

April 12, 2021

G. Brian Wilson
U.S. Census Bureau
American Community Survey Office
Submitted via *regulations.gov*

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; American Community Survey Methods Panel Tests (Docket Number USBC-2021-0002).

Dear G. Brian Wilson,

We write in response to the U.S. Census Bureau request for comments on the proposed revision of the American Community Survey (ACS) Methods Panel Tests (MPT) (86 FR 8756).¹ Specifically, we aim to address the need for the U.S. Census Bureau to add data collection on sexual orientation and gender identity (SOGI) to the ACS through the MPT content testing process.

This letter is submitted on behalf of 32 organizations committed to advancing equality and opportunity for lesbian, gay, bisexual, transgender, and queer (LGBTQ) people in the United States. Our interest and expertise in this area compel us to communicate the need for SOGI data measures to be incorporated into the ACS MPT content testing process. Doing so will offer valuable insight into the demographics, housing security, and broader socioeconomic status of LGBTQ Americans and is critical to capturing a more comprehensive, accurate, and data-driven understanding of disparities faced by LGBTQ communities and developing evidence-based policy interventions.

This comment speaks to the current composition and purpose of the ACS and its MPT content testing; the disparities in socioeconomic security and housing faced by LGBTQ people; and the need to include SOGI data collection in the ACS MPT content testing process. While not the primary focus of this comment, we also wish to express our support for the U.S. Census Bureau to test and implement intersex status measures as recommended by the National Academies of Sciences,

¹ U.S. Census Bureau, “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; American Community Survey Methods Panel Tests” *Federal Register* 86 (25) (2021): 8756-8759, available at <https://www.govinfo.gov/content/pkg/FR-2021-02-09/pdf/2021-02606.pdf>.

Engineering, and Medicine.² As the recent NASEM report observes: “Intersex status is almost never queried in population surveys, and the stigma associated with having intersex traits may inhibit people from self-identifying” (1-6). A culture of secrecy in the medical profession has historically prevented many people from developing a complete understanding of their intersex traits. Yet this is rapidly changing, and estimates based on existing data suggest the intersex population is comparable in size to the transgender population. Moreover, the NASEM report recognizes that an emerging body of evidence points to social, educational, and health disparities affecting intersex people, which appear to be “informed by the same stigmas experienced by lesbian, gay, bisexual, and transgender people” (1-6, 7). “Fortunately,” the NASEM report notes, “researchers and advocates have identified questions that can be used to assess intersex status in population surveys” (1-7). The Census Bureau should develop and test such measures, in consultation with the Office of Management and Budget and other agencies.

I. Background on the American Community Survey and Method Panel Tests

Conducted by the U.S. Census Bureau, the ACS is an ongoing population-based survey that collects critical information about the social, economic, housing, and demographic characteristics of approximately 3.5 million households each year across the country.³ ACS data are processed and disseminated by the U.S. Census Bureau and used by government agencies to inform data-driven decision-making including how to annually allocate over \$675 billion in federal and state funding of programs and services across the country.⁴ Notably, in addition to using ACS data to evaluate and assess government programs and services, federal agencies use this data to monitor and enforce employment nondiscrimination laws.⁵ The ACS also serves as a particularly important measure of geographic-specific information; given that there is currently a patchwork of legal protections for LGBTQ individuals that differs greatly between states and localities, understanding how experiences vary across locations is of paramount importance.

Currently, the ACS does not ask any questions about gender identity or sexual orientation and allows only for the identification of cohabitating same-sex couples,⁶ which is a valuable but limited proxy measure for capturing information on sexual orientation.⁷ For the Census Bureau to expand data

² National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTQI+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>.

³ U.S. Census Bureau, “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; American Community Survey Methods Panel Tests” *Federal Register* 86 (25) (2021): 8756-8759, available at <https://www.govinfo.gov/content/pkg/FR-2021-02-09/pdf/2021-02606.pdf> and U.S. Census Bureau, “About the American Community Survey,” available at <https://www.census.gov/programs-surveys/acs/about.html> (last accessed March 2021).

⁴ U.S. Census Bureau, “American Community Survey Information Guide,” available at https://www.census.gov/content/dam/Census/programs-surveys/acs/about/ACS_Information_Guide.pdf (last accessed March 2021).

⁵ Ibid.

⁶ Ibid.

⁷ National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTQI+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>.

collection through the ACS that captures LGBTQ communities more broadly and more accurately, it is crucial that SOGI questions continue to advance through the content testing process. Doing so is integral to ensuring each new question has been thoroughly researched, tested and evaluated so that its inclusion allows for collecting high quality data without reducing overall respondent participation.⁸ Given the discrimination and resulting disparities in housing, employment and economic security⁹ that LGBTQ people experience throughout their lives, it is vital to expand and enhance the ACS by including demographic questions that accurately capture SOGI, both for research purposes and for real-time economic and other policymaking.

II. LGBTQ disparities in economic security and housing stability

LGBTQ communities face disproportionate economic difficulties, high rates of poverty, housing insecurity and unemployment, and significant vulnerability to homelessness and food insecurity, while institutional and systemic discrimination has also negatively contributed to the financial well-being of LGBTQ families.¹⁰ Indeed, evidence reveals LGBTQ people face high unemployment rates as well as wage disparities, discrimination and harassment, and underrepresentation in high-wage, high-quality jobs.¹¹ These problems adversely affect workforce experiences, serve as barriers to workforce entry, and narrow critical pathways to economic advancement for LGBTQ people, their families, and communities. For LGBTQ people living at the intersection of multiple identities, such as LGBTQ people of color, these challenges are even greater. While there is significant research demonstrating the unique difficulties faced by these groups, the lack of federal data leads to uncertainty regarding the full extent of these hardships, limiting the capacity for meaningful and targeted action.

These factors contribute to the kind of disproportionately high rates of poverty amongst LGBTQ individuals that high-quality, regularly collected localized labor market data would be crucial to better understand. While the Census Bureau reports that less than 12% of the general population lived in poverty in 2019, the current rate of LGBTQ people experiencing poverty is nearly 22%.¹² This number

⁸ U.S. Census Bureau, “Content Test,” available at <https://www.census.gov/programs-surveys/acs/methodology/content-test.html> (last accessed March 2021).

⁹ Sharita Gruberg, Lindsay Mahowald, and John Halpin, “The State of the LGBTQ Community in 2020: A National Public Opinion Study” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/lgbtq-rights/reports/2020/10/06/491052/state-lgbtq-community-2020/>.

¹⁰ Caroline Medina, Sharita Gruberg, Lindsay Mahowald, and Theo Santos, “Improving the Lives and Rights of LGBTQ People in America” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/lgbtq-rights/reports/2021/01/12/494500/improving-lives-rights-lgbtq-people-america/>.

¹¹ Movement Advancement Project and National LGBTQ Workers Center, “LGBT People in the Workplace: Demographics, Experiences and Pathways to Equity” (Washington: 2019), available at <https://www.lgbtmap.org/file/LGBT-Workers-3-Pager-FINAL.pdf>; Williams Institute, “Documented Evidence of Employment Discrimination and Its Effects on LGBT People” (Los Angeles: University of California Los Angeles School of Law, 2011), available at <https://williamsinstitute.law.ucla.edu/publications/employ-discrim-effect-lgbt-people/>; National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTQI+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>.

¹² The National LGBTQ Anti-Poverty Action Network, “Poverty at the End of the Rainbow” (Boston: December 18, 2020), available at <https://nclr.turtl.co/story/poverty-at-the-end-of-the-rainbow/page/2/1>.

increases to 29% amongst transgender individuals, 31% amongst Black LGBTQ individuals, and over 35% amongst LGBTQ women. In 2017, 27% of LGBTQ adults experienced food insecurity, compared to just 11% of non-LGBTQ adults, and LGBTQ adults are 1.6 times more likely than their non-LGBTQ counterparts to not have enough money to afford food for themselves or their families.¹³ As a result, LGBTQ individuals are also much more likely to receive public assistance – while just 16% of general population households received SNAP benefits last year¹⁴, 25% of LGBTQ individuals reported that they or their family had received assistance from SNAP between June 2019 and June 2020, and also reported high usage of unemployment insurance, Medicaid, SSI, and TANF.¹⁵

Combined with disproportionate economic hardships, experiences of discrimination in labor and lending markets, as well as housing create particular barriers to achieving stable and affordable housing. 13% of LGBTQ homeowners reported experiencing discrimination from lenders and real estate agents,¹⁶ while same-sex couples on average pay higher interest rates and experience higher rates of loan rejection than their different-sex counterparts.¹⁷ Even in rental situations, LGBTQ individuals often face harassment – nearly 1 in 3 respondents to a recent survey by the Center for American Progress (CAP) reported that discrimination had a moderate to significant impact on their ability to rent or buy a home, while 1 in 5 reported experiencing discrimination in an apartment community.¹⁸

These factors collectively make it increasingly difficult for LGBTQ individuals to become homeowners: analysis from the Williams Institute finds that LGBTQ people are 20% less likely to own homes than their non-LGBTQ counterparts.¹⁹ Meanwhile, high rates of rejection from family members make LGBTQ youth and young adults 120% more likely to experience homelessness.²⁰ Notably, adding SOGI questions to the ACS will foster more accurate data collection that is crucial

¹³ Ibid.

¹⁴ Based on Center for American Progress calculations of the number of households who received SNAP benefits in 2020 (based on USDA data, available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/34SNAPmonthly-3a.pdf>) and the total number of households in the U.S. (based on Census Bureau data, available at <https://www.census.gov/data/tables/2020/demo/families/cps-2020.html>).

¹⁵ Caroline Medina and Lindsay Mahowald, “Lessening the Pandemic’s Burden on LGBTQ Workers and Families” (Washington: Center for American Progress, February 11, 2021), available at <https://www.americanprogress.org/issues/lgbtq-rights/news/2021/02/11/495675/lessening-pandemics-burden-lgbtq-workers-families/>.

¹⁶ Freddie Mac, “The LGBTQ Community: Buying and Renting Homes” (Washington: May 2018), available at http://www.freddiemac.com/fmac-resources/research/pdf/Freddie_Mac_LGBT_Survey_Results_FINAL.pdf.

¹⁷ Jason Richardson and Karen Kali, “Same-Sex Couples and Mortgage Lending” (Washington: National Community Reinvestment Coalition, June 22, 2020), available at <https://ncrc.org/same-sex-couples-and-mortgage-lending/>.

¹⁸ Sharita Gruberg, Lindsay Mahowald, and John Halpin, “The State of the LGBTQ Community in 2020: A National Public Opinion Study” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/lgbtq-rights/reports/2020/10/06/491052/state-lgbtq-community-2020/>.

¹⁹ Adam P. Romero, Shoshana K. Goldberg, and Luis A. Vasquez, “LGBT People and Housing Affordability, Discrimination, and Homelessness” (Los Angeles: University of California School of Law, 2020), available at <https://williamsinstitute.law.ucla.edu/wp-content/uploads/LGBT-Housing-Apr-2020.pdf>.

²⁰ Caroline Medina and Lindsay Mahowald, “Lessening the Pandemic’s Burden on LGBTQ Workers and Families” (Washington: Center for American Progress, February 11, 2021), available at <https://www.americanprogress.org/issues/lgbtq-rights/news/2021/02/11/495675/lessening-pandemics-burden-lgbtq-workers-families/>.

to generating more exact census counts of children, youth²¹ and adults experiencing homelessness – a disproportionate number of whom are LGBTQ – and is therefore critical to securing the full extent of funding needed to support life-saving programs, such as the Runaway Homeless Youth program.²²

Transgender individuals – who are nearly four times more likely than the general population to have a household income of below \$10,000 – face particular challenges in accessing housing.²³ One in 8 transgender individuals have been refused a home or apartment due to their gender identity or expression, with 5% reporting that they had been evicted for the same reason.²⁴ In CAP’s recent study, 37% of transgender respondents reported that discrimination had a moderate to significant impact on their ability to rent or buy a home.²⁵ These high rates of refusal have a significant impact: one-third of transgender individuals have experienced homelessness in their lifetime,²⁶ and the Williams Institute finds that just 32% of transgender individuals are homeowners – less than half the rate of the general population.²⁷

III. The need for the ACS to include SOGI data measures

Presently, a wide range of government surveys do not collect information on SOGI and only approximately 1 in 6 LGBTQ adults (those in same-sex couples) can be identified as LGBTQ from U.S. Census Bureau data.²⁸ Some surveys, such as the decennial census and the ACS, now count same-sex couples, but most major population surveys, including the ACS, do not ask questions about sexual

²¹ Overall, continuing to improve the way that the ACS captures information on SOGI through the content testing process will also be particularly important to better identify LGBTQ youth, who may be under-reported by household members filling out the survey.

²² Jaboa Lake, Jae June Lee, Meghan Maury, and Cara Brumfield, “Count People Where They Are” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/poverty/reports/2020/10/05/491122/count-people-where-they-are/>.

²³ Caroline Medina and Lindsay Mahowald, “Lessening the Pandemic’s Burden on LGBTQ Workers and Families” (Washington: Center for American Progress, February 11, 2021), available at <https://www.americanprogress.org/issues/lgbtq-rights/news/2021/02/11/495675/lessening-pandemics-burden-lgbtq-workers-families/>.

²⁴ James, S. E., Herman, J. L., Rankin, S., Keisling, M., Mottet, L., & Anafi, M. (2016). Executive Summary of the Report of the 2015 U.S. Transgender Survey. Washington, DC: National Center for Transgender Equality.

²⁵ Sharita Gruberg, Lindsay Mahowald, and John Halpin, “The State of the LGBTQ Community in 2020: A National Public Opinion Study” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/lgbtq-rights/reports/2020/10/06/491052/state-lgbtq-community-2020/>.

²⁶ James, S. E., Herman, J. L., Rankin, S., Keisling, M., Mottet, L., & Anafi, M. (2016). Executive Summary of the Report of the 2015 U.S. Transgender Survey. Washington, DC: National Center for Transgender Equality.

²⁷ Adam P. Romero, Shoshana K. Goldberg, and Luis A. Vasquez, “LGBT People and Housing Affordability, Discrimination, and Homelessness” (Los Angeles: University of California School of Law, 2020), available at <https://williamsinstitute.law.ucla.edu/wp-content/uploads/LGBT-Housing-Apr-2020.pdf>.

²⁸ Calculations by Center for American Progress based on the most recent Gallup statistics of LGBTQ individuals and households, released in February 2021 (<https://news.gallup.com/poll/329975/one-lgbt-americans-married-sex-spouse.aspx>). 9.6% of LGBTQ individuals are married to a same-sex spouse, and an additional 7.1% live with a same-sex partner, making them identifiable by current Census Bureau data. Roughly 83% of individuals, those who do not fall in either of the above categories, would not be identifiable.

orientation or gender identity that allow for the identification of LGBTQ people.²⁹ The information gathered by these data collection tools shape major policy decisions and allocations of critical resources related to health care, housing, employment, education, and other public benefits, thereby affecting the everyday lives of LGBTQ people and making the need for SOGI and intersex data measures even more urgent.

As stated above, the ACS does not currently include questions about gender identity or sexual orientation and only allows for respondents to separately identify same-sex spouses and unmarried partners in a household.³⁰ Notably, over the last decade the Census Bureau has worked to modify the ACS questions to enhance the measurement of same-sex couples³¹ and, in 2019, the “Husband or wife” and “Unmarried partner” categories were expanded to include “Opposite-sex husband/wife/spouse” and “Same-sex unmarried partner.”³² While it is valuable to identify same-sex spouses and unmarried partners in a household, doing so provides a limited proxy measure for capturing information about the sexual orientation of individuals, and screens for a nonrepresentative, highly socioeconomically selected sample of this population.³³ For example, according to 2021 Gallup data, just 9.6% of LGBT adults in the U.S. are married to a same-sex spouse, while 7.1% live with a same-sex domestic partner³⁴ – data that highlight how the existing ACS question fails to accurately capture, or even proxy for, the vast majority of the LGBTQ population, which only continues to grow.³⁵

Now is the time for the Census Bureau to complete the process of adding SOGI data measures to the ACS through the MPT content testing. Recognizing the need to address the deficiency of information on LGBTQ populations and explore best methodological practices of SOGI data collection, the Office of Management and Budget convened the Federal Interagency Working Group on Measuring

²⁹ Federal Interagency Working Group on Improving Measurement of Sexual Orientation and Gender Identity in Federal Surveys, “Measurements of Sexual Orientation and Gender Identity in Federal Surveys,” available at <https://nces.ed.gov/FCSM/pdf/buda5.pdf> (last accessed March 2021).

³⁰ U.S. Census Bureau, “American Community Survey Information Guide,” available at https://www.census.gov/content/dam/Census/programs-surveys/acs/about/ACS_Information_Guide.pdf (last accessed March 2021).

³¹ U.S. Census Bureau, “The Evolution of Data Collection for Same-Sex Married Couple Households,” available at <https://www.census.gov/content/dam/Census/library/visualizations/2019/demo/Same-sex-Married-Couple-Timeline.pdf> (last accessed March 2021); and see Laquitta Walker and Danielle Taylor, “Same-Sex Couple Households: 2019 American Community Survey Briefs,” (Washington: U.S. Census Bureau, 2021), available at <https://www.census.gov/content/dam/Census/library/publications/2021/acs/acsbr-005.pdf>.

³² U.S. Census Bureau, American Community Survey and Puerto Rico Community Survey 2019 Subject Definitions,” available at https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2019_ACSSubjectDefinitions.pdf (last accessed April 2021) and U.S. Department of Commerce, Economic and Statistics Administration, “2017 American Community Survey Research and Evaluation Report Memorandum Series # ACS17-RER-06,” available at https://www.census.gov/content/dam/Census/library/working-papers/2017/acs/2017_Kreider_01.pdf (last accessed April 2021).

³³ National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTQI+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>.

³⁴ Jeffrey M. Jones, “One in 10 LGBT Americans Married to Same-Sex Spouse,” Gallup, February 24, 2021, available at <https://news.gallup.com/poll/329975/one-lgbt-americans-married-sex-spouse.aspx>.

³⁵ Ibid.

Sexual Orientation and Gender Identity,³⁶ which published highly valuable reports on improving measurement of sexual orientation and gender identity in federal surveys.³⁷ These resources in addition to other critical studies – such as the Sexual Minority Assessment Research Team [SMART] 2009 report and Gender Identity in U.S. Surveillance [GenIUSS] Group report of 2014 – have investigated and validated how to construct SOGI questions on federally funded surveys, providing a roadmap for the federal government to do so.³⁸ Notably, evidence suggest that data collection of SOGI is feasible in large-scale federally funded surveys such as the ACS; that this information is not considered especially difficult or sensitive for survey respondents to report;³⁹ and that securing participation of sexual minorities does not require higher levels of effort.⁴⁰ Moreover, there are numerous federal surveys that include SOGI questions already, including the National Survey of Family Growth, the National Survey of Older Americans Act Participants, and the Behavior Risk Factor Surveillance System.

Although there is need for additional efforts to complete the process, it's crucial to note that the Census Bureau has already initiated the process of adding SOGI questions to the ACS.⁴¹ In 2016 the U.S. Department of Housing and Urban Development (HUD), U.S. Department of Justice (DOJ), U.S. Department of Health and Human Services (HHS), as well as the U.S. Environmental Protection Agency submitted letters proposing the inclusion of SOGI questions and highlighting the agency-specific legal and programmatic needs for adding such data measures.⁴² For example, such data is

³⁶ Federal Interagency Working Group on Improving Measurement of Sexual Orientation and Gender Identity in Federal Surveys, “Measurements of Sexual Orientation and Gender Identity in Federal Surveys,” available at <https://nces.ed.gov/FCSM/pdf/buda5.pdf> (last accessed March 2021).

³⁷ The Federal Committee on Statistical Methodology, “Measuring Sexual Orientation and Gender Identity Research Group,” available at <https://nces.ed.gov/FCSM/SOGI.asp> (last accessed March 2021).

³⁸ Sexual Minority Assessment Research Team (SMART). 2009. Best Practices for Asking Questions about Sexual Orientation on Surveys. Los Angeles, CA: The Williams Institute, UCLA School of Law. Available from: <http://williamsinstitute.law.ucla.edu/wp-content/uploads/SMART-FINAL-Nov-2009.pdf>; The GenIUSS Group. (2014). Best Practices for Asking Questions to Identify Transgender and Other Gender Minority Respondents on Population-Based Surveys. J.L. Herman (Ed.). Los Angeles, CA: The Williams Institute; National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTIQ+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>; The Williams Institute, “Sexual Orientation and Gender Identity (SOGI) Adult Measures Recommendations FAQs” (Los Angeles: University of California Los Angeles School of Law, 2020), available at <https://williamsinstitute.law.ucla.edu/wp-content/uploads/SOGI-Measures-FAQ-Mar-2020.pdf>.

³⁹ Kellan E. Baker and others, “Ensuring That LGBTIQ+ People Count - Collecting Data on Sexual Orientation, Gender Identity, and Intersex Status,” *New England Journal of Medicine* 384 (2021): 1184-1186, available at <https://www.nejm.org/doi/full/10.1056/NEJMp2032447>.

⁴⁰ Nancy Bates and others, “Are Sexual Minorities Hard-to-Survey? Insights from the 2020 Census Barriers, Attitudes, and Motivators Study (CBAMS) Survey,” *Journal of Official Statistics* 35 (2019): 709-729, available at <https://sciendo.com/article/10.2478/jos-2019-0030>.

⁴¹ See U.S. Census Bureau, “Please Review: Subjects Planned for the 2020 Census and ACS,” available at <https://www2.census.gov/foia/records/SOGI-2020-census-acs.pdf> (last accessed April 2021) and Hansi Lo Wang, “Trump Officials 'Did Not Want' Census Survey To Ask About Sexual Orientation,” NPR, September 20, 2018, available at <https://www.npr.org/2018/09/20/649752485/trump-officials-did-not-want-census-survey-to-ask-about-sexual-orientation>.

⁴² See Senator Tom Carper and Senator Kamala D. Harris, “Letter to John H. Thompson, Director, United States Census Bureau,” May 22, 2017, available at https://www.carper.senate.gov/public/_cache/files/de7e0915-ea9f-4c51-a2d5-f3ee4abe0bf3/2017-05-22-carper-harris-letter-to-census-bureau-re-new-subjects-press-.pdf and Secretary of U.S. Department of Housing and Urban Development, Julián Castro, “Letter to John H. Thompson, Director, U.S. Census Bureau,” June 30, 2016, available as PDF attached for review.

necessary for the DOJ to fulfil its responsibilities enforcing the Violence Against Women Act; for HUD to enforce the Equal Access rule and Fair Housing Act; and for HHS to improve provision of care for LGBTQ beneficiaries of Medicare and Medicaid.⁴³ These actions meet a standard articulated by the Census Bureau to initiate the process of adding new questions to the ACS.⁴⁴ Under the previous administration, the Census Bureau failed to take action,⁴⁵ however, we respectfully request the Bureau resume its activities to finalize adding SOGI questions to the ACS through the MPT content testing process.

Adding measures of SOGI to the ACS is critical to obtain a more comprehensive understanding of the discrimination and resulting disparities in housing, employment, and economic security that LGBTQ people experience, and to ensure that policymaking supports the economic wellbeing and recovery of LGBTQ communities as the country recuperates from the public health crisis and economic recession spurred by the COVID-19 pandemic.⁴⁶

IV. Conclusion

For the reasons stated above, the undersigned organizations respectfully urge the U.S. Census Bureau to advance the process of adding standardized and consistent SOGI questions to the ACS through the MPT content testing process.

Please do not hesitate to contact Caroline Medina, cmolina@americanprogress.org, if you need any additional information. Thank you for your time, and we look forward to continuing this discussion with you.

Signed in partnership,

AIDS Alabama

Atlanta Pride Committee

⁴³ Ibid.

⁴⁴ U.S. Census Bureau, “How a Question Becomes Part of the American Community Survey,” available at <https://www.census.gov/library/visualizations/2017/comm/acs-questions.html> (last accessed April 2021) and National LGBTQ Task Force, “LGBTQ Census Advocacy, 1990-2017” (Washington: 2017), available at <https://www.thetaskforce.org/wp-content/uploads/2017/05/LGBTQ-Census-Advocacy.pdf>.

⁴⁵ Hansi Lo Wang, “Trump Officials ‘Did Not Want’ Census Survey To Ask About Sexual Orientation,” *NPR*, September 20, 2018, available at <https://www.npr.org/2018/09/20/649752485/trump-officials-did-not-want-census-survey-to-ask-about-sexual-orientation> and Hansi Lo Wang, “Biden Wants Census To See ‘Invisible’ Groups: LGBTQ, Middle Eastern, North African” *NPR*, November 14, 2020, available at <https://www.npr.org/2020/11/14/932594879/biden-wants-census-to-see-invisible-groups-lgbtq-middle-eastern-north-african>.

⁴⁶ Caroline Medina and Lindsay Mahowald, “Lessening the Pandemic’s Burden on LGBTQ Workers and Families” (Washington: Center for American Progress, February 11, 2021), available at <https://www.americanprogress.org/issues/lgbtq-rights/news/2021/02/11/495675/lessening-pandemics-burden-lgbtq-workers-families/>.

BiNet USA
CenterLink: The Community of LGBT Centers
Equality California
Equality Federation
Family Equality
Fenway Institute
Food Research & Action Center (FRAC)
FORGE, Inc.
GLMA: Health Professionals Advancing LGBTQ Equality
GLSEN
Howard Brown Health
Human Rights Campaign
interACT: Advocates for Intersex Youth
LGBT Technology Institute
LGBTQ Allyship
Los Angeles LGBT Center
MAZON: A Jewish Response to Hunger
Mazzoni Center
Movement Advancement Project
National Center for Transgender Equality
National Coalition for LGBT Health
National Equality Action Team (NEAT)
National LGBTQ Task Force
Pride Community Services Organization
Silver State Equality-Nevada
The Center for American Progress
The Center for Community Solutions
The Lesbian, Gay, Bisexual & Transgender Community Center
The Trevor Project
Whitman-Walker Institute