



AMERICAN ATHEISTS

September 26, 2022

Jennifer Hunter Childs
Assistant Center Chief
Emerging Methods and Applications
Center for Behavioral Science Methods, Census Bureau

Re: Comment re Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Generic Clearance for Census Bureau Field Tests and Evaluations (Docket No. USBC-2022-0013)

Dear Ms. Hunter Childs:

American Atheists writes in response to the notice of information collection and request for comment by the Census Bureau titled: “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Generic Clearance for Census Bureau Field Tests and Evaluations,” published July 26, 2022.¹ The Census Bureau (hereinafter, “Bureau”) requested comments on its plans to conduct a series of studies to research and evaluate how to improve data collection activities at the Census Bureau. We submit comments pertaining to the interests of nonreligious people, who, like other religious minorities, are poorly served by the lack of general lack of federal data collection pertaining to religion as well as the Christian-centered questions used to identify religious belief in the few federal surveys that do collect such information. We ask you to 1) research and develop appropriate, updated measures for collecting data about nonreligious and religious minority populations and 2) consider where such data measures may be included in the Bureau’s data collection efforts.

American Atheists is a national civil rights organization that strives to achieve religious equality for Americans by protecting what Thomas Jefferson called the “wall of separation” between the government and religion created by the First Amendment. We work to create an environment where atheism and atheists are accepted as members of our nation’s communities and where casual bigotry against our community is seen as abhorrent and unacceptable. We promote understanding of atheists through education, outreach, and community-building and work to end the stigma associated with being an atheist in America. As advocates for religious equality, American Atheists believes that government programs should be inclusive and accessible to people regardless of their religious beliefs or lack thereof.

Improved Data Collection Regarding Religion is Essential for Nonreligious People and Religious Minorities

Despite the stigma and inequities facing nonreligious people and religious minorities living in the US,

¹ Census Bureau, Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Generic Clearance for Census Bureau Field Tests and Evaluations, 87 Fed. Reg. 44336 (proposed July 26, 2022), Docket No. USBC-2022-0013, Doc. No. 2022-15982, <https://www.federalregister.gov/documents/2022/07/26/2022-15982/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>.

there is very little federal data collection pertaining to these populations. Questions about religious belief are not asked on any major federal population survey, such as the YRBS, BRFSS, NSDUH, or NHIS. This results in part from a 1976 law that prohibits the collection of mandatory religious data on the Census, providing that “(c) Notwithstanding any other provision of this title, no person shall be compelled to disclose information relative to his religious beliefs or to membership in a religious body.”² However, this limitation pertains only to mandatory data collection on the Census; the federal government is fully capable of offering voluntary data collection on religion through population surveys, cohort surveys, and other instruments.

There has been substantial research showing that nonreligious people and religious minorities in the US face stigmatization and minority stress that leads to significantly worse psychosocial outcomes.³ For example, members of other faiths consistently rank atheists as the group they feel least positively toward.⁴ And atheists and Muslims face clear bias in terms of government services.⁵ Despite comprising of only 2.4% of the population,⁶ Jewish people were subject to about 63% of religious-based hate crimes in the U.S. in 2019.⁷ Similarly, Muslims, despite making up only 1.1% of the population,⁸ were subject to 12% of religious-based hate crimes. Unfortunately, because there is insufficient data collection concerning religion in US population surveys, the full extent of disparities faced by these populations is unknown.

Because of this lack of data, American Atheists conducted the US Secular Survey, a 2019 survey of nearly 34,000 nonreligious people living in the United States. Data from this survey shows unequivocally that nonreligious people in the US encounter stigma and discrimination in various aspects of their lives.⁹ Nearly one third (29.4%) of survey participants experienced discrimination in education due to their nonreligious identity, and one in five (21.7%) experienced discrimination at work.

Given this treatment, it is no surprise that nonreligious people frequently feel the need to conceal their beliefs. Nearly one third (31.4%) of participants mostly or always concealed their nonreligious identity from members of their immediate family. More than two in five participants mostly or always concealed their nonreligious identity among people at work (44.3%) and people at school (42.8%). Perhaps contributing to the frequent concealment of their nonreligious identities, nearly

² 13 U.S.C. § 221(c).

³ See M. E. Brewster et al., *It's Like Herding Cats: Atheist Minority Stress, Group Involvement, and Psychological Outcomes*, 67 J. COUNSELING PSYCH. 1, 1–13 (2020), <https://doi.org/10.1037/cou0000392>.

⁴ See Pew Research Center, *What Americans Know About Religion* (2019), <https://www.pewresearch.org/religion/2019/07/23/feelings-toward-religious-groups/>.

⁵ See Steven Pfaff, *Do Street-Level Bureaucrats Discriminate Based on Religion? A Large-Scale Correspondence Experiment among American Public School Principals*, 81 Pub. Admin. Rev. 244 (2020), <https://doi.org/10.1111/puar.13235>.

⁶ Pew Research Center, *Jewish Americans in 2020* (2021), <https://www.pewforum.org/2021/05/11/the-size-of-the-u-s-jewish-population/>.

⁷ Bias Motivation, *FBI 2019 Hate Crime Statistics: Incidents, Offenses, Victims, and Known Offenders* (2019), <https://ucr.fbi.gov/hate-crime/2019/topic-pages/tables/table-1.xls>.

⁸ Besheer Mohamed, *New Estimates Show U.S. Muslim Population Continues to Grow*, PEW RSCH. CTR. (Jan. 3, 2018), <https://www.pewresearch.org/fact-tank/2018/01/03/new-estimates-show-u-s-muslim-population-continues-to-grow/>.

⁹ Frazer, S., El-Shafei, A., Gill, A.M. (2020). *Reality Check: Being Nonreligious in America*. Cranford, NJ: American Atheists, www.secularsurvey.org.

half (47.5%) of survey participants were sometimes, frequently, or almost always asked or felt pressure to pretend that they are religious.

Because of the discrimination and stigmatization nonreligious people face in our society, they experience heightened rates of loneliness and depression. Our research shows that one in six (17.2%) of survey participants are likely to be depressed and about one quarter (25.6%) of participants often experience one or more indicators of loneliness and social isolation.

Notably, the level of discrimination and stigmatization was dramatically higher for participants living in very religious areas. Nonreligious participants living in very religious communities were nearly 2.5 times more likely to experience negative events in education than in not at all religious communities, nearly 2.5 times more likely to experience negative events in public services (for example, voting, jury duty, poll work), more than 3 times more likely in employment, and more than 2 times more likely when dealing with private businesses. Moreover, participants living in very religious communities experienced nearly 40% more stigma than those in not at all religious communities.

Religious Data Collection Must Be Inclusive, Voluntary, and Confidential

There are few examples of federal data collection pertaining to religion, and the questions that are used in these collections are outdated, exclusionary, and imprecise. For example, the National Survey on Family Growth (NSFG),¹⁰ one of the few instruments that collects data on religion, is exceedingly Christian-centric, asking respondents to select whether they belong to one of 22 Christian sects, while failing to collect information on various non-Christian religious beliefs or relegating them to a dismissive “other” category.¹¹ Despite the flaws in this methodology, the Trump Administration sought to expand this approach to other data collections.¹² Moreover, there were other misguided attempts made to collect religious data, often in ways that lack accuracy and confidentiality.¹³ In order to both improve religious data collection and forestall these types of efforts to proliferate flawed religious data collection methodologies, we recommend that Bureau and other relevant agencies allocate resources to develop updated survey questions regarding religion for use on appropriate surveys.

A primary consideration for many religious minority populations is confidentiality of data. Concerns about the confidentiality of data arose when in 2019 the Trump Administration updated the Dept. of

¹⁰ CDC, National Center for Health Statistics. National Survey of Family Growth Questionnaires, Datasets, and Related Documentation, https://www.cdc.gov/nchs/nsfg/nsfg_questionnaires.htm.

¹¹ The relevant questions relegate Muslims, Buddhists, and Hindus to the “other” category and fail to collect data on groups such as Sikhs.

¹² See, e.g., Administration for Children and Families, Submission for OMB Review; Youth Empowerment Information, Data Collection Exploration on Avoidance of Sex (IDEAS) (New Collection), 85 Fed. Reg. 49376, Doc. No. 2020-17680, proposed Aug. 13, 2020, <https://www.federalregister.gov/documents/2020/08/13/2020-17680/submission-for-omb-review-youth-empowerment-information-data-collection-and-exploration-on-avoidance>.

¹³ See, e.g., Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Mandatory Civil Rights Data Collection, 85 Fed. Reg. 40628, Docket No. ED-2019-SCC-0119, Doc. No. 2020-14486, proposed July 7, 2020, <https://www.federalregister.gov/documents/2020/07/07/2020-14486/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-for>.

Education's Civil Rights Data Collection (CRDC) to disaggregate bullying based on various religions.¹⁴ We and other civil rights advocates were concerned that the method of data collection would require school administrators to routinely question students (or make assumptions) about their religious beliefs and to create and maintain records about the religious beliefs of students. Because of the lack of confidentiality inherent in this manner of data collection, it may contribute to increased stigmatization and discrimination against religious minority and nonreligious students.

Questions that collect religious data should ideally be self-report data on voluntary surveys. Third-party reports of religious data tend to be inaccurate and lack confidentiality, and so they should be avoided to the extent possible, outside of necessary contexts such as hate crime reporting. Instead, broad, anonymous, population surveys, such as YRBS and BRFSS, would be ideal for this type of data collection and provide essential data on disparate risk factors facing religious minority and nonreligious populations.

The federal government has the resources and the technical expertise to develop suitable questions for religious data collection on population surveys and other instruments. By working with various organizations representing nonreligious and religious minority communities, we believe that this data collection could be done respectfully and in a way that takes into account the entirely valid concerns that religious minority and nonreligious communities may have regarding confidentiality. We invite the Bureau to connect with us to discuss how we can collaborate to improve religious data collection in ways that respect the sensitivity and importance of these issues.

Conclusion

Atheists and nonreligious people, like other religious minorities, are an under-researched, underserved population in the United States, which continue to face stigma and discrimination because of their nonreligious beliefs. We urge the Bureau to work with nonreligious and religious minority communities to identify ways to increase religious data collection so that we can better understand the disparities faced by these populations. If you should have any questions regarding American Atheists' comments, please contact me at agill@atheists.org.

Very truly yours,



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American Atheists

¹⁴ *Id.*