

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

3 **Policy Date:** October 29, 2024

4 **Policy Number:** 20244

5 Abstract

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

22

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

24

25 Relationship to Existing APHA Policy Statements

- 26 ● APHA Policy Statement 20227: A Strategy to Address Systemic Racism and Violence as Public
27 Health Priorities: Training and Supporting Community Health Workers to Advance Equity and
28 Violence Prevention
- 29 ● APHA Policy Statement 20218: Call for Urgent Actions to Address Health Inequities in the U.S.
30 Coronavirus Disease 2019 Pandemic and Response
- 31 ● APHA Policy Statement 202116: Ensuring Equity in Transportation and Land Use Decisions to
32 Promote Health and Well-Being in Metropolitan Areas
- 33 ● APHA Policy Statement LB20-04: Structural Racism is a Public Health Crisis: Impact on the
34 Black Community

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- 35 ● APHA Policy Statement 20189: Achieving Health Equity in the United States
- 36 ● APHA Policy Statement 200311: Opposition to Eliminating or Compromising the Collection of
- 37 Racial and Ethnic Data by State and Local Public Institutions
- 38 ● APHA Policy Statement 20017: Research and Intervention on Racism as a Fundamental Cause of
- 39 Ethnic Disparities in Health
- 40 ● APHA Policy Statement 20005: Effective Interventions for Reducing Racial and Ethnic
- 41 Disparities in Health

42 Problem Statement

43 The primary focus of the field of public health is to promote health and prevent disease. To mitigate
44 health disparities, a particular type of health difference linked with social, economic, and/or
45 environmental disadvantage, public health data sets must have comprehensive and consistent information
46 related to race and ethnicity.[1] Health disparities in the United States are largely the result of cumulative
47 disadvantages people with minoritized racial and ethnic identities experience as a result of structural
48 racism.[2] It is well understood in the field of public health that chronic disease morbidity and mortality
49 rates vary by race and ethnicity; even when the incidence of disease is lower, the prognosis is worse for
50 certain subpopulations.[3] This is largely due to social and political determinants of health that are
51 mediated by structural racism, the macro-level factors that restrict the opportunities, resources, power,
52 and overall well-being of individuals, communities, and entire populations as a result of their race and/or
53 ethnicity.[4–6]

54
55 In the United States, public institutions collect racial and ethnic data to better understand the
56 demographics of the nation; the United States remains one of the few wealthy countries to prioritize this
57 practice. Globally, there are not consistent practices for collecting racial and ethnic data because of
58 reasons such as legality, different social constructs for race and ethnicity, and regional differences in the
59 composition of the population.[7] Context-specific comprehensive data sets allow for a more refined
60 assessment of the public health effects of structural racism.[4–6] For example, structural factors such as
61 residential segregation and redlining have been associated with racial disparities in health related to
62 adverse birth outcomes, asthma, diabetes, and food insecurity.[8] While the concepts of race and ethnicity
63 are not unique to the United States, how the country collects data on a concept socially constructed and
64 operationalized domestically has to be right-sized to serve the public health needs of our nation.
65 Currently, White Americans constitute nearly 60% of the population.[9] However, projection tables
66 released by the U.S. Census Bureau in 2023 indicate that, by 2050, individuals with minoritized racial
67 and/or ethnic identities will represent the largest share of the population.[9] The absence of

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68 comprehensive racial and ethnic data hinders the field of public health from adequately addressing
69 chronic and worsening racial disparities in health.[10]

70

71 As our nation’s diversity increases, public health data collection practices must be dynamic to capture the
72 changing demographics of our nation and ensure that disparities are not masked by larger racial and/or
73 ethnic groupings. The Office of Management and Budget (OMB) initially created Statistical Policy
74 Directive No. 15 (SPD 15): Standards for Maintaining, Collecting, and Presenting Federal Data on Race
75 and Ethnicity in 1977 to ensure consistent data on race and ethnicity across the federal government by
76 establishing minimum reporting categories.[11] Since 1977, SPD 15 has been revised to include a
77 separate ethnicity question (in 1997), to allow the selection of multiple categories (in 2000), and to adjust
78 language, include the Middle Eastern or North African category, and combine the questions for race and
79 ethnicity (in 2024).[11]

80

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

88

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

96

97 Evidence-Based Strategies to Address the Problem

98 There are several strategies that can improve the collection of race and ethnicity data.

99

100 Establish public health racial and ethnic data collection standards: The most immediate opportunity
101 resides in establishing consistent public health data collection standards. Although the recently updated

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

113
114 Aside from these two significant updates, language adjustments in the OMB revision will likely do little
115 to improve data collection for the groups most at risk for racial disparities in health. For example, the
116 revised proposal makes a recommendation to remove Negro from the expanded description of the Black
117 or African American racial category but does not provide additional recommendations on how to better
118 capture the diversity of this racial group beyond that change.[11] Within the context of public health,
119 Black Americans who are descendants of chattel slavery have poorer health outcomes than Black
120 immigrants or their descendants.[19] In an examination of cardiovascular disease risk factors among
121 Black immigrants and African Americans, the American Heart Association asserted that data on the Black
122 population in the United States should be, at minimum, disaggregated by ethnicity and country of origin
123 to inform public health strategies to reduce health disparities.[20]

124
125 There are also stark intragroup differences within the Asian American population that will continue to be
126 masked if more granular public health data collection methods are not deployed. The Asian American
127 population currently represents dozens of ethnic groups with major wealth, education, and health gaps by
128 region and country of origin.[21] A New York City examination of the health burden of COVID-19
129 revealed that Chinese Americans had the highest mortality of all racial and ethnic groups assessed and
130 that South Asians had the highest infection rate within the Asian American population.[22] Had more
131 granular data collection practices been deployed earlier in the pandemic, these disparities across
132 subgroups may have been mitigated by more tailored messaging and interventions.

133
134 There are numerous public health data issues when it comes to Indigenous communities, including poor
135 data quality due to aggregation, a lack of clarity regarding definitions of who is American Indian or

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136 Alaska Native, exclusion from data collection altogether, and confusion about the political status held by
137 citizens of tribal nations separate from race or ethnicity.[23,24] Described by Native American
138 communities as “data genocide,” the elimination, erasure, misclassification, and concealment of
139 populations from public health data perpetuate structural racism and impact progress toward health
140 equity.[25] Data genocide has also been named as a threat to health equity for people currently
141 categorized under the Native Hawaiian or Pacific Islander group. On the island of Hawaii, there are data
142 collection challenges with respect to aggregating Native Hawaiians and Pacific Islanders. In a 2021
143 survey, 71% of Native Hawaiians identified with at least one other race, rendering more than half of the
144 Native Hawaiian population invisible when single multiracial categories were used.[26] Furthermore, an
145 examination showed that any health disparities that are present between Pacific Islanders and Native
146 Hawaiians are masked when their groups are combined.[26]

147
148 Collecting data for public health planning, programming, and prevention efforts requires more nuanced
149 efforts than what is currently mandated by the OMB. In addition, according to a report on data
150 completeness and standards conducted by Grantmakers in Health and the National Committee for Quality
151 Assurance, only four of the 10 programs reviewed used the same standards.[27] The standards most
152 commonly used for collecting race and ethnicity data are the OMB standards; even more discouraging,
153 only four programs provided complete race and ethnicity data, with two of those programs using OMB’s
154 standards.[27] As such, an evidence-based strategy to improve the public health collection of race and
155 ethnicity data must focus on improving the completeness of racial and ethnic data collection practices and
156 establishing standards for consistency beyond the existing minimum standards.

157
158 The Council for State and Territorial Epidemiologists recently released recommendations for addressing
159 racial/ethnic COVID-19 data gaps that can be extended to public health data at large.[28] These
160 recommendations include (1) mitigating patient hesitancy in providing data; (2) encouraging providers to
161 collect data; (3) improving information system capacity to collect, manage, process, and transmit data;
162 and (4) improving public health agency resources and staffing.[28] Prior to the release of these
163 recommendations, localities had demonstrated success in improving the completeness of this information.
164 During the COVID-19 pandemic, the New York City health department made meaningful improvements
165 with respect to inclusion of racial/ethnic information in health data.[29] Although unable to ensure that
166 providers adhered to the standards in the way they collected data, this approach did demonstrate the
167 feasibility of health systems improving the completeness of their data using existing data infrastructure,
168 even in emergency conditions.[29] In addition, New York City publicly reported the percentage of
169 missing racial/ethnic data on their online COVID data portal, providing the general public with

170 information on how the data are used. Ensuring that people understand how and why their data are being
171 used and providing the data back to them are critical steps in earning the trust required for people to
172 provide data.

173
174 Prioritize self-reported data as the gold standard and improve completion of racial and/or ethnic data sets:
175 To improve the completeness of race and ethnicity data in federal health programs, self-reported data
176 must be prioritized in data collection practices. While administrative reporting has been used to create
177 efficiency in data collection, reliance on this type of reporting as opposed to self-reporting has had
178 inconsistent validity across racial groups with dangerous implications in terms of racial disparities in
179 health.[30] For example, a 2020 examination revealed that Medicare administrative data sources such as
180 observational data models and causal modeling methods had high validity for the African
181 American/Black population and low validity for the Indigenous population.[30] Given the changing
182 demographics of our nation, such as a 276% increase in the size of the multiracial population since 2010,
183 prioritizing self-reported data is the most accurate approach to collecting racial and ethnic data.[31] In
184 addition, misclassification of race and ethnicity can mischaracterize the burden of health disparities. One
185 examination showed that the number of Asian American and Pacific Islanders with dementia and diabetes
186 was underestimated, while there was overattribution in the Latine population when race variables rather
187 than self-reported data were used.[30] Failure to use self-reported data can affect the precision of resource
188 allocations and public health programming designed to reduce racial disparities in health.

189
190 As a social construct, racial and ethnic identity is a complicated domain. For example, the minimum
191 national standards for racial/ethnic data collection include combinations of race, ethnicity, national origin,
192 sociopolitical identity, and more. Because of this fluctuating social construction, individuals have the
193 potential to change the way they disclose their racial/ethnic identity over time, which can depend on the
194 way the data are collected, the entity collecting the data, and the way the individuals providing
195 information are perceived.[32] In situations in which individuals are able to provide more detailed racial
196 and ethnic data, the data are often aggregated by the data collector in ways that mask health inequities or
197 in ways that are incompatible with communities themselves.[33] As technology advances, there are ample
198 opportunities for data scientists to leverage newly developed data management efficiencies to reduce the
199 reliance on collecting aggregated data at the individual level. For example, by providing an option for
200 individuals to self-identify in an open-answer question, data scientists can process the information on the
201 back end to allow numerous ways to categorize it.[34]

202

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203 To prioritize self-reported data, public health institutions must move from passive to more active
204 approaches, including establishing data collection completeness targets (e.g., improving racial and ethnic
205 data completeness to 90%), creating organizational policies around data collection, and equipping data
206 collectors with the necessary training and scripts to reduce hesitancy. The American Hospital Association
207 has developed a toolkit for eliminating health care disparities; in this toolkit, a response matrix is
208 provided that offers a script for data collectors that is culturally competent and respectful.[35] The
209 American Medical Association also encourages the use of scripts and procedures that empower patients
210 by telling them how the information will be used and why it is meaningful to ensure that they receive the
211 best care available.[36]

212
213 Use participatory action research (PAR) to adapt to and maintain dynamic definitions of race and
214 ethnicity: While federal definitions and standards for the collection of data on race and ethnicity may
215 remain unchanged for decades, this does not necessarily align with the way people experience and self-
216 define their racial/ethnic group membership or the way our nation’s racial and ethnic composition
217 evolves. Race, as a social construct, is nuanced and dynamic; languages and experiences will differ across
218 generations and geographies and within groups. To ensure cultural sensitivity and validity, public health
219 racial and ethnic data collectors should review existing instruments.[37] Although the established
220 minimum standards set by the OMB are a good baseline to build from, there are additional approaches
221 that are more adaptable to the dynamic definitions of race and ethnicity.

222
223 PAR is a partnership approach to research that involves community members, organizational
224 representatives, and researchers in all aspects of the research process, including leadership and decision
225 making.[38,39] All partners contribute their expertise and share responsibilities and ownership of projects
226 designed to enhance understanding of a topic as well as integrate the knowledge gained with action to
227 improve the health and well-being of community members. PAR is a highly feasible and powerful
228 approach that leverages a variety of modalities, such as quantitative research, photovoice, and
229 storytelling, that can contribute to filling gaps in public health knowledge, direct the focus of research to
230 community priorities, identify barriers communities face that impact their ability to achieve wellness,
231 bring forward community-specific solutions to ongoing health challenges, and offer benefits to the
232 participants themselves.[38,40–42]

233
234 Data scientists, researchers, and public health practitioners can leverage PAR to investigate community-
235 relevant research questions, develop community-meaningful racial/ethnic subgroups, and more. If open-
236 answer data collection is unfeasible, PAR can be used to create the data collection instrument and a

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237 racial/ethnic data collection tool that is acceptable to the community. Creating a more inclusive data
238 collection approach can improve future opportunities to compare data over time as social constructs
239 change and particularly as multiracial/ethnic communities grow.

240
241 Train public health researchers and practitioners to responsibly and respectfully collect racial and ethnic
242 data: Race and ethnicity data should be collected while accommodating any concerns of communities
243 who are participating. Many communities have historically been harmed or severely mistreated by health
244 researchers.[43] As a result, these communities may mistrust health researchers or public health
245 practitioners and require accommodations for the management and storage of their data. In 2019, the
246 National Institutes of Health (NIH) held a national tribal consultation on the NIH draft Data Management
247 and Sharing Policy.[44] One important theme that emerged was the responsibility of NIH to train
248 researchers it supports in the appropriate management and sharing of American Indian/Alaska Native
249 health data.[44] This strategy involves strengthening transparency and accountability by making data
250 management and sharing plans publicly available and accessible.[44] Using data in a responsible manner
251 is critical given that the cause of racial disparities in health is structural racism and not an individual's
252 actual race and/or ethnicity.

253
254 In a 2021 equity report released by Blue Cross Blue Shield, it was recommended that all staff who collect
255 data on race and ethnicity be trained on how to ask people for their personal information.[45] Training for
256 staff who collect this information will need to be tailored to organizational policies and goals around race
257 and ethnicity data collection but should center cultural humility, respect, and accuracy in the
258 approach.[45] Centering cultural humility, the practice of improving rapport through respect and
259 curiosity, can establish trust and improve the accuracy of data collection.[45] Although maintaining
260 ongoing training involves additional organizational resources, improving the accuracy of public health
261 data sets yields a greater return as institutions will be able to better scale their projects for maximum
262 impact in reducing racial disparities in health.

263
264 Prioritize additional research inquiries into best practices for collecting racial and ethnic data on foreign-
265 born, child and adolescent, and disenfranchised populations: The strategies outlined up to this point are
266 broad and intended to be applicable across a range of public health settings. However, there are special
267 considerations for populations with circumstances that may affect data collection. According to the
268 Bureau of Labor Statistics, foreign-born workers accounted for 18.6% of the U.S. civilian labor force in
269 2023.[46] These workers are more likely than native-born workers to be employed in service occupations
270 and less likely to have completed high school; also, they earn lower wages.[46] Given the growing

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271 number of foreign-born U.S. residents, additional research on how best to capture racial and ethnic data
 272 on this population is needed beyond the existing OMB categories. Currently, we know broadly that nearly
 273 one half of the foreign-born workforce is Latine and that one quarter is Asian; however, more granularity
 274 would greatly improve public health’s ability to respond to and promote health in this population.[46]
 275 When collecting these data for public health programming, inquiring about country of origin in
 276 combination with open-ended questions can enhance the accuracy of data on this population.

277
 278 Another area in need of additional research is collection of racial and ethnic data within populations of
 279 children and adolescents. Currently, standard practice for collecting these data in public health settings
 280 largely involves caregivers providing this information on behalf of their children. However, how
 281 caregivers view the racial and ethnic identity of children may be misaligned with how the child or
 282 adolescent identifies. The growing number of transracial adoptees and multiracial/multiethnic individuals
 283 in the United States, particularly among younger generations, supports the need for additional research
 284 into best practices for collecting racial and ethnic data among these populations.[47]

285
 286 Lastly, there are additional groups of people who may be disenfranchised due to various social and
 287 economic inequities associated with their group membership. This includes but is not exclusive to people
 288 who are experiencing homelessness or are receiving inpatient services for various conditions. Self-
 289 identification should still be prioritized, but additional research to identify safeguards and approaches that
 290 cause the least amount of harm is needed.

291
 292 Action Steps to Implement Evidence-Based Strategies
 293

	Evidence-Based Strategy		Action Steps
1	Prioritize self-reported data and improve completion of racial/ethnic data sets.	1a	Health-determining systems and entities, including health departments, should require providers and public health more broadly to collect the data and include data completion reports and targets in quality assurance reviews.
		1b	Health-determining systems and entities, including health departments, should improve information system capacity to collect, manage, process, and transmit data at different levels, such as expanded categories and open-answer fields.
		1c	Federal, state, tribal, and local governments should improve public health agency resources and staffing.

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2	Use participatory action research to adapt to and maintain dynamic definitions of race and ethnicity.	2a	Health-determining systems and entities, including health departments, should integrate community expertise through multiple modalities to improve inclusive design, collection, analysis, and reporting of racial/ethnic data.
		2b	Through community leadership models, health-determining systems and entities, including health departments, should establish relationships to ensure continuous and ongoing improvement in efforts as social constructs and community dynamics evolve over time.
3	Train public health researchers and practitioners to responsibly and respectfully collect racial and ethnic data.	3a	Academic institutions, funding agencies, health care systems, local health departments, nongovernmental organizations, professional associations, state health departments, the U.S. Department of Health and Human Services, and other health-determining entities should require the implementation of cultural sensitivity and humility training, create scripts, and provide ongoing education for all race and ethnicity data collectors.
		3b	Health-determining systems and entities should make organizational data management and sharing plans publicly available to increase trust of and support for data collectors.
4	Prioritize additional research inquiries into best practices for collecting racial and ethnic data on immigrant, child and adolescent, and disenfranchised populations.	4a	Model organizational policies for how to collect racial and ethnic data on immigrant, child and adolescent, and disenfranchised populations should be established and/or reviewed as the evidence base is being built.
		4b	Health-determining systems and entities should prioritize self-reported data in immigrant, child and adolescent, and disenfranchised populations over existing administrative data to improve accuracy and support respondents' agency to self-identify.

294

295 Opposing Arguments/Evidence

296 This policy statement has highlighted the benefits of collecting disaggregated racial and ethnic data.

297 However, there are several concerns and issues that have to be considered.

298

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

304

305 Patient privacy and confidentiality challenges: When discussing privacy and confidentiality concerns,
306 patients and consumers may view collecting information about an individual's race and ethnicity as
307 intrusive and a potential invasion of privacy for various reasons. In addition, disaggregation of race and
308 ethnicity data can increase the risk of "reidentification" for some groups when this information is made
309 publicly available.[49] Reidentification refers to the ability to use data from a deidentified data set to
310 identify individuals, and it is one of the biggest risks associated with disseminating disaggregated data on
311 race and ethnicity. The risk of reidentification varies from one state or locality to another due to
312 demographic differences because race and ethnicity can be "quasi-identifiers." [49] A strategy to combat
313 this challenge is to selectively suppress race and ethnicity data in areas where there are too few
314 individuals and privacy concerns are present.[49] As such, suppression guidelines and criteria should be a
315 part of state, local, and/or institutional racial and ethnic data collection plans. Some states already have
316 more broad privacy protections relating to public dissemination of data; California, Nebraska, New York,
317 Tennessee, and Texas all have laws in place to protect privacy and/or explicitly reduce the risk of
318 reidentification.[50] While reidentification is a valid risk that public health data collectors should be
319 mindful of, the risk does not outweigh the benefit or utility of more detailed race and ethnicity data. There
320 are resources such as the Network for Public Health Law's Disaggregation of Public Health Data by Race
321 and Ethnicity: A Legal Handbook, which was created specifically to address the role of law in collecting
322 and disseminating these important data to reduce racial disparities in health.[50]

323

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

333

334 To do our part to support the mitigation of racial disparities in health, it is time for public health to lead at
335 the local, state, and institutional levels by providing more robust and complete data sets. With robust,
336 accurate, and complete data, we can better allocate resources to support populations on the journey to
337 dismantling long-standing barriers to health, equity, and justice.

338

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