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Via regulations.gov and email

RE: Agency Information Collection Activities; Comment Request; 2025 National Survey of College Graduates **(FR Doc. 2024-19850)**

Dear NSF, Census/DSMD, and OMB Officials,

Thank you for the opportunity to comment on the National Science Foundation's (NSF) National Center for Science and Engineering Statistics' (NCSES) proposed information collection request related to the 2025 National Survey of College Graduates (NSCG). See 89 FR 71938 (September 4, 2024). My comments today follow an extensive line of public comments over the past six years requesting the inclusion of sexual orientation and gender identity (SOGI) questions on NCSES' surveys, including the 2019, 2021, and 2023 NSCG cycles. At times these previous comments were submitted on behalf of 17 major scientific organizations and NSF stakeholders such as the American Association for the Advancement of Science (AAAS), and at other times on behalf of 1,700 scientists including Nobel laureates, members of the National Academies, university officials, and a broad range of constituents across the U.S. scientific workforce.

This public comment addresses critical errors made by Census Bureau's Demographic Statistical Methods Division (DSMD) and NCSES that led to the unwarranted rejection of a sexual orientation (SO) item from the 2023 cycle; the ensuing misrepresentations and withholding of these errors from the public and Office of Management and Budget (OMB); how to avoid repeating these errors and the scientific basis for now adding a SO item; and a request that OMB require all 2023 NSCG analyses/reports be posted with the 30-day FRN.

Key Points

I. Census/DSMD and NCSES Recognized Major Scientific Errors Before OMB Approval But NCSES Knowingly Withheld These Errors from OMB and the Public; OMB Should Require NCSES to Post All Relevant 2023 NSCG Analyses/Reports from Census (Whether Preliminary or Final) With the 30-Day FRN

II. A Sexual Orientation Item Should Be Added to the 2025 NSCG and Should Have Been Added Two Years Ago; Census/DSMD and NCSES Should Adhere to Accepted Scientific Practices and OMB Statistical Standards in Calculating Breakoff Rates and Drawing Valid and Appropriate Comparisons for SOGI Items

III. Observing a Significant Response Order Effect for Sexual Orientation in the 2023 NSCG Bridge Panel Is Extremely Unlikely; Regardless, an Order Effect Would Not Justify Excluding the Item on the 2025 NSCG

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Background

After publicly committing to explore SOGI questions in 2018, NCSES delayed the testing for several years. When NCSES finally sought OMB clearance to initiate a field test as part of the 2021 NSCG bridge panel used for testing survey changes (*n* = 5,000), it initially omitted SO but re-included it following public outcry reported in *Science*. This suggested that while NCSES was somewhat willing to explore a gender identity (GI) item for its surveys, it had a predisposition against SO and never had any genuine intention of adding a SO item. When NCSES completed the 2021 NSCG field test, it submitted to OMB that SO will be excluded because the item's paradata – most notably breakoff rate, but also completion time and changed-answer rate – were worse than for GI. However, what few data NCSES indirectly made available at the time suggested that the paradata metrics for SO were actually on par or even quite superior to other sensitive demographic items long included on NCSES surveys, such as disability, salary, or income.

After 1,700 researchers called out NCSES on what appeared to be scientific misrepresentations to avoid adding SO to its surveys, public attention ensued in *Science* and *Nature* which then resulted in a call from 18 Senators that NSF collect SOGI data as soon as possible. When pressed by *Science*, NCSES committed to make details of its findings available to the public to restore trust and confidence in its SOGI efforts "within the year [2023]". In April 2023, in its revised and final Supporting Statement, NCSES expanded the justification of its decision to exclude SO, stating that SO's breakoff rate was unusually high, "*exceed[ing] the rate for over 90% of the questions on the production survey*" (i.e., at the 90th percentile). In a letter co-signed with AAAS in August 2023, we again formally requested that NCSES make details of its findings publicly available. As NCSES did not do so and continued its lack of scientific transparency, the findings were then requested via the Freedom of Information Act (FOIA), which revealed major scientific errors.

In 2021 NCSES had also launched an additional non-probability study (*n* = 2,800) on Amazon Mechanical Turk (MTurk) to explore MTurk as a cheap survey platform and additionally test questions of interest to the FCSM SOGI Research Group. The MTurk study was intended to be purely exploratory and advance the government's broader efforts with SOGI measurement. Although NCSES did not mention this study in its initial December 2022 justification to OMB for rejecting SO, when later defending its decision in its revised April 2023 justification (where it added the 90th percentile claim; see above), the agency also added that a response order effect in this MTurk study raised additional data quality concerns. The agency concluded that the SO item tested (the simple OMB-recommended design with 4 response options), which has been used in federal population surveys for over 10 years, raised concerns about accuracy that also was now preventing NCSES from moving forward with SO. However, there were significant methodological issues with this MTurk study, formally shared with NCSES on January 13, 2023 and March 3, 2023. See Section III.

Together, on the basis of these results, NCSES decided to add a GI item to the 2023 NSCG production survey. Following the public controversy in January 2023, NCSES decided to continue testing a SO item by running a split-panel design in the 2023 NSCG bridge panel to further explore the response order effect obtained from the flawed MTurk study. Now, for the 2025 NSCG, NCSES must decide whether after 7 years it finally deems the OMB-recommended SO item acceptable for inclusion in the NSCG production survey. NCSES will be using analyses from Census/DSMD to inform its decision-making.

I. Census/DSMD and NCSES Recognized Major Scientific Errors Before OMB Approval But NCSES Knowingly Withheld These Errors from OMB and the Public; OMB Should Require NCSES to Post All Relevant 2023 NSCG Analyses/Reports (Whether Preliminary or Final) With the 30-Day FRN

NCSES never intended to genuinely consider adding a SO item to its surveys of the scientific workforce such as the NSCG, unless and until the American Community Survey (ACS) did or NCSES were required to do so by an OMB policy directive. NCSES does not engage with SOGI experts (it sends one individual to the FCSM SOGI Research Group, who is not a subject matter expert), nor does Census/DSMD have SOGI subject matter experts. Census/DSMD has expertise in paradata analyses and had previously conducted paradata analyses for SOGI questions for the National Center for Education Statistics' (NCES) 2022 National Teacher and Principal Survey (NTPS) Teacher Questionnaire. Strangely, these prior NTPS analyses on SOGI were

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used as a critical benchmark for the NSCG's SOGI analyses, although this comparison has numerous scientific problems and was never officially disclosed. Census/DSMD officials made what appear to be honest (albeit highly negligent) mistakes in analyzing SOGI paradata for NCSES, which they later realized themselves but which neatly fed into NCSES' predisposition to avoid adding a SO item regardless.

On September 21, 2022, in Census/DSMD's preliminary findings presentation (see Appendix), Census/DSMD told NCSES that the "SOGI series of questions does not appear to be problematic for respondents" and that adding SOGI questions to the 2023 NSCG production survey would "have limited risk". It did note that SO's paradata were marginally worse than GI's paradata, as SO "took longer to complete, had a higher percent of changed answers, and was responsible for all of the breakoffs on [the SOGI] screens". But it compared SO to a question of similar length and number of response options (mother's education), which had a similar completion time and changed-answer rate as SO. The final bridge panel report was clear that both SO and GI items elicited equally higher completion times and changed-answer rates relative to a conventional sex question, but that this "*was expected since they contain more response options, and response options with terms respondents may not be familiar with yet*". This left SO's "breakoff rate" of 2.0% (albeit using a flawed metric; see below) as the only real concern. So while in the presentation Census/DSMD concluded that adding SO would not be problematic, it also indicated that "there would be even less risk" without SO given the paradata were marginally worse (but mostly expectedly so), although cautioned NCSES should consult with SOGI subject matter experts (see Timeline; Appendix).

By January 2023, these Census/DSMD observations had morphed into an unequivocal recommendation that NCSES exclude a SO item from the 2023 NSCG. It is likely that this occurred because 1) in the discussion on September 21, 2022, NCSES likely conveyed, either directly or indirectly, its longstanding reluctance toward a SO item; and 2) Census/DSMD learned one month prior that NCSES decided to officially reject the SO item from the 2023 NSCG, so Census/DSMD aligned its recommendation to fit the sponsor/funder's wishes and their final decision. After considerable public scrutiny in January 2023, by February 2023 Census/DSMD officials were now recognizing major scientific errors in their recommendation to exclude SO and had a meeting with NCSES to convey these concerns. Census/DSMD officials were concerned that "*when we originally gave [NCES] recommendations [about the NTPS], we said go ahead. We think it'd be fine to use the [SOGI] questions. Now that we've looked at [the NSCG], if [we] go back to [the NTPS] then their unweighted [paradata] numbers actually look worse and we said to use it. So [we're] worried about the conflict[ing] information. The [SOGI] questions don't seem to be an issue [in the NSCG]. The [paradata] results were unweighted and it just didn't look problematic but if we dig deeper, the [NTPS] results are very similar to [the NSCG]*". These officials were also concerned that "*In our original preliminary results [for the NSCG], we phrased it as [NCSES] 'could' do xyz. Whereas, when it got to the report it got morphed into a more definitive recommendation*" – a recommendation they appear to now effectively recant (see Appendix).

Despite NCSES now knowing that there was no genuine issue with SO's breakoff rate and Census/DSMD had made significant errors, NCSES nevertheless continued to convey to the public – through the NSF Director's February 2023 letter and its own OMB-approved April 2023 letter – that the agency still must figure out ways to reduce SO's breakoff rate through further research. As NCSES was facing public controversy with a letter from 1,700 scientists alleging scientific misrepresentation, a call from 18 US Senators, and negative attention in *Science* and *Nature*, they faced "a lot of encouragement" from OMB to publicly release their SOGI findings (and OMB had an urgent meeting with NCSES on January 17, 2023 to understand how SO's breakoff rate fit with the full distribution of items; see Timeline; Appendix). In January 2023, NCSES told *Science* they would release the findings before the end of 2023, the NSF Director said they would release the findings by March 2023, and in April 2023 NCSES said they would release the findings "in the next couple of months". After learning about the critical scientific errors and that Census/DSMD effectively recanted their recommendation about SO unofficially, NCSES nevertheless submitted the final Census/DSMD report to OMB without any correction or qualification; OMB approved the decision on April 20, 2023 which NCSES now knew had no scientific basis; and OMB approved NCSES' official response to the 1,700 scientists that informed the public that there were still issues with SO's breakoff rate the agency must further investigate.

Despite all the promises for publicly releasing 2021 NSCG data, NCSES never released any data by the end of 2023. NCSES was told by Census/DSMD twice – once on January 7, 2023 and another time on April 17,

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2023 – that it could freely post the final report to its website or disseminate publicly. By January 2024, now with a pending FOIA request, a NCSES official told a senior NSF official inquiring about the FOIA request that to fulfill the request NCSES must first obtain Census approval to release the report, which it had been having difficulty doing, and that Census may even deny NCSES' request to release the report (see Timeline), all of which was knowingly false. After reaching out to Census/DSMD myself, it became clear that no Census approval was needed, and Census/DSMD thereafter worked with NCSES to release the report.

In short, NCSES' longstanding evasiveness against genuinely considering a SO item for its surveys, coupled coincidentally with significant scientific errors made by Census/DSMD, led NCSES to then knowingly misrepresent its findings to OMB and the public on multiple occasions for over two months before OMB approval. It then obstructed federal guidelines of scientific integrity and transparency, as well as the interests of OMB, senior NSF officials, NSF stakeholders, and the public, by evading the release of the data, going so far as appearing to evade a FOIA request despite knowing for nine months it was able to release the report.

NCSES' lack of transparency and obstruction of scientific oversight from OMB only appears to continue. OMB indicated in its May 2024 clearance terms for the 2025 Survey of Earned Doctorates (SED) that OMB "strongly encourages NCSES to make the [SOGI] pilot data available to the public under controlled settings such as through their secure research enclave". The public has inquired from NCSES licensing officials multiple times since July 2024 as to whether NCSES plans to make the aggregate paradata that informed its SOGI decisions (not even the microdata that would raise more disclosure concerns) available to the public. While the licensing officials indicated they were beginning discussions with more senior NCSES officials, at a certain point these senior officials clearly told the licensing officials to stop any further discussion.

As NCSES and Census/DSMD have now created a crisis of public confidence, OMB should provide the necessary scientific oversight for the 2025 NSCG. This should include: (a) engaging SOGI measurement experts and/or paradata experts to evaluate the scientific recommendations below and, where OMB agrees, require scientific accountability from NCSES; and (b) require that all relevant Census/DSMD presentations/reports (e.g., the 2023 NSCG Bridge Panel Preliminary Findings), whether in preliminary or final form, be posted on with the 30-Day FRN for the public to be able to provide feedback. Census/DSMD can only provide NCSES with materials that are approved by Census' Disclosure Review Board (DRB). Thus, whatever data/information NCSES has access to for making its SOGI decisions at the 30-Day FRN will have already been approved for release by Census' DRB and can easily be posted publicly on RegInfo.Gov.

II. A Sexual Orientation Item Should Be Added to the 2025 NSCG and Should Have Been Added Two Years Ago; Census and NCSES Should Adhere to Accepted Scientific Practices and OMB Statistical Standards in Calculating Breakoff Rates and Drawing Appropriate Comparisons for SOGI

Census/DSMD and NCSES made several significant errors in its SOGI paradata analyses for the 2021 NSCG bridge panel, which should be avoided in its forthcoming analyses for the 2023 NSCG bridge panel that will inform their decision to add a SO item to the 2025 NSCG production survey. The errors are:

- SOGI items were not benchmarked against other comparable sensitive items, which is standard scientific practice and would have shown the SO item performed very well with a near-average breakoff rate
- An unconventional and flawed metric dramatically inflated SO's apparent breakoff rate
- Weighted paradata in the NSCG were unofficially benchmarked against unweighted paradata in another survey Census/DSMD was assigned (NTPS) despite this comparison being deeply flawed

SOGI items were not benchmarked against other comparable sensitive items, which is standard practice and would have shown the SO item performed very well with a near-average breakoff rate

As mentioned earlier, NCSES told OMB that SO should be excluded because the item's paradata – most notably breakoff rate, but also completion time and changed-answer rate – were worse than GI. In other words, Census/DSMD benchmarked SO's paradata against that of GI. The GI question performed extremely

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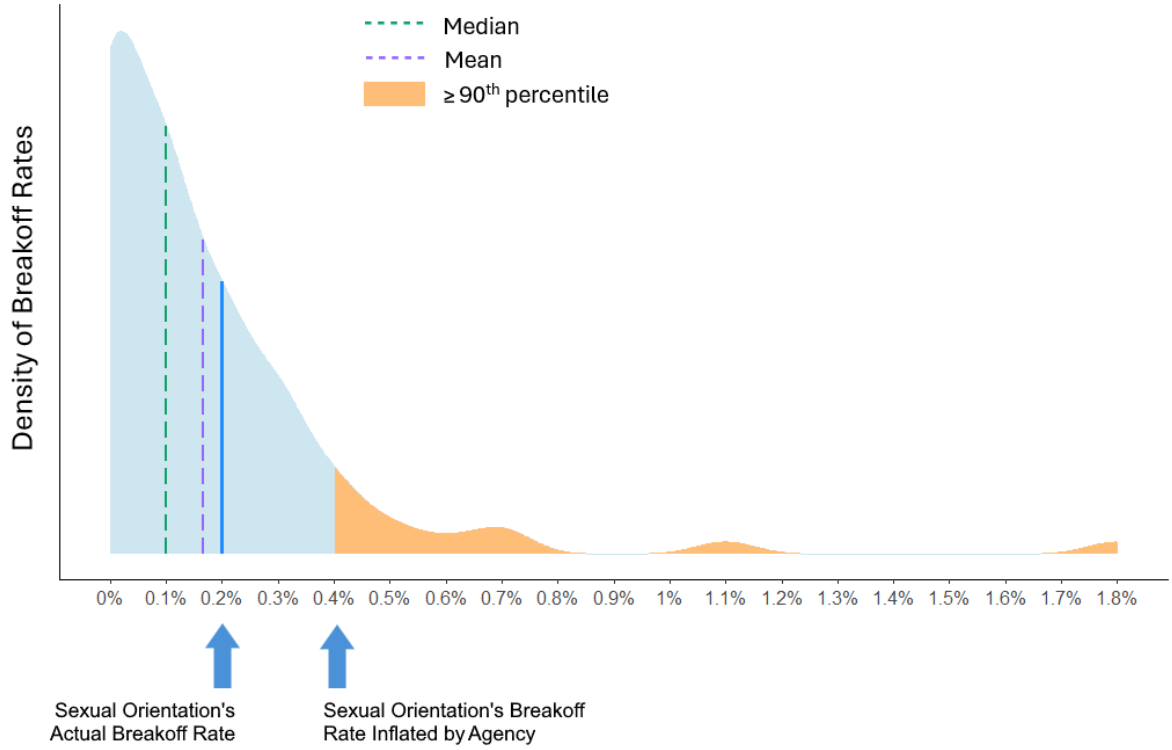
well with a breakoff rate of 0%. SO had a true breakoff rate of 0.2% (i.e., 0.2% of respondents exited the survey when asked the SO question), which was quite low and only marginally higher than GI. The benchmark of a new sensitive item such as SO should be other comparably sensitive demographic items (e.g., disability, income, and salary), consistent with various precedents of other federal statistical agencies, such as NCES, and as implied by OMB's guidance (see p. 3). This is also what Census has indicated it plans to do for the upcoming American Community Survey (ACS) SOGI Testing.

As now revealed by FOIA, the breakoff rate for SO (0.2%) was actually equivalent to disability (0.2%) and salary (0.2%) questions, and was far lower than the income question (0.5%). There is no scientific precedent for using this double standard in evaluating SOGI questions. Unless Census/DSMD and NCSES wish to benchmark the breakoff rates of income, salary, or disability against 0%, then they should not have benchmarked SO against 0% either. The approach is also inconsistent with the agencies' own analyses of other related metrics. In evaluating nonresponse rates, it was stated that "*[f]or comparison, we calculated item nonresponse rates for two other sensitive questions*", namely income and salary. Because SO's nonresponse rate (2.1%) was better than income (7.0%) and salary (5.1%), it was concluded that on this metric the SO item performed within acceptable range. Rather than taking this identical approach with breakoff rates, the agencies conducted a flawed analysis that led to an unwarranted rejection of SO.

As for completion times and changed-answer rates, even in the bridge panel report the agencies concluded that these two metrics were equally high for SO and GI and were unremarkable given the number of response options provided for these questions, which is inconsistent with NCSES' characterization to OMB.

Breakoff rates ("BR") across all 102 available items on the production survey were recently obtained via FOIA (see table, next page). Stunningly, there were 39 questions that led respondents to break off at an equal or higher rate than SO (≥0.2%), and the mean breakoff rate was 0.17%. SO's breakoff rate was at the 63rd percentile, far from the 90th percentile claimed (see figure below). Thus, the SO item performed excellently not only in comparison to other sensitive items but also relative to the entire survey, with a near-average breakoff rate. For the 2023 NSCG bridge panel, SO's paradata should be compared to disability, income, and salary, as well as the full distribution of items, rather than benchmarked against GI.



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Item	Breakoff Rate (BR)	Share of Total Breakoffs (STB)
B_FSINTRO	0.0%	0.0%
B_SALEFF	0.0%	0.0%
B_SPOWK	0.0%	0.0%
B_WASEC	0.0%	0.0%
OTHER_CERT	0.0%	0.0%
RACEINTRO	0.0%	0.0%
B_CTZDUAL	0.0%	0.1%
B_DIFAGE	0.0%	0.1%
B_GENDER	0.0%	0.1%
B_GRFINTRO	0.0%	0.1%
B_VETSTAT	0.0%	0.1%
B_WTREASN	0.0%	0.1%
LOGIN	0.0%	0.1%
N_ASDGRI	0.0%	0.1%
N_DGCHK2	0.0%	0.1%
B_CLICNOW	0.0%	0.2%
B_JOBSATIS	0.0%	0.2%
B_MARSTA	0.0%	0.2%
B_WAPRI	0.0%	0.2%
ENROLLED	0.0%	0.2%
N_MRDG	0.0%	0.2%
N_NMRMEDX	0.0%	0.2%
SUP	0.0%	0.2%
B_CTZUSIN	0.0%	0.3%
B_ERNCOV1	0.0%	0.3%
B_HRSWK	0.0%	0.3%
HISPCAT	0.0%	0.3%
N_BTHSTV	0.0%	0.3%
N_DGCHK	0.0%	0.3%
N_EDDAD	0.0%	0.3%
N_EDMOM	0.0%	0.3%
N_MRMVI	0.0%	0.3%
WEEKS_YEAR	0.0%	0.3%
B_CHLVIN	0.0%	0.4%
B_FTPRET	0.0%	0.4%
B_SUPWK	0.0%	0.4%
N_COMCOLI	0.0%	0.5%
B_CMINTRO	0.1%	0.1%
B_N2OCLSTX	0.1%	0.2%
B_CHTOT	0.1%	0.3%
B_WTRINTRO	0.1%	0.3%
N_NMRMEDX2	0.1%	0.3%
B_EMSMI	0.1%	0.4%

Item	Breakoff Rate (BR)	Share of Total Breakoffs (STB)
B_N2OCPRX	0.1%	0.4%
N_CSINTRO	0.1%	0.4%
N_D2	0.1%	0.4%
B_GOVSUP	0.1%	0.5%
B_GRLOANOWE	0.1%	0.5%
B_TELEW	0.1%	0.5%
B_WRKGP	0.1%	0.5%
N_HSYR	0.1%	0.6%
B_SALCOV1	0.1%	0.8%
B_MGINTRO	0.1%	0.9%
B_OCPRT	0.1%	0.9%
B_WKTRNI	0.1%	0.9%
CERT_LICENSE	0.1%	0.9%
N_BSDGRI	0.1%	0.9%
B_NEDTP	0.1%	1.0%
N_HSSTV	0.1%	1.0%
B_EMMAIN	0.1%	1.1%
B_RESIDE	0.1%	1.1%
B_UGLOANOWE	0.1%	1.3%
B_UGFINTRO	0.1%	1.4%
B_LWEV	0.2%	0.2%
B_ERNDEC	0.2%	0.5%
B_WKPROBE2	0.2%	0.6%
B_CLICWKR	0.2%	0.7%
B_N2OCPRX2	0.2%	1.2%
B_SPINTRO	0.2%	1.2%
N_CCINTRO	0.2%	1.2%
B_SATINTRO	0.2%	1.3%
BFTINTRO	0.2%	1.4%
B_SALARY	0.2%	1.5%
B_FACINTRO	0.2%	1.6%
B_DIFALL	0.2%	1.7%
B_STRTDATE	0.2%	1.9%
N_VERIFYACS	0.2%	1.9%
B_VERIFYNAME	0.2%	2.6%
B_WRKG	0.2%	2.8%
N_D3	0.3%	0.2%
FIRST_US_VISA	0.3%	0.3%
PJ	0.3%	0.3%
B_NWRTYR	0.3%	0.5%
B_N2OCLSTX2	0.3%	0.6%
N_CCSCH	0.3%	0.7%
B_LOOKWK	0.3%	1.0%

Item	Breakoff Rate (BR)	Share of Total Breakoffs (STB)
B_CLICINTRO	0.3%	1.1%
N_MRD	0.3%	2.8%
B_CONTACT	0.3%	2.9%
B_VERIFYDOB	0.3%	4.2%
B_SALPROBE	0.4%	0.2%
B_CHINTRO	0.4%	0.7%
B_OCLSTV	0.4%	0.9%
B_NWINTRO	0.4%	1.1%
B_VERIFYNAME	0.4%	2.6%
B_WAINTRO	0.5%	4.0%
B_EARN	0.5%	4.1%
B_LAST_JOB	0.6%	1.7%
B_EARNPRB	0.7%	0.5%
B_OCPRV	0.7%	6.4%
B_EMINFO	1.1%	10.3%
B_VERIFYNAME	1.8%	2.6%
B_ACCEP	(D)	(D)
B_ACINTRO	(D)	(D)
B_CLICNMBR	(D)	(D)
B_ERNINC	(D)	(D)
B_FNCV	(D)	(D)
B_FTPRTYR	(D)	(D)
B_N2OCPRX3	(D)	(D)
B_NACEDX	(D)	(D)
B_NRREA	(D)	(D)
B_PERMVYR	(D)	(D)
B_SALCOV2	(D)	(D)
B_SALDEC	(D)	(D)
B_VSATP	(D)	(D)
N_BSDGN	(D)	(D)
N_CCPRI	(D)	(D)
N_CCSEC	(D)	(D)
N_CMPRI	(D)	(D)
N_D2DG	(D)	(D)
N_D2MIV	(D)	(D)
N_D3DG	(D)	(D)
N_D3MVI	(D)	(D)
N_ND2MEDX2	(D)	(D)
N_ND2NEDX	(D)	(D)
N_ND2NEDX2	(D)	(D)

An unconventional and flawed metric dramatically inflated SO's apparent breakoff rate

Although not disclosed in any public materials with OMB, the agencies had actually calculated two different metrics for breakoff rates: "percent of respondent visits with a breakoff" (# breakoffs at item *x* divided by # respondents who visited *x*) – what I call here an item's actual Breakoff Rate (BR) – and "percent of breakoffs" (# breakoffs at item *x* divided by total # respondents with a breakoff) – what I will call an item's Share of the Total Breakoffs (STB) – despite the agencies ambiguously referring to both these metrics as "breakoff rates". All breakoff rates described in the prior section refer to the conventional BR metric, which is the clear scientific standard. To compare the BR and STB metrics for SO: While 0.2% of respondents exited the survey when asked the SO item (BR), the SO item was responsible for 2.0% of all breakoffs across the survey (STB). See table above for all 102 production items' BR and STB values. While this unconventional STB metric may be valuable in a different use case, such as to identify which existing items in a survey contribute the most breakoffs and thus require further attention, this metric is certainly not appropriate for vetting new survey items or making direct comparisons across items on a survey.

While the BR metric correctly indicates the rate at which respondents exit the survey in response to a question, the STB metric does not focus on the respondent's specific interaction with a question. Instead, questions that have more opportunity for breakoffs (i.e., that more respondents encounter) lead to higher STB values. Questions that appear later in the survey tend to be seen by far fewer respondents due to accumulated breakoffs. Moreover, most items in the NSCG employ a skip logic, such that which respondents visit a given item is contingent on their responses to previous items (e.g., the salary question is only seen by

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respondents who mark being employed), yielding substantial variability in how frequently items are encountered (see histogram). Thus, items with actual breakoff rates (BR) that are quite unremarkable can have a disproportionately high STB simply because many respondents visited the item.

There are well-accepted scientific standards for calculating an item's breakoff rate, where the number of breakoffs at an item should be divided by the number of respondents who encountered that item, i.e., the BR metric (e.g., Peytchev, 2009). This is reflected in Guideline 3.2.6 of OMB's Standards and Guidelines for Statistical Surveys (p. 16): *"Calculate item response rates…as the ratio of the number of respondents for whom an in-scope response was obtained…to the number of respondents who were asked to answer that item*" (while this official guideline specifically describes item response rates, the principle of needing to divide by the number of respondents who were asked to answer an item applies equally to an item's breakoff rate). For example, OMB Statistical Policy Working Paper 47, *Evaluating Survey Questions: An Inventory of Methods* (January 2016), states that: "*Breakoff rates…measure the extent to which a respondent starts the survey but stops providing answers at some point during the survey (Peytchev, 2006). Rates can be measured at the survey (how many respondents broke off from the survey) or at the item level (how many respondents broke off at a particular question)*" (i.e., the BR metric). The STB metric is not mentioned. Moreover, when analyzing SOGI breakoff rates, other agencies such as NCES have only used the BR metric (and do not calculate the STB metric). Finally, when evaluating all other non-SOGI breakoffs in the bridge panel, Census/DSMD and NCSES never calculated the STB metric and only used the conventional BR metric; only when evaluating SOGI items did the agencies use this unconventional STB metric.

Using the STB metric, SO was responsible for 2.0% of all breakoffs in the bridge panel, which is at the 90th percentile when compared to the 102 available questions in the production survey, as NCSES claimed to OMB. Because of the survey's extensive skip logic, only a minority of questions, such as SOGI and disability, were seen by all respondents. Thus, even though SO's true breakoff rate (BR) of 0.2% was quite average, it was inflated considerably when calculated via the STB metric (63rd → 90th percentile) (see figure on prior page). That said, even with the STB metric, SO was generally on par or better than comparable items: Income had a 4.0% STB, disability a 1.7% STB, and salary a 1.5% STB.

The issues with this inappropriate STB metric are further exacerbated by Census/DSMD's undisclosed comparisons with the NTPS. While the scientifically appropriate BR metric allows for meaningful comparisons across items, instruments, and locations in the survey, the STB metric is certainly not appropriate to compare across instruments. This is because the STB metric is extremely dependent on the content of the survey and the frequency with which respondents encounter items. Due to skip logic in the NTPS, of the 89 total items, 21 are visited by all respondents (46%) while 48 are visited only by a subset (54%). However, for the NSCG, of the 109 total items, 24 are seen by all respondents (22%) and 85 are seen only by a subset (78%). Thus, roughly half the questions in the NTPS are seen by all respondents but only a fifth of the questions in the NSCG are seen by all respondents, which includes demographics like SO. This results in the STB metric significantly inflating the apparent breakoff rate of SO in the NSCG, while this inflation is far less severe in the NTPS due to differences in skip logic (besides other major differences in content). None of this would be an issue had the agencies used the standard BR metric and had made internal comparisons within the same instrument to other sensitive items (e.g., disability, salary, income).

In short, the agencies used an inappropriate metric (STB) exclusively for the SOGI analysis without justification, which dramatically inflated SO's reported breakoff rate (STB) to OMB and the public even though the actual breakoff rate (BR) was quite average. Census/DSMD appears to put a priority on the STB metric, which perhaps is valuable for other work that it does. But for vetting new items, particularly sensitive demographic items that tend to be seen by all respondents and yield some breakoffs, it is severely limited.

For the 2023 NSCG bridge panel, Census/DSMD and NCSES should use the standard BR metric, and not the flawed STB metric, in analyzing SOGI breakoff rates. In the 2021 NSCG, to save time Census/DSMD did not calculate paradata for all items in the bridge panel, only the production survey. Instead, in the 2023 NSCG, Census/DSMD should compare SOGI items to other sensitive items (disability, income, and salary), as well as the full distribution of items, in both the bridge panel and new cohort production survey.

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Weighted paradata in the NSCG were unofficially benchmarked against unweighted paradata in another survey Census/DSMD was assigned (NTPS) despite this comparison being deeply flawed

NSCG and NTPS are radically different surveys with largely different content, populations, response modes, among other factors. In addition, the NTPS used the longstanding OMB-recommended SO item (4 options) while the NSCG used an unnecessarily complex SO item (9 options) that has no federal precedent. Census/DSMD officials' undisclosed benchmarking with the NTPS has no scientific basis, and it only occurred because the officials happened to have been assigned to both NTPS and NSCG. Had either Census/DSMD or NCSES substantively engaged with the many SOGI measurement experts inside the government, or outside the government who have repeatedly offered their assistance to NCSES, any of them would have been able to point the agencies in the direction of the standard scientific practice of benchmarking demographics like SOGI against other sensitive items or the full distribution of items.

In the NSCG, Census/DSMD used base weights for all paradata to adjust for the selection probabilities of various demographic categories. For the NTPS, no weighting was ever performed. It is clear that as early as October 2022 (and likely much earlier), Census/DSMD had both unweighted and weighted SOGI data readily accessible. By Census/DSMD officials' own admission in February 2023, they realized they had drawn invalid comparisons between SO's weighted breakoff rate in the NSCG (STB = 2.0%) and SO's unweighted breakoff rate in the NTPS (STB = 1.4%). While the unweighted SOGI paradata from the NSCG are pending release from an ongoing FOIA request, notes from Census/DSMD officials that "[the NTPS] unweighted [paradata] numbers [for SOGI] actually look worse [than the NSCG]" imply that in unweighted form SO was responsible <1.4% of all breakoffs in the NSCG, a value better than the NTPS. This realization led Census/DSMD officials to now understand they erred and that "[SOGI] "questions don't seem to be an issue [in the NSCG]".

Unweighted SOGI paradata should never be compared with weighted SOGI paradata. Even the prospect of weighting SOGI paradata at all can be difficult when considering the response mode of web vs. paper, and it is even more problematic to compare weighted paradata from one survey to unweighted paradata from a different survey when the two surveys have different response modes. The 2021 NSCG bridge panel (n = 5,000) was 100% web respondents, while the 2022 NTPS teacher questionnaire (n = 2,850) was 88% web respondents / 12% paper respondents. Paper respondents tend to skew heavily toward older age groups, non-native English speakers, etc., groups that may find SOGI items more sensitive or difficult than the average respondent. As paradata are only available from web respondents, weighting the paradata can result in groups who are underrepresented in web mode (who may also find SOGI more difficult) disproportionately inflating paradata metrics like breakoff rates. These issues are only further compounded by the priority Census/DSMD puts on the inappropriate share of the total breakoffs (STB) metric discussed earlier. While the standard breakoff rate (BR) metric can be meaningfully compared across instruments, the STB metric is dependent on other items and would be extremely variable across different surveys like NSCG vs. NTPS.

In the 2023 NSCG bridge panel, all comparisons for SOGI paradata should be disclosed and shared with the public. Weighted and unweighted paradata should not be compared. When weighting SOGI paradata, Census/DSMD should ensure groups underrepresented in web mode are not biasing weighted estimates.

III. Observing a Response Order Effect for Sexual Orientation in the 2023 NSCG Bridge Panel Is Very Unlikely; Regardless, an Order Effect Would Not Justify Excluding the Item on the 2025 NSCG

In its 2021 MTurk study (n = 2,800), NCSES sought to explore MTurk as a cheap survey platform and conduct exploratory questions of interest to the FCSM SOGI Research Group. It conducted a split-panel design on a non-probability sample of college-degree holders and randomly varied the order of the response options using the now OMB-recommended SO question design ("Which of the following best represents how you think of yourself?") with gay/lesbian first (gay or lesbian; bisexual; straight, that is, not gay, lesbian or bisexual; something else) or straight first (straight, that is, not gay, lesbian or bisexual; bisexual; gay or lesbian; something else).

NCSES reported a significant difference in gay/lesbian responses due to the two response orders using

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Fisher's exact test, as shown below. NCSES continues to interpret this effect as a genuine issue in how the small gay/lesbian population responded to SO. However, also note below a similarly sized difference in straight responses in the opposite direction, i.e., respondents were 1.7% more likely to select gay/lesbian when it was listed first and were 1.3% more likely to select straight when it was listed first (i.e., common primacy bias). However, because a Fisher's exact test or chi-square test assumes differences between groups are real and unaffected by response bias, a 1.7% primacy bias for a small group like gay/lesbian is detected as significant while a similar 1.3% primacy bias for a large group like straight is not detected.

Sexual Identity	Gay or Lesbian First	Straight First
Gay or lesbian	4.6%	2.9%
Bisexual	7.7%	7.4%
Straight	86.4%	87.7%
Something else	1.3%	2.0%

Now, in the 2023 NSCG bridge panel currently being analyzed, NCSES has continued its exploration of this response order effect by running another split-panel design (n = 5,000) with some modifications in the web-based government survey rather than MTurk: gay/lesbian first (gay or lesbian; straight, that is not gay or lesbian; bisexual; I use a different term [write-in]; I don't know) or straight first (straight, that is not gay or lesbian; gay or lesbian; bisexual; I use a different term [write-in]); I don't know).

In terms of the prior findings, the first critical issue is that these MTurk non-probability data were intended to be used for exploratory purposes only and to incrementally advance government-wide SOGI measurement issues. Such experimental MTurk data are not intended to be used by federal statisticians to vet new items for a survey in this manner. In NCSES' prior public presentations, the MTurk findings were reported to be largely favorable to both SO and GI questions (if anything, more favorable to SO than GI), and NCSES had made no mention that this response order effect obtained was viewed as a critical data-quality concern.

The second issue, as alluded to above, is that the response order effect almost certainly reflects well-established primacy effects on MTurk driven by the NCSES' inadequate data-screening procedures. Primacy effects on MTurk occur when a subset of "bad" respondents rush, take shortcuts, and disproportionately use the first-listed option in a vertically oriented question such as the SO question tested. This primacy bias is well studied by survey researchers and has been documented among MTurk respondents around the world. When "bad" respondents are left in the data, a 1.7% or 1.3% greater likelihood to select the first-listed option in the SO item is fully expected. It is commonplace and even the very first tip that some online survey platforms warn their researchers of. In other words, the MTurk respondents were not confused by the question, as the agency claimed; respondents were being lazy and selecting the first-listed option to rush through the survey and receive payment, as MTurk respondents are known to do. Fortunately, there are easy ways to screen for this behavior, but NCSES did not conduct this crucial screening.

MTurk respondents behave quite differently than respondents in field tests with government surveys, with "MTurkers" characterized by extreme levels of low-effort, careless, and rushed responding. A recent review states: "*MTurkers often complete [studies] in distracting environments and at rapid speed to maximize monetary returns, which translates into about 15% of MTurkers failing attention and compliance checks. MTurkers are less likely to pay attention to study instructions or manipulations, and more likely to engage in insufficient effort or careless responding, as compared with [other] samples.*" When researchers use MTurk, they are expected to abide by guidelines to avoid bias and conduct proper data screening.

The agency excluded only 4.6% of the data, which was due entirely to ineligibility and suspicious IP addresses rather than low-effort screening. It did not require MTurk respondents to have a minimum approval rating, and it did not use any systematic screening criteria to remove low-effort, rushed responders. It is largely expected that MTurk studies discard at least 15% of the data due to standard low-effort screening procedures, including for studies using only high-quality MTurk users. Thus, it is virtually guaranteed that the agency's final MTurk sample still contains a subset of inattentive respondents who

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rushed through the survey and likely exhibited primacy bias – a bias producing what NCSES continues to claim is a real change in how SO was reported.

SOGI experts have conducted similar response order experiments with SO, which across three different samples found no effect of response order. In Saperstein (2024), which was presented to Census in March 2024, respondents were presented with the OMB-recommended SO design ("Which of the following best represents how you think of yourself?") in one of four order conditions: Alphabetical (bisexual, lesbian or gay, straight or heterosexual, I use a different term [write-in]), Low-to-High Frequency (lesbian or gay, bisexual, straight or heterosexual, I use a different term [write-in]), High-to-Low Frequency (straight or heterosexual, bisexual, lesbian or gay, I use a different term [write-in]), or Randomized.

In a Prolific sample (a platform similar to MTurk but with higher quality respondents) similar to NCSES' study but conducted appropriately with proper attention/compliance checks and data screening, as well as made nationally representative with quotas for sex, age and race rather than a simple convenience sample, no order effect was found (see below). The sample was all U.S. adults, rather than only college graduates, but this suggests NCSES' order effect was likely due to primacy bias from inappropriate MTurk data screening.

Prolific (n = 1,497), no order effect, $\chi^2 = 5.91$, $p = .748$:

	Alpha	Low-High	High-Low	Random
Straight	83.83%	83.82%	85.41%	86.54%
Bisexual	10.24%	9.02%	8.11%	7.65%
Lesbian or Gay	3.77%	3.18%	4.32%	3.43%
Different term	2.16%	3.98%	2.16%	2.37%

NCSES' principal concern with its MTurk finding is that the true gay/lesbian population may be misreporting SO, which heavily skews the estimates since it is a small population. If this were true, the order effect should be magnified among gay/lesbian respondents. Saperstein (2024) also conducted the study on two targeted LGBTQ+ adult samples, neither of which showed any effect.

NORC's AmeriSpeak (n = 1,057), no order effect, $\chi^2 = 4.85$, $p = .847$:

	Alpha	Low-High	High-Low	Random
Bisexual	41.70%	39.93%	37.68%	43.36%
Lesbian/gay	36.03%	38.85%	38.41%	35.16%
Straight	12.55%	10.43%	10.14%	10.16%
Write-in	9.72%	10.79%	13.77%	11.33%

Lucid (n = 1,346), no order effect, $\chi^2 = 10.10$, $p = .343$:

	Alpha	Low-High	High-Low	Random
Bisexual	65.41%	66.27%	64.72%	62.08%
Lesbian/gay	27.62%	29.82%	30.32%	31.50%
Straight	1.74%	0.30%	2.04%	0.92%
Write-in	5.23%	3.61%	2.92%	5.50%

Saperstein's (2024) research described above, together with the fact that NCSES' MTurk order effect has the common pattern of primacy bias and NCSES only excluded 4.6% of respondents (implying >10% remaining "bad" respondents who were inattentive/rushing and selecting the first-listed option), suggests the

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prior response order effect is a red herring and will not be replicated in the 2023 NSCG bridge panel. Census/DSMD and NCSES should nevertheless be mindful of potential primacy effects due to inattentive/rushed respondents even on web-based surveys like the NSCG (albeit likely far less than MTurk). They should note that Fisher's exact or chi-square tests are not suited for addressing such response bias issues, as slight biases can be registered as meaningful for small populations (e.g., 1.7% greater likelihood to select gay/lesbian is very significant, but a similar 1.3% greater likelihood to select straight is not).

Finally, the MTurk study was intended to be exploratory and advance federal-wide SOGI measurement rather than confirmatory and used to assess the basic viability of SO for the NSCG. NCSES cherry-picked one seemingly unfavorable finding, the response order effect, from a majority of favorable findings for SO in the MTurk study because it needed excuses to reject SO and never genuinely intended to add the item. Now that the public has created greater scientific accountability for NCSES, and NCSES recently did add SO to the 2025 SED production survey without response order issues ever explored in the SED (or yet being settled here in the NSCG), NCSES' past arbitrary and excessive scrutiny for SO is clearer to see. In reality, demonstrating a lack of order effects was never a fundamental requirement for NCSES' data quality standards (e.g., GI was added to the NSCG without order ever explored; SO was added to the SED without order ever settled). In short, the OMB-recommended SO item tested in the 2023 NSCG bridge panel has been used across the government for over 10 years. The order issue at hand is and always was an exploratory one that should certainly incrementally advance the government's broader SOGI measurement efforts, but regardless of the result should not hinder the immediate addition of SO to the 2025 NSCG cycle.

Respectfully submitted,

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Timeline

Timeline from the last NSCG cycle:

September 21, 2020	NCSES submits to OMB that it will explore a GI item (but omits any discussion of a SO item) on the 2021 NSCG bridge panel used for testing survey changes, despite publicly committing in 2018 to pilot all SOGI items.
December 18, 2020	*Science* reports on the delays and growing frustration with NCSES, including the fact that NCSES is intending to leave out SO from the 2021 NSCG bridge panel. AAAS, the American Educational Research Association (AERA), and I submit two public comments during this time requesting the immediate inclusion of SO in the 2021 NSCG bridge panel testing.
March 29, 2021	Official response from NCSES to our public comments, indicating that NCSES will add SO to the 2021 NSCG bridge panel testing and also launch an additional non-probability sample testing SOGI questions. In conflict with 5 CFR 1320.8(d), NCSES did not allow the public to comment on SOGI question designs or experimental plans in any 60-day or 30-day comment period.
April 6, 2022	Census/DSMD sends NCSES the analysis plan for SOGI questions in the 2021 NSCG Bridge Panel for any feedback. NCSES provides no feedback.
September 21, 2022	Census/DSMD presents its preliminary 2021 NSCG Bridge Panel SOGI findings to NCSES, concluding that the "SOGI series of questions does not appear to be problematic for respondents" and that SOGI questions "have limited risk". Census/DSMD does note that "There would be even less risk [if SO were excluded because SO] took longer to complete, had a higher percent of changed answers, and was responsible for all of the breakoffs on these screens" (however, for completion times and changed-answer rates, the comparable question of mother's education is provided, which showed similar results as SO). For breakoffs, only the flawed and unconventional share of the total breakoffs (STB) measure is provided (see Section II). Although for item nonresponse rates SOGI are compared with other sensitive items (income and salary), these comparisons are not drawn for breakoffs, inconsistent with standard scientific practice for SOGI paradata (see Section II). Census/DSMD additionally cautions that NCSES "should consult subject matter experts".
December 14, 2022	NCSES submits to OMB (30-day FRN) that it will add a GI question, but will not move forward with a SO question, for the 2023 NSCG. No concrete piloting plans are mentioned to OMB for continued exploration of a SO question. This triggers several back-and-forth communications over the next few weeks with NCSES requesting additional data and raising scientific concerns with the rationale. NCSES had cherry-picked data it wished to release publicly for a *Nature* commentary timed before the decision (releasing SO's ~2% "breakoff rate" [STB] and ~2% item nonresponse rate). However, when challenged after the decision it now argues it cannot provide any further data (e.g., comparable paradata for the disability question) due to OMB policy.
January 7, 2023	NCSES is receiving significant attention from *Science* and *Nature* and on social media about its decision. NCSES asks Census/DSMD if the Bridge Panel Report detailing the SOGI findings will be posted to the Census website, and Census/DSMD replies: "We don't typically post these to the Census website, but it'll be sent to NCSES and you can distribute as you'd like".

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January 12, 2023	Census/DSMD sends NCSES a draft of the 2021 NSCG Bridge Panel Report for NCSES feedback. In the report, Census/DSMD now officially recommends excluding a SO item from the 2023 NSCG. This appears to contradict their earlier conclusions that stated adding SO would have minimal risk. As NCSES has always been averse to adding a SO item, it is likely that during the meeting on preliminary findings with Census/DSMD, NCSES conveyed a general reluctance to add SO that then drove Census/DSMD to make a more unequivocal recommendation in line with their sponsor/funder's wishes. Learning that NCSES decided to officially reject SO a month earlier on the survey also likely influenced Census/DSMD to align its recommendation.
January 13, 2023	Letter to NCSES, NSF, and OMB detailing major scientific concerns with NCSES' decision to exclude a SO item, signed by 1,700 scientists, urging NCSES to add a SO item based on the evidence and to publicly release the data. *Nature* and *Science* report on the letter; NCSES publicly commits in *Science* to release the 2021 NSCG data "later this year [2023]".
January 17, 2023	Urgent meeting between OMB and NCSES where OMB wants to know how the 2% "breakoff rate" for SO compares to the full distribution of items. In advance of the meeting, NCSES asks Census/DSMD for information "ASAP" on the distribution. Census/DSMD tells NCSES: "Unfortunately, we only calculated the overall breakoff rate and then the breakoff rates for [SOGI] screens. We did not look at the rates for all screens on the bridge panel. However, comparing to the new cohort production instrument, a 2% breakoff rate would have ranked 11 out of 130 screens that had breakoffs". NCSES then likely conveyed this information to OMB. Census/DSMD and NCSES repeatedly refer to the metric under discussion as a "breakoff rate" although they actually refer to an unconventional and flawed share of the total breakoffs (STB) measure (see Section II); it is not clear if OMB understood that NCSES was not referring to a true breakoff rate and instead referred to this flawed metric that dramatically inflates the apparent breakoff rate (see Section II).
February 1, 2023	Letter from 18 US Senators to NSF calling on the agency to include SOGI measures in NCSES surveys as soon as possible.
February 14, 2023	Census/DSMD officials now recognize major scientific errors in their official recommendation to exclude SO, and have a meeting with NCSES to convey these concerns. Census/DSMD officials are concerned that "when we originally gave [the National Center for Education Statistics (NCES)] recommendations [about the National Teacher and Principal Survey (NTPS)], we said go ahead. We think it'd be fine to use the [SOGI] questions. Now that we've looked at [the NSCG], if [we] go back to [the NTPS] then their unweighted [paradata] numbers actually look worse and we said to use it. So [we're] worried about the conflict[ing] information. The [SOGI] questions don't seem to be an issue [in the NSCG]. The [paradata] results were unweighted and it just didn't look problematic but if we dig deeper, the [NTPS] results are very similar to [the NSCG]". These officials were also concerned that "In our original preliminary results [for the NSCG], we phrased it as [NCSES] 'could' do xyz. Whereas, when it got to the report it got morphed into a more definitive recommendation" – a recommendation they now appear to effectively recant.
February 24, 2023	Official response from the NSF Director to the letter from January 13, 2023 signed by 1,700 scientists. Despite NCSES now being told by Census/DSMD

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	that there is nothing concerning with SO's breakoffs and the breakoff rate did not genuinely need to be investigated further and was not problematic, NCSES nevertheless has the NSF Director state in his letter that "our research findings raised concerns about how the [SO] question performed" and that "our research showed some respondents decided to end the survey immediately after we asked the [SO] question. We need to understand why, and how that affects the overall quality of the survey, before we can move forward with confidence". The Director's letter also states that: "Working with our partners at the U.S. Census Bureau, we expect…release [of the 2021 NSCG data] in March of this year". No release was ever provided through December 2023, thereby requiring FOIA.
March 3, 2023	Our response to the NSF Director's letter, providing greater detail on the scientific concerns not addressed in his letter, including the flawed MTurk response order effect (see Section III).
April 17, 2023	NCSES submits a revised and final submission to OMB of the 2023 NSCG, where NCSES provided greater rationale for why it excluded SO (including the new 90th percentile claim; see above), and committed to continue piloting SO in the 2023 NSCG bridge panel to explore the flawed response order effect. The same day, NCSES asks Census/DSMD again if Census plans to post the 2021 NSCG Bridge Panel report to its website, stating: "We're getting a lot of encouragement from OMB to post our SOGI results, so [we'd] like to get a sense of what Census is planning to do with this report." Census/DSMD replies: "We typically just post these to an internal library, but you all could post it on your website if you wanted to".
April 20, 2023	Census/DSMD sends NCSES the finalized and signed 2021 NSCG Bridge Panel Report**,** although Census/DSMD officials have effectively rescinded their recommendation about SO in the report unofficially and communicated this to NCSES officials privately. As OMB wanted the report finalized before approving, OMB now approves the revised 2023 NSCG submission.
April 21, 2023	Official response from NCSES to the letter from January 13, 2023 signed by 1,700 scientists (30-day FRN). This NCSES letter was also OMB-approved as it is posted on RegInfo.Gov. Despite NCSES now knowing that there is no genuine issue with SO's paradata such as breakoffs and that the breakoff rate does not in fact raise data quality concerns or need to be reduced, NCSES nevertheless states: "We need to understand why respondents break off and will continue our collaboration with other federal statistical agencies that are conducting research in this space to identify ways to reduce the number of breakoffs so that we do not affect the overall quality of the NSCG and our other surveys". NCSES also states that: "We expect [more details on our findings] to be available publicly in the next couple of months". NCSES made nothing publicly available through December 2023, thereby requiring FOIA.
August 29, 2023	Letter to NSF and NCSES, co-signed by AAAS, again formally requesting public release of the data that NCSES publicly committed to in *Science* (and which the NSF Director said would available by March 2023 and NCSES said would be available "in the next couple of months" after April 2023).
December 6, 2023	FOIA request to NSF for the relevant paradata from the 2021 NSCG.
January 3, 2024	NCSES official tells a senior NSF official: "the Census Bureau produced a

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report for NCSES that includes…many of the metrics that Dr. Freeman requested [via FOIA]. [We've] been in touch with [Census] and [are] waiting for their approval on a request to make this report publicly available. If Census approves this request to make the report publicly available, that will resolve the FOIA request. If Census denies the request, [we] will explore alternative options for how to respond to the FOIA request. [We] spoke with Census in early December, but have not receive[d] a decision". This is despite the fact that this NCSES official was explicitly told by Census/DSMD twice – once on January 7, 2023 and a second time on April 17, 2023 – that NCSES is free to post the report to its website or disseminate publicly however it pleases.

January 8, 2024

Now having reached out to Census/DSMD about the data myself, Census/DSMD quickly replies that they have a report with the requested data and have just reached out to NCSES to ask if they can provide me with the report. This seems to contrast with NCSES' statements to NSF that there are Census approvals still involved, including the possibility that Census may even deny the request (and despite the fact this NCSES official was told twice by Census/DSMD that NCSES is free to publicly post the report).

January 22, 2024

Census/DSMD tells me that NCSES has now posted the 2021 NSCG Bridge Panel Report to their website. The limited data in the report appear to reveal major scientific errors, which are later confirmed by additional data revealed by several FOIA requests to Census. See Section II.

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Appendix

See pages that follow.

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My concern was that I didn't want NSCG's decision to weigh too heavily on our recommendation and for it to be the driving force. I wanted to make sure NCES was consulting other sources – like

Your data users

Policy makers, etc.

I think that since nscg is repeated that you wouldn't want to lose people in the first cycle so breakoffs are important.

But I just wanted to make sure you're weighing other factors.

I'm sure you are.

In our original preliminary results, we phrased it as NSCG "could" do xyz. Whereas, when it got to the report it got morphed into a more definitive recommendation.

I guess I was more concerned that I'm presenting on ntps and when we originally gave them recommendations, we said go ahead. We think it'd be fine to use the sogi questions.

Now that we've looked at nscg, if I go back to ntps then their unweighted numbers actually look worse and we said to use it. So I'm worried about the conflict information.

The questions don't seem to be an issue

The results were unweighted and it just didn't look problematic but if we dig deeper,

The results are very similar to nscg

Breakoffs as a Percent of Respondent Visits by Page - 2021 National Survey of College Graduates

Page Name	Percent
b_accep	(D)
b_acedv	0
b_acintro	(D)
b_age	0
b_chintro	0.4
b_chlvin	0
b_chtot	0.1
b_clicintro	0.3
b_clicnmbr	(D)
b_clicnow	0
b_clicwkr	0.2
b_cmintro	0.1
b_contact	0.3
b_ctzdual	0
b_ctzfor	0
b_ctzusin	0
b_difage	0
b_difall	0.2
b_earn	0.5
b_earnprb	0.7
b_eminfo	1.1
b_emmain	0.1
b_emsmi	0.1
b_erncov1	0
b_erndec	0.2
b_erninc	(D)
b_facintro	0.2
b_fncv	(D)
b_fsintro	0
b_ftpret	0
b_ftprtyr	(D)
b_gender	0
b_govsup	0.1
b_grfintro	0
b_grloanowe	0.1
b_hrswk	0
b_jobsatis	0
b_last_job	0.6
b_lookwk	0.3
b_lwev	0.2
b_marsta	0
b_mgintro	0.1
b_n2oclstx	0.1
b_n2oclstx2	0.3
b_n2oclstx3	0

b_n2ocprx	0.1
b_n2ocprx2	0.2
b_n2ocprx3	(D)
b_nacedx	(D)
b_nacedx2	0
b_nedtp	0.1
b_nrrea	(D)
b_nrsec	0
b_nwintro	0.4
b_nwrtyr	0.3
b_oclstv	0.4
b_ocprt	0.1
b_ocprv	0.7
b_permvyr	(D)
b_pjretyr	0
b_reside	0.1
b_salary	0.2
b_salcov1	0.1
b_salcov2	(D)
b_saldec	(D)
b_saleff	0
b_salinc	0
b_salprobe	0.4
b_satintro	0.2
b_smodep	0
b_spintro	0.2
b_spowk	0
b_strtdate	0.2
b_supwk	0
b_telew	0.1
b_ugfintro	0.1
b_ugloanowe	0.1
b_verifydob	0.3
b_verifyname	0.2
b_verifyname	0.4
b_verifyname	1.8
b_vetdateintr	0
b_vetstat	0
b_vsatp	D
b_waintro	0.5
b_wapri	0
b_wasec	0
b_wkprobe2	0.2
b_wktrni	0.1
b_wrkg	0.2
b_wrkgp	0.1
b_wtreasn	0

b_wtrintro	0.1
bftintro	0.2
birthdate	0
cert_license	0.1
cert_license_	0.8
continue	0
crit	0
em_size_new	0.2
employee_ed	0.1
emprobe	0
enrolled	0
enrolled_deg	(D)
first_us_visa	0.3
fod_job_relat	0.1
hispcat	0
login	0
n_asdgri	0
n_bachk	0
n_bsdgn	(D)
n_bsdgri	0.1
n_bthstv	0
n_ccintro	0.2
n_ccpri	(D)
n_ccsch	0.3
n_ccsec	(D)
n_cmpri	(D)
n_cmsec	0
n_comcoli	0
n_csintro	0.1
n_d2	0.1
n_d2dg	(D)
n_d2miv	(D)
n_d2mvi	0
n_d3	0.3
n_d3dg	(D)
n_d3miv	0
n_d3mvi	(D)
n_d4	0
n_d4dg	0
n_d4miv	0
n_d4mvi	0
n_d5	0
n_d5dg	0
n_d5miv	0
n_d5mvi	0
n_dgchk	0
n_dgchk2	0

n_dgchk3	0
n_dgchk4	0
n_eddad	0
n_edmom	0
n_fnvsatp	0
n_hsstv	0.1
n_hsyr	0.1
n_mrd	0.3
n_mrdg	0
n_mrmiv	0
n_mrmvi	0
n_nd2medx	0
n_nd2medx2	(D)
n_nd2nedx	(D)
n_nd2nedx2	(D)
n_nd3medx	0
n_nd3medx2	0
n_nd3nedx	0
n_nd3nedx2	0
n_nd4medx	0
n_nd4medx2	0
n_nd4nedx	0
n_nd4nedx2	0
n_nd5medx	0
n_nd5medx2	0
n_nd5nedx	0
n_nd5nedx2	0
n_nmrmedx	0
n_nmrmedx2	0.1
n_nmrnedx	0
n_nmrnedx2	0
n_verifyacs	0.2
other_cert	0
pj	0.3
raceintro	0
society_assoc	0.1
sup	0
thank_you	0
weeks_year	0

(D) - Suppressed for disclosure avoidance

Breakoffs by Page as a Percent of all Breakoffs - 2021 National Survey of College Graduates

Page	Percent
b_accep	(D)
b_acintro	(D)
b_chintro	0.7
b_chlvin	0.4
b_chtot	0.3
b_clicintro	1.1
b_clicnmbr	(D)
b_clicnow	0.2
b_clicwkr	0.7
b_cmintro	0.1
b_contact	2.9
b_ctzdual	0.1
b_ctzusin	0.3
b_difage	0.1
b_difall	1.7
b_earn	4.1
b_earnprb	0.5
b_eminfo	10.3
b_emmain	1.1
b_emsmi	0.4
b_erncov1	0.3
b_erndec	0.5
b_erninc	(D)
b_facintro	1.6
b_fncv	(D)
b_fsintro	0.0
b_ftpret	0.4
b_ftprtyr	(D)
b_gender	0.1
b_govsup	0.5
b_grfintro	0.1
b_grloanowe	0.5
b_hrswk	0.3
b_jobsatis	0.2
b_last_job	1.7
b_lookwk	1.0
b_lwev	0.2
b_marsta	0.2
b_mgintro	0.9
b_n2oclstx	0.2
b_n2oclstx2	0.6
b_n2ocprx	0.4
b_n2ocprx2	1.2
b_n2ocprx3	(D)

b_nacedx	(D)
b_nedtp	1.0
b_nrrea	(D)
b_nwintro	1.1
b_nwrtyr	0.5
b_oclstv	0.9
b_ocprt	0.9
b_ocprv	6.4
b_permvyr	(D)
b_reside	1.1
b_salary	1.5
b_salcov1	0.8
b_salcov2	(D)
b_saldec	(D)
b_saleff	0.0
b_salprobe	0.2
b_satintro	1.3
b_spintro	1.2
b_spowk	0.0
b_strtdate	1.9
b_supwk	0.4
b_telew	0.5
b_ugfintro	1.4
b_ugloanowe	1.3
b_verifydob	4.2
b_verifyname	2.6
b_verifynamea	0.3
b_verifynameb	0.1
b_vetstat	0.1
b_vsatp	(D)
b_waintro	4.0
b_wapri	0.2
b_wasec	0.0
b_wkprobe2	0.6
b_wktrni	0.9
b_wrkg	2.8
b_wrkgp	0.5
b_wtreasn	0.1
b_wtrintro	0.3
bftintro	1.4
cert_license	0.9
cert_license_one	3.1
em_size_newbus	1.6
employee_educ	0.6
enrolled	0.2
enrolled_degree_fos	(D)

first_us_visa	0.3
fod_job_related	0.8
hispcat	0.3
login	0.1
n_asdgri	0.1
n_bsdgn	(D)
n_bsdgri	0.9
n_bthstv	0.3
n_ccintro	1.2
n_ccpri	(D)
n_ccsch	0.7
n_ccsec	(D)
n_cmpri	(D)
n_comcoli	0.5
n_csintro	0.4
n_d2	0.4
n_d2dg	(D)
n_d2miv	(D)
n_d3	0.2
n_d3dg	(D)
n_d3mvi	(D)
n_dgchk	0.3
n_dgchk2	0.1
n_eddad	0.3
n_edmom	0.3
n_hsstv	1.0
n_hsyr	0.6
n_mrd	2.8
n_mrdg	0.2
n_mrmvi	0.3
n_nd2medx2	(D)
n_nd2nedx	(D)
n_nd2nedx2	(D)
n_nmrmedx	0.2
n_nmrmedx2	0.3
n_verifyacs	1.9
other_cert	0.0
pj	0.3
raceintro	0.0
society_association	0.6
sup	0.2
weeks_year	0.3

(D) - Suppressed for disclosure avoidance
The Census Bureau has reviewed this data product to ensure appropriate access, use, and disclosure avoidance protection of the confidential source data used to produce this product (Data Management System (DMS) number: P-7533594,

breakoffs

Disclosure Review Board (DRB) approval number: CBDRB-FY24-POP001-0088)

The U.S. Census Bureau reviewed this data product for unauthorized disclosure of confidential information and approved the disclosure avoidance practices applied to this release. CBDRB-FY23- POP001-0008.

2021 NSCG Bridge Panel Analysis: Preliminary Results for the Sexual Orientation and Gender Identity (SOGI) Questions

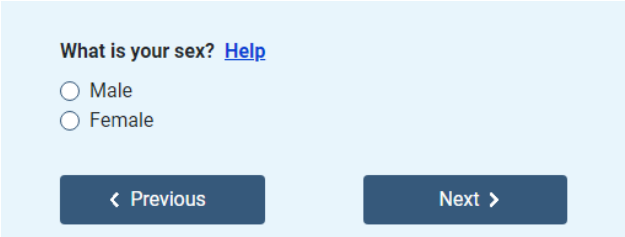
Renee Reeves, Beth N Satisky, Nevada Basdeo, and Rachel Horwitz

I. Background

Screenshots of the applicable screens are provided below.

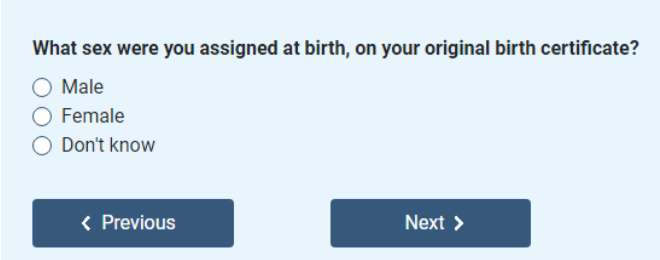
Production

GENDER

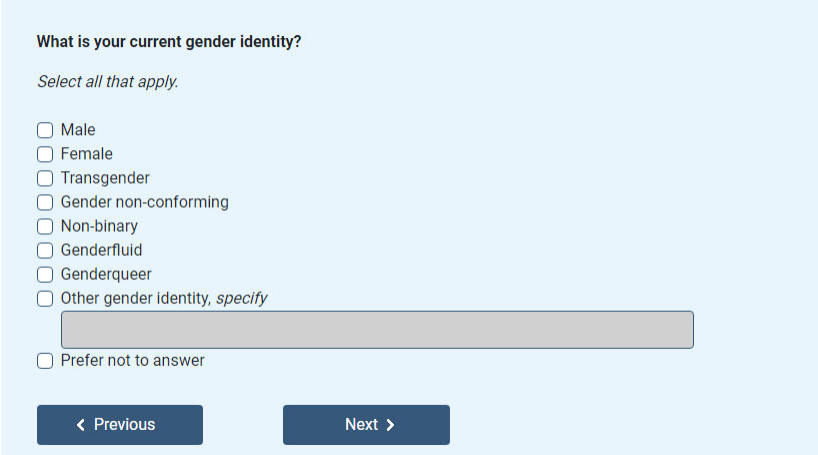


Bridge Panel

BIRTH_GENDER



NOW_GENDER



ORIENTATION

II. Analysis

- Item Nonresponse
- Weighted Response Distributions
- Breakoffs
- Changed Answers
- Previous Clicks
- Completion Times

Statistical comparisons across instruments were only made between GENDER and BIRTH_GENDER for most measures. Comparisons between GENDER and NOW_GENDER or ORIENTATION were not appropriate in most cases as the topic, length, order, and type of question (select one vs. select all) were different. Additionally, if the intent is to have three questions in place of one, it's expected that item nonresponse, breakoffs, changed answers, previous clicks, and completion times will all be greater for three questions compared to one question.

III. Results

A. Item Nonresponse

The item nonresponse rates for GENDER and BIRTH_GENDER were not significantly different. Of the SOGI questions, the sexual orientation question had the highest item nonresponse rate. In comparison to two other sensitive questions (SALARY and EARN), the SOGI item nonresponse rates were lower.

Table 1: Item Nonresponse Rates (SOGI)

Production	Bridge Panel		
GENDER	BIRTH_GENDER	NOW_GENDER	ORIENTATION
0.5%	0.4%	0.6%	2.1%

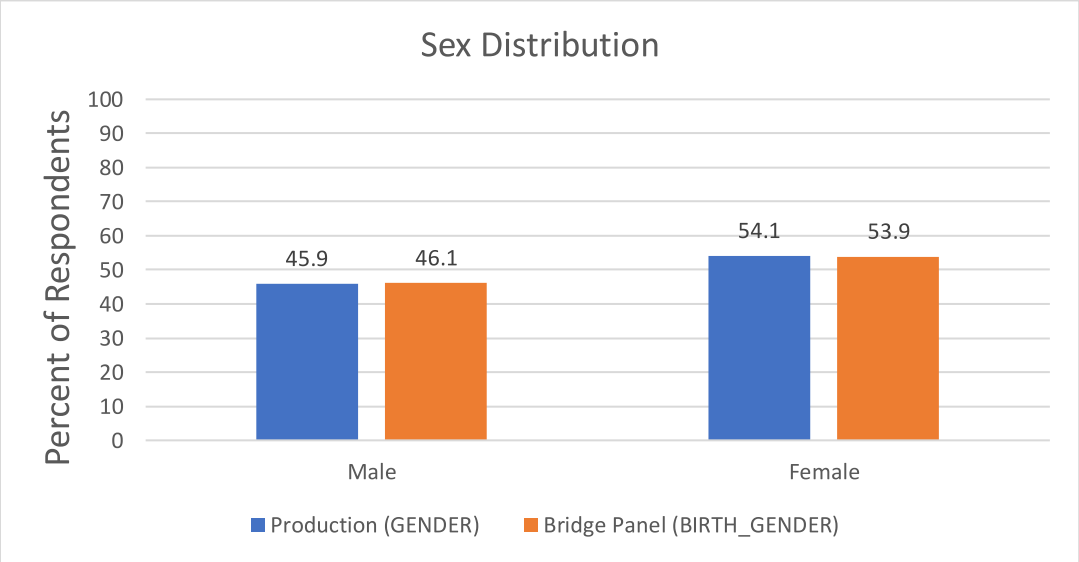
Table 2: Item Nonresponse Rates (SALARY and EARN)

SALARY		EARN	
Production	Bridge Panel	Production	Bridge Panel
5.1%	5.5%	7.0%	7.2%

B. Weighted Response Distributions

The weighted response distributions were not significantly different between the production and bridge panel sex questions when removing the "Don't know" responses from BIRTH_GENDER.

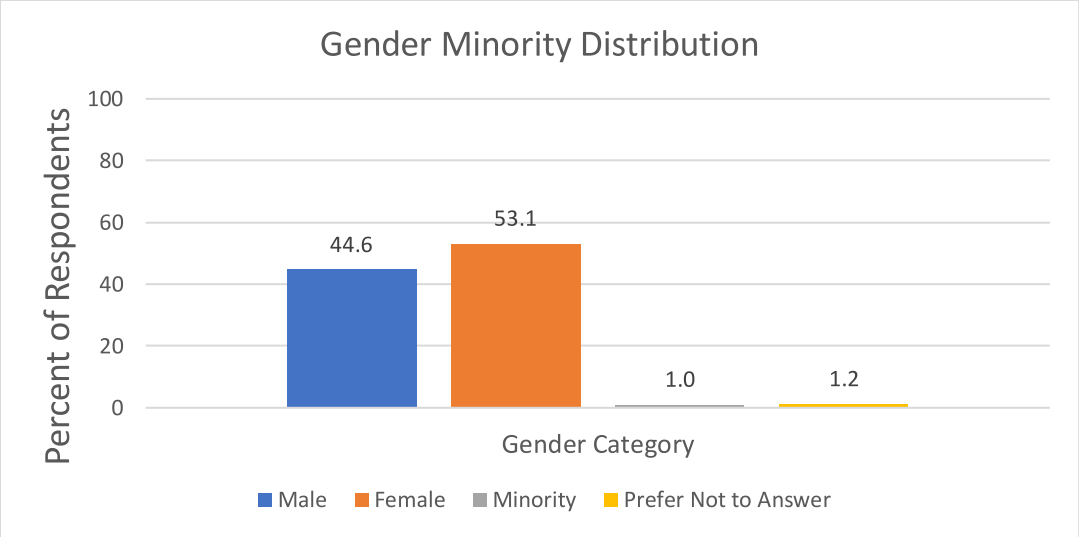
Figure 1. Production and Bridge Panel Sex Distribution*



*Removed "Don't know" responses from BIRTH_GENDER (less than 0.1 percent of respondents answered "Don't know")

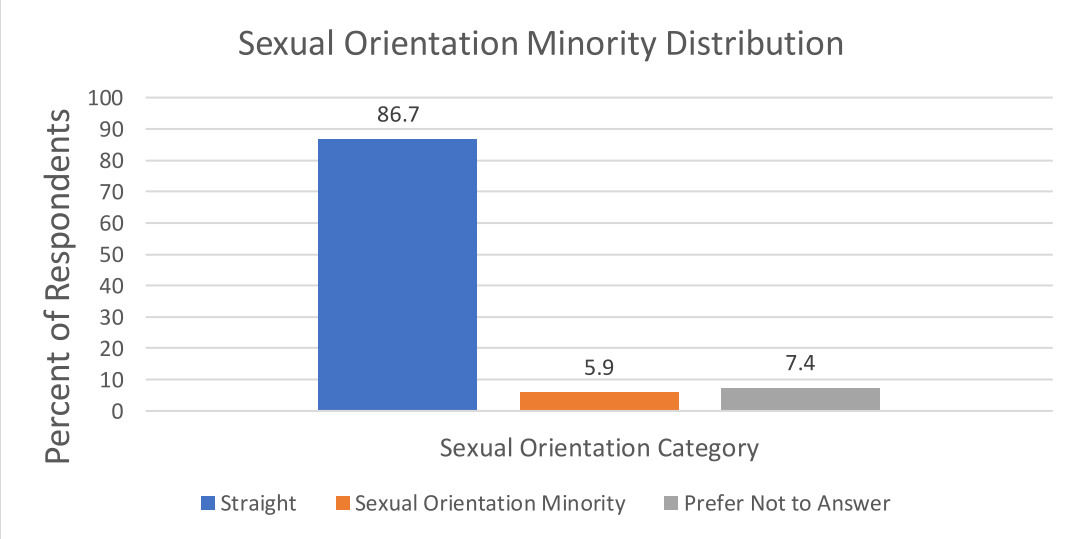
Gender minorities accounted for only 1.0 percent of bridge panel respondents.

Figure 2. Gender Minorities in the Bridge Panel (defined using BIRTH_GENDER and NOW_GENDER)



Approximately six percent of bridge panel respondents were considered sexual orientation minorities and 7.4 percent selected "Prefer not to answer" to this question.

Figure 3. Sexual Orientation Minorities in the Bridge Panel (defined using ORIENTATION)



Cross-distributions of the SOGI items with eight demographic characteristics showed several significant differences in respondent makeup for GENDER and BIRTH_GENDER. Sexual orientation minorities showed significant differences for only age group and marital status.

Table 3: Significant Differences in Response Distributions Across Demographic Characteristics

Characteristic	Production	Bridge Panel	
	GENDER (Male/Female)	BIRTH_GENDER (Male/Female)	Sexual Orientation Minority (Yes/No)
Age Group	*	*	*
Citizenship	*		
Highest Degree	*	*	
Hispanic Origin	*	*	
Race	*	*	
S&E Degree	*	*	
S&E Occupation	*	*	
Marital Status	*		*

*Indicates significant difference with alpha = 0.1

Note: The number of gender minorities was too small to provide information by demographic characteristic.

C. Breakoff Rates

The number of breakoffs in both instruments was low with no breakoffs occurring on BIRTH_GENDER or NOW_GENDER; however, the percent of breakoffs on ORIENTATION was significantly higher than on GENDER.

Table 4: Percent of all Breakoffs

Production	Bridge Panel		
GENDER	BIRTH_GENDER	NOW_GENDER	ORIENTATION
0.1%	0.0%	0.0%	2.0%

D. Changed Answer Rates

The percent of respondents who changed their answer was relatively low for all four screens. The rates for GENDER and BIRTH_GENDER were not significantly different.

Table 5: Percent of Respondent Visits with a Changed Answer

Production	Bridge Panel		
GENDER	BIRTH_GENDER	NOW_GENDER	ORIENTATION
1.0%	1.0%	2.5%	3.4%

E. Previous Clicks

The percent of respondent visits with a previous click on these screens was low. The rates for GENDER and BIRTH_GENDER were not significantly different.

Table 6: Percent of Respondent Visits with a Previous Click

Production	Bridge Panel		
GENDER	BIRTH_GENDER	NOW_GENDER	ORIENTATION
0.8%	0.7%	2.5%	2.0%

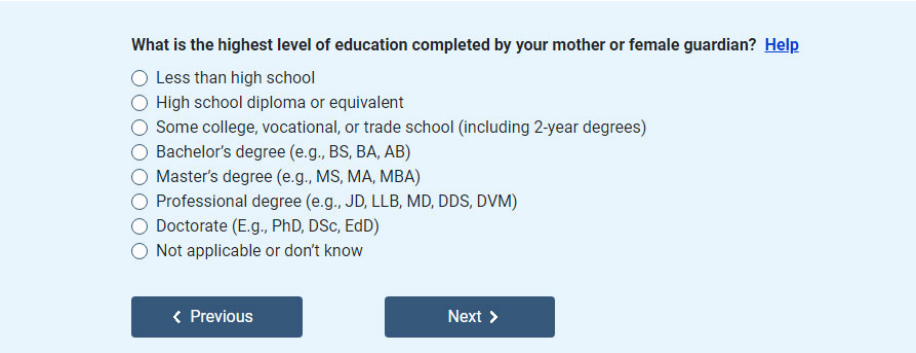
F. Completion Times

It took respondents significantly longer to complete BIRTH_GENDER than GENDER; however, birth gender is a longer question and is expected to take more time to read and comprehend.

Table 7: Median Completion Times

Production	Bridge Panel			
GENDER	BIRTH_GENDER	NOW_GENDER	ORIENTATION	EDMOM
2.6	4.3	4.7	10.1	9.5

EDMOM



IV. Conclusions

- The bridge panel SOGI series of questions does not appear to be problematic for respondents.
- If NSCG is interested in learning more about the gender and sexual orientation minority population then using the bridge panel SOGI questions in place of the production sex question would provide additional information and have limited risk.
    - There would be even less risk if just BIRTH_GENDER and NOW_GENDER were used without ORIENTATION as ORIENTATION took longer to complete, had a higher percent of changed answers, and was responsible for all of the breakoffs on these screens.

V. Recommendations

- NSCG could use BIRTH_GENDER and NOW_GENDER in production and conduct more testing on ORIENTATON in focus groups or cognitive testing to gain more insight on respondents' reactions and responses to this question.
- Other surveys have recommended having the sex and gender questions on the same screen. NSCG could test putting BIRTH_GENDER and NOW_GENDER together.
- As public opinion about the SOGI topic changes, respondent reactions and behaviors surrounding these questions may change. This is a limitation of this analysis and NSCG should consult subject matter experts to keep abreast of the changing environment to ensure the questions and response options change as appropriate.

[redacted]

[redacted]

Sent: Wednesday, October 12, 2022 11:41 AM

[redacted]

Subject: Re: SOGI questions on other Census surveys

All,

I put together the SOGI results here:

(b) (2) [redacted]

[redacted] - can you access this directory?

I have unweighted and weighted results for all SOGI items. And I also crossed each of them by S&E working status like NSF requested.

However, I'm not sure (b) (5) [redacted]

(b) (5) [redacted]

Is this something we need to discuss with [redacted]

[redacted]

[redacted]

Sent: Wednesday, October 5, 2022 12:22 PM

[redacted]

Subject: Re: SOGI questions on other Census surveys

[redacted] - is the item below something you can answer? I think we have the estimates, but can't say whether they'd be publishable or not. Let us know if you want us to help with anything on this.

[redacted]

Sent: 1/17/2023 8:10:44 PM

[redacted]

Subject: Re: ASAP (by 3pm) - NSCG Breakoff Rates by Questionnaire Item

The bridge panel breakoff rate was 10.5 percent.

For comparison, in the bridge panel analysis where we restricted the universe to non-certainties, the new cohort breakoff rate was 8.6 percent. (For the full new cohort universe the breakoff rate was 8.4 percent).

Yes, 11th and 15th means the 11th and 15th highest.

Thanks,
[redacted]

[redacted]

[redacted]

Sent: Tuesday, January 17, 2023 3:01 PM

[redacted]

Subject: RE: ASAP (by 3pm) - NSCG Breakoff Rates by Questionnaire Item

Thanks! What's the overall breakoff rate?

11th and 15th means 11th and 15th highest?

[redacted]

Sent: Tuesday, January 17, 2023 2:56 PM

[redacted]

Subject: [EXTERNAL] - Re: ASAP (by 3pm) - NSCG Breakoff Rates by Questionnaire Item

Hi [redacted]

Unfortunately, we only calculated the overall breakoff rate and then the breakoff rates for these specific screens. We did not look at the rates for all screens on the bridge panel. However, comparing to the new cohort production instrument, a 2% breakoff rate would have ranked 11 out of 130 screens that had breakoffs (#15 out of 102 screens for the old cohort).

The calculation of breakoff rates has gotten more complicated after learning more about the how the paradata are currently collected. To try to simplify this, take a case that broke off. The last page in their paradata record is not the last page they were on. Their actual last page was the next page they saw, but since they broke off on that page no data were captured. It's actually a bit more complicated and nuanced, but this gives you an idea of the issue. To identify the correct breakoff page in production, we identified all of the final pages in the paradata and then provided that list to ADDP for them to tell us the next screen the respondent would have seen based on the skip patterns. That then comes back to us and is flagged as the breakoff page and then we calculate the rates. Since this is labor intensive, we didn't do it for the bridge panel and only focused on the relevant screens to save time.

Hopefully this provides enough information for the meeting. Let us know if there's anything else we can do. If you/OMB want the full distribution, it would probably take 3 weeks or soon our end. Not sure how much time ADDP would need based on competing priorities. Thanks!

[redacted]

[redacted]

Sent: Tuesday, January 17, 2023 2:32 PM

[redacted]

Subject: ASAP (by 3pm) - NSCG Breakoff Rates by Questionnaire Item

Hi [redacted]

Can either of you provide breakoff rates for the NSCG bridge panel by questionnaire item ASAP?

I have a meeting with OMB at 3pm and they wanted to see those numbers to help understand our decision-making process related to the SOGI questions. They want to understand where 2% breakoff for sexual orientation fits in the distribution across all questions.

If you can't give me the full set of breakoff rates, can give me some high-level response to inform my conversation with OMB.

Thanks,

[redacted]

[redacted]

National Science Foundation
(b) (6)
[redacted]
www.nsf.gov/statistics

[redacted]

Sent: 2/7/2023 8:27:46 PM

[redacted]

Subject: Re: ASAP (by 3pm) - NSCG Breakoff Rates by Questionnaire Item

Hi [redacted]

NCSES is currently reviewing the report. Comments were due back on 2/3, but [redacted] reached out to Judi to asked for an extension to this Thursday to give additional staff time to review.

We don't typically post these to the Census website, but it'll be sent to NCSES and you can distribute as you'd like.

Not sure of the extent of the comments we'll receive, but it should be wrapped up and routed pretty quickly after receiving the feedback (assuming the comments aren't too extensive).

Thanks!

[redacted]

[redacted]

Sent: Tuesday, February 7, 2023 3:05 PM

[redacted]

Subject: RE: ASAP (by 3pm) - NSCG Breakoff Rates by Questionnaire Item

Hi [redacted]

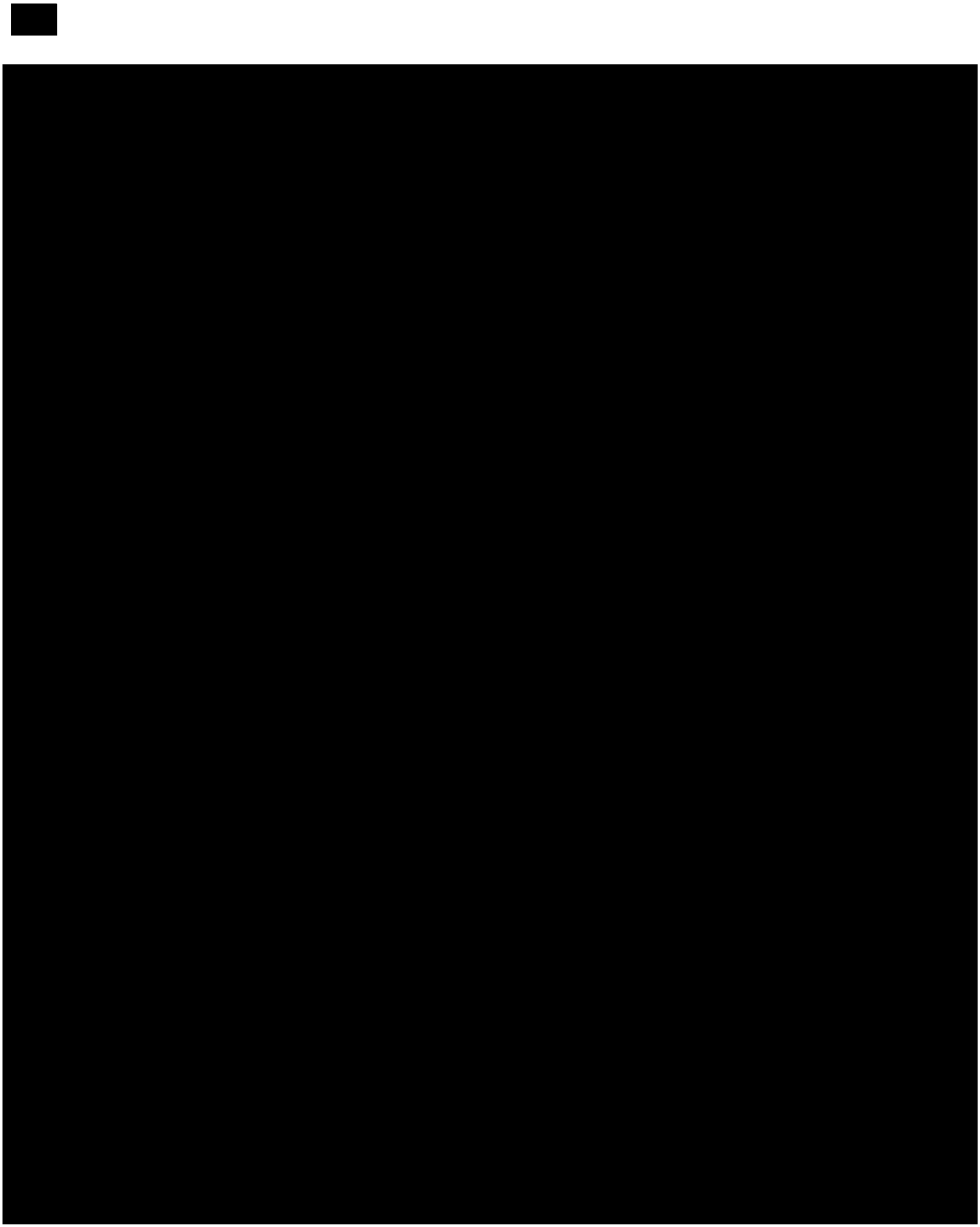
Do you a general timetable for when Census plans to release the attached analysis report? Also, will this report be posted to the Census website?

As you may have heard, NCSES has received a decent amount of feedback on our decision to not include sexual orientation on the 2023 NSCG. Given our goal of being transparent with our decision-making process, our hope is this report will be shared publicly relatively soon.

Also, where are you in terms of receiving feedback from NCSES? I may have some comments and want to know how quickly you need them.

Any insight would be appreciated.

Thanks,



[redacted]

Sent: 2/13/2023 1:19:06 PM

[redacted]

Subject: Fw: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]
Attachments: Draft 2021 NSCG Bridge Panel Analysis Report_v13 (jmf).docx

Hi [redacted]

See [redacted] email below and let me know when you have a few minutes to chat about how we want to handle the sexual orientation question, if at all. It could just be a conversation with him explaining why we made the recommendation and how it compared to NTPS. Thanks!

[redacted]

[redacted]

Sent: Friday, February 10, 2023 6:57 PM

[redacted]

Subject: FW: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

CUI//STAT

Hi [redacted]

We're planning to create an NCSES working paper that summarizes the results from the SOGI questions within the bridge panel. As you can imagine, the working paper will be based heavily on the bridge panel analysis report that your team drafted. We want to create a working paper to have a publicly available version of the results from the SOGI bridge panel study (in an effort at openness and transparency).

Here are my questions for you:

1. Do you have any concerns with us using the analysis report to drive the content for our working paper?
2. Are you ok with [redacted] serving as co-authors on the working paper? We'll draft the working paper, but I would want them (and you) to review it to ensure I didn't mischaracterize any of the findings. Oh, you can be a co-author too.

Just let me know your thoughts. If it's easier to chat about this idea, let me know and we can set up time to talk.

Thanks,
[redacted]

[redacted]

Sent: Friday, February 10, 2023 6:48 PM

[redacted]

[redacted]

Sent: 2/13/2023 6:29:52 PM

[redacted]

Subject: Re: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

Works for us! Invite sent.

[redacted]

[redacted]

Sent: Monday, February 13, 2023 1:26 PM

[redacted]

Subject: RE: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

Hi [redacted]

How's tomorrow at 12:30 look for you two? Just let me know.

Thanks,

[redacted]

[redacted]

Sent: Monday, February 13, 2023 1:22 PM

[redacted]

Subject: [EXTERNAL] - Re: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

Hi [redacted]

[redacted] and I would like to discuss the sexual orientation recommendation in the report a bit more before you create the working paper. Let us know a time that works for you and we'll get something on the calendar. Thanks!

[redacted]

[redacted]

Sent: Friday, February 10, 2023 6:57 PM

[redacted]

Subject: FW: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

CUI//STAT

Hi [redacted]

We're planning to create an NCSES working paper that summarizes the results from the SOGI questions within the bridge panel. As you can imagine, the working paper will be based heavily on the bridge panel analysis report that your team drafted. We want to create a working paper to have a publicly available version of the results from the SOGI bridge panel study (in an effort at openness and transparency).

Here are my questions for you:

1. Do you have any concerns with us using the analysis report to drive the content for our working paper?
2. Are you ok with [redacted] serving as co-authors on the working paper? We'll draft the working paper, but I would want them (and you) to review it to ensure I didn't mischaracterize any of the findings. Oh, you can be a co-author too.

Just let me know your thoughts. If it's easier to chat about this idea, let me know and we can set up time to talk.

Thanks,
[redacted]

[redacted]

Sent: Friday, February 10, 2023 6:48 PM

[redacted]

Subject: RE: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

CUI//STAT

Hi all,

My comments to the Bridge Panel Analysis report are included in the attached document. If you have any questions, please let me know.

Thanks,
[redacted]

[redacted]

[redacted]

Sent: 4/17/2023 2:06:06 PM

[redacted]

Subject: Re: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

We typically just post these to an internal library, but you all could post it on your website if you wanted to.

[redacted]

[redacted]

Sent: Monday, April 17, 2023 9:54 AM

[redacted]

Subject: RE: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

Hi [redacted]

Thanks for the update. Does Census plan to post this report to its website?

We're getting a lot of encouragement from OMB to post our SOGI results, so I'd like to get a sense of what Census is planning to do with this report. Just let me know.

Thanks,

[redacted]

[redacted]

Sent: Monday, April 17, 2023 9:52 AM

[redacted]

Subject: [EXTERNAL] - Re: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

Good morning [redacted]

We are currently routing the report for signature and hope to have it to you by the end of the week. You'll have it early next week at the latest. Thanks!

[redacted]

[redacted]
Sent: Friday, April 14, 2023 5:04 PM
[redacted]
Subject: FW: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

CUI//STAT

Hi [redacted]

Does anyone know the timetable for the finalization of the 2021 NSCG bridge panel report? OMB is asking.

Any insight would be appreciated.

Thanks,
[redacted]

[redacted]
Sent: Friday, February 10, 2023 6:48 PM
[redacted]
Subject: RE: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

CUI//STAT

Hi all,

My comments to the Bridge Panel Analysis report are included in the attached document. If you have any questions, please let me know.

Thanks,
[redacted]

[redacted]
Sent: Friday, February 10, 2023 11:02 AM
[redacted]

[redacted]

Subject: RE: For your review: Draft 2021 NSCG Bridge Panel Report [Contains CUI]

CUI//STAT

Hi [redacted]

Please see attached email for our comments on the bridge panel analysis report. As noted, [redacted] (copied here) will also provide comments later today.

Thanks,
[redacted]

[redacted]

Sent: Friday, February 10, 2023 10:44 AM

[redacted]

Subject: [EXTERNAL] - Re: For your review: Draft 2021 NSCG Bridge Panel Report

Hi [redacted]

I wanted to reach out to see if your comments on the 2021 NSCG Bridge Panel report were ready for us. Please let me know if you need more time.

Thank you!

[redacted]

Sent: Thursday, January 12, 2023 4:26 PM

[redacted]

Subject: For your review: Draft 2021 NSCG Bridge Panel Report

Hi [redacted]

Attached is the draft 2021 Bridge Panel report. Please provide comments by Friday, February 3, and don't hesitate to reach out if you have any questions at all.

We look forward to your feedback!

Thank you,

[redacted]