



Imperial County
Public Health Department

City of Long Beach
Department of Health
and Human Services

Los Angeles County
Department of Public Health

Orange County
Health Care Agency

City of Pasadena
Public Health Department

Riverside University
Health System - Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human
Services Agency

County of San Luis Obispo
Public Health Department

Ventura County
Public Health

May 28, 2024

Sheleen Dumas, Department PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
Commerce Department
1401 Constitution Avenue NW
Washington, DC 20230

RE: 2024 American Community Survey (ACS) Sexual Orientation and Gender Identity Test (ICR Reference No. 202404-0607-003, OMB Control No. 0607-0936)

Dear Ms. Dumas,

The [Public Health Alliance of Southern California](#) (Public Health Alliance) respectfully submits the following comments on the 2024 American Community Survey (ACS) Sexual Orientation and Gender Identity Test released for public comment by the U.S. Census Bureau and Department of Commerce in 2024. The Public Health Alliance is a coalition of eleven local health departments in Southern California. Together, our members have a statutory responsibility for more than 60 percent of California's population. Our mission is to mobilize the transformative power of local public health for enduring health equity.

We commend the Census Bureau's efforts to test questions on Sexual Orientation and Gender Identity (SOGI) to inform recommendations for potential production ACS implementation of these questions. Our member local health departments rely on ACS data for population denominator values to calculate rates of morbidity and mortality. Currently, population denominator values for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex (LGBTQI+) populations are scarce, especially at fine geographic scales such as place or census tract. This prevents local health departments from calculating rates stratified by SOGI for important health outcomes, such as MPOX, and hinders the development of appropriate, effective, and culturally informed intervention strategies.

The Public Health Alliance specifically supports three aspects of the 2024 SOGI test for the 2024 ACS: 1) Utilization of a two-step measure for collecting gender identity data; 2) Addition of an open-ended write-in question to gather additional information about a person's SOGI; and 3) Release of evaluation reports following implementation and analysis of the test.

Utilization of Two Step Measure: We support the proposed two-step measure for collecting gender identity data. This follows existing best practices recommended by the National Academies of Sciences, Engineering and Medicine (NASEM) [report on Measuring Sex, Gender Identity, and Sexual Orientation](#), the



University of California Los Angeles' [Williams Institute](#), the [Fenway Institute](#), the University of California San Francisco's [Center for Excellence in Transgender Health](#), and the [World Professional Association of Transgender Health](#). Compared to a one step measure, the proposed two step measure will support detailed and disaggregated reporting of gender minorities. These detailed gender reporting categories will support the identification of health disparities in gender minority subgroups that experience unique health risks and allow local health jurisdictions to craft tailored interventions to reduce health disparities.

Addition of Open-ended Question: The Alliance also supports adding an open-ended write-in question to gather additional information about a person's sexual orientation and gender identity response options for research purposes. This will allow for frequent write-in responses to be considered as additions to the final list of response options in the production ACS and increase the diversity of response options. Write-in response options will also allow the Census Bureau to evaluate future changes in terminology used to describe sexual orientation and gender identity and add additional response options to address these changes over time.

Release Evaluation Reports: Finally, the Alliance welcomes the Census Bureau's commitment to releasing evaluation reports following the implementation of the 2024 ACS test. The results of this test will serve to strengthen the evidence for current best practices and answer critical questions that remain on how best to ask and confirm SOGI information. These reports will help local health jurisdictions craft better question stems and response options for SOGI and help them better understand and serve their communities.

Overall, the Public Health Alliance approves of the Census Bureau's 2024 American Community Survey Sexual Orientation and Gender Identity Test, as the recommended changes will increase the availability of detailed and accurate SOGI data that is essential to advance health equity. Thank you for your time and consideration, and please feel free to contact us to discuss these recommendations further.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy Delaney".

Tracy Delaney, PhD
Founding Executive Director
Public Health Alliance of Southern California
tdelaney@phi.org

A handwritten signature in black ink, appearing to read "Kim Saruwatari".

Kim Saruwatari, MPH
Public Health Director
Riverside University Health System – Public Health
KSaruwatari@ruhealth.org