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The National Coalition for Latinxs with Disabilities (hereinafter “CNLD”, the Spanish language acronym for Coalición Nacional para Latinxs con Discapacidades) appreciates the opportunity to respond to: the Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; U.S. Census Bureau’s (Census Bureau) and the Department of Commerce request for comments on the 2024 American Community Survey (ACS) Sexual Orientation and Gender Identity (SOGI) Test (OMB Control Number: 0607–0936 and ICR Reference Number 202404-0607-003).

CNLD is comprised of Disabled Latinx professionals, family members, and allies in the US and Puerto Rico who are committed to working towards creating a society in which the human rights of Latina/o/xs with Disabilities are upheld, and all their intersecting identities are embraced. Our following comments are informed by the perspectives of Latina/o/xs people with disabilities, lesbian, gay, bisexual, transgender, and queer or questioning (LGBTQI+), academics, advocates, allies, and research and informational reports on the disability and the LGBTQI+ communities. CNLD is encouraged by the development and the appropriate testing of the SOGI test as there is a need for population level identification of the Latina/o/x, disability and LGBTQI+ underserved groups – especially at the intersection of these communities.

Using the past ACS cognitive testing feedback for other questions to be added to the Census and the ACS and lessons learned, we are calling for an expansion of the testing to include native Spanish language speakers outside of Puerto Rico so that significant test results can be achieved across the United States. In addition, we may be amiss, but we do not see how the Deaf and Hard of Hearing communities are being included in the different test variations of paper, internet and telephone/cell testing as the 2024 ACS SOGI test is to be used to evaluate the quality of data from questions on sexual orientation and gender identity that if finalized to be added to the ACS will have implications to intersecting pluriverse communities. We suggest taking appropriate steps to include deafblind individuals. Their unique needs as both visually and hearing impaired makes their intersectional features of special significance, particularly among Spanish native language communities within U.S. contexts where their cultural, linguistic and educational marginalization is often flagrant.

Lastly, we ask that there be additional assistance and marketing that is culturally language competent to the public to understand the need and rationale for the inclusion of the LGBTQI+ questions by engaging in educational outreach and encouraging accessible responses.

Thank you for the opportunity to comment on the 2024 American Community Survey Sexual Orientation and Gender Identity Test.