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Native Hawaiian and Pacific Islander (NHPI) Data Policy Lab
UCLA Center for Health Policy Research

Native Hawaiian and Pacific Islander Data Policy Platform

No Health Equity without Data Equity

Creating the model for data-driven policymaking for Native Hawaiian and Pacific Islander populations in the time of the pandemic to help promote health equity.

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In humility and respect, we lay our sacred acknowledgments and gratitude at the feet of all that is Indigenous, and therefore sacred, to these lands. To your mountains and valleys, oceans and deserts, and all that hold life as the original stewards of these sacred grounds. We seek your blessing and permission as settlers on your lands to carry forth this work with a commitment to elevating Indigenous interests and causes in all ways. As immigrants from the far ocean, we have a duty to your past, current, and future generations and are committed to learning, working, and supporting all that you wish for yourselves.

Western maps highlight how the Pacific Islands are spread across vast distances from each other, separated by hundreds if not thousands of miles. Our islands become small specks next to vast continental landmasses. What the maps fail to capture are the bonds of shared cultural values that remain firm and steadfast. The Native Hawaiian and Pacific Islander (NHPI) Data Policy Platform represents an effort to continue the work of our elders and ancestors who advocated tirelessly for data equity. NHPIs have been united in their call for disaggregated data for decades, and we hope this document continues to strengthen the bond rooted in shared cultural values that have carried us for generations.

These shared cultural values operate in tandem with the hallmarks of language and traditions of the richly diverse set of communities that the NHPI label encompasses. NHPIs can hold their specific community identity close while almost universally agreeing with values that prioritize service to God and family before themselves as individuals. Cultural values such as honoring ancestors, viewing the world through a holistic lens, and practicing good stewardship for future generations are also found throughout Pacific Island communities.

These same values helped shape the NHPI Data Policy Platform. Many of the recommendations within this Platform overlap considerably with those made by other bodies interested in protecting vulnerable communities from discrimination and abuse. However, this document uses NHPI cultural values to evaluate potential threats when data systems overlook, misrepresent, or otherwise use our community's data without meaningful community input. Our cultural values also provide a framework that guides recommendations that address those issues.

Pacific Islander communities will continue to map their own course and adapt accordingly to a fast-changing world. We similarly intend for this Platform to be a flexible resource that can change to reflect the community's needs over time. Although data and its uses will continue to evolve in new and unexpected ways that will surprise us and take the world in new directions, we believe that our values will ensure that even in unfamiliar territory we will never be lost.

This work reflects the authors' best effort to convey the community's voice as expressed throughout the development process. We humbly ask for grace for any shortcomings.

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Introduction

When Martin Luther King Jr. and his fellow civil rights protestors marched from Selma, Alabama, to Montgomery for the third time, they did so adorned with leis gifted by a fellow reverend and chair of Hawai'i's Advisory Committee of the U.S. Civil Rights Commission, Rev. Abraham Akaka. The leis symbolized their shared principles and steadfast commitment to racial equity, for which any distance across ocean or land was trivial.

The legislation that arose as a result of the civil rights movement recognized that discriminatory practices were deeply embedded in institutional systems and required data that could determine whether communities that had been historically discriminated against were being given equal access. The data standards used to monitor and enforce compliance with civil rights laws were eventually codified in Office of Management and Budget Directive No. 15 (OMB 15), which was revised in 1997 to mandate a separate category for Native Hawaiians and Pacific Islanders (NHPIs).

Despite the federal mandate's 25th anniversary this year, numerous state-level mandates, and the historical advocacy of NHPI community leaders, NHPIs are still vastly underrepresented in data. Lack of health and socioeconomic data has rendered NHPI inequities invisible.[i] Consequently, NHPI populations are overlooked in policy and decision-making. To address the issues around data, the NHPI Data Policy Platform provides policy recommendations to improve NHPI data quality, identify data gaps, and develop data systems processes that provide meaningful opportunities for community participation and engagement.

The Platform is a collaborative effort between more than 135 NHPI leaders across 12 states and the District of Columbia and the NHPI Data Policy Lab at the UCLA Center for Health Policy Research. The Lab was founded by public health, policy, and social justice leaders of NHPI heritage under the leadership of Dr. Ninez Ponce, the Director of the Center for Health Policy Research and with the support of Dr. Brittany Morey, Assistant Professor at UC Irvine. The Lab formed at the onset of the COVID-19 pandemic in response to an urgent need to centralize and democratize NHPI COVID-19 statistics. In doing so, NHPIs became increasingly recognized as a high-risk population. The Lab continues to support the work of NHPI community-based organizations and their efforts to advocate for equitable data policies.

This Data Policy Platform proposes a framework to be used by change agents, policymakers, community activists, and data-driven institutions to address NHPI communities' data needs. The Platform serves to augment current data practices with community expertise and to grow our communities' capacity to determine how our data are used. The framework draws on the journey often taken by data, from questionnaire design and collection methods to partnering with communities to announce findings and provide them in community-accessible formats.

From start to finish, ample opportunities exist for data systems actors to work closely in partnership with NHPI communities to improve their internal systems. More importantly, this community-informed framework establishes lasting relationships that will help guide work through a rapidly changing digital landscape. The ability to adapt and rely on strong relationships in order to weather challenging environments was a familiar skill for our NHPI ancestors. It is our hope that we can share their lessons and spirit together with policymakers who wish to join this movement as we move forward.

Acknowledgments

We would like to thank Robert Wood Johnson Foundation for the opportunity to elevate the voices of Native Hawaiian and Pacific Islander (NHPI) communities in advocating for data equity through this NHPI Data Policy Platform.

We would like to thank the UCLA Center for Health Policy Research for providing a home for the NHPI Data Policy Lab and for the support and resources that allow us to conduct this work. Thank you to Dr. Ninez Ponce and all the members of the NHPI Data Policy Lab. Thank you to Empowering Pacific Islander Communities (EPIC) for the supplemental funds that supported community participation. Thank you to Southern California Pacific Islander Community Response Team (SoCal PICRT) for the supplemental funds to support the design and layout of this report.

Our ancestors who advocated for data equity and our elders who continue to do so inspired the NHPI Data Policy Platform. Their work to ensure NHPIs are visible and accurately represented stretches back decades and continues to make the NHPI Data Policy Lab's work possible. Those efforts include Senator Akaka's "Stand up and Sound off" testimony, Papa Ola Lōkahi's Threads in the Human Tapestry report, and the community-led Policy Platform Blueprint for NHPIs in the United States, among other countless others.

We are extremely grateful to the community leaders, advocates, and organizations who provided input and feedback through the focus groups and interviews upon which this content was developed. Your contributions represent the experiences of communities in Alaska, Arizona, Arkansas, California, Hawai'i, Michigan, Minnesota, Nevada, New York, Oregon, Texas, Utah, Washington, and Washington, D.C. You raised the priority issue areas affecting NHPI communities and recommended that focus is given to sub-populations needing more specific considerations and attention. Thank you for your caring contributions.

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Executive Summary

The Native Hawaiian and Pacific Islander (NHPI) Data Policy Platform is a resource for change agents, policymakers, community activists, and data-driven institutions seeking to improve their data processes to better address NHPI needs and develop more fruitful relationships with NHPI communities. This Platform details the harm created by data systems that inadequately reflect NHPI communities' challenges and strengths while proposing a framework and specific recommendations for improving data systems for NHPIs. This Platform reflects input and feedback provided by over 135 NHPI community leaders across multiple states.

Recommendations

NHPI data needs are present throughout the data life cycle, which the Platform divides into four pillars: 1. Data Collection, 2. Data Analysis, 3. Data Use, and 4. Data Access. Disaggregated NHPI data historically either have failed to have been collected, have had insufficient NHPI data collected to allow for meaningful analysis, or have been inaccessible to NHPI communities. This Platform recommends a data equity framework centered on addressing these issues through meaningful inclusion of NHPI communities throughout the development and implementation of data processes and using partnerships to build the NHPI community's self-sufficiency and capacity to work with data.

NHPI leaders expressed the need to develop processes that encourage and incentivize building community capacity and applying community-centered principles across all four pillars. Prominent recommendations for these two cross-cutting recommendation categories include lasting, sustainable investment in NHPI communities to strengthen data literacy, analytical expertise, and community-friendly data reporting.

Priority Areas of Need

NHPI community leaders identified numerous high-priority issue areas negatively impacted by a lack of quality NHPI data. These priority areas include 1. Civic Engagement, 2. Criminal Justice Reform, 3. Climate Justice, 4. Community Capacity, 5. Economic Justice and Housing, 6. Education, 7. Health, 8. Immigration, and 9. Women's Rights. NHPI community organizations addressing these issues are frequently hampered by the lack of NHPI data, placing them at a disadvantage when advocating for resources from data-driven funders, agencies, and decision-makers. Improving data systems and

Summary of Data Policy Recommendations

PILLAR 1 - DATA COLLECTION

I. Include NHPI subgroup options (Native Hawaiian, Fijian, Marshallese, etc.) when collecting racial and ethnic data.
II. Use data categories that accurately reflect NHPI communities.
III. Standardize data categories across all entities that contribute data used for policymaking.
IV. Improve data collection tools.
V. Research and document barriers to data equity.
VI. Improve data collection methods for NHPIs.
VII. Collect and store the minimally necessary amount of data required.

PILLAR 2 - DATA ANALYSIS

I. Apply community-centered principles to NHPI data analysis.
II. Prioritize data analysis that meets urgent NHPI community needs.
III. Use enhanced measures in algorithmic analysis and evaluations to protect against discriminatory outcomes.

PILLAR 3 - DATA USE

I. Develop and implement a data stewardship framework that applies throughout the data life cycle in partnership with NHPI communities.
II. Support legal frameworks that provide broad protection against abusive data use practices that harm or exploit communities.
III. Institutionalize community oversight bodies

PILLAR 4 - DATA ACCESS

I. Data systems should be developed with dissemination to relevant communities in mind.
II. Develop flexible standards for balancing detailed data needs and privacy concerns.
III. Establish a centralized NHPI data repository.

data accessibility would allow NHPI organizations to improve their ability to advocate for systems change, resources, and culturally and linguistically relevant programs. Improved data would also help identify systemic barriers in each of these areas and evaluate the impact of interventions for NHPI communities.

Specific Population Considerations

Several NHPI communities who necessitate special considerations with regard to data needs were identified by NHPI community leaders. These include Compact of Free Association (COFA) communities; Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, Asexual (LGBTQIA+); and Native Hawaiians. Those considerations mean that their data needs are particularly pronounced.

COFA communities comprise those from the Republic of the Marshall Islands (RMI), Federated States of Micronesia (FSM), and Republic of Palau. Following World War II, compacts granting allowance for U.S. military bases to operate on these islands were established. These compacts guarantee U.S. securities and economic assistance and provide unique immigration and employment benefits for these freely associated states (FAS).[ii]

Populations on the islands are particularly vulnerable due to the devastating impact of nuclear weapons testing on and around the home islands. COFA communities, both on island and in the diaspora, also tend to have high rates of disparities across health and socio-economic conditions as a result of nuclear testing and displacement. The relatively small size of COFA communities increases the difficulty of collecting accurate data. Greater investments in data are needed in order to grasp the scale of the challenges they face and allow for more effective advocacy efforts and direction of resources.

Data for NHPI LGBTQIA+ community are sparse and currently inadequate for capturing an accurate portrait of their challenges. Specific data for this community is necessary because Western gender constructs do not reflect NHPI cultural and traditional roles that non-binary and trans-identifying NHPI community members have had. These intersecting dimensions, including gender identity, sexual orientation, and race, create a burden of discrimination that should be fully captured so that adequate resources and programs can be devoted to addressing the community's issues. Those issues that data will help inform and strengthen advocacy efforts include HIV/

AIDS, discrimination, health services access, mental health resources, and safe spaces.

Native Hawaiians, or Kānaka Maoli, have uniquely important data needs due to the extensive harmful impact of colonization, the community's relationship with the federal government reflected in Native Hawaiian-specific federal legislation, and being indigenous to the U.S. by virtue of being indigenous to Hawaiʻi. Native Hawaiian leaders have proposed data systems recommendations that would more closely reflect Native Hawaiian values and emphasize the relationship of the community's well-being across all issue areas to the environment and land-use.

Action Steps

Specific recommendations are provided for government agencies, policymakers, and data-driven institutions to help guide implementation of the proposed framework and broader recommendations. Common themes across these recommendations include establishing values-driven relationships and community partnerships, increasing investment in NHPI communities' capacity to work with data, and implementing data standardization and linkage protocols to maximize the value of data.

Introduction to Data Policy Recommendations

Over the course of the COVID-19 pandemic, frighteningly large viral surges were simultaneously overwhelming hospitals and the public health data infrastructure. The patchwork of health data systems across the country was unable to provide accurate and consistent data on a timely basis, hobbling the ability of government agencies and community organizations to develop and implement effective policies or allocate resources where communities needed them most.[iii,iv,v] This has resulted in numerous discussions and initiatives around the need to modernize public health data infrastructure to prevent these issues from happening again.[vi,vii,viii] The importance of doing so has not been lost on Native Hawaiian and Pacific Islander (NHPI) communities. Unfortunately for NHPIs, the data issues faced by hospitals, government agencies, and community organizations predate the pandemic by decades and exist in other issue areas that impact health outcomes in NHPI communities. As a result, NHPI communities faced potentially fatal delays obtaining much-needed resources.

The shared challenges faced by NHPIs and entities tasked with addressing the pandemic run the entire length of the data life cycle.[ix] These shortcomings apply to all issues facing NHPIs, not just health. Data gaps resulting from substandard or outdated data collection practices prevent NHPIs from seeing a complete and accurate portrait of challenges we face, leaving our community-serving organizations at a disadvantage when advocating for resources. Problematic analysis that would have benefited from community and subject matter expertise may have delayed developing culturally relevant and linguistically competent interventions.[x]

Communities have also been skeptical and reluctant to participate in data-gathering projects due to a history of organizations exploiting NHPI data. Often, this takes the form of "helicopter research," in which institutions with power and resources collect data on NHPI communities, publish their reports, and benefit professionally and monetarily, but then make no investments or efforts to improve the lives of NHPI community members. This has reduced institutional trust even for well-meaning organizations. NHPI community-serving organizations also often face difficulties accessing or obtaining data in a comprehensible format. This further dilutes the utility of NHPI data.

We share these data policy recommendations along the data life cycle to address longstanding needs for data equity for NHPIs. However, we acknowledge that attention is also required for entities who have not yet entered the data life cycle with NHPI data. An audit and evaluation that examines current NHPI data collection practices and collaborative community efforts would provide a foundation for setting data policy goals. These assessments would determine what data are being collected and the quality of that data while informing plans to improve those processes.

Data collection, **analysis**, **use**, and **access** represent pillars along the data life cycle that will be the focus of the following sections. The recommendations set forth in each pillar reflect Guiding Principles that create a standard of behaviors and common values that build strong and vibrant relationships with and among NHPI communities. For NHPIs, relationships are a necessary precursor for understanding our communities and responding to their needs effectively.

Guiding Principles:

1. Recognize historical discrimination and its continuing impact on data systems.
2. Respond to needs of communities with highest disparities.
3. Establish community partnerships to guide priorities and approaches.
4. Ensure accurate and sufficient representation of racial and ethnic groups and subgroups throughout all data systems processes.
5. Respect for and responsiveness to cultural and linguistic diversity and inclusion.
6. Engage community in defining access to and ownership of data.

Two recommendation categories—Build Community Capacity and Utilize Community-Centered Principles—were synthesized based on common themes identified in input provided by community leader participants. Each of those categories are applied across the data recommendation pillars that follow in the next section.

1. Build Community Capacity: Community capacity in the context of this Platform refers to self-reliance and the ability to serve the community's needs. This includes developing data skillsets, establishing sound organizational infrastructures, and building sustainable leadership pipelines. Enhancing community capacity will result in more productive relationships with data systems representatives and strengthen the NHPI community's ability to address priority issue areas.

2. Utilize Community-Centered Principles: Community-centered principles prioritize relationships and needs of the community the data are intended to benefit. Community-centered principles are aligned with Community Based Participatory Research (CBPR), which is defined as "a collaborative approach to research that equitably involves all partners in the research process and recognizes the unique strengths that each brings. CBPR begins with a research topic of importance to the community and has the aim of combining knowledge with action and achieving social change."[xi] Numerous NHPI leaders are experienced with CBPR implementation through cancer research projects such as WINCART[xii] and PATH.[xiii]

Pillar 1: Data Collection

CHALLENGE: The design and implementation of data collection systems and tools frequently neglect to include NHPI community expertise. As a result, NHPI data are not collected or inaccurately collected, or insufficient NHPI data are collected—all preventing meaningful analysis. This occurs when:

- A disaggregated NHPI category is missing, typically due to being hidden within the inaccurate "Asian Pacific Islander" label or a catch-all category such as "Other."
- Single-race categories are used instead of multiracial categories. The NHPI population can nearly double when multiracial categories are used, depending on the geographic level.
- The NHPI community is not included in sample frames. Sample frames are lists or specific descriptions of groups that attempt to capture everyone a survey is supposed to target. Surveys are usually sent only to a smaller group of people within those sample frames. If NHPIs are not in the sample frame, or comprise a very small part of the sample frame, it is possible that not enough NHPIs will be randomly selected from the sample frame to provide reliable data, or any data at all.
- The NHPI sample size is insufficient and does not support stable estimates or remains under reporting thresholds.

Failure to consult with NHPI communities has also resulted in data systems capturing narrowly defined measures that prioritize funder-driven metrics instead of holistic measures that more accurately capture the NHPI community's needs, strengths, and unique characteristics. For example, many health metrics commonly describe individual characteristics and behavior, such as the number of visits to a doctor or whether an individual was diagnosed with a chronic disease. However, NHPI communities display resilience through mutually supportive social structures and preservation of traditional land practices that conventional metrics rarely capture yet support healthier individual, family, and community outcomes.

Recommendations

1. **Include NHPI subgroup options (Native Hawaiian, Fijian, Marshallese, etc.) when collecting racial and ethnic data.**

Context: The NHPI category mandated by Office of Management and Budget Directive No. 15 represents a bare minimum requirement for federal agencies in terms of offering a disaggregated racial category for NHPIs. The reality is that the NHPI category misses significant and crucial disparities between NHPI subgroups. Groups such

Build Community Capacity

Provide support for the NHPI community to strengthen data literacy, design data systems, and develop case studies for designing inclusive data collection systems. NHPI partners can combine this knowledge with the community's cultural and linguistic expertise to improve data collection efforts and design their own.

Utilize Community-Centered Principles

Data systems representatives should develop relationships with NHPI partners as early as possible and jointly set goals, a partnership structure, and resource sharing mechanisms.

as Native Hawaiians and Compact of Free Association communities also have distinct federal- and state-level funding streams.

A. Utilize NHPI subgroup categories - Include disaggregated NHPI subgroups in data collection systems. At minimum, use the proposed detailed categories put forth by the Federal Interagency Technical Working Group on Race and Ethnicity Standards for revising OMB's 1997 Statistical Policy Directive No. 15.[xiv] These detailed categories include Native Hawaiian, CHamorro, Samoan, Tongan, Fijian, and Marshallese. When possible, especially for online data collection tools and data collection from U.S. Territories and FAS, expand subgroup categories to include the 20 groups listed in the table below. These groups are among a full list of NHPI subgroups provided on the 2020 Census National Redistricting Data Summary File.[xv] This will allow for more detailed reporting that will inform more effective programs that account for cultural and linguistic needs as well as more accurate program evaluation.

Expanded NHPI Subgroup Categories

(Listed in order of population size based on Census 2010.)

1. Native Hawaiian
2. Samoan
3. CHamorro
4. Tongan
5. Fijian
6. Marshallese
7. Palauan
8. Tahitian
9. Chuukese
10. Pohnpeian
11. Saipanese
12. Yapese
13. Tokelauan
14. Kosraean
15. Carolinian
16. Papua New Guinean
17. I-Kiribati
18. Mariana Islander
19. Solomon Islander
20. Ni-Vanuatu

B. Incentivize disaggregated data and data equity practices - Research grants can incentivize improvements in data disaggregation practices by increasing availability of resources dedicated for granular data collection and implementing revenue-neutral grant application scoring policies. Increased funding for collecting granular NHPI subgroup data would incentivize researchers and institutions to incorporate disaggregated NHPI data categories in their research. Revenue-neutral application scoring policies, such as amending grant scoring criteria to award higher scores for committing to collecting and disaggregating sufficient NHPI racial and ethnic subgroup data to report stable estimates, would also incentivize more equitable data collection practices.

II. Utilize data categories that accurately reflect NHPIs communities.

Context: Most data collection systems utilize single-race definitions for racial categories. However, a majority of NHPIs, particularly Native Hawaiians, identify as multiracial. This results in population counts and estimates that undercount NHPIs and consequently impact measurements that rely on population figures. The following data dimensions and variables should be used:

A. Multiracial definitions for NHPI racial categories – NHPIs have the largest share of multiracial individuals of any major racial group in the U.S. As a result, when only single-race individuals are counted as NHPI, the population of NHPIs is cut by more than half, according to the 2020 Decennial Census. This has implications for equitable allocation of resources, since smaller populations often receive lower priority.

Roll Up NHPI Categories

Melanesian	Micronesian	Polynesian
Fijian	CHamorro	Native Hawaiian
Papua New Guinean	Marshallese	Samoan
Solomon Islander	Palauan	Tongan
Ni-Vanuatu	Chuukese	Tahitian
	Pohnpeian	Tokelauan
	Saipanese	
	Yapese	
	Kosraean	
	Carolinian	
	I-Kiribati	
	Mariana Islander	

B. Geographic granularity below the county level - Programs and resources are often prioritized for communities geographically concentrated through placed-based funding models. However, NHPI communities, particularly on the continental U.S., are often geographically dispersed, despite maintaining strong networks and close familial and cultural ties. Ensuring that NHPI data are collected for geographic granularities at the neighborhood, census place, and census tract levels will allow data that otherwise would not be collected to be linked with data from other geographic areas.

C. Roll up NHPI categories - Design data collection instruments to enable aggregating NHPI subgroups into larger groups of Melanesian, Micronesian, and Polynesian when suppression thresholds and privacy concerns prevent reporting of more detailed NHPI subgroups. The recommended expanded subgroups, if collected, can be rolled up into the categories indicated in the table above.

D. Adjacent variables and combinations - NHPI family unit characteristics are not well represented by many default data categories in data collection tools and surveys.

For example, household income will be higher on average given larger NHPI household sizes, creating the impression that NHPI households are wealthier than they are. Variables that more accurately capture the state of NHPIs, such as per capita income, should be utilized.

E. Regularly review and update NHPI categories - A large number of relatively small NHPI subgroups often remain invisible in data collection methods, despite having their own unique language, culture, and traditions that should be considered by program design and evaluation. NHPI categories used in data collection should track and include rapidly growing NHPI communities, particularly those at risk of adverse climate events that may trigger climate migration. Some of the fast-growing NHPI subgroups are in the Micronesian category and are often left out in data collection. Policies should ideally automatically adjust to include newly relevant NHPI subgroups.

III. Standardize data collection categories, tools, and methods.

Context: The lack of standardized racial and ethnic data collection categories across federal, state, and local government agencies leads to significant data gaps and data reporting lags for NHPIs. For example, the lack of standardized data collection practices among states during the COVID-19 pandemic resulted in a severely flawed and lacking portrait of COVID-19's impact at the national level. Standardized practices allow for data sets to be linked, which can provide more statistically stable estimates and a more complete portrait of trends across geographies and communities. Resulting data sets can allow policymakers and community organizations to direct resources and develop programs effectively.

A. Utilize national standardized data collection categories - National standardized monitoring systems connected to state and local agencies and private actors should utilize standardized data collection categories that include an NHPI data category and NHPI subgroups. We recommend that agencies and actors use the proposed minimum and detailed categories put forth by the Federal Interagency Technical Working Group on Race and Ethnicity Standards for revising OMB's 1997 Statistical Policy Directive No. 15.[xvi] These detailed categories were proposed for the 2020 Census and include the option to select "Native Hawaiian or Pacific Islander" and further allow people to select one of the following detailed groups—Native Hawaiian, Samoan, CHamorro, Tongan, Fijian, Marshallese—with an option to write in details with the prompt: "Enter, for example, Palauan, Tahitian, Chuukese, etc."

IV. Improve data collection tools.

Context: Data collection tools such as surveys rarely incorporate NHPI languages or inadvertently reduce accurate responses by overlooking NHPI cultural considerations and values. Data collection tools should be designed in consultation with NHPI community cultural and linguistic experts to help ensure NHPI participation and sufficiently high response rates while minimizing measurement error.

A. Utilize community-vetted in-language translations - The NHPI community has skilled linguists experienced with translating technical and medical concepts for nonexpert NHPI audiences. Incorporating their expertise will increase meaningful NHPI participation in data collection efforts.

B. Ensure cultural appropriateness - Response rates to data collection efforts improve when community leaders and advocates are consulted in order to raise awareness of data collection efforts and promote participation. For example, NHPI community organizations were included in 2010 Decennial Census planning efforts and implementation of the NHPI National Health Interview Survey. Ensuring that culturally sensitive topics, such as those involving women's health issues, are translated appropriately can also improve response rates and reduce measurement error.

V. Research and document barriers to data equity.

Context: Data collection costs for hard-to-reach populations such as NHPIs and privacy concerns are frequently cited as barriers to collecting robust NHPI data.

A. Assess cost of data systems improvements - Fund research projects to document and assess current costs of incorporating the above recommendations.

B. Identify novel data collection methods - Fund collaborative research projects to identify novel data collection methods and techniques that will decrease data collection costs while maintaining compliance with data regulations and addressing privacy concerns.

VI. Improve data collection methods for NHPI communities.

Context: NHPI sample sizes are often too small to overcome data suppression thresholds or are withheld due to high margins of error. These issues can occur when insufficient NHPIs are included in sampling frame construction or when there is a low response rate from NHPIs. NHPI communities are often reluctant to provide personal data without understanding its use or because of unfamiliarity with the individuals tasked with data collection.

A. Oversample NHPIs – NHPI data are often lacking because so few NHPIs receive and respond to surveys and those who do respond may not be representative of NHPI communities. Oversampling is a method used to obtain higher quality data for smaller populations. This is accomplished by selecting a larger share of survey responses from the smaller population than they actually comprise in the overall population being studied. The larger share is then weighted so that the smaller population is treated as representative of their true share in the total population. However, the smaller population's data are more reliable because they can take into account more responses from that community.

B. Partner with NHPI organizations - NHPI organizations with an established history of working with their communities are more likely to elicit responses and collect data successfully. They may also be able to assist with constructing more robust sampling frames that include more NHPIs. This requires long-term investments in relationship building and high-level staff dedicated to maintaining those relationships with NHPI organizations.

C. Diversify data collection methods – Consider collecting both qualitative and quantitative data. Non-probability methods such as snowball sampling may also be sufficient for research projects.

VII. Collect and store the minimal amount of data required.

Context: Data security and privacy are implicated during the data collection phase due to the increasing frequency and severity of data breaches. When excessive amounts of data are collected and stored in one location this increases the risk data breaches will lead to harm. Companies that do not maintain and comply with a data retention policy or collect more data than is necessary place the public at risk that their stolen data will be misused. For example, some NHPI communities have a relatively high rate of poverty, making them more vulnerable to financial data breaches, which can lead to fraudulent withdrawals or credit card charges. Data breaches may also harm NHPI immigrant communities, since they can make it easier to identify individuals that may be threatened based on their immigration status.

A. Data retention policies should limit the length of time that data are stored - Data collected and stored should be limited to narrow use cases to the extent possible.

B. Regulate data brokers and data purchasers - Require acquired data to be mapped to their sources and open to government agency audits.

C. Develop systemic policies to encourage data organizations to protect data - Limit reliance on individual rights and notices to individuals that burden them with the obligation to take actions that hold data organizations accountable. Develop systemic policies that focus on incentives and disincentives for data organizations to better protect data.

Pillar 2: Data Analysis

CHALLENGE: Analyzing NHPI data without the participation of NHPI community experts creates an unnecessary risk of misinterpreting the data. This misinterpretation can lead to ineffective and harmful policies, as well as motivate NHPI communities to disengage from institutions and agencies responsible for serving them.

As machine learning and artificial intelligence systems proliferate in the private and public sector and research institutions, the potential for discriminatory outcomes and feedback loops can increase inequitable treatment of communities. Reliance on potentially biased data sets have led to biased law enforcement[xvii] and health programs. Inclusion of NHPIs in the analysis of NHPI data provides essential context that can mitigate these risks.

Recommendations

I. Apply community-centered principles to NHPI data analysis.

Context: While CBPR principles should be applied throughout the process of developing data systems that are responsive to the community, it is particularly valuable with regard to data analysis. The central purpose of analyzing NHPI data should be to ensure that the analysis is relevant for NHPI communities and that the data are utilized for the community's benefit.

Specific steps that can be taken by government agencies, institutions, and private actors to implement CBPR principles include the following:

A. Prioritize collaborative relationships and partnerships with NHPI communities - Data collection entities should invest in developing long-term relationships with communities prior to implementing research and data collection projects. They should avoid taking actions that treat partnerships with NHPI communities as purely transactional and existing only as long as NHPI involvement is beneficial to their data agenda.

B. Identify and build on NHPI communities' strengths, resources, and expertise - NHPI communities are often defined in data sets through deficit models that emphasize disparities they must work to overcome. A more complete understanding of NHPI communities will encourage analysis that incorporates community-centered holistic perspectives and cultural knowledge. This approach will lead to more insightful findings and augment program development and evaluation metrics.

C. Utilize an iterative community input and feedback process - The U.S. Digital Services Playbook provides an iterative product management framework that can

Build Community Capacity

Invest in the ability for NHPI community organizations to utilize data analytics tools. This will enable NHPI organizations to conduct in-house analysis and direct methods and lines of inquiry without remaining dependent on outside expertise. This in turn will grow the NHPI community's ability to integrate cultural knowledge into analysis and contribute to data systems processes.

Utilize Community-Centered Principles

Avoid transactional relationships with NHPI partners that create the impression that they are only important when other actors need them for self-serving purposes. Demonstrate an understanding of the importance of relationships and shared values by building bridges with NHPI communities before an agenda requires it. This will facilitate participation of NHPI partner contributions when relevant data requires analysis.

apply toward data analytics processes. Providing opportunities for input and feedback from NHPI communities will deepen buy-in and reinforce relationships with data systems operators and researchers. It will also allow for more comprehensive involvement and application of NHPI community and cultural knowledge to the data analysis. This process also ensures that analytical focus will be on data that is relevant for NHPI communities.

II. Prioritize data analysis that meets urgent NHPI community needs.

Context: Research institutions and government agencies often focus on pre-existing organizational, funder-driven, or research-driven priorities that may not align with issue areas that are a higher priority for NHPIs.

A. Lead with a community needs assessment - Partner with local NHPI organizations to assess highest needs in the communities and frame analysis around priorities of the community.

III. Utilize enhanced measures in algorithmic analysis and evaluations to protect against discriminatory outcomes.

Context: NHPIs are at risk of inequitable treatment and discriminatory outcomes by algorithmic systems and data that are biased. Numerous examples of discriminatory outcomes, in which groups are unfairly treated as a result of the application of poorly regulated automated algorithmic products, exist in criminal justice[xviii] and employment practices[xix], to name a few areas. These outcomes can occur when flawed algorithms rely on biased data, which leads to actions that generate feedback loops through actions that produce more biased data. NHPI participation in the development of these data systems and mandating human reviewers can safeguard against harmful outcomes.

A. Audit data sets - Regularly assess data sets for bias and demographic proxies with the assistance of NHPI community experts that can provide historical and cultural context for the data.

B. Conduct comprehensive disparity evaluations of algorithmic models - Utilize multiple ongoing measures to evaluate algorithmic models that lead to disparate treatment.

C. Build community oversight into data systems - Implement a NHPI community oversight body to review and evaluate algorithmic processes and recommend appropriate mitigation measures.

D. Provide regular and transparent reporting of audits - Publish regular independent assessments pertaining to major components of algorithmic analysis and decision-making that includes but is not limited to data robustness, equity, and disparity testing.

Pillar 3: Data Use

CHALLENGE: NHPI communities have observed with great concern how data systems operated by government agencies and private actors have been used to harm and discriminate against underserved and marginalized communities through practices such as redlining, targeting communities such as Japanese Americans during World War II and Muslim Americans post-9/11, and establishing racist blood quantum measures to limit access to government programs.

The community's data are increasingly vulnerable to harmful and discriminatory use due to data brokers and technological advancements that allow for the widespread adoption of machine learning and AI products. The development of algorithms that lack NHPI data also pose a threat in law enforcement, employment, and medical treatment related contexts, among others.

Recommendations

I. Develop and implement a data stewardship framework[xx] that applies throughout the data life cycle in partnership with NHPI communities.

Context: Data are increasingly valuable commodities that are often exploited without meaningful consent from communities the data are gathered from. A data stewardship framework that preserves principles of individual autonomy and a community's right to self-determination will mitigate harm caused by misuse of data.

A. Utilize enforceable data use agreement provisions – Data organizations should view themselves as data stewards and consent to enforceable provisions governing data use around the following areas:

1. Require meaningful informed consent of participating NHPI communities.
2. Provide transparency regarding the design and deployment of data systems and algorithms that impact NHPIs in areas where disparities already exist.
3. Ensure NHPI communities have access to their own data.
4. Set clear data sunsetting/destruction timelines.

B. Support the development of community-centered intellectual property (IP) licenses – IP licenses that prioritize protecting communities from being harmed by the misuse of the community's data should be developed, published, and utilized. For example, Native American communities have developed organizations dedicated to preserving traditional knowledge, art, and genetic resources. However, current legislation and policy, such as the Trademark Law Treaty Implementation Act and

Build Community Capacity

Fund the development of an ongoing curriculum that educates NHPI communities on how their data are used, what they are used for, and the consequences of misuse. This can include implementing supportive data infrastructure such as algorithm registries similar to the one launched by Helsinki and Amsterdam.

Utilize Community-Centered Principles

Formalize operating norms, meaningful informed consent practices, and conflict resolution policies that govern data use in partnership with NHPI communities.

Indian Arts and Crafts Act, have not sufficiently protected those cultural and genetic resources from misuse or exploitation. The protection they do provide does not currently extend beyond indigenous communities that are not federally or state recognized tribes.

II. Support legal frameworks that provide broad protection against abusive data use practices that harm or exploit communities.

Context: Examples of existing data equity legal frameworks that provide potential models for protecting against exploitative, abusive, and discriminatory uses of data include:

1. California Consumer Privacy Act (CCPA)[xxi]
2. Illinois Protecting Household Privacy Act (PHPA)[xxii]
3. General Data Protection Regulation (GDPR)[xxiii]
4. European Commission Regulatory Framework Proposal on Artificial Intelligence[xxiv]
5. Data Security Law of the People's Republic of China[xxv]
6. The White House, Blueprint for an AI Bill of Rights[xxvi]

<u>A. Strengthen agencies responsible for protection of vulnerable communities and consumers</u> - Support advocacy to strengthen existing agencies tasked with protecting vulnerable communities and consumers against data misuse, such as the Consumer

Financial Protection Bureau and the Federal Communications Commission.

B. Support policies that protect cultural knowledge and assets - Support development of new policies and regulations in consultation with NHPI communities that protects cultural knowledge and assets.

III. Institutionalize Community Oversight Bodies

Context: Citizen oversight in various forms already exists in a variety of areas, including public safety, election integrity, and zoning. NHPI representation through these bodies can serve to ensure that NHPI communities have an avenue through which concerns can be voiced and addressed to relevant parties and require corrective action, if necessary.

A. Employ Independent Reviewers - Allow community bodies access to independent reviewers to analyze data usage for inequitable outcomes across relevant measures. An example of a community body is a community advisory board made of members of the NHPI community.

B. Provide Meaningful Auditing Authority – Provide community bodies with the authority to monitor and audit data practices and incentivize institutional responses that align with recommendations.

Pillar 4: Data Access

CHALLENGE: NHPI communities are not prioritized as data consumers when access and dissemination plans for existing NHPI data are designed. This results in existing data sets being inaccessible, because they are difficult to locate, require expertise in specialized data tools, buried within academic or technical language, or obscured by complex user interfaces.

Recommendations

I. Increase data accessibility for NHPI communities.

Context: Data systems are often developed independent of NHPI community concerns and for different audiences that have priorities that do not align with advancing NHPI community interests. Making data accessible in this context means working with NHPI communities to make the data easy to locate and comprehensible, as well as in a user-friendly format for NHPI community members. The dissemination methods below should include iterative review processes informed by models such as the U.S. Digital Services Playbook[xxvii] and Civic User Testing Group.[xxviii]

A. Provide physical data reports - Many NHPIs lack reliable broadband connections or have limited computer access. Physical copies can allow broader dissemination throughout NHPI communities and easier sharing through community education and outreach events, households, and religious centers.

B. Ensure data reports are translated into NHPI languages - Language plays a central, unifying role in many NHPI communities and is an important medium for perpetuating culture. This includes Pacific Islander communities with high limited English proficiency rates and Native Hawaiians, whose language was almost eradicated by colonial policy.[xxix]

C. Ensure user-friendly interfaces for digital data resources - Data visualizations provide ample opportunity to convey a wide range of data content, but these tools must be produced with NHPI community participation to ensure accessibility. Iterative feedback models provide a framework for developing user-friendly digital interfaces and adaptive web designs.

II. Develop flexible policies for balancing detailed data needs and privacy concerns.

Context: Strict data suppression thresholds prevented NHPI COVID-19 data from being published. This delayed the development of policies and programs tailored for NHPIs communities that could have mitigated the pandemic's impact. It also disadvantaged NHPI organizations advocating for resources.

Build Community Capacity

Partner with NHPI community organizations to conduct trainings and provide software that will allow existing data sets to be utilized as well as developing joint data storytelling templates.

Utilize Community-Centered Principles

Involve NHPI communities in the development of dissemination and translation procedures and plans early on. This includes listing NHPI contributors as co-authors and providing opportunities to be co-presenters. The dissemination plan should include policy-oriented actions intended to allow the data to benefit NHPI communities.

A. Develop community consultation policies for exigent circumstances - Consultation with NHPI community leaders and organizations can inform the development of flexible data reporting policies during public health emergencies or catastrophic environmental disasters.

III. Establish a centralized NHPI data repository and portal.

Context: The time, effort, and expertise required to locate and access NHPI data can be significantly reduced by creating a centralized repository of NHPI data sets, reports, and tools and community-friendly portal. This will promote self-sufficiency and increased flexibility without having to rely as much on outside expertise to conduct literature reviews. This will also allow resources to be diverted from data searches to program implementation.

A. Fund development of NHPI community-centered data tools - Provide resources to develop and sustain an NHPI community-driven data portal.

Introduction to Priority Areas of Need

Understanding the data needs of the community requires examining the issues they face daily, extracting the data points needed to tell the stories of those challenges and matching those data needs to the system that is responsible for making that data available. The following section provides brief summaries of priority issue areas facing Native Hawaiian and Pacific Islander (NHPI) communities as identified by community leaders who support and serve communities across the country. Data inequities contribute to the growing disparities that impact NHPI families in these issue areas.

Nine priority issue areas were identified and include Civic Engagement, Climate Justice, Community Capacity, Criminal Justice Reform, Economic Justice and Housing, Education, Health, Immigration, and Women's Rights. We caution readers that these are not the only areas where data on NHPI populations is needed; a number of topics could not be covered, partly because of space limitations, but are equally important. We highly encourage researching areas unexplored in this document to enhance understandings of this population's unique needs and strengths.

These following subsections were prioritized because they were identified by NHPI communities from our focus group discussions. Additionally, they were determined by asking participants about the challenges they face and issues they observe in the NHPI community that they are a part of and work with. Afterward, a second round of convenings were organized for participants to attend based on their interest(s) in any of the topics. These sessions focused on uncovering the data gaps within each issue area and how it has impacted the work of and for NHPI communities. The information gathered informs these subsections, which include the topic's context with respect to NHPIs, references to any data available on the topic, challenges imposed by a lack of data, detailed data needs under each issue area, and quotes directly from NHPIs who participated in this effort. Ultimately, the purpose of this chapter is to clearly inform audiences of the specific data needs that prevent us from truly understanding the assets and issues of NHPI communities at large.

Civic Engagement

Native Hawaiian and Pacific Islander (NHPI) communities are not prioritized as data consumers when access and dissemination plans for existing NHPI data are designed. This results in existing data sets being inaccessible, because they are difficult to locate, require expertise in specialized data tools, buried within academic or technical language, or obscured by complex user interface

Native Hawaiian and Pacific Islander (NHPI) communities have a complicated history with the United States that has varying impacts on the communities' abilities to fully engage in the civic processes that contribute to democracy. These relationships stem from a long and painful history of military and colonial expansion that has led to confusing immigration and citizenship laws that determine voting rights, political engagement, and advocacy.

Although NHPI leaders have a history of advocating and engaging with policymakers on critical issues such as health disparities and meeting NHPI disaggregated data needs, the community faces barriers to civic participation due to the lack of NHPI representation in data. Access to NHPI civic engagement data would allow community organizations to strengthen their ability to advocate for much needed resources and equitable policies, provide policymakers with a more accurate portrait of their constituents, and build strategies to better engage its growing population in civic processes.

In California, where the second largest population of NHPIs reside, nearly one-third of all NHPI adults report "never" or "sometimes" voting in presidential elections, and 45% report the same pattern in state and local elections.[xxx] In contrast, 18% and 28% of white adults report the same patterns, respectively.[xxxi] Even though NHPIs report lower voter participation rates than their white counterparts, NHPI voter participation in the 2016 and 2020 presidential elections rose from 41% to 56%.[xxxii]

The institution of the Native Hawaiian and Other Pacific Islander racial category in the 2000 Census provided critical data that gives the community a greater sense of inclusion and validation and has encouraged growing participation in subsequent census counts and local organizing to advocate for greater equity, as seen in COVID-19 response efforts.

NHPI leaders from across the country expressed a desire to integrate NHPI communities more effectively into civic processes such as voting, running for public office, census, redistricting, and advocacy. Greater engagement will ensure that NHPI needs and solutions contribute to a more inclusive democracy. Given the complexity of U.S. relationships with island nations of origin for this population, leaders recognize that awareness and education is at the foundation of building greater engagement, even though multiple

Data Needs

- Voter registration
- Voter turnout
- Voter behavior
- NHPI public opinion
- Impacts of voter suppression
- Census response rate

"It's always a challenge speaking with members of Congress, especially those who represent districts in states that have majority of NHPIs and know nothing about them. They never are aware of how issues impact our community, so there's a lot of education that has been going on and it's still going on today." – NHPI community leader

"I remember being the only Samoan at the Democratic conventions for a while… going to these API Caucuses and we're talking about NHPIs and their experiences… and not having one Pacific Islander in the room." – NHPI community leader

generations have been born here. Quality civic engagement data will educate the NHPI community, policymakers, government entities, researchers, funders, and all who contribute to civic infrastructures. Data systems must seek to collect and provide granular civic participation and policy impact data from local, state, and national levels.

Climate Justice

The consequences of heatwaves, flooding, drought, and wildfires, and other extreme weather events are reverberating everywhere Native Hawaiians and Pacific Islanders (NHPIs) reside, from our ancestral homelands in the Pacific to the U.S. In the Marshall Islands, extreme drought has threatened potable water sources.[xxxiii] The Tongan Development Bank, which has only two people dedicated to climate finance,[xxxiv] is prevented from accessing resources such as the Green Climate Fund without completing an accreditation process.[xxxv] Overall, the United Nation's 2022 Emissions Gap Report[xxxvi] predicts that the world's current path will result in climate disaster unless systems-wide transformation occurs. As a result, NHPIs residing in their home islands will likely be compelled to migrate to other countries where substantial NHPI communities have already been established, such as the U.S.

In the U.S., the Environmental Protection Agency has identified indigenous populations, including Pacific Islanders, as disproportionately vulnerable to health impacts of climate change.[xxxvii] This is due in part to NHPIs experiencing institutional barriers that can limit access and control over traditional lands and natural resources, pre-existing health disparities, and residing in areas that lack reliable infrastructure.

NHPI institutions and community organizations view climate justice as an interdependent collection of issues that have implications for natural resources, land and water management, and indigenous agricultural frameworks. This holistic view of the deep cultural and practical relationship between the environment and all of the challenges facing NHPI communities has yet to be fully captured by current measures and represents an area that is ripe for further growth. The development of new metrics that move beyond measuring community deficits and capture positive environmental relationships with indigenous environmental practices with proven benefits, such as fire management, flood prevention, and maintaining diverse ecosystems, may guide broader policy choices toward a more sustainable future.

Data are playing an increasingly crucial role in identifying where communities that are vulnerable to extreme climate events reside through measures such as the Centers for Disease Control and Prevention (CDC) Social Vulnerability Index,[xxxviii] which was created to assist public health officials and emergency response planners, and the U.S. Census Bureau's Community Resilience Estimates,[xxxix] which has been utilized by the Federal Emergency Management Agency and local emergency agencies.[xl] These indexes must be audited to ensure that NHPIs are accurately and adequately represented.

Data Needs

- Indicators of environmental justice
- Climate migration patterns
- Climate impact risk
- Particulate matter exposure
- Childhood lead exposure

“We should recognize that any kind of climate justice is a recognition and empowerment of the indigenous peoples and their rights. We are really crucial to combating climate change with… indigenous knowledge… 80% of the natural world that’s still left is controlled by indigenous peoples, so we oversee a good portion of the biodiversity in this world that is crucial for… maintaining a good balance and a good ecosystem and combating climate change.” – NHPI community leader

Community Capacity

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Data Needs

- Amount of governmental and philanthropic funding allocated and available to NHPIs
- Research funds in NHPI communities
- Impact of investment in NHPI organizations
- NHPIs in executive or senior leadership roles
- Public-private partnerships involving NHPI organizations

"We always volunteer ourselves to do something. That's how we are. We like to help others. And I think it's a culture thing, but then there's also times that we think about it, because we also have family. How [do] we put food on our table if we run a nonprofit and we don't get paid out of what we do?"

– NHPI community leader

Criminal Justice Reform

Native Hawaiians and Pacific Islanders (NHPIs) have historically experienced discriminatory treatment at the hands of law enforcement and at each stage of the criminal justice system. A recent study found that NHPIs have been victims of fatal police violence at high rates that are comparable to American Indians or Alaska Natives and Black or African Americans.[xli] In 2010, a report by the Office of Hawaiian Affairs found that Native Hawaiians were disproportionately impacted by arrests, pretrial detention, admissions, probation, and incarceration.[xlii] In Hawaiʻi, the share of single-race NHPI prisoners under state jurisdiction was 44% in 2020[xliii], despite being only 11% of the state's population[xliv]. In Utah, single-race NHPIs prisoners under state jurisdiction represent just over twice of the prisoner population (2.28%[xlv]) as their share of the state's population (1.13%[xlvi]). The consequences are also borne by NHPI families who become separated when incarcerated relatives are sent to prisons thousands of miles away, such as the 1,200 Hawaiian inmates at Saguaro Correctional Center in Arizona.[xlvii] The disconnection from familial support systems increases the difficulty of achieving rehabilitation.

Fortunately, NHPIs possess cultural resources and traditions that provide opportunities to address these inequities as well as promote meaningful reentry to communities. One of the values common across NHPI communities is resilience through families and social networks. A thriving community can help individuals recover from financial, psychological, and even spiritual challenges. F.O.U. Movement[xlviii], a Samoan organization based in Long Beach, California, assists formerly incarcerated gang members by fostering resilience through programs that promote community reintegration, youth outreach, and sobriety. However, barriers such as systemic racism must still be addressed. Capturing the extent of those barriers and their consequences will require more comprehensive data collection and reporting on NHPIs.

NHPI communities have also expressed concern that youth are being incarcerated at disproportionately high rates. Data from the San Francisco Juvenile Probation Department indicates that Samoan youth are booked into juvenile hall at a rate approximately four times higher than their share of the youth population in San Francisco.[xlix]

Care must also be taken to ensure that related data are not misused in ways that harm NHPI communities. Predictive algorithms that assign risk scores and attempt to assess the likelihood that someone will commit a crime have been found to generate feedback loops that perpetuate discriminatory treatment based on biased data.[l] Data brokers may amass sufficient information about individuals that could potentially allow employers and businesses to determine whether individuals have a criminal record, despite laws such as California's "ban the box" Fair Chance Act.[li]

Data Needs

- Law enforcement-focused police-community interaction
- Incarceration
- Youth in criminal-legal system
- Children impacted by criminal-legal systems

> ***“Here in Hawai‘i, even though the data is out there to help us… [we’re] just not being helped, because we’re Micronesians. We’re COFA citizens. Our problem here in Hawai‘i right now is if the people of Hawaii, and it’s even in the system or even in government, if they get past this discrimination mindset that they have, then we’ll have a better chance of getting better help. But right now, we have to fight for everything.” – NHPI community leader***

Economic Justice and Housing

Economic and housing justice involves ensuring a level playing field where any individual can move up in the socioeconomic ladder by earning a livable income to afford a home. For Native Hawaiians and Pacific Islanders (NHPIs) in the U.S., who have an average per capita income of $24,961, economic mobility can be more difficult.[lii] Earnings can be stretched even more thinly for a vast number of NHPIs who regularly send remittances to their families living overseas and also have familial obligations in which it is customary to give monetary support to relatives for funerals, weddings, and other special circumstances. These financial responsibilities are part of the NHPI collectivist culture that keeps communities afloat.

However, these customs may not sustain NHPIs long term, especially in the U.S. where the cost of living is high and access to high paying jobs are low. National data from 2019 show that NHPIs had higher rates of poverty compared to non-Hispanic whites; 14.8% compared to 9.0%.[liii] Despite these numbers, it is notable that in 2013 and 2018 NHPIs have consistently had the highest labor force participation rates than any other racial or ethnic group in the U.S.[liv] NHPIs are thus actively participating in the workforce to make better lives for themselves, but other factors may be driving income disparities. Unfortunately, data are not available on NHPIs by their detailed occupations, which makes it harder to know where NHPIs work and what changes need to be made to increase their access to higher wages.

Housing and homeownership data among NHPIs is also not easy to come by. Although in Hawai'i, trends show that Native Hawaiians have had lower home ownership rates than their white counterparts from 2005 to 2014 and an ever-lengthening waitlist of indigenous individuals need affordable housing.[lv]

Housing has increasingly become a health concern for NHPIs overall as many live in multi-family and multi-generational households, putting them at a greater risk of transmission of COVID-19. NHPI populations also have the highest rate of homeless in the U.S. with a rate of 159.8 per 100,000, which is over two times higher than the second highest rate.[lvi]

Additional data are needed to support houseless communities as well as to understand the barriers to housing for homeowners and renters. NHPI communities voice that in the future this data could be used to increase employment opportunities, resources for businesses, financial literacy, and success in navigating the housing market.

Data Needs

- Detailed occupation
- Employer-sponsored retirement plan or other retirement savings
- Wealth holdings and debt
- Percentage of incorporated businesses
- Household sizes
- Homeownership vs renter rates

"How many [NHPI] families reside in one household? If there's a high number of families living together throughout the nation where there's NHPI communities, then that would probably let us know that they're not able to buy a home for themselves... Or don't have access to the resources that'll enable them to buy or rent on their own, which can also be tied back to employment" – NHPI community leader

Education

Formal and informal education systems helped ensure Native Hawaiians and Pacific Islanders (NHPIs) developed thriving communities long before the arrival of European explorers. NHPIs had sophisticated and sustainable land cultivation and water use practices[lvii] that required maintaining accurate knowledge and passing it on for generations. Medicine was also taught by professional healers.[lviii] Families and communities were also responsible for educating youth on a broad array of interrelated topics that included navigating complex social structures, gaining occupational skills through hands-on experience and leadership duties.[lix]

Unfortunately, NHPIs face persistent structural challenges in both K-12 and higher education. The U.S. Department of Education's Office for Civil Rights found that NHPI students represented "48% of all suspensions, 68% of expulsions, and 48% of all school-based referrals to law enforcement," despite comprising only 30% of Hawai'i's students.[lx] In Washington, NHPI students were disciplined twice as frequently as white students.[lxi] Approximately 25% of NHPIs in higher education have earned a bachelor's degree or higher, compared to 35% for the U.S. population.

Data gaps make it difficult to track national trends, since NHPI data are often not reported or provided in formats that require additional processing. Many data sets also utilize single-race categories, which undercount the large share of multiracial NHPI students. Mandating the collection and reporting of standardized multiracial NHPI data would help address these issues. Lowering the barrier for resources to support NHPIs also has the potential to raise NHPI graduation rates.

Higher education institutions are currently allowed to possess only one minority serving institution designation for particular student populations, regardless of whether they would be eligible for multiple designations. As of September 2022, there are 29 institutions funded under the Asian American and Native American Pacific Islander-Serving Institutions Program[lxii] out of 199 eligible institutions[lxiii].

NHPI students must often prioritize financial, family, and cultural commitments that conflict with inflexible schedules at Western education institutions. This may explain why a report found that NHPIs had a larger share of first-time freshmen attending for-profit colleges than any other racial or ethnic group in California,[lxiv] since such institutions often allow for students with work schedules.

Data Needs

- K-12 performance measures
- Limited English proficiency in K-12
- NHPI teacher and educational workforce
- Higher education, graduate, and professional training performance measures
- Retention of students in higher education
- Visibility of multiracial/multi-ethnic NHPI students
- Amount and types of scholarships awarded to NHPIs

"We had the Pacific islander Initiative at Cal for many of those young people, and we had to fight for that. Now we have a Pacific islander Initiative and, talking to the young Pacific Islanders now that are at Cal, they said, 'For the first time we feel like we're seen.'... It makes a big difference, the importance of being seen as Pacific islander [in higher education]." – NHPI community leader

Health

Decades of strong evidence demonstrates that Native Hawaiians and Pacific Islanders (NHPIs) are disproportionately impacted by chronic diseases and mental health conditions, yet little attention and few resources have been allocated to address these challenges. Effective interventions must be based on understanding and addressing the root causes of those disparities as well as leveraging the community's inherent strengths. This requires a holistic approach that examines the historical relationship between NHPIs and the U.S., the impact of colonization and dispossession of land, and the current physical, environmental, and socio-economic conditions NHPIs reside in today.

Heart disease is the leading cause of death among NHPI and is responsible for 1 in 3 NHPI deaths between 2018 and 2020.[lxv] Cancer was the second leading cause of death. A National Health Interview Survey for NHPIs conducted in 2014 found that the age-adjusted rate of NHPI adults diagnosed with diabetes was nearly twice that of the total U.S. population.[lxvi] These conditions highlight the importance of access to affordable healthcare and public assistance programs. Numerous NHPI community organizations also have experience developing culturally and linguistically tailored health education and intervention programs that ensures effective community participation.

The COVID-19 pandemic presented a stark example of the devastating impact chronic health diseases, socio-economic conditions, and environmental factors can have after decades of underinvestment in NHPI communities. Transmission was likely exacerbated by high rates of comorbidities, overrepresentation as essential workers, and residing in large multigenerational households. Many local and state-level COVID-19 data systems did not collect or report disaggregated NHPI cases, deaths, hospitalizations, or vaccine uptake. Of the 20 states that did report disaggregated NHPI data, NHPIs had the highest COVID-19 raw case rate in 16 states and the highest COVID-19 mortality rates in 10 states.

Data will continue to grow in importance as a critical resource for addressing health issues as innovation in fields such as precision medicine and AI-assisted healthcare develop. The gaps in data systems at all levels and across all health issues that prevent NHPIs from fully participating in programs and research is a form of structural racism that can and must be addressed.

Data Needs

- Chronic disease rates
- Food access
- Mental and behavioral health
- Alcohol and other drugs
- Sexual health
- Early detection
- Healthcare access
- Health workforce

"When we talk about these Western concepts of prevention, right, so even to get past that, [we] don't understand that [we're] supposed to be going to annual screenings. Like, what is that? What does that mean? And so, why is that important? We don't go see a doctor till we don't feel good." – NHPI community leader

Immigration

Decades of strong evidence demonstrates that Native Hawaiians and Pacific Islanders (NHPIs) are disproportionately impacted by chronic diseases and mental health conditions, yet little attention and few resources have been allocated to address these challenges. Effective interventions must be based on understanding and addressing the root causes of those disparities as well as leveraging the community's inherent strengths. This requires a holistic approach that examines the historical relationship between NHPIs and the U.S., the impact of colonization and dispossession of land, and the current physical, environmental, and socio-economic conditions NHPIs reside in today.

Heart disease is the leading cause of death among NHPI and is responsible for 1 in 3 NHPI deaths between 2018 and 2020. Cancer was the second leading cause of death. A National Health Interview Survey for NHPIs conducted in 2014 found that the age-adjusted rate of NHPI adults diagnosed with diabetes was nearly twice that of the total U.S. population. These conditions highlight the importance of access to affordable healthcare and public assistance programs. Numerous NHPI community organizations also have experience developing culturally and linguistically tailored health education and intervention programs that ensures effective community participation.

The COVID-19 pandemic presented a stark example of the devastating impact chronic health diseases, socio-economic conditions, and environmental factors can have after decades of underinvestment in NHPI communities. Transmission was likely exacerbated by high rates of comorbidities, overrepresentation as essential workers, and residing in large multigenerational households. Many local and state-level COVID-19 data systems did not collect or report disaggregated NHPI cases, deaths, hospitalizations, or vaccine uptake. Of the 20 states that did report disaggregated NHPI data, NHPIs had the highest COVID-19 raw case rate in 16 states and the highest COVID-19 mortality rates in 10 states.

Data will continue to grow in importance as a critical resource for addressing health issues as innovation in fields such as precision medicine and AI-assisted healthcare develop. The gaps in data systems at all levels and across all health issues that prevent NHPIs from fully participating in programs and research is a form of structural racism that can and must be addressed.

Data Needs

- Undocumented population
- Deportation
- Climate migration
- Visa backlogs
- Students impacted by immigration status
- Resource allocation by federal agencies for U.S.-Affiliated Pacific Islands nations

"[M]ost of us have undocumented family members, but we don't know how many there are or what percentage of our community are undocumented. This makes it hard for us to see what they need and what they have access to in terms of healthcare, housing, job security, and so many other life-determining factors. What do we need to do to have this data?" – NHPI community leader

Immigration Status by Pacific Island Country of Birth

U.S. Citizen	***U.S. National***	***COFA Migrant***	***Immigrant***
• Includes Hawai'i (U.S. state), Guam, Commonwealth of the Northern Mariana Islands	• American Samoa	• Federated States of Micronesia, Republic of the Marshall Islands, Republic of Palau	• Fiji, Kiribati, Samoa, Tonga, and Others
• Live and work in U.S. legally; vote in elections	• Live and work in U.S. legally; must be naturalized to vote in elections	• Live and work in U.S. legally; must be naturalized to vote in elections	• Must apply for LPR status to live and work in U.S. legally; must be naturalized to vote in elections

Women's Rights

Native Hawaiian and Pacific Islander (NHPI) women are the stronghold of the family, so their well-being is paramount to promoting and upholding a thriving community. Although many NHPI cultures are matriarchal, the unequal treatment of women exacerbates existing disparities NHPI communities face. The lack of data on NHPI women's issues hinders the community's ability to provide necessary support and services for NHPI women.

Critical areas of need for NHPI women expressed by the community include healthcare with an emphasis on maternal health, reproductive rights, gender-based violence, and pay equity.

Maternal and infant health data includes infant mortality rate, pregnancy-related deaths, and prenatal and birthing resources. A Kaiser Family Foundation report[lxvii] published in November 2020 shows that NHPI women, alongside their Black and American Indian/Alaska Native counterparts, have higher shares of preterm births, low birthweight births, or births for which they received late or no prenatal care compared to White women. NHPI women are five times more likely than White women to not begin receiving prenatal care until the third trimester or to not receive any prenatal care at all. The infant mortality rate in NHPI births is second to that of Black births. NHPI women experience pay inequity that hinders their financial independence. On average, Native Hawaiian women made 57 cents and Pacific Islander women made 66 cents to the White non-Hispanic male dollar.[lxviii]

The scarcity of disaggregated data in NHPI women's issues mutes the community's ability to advocate for the protection of their rights, including reproductive healthcare and gender-based violence. Currently, most of the existing data on women's issues is provided in the AAPI (Asian American and Pacific Islander) data category, which does not capture the experiences of NHPI women accurately.

While women across the country face a similar fight in protecting their fundamental rights, solutions to these issues and the resources necessary to carry those solutions out vary across communities. The needs for culturally relevant services, education, and providers were important strategies necessary to bring parity to NHPI women. However, data are needed to support the development and implementation of these solutions.

Data Needs

- Maternal and infant health indicators
- Prenatal and birthing practices
- Teen pregnancy
- Gender-based violence
- Human trafficking
- Pay equity gap

"I am always seeing a gap at the national level in data just specifically for NHPI women. We often get asked, or sometimes we don't, from AAPI groups to participate in campaigns that focus on these issues, and you know we're always in question about how are we supposed to participate when we don't know what the data is and where did you get your data from, especially when it comes to our community. So, I'm always kind of seeing that gap missing, especially around reproductive rights and pay equity." – NHPI community leader

Introduction to Specific Population Considerations

The Tongan proverb "Pikipiki hama ka e vaevae manava" ("Let's link our outriggers so we can share life") emphasizes the importance of community cohesion to the sustainability of a thriving Native Hawaiian and Pacific Islander (NHPI) community. The diversity in the NHPI community extends beyond culture and language. The globalization over the past centuries has imposed borders, identities, and citizenships that have contributed to more diversity in the community and prompts a greater responsibility to ensure that all parts of the community are given care, attention, and the support they need. More importantly, it is of utmost importance to center the lives of those who have been pushed to the margins because of shifting societal standards to ensure that no outrigger is left alone in the waters.

The initial series of focus groups asked community members to identify priority issues in the communities they work with. The findings from those discussions raised issue areas of need as well as key parts of the NHPI community whose issues, though similar, had unique root causes and needed their own considerations for strategies, approaches, discussions, and tools.

The Native Hawaiian community in Hawaiʻi lives on the indigenous lands of their ancestors and experiences outcomes rooted in their forced displacement from the land that is the source and core of Hawaiian livelihood. The outcomes of this severance require depth of understanding and consideration for effective strategies and advocacy. The Compact of Free Association (COFA) community holds several island nations in a specific political relationship with the U.S. that can shift every time the compact is up for renewal. These unique circumstances require diligent and consistent attention in the work community leaders conduct with policymakers. Lastly, and not ever least, is the NHPI LGBTQIA+ community, who faces discrimination at every turn with mounting policies that push them further into the shadows of an already invisible community.

Data equity is paramount in achieving overall equity for NHPI communities. The same value is necessary for the parts of the NHPI community that are most marginalized; there will be no equity without them. The community will thrive when all outriggers are connected to amplify the strengths, needs, and voices of all parts of the community.

Compact of Free Association (COFA) Population

A 2018 enumeration of the COFA migrant population in the U.S. showed a 68% population growth over a nine-year period.[lxix] The Federated States of Micronesia (FSM), Republic of the Marshall Islands (Marshall Islands), and Republic of Palau (Palau) each share a unique relationship with the U.S. under agreements called the Compact of Free Association, which allows legal migration to the U.S. to live and work. Migration to the U.S. is prompted by a search for economic and educational opportunity, health care access, and unification with family already abroad. The reasons for migration are rooted in the changing natural environment, due to climate change and the remnants of U.S. nuclear testing, that is resulting in a depletion of food sources, debilitating health outcomes, and recurrence of severe weather events.

The previous enumeration showed that an estimated 50% of COFA migrants are living on the continental U.S., while 26% are in Hawai‘i, 20% in Guam, and 3% in the Commonwealth of the Northern Mariana Islands (CNMI).[lxx] Of those on the continent, the five states with the largest populations of COFA migrants are Washington, Arkansas, Oregon, California, and Texas, listed in descending order of population size. According to the GAO Compacts of Free Association Populations in U.S. Areas Have Grown, with Varying Reported Effects report,[lxxi] those who moved to Guam and CNMI stated their reasons for choosing the territories as their proximity and similarity in culture to their home islands. Migrants in some of the U.S. states like Oregon and Arkansas cited the lower cost of living, greater opportunity for employment, and greater safety from discrimination than in Hawai‘i.

Data Needs

- Social determinants of health
- Medicaid, FAFSA, Other public benefit utilization
- Anti-Micronesian hate
- Youth migration
- Student success
- Voter turnout
- Incarceration

The enumeration process is one of the few sources of data for the COFA population because their data are subsumed under the NHPI data category rendering issues faced by this community invisible. The pandemic amplified the disparities faced by the COFA population due to lack of access to public benefits and resources for families. Disaggregated ethnicity data on social determinants of health is essential to building infrastructure by community organizations that provide direct services for this population. COFA leaders expressed a need for data for resource use in healthcare, education, immigration, employment, housing, civic engagement, and civil rights. Encouraging local entities in regions with high COFA population to collect and report disaggregated ethnicity data for COFA populations is one way to bring data equity to this vulnerable population.

"I would like to ask if there is data collected on the number of youth that have migrated to the U.S. in the past 10 years? There has been a large exodus of young people from Pohnpei and possibly the whole of the FSM since the last census, 2010. Unfortunately, we do not have the expertise to share a clear picture of the negative impacts of such exodus from the youth and FSM population in general. One clear example is the role that youth play during our traditional activities.

This year alone there were over 200 young Pohnpeians who left for the US mainland for employment (specific) opportunities. So in line with our discussions, while it is tailored to the U.S. and its territories, it is my hope that the data collection can also reflect the more pressing need of investment in the islands in the specific areas of better data collection systems, language, cultural activities, health and employment opportunities." – COFA community leader

LGBTQIA+

Hetero-normality and the gender binary are constructs introduced to Pacific Islanders through Western colonization. There are cultural categories for Non-Binary and Transgender identities across Pacific cultures that predate European arrival in the region, and sexual orientation and practices were fluid and did not carry the stigma later attached by the influx of Christian missionaries. Non-Binary and Transgender members of society were exalted as the keepers of genealogy and family history; stewards of traditional practices such as dance, chant, worship, arts; healers and spiritual practitioners; and experts in fulfilling cultural protocol reserved for both genders. Same sex affinity and the place of Non-Binary and Trans identities in Pacific society were subsumed by the introduction of colonists and missionaries, and over time they were relegated to the margins and treated as outcasts. In the U.S., the Native Hawaiian and Pacific Islander (NHPI) LGBTQIA+ community holds the intersectional burden of discrimination based on gender identity and sexual orientation and being part of an invisible community of color.

Data Needs

- Social determinants of health
- Mental health – suicide, substance abuse
- K-12 youth disciplinary
- Employment discrimination
- Foster, homelessness, effects of displacement

The data for the NHPI LGBTQIA+ community is sparse, and the short list of data that is available falls short of painting an adequate picture of the issues facing this community in several different ways. For example, the Census Bureau currently represents one of the most reliable sources of information on the number of NHPI same-sex couple households. As of 2019, the American Community Survey estimated 1,961 NHPI same-sex households in the U.S. However, this count is limited to heads of household and undercounts the actual number of NHPI LGBTQIA+. Additionally, the CDC's 2019 HIV Surveillance Report,[lxxii] which provides NHPI data on HIV/AIDS, a health issue indicated as a priority, indicates that the HIV case rate for NHPIs was over twice that of the white population. This data does not provide an LGBTQIA+ data category for NHPIs. While this means that the data in the CDC's report is not strictly representative of the NHPI LGBTQIA+ community, their rate of HIV/AIDS is likely significantly higher. Unfortunately, the magnitude of the problem cannot be known until more data are collected and made available.

Other issues raised by NHPI LGBTQIA+ focus groups include gender-based discrimination, health access, mental health resources, and a lack of safe spaces focused on the development and support of LGBTQIA+ community members. More granular data showing the characteristics of this group is necessary in order to inform advocacy for policies addressing specific needs of this community, culturally and linguistically relevant programs, and resources necessary to build the capacity of a self-sufficient and sustainable NHPI LGBTQIA+ community.

"In my state, policies have passed to allow gender-affirming procedures to be covered by health insurance; no longer considered a cosmetic procedure. But, you have to get a doctor to sign off to approve the procedure, and I know many of my friends who have had to go from doctor to doctor to get a sign-off. It's great that we have the policy in place but now another barrier has been created to keep us from accessing the care we need." – NHPI community leader

"[I]n 2012/13 there's a policy that folks could change their discharge paperwork if they were dishonorably discharged [from the military] for being LGBT+. I'd be interested in knowing how many have actually tapped into this considering how many of our people are in the armed forces. The VA didn't really put it out there for people to know." – NHPI community leader

Native Hawaiians in Hawaiʻi

Native Hawaiians developed a complex, sophisticated, and thriving relationship with data long before contact with European explorers. Islands would conduct a census by asking inhabitants to bring rocks to a centralized location, with the number of rocks representing the population count and the size of the rocks representing a community's physical capabilities. But the value of data was not only represented by discrete values and deconstruction of measurable components into individual parts. There was recognition that the relationships between different components mattered, and the way in which those relationships informed or affected environmental conditions mattered. This is reflected in Native Hawaiian mastery of sustainable environmental engineering and farming, wayfinding across thousands of miles of open ocean by observing swells, weather patterns, fish and wildlife, and development of cultural traditions that imparted critical knowledge and skills to new generations.

However, the onset of colonization led to systemic discrimination, which resulted in disparities across numerous issue areas such as health, housing, economic opportunities, and education, among others, that continue to impact Native Hawaiians today. Tackling these issues requires developing and sustaining data systems that accurately capture NHPI strengths and disparities, programmatic successes in addition to failures, to ensure sufficient resources are being allocated properly for Native Hawaiian communities. These data systems must be inclusive and accountable to Native Hawaiian communities. They should represent Native Hawaiians accurately with a disaggregated category used to collect and report Native Hawaiian specific data while utilizing a multiracial definition of Native Hawaiian.

Data Needs

- Impact of institutionalized racism
- Representation in leadership roles
- Environmental health
- Impact of tourism on natural resources
- Impact of culture-based programs
- Federal funding allocations

Data Metrics to Consider

- Health of the land based on existing structures and resources
- Alternative units of measurement to include family unit, relationships, etc.
- Impact on levels of family structure – kupuna, makua, keiki, māhū, etc.

The special relationship Native Hawaiians have with the federal government also supports data sovereignty frameworks that provide a basis for Native Hawaiian ownership and control over the community's data and its use.

The development of improved data systems and investment in Native Hawaiian data skills holds the potential to create innovative data metrics and products that can benefit Native Hawaiians in Hawaiʻi. Although the population leaving Hawaiʻi to seek a more sustainable livelihood continues to grow, the population of Hawaiians on ancestral lands face debilitating odds in all areas that determine health and well-being. These issues include housing, health, education, economic justice, incarceration, and environmental justice and are tied to loss of rights to ancestral lands for this population and impacts of excessive tourism. Improved data systems utilizing cultural frameworks that are led and applied by Native Hawaiians can address the disparities facing the population in deeper ways than the data system that currently exists. Data systems that incorporate Native Hawaiian values may also lead to cost-benefit analyses that consider the interdependent relationships between environmental impacts, economic priorities, and health needs.

Action Steps

Public and private, federal, and local partners can take proactive steps to help address the underlying data needs of NHPI communities that have been described. Below is our call to action to the sectors of our society who, by acting, can vastly shift data ecosystems so that equity is more tangible for smaller populations that have been historically overlooked in data.

Federal Government	❖ Enforce use of major OMB Directive 15 racial and ethnic categories, at a minimum in both data collection and reporting by noncompliant federal agencies (See No Equity without Data Equity: Data Reporting Gaps for Native Hawaiians and Pacific Islanders as Structural Racism[lxxiii] for an audit of federal data resources) ❖ Expand disaggregation to NHPI subgroups, when possible, as a best practice. ❖ Allocate funding for federal and state agencies to modernize and standardize data systems and maintain support staff. ❖ Conduct regular surveys of NHPI communities across federal agency priority issue areas with oversampling, as necessary, to obtain statistically stable estimates. (See NHPI National Health Interview Survey[lxxiv]) ❖ Revise federal research grant applications guidelines to incentivize use of NHPI subgroups when collecting racial and ethnic data. ❖ Establish advisory groups with NHPI community leaders to inform policy development and implementation. ❖ Support policies that audit public and private data systems to reveal potentially discriminatory and harmful uses and recommend safeguards.

State Governments

- Increase funding for technological advancement to state and local agencies to improve and standardize data systems that are inclusive of NHPI populations.
- Support policies and regulations codifying use of NHPI demographic categories and enforcement mechanisms when race and ethnic data are collected by state agencies and recipients of state funding.
- Incentivize data interoperability and linkage capabilities across state agencies, education and health institutions, and businesses.
- Adopt policies that increase data granularity for NHPI subgroups.
- Encourage state agencies to establish advisory groups with NHPI community leaders to inform policy development and implementation and accountability metrics.
- Support policies that audit public and private data systems to reveal and reduce potentially discriminatory and harmful uses.
- Support data systems workforce development programs.

County and Municipal Governments

- Develop, maintain, and invest in meaningful relationships with local NHPI grassroots organizations that use data to address racial inequities.
- Modernize local data infrastructure and align data collection and reporting tools with state and national standards.
- Support data systems workforce diversity programs.

Academic Research Institutions	❖ Implement relevant community-centered principles when conducting NHPI related research. ❖ Integrate NHPI lived experiences and community expertise in informing research and include NHPI voices in decision-making processes of how data should be collected, analyzed, and shared publicly. ❖ Partner and share resources with NHPI community-based organizations that assist with research projects to increase survey response and program participation rates. ❖ Provide fair and timely compensation for services and materials developed by NHPI cultural and linguistic experts.
Non-Profit Organizations	❖ Develop formal relationships with NHPI community-based organizations and advocates to seek their input and engagement involving data systems relevant to NHPI communities. ❖ Support campaigns that promote NHPI community participation in responsible data collection efforts such as U.S. Census Bureau surveys. ❖ Advocate for use of OMB Dir. 15 minimum racial and ethnic categories in solidarity with NHPI communities when noncompliance is observed. ❖ Utilize OMB Dir. 15 in the organization’s own data collection tools and data reporting. .
Philanthropy	❖ Support efforts to research, identify, and address significant barriers to adopting disaggregated racial and ethnic data categories by government agencies and private actors. ❖ Invest in community-led efforts that advocate for policies to improve data equity for NHPIs. ❖ Invest in data systems workforce development for NHPIs by providing funding to support participation in fields such as data science, research, public health, and public policy. .

Methodology

We developed an outreach plan that included more than 200 Native Hawaiian and Pacific Islander (NHPI) leaders from across the country, most of whom were connected to an NHPI community-serving organization. To ensure that the diversity of the NHPI community was represented, the list accounted for representations of NHPI subgroup, state of residence, area of expertise, ability, gender identity, sexual orientation, and generation. Some participants were recommended by other leaders, which expanded our reach beyond our direct network. A consent form, interview, and focus group guides were developed. All materials were submitted and approved by UCLA Institutional Review Board.

The implementation of the project was divided into three phases, with the first two phases discussing key questions and the third focused on developing recommendations. Phase 1 interviews and focus groups were conducted based on regional groupings for convenience of scheduling across time zones and organizational proximity and familiarity with one another. The key question What are the priority issues in your community? was discussed across 37 focus groups and 6 interviews. Recordings were transcribed and analyzed to identify key themes. The themes determined the Priority Areas of Need, which participants self-selected into. Phase 1 results also identified a need for discussions focused on the specific populations within the NHPI communities that are often overlooked and require prioritization. Altogether, 13 focus groups were conducted exploring the question What are your data needs in this issue area? Transcripts of the focus groups were analyzed, and key themes were identified and used to develop data policy recommendations presented in this document. In Phase 3, Data Policy Lab members drafted policy recommendations for 9 Priority Areas of Need and 3 Specific Population Considerations and shared with all community leader participants for feedback. Data was identified as the tenth Priority Area of Need, which was given its own focus group in Phase 2 and input informed the overall content. Three rounds of community feedback were collected in Phase 3.

We sent invitation emails to a list of community leaders, organizations, and institutions compiled from the NHPI Data Policy Lab's data request database, along with those currently involved in COVID-19 efforts for NHPIs. This list ensured representation of at least 9 NHPI subgroups, e.g., nationwide, focusing on states with high proportions of NHPI residents.

We engaged 138 NHPI community leaders from 13 states and the District of Columbia, ages 18 to 93 and representing 9 NHPI subgroups—CHamorro, Chuukese, Fijian, Marshallese, Native Hawaiian, Palauan, Pohnpeian, Samoan, and Tongan. Each focus group took 1.5 hours and additional 1 hour-long interviews were conducted with leaders from states that did not have NHPI-serving organizations. Phase 1 took 4 months, Phase 2 took 1 month, and Phase 3 took 6 months with additional months in between for data analysis and planning.

NHPI Data Policy Lab members as well as data and policy experts contributed to writing, reviewing, and finalizing the Platform. Ultimately, this has been possible only because of the contributions of NHPI community leaders, who are committed to data equity for NHPI communities.

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