

March 27, 2025

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Departmental PRA Compliance Officer

Office of the Under Secretary for Economic Affairs, U.S. Department of Commerce

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; High-Frequency Surveys Program/Household Trends and Outlook Pulse Survey (HTOPS)

We appreciate the opportunity to provide comments on the Department of Commerce's notice regarding revision of information collection through the March, April, and May 2025 Household Trends and Outlook Pulse Survey (the "HTOPS"). See 90 Fed. Reg. 10879 (Feb. 28, 2025).

The undersigned are scholars affiliated with the Williams Institute at the UCLA School of Law. The Williams Institute, dedicated to conducting rigorous and independent research, collects and analyzes original data, as well as analyzes governmental and private data, and has long worked with federal agencies to improve data collection on the U.S. population. These efforts include producing widely cited best practices for the collection of sexual orientation and gender identity information on population-based surveys.¹

In its comment request, the Department of Commerce ("The Department") described the HTOPS as an instrument "designed to ensure the availability of frequent data collection for nationwide estimates on a variety of topics for a variety of subgroups of the population."² Lesbian, gay, bisexual, and transgender (LGBT) people are a notable subgroup of the U.S. population and existing data describes important differences in social, economic, physical, and psychological wellbeing related to sexual orientation and gender identity.³ Historically, the Household Pulse Survey (HPS) has been a vital tool for researchers and policymakers to examine these differences

¹ See, e.g., GENDER IDENTITY IN U.S. SURVEILLANCE (GENIUSS) GROUP, WILLIAMS INST., BEST PRACTICES FOR ASKING QUESTIONS TO IDENTIFY TRANSGENDER AND OTHER GENDER MINORITY RESPONDENTS ON POPULATION-BASED SURVEYS (2014), <https://williamsinstitute.law.ucla.edu/publications/geniuss-trans-pop-based-survey/>; SEXUAL MINORITY ASSESSMENT RESEARCH TEAM (SMART), WILLIAMS INST., BEST PRACTICES FOR ASKING QUESTIONS ABOUT SEXUAL ORIENTATION ON SURVEYS (2009), <https://williamsinstitute.law.ucla.edu/publications/smart-so-survey/>

² 90 Fed. Reg. 10,879.

³ See, e.g., ILAN H. MEYER, BIANCA D.M. WILSON & KATHRYN O'NEILL, WILLIAMS INST., LGBTQ PEOPLE IN THE US: SELECT FINDINGS FROM THE GENERATIONS AND TRANSPop STUDIES (2021), <https://williamsinstitute.law.ucla.edu/publications/generations-transpop-toplines/> (summarizing findings from LGBTQ-specific population-based national surveys, NIH-funded Generations (HD078526) and TransPop (HD090468) studies)

and track changes over time.⁴ As HTOPS has replaced the HPS,⁵ we offer this comment to underscore how data collection on sexual orientation and gender identity can improve insight into priorities outlined by the Census Bureau in the above-captioned Federal Register Notice.

I. LGBT People are a Sizeable and Diverse Subgroup of the U.S. Population.

LGBT people make up a substantial portion of the U.S. population. For example:

- Approximately 5.5% of the U.S. adult population identifies as lesbian, gay, bisexual, or transgender.⁶ Applying these figures to the U.S. population, we estimate that over 14 million adults in the U.S. identify as LGBT.
- Transgender people are, by definition, those whose gender identity, or internal sense of their own gender, is incongruous from the sex that was assigned to them at birth.⁷ We estimate that approximately 1.3 million adults aged 18 and older identify as transgender.⁸
- Approximately 1.2 million LGBTQ adults identify as nonbinary in the U.S.⁹ Nonbinary refers to a gender identity that is not strictly “Male” nor “Female.”¹⁰
- “Intersex” refers to people whose sex characteristics do not fall into the typical binary categories of male and female.¹¹ Although data are limited and further research is needed to better understand the size of this population, the best available estimate suggests that intersex people make up 1.7% of the U.S. population.¹² The Department of Health and Human Services estimates that up to 5 million people in the U.S. may be intersex.¹³

⁴ See e.g. BIANCA D.M. WILSON, ET AL., WILLIAMS INST., *LGBT POVERTY IN THE UNITED STATES* (Feb. 2023), <https://williamsinstitute.law.ucla.edu/publications/lgbt-poverty-us/>; Thom File, *Household Pulse Survey Shows LGBT Adults More Likely to Report Living in Households With Food and Economic Insecurity*, U.S. CENSUS BUR. (Aug. 11, 2021), <https://www.census.gov/library/stories/2021/08/lgbt-community-harder-hit-by-economic-impact-of-pandemic.html>; A.B. D’Angelo, et al., *Changes in Health Insurance During COVID-19 Among a U.S. National Cohort of Cisgender Gay and Bisexual Men and Transgender Individuals*, 4(3) ANNALS OF LGBTQ PUB. & POP. HEALTH 232 (2023), <https://doi.org/10.1891/lgbtq-2022-000>; CHRISTY MALLORY & WILL TENTINDO, WILLIAMS INST. *MEDICAID COVERAGE FOR GENDER-AFFIRMING CARE*, (2022), <https://williamsinstitute.law.ucla.edu/publications/medicaid-trans-health-care/>; CONG. EQUALITY CAUCUS, *INAUGURAL REPORT ON THE CONDITION OF LGBTQ+ PEOPLE IN THE UNITED STATES* (Dec. 2022), <https://equality.house.gov/sites/evo-subsites/equality.house.gov/files/evo-media-document/cec-inaugural-report-on-the-condition-of-lgbtq%2B-people-12.15.22.pdf>.

⁵ U.S. Census Bureau, *Household Pulse Survey*, U.S. DEP’T OF COMMERCE, <https://www.census.gov/data/experimental-data-products/household-pulse-survey.html> (last visited Mar. 26, 2025).

⁶ ANDREW R. FLORES & KERITH J. CONRON, WILLIAMS INST., *LGBT ADULTS IN THE U.S. POPULATION* (2023), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/LGBT-Adult-US-Pop-Dec-2023.pdf>.

⁷ 90 Fed. Reg. 10879.

⁸ See e.g. J. White Hughto, S.L. Reisner, & J.E. Pachankis, *Transgender Stigma and Health: A Critical Review of Stigma Determinants, Mechanisms, and Interventions*, 11 SOC SCI MED. 147 (2015). <https://doi.org/10.1016/j.socscimed.2015.11.010>

⁹ JODY L. HERMAN, ANDREW R. FLORES & KATHRYN K. O’NEILL, WILLIAMS INST., *HOW MANY ADULTS AND YOUTH IDENTIFY AS TRANSGENDER IN THE UNITED STATES?* (June 2022), <https://williamsinstitute.law.ucla.edu/publications/trans-adults-united-states/>

¹⁰ Press Release, Williams Inst., *1.2 Million Adults in the U.S. Identify as Nonbinary* (June 21, 2021), <https://williamsinstitute.law.ucla.edu/press/lgbtq-nonbinary-press-release/>; See also BIANCA D.M. WILSON & ILAN MEYER, WILLIAMS INST., *NONBINARY LGBTQ ADULTS IN THE U.S.* (JUNE 2021), <https://williamsinstitute.law.ucla.edu/publications/nonbinary-lgbtq-adults-us/>. This study used data sources from both cisgender and transgender LGBTQ community members.

¹¹ *Id.*

¹² See interACT, *What is intersex?* INTERACTADVOCATES.ORG; HUMAN RIGHTS CAMPAIGN, *Understanding the Intersex Community*, <https://www.hrc.org/resources/understanding-the-intersex-community>.

¹³ M. Blackless, et al., *How Sexually Dimorphic Are We? Review and Synthesis*, 12 AM. J. OF HUM. BIOLOGY 151-66 (2000). [https://doi.org/10.1002/\(SICI\)1520-6300\(200003/04\)12:2<151::AID-AJHB1>3.0.CO;2-F](https://doi.org/10.1002/(SICI)1520-6300(200003/04)12:2<151::AID-AJHB1>3.0.CO;2-F)

¹⁴ U.S. DEP’T OF HEALTH & HUM. SERVS., OFF. OF THE ASSISTANT SEC’Y FOR HEALTH, *Advancing Health Equity for Intersex Individuals* (2025), <https://interactadvocates.org/wp-content/uploads/2025/01/intersex-health-equity-report.pdf>.

We also know from the data that this population is remarkably diverse and their experiences are not uniform but, rather, are shaped by factors such as race, ethnicity, socioeconomic status, geographical location, primary language, education, disability, religion, family composition, and age.¹⁴

II. There are Substantial Differences in How Current Events Affect People of Different Sexual Orientations and Gender Identities

The Census Bureau's February 28 Federal Register Notice stated that the April HTOPS will include questions on "current events" that were previously asked in the HPS.¹⁵ These events include "...natural disaster events or other social or economic events facing the nation or a significant portion of the nation."¹⁶ Research – including invaluable studies using HPS data -- has shown that sexual orientation and gender identity are linked to differential outcomes in several areas related to current events, including economic disparities,¹⁷ food security,¹⁸ housing and homelessness,¹⁹ climate change,²⁰ geography and migration,²¹ access to voting,²² and civic engagement in general.²³ It is therefore likely that the Bureau would continue to find significant differences in outcomes between respondents of different sexual orientations and gender identities regarding current events, as observed during the COVID-19 pandemic.²⁴ This information will

¹⁴ INST. OF MED., *The Health of Lesbian, Gay, Bisexual, and Transgender People: Building a Foundation for Better Understanding* (2011), <http://www.iom.edu/Reports/2011/The-Health-of-Lesbian-Gay-Bisexual-and-Transgender-People.aspx>.

¹⁵ 90 Fed. Reg. 10,879.

¹⁶ *Id.*

¹⁷ See e.g. B.D.M. WILSON, ET AL., LGBT POVERTY *supra* note 4; C.R. Surfus, *The COVID-19 Impact on Employment for LGBT Individuals with Disabilities: An Examination of the 2021 Household Pulse Survey*, 35(4) J. DISABILITY POL'Y STUD. 218 (2023), <https://doi.org/10.1177/10442073231205605>; C.S. Carpenter, M. J. Lee & L. Nettuno, *Economic Outcomes for Transgender People and Other Gender Minorities in the United States: First Estimates from a Nationally Representative Sample*, S. ECON. J. (2022), <https://doi.org/10.1002/soej.12594>.

¹⁸ See e.g. KERITH J. CONRON, ET AL., WILLIAMS INST., FOOD INSUFFICIENCY AMONG LGBT ADULTS DURING THE COVID_19 PANDEMIC (2022), <https://williamsinstitute.law.ucla.edu/publications/lgbt-food-insufficiency/>; MORIAH L. MACKLIN, ELANA REDFIELD, & KERITH J. CONRON, WILLIAMS INST., FOOD INSUFFICIENCY AMONG LGBT YOUTH (2023), <https://williamsinstitute.law.ucla.edu/publications/food-insecurity-lgbtq-youth/>; I.S. Leslie, J. Carson & A. Bruce, *LGBTQ+ Food Insufficiency in New England*, 40 AGRIC. & HUM. VALUES 1039 (2023), <https://doi.org/10.1007/s10460-022-10403-5>.

¹⁹ See e.g. BIANCA D.M. WILSON, KATHRYN O'NEILL, & LUIS A. VASQUEZ, WILLIAMS INST., LGBT RENTERS AND EVICTION RISK (2021), <https://williamsinstitute.law.ucla.edu/publications/lgbt-renters-and-eviction-risk/>; ADAM P. ROMERO, SHOSHANA K. GOLDBERG, & LUIS A. VASQUEZ, WILLIAMS INST., LGBT PEOPLE AND HOUSING AFFORDABILITY, DISCRIMINATION, AND HOMELESSNESS (2020), <https://williamsinstitute.law.ucla.edu/publications/lgbt-housing-instability/>; BIANCA D.M. WILSON, ET AL., WILLIAMS INST., HOMELESSNESS AMONG LGBT ADULTS IN THE U.S. (2020), <https://williamsinstitute.law.ucla.edu/publications/lgbt-homelessness-us/>; Katie Visalli, Aniket Mehrotra, Todd Hill & Matthew Pruitt, *Three Trends in LGBTQ+ Homeownership Gaps Underscore Research and Policy Needs*, URBAN INST., (2023), <https://www.urban.org/sites/default/files/2024-02/Three%20Trends>; S.F. Small, *Gender Marker Laws and Access to Emergency Rental Assistance for Transgender Renters in the United States During COVID-19*, HOUSING POLICY DEBATE (2024), <https://doi.org/10.1080/10511482.2024.2365255>.

²⁰ See e.g. LINDSAY MAHOWALD & ARI SHAW, WILLIAMS INST., CLIMATE CHANGE RISK FOR LGBT PEOPLE IN THE UNITED STATES (2024), <https://williamsinstitute.law.ucla.edu/publications/climate-change-risk-lgbt/>.

²¹ L.A. Brady, C.A. Julian & W.D. Manning, *Variation Between LGBT Estimates and State Policy Context*, 44(1) POPUL. RES. POL'Y Rev. 11 (2025), <https://doi.org/10.1007/s11113-025-09938-2>; HUMAN RIGHTS CAMPAIGN, *Impact of Gender-Affirming Care Bans on LGBTQ+ Adults*, (2023), <https://hrc-prod-requests.s3-us-west-2.amazonaws.com/GAC-Ban-Memo-Final.pdf>.

²² See e.g. JODY L. HERMAN, ET AL., WILLIAMS INST., THE POTENTIAL IMPACT OF VOTER IDENTIFICATION LAWS ON TRANSGENDER VOTERS IN THE 2024 ELECTION (2024), <https://williamsinstitute.law.ucla.edu/publications/trans-voter-id-impact/>.

²³ See e.g., ADVOCATES FOR TRANS EQUALITY EDUC. FUND, *Civic Engagement in the 2022 U.S. Transgender Survey* (2024), https://transequality.org/sites/default/files/2024-08/USTS_2022CivicEngagementReport_Final.pdf.

²⁴ See e.g. B. D.M. WILSON, ET AL., LGBT POVERTY, *supra* note 4; T. File, *supra* note 4; A.B. D'Angelo, et al., *supra* note 4; E. Martell & Leanne Roncolato, *Economic Vulnerability of Sexual Minorities: Evidence from the U.S. Household Pulse Survey*, 42

enhance the Bureau's ability to capture more comprehensive data, providing a deeper understanding of how these characteristics impact relevant societal outcomes, and thus “help federal and state officials direct aid, assistance, and support to the people and places that need it most.”²⁵

III. There are Substantial Differences in Labor Force Participation According to Sexual Orientation and Gender Identity

In the February 28 Federal Register Notice, the Bureau reported that the March HTOPS iteration will test “labor force” related questions.²⁶ This collection was adjusted in a subsequent notice to take place in the May iteration of HTOPS.²⁷ This content is expected to be used to “test a series of questions that are being designed for production use in the Survey of Income and Program Participation (SIPP) labor force module.”²⁸ Evidence suggests there are substantial differences in economic outcomes for people of different sexual orientations and gender identities²⁹ including related to labor force participation,³⁰ the impact of which HTOPS is ideally positioned to investigate.

In the U.S., over 8 million workers identify as LGBTQ.³¹ Recent HPS data showed that among employed LGBT people, one in four (24%) worked in the public or nonprofit sectors.³² A 2023 study found that nearly 8% (169,000) of federal employees identified as LGBTQ.³³ Evidence shows that lesbian and bisexual women have higher labor force participation rates than straight women, and gay men have higher participation rates than heterosexual and bisexual men.³⁴

POPUL. RES. POLICY REV. 28 (2023), <https://doi.org/10.1007/s11113-023-09778-y>; L.A. Drabble & M.J. Eliason, *Introduction to Special Issue: Impacts of the COVID-19 Pandemic on LGBTQ+ Health and Well-Being*, 68(4) J. HOMOSEXUALITY 545 (2021), <https://doi.org/10.1080/00918369.2020.1868182>; S.E. Moore, et al., *Disproportionate Impact of the COVID-19 Pandemic on Perceived Social Support, Mental Health and Somatic Symptoms in Sexual and Gender Minority Populations*, 68 J HOMOSEX. 4 (2021), <https://doi.org/10.1080/00918369.2020.1868184>; J. Park & B. Kim, *Heterogeneous Associations Between Pandemic-Induced Socioeconomic Hardships and COVID-19 Vaccine Uptake by Sexual Orientation and Gender Identity*, 12(11) VACCINES 1277 (2024), <https://doi.org/10.3390/vaccines12111277>; E.S. Jablonski, C.R. Surfus & M. Henly, *Full-Time Caregiving During COVID-19 Based on Minority Identifications, Generation, and Vaccination Status*, 40 RES. SOCIOL. HEALTH CARE 43 (2023), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11872232/>

²⁵ U.S. Census Bureau, Household Trends and Outlook Pulse Survey (HTOPS), <https://www.census.gov/programs-surveys/htops.html>. (Mar. 26, 2025).

²⁶ 90 Fed. Reg. 10,879.

²⁷ 90 Fed. Reg. 13,731 (Mar. 26, 2025).

²⁸ 90 Fed. Reg. 10,879; The SIPP does not ask about sexual or gender identity but does allow for same sex partnership identification. See, e.g. WILLIAMS INST. SCHOLARS, PUBLIC COMMENT: SURVEY OF INCOME AND PROGRAM PARTICIPATION (OMB Control No. 0607-1000) (Sept. 18, 2022), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Comment-SIPP-Sep-2022.pdf>.

²⁹ See e.g. BIANCA D.M. WILSON, ET AL., LGBT POVERTY IN THE UNITED STATES, *supra* note 4.

³⁰ HUMAN RIGHTS CAMPAIGN, *The Lives and Livelihoods of Many in the LGBTQ Community Are at Risk Amidst COVID-19 Crisis*, (Mar. 2020), <https://hrc-prod-requests.s3-us-west-2.amazonaws.com/files/assets/resources/COVID19-IssueBrief-032020>

³¹ KERITH J. CONRON & SHOSHANA K. GOLDBERG, WILLIAMS INST., LGBT PEOPLE IN THE US NOT PROTECTED BY STATE NON DISCRIMINATION STATUTES (2020), <https://williamsinstitute.law.ucla.edu/publications/lgbt-nondiscrimination-statutes/>.

³² BRAD SEARS, WILLIAMS INST., THE IMPACT OF CHANGES TO FEDERAL STUDENT LOAN PROGRAMS ON LGBTQ ADULTS (2025), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Federal-Student-Loan-Changes-Mar-2025.pdf>.

³³ BRAD SEARS, WILLIAMS INST., THE IMPACT OF PROPOSED CUTS TO FEDERAL WORKFORCE ON LGBTQ EMPLOYEES (2025), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Federal-Workforce-Reduction-Jan-2025.pdf>.

³⁴ M. V. Lee Badgett, Christopher S. Carpenter & Dario Sansone, *LGBTQ Economics*, 35 J. ECON. PERSP. 141 (2021), <https://doi.org/10.1257/jep.35.2.141>.

Similarly, same sex couples have higher participation rates than different sex couples.³⁵ Transgender individuals have participation rates similar to those of cisgender individuals.³⁶ Despite similar or higher labor force participation, research has found that LGBT workers face lower wages,³⁷ household income,³⁸ and higher rates of job loss,³⁹ unemployment,⁴⁰ and poverty⁴¹ compared to non-LGBT workers. Research using HPS data, in particular, has helped shed light on these types of differences in the labor market.⁴² Accordingly, future HTOPS collections are likely to reveal similar, important differences if these demographic characteristics are studied, capturing key trends and better informing policies and resource allocation by federal and state governments.

IV. Evidence Supports Continued Inclusion of SOGI Measures on HTOPS and other Federal Surveys

There is a strong evidence base demonstrating the importance of including sexual orientation and gender identity (SOGI) measures on federal surveys, along with outlining best practices for their implementation. SOGI measures have been implemented and evaluated on community surveys, privately funded surveys, and some government-funded population surveys for decades.⁴³ In March 2022, after convening a panel of experts, the National Academies of Sciences, Engineering and Medicine released a consensus report documenting the results of a rigorous evaluation of sex, sexual orientation and gender identity measures, identifying best practices for population surveys (“NASEM Report”).⁴⁴ Notably, the study advocates for the adoption of measures that allow self-identification of gender in all contexts.⁴⁵ The NASEM Report can and should be considered a model for agencies when designing surveys.⁴⁶ Evidence also suggests that inclusion of SOGI does not impair the efficiency or effectiveness of surveys.⁴⁷

³⁵ M. V. Lee Badgett et al., *A Review of the Economics of Sexual Orientation and Gender Identity*, 62 J. ECON. LIT. 948 (2024), <https://doi.org/10.1257/jel.20231668>

³⁶ M. V. L. Badgett et al., *supra* note 34.

³⁷ *Id.*

³⁸ L. Anderson, T. File, J. Marshall, K. McElrath & Z. Scherer, *New Household Pulse Survey Data Reveal Differences Between LGBT and Non-LGBT Respondents During COVID-19 Pandemic*, U.S. CENSUS BUREAU (2021), <https://web.archive.org/web/20250124091824/https://www.census.gov/library/stories/2021/11/census-bureau-survey-explores-sexual-orientation-and-gender-identity.html> (original link broken since 2025 EO’s).

³⁹ Raksha Koppam, *New U.S. Census Bureau Data Show Significant Economic Disparities Among the LGBTQ+ Community*, WASH. CTR. FOR EQUITABLE GROWTH (2022), <https://equitablegrowth.org/new-u-s-census-bureau-data-show-significant-economic/>

⁴⁰ See e.g. K. J. CONRON, ET AL., *FOOD INSUFFICIENCY AMONG LGBT ADULTS*, *supra* note 18.

⁴¹ *Id.*

⁴² See e.g. Caroline Medina, Lindsay Mahowald & Rose Khattar, *Fact Sheet: LGBT Workers in the Labor Market*, CTR. FOR AM. PROGRESS (2022), <https://www.americanprogress.org/article/fact-sheet-lgbt-workers-in-the-labor-market/>

⁴³ ILAN H. MEYER & LAUREN J.A. BOUTON, WILLIAMS INST., *Impact of Executive Orders on Access to Federal Data* (2025), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/SOGI-Data-Removal-EO-Feb-2025.pdf>.

⁴⁴ MEASURING SEX, GENDER IDENTITY, AND SEXUAL ORIENTATION FOR THE NATIONAL INSTITUTES OF HEALTH, NAT’L ACADEMIES OF SCIENCES, ENGINEERING, & MED. (2022), <https://www.nationalacademies.org/our-work/measuring-sex-gender-identity-and-sexual-orientation-for-the-national-institutes-of-health>.

⁴⁵ See *Id.*, at 8-9, 37, and 103-138.

⁴⁶ OFF. MGMT. & BUDGET, RECOMMENDATIONS ON THE BEST PRACTICES FOR THE COLLECTION OF SEXUAL ORIENTATION AND GENDER IDENTITY DATA ON FEDERAL STATISTICAL SURVEYS (2023), <https://www.whitehouse.gov/wp-content/uploads/2023/01/SOGI-Best-Practices.pdf>; OFF. SCI. & TECH. POLICY, FEDERAL EVIDENCE AGENDA ON LGBTQI+ EQUITY (2023), <https://www.whitehouse.gov/wp-content/uploads/2023/01/Federal-Evidence-Agenda-on-LGBTQI-Equity.pdf>.

⁴⁷ S. Cahill, et al., *Do Ask, Do Tell: High Levels of Acceptability by Patients of Routine Collection of Sexual Orientation and*

The progenitor to HTOPS, the HPS, included questions about sexual orientation and gender identity starting with phase 3.2 in 2021.⁴⁸ It was the first Census Bureau survey to directly include both sexual orientation and gender identity questions.⁴⁹ With these data, researchers were able to track detailed demographic, economic and health-related experiences of individuals based on these characteristics.⁵⁰ However, the Bureau has indicated that it intends to remove the question set that allows for measuring transgender status.⁵¹

V. Conclusion

The Bureau proposes to explore several areas of economic and social interest in upcoming iterations of HTOPS. Existing evidence suggests that differential outcomes may emerge in these areas when evaluating data across sexual orientation and gender identity. Insight into these differences, through the continued inclusion of SOGI measures, could improve the ability of lawmakers, policymakers, researchers and the general public to better understand and address the wellbeing of the American population.

The Williams Institute appreciates the opportunity to submit this comment as the Department considers its plans for upcoming HTOPS collections. Please contact us if you would like to discuss our submission or have any questions.

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⁴⁸ See U.S. CENSUS BUR., *Household Pulse Survey Updates Sex Question, Now Asks About Sexual Orientation and Gender Identity*, <https://content.govdelivery.com/accounts/USCENSUS/bulletins/2eb7e85> (link broken most likely due to 2025 EO's).

⁴⁹ See Caroline Medina & Lindsay Mahowald, *Collecting Data About LGBTQI+ and Other Sexual and Gender-Diverse Communities*, CTR. FOR AM. PROGRESS (2022), <https://www.americanprogress.org/article/collecting-data-about-lgbtqi/>

⁵⁰ See e.g. K. J. CONRON, ET AL., *FOOD INSUFFICIENCY*, *supra* note 18; JODY L. HERMAN & KATHRYN K. O'NEILL, WILLIAMS INST., *WELL-BEING AMONG TRANSGENDER PEOPLE DURING THE COVID-19 PANDEMIC: TRANSGENDER PULSE TOPLINES* (2022), <https://williamsinstitute.law.ucla.edu/publications/trans-well-being-covid/>; LAUREN J.A. BOUTON, AMANDA M. BRUSH & ILAN H. MEYER, WILLIAMS INST., *LGBT ADULTS AGED 50 AND OLDER IN THE U.S. DURING THE COVID-19 PANDEMIC*, (2023), <https://williamsinstitute.law.ucla.edu/publications/older-lgbt-adults-us/>; M. E. Martell et al., *supra* note 23; Morgan Flood, *Research on Food Insecurity and Insufficiency in the LGBTQ+ Community*, CENTRAL PENN. FOOD BANK, <https://www.centralpafoodbank.org/policy-blog-research-on-food-insecurity-and-insufficiency-in-the-lgbtq-community/>; Christopher S. Carpenter, Maxine J. Lee & Laura Nettuno, *Gender Minority Status and Family Inequality in the United States*, 11(2) J. SOC. SCI. 65 (2025), <https://doi.org/10.7758/RSF.2025.11.2.04>.

⁵¹ U.S. CENSUS BUR., *HTOPS Non-substantive Change Request Submission_2.14.25*, OMB: 0607-1029, <https://omb.report/icr/202502-0607-003/doc/152412000>.

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