

Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Commerce Department

RE: High Frequency Surveys Program/Household Trends and Outlook Pulse Survey (*OMB Control Number: 0607-1029*)

Dear Sheleen Dumas,

This comment is submitted on behalf of individuals committed to supporting evidence-based research and policy to advance equity for LGBTQI+ people in the United States. We understand the value of high quality, federally collected data from nationally representative surveys and appreciate the opportunity to comment on the Federal Register Notice (FRN) regarding the next phase of proposed changes to the U.S. Census Bureau Household Pulse Survey (the “Pulse Survey”) through the Household Trends and Outlook Pulse Survey (HTOPS).

Importance of the Household Pulse Survey in Advancing Understanding of LGBTQ+ People and Their Lives

In July 2021, the Census Bureau added questions about sexual orientation and gender identity (SOGI), marking the first time a Census Bureau-sponsored survey included these demographic measures. The inclusion of these questions has significantly enhanced the ability of policymakers, researchers, and advocates to examine the economic and health experiences of LGBTQ people. The survey's frequency and scope have made it an invaluable resource for capturing real-time data about the challenges faced by these communities, especially in the context of the pandemic and its aftermath.

Civil society organizations, academic researchers, and federal agencies¹ have leveraged HPS data to inform federal and state recovery planning and to generate research on critical issues such as food insufficiency, housing insecurity, and economic hardships disproportionately affecting LGBT populations.² These insights have shed light on the persistent disparities between LGBT and non-LGBT individuals, highlighting areas where targeted interventions are necessary. Furthermore, including SOGI measures on a large-scale instrument like the HPS allows for data disaggregation,

¹ [Census Bureau explores sexual orientation and gender identity; Examining Housing Experiences by Sexual Orientation and Gender Identity | HUD USER.](#)

² [Economic Vulnerability of Sexual Minorities: Evidence from the US Household Pulse Survey - PubMed \(nih.gov\); The COVID-19 Impact on Employment for LGBT Individuals With Disabilities: An Examination of the 2021 Household Pulse Survey - Chris R. Surfus, 2023 \(sagepub.com\); Exploring LGBTQ+ and Disaster Data within the US Census Bureau Household Pulse Survey | School of Social Ecology \(uci.edu\)RELEASE: For LGBT Communities, Higher Rates of Economic Insecurity and Labor Market Gaps Persist Despite Robust US Recovery - Center for American Progress; New U.S. Census Bureau data show significant economic disparities among the LGBTQ+ community - Equitable Growth; NWLC Pulse Week 63FS; Wellbeing Among Transgender People During the COVID-19 Pandemic; LGBT Poverty in the United States; LGBT Food Insufficiency During the COVID-19 Pandemic; COVID and the LGBTQI+ Movement in 2022 and 2023; A picture of LGBTQ+ Minnesotans, Part 3: LGBTQ+ adults in the Household Pulse Survey | MN Compass.](#)

enabling researchers to analyze outcomes for specific subgroups, such as those living at the intersections of race, ethnicity, and sexual orientation or gender identity. This granular approach to data collection is essential for designing policies and programs that advance equity and improve the well-being of LGBTQ communities.

Proposed Changes Have Implications for Utilizing Census Data for Examining LGBTQ+ Populations

The proposed changes shared during the Fall 2024 Census Scientific Advisory Committee meeting are significant and have implications for utilizing these data to identify and examine the experiences of underserved communities, including LGBTQ respondents. This is especially true for examining the population by state or smaller geographic areas or the experiences of various subpopulations of LGBTQ people, including those with disabilities, people with children in their home, and people of color.

Moving from waves with unique respondents in each way to a longitudinal panel complicates the possibility for analyses of pooled data, which is often useful for studying small populations because it allows for increasing sample sizes. Currently, pooling of data across the Household Pulse cycles has produced large enough sample sizes to perform deeper in-group analyses, such as to examine the experiences of Black LGBT people compared to their white peers. The inability to do this through HTOPS is a substantial loss given the current lack of SOGI questions on other large surveys conducted by the Census Bureau such as the Current Population Survey or the American Community Survey.

At the same time, the transition to a panel offers the opportunity to conduct longitudinal research, examining changes over time for respondents on key indicators of economic security, among others. There are very few surveys, especially among surveys conducted by the Census Bureau or the federal government more broadly, that allow for such examination. Additionally, the anticipated higher response rates and improved representativeness in the new approach will help meet the need for more accurate, high-quality data about the country's populations. We urge the Census Bureau to continue to ask demographic questions on HTOPS that have historically been included in HPS, including SOGI. Including these measures repeatedly during the panels will allow for better understanding the relevance of changes to LGBTQ identification to economic security, health, and other outcomes over time.

Additionally, we hope that as the sample is replenished, attention will be paid to oversampling of small populations, including for race and ethnicity, sexual orientation and gender identity, and geographic diversity. Other surveys take such an approach in their sample replenishment including the University of Michigan Health and Retirement Study, the National Crime Victimization Survey, and the Medical Expenditure Panel Survey. Replenishment in this way with targeted oversampling would allow new and older respondents to be combined to create larger samples for analysis, which is critical for examining groups with smaller underlying population sizes.

Thank you again for the opportunity to comment on the proposed changes. Please contact Naomi Goldberg (naomi@mapresearch.org) with any questions or if we can provide additional information.

Sincerely,

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