



5/29/2024

U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Re: OMB Control Number 0607-0936: 2024 American Community Survey (ACS) Sexual Orientation and Gender Identity Test

Via: <https://www.reginfo.gov>

Dear Director Santos:

Founded in 2021, Citizens Defending Freedom ("CDF") is a non-profit organization that strategically employs county-level chapters across America to help citizens fight for transparency and accountability in local government and schools. We also work to safeguard the constitutional rights of citizens from any and all infringements upon their civil liberties pertaining to speech, safety, moral conscience, and religious expression, among others.

In furtherance of this mission, CDF opposes **any** forthcoming implementation of the costly proposed changes to the U.S. Census Bureau's American Community Survey (ACS) which would add "gender identity" to the demographical information collected, including the current year of 2024 or any year hereinafter.¹ As the ACS is sent to approximately 3.5 million households per year, the collection of these statistics would legitimize the erroneous idea that gender identity is separate from biological sex and therefore, fluid, malleable, and ever changing.²

Moreover, as the ACS seeks to gather this data from anyone over the age of 15, this is especially problematic considering the recent release of a landmark 15-year study that revealed that most adolescents under the age of 18 outgrow confusion around gender identity, with roughly the 11

¹Beyond its social costliness, the price associated with implementing these changes to the ACS is \$10 million per Exhibit 3, page 13, of the U.S. Census Bureau's Budget Fiscal Year 2023, available [here](#).

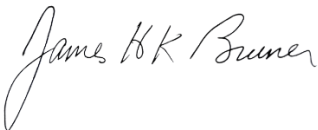
²U.S. Census Bureau. Top Questions about the Survey, available [here](#).

percent analyzed who expressed "gender non-contentedness" dropping to just 4 percent by the age of 25.³ Additionally, in a report titled "Rapid Onset Gender Dysphoria: Parent Reports on 1655 Possible Cases," authors Dr. Michael Bailey and Suzanna Diaz found that the phenomenon of "rapid onset gender dysphoria" in adolescents may be attributed to the social contagion view on gender identity whereby young people are more inclined to assert a gender identity that differs from biological sex on the basis of cultural pressure or influences.⁴

For this reason, as Senators Rubio and Vance pointed out in a letter addressed to you on November 2, 2023, the politicized promulgation of this concept by the U.S. Census Bureau may be construed to constitute an endorsement of this belief from the federal government, something which would jeopardize the integrity of the agency altogether given the statistical unreliability associated with asserting a gender identity separate from biological sex.⁵ However, as the Senators suggest, in the alternative of obtaining this data, the U.S. Census Bureau could instead request a response on the subject of gender dysphoria and whether any of those who complete the survey, including proxy reporters, have suffered from this experience. Given that those who experience gender dysphoria are more likely to experience psychological distress⁶, collecting this information could better advance the ACS's objective to "generate data that help[s] determine how more than \$675 billion in Federal and state funds are distributed each year" in the form of improving access to and distribution of mental health services aimed at assisting gender confused populations.⁷

Thank you for your careful and thoughtful attention to this matter in further deliberation of the implementation of these changes.

Respectfully signed,



Director for Florida Office of Legal Affairs



Law and Policy Specialist

³Rawee, P., Rosmalen, J. G. M., Kalverdijk, L., & Burke, S. M. (2024). Development of Gender Non-Contentedness During Adolescence and Early Adulthood. *Archives of sexual behavior*, 53(5), 1813–1825. <https://doi.org/10.1007/s10508-024-02817-5>

⁴Michael Bailey and Suzanna Diaz (2023). Rapid-Onset Gender Dysphoria: Parent Reports on 1,655 Possible Cases. *Researchers.One*. <https://researchers.one/articles/23.10.00002v1>

⁵U.S. Senate. (2023). Senator Rubio and Senator Vance Letter to Director Santos on Proposed Census Changes, available [here](#).

⁶Hajek, A., König, H. H., Blessmann, M., & Grupp, K. (2023). Loneliness and Social Isolation among Transgender and Gender Diverse People. *Healthcare (Basel, Switzerland)*, 11(10), 1517. <https://doi.org/10.3390/healthcare11101517>

⁷U.S. Census Bureau. American Community Survey, available [here](#).