

February 23, 2022

Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Department of Commerce

Submitted via *reginfo.gov*

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey (OMB No. 0607-1013)

Dear Sheleen Dumas,

This comment is submitted on behalf of nine organizations committed to advancing opportunity and equality for LGBTQI people in the United States. We appreciate the opportunity to comment on the Federal Register Notice (FRN) regarding the next phase of proposed changes to the U.S. Census Bureau Household Pulse Survey (the “Pulse Survey”).¹

We know that key to advancing LGBTQI equality is understanding the experiences of LGBTQI people across various aspects of life. Many of our organizations have long advocated for increased sexual orientation and gender identity data collection, and more recently intersex data collection, on federal surveys because we understand the value of high quality, federally collected data from nationally representative surveys.

We are appreciative of the U.S. Census Bureau and the collaborative Household Pulse Survey team for the inclusion of questions in Phase 3.2 and 3.3 surveys, which allow for the identification of lesbian, gay, and bisexual people as well as a separate two-step question that allows for the identification of transgender people.² Especially during the COVID pandemic, which exacerbated preexisting disparities and challenges, having data from the Household Pulse Survey including LGBT people has been incredibly impactful. This critical data is being used by researchers and advocates to understand the experiences of LGBT people during the pandemic and it has great potential for informing the development of policies that can improve the lives of LGBT people across the country. For example, the data tables that were released allowed advocates and the media³ to quickly identify disparities including job losses, food insecurity, and housing instability. Subsequent analyses of the public use files have allowed researchers to examine differences among transgender people, including based on race.⁴

The data visualization tool⁵ released in November 2021 marks a milestone for the U.S. Census Bureau and its commitment to ensuring that LGBT people are not only counted as LGBT people but that data about this community is accessible to all.

¹ <https://www.federalregister.gov/documents/2022/01/24/2022-01237/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>

² https://www2.census.gov/programs-surveys/demo/technical-documentation/hhp/Phase_3.2_Household_Pulse_Survey_FINAL_ENGLISH.pdf; <https://omb.report/icr/202110-0607-002/doc/115856300>.

³ <https://www.bloomberg.com/news/articles/2021-11-05/lgbtq-people-were-more-likely-to-lose-income-during-the-pandemic>

⁴ <https://williamsinstitute.law.ucla.edu/publications/trans-food-insufficiency-covid/>

⁵ <https://www.census.gov/library/stories/2021/11/census-bureau-survey-explores-sexual-orientation-and-gender-identity.html>

We voice our strong support for continuing to include these sexual orientation and gender identity questions in Phase 3.4 of the Household Pulse Survey instrument and urge the Census Bureau to include SOGI questions as a permanent fixture for as long as this survey continues to be conducted. The inclusion of these questions will allow for pooling of data across the Household Pulse cycles that is frequently necessary to have large enough sample sizes to do deeper in-group analyses, such as to examine the experiences of Black LGBT people compared to their white peers. Given what previous research from community-based surveys and the American Community Survey and decennial census have revealed, this type of deeper analysis is critical to better understanding the ways in which the lives of LGBT people of color, in particular, are impacted by not only their sexual orientation and gender identity but also their race and/or ethnicity.

Continuing the Work

In addition to continuing the inclusion of questions allowing for the identification of LGBT people in the Household Pulse Survey, we also recommend the following next steps:

- **The Census Bureau should engage in research, development, and testing for measures that allow for the identification of intersex, nonbinary, and other sexual and gender minority populations, as recommended by the National Academies of Sciences, Engineering, and Medicine.⁶**
- **Increase sample sizes.** Larger sample sizes would improve the ability for the Center and others to analyze results for Asian, non-Hispanic women, LGBTQ people (including a better confidence level for a breakout for trans people), LGBTQ seniors, and other demographics that currently have high margins of error.
- **Work quickly with OMB to advance these questions for surveys including the American Community Survey and the decennial Census.** We ask that work conducted in 2017 to test how these questions perform in surveys that are household-based be revitalized so that they can be included as quickly as possible on the American Community Survey and the 2030 Census.⁷

Thank you for the opportunity to submit these comments on this important information collection. If you have questions, please contact Naomi Goldberg (naomi@lgbtmap.org).

Submitted on behalf of the following organizations:

Fenway Health
GLSEN
interACT: Advocates for Intersex Youth
Movement Advancement Project
National LGBT Cancer Network
National Health Law Program
Center for LGBTQ Economic Advancement & Research (CLEAR)
The Trevor Project
Whitman-Walker Institute

⁶ CHARLOTTE J. PATTERSON, MARTIN-JOSÉ SEPÚLVEDA & JORDYN WHITE, EDs., NAT'L ACADS. OF SCI., ENGINEERING, AND MED., COMMITTEE ON POPULATION, UNDERSTANDING THE WELLBEING OF LGBTQI+ POPULATIONS (2020), <https://www.nap.edu/read/25877/chapter/1>.

⁷ <https://www.npr.org/2018/09/20/649752485/trump-officials-did-not-want-census-survey-to-ask-about-sexual-orientation>