## Evaluation of American Community Survey Data by Tribal Affiliation as a Potential Data Source for the American Indian Population and Labor Force Report

In February 2022, responsibility for preparing the biennial American Indian Population and Labor Force Report (AIPLFR) was transferred from the Employment and Training Administration (ETA) to the Bureau of Labor Statistics (BLS). Since responsibility for the report has been transferred, the BLS AIPLFR team has been working to ensure that the AIPLFR aligns with the BLS mission: to be the gold standard source for measuring labor market activity, working conditions, price changes, and productivity in the U.S. economy to support public and private decision making. Additionally, the BLS AIPLFR team has been consistently engaging with tribal stakeholders and tribal members to not only ensure the report satisfies the requirements of Public Law 115-93, but that it also accurately reflects the population and labor force outlook of tribes.

In alignment with the BLS mission, the primary task of the AIPLFR team in Fiscal Year 2024 was to evaluate updated American Community Survey (ACS) data by tribal affiliation as a potential data source for the report. Upon evaluation of the ACS Selected Population Tables (SPT) and American Indian and Alaska Native Tables (AIANT), two data products produced by the Census Bureau based on pooled ACS data over a 5-year time frame, the BLS AIPLFR team has determined that these data do not meet the necessary requirements to be used as the primary data source for the AIPLFR. The reasons for this determination are discussed below.

The SPT and AIANT provide detailed social, economic, and housing data for race, Hispanic origin, tribal, and ancestry populations. However, when examining the 2017-21 5-year ACS estimates, the BLS AIPLFR team found that detailed population and labor force data by tribal affiliation are only available for 343 Census-designated "American Indian and Alaska Native Tribal Groupings." The Department of the Interior (DOI) identifies 574 Native American tribes as federally recognized tribes. Due to factors such as large

margins of error, estimates of zero, or the absence of numerical estimates, a significant number of tribal groupings lacked sufficient population and labor force data. As a result, the estimates of these tribal groupings, which are pertinent to producing a comprehensive and accurate AIPLFR, are excluded from the specially tabulated data tables.

Additionally, of the 343 Census-designated "American Indian and Alaska Native Tribal Groupings" that detailed population and labor force data were available for, only 261 of those groupings were federally recognized tribes. (See <a href="table 1">table 1</a>.) The ACS data tables include information on tribes that are recognized by state governments, but not the federal government; regional corporations, nonprofit organizations, and Alaska Native corporations; component bands that are part of federally recognized tribes; and Indigenous people/ethnic groups. Because the Census-designated groupings include people/ethnic groups, it is unclear for a number of groupings if they refer to a people or tribe. (For example, the Census-designated tribal grouping "Kickapoo" could refer to the Kickapoo people, the Kickapoo Traditional Tribe of Texas, or the Kickapoo Tribe of Oklahoma.)

The BLS team also assessed the suitability of population and labor force data of American Indians and Alaska Natives alone or in combination with other races (AIANs AOIC) by geographic region. The team found that detailed population and labor force data for AIANs AIOC are available for 381 "American Indian Areas/Alaska Native Areas" within the United States; the Census Bureau's 2017-21 5-year ACS SPT and AIANT identify 432 tribal areas. (See <u>table 2</u>.) Similar to the tribal affiliation data, a significant number of tribal lands were excluded from the extracted datasets due to factors such as large margins of error, estimates of zero, or the absence of numerical estimates.

Further, the ACS collects information on those who self-identify as AIAN and AIAN alone or in combination with another race (AIAN AOIC), as well as their self-reported tribal affiliations. However, information is unavailable in the ACS on whether an individual is an enrolled member of a federally recognized tribe or

if they are eligible for or are receiving DOI services. Under Public Law 115-93, the AIPLFR must include information on the total population eligible for DOI services. The ACS also lacks data on key elements required for the report. For example, the law calls for data on the population available for work, including those not actively seeking work because they feel no employment opportunities are available in their area. The ACS does not currently collect data on this population subset. Additionally, Public Law 115-93 requires a biennial report on the DOI service population. However, the ACS SPT and AIANT are only available on a 5-year, non-overlapping basis. If the 5-year data were to be used, issues of accuracy and timeliness would arise, especially when evaluating population and labor force data of smaller tribes.

A critical component of Public Law 115-93 is to consult with Native American tribes regarding the AIPLFR. Although not directly related to the BLS team's evaluation of ACS data, tribal stakeholders and leaders have been adamant about not using ACS data as the primary data source for the AIPLFR and instead prefer the use of tribally collected data. The BLS AIPLFR team is currently operating in a limited resource environment and must utilize the data sources at its disposal that are able to satisfy the federal mandate as best as possible. However, it is important to acknowledge the extensively documented requests of tribal leaders and stakeholders regarding data sources.