, for example, Pakistani, Hmong, Afghan, etc.*

**Black or African American** – *Provide details below.*

African American                       Jamaican                       Haitian  
 Nigerian                       Ethiopian                       Somali

*Enter, for example, Trinidadian and Tobagonian, Ghanaian, Congolese, etc.*

**Hispanic or Latino** – *Provide details below.*

Mexican                       Puerto Rican                       Salvadoran  
 Cuban                       Dominican                       Guatemalan

*Enter, for example, Colombian, Honduran, Spaniard, etc.*

**Middle Eastern or North African** – *Provide details below.*

Lebanese                       Iranian                       Egyptian  
 Syrian                       Iraqi                       Israeli

*Enter, for example, Moroccan, Yemeni, Kurdish, etc.*

**Native Hawaiian or Pacific Islander** – *Provide details below.*

Native Hawaiian                       Samoan                       Chamorro  
 Tongan                       Fijian                       Marshallese

*Enter, for example, Chuukese, Palauan, Tahitian, etc.*

**White** – *Provide details below.*

English                       German                       Irish  
 Italian                       Polish                       Scottish

*Enter, for example, French, Swedish, Norwegian, etc.*

**Figure 2. Race and Ethnicity Question with Minimum Categories Only and Examples**

**What is your race and/or ethnicity?**

*Select all that apply.*

**American Indian or Alaska Native**

*For example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.*

**Asian**

*For example, Chinese, Asian Indian, Filipino, Vietnamese, Korean, Japanese, etc.*

**Black or African American**

*For example, African American, Jamaican, Haitian, Nigerian, Ethiopian, Somali, etc.*

**Hispanic or Latino**

*For example, Mexican, Puerto Rican, Salvadoran, Cuban, Dominican, Guatemalan, etc.*

**Middle Eastern or North African**

*For example, Lebanese, Iranian, Egyptian, Syrian, Iraqi, Israeli, etc.*

**Native Hawaiian or Pacific Islander**

*For example, Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, etc.*

**White**

*For example, English, German, Irish, Italian, Polish, Scottish, etc.*

**Figure 3. Race and Ethnicity Question with Minimum Categories Only**

**What is your race and/or ethnicity?**

Select all that apply.

- American Indian or Alaska Native**
- Asian**
- Black or African American**
- Hispanic or Latino**
- Middle Eastern or North African**
- Native Hawaiian or Pacific Islander**
- White**