

October 15, 2021

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 30 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

Key to advancing LGBTQI equality is the ability to understand the experiences of LGBTQI people across various aspects of life. Data from the U.S. Census decennial census and the American Community Survey, for example, have been instrumental in breaking down stereotypes about same-sex couples, where they live, and what their families look like. 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.

That’s why we wish to express our enthusiasm and deep gratitude to the U.S. Census Bureau and the collaborative Household Pulse Survey team for the inclusion of questions in the Phase 3.2 survey that 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 that includes LGBT people is vital. This critical data is already 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.

¹ Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey, 86 Fed. Reg. 51,653 (Sept. 16, 2021), <https://www.federalregister.gov/documents/2021/09/16/2021-20052/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://www2.census.gov/programs-surveys/demo/technical-documentation/hhp/Phase%203.2%20Household%20Pulse%20Survey%20FINAL%20ENGLISH.pdf)

For example, the data tables that were released allowed advocates³ and the media⁴ to quickly identify disparities including in job losses, food insecurity, and housing instability. Subsequent analyses of the public use files have allowed researchers to examine differences among LGBT people, including based on race.

We wish to voice our strong support for continuing to include these sexual orientation and gender identity questions in Phase 3.3 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 diverse populations,** as recommended by the National Academies of Sciences, Engineering, and Medicine.⁵
- **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.
- **Publish microdata files sooner.** We appreciate that the Census Bureau includes breakouts by sexual orientation and transgender status in the Household Pulse Survey data tables. Given this particular population and the nuances within the population, many researchers and advocates also rely on the microdata files to analyze crosstabs by sex, gender, and sexual orientation as well as other key demographic characteristics including race and ethnicity and childrearing. These files are generally released two weeks after the Survey's data tables, with some file releases coming even later. Decreasing the length of time between publishing the tables and the microdata files, even by a week, would improve ability to produce materials about how women of color are faring. This

³ <https://aninjusticemag.com/a-u-s-census-first-sogie-questions-included-in-household-pulse-survey-edd6629290c0>

⁴ <https://19thnews.org/2021/09/lgbtq-census-data-federal-collection-first-time/>

⁵ 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>.

would consequently improve our advocacy for policy changes to improve their health and economic security.

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:

American Psychological Association
Campaign for Tobacco-Free Kids
Center for American Progress
Center for LGBTQ Economic Advancement & Research (CLEAR)
CenterLink: The Community of LGBT Centers
CHLP
Equality California
FORGE, Inc.
GLMA: Health Professional Advancing LGBTQ Equality
GLSEN
interAct: Advocates for Intersex Youth
Los Angeles LGBT Center
MAZON: A Jewish Response to Hunger
Mazzoni Center
Movement Advancement Project
NASTAD
National Association of Social Workers
National Black Justice Coalition
National Partnership for Women & Families
National Women's Law Center
PowerOn, a program of LGBT Technology Institute
RESULTS
SAGE
SHK Global Health
Silver State Equality-Nevada
The Trevor Project
Transgender Law Center
Union for Reform Judaism
URGE: United for Reproductive & Gender Equity
Whitman-Walker Institute