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BEYOND THE BASELINE:

Federal Revisions, State Constraints, and Austin's Data Collection Landscape

EVERY TEXAN

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Executive Summary

Disaggregated race and ethnicity data are essential for understanding how public policy affects different communities and designing effective responses. When data are reported only in broad categories, disparate outcomes in health, education, and economic well-being between groups disappear, and so does accountability for the policies that produced them.

Across the country, state-level landscape analyses have demonstrated that detailed demographic data collection can support more equitable decision-making. Yet no comparable city-level assessment exists. Austin, Texas is home to a rapidly diversifying population and a complex ecosystem of data collectors including city departments, a regional transit authority, the city's largest school district, and a city-owned electric utility, each operating with different standards, tools, and definitions. The result is a patchwork in which the same residents may be counted differently depending on which institution is asking. Consequently, a single resident can be represented in one dataset but absent in another.

This report documents a first-of-its-kind assessment of race and ethnicity data collection practices at the city level in Austin. This assessment is not comprehensive; it reflects the practices of selected entities as of 2026. Drawing on publicly available documentation, interviews with city personnel and institutional leaders, and landscape research, we find:

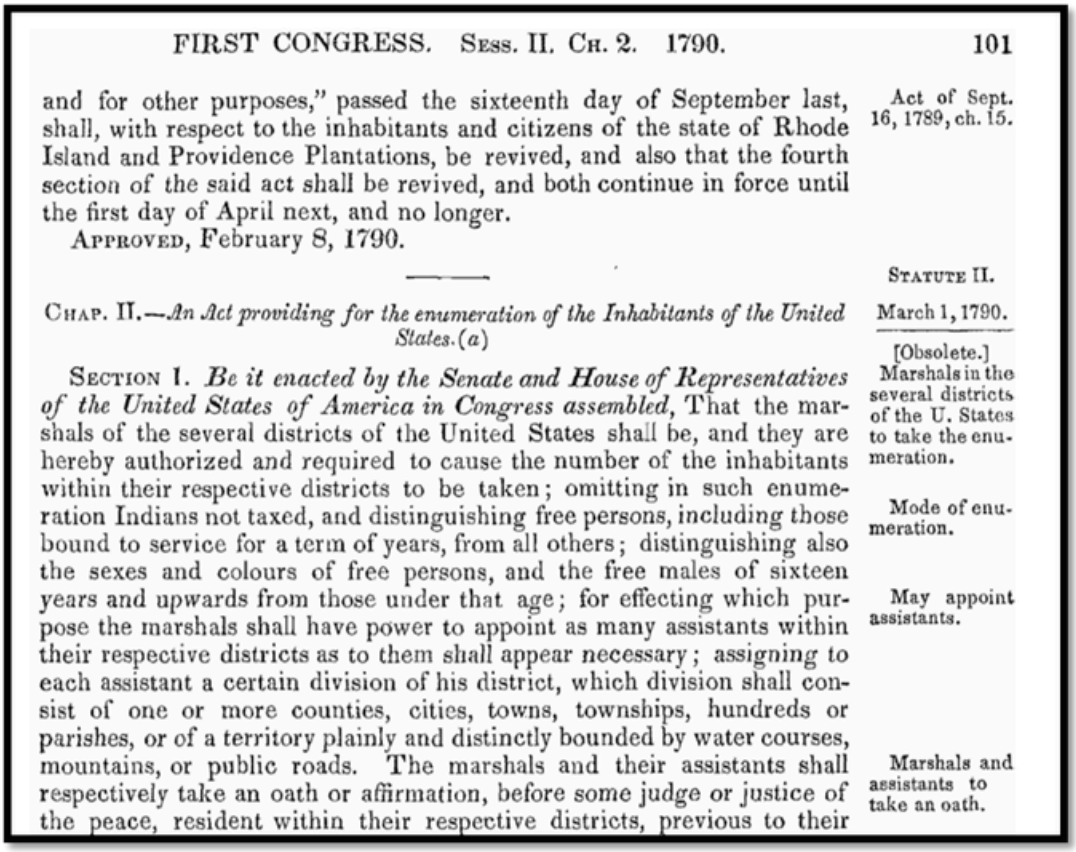
- **Austin has the commitment, but not the directive.** The City's strategic plans commit to equity and, in places, to segment data by race and ethnicity, but no citywide directive tells departments how.
- **Data collection is fragmented.** Different survey tools, question wording, and category schemes create differences that reflect instrument design and not the populations themselves.
- **Local models show what is possible.** The City Demographer's data collection guide and the Quality of Life studies[1] demonstrate standardized, community-centered data collection. Austin Energy's equity framework and its planned use of a local index show departments turning to local data when federal tools fall short.
- **Federal standards are an unstable foundation.** SPD 15 implementation has been delayed, Title VI disparate-impact protections are being withdrawn, and new federal privacy rules have postponed and may coarsen Census data.
- **Cities cannot do this work alone.** Austin entities can set standards for their own departments and organizations, but not for the state agencies and school districts that collect much of its residents' data. Without a state standard, local progress stays partial.
- **Standards alone will not produce equity.** Residents must trust that sharing their race or ethnicity is safe. This means that it is the job of data collectors to build trust with their communities.

1 The City of Austin's Quality of Life studies are community-specific assessments conducted through the City's identity-based Quality of Life advisory commissions. These commissions are appointed by the Austin City Council and established under the City Code to advise the Council on issues affecting specific communities.

Introduction

History of Data Disaggregation

The act of disaggregating data is a process by which broad statistics are broken down into subgroups or dimensions to reveal nuances in datasets that aggregated summaries hide. Common subgroup dimensions include race, ethnicity, age, and sex. Disaggregated data is not a new concept. It dates back to the Census Act of 1790 when U.S. marshals were instructed to categorize people into five demographic groups during the constitutionally mandated enumeration process.[i] The five counted groups—free White males 16 years and older, free White males under 16 years, free White females, all other free persons, and enslaved people—were exclusionary and left out many identities. While early uses of disaggregated data were primarily utilized for political purposes such as congressional apportionment, census data would eventually become a vital tool for understanding the impact of public policy on the population.[ii]



FIRST CONGRESS. Sess. II. Ch. 2. 1790. 101

and for other purposes," passed the sixteenth day of September last, shall, with respect to the inhabitants and citizens of the state of Rhode Island and Providence Plantations, be revived, and also that the fourth section of the said act shall be revived, and both continue in force until the first day of April next, and no longer.

Approved, February 8, 1790.

Act of Sept. 16, 1789, ch. 15.

Statute II.

March 1, 1790.

Chap. II.—*An Act providing for the enumeration of the Inhabitants of the United States.(a)*

[Obsolete.]

Section 1. *Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled*, That the marshals of the several districts of the United States shall be, and they are hereby authorized and required to cause the number of the inhabitants within their respective districts to be taken; omitting in such enumeration Indians not taxed, and distinguishing free persons, including those bound to service for a term of years, from all others; distinguishing also the sexes and colours of free persons, and the free males of sixteen years and upwards from those under that age; for effecting which purpose the marshals shall have power to appoint as many assistants within their respective districts as to them shall appear necessary; assigning to each assistant a certain division of his district, which division shall consist of one or more counties, cities, towns, townships, hundreds or parishes, or of a territory plainly and distinctly bounded by water courses, mountains, or public roads. The marshals and their assistants shall respectively take an oath or affirmation, before some judge or justice of the peace, resident within their respective districts, previous to their

Marshals in the several districts of the U. States to take the enumeration.

Mode of enumeration.

May appoint assistants.

Marshals and assistants to take an oath.

Figure 1. Excerpt from the Census Act of 1790 directing U.S. marshals and their assistants to divide their districts and take an oath before conducting the enumeration. Source: U.S. Census Bureau, "Legislation, 1789–1820," History: 1790 Census.

Schedule of the whole Number of Persons within the Division allotted to A. B.

Names of heads of families.	Free white males of sixteen years and upwards, including heads of families.	Free white males under sixteen years.	Free white females, including heads of families.	All other free persons.	Slaves.

Figure 2. The 1790 enumeration schedule, which recorded the head of each household and sorted residents into five categories. Source: U.S. Census Bureau, "Legislation, 1789–1820," History: 1790 Census.

Over time, the Census has changed and expanded how race and ethnicity are collected and disaggregated. These changes primarily reflect how the federal government defined and measured population groups. Early censuses used a limited number of racial categories, with terminology and classifications changing over time. Beginning in the mid-19th century, additional categories were introduced for American Indian and Alaska Native and Asian populations. The 1960 Census marked an important change in race and ethnicity data collection when respondents were first allowed to select their own race through self-enumeration. The history of how the Census has collected race and ethnicity data demonstrates that these classifications are not fixed measures, but change over time in response to policy priorities, changing populations, and evolved approaches to measuring racial and ethnic identities.

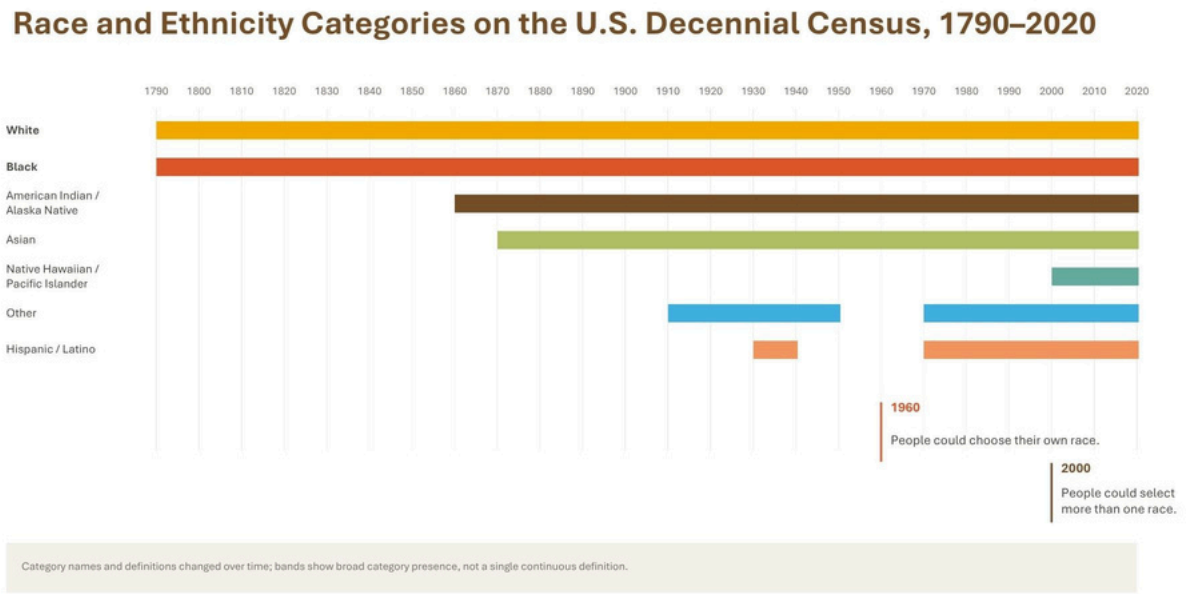


Figure 3: Race and ethnicity categories used on the U.S. decennial census, 1790–2020. Adapted from Pew Research Center, "What Census Calls Us," February 6, 2020.

Why Disaggregated Data Matters

Today, disaggregated data serves as a barometer of inequity in access and outcomes. Without disaggregated data, we cannot measure the true impact of public policies. Disaggregated data brings to light a reality of American life: that each of us experiences the impacts of policy decisions distinctly, with some benefitting more than others.

For example, census data tells us that 34% of Texans age 25 and older have earned a Bachelor's degree or higher.[iii] Disaggregating that data further shows us that Asian and non-Hispanic White Texans have the highest rates of post-secondary educational attainment, while Hispanic Texans and Texans identifying as another race have the lowest rates.[iv] Without disaggregation, we miss the opportunity to better understand how access, affordability, and other factors might be hindering some groups from completing a degree.

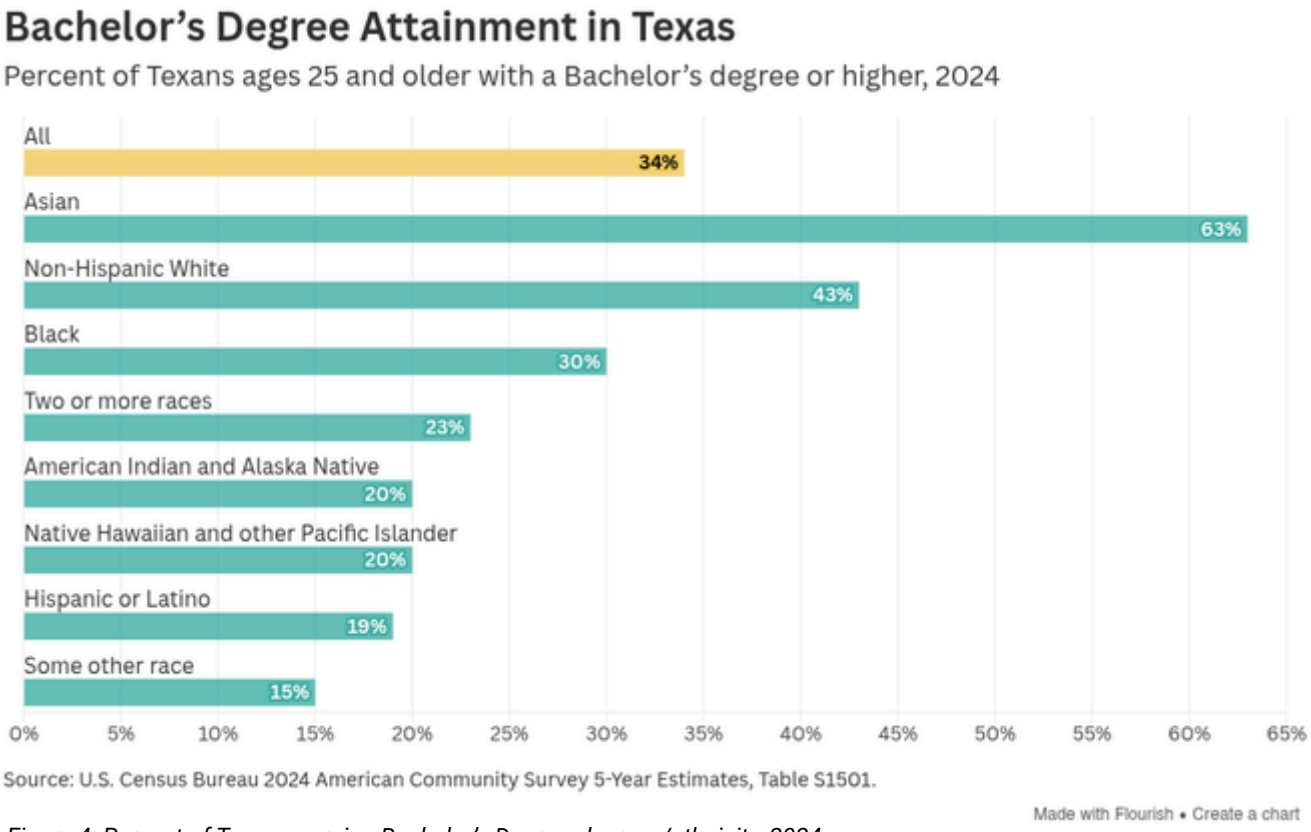


Figure 4: Percent of Texans earning Bachelor's Degrees by race/ethnicity, 2024.

Similarly, data from the Behavioral Risk Factor Surveillance System tells us that in 2023-2024, 18% of Texans (18 years and older) needed to see a doctor, but did not because of costs.[v] When we disaggregate the data by race and ethnicity, we learn that American Indian and Alaska Native Texans were the most likely to go without care because of cost (26%), followed by Hispanic Texans (24%). [vi]

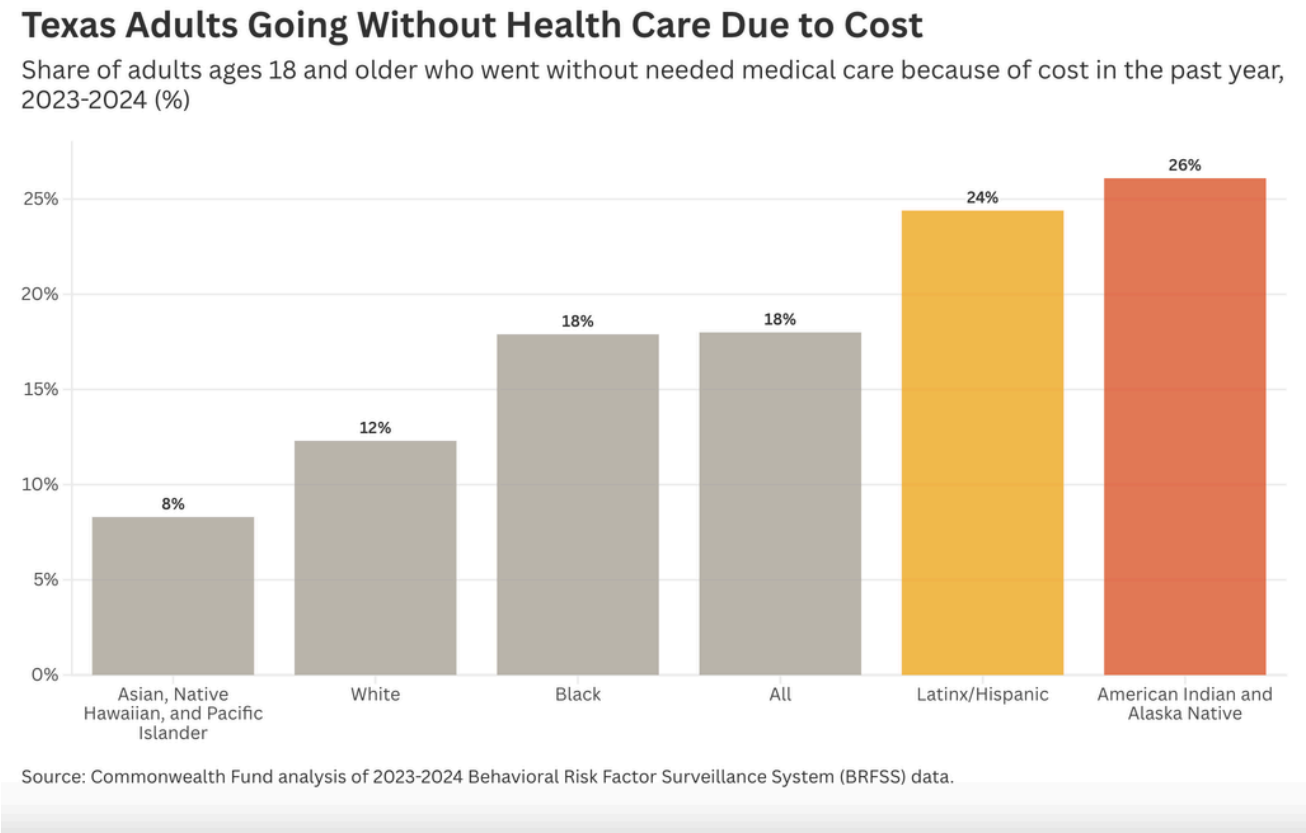


Figure 5. Texas adults going without needed health care due to cost, by race and ethnicity, 2023–2024.

In short, disaggregated data uncovers differences in outcomes across health, education, and other measures of well-being that reflect systemic inequities caused by policy decisions. These variable outcomes are not a reflection of inherent differences between groups of people themselves. Differences in outcomes are avoidable. If we can identify them as inequities, then we can design policies and practices to resolve them.

The Federal and State Baselines

The Federal Baseline: Statistical Policy Directive (SPD) Number 15

The first federal standards on race and ethnicity data were established by the Office of Management and Budget in 1977, prompted by federal responsibility to enforce civil rights laws.[vii] Since then, data standards have been revised twice (1997 and 2024).[viii] The most recent revision to Statistical Policy Directive (SPD) No.15 includes modifications intended to "maximize the quality of federal race/ethnicity data by ensuring that the format, language, and procedures for collecting data are consistent and based on rigorous evidence, which promotes comparability across federal government."[ix] These changes came about after years of scientific research, federal expert review and deliberation, and public participation. The Census Bureau outlines the main changes to the baseline standards:

- A single combined race and ethnicity question, with respondents encouraged to select all categories that apply
- Middle Eastern or North African (MENA) added as a new minimum category
- More detailed categories required beyond the minimum race and ethnicity categories for most situations
- Updated definitions, terminology, and guidance for collecting and presenting data[x]

SPD 15 established a federal floor, but its formal reach ends at federal agencies. For every other level of government, the standard travels indirectly through funding conditions, grant reporting requirements, and participation in federal data programs.

Recent delays in the implementation of SPD 15 have slowed the uniformity these new standards offer in the reporting of race and ethnicity. As of 2026, the Office of Management and Budget has announced extended timelines that push agency action plans to 2029.[xi]

Some states have chosen to go beyond the federal floor. As of May 2025, 13 states had passed laws requiring data disaggregation of race and ethnicity beyond federal standards.[xii] For example, Illinois became the first state in the nation requiring all state agencies collecting data on race and ethnicity to include a MENA classification.[xiii] The state of New York adopted a similar law in 2024 and had previously passed legislation requiring state agencies to disaggregate Asian American, Native Hawaiian, and Pacific Islander groups.[xiv]

Table 1. SPD 15 Implementation Timeline: Original and Extended Deadlines

Milestone / Requirement	Original Deadline	Extension Event	Current Final Deadline	Affected Entities
Agency Action Plans (Public roadmap for updates)	September 28, 2025	+6 Months (Sept 2025) +12 Months (March 2026)	March 28, 2027	CFO Act Agencies & EEOC
System Compliance (Forms, surveys, & collections)	March 28, 2029	+6 Months (Sept 2025)	September 28, 2029	All Federal Information Collections

Source: Compiled from Office of Management and Budget, "Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity," Federal Register 89, no. 62 (March 29, 2024): 22182–96; [September 2025 extension notice]; [March 2026 extension notice]. • Note: Original deadlines were set at 18 months (agency action plans) and five years (system compliance) from the directive's March 2024 issuance.

As of August 2026, the state of Texas is classified as having no data disaggregation laws in place, but the state does have relevant/related laws and advocacy activities in place.[xv] To understand how federal standards interact with Texas' state and local practices, we first turn to the highly decentralized reality of the state's data collection systems.

The Texas Baseline

There is no single, centralized statement, statute, or executive order from the Texas state government that universally dictates the exact race and ethnicity categories that all state agencies must collect. Data collection standards in Texas are thus highly decentralized. Instead of a single state authority dictating one uniform baseline, individual state agencies adopt the specific frameworks required by their unique federal funding streams, compliance laws, or oversight bodies.

The Texas Education Agency (TEA), for example, aligns its demographic data standards with the requirements of the United States Department of Education for state and federal accountability reporting, as well as for the Office for Civil Rights and the Equal Employment Opportunity Commission.[xvi] To meet these requirements, the TEA utilizes a mandatory two-part questionnaire.[xvii] Respondents must first identify their ethnicity as Hispanic/Latino or Not Hispanic/Latino, and then select one or more races from a legacy list: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Under this framework, individuals with origins in the Middle East or North Africa are explicitly aggregated into the White category. As a result, MENA students are invisible in TEA data, and their educational outcomes cannot be distinguished from those of other students classified as White. If a parent, guardian, or staff member declines to provide this information, the TEA requires local school observers to identify the individual.[xviii]

Other state agencies follow entirely different reporting structures dictated by their respective domains:

- **Texas Health and Human Services Commission (HHSC)**: When individuals apply for state assistance, the HHSC attempts to collect demographic data using a distinct, voluntary list of categories: American Indian or Alaskan Native, Asian or Pacific Islander, Black (not of Hispanic origin), Hispanic, and White (not of Hispanic origin). If an applicant declines to self-identify, the advisor on their application must attempt to determine the category, or the individual's race is documented as "unknown" in the system.[xix]

- **State Workforce Reporting**: Governed by Section 21.552 of the Texas Labor Code, state agencies and higher education institutions must produce an annual Equal Employment Opportunity (EEO) Report for the Texas Workforce Commission (TWC). This system tracks employee demographics and minority hiring practices using a highly consolidated set of categories: Caucasian Americans, African Americans, and Hispanic Americans.[xx]

Since Texas lacks a unified data architecture, this leaves the state's demographic baseline fragmented across varying legacy frameworks.

There have been legislative efforts to address this. House Bill (HB) 986 was introduced but did not pass during the 88th Texas Legislature in 2023. The bill would have required collection of demographic information for individuals who receive benefits under a health benefits program administered by HHSC or another health and human services agency using expanded race and ethnicity categories, including the establishment of a MENA category.[xxi] In 2025, HB 3564 was introduced during the 89th legislative session and would have required the TEA to collect and publicly report more highly detailed, disaggregated data.[xxii] For example, the bill would have required breaking down broad racial and ethnic groups, such as “Asian,” into more specific categories including Asian Indian, Chinese, Filipino, Korean, Pakistani, Vietnamese, and “other.” Black or African American subcategories would include African American, Ethiopian, Haitian, Jamaican, Nigerian, Somali, and “other.” The same breakdown would have been required for Hispanic or Latino, Native Hawaiian or Pacific Islander, and White categories. Additionally, the bill explicitly required the TEA to allow individuals to select more than one overarching race and ethnicity category, in addition to multiple subcategories.[xxiii] This change would have pushed the state agency standards beyond the baseline, making it possible to truly understand academic achievement, graduation rates, attendance rates, or access to educational resources for Texas’s students.

Given the lack of comprehensive statewide standards to collect and disaggregate data, cities like Austin are pioneering their own efforts to ensure decision makers have the most accurate and reflective information for policy, planning, and programs. The following case study shows, however, that local effort has limits that only state action can address.

The Austin Case Study

The Evolution of Municipal Data Systems and Demographic Realities in Austin

The structural relationship between municipal planning and demographic representation in Austin has deep roots. The City's 1928 comprehensive plan, prepared by consultants, explicitly institutionalized racial segregation, directing Black residents east of East Avenue; a boundary later hardened by the construction of I-35.[xxiv] Nearly a half-century later, the Austin Tomorrow Goals Program (1973–74) marked a deliberate departure from consultant-driven planning, engaging more than 2,800 residents through neighborhood meetings.[xxv] Yet the City's own participation data revealed persistent skew: professionals constituted 48 percent of the Goals Assembly compared to 18 percent of the city's residents, Mexican residents were underrepresented relative to their citywide share, and participants were disproportionately male.[xxvi] Those figures rested on a four-category ethnicity scheme of the City's own design: Black, Mexican-American, Anglo, and Other.[xxvii] What the City could see about who participated depended on the categories it chose to count.

TABLE 1-1: DEMOGRAPHIC CHARACTERISTICS

DEMOGRAPHIC CHARACTERISTICS	GOALS ASSEMBLY	GOALS PROGRAM	CITY-WIDE
OCCUPATION			
Professional	48%	44%	18%
Sales	5%	5%	4%
Blue Collar & Service	5%	5%	21%
Clerical	7%	6%	13%
Student, College	13%	13%	17%
Student, High School	2%	4%	5%
Not in Work Force	20%	23%	22%
ETHNICITY			
Black	9%	6%	10%
Mexican-American	8%	7%	13%
Anglo	83%	83%	76%
Other	0%	4%	1%
SEX			
Male	61%	51%	48%
Female	39%	49%	52%

Figure 6: Austin Tomorrow Goals Assembly participation by ethnicity. Source: City of Austin, Department of Planning, Austin Tomorrow Comprehensive Plan (Austin, 1980), 7. Courtesy of the Austin History Center, Austin Public Library.

The imbalances in participation persisted into the modern era. The Imagine Austin process (2009–2012) engaged more than 18,500 community members and explicitly prioritized reaching underrepresented groups, but its own demographic tracking again showed White residents overrepresented to the city's composition.[xxviii]

Meanwhile, in the five decades since Austin Tomorrow, the city's population has transformed and its diversity today is unambiguous: Hispanic or Latino residents comprise 31.9% of the city's population, non-Hispanic Asian residents 9.0%, and non-Hispanic Black residents 7.3%, while non-Hispanic White residents (47.0%) no longer constitute a majority.[xxix] Nearly one in five Austinites (18.7%) is foreign-born.[xxx]

Austin's data practices have also changed across its institutions, though not always uniformly from one entity to another. The categories a government uses determine which communities it can see: a resident counted as "Other" in 1974, or collapsed into a broad "Hispanic" category today, is invisible to the analyses that direct resources and shape policy. Any assessment of Austin's readiness to serve its current population must therefore begin with the standard against which data collection practices are measured. That standard is the federal Office of Management and Budget's Statistical Policy Directive No. 15, described earlier.

Austin's Data Collection Ecosystem

The City of Austin

Similar to the state baseline, the City of Austin does not have a unifying directive for collecting disaggregated data. Each department collects what it needs, primarily for its own reporting purposes. Race and ethnicity questions, along with gender and sexuality questions, are inconsistent both across departments and with national best practices. The result is a system that is fragmented, with two main challenges rising to the top: the inconsistency of survey tools and the variance in methodology. Departments utilize a variety of survey tools such as SurveyMonkey, Google Forms, and other internal department systems including SpeakUp Austin, the city's online community engagement hub.[xxxi] While the use of varied tools does not inherently present a challenge to collecting data, it does fragment data, making it more challenging to reconcile demographic data across surveys and departments. For example, SpeakUp alone holds 1.6 million largely unstructured comments over the last 10 years.[xxxii] This means that a decade of public comment sits in a form that cannot be systematically analyzed, much less disaggregated consistently. The methodological variance across how the data is collected is perhaps the more consequential of the two. Different question wording, different race and ethnicity categories, and different "select all" vs. forced-choice conventions create artificial differences between populations that are really artifacts of instrument design and not of the populations themselves.

Despite the operational challenges, the City does have the intellectual infrastructure for disaggregated race and ethnicity data, driven by its commitment to equity. That commitment

has a traceable origin. In Strategic Direction 2023, which was adopted by City Council in 2018 (and refreshed in 2021), the City stated:

> ***As we measure performance, we are committed to segmenting data by race/ethnicity, age, gender, income, geography, and more whenever possible to understand how well performance is being achieved from an equity standpoint.***[xxxiii]

The following year, the Joint Inclusion Committee built on that commitment, passing a resolution requesting that the City collect disaggregated demographic data for reporting to the Quality of Life commissions.[xxxiv]

The City's current Citywide Strategic Plan carries the equity framing forward, though not the explicit segmentation language. In that plan, the City identified six strategic priorities including Community Health & Sustainability, Economic & Workforce Development, High-Performing Government, Homelessness & Housing, Mobility & Critical Infrastructure, and Public Safety. These priorities are anchored by six foundational values identified that the City identifies as "Strategic Anchors", with the first being Equity.[xxxv] The plan defines the equity anchor as the City's commitment to eliminating disparities and achieving better outcomes for all residents, regardless of race, gender, age, income, or neighborhood. A more concrete example of the City's directionality towards data disaggregation is found in Strategy HG.4.1.5, which directs City departments to collect demographic information from Austinites who engage with City representatives at city led events as a way to improve service delivery and equitable outreach. Several of the plan's other strategies, though they do not say so explicitly, can only be carried out with disaggregated data.

Where the City has gone beyond the baseline is in the informal processes currently led by the city's demographer, a position not common across US cities, but essential for planning. City demographers analyze population growth, movement, and the economic impact of such trends.[xxxvi] In Austin, the city demographer developed a demographic data guide intended as a people-first resource for more equitable and inclusive demographic data collection, analysis, and visualization. The clearest application of this approach to date is found in the studies commissioned by the city's Quality of Life commissions. Three commissions worked with the Demographer's office to develop standardized demographic forms, and data collection was conducted in person, with vendors and subcontractors sitting alongside community members to complete them. This design choice was made partly to address resident uncertainty about whether disclosing race is legal or safe. This is likely the closest the City has come to a replicable model. That model also embeds a critical methodological choice: the forms omit "select all that apply" and "multiracial" options, instructing respondents instead to choose the race or ethnicity with which they most identify, on the rationale that aggregation dilutes race as a determinant in outcomes analysis.

The office's influence already reaches beyond its own work. When the Office of Police Oversight surveyed residents, it allowed respondents to self-identify across race and ethnicity, gender identity, and other characteristics, and it built those categories in consultation with the City Demographer. [xxxvii]

> *"Disaggregating data allows us to see what aggregated numbers too often hide. By breaking information into meaningful demographic groups, we uncover disparities essential to equitable decision-making. Austin is leading this work by embedding disaggregation into its equity framework, yet fully realizing this vision requires consistent, standardized practices across all City departments. By unifying how we collect and segment data, Austin can ensure that every dataset—and every decision—advances a more equitable and people-centered future."*
> *-Lila Valencia, City Demographer, City of Austin*

Austin Energy

Austin Energy, the City-owned electric utility and one of its largest departments, operates largely outside federal reporting requirements. Its customer financial assistance programs are funded through utility rates rather than federal dollars, so no federal mandate governs what demographic data it collects. In the absence of a mandate, and because of privacy concerns, the utility does not routinely collect race or ethnicity data, though it provides strong examples of how to incorporate locally collected demographic information.

Its assistance programs, serving households at or below 200 percent of the federal poverty line, work around that data collection gap to identify households in need. An annual data segmentation project combines state benefits enrollment data, summarized by zip code, with 15 to 18 financial stress indicators from its billing system.[2] The approach targets households and places rather than individuals, and race and ethnicity do not factor into it. The billing system holds no demographic data, and the state enrollment data doesn't provide it, despite the fact that the Health and Human Services Commission collects race and ethnicity from applicants. While geographic targeting can locate concentrated need, it cannot show whether participation differs across groups within that same area.

Austin Energy's strategic planning takes a different approach. Rather than tracking only customers who fall behind on bills, the utility is planning a dashboard to measure energy burden across its entire customer base. The dashboard will combine payment behavior, usage patterns, and community-level data, and it aims to disaggregate that burden by race, ethnicity, age, and medical vulnerability. This work is anchored in an energy equity framework, addressing recognitional, procedural, and distributional equity, which stakeholders pressed for during development of the Resource Generation Plan. [xxxviii]

City Council has also directed Austin Energy to develop a strategy for equitable siting of gas peaker plants by Dec. 31, 2026. The strategy will weigh demographics, heritage sites, and multigenerational land ownership, with the aim of avoiding concentrated burdens on East Austin, an area already long burdened by segregation and disinvestment following the 1928

2 These indicators include repeated disconnections, recurring late fees, and frequent payment arrangements. The utility maps these data to zip codes and census tracts and cross-checks them against United Way 2-1-1 basic-needs call data and City equity data.

Master Plan.[xxxix] Federal tools offer limited support for this work. Federal energy burden estimates do not reflect municipal rates, and the Environmental Protection Agency (EPA)'s EJScreen went offline in recent years.[xl] Austin Energy instead is proposing to overlay its operational data onto the City's Levers of Economic Mobility Index (LEMI) once it is expanded to cover their full certificated service area.

> *"Our energy burden dashboard will show not just who uses our programs, but where energy inequities persist. By layering sociodemographic data and examining the energy equity gap, we can reveal the energy-limiting behaviors traditional income-based metrics miss—families reducing heating or cooling to avoid high bills."*
>
> *-Keree Brannen, Program Manager II, Equity & Inclusion, Austin Energy*

That makes Austin Energy well positioned to close the energy equity gap. Adding tract-level race and ethnicity estimates from the American Community Survey (ACS) would fit within that existing process and require no new questions of customers, though changes to federal data products may limit how much detail those estimates provide in the future. The dashboard provides a natural point to add in that layer. And because no federal floor governs Austin Energy's data, no federal ceiling limits it either; the utility is free to set a standard of its own. As one of the City's largest departments, its choices show others that disaggregated data is both feasible and expected.

Other Austin Entities

Beyond City departments, a preliminary scan of other service-providing entities in Austin brought forward additional insights into data collection and disaggregation practices in the region. The findings should be read as suggestive rather than representative. CapMetro, the City's public transportation provider, and Austin ISD highlight a structural condition that differs meaningfully from the City's: their demographic data practices are shaped primarily by external mandate rather than internal governance.

Demographic collection at CapMetro is driven primarily by Federal Transit Administration (FTA) requirements and applied most visibly through Title VI analysis. Service changes occur three times annually, two of them major, and each proceeds through public hearing to board approval. Assessment draws on census data, rider surveys, and customer profile information to evaluate disparate impact and disproportionate burden. Demographic and economic market analysis also informs broader service planning, discretionary grant applications, and ridership and performance metrics. Federal requirements therefore establish a floor, and the agency exercises real discretion above it. CapMetro also applies a low-income threshold of $56,000, which the City of Austin sets as a standard given Austin's affordability conditions.[xli] Similar discretion appears in its equitable transit-oriented development framework and in transit propensity and sensitivity analysis, both of which are designed to account for the most vulnerable populations. These meaningful choices show that the public transit agency consistently goes further than the federal floor in ensuring the community is reflected in its analysis and policy choices.

> *"When it comes to data desegregation, it's the pieces that make us whole and sustainable. Desegregation of data is needed to better understand the needs of the communities that we serve, and to be able to make the system deliver 'greater good' with limited resources. As we prepare service change proposals, plan a route, place a stop, or prepare for growing the system, we break down summarized datasets into smaller, granular ones—by areas, groups, timeframes- to reveal hidden patterns, disparities, and localized needs that citywide averages conceal."*
>
> *-Sharmila Mukherjee, Executive Vice President, Chief Planning and Development Officer, CapMetro*

Austin ISD is the city's largest public school district. The district's data collection is governed by state and federal reporting standards, primarily the Texas Student Data System, which specifies which variables are collected and how they are named.[xlii] Compliance reporting drives nearly all other reporting, a deliberate choice that preserves comparability across districts. The district's public scorecard demonstrates aggregate reporting against state and federal models. Here, the constraint operates as a ceiling more than a floor. Race and ethnicity categories shift with census standards and flow into reporting requirements accordingly; proposed revisions currently pending mean the district, like other government entities, is waiting on census implementation before changes can move. Disaggregation beyond compliance requirements is understood as valuable but not always feasible due to resource constraints. The district relies on partner researchers and advocates to build fuller pictures through triangulation and alternative methods, which places the analytical burden outside the institution holding the data.

CapMetro and Austin ISD possess a standardization that is a byproduct of compliance. CapMetro shows that discretion above the federal floor exists and can be used well while Austin ISD is waiting for a federal standard to arrive.

Table 2. Race and Ethnicity Data Collection Practices Across Selected Entities in Austin

	Question format	Race/ethnicity categories	Multiple selections	MENA category	Detailed subgroups
SPD 15 (2024 federal standard)	One combined question	7 minimum categories	Yes, encouraged	Yes	Required in most cases
Austin Energy	n/a	None collected	n/a	n/a	n/a
Austin ISD (via TEA)	Two-part (ethnicity, then race)	Hispanic/Latinc or not; 5 races	Yes, for race	No, counted as White	No
City of Austin: recommended practice (People-First Data guide, draft)	One combined question	7 categories plus a self-identify write-in	Yes, select all that apply	Yes	Optional, through write-ins or targeted Asian and Hispanic/Latine follow-up questions
City of Austin Departments	Varies	Varies	Varies	Varies	Varies

Note: Austin Energy business units within the department rely on customer account data and do not routinely collect race or ethnicity. They do administer surveys from time to time and can request race/ethnicity when appropriate—such as during the equity audit—but is generally not part of standard operational data collection.

What Austin Teaches Us

Austin's experience offers five lessons for cities working towards improving race and ethnicity data collection, especially as federal standards shift beneath them:

1. **A commitment is not the same as a standard.** Austin's strategic plans commit to equity, and in places, to segmenting data by race and ethnicity. The City Demographer's People-First Data guide shows what consistent collection could look like. The guide, however, has not been formalized, and it works today because individual staff champion it. Formalizing the guide could be a meaningful step to lift the regional government with the biggest budget, most staff, and biggest day-to-day impact on people's lives above the shifting federal minimum, converting an individual champion's practice into institutional infrastructure and sending a clear message to residents that they are seen.

2. **Entities whose data practices strictly follow federal mandates inherit federal changes often bringing setbacks they cannot control.** For example, in June 2026, the U.S. Department of Transportation eliminated disparate-impact liability from its Title VI regulations, which removes the legal foundation for the equity analysis transit agencies like CapMetro have long performed.[xliii] The 2024 federal race and ethnicity standards, which school districts like Austin ISD use, are delayed. New limits on the Census Bureau's privacy methods have postponed the latest ACS estimates and may reduce detail for smaller racial and ethnic groups.

3. **Without a mandate in place, data often goes uncollected.** Austin Energy faces no federal floor, but in its strategic planning is already shifting toward local data as federal tools disappear. However, without race and ethnicity data, that local baseline can only approximate who its programs reach, and the decision to collect that data rests entirely with the City.

4. **Local standards need a state partner.** A formalized, statewide standard would do what federal compliance increasingly cannot. It would hold expectations steady regardless of which direction federal guidance moves. A City standard, however well-designed, remains tentative until state statute sets the tone.

5. **Austin teaches us that trust is a critical part of the data collection ecosystem.** The City of Austin's Quality of Life studies demonstrate that race and ethnicity data collection can feel overwhelming or unsafe for some people. Standardized categories matter only if residents feel safe answering the questions. Building that trust, and protecting the information residents share, is the responsibility of every entity that collects their data.

Recommendations

Austin has already laid much of the groundwork for strong demographic data practices. Cities, as Austin has done, can set an example of what is possible, but they cannot set standards for state agencies or the school districts within their borders. The opportunities reflect the foundational work and are organized by the institutions best positioned to act on them.

City of Austin

- Build on the City Demographer's work to create a shared citywide standard. The demographic data guide and the Quality of Life studies offer a tested model. Formalizing them would help keep these practices in place beyond the staff who champion them today. A shared standard that is aligned with SPD 15 would harmonize data across departments, making it easier to understand how residents are experiencing and interacting with city government and its services.

State of Texas

- Establish a statewide race and ethnicity data standard. The Legislature could adopt a uniform standard for state agencies that aligns with SPD 15, including detailed subgroups, the option to select more than one category, and a Middle Eastern or North African category. Proposals such as HB 986 and HB 3564 offer a starting point.

- Make state data more useful to local partners as federal data becomes less certain. State agencies already collect race and ethnicity data that rarely reaches the local entities serving the same residents. For example, the Health and Human Services Commission collects this information from applicants, but the enrollment data it shares with Austin Energy contains none. Sharing disaggregated data with local partners in privacy-protective forms and investing in state demographic capacity would help Texas communities fill gaps as federal products are delayed or lose the critical details necessary for effective public policy.

Conclusion

The race and ethnicity categories a government uses determine which communities it can see and, therefore, which communities it can respond to. This was true in 1790, when the first census sorted residents into five groups. It was true in the 1970s, when Austin Tomorrow counted its Goals Assembly using four ethnicity categories of its own. It remains true today as institutions across Austin decide how to ask residents who they are.

Those decisions now carry more weight because the federal foundation beneath them is shifting, and in Texas no statewide standard fills the gap. Cities like Austin are left to innovate within the bounds set by state and federal governments.

Austin has shown that a city can lay the groundwork to ensure data collection practices meet or go beyond the federal baseline. Where city governments' scopes end, Texas must set a statewide standard for agencies and school districts. Every institution that asks residents who they are must earn their trust and demonstrate to all residents that it is safe to answer. Ultimately, every resident deserves public policy that is based on a complete count of who they are, where they live, how they live, and what public policies will effectively support equitable and effective service delivery.

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