

WISEWOMAN Justification for 2024 OMB Statistical Policy Update-15

The WISEWOMAN Program has selected *Figure 2. Race and Ethnicity Question with Minimum Categories Only and Examples* for compliance with 2024 OMB Statistical Policy Update 15. This choice to use was made in light of two factors:

1. Reduces Burden on Agency or Respondents

The use of *Figure 2. Race and Ethnicity Question with Minimum Categories Only* does not add additional burden for government agency and up to 40 respondents.

This is because respondents currently see 7 response options for Race¹. This is shown in **Attachment 9** of SSA. The way *Figure 2. Race and Ethnicity Question with Minimum Categories Only* is configured it also has 7 possible choices to select from. Therefore, *Figure 2. Race and Ethnicity Question with Minimum Categories Only* can be easily adopted by up to 40 respondents without having to completely reconfigure their data input screens that will only require minimal time, effort, and financial resources on their part which is in the middle of an ongoing cooperative agreement. This also reduces burden for the government agency as minimal time, effort, and financial resources would be needed to update the current data manual 23.1 to 23.2 (see attachment 9) and with minimal updates to the validation tool.

In summary, selecting *Figure 2. Race and Ethnicity Question with Minimum Categories Only* reduces burden for up to 40 respondents and the government agency.

Conversely, if *Figure 1. Race and Ethnicity Question with Minimum Categories, Multiple Detailed Checkboxes, and Write-In Response Areas with Example Groups* was used it would have required 40 respondents to modify their data systems for data collection and alter the structure of their exported data file by expanding the current data file length by adding write-in character fields, one for each of the 7 options for combined race and ethnicity fields. Changing the data file length would change data file structure and would burden the up to 40 respondents by requiring significant time, effort, and financial resources.

Selecting *Figure 1. Race and Ethnicity Question with Minimum Categories, Multiple Detailed Checkboxes, and Write-In Response Areas with Example Groups* could also interrupt the flow of the information collection as all respondents would not be able to make the changes to their data systems for data collection and alter the structure of their exported data file and in time for the WISEWOMAN data submission. This would result in partial data submission which would not be advantageous to the government.

Figure 1. Race and Ethnicity Question with Minimum Categories, Multiple Detailed Checkboxes, and Write-In Response Areas Figure 1 would also burden the government agency by requiring time, effort, and financial resources to significantly reconfigure the data validation tool for respondent data files. Therefore, it would also **not be** advantageous to the government agency and also the respondents to interrupt data validation tool during implementation of an ongoing cooperative agreement.

2. Risk to respondents' privacy or confidentiality

Selecting *Figure 1. Race and Ethnicity Question with Minimum Categories, Multiple Detailed Checkboxes, and Write-In Response Areas* would result in specific data on specified Origins and combined with age and Zip Code could compromise confidentiality and also impact privacy of WISEWOMAN participants living in some sparsely populated residential zip codes. Therefore, Participants living in these areas belonging to minority race and ethnicity Origins would become relatively easy to identify in some cases. This can happen due to WISEWOMAN participants combined race and ethnicity with check boxes for specific Origins despite the deidentified data being sent to the government agency.

However, the use of *Figure 2. Race and Ethnicity Question with Minimum Categories Only* the collected data is general with overarching combined race and ethnicity categories with Origin's being used as prompts. Linking with age and Zip Code would maintain a WISEWOMAN participants confidentiality and also safeguard their privacy concerns in even sparsely populated zip codes.

Conclusion

In conclusion, the WISEWOMAN Program has selected *Figure 2. Race and Ethnicity Question with Minimum Categories Only and Examples* for compliance with 2024 OMB Statistical Policy Update 15 and seeks OMB approval.