

**Draft ICR request -- High-Frequency Surveys Program/Household Pulse Survey (OMB Control #: 0607–XXXX)**

Andrew Reamer <areamer@gwu.edu>

Thu 8/17/2023 10:19 AM

To: Cassandra Logan (CENSUS/ADDP FED) <Cassandra.Logan@census.gov>

Cc: PRAcomments <PRAcomments@doc.gov>

Dear Ms. Logan,

On behalf of the American Economic Association (AEA) and the Industry Studies Association (ISA), I request a copy of the draft ICR for the High-Frequency Surveys Program/Household Pulse Survey (OMB Control #: 0607–XXXX), as invited by the August 17 [Federal Register](#). Thank you--we look forward to seeing the draft data collection instrument and supporting statement.

In the meantime, I've posted the following for AEA and ISA members <https://www.aeaweb.org/forum/3954/frequency-surveys-program-household-comments-invited-renewal> and am happy to revise on the receipt of the draft ICR materials.

Sincerely,

Andrew Reamer  
Research Professor  
George Washington Institute of Public Policy  
George Washington University

805 21 St., NW, Room 613  
Washington, DC 20052

[areamer@gwu.edu](mailto:areamer@gwu.edu)  
(202) 994-7866



To: Cassandra Logan  
Survey Director, U.S. Census Bureau  
[Cassandra.Logan@census.gov](mailto:Cassandra.Logan@census.gov)

RE: High-Frequency and Rapid Response Surveys/Household Pulse Survey

Cassandra,

The [Census Bureau's Household Pulse Survey](#) has been an invaluable resource for legislative decision-making regarding housing in our state. Data obtained from the Pulse Survey provides information on the number of people behind on rent, whether they have been able to access assistance, whether they feel that they are likely to experience an eviction, whether they have had to rely on savings, credit cards or family to make ends meet, and whether they have been forced to move because of a rent increase. No other publicly accessible survey gives legislators this kind of insight.

As we move forward with housing policy advances and budget investments, the continuation of this survey is vital to the development of informed leadership strategies and the wellbeing of Washington residents. We, the undersigned, strongly encourage the Census Bureau to continue collecting this critical data.

A handwritten signature in black ink, appearing to read "Strom Peterson".

*Representative Strom Peterson*

Housing Committee Chair

Washington State House of Representatives | 21st Legislative District  
324 John L. O'Brien Building | Olympia, WA 98504 | 360.786.7950

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21<sup>ST</sup> LEGISLATIVE DISTRICT  
**STROM H. PETERSON**

State of  
Washington  
House of  
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**Rep. Jake Fey**  
27<sup>th</sup> Legislative District  
**Chair**, Transportation  
Environment & Energy

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**Rep. Liz Berry**  
36<sup>th</sup> Legislative District  
**Chair**, Labor & Workplace Standards  
Environment & Energy  
Transportation

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**Rep. Mia Gregerson**  
33<sup>rd</sup> Legislative District  
**Vice Chair**, Appropriations  
Rules  
State Government & Tribal Relations

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**Rep. Nicole Macri**  
43<sup>rd</sup> Legislative District  
**Vice Chair**, Appropriations  
Health Care & Wellness

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**Rep. Cindy Ryu**  
32<sup>nd</sup> Legislative District  
**Chair**, Innovation, Community & Economic  
Development, & Veterans  
Appropriations  
Consumer Protection & Business

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**Rep. Sharlett Mena**  
29<sup>th</sup> Legislative District  
**Vice Chair**, Environment & Energy  
State Government & Tribal Relations  
Transportation

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**Rep. Steve Tharinger**  
24<sup>th</sup> Legislative District  
**Chair**, Capital Budget  
Appropriations  
Health Care & Wellness

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**Rep. Alex Ramel**  
**Majority Whip**  
40<sup>th</sup> Legislative District  
Environment & Energy  
Finance  
Rules  
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**Rep. Amy Walen**  
48<sup>th</sup> Legislative District  
**Chair**, Consumer Protection & Business  
Civil Rights & Judiciary  
Finance

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**Rep. Beth Doglio**  
22<sup>nd</sup> Legislative District  
**Chair**, Environment & Energy  
Labor & Workplace Standards  
Transportation

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**Rep. Sharon Tomiko Santos**  
37<sup>th</sup> Legislative District  
**Chair**, Education  
Consumer Protection & Business  
Finance

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**Rep. Roger Goodman**  
45<sup>th</sup> Legislative District  
**Chair**, Community Safety, Justice, & Reentry  
Civil Rights & Judiciary  
Human Services, Youth, & Early Learning

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**Rep. Julia Reed**  
36<sup>th</sup> Legislative District  
**Chair**, Postsecondary Education & Workforce  
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1<sup>st</sup> Legislative District  
**Co-Chair**, Regulated Substances & Gaming  
Agriculture & Natural Resources  
Capital Budget

**Rep. Dave Paul**  
**Deputy Majority Floor Leader**  
10<sup>th</sup> Legislative District  
**Vice-Chair**, Transportation  
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**Rep. Mari Leavitt**  
**Deputy Majority Whip**  
28<sup>th</sup> Legislative District  
**Vice-Chair**, Housing  
Capital Budget  
Postsecondary Education & Workforce  
Rules

**Rep. Tana Senn**  
41<sup>st</sup> Legislative District  
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**Rep. Mary Fosse**  
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38<sup>th</sup> Legislative District  
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A handwritten signature in black ink, appearing to read "E. Alvarado".

**Rep. Emily Alvarado**  
34<sup>th</sup> Legislative District  
**Vice Chair**, Housing  
**Vice Chair**, Local government  
Capital Budget

A handwritten signature in black ink, appearing to read "Jamila Taylor".

**Rep. Jamila Taylor**  
**Majority Caucus Vice Chair**  
30<sup>th</sup> Legislative District  
**Vice Chair**, Human Services, Youth, & Early  
Learning  
Housing  
Transportation

A handwritten signature in black ink, appearing to read "M. Riccelli".

**Rep. Marcus Riccelli**  
3<sup>rd</sup> Legislative District  
**Chair**, Health Care & Wellness  
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Local government

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**Rep. April Berg**  
44<sup>th</sup> Legislative District  
**Chair**, Finance  
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Local Government

A handwritten signature in black ink, appearing to read "Bill Ramos".

**Rep. Bill Ramos**  
5<sup>th</sup> Legislative District  
**Chair**, State Government & Tribal Relations  
Community Safety, Justice, & Reentry  
Transportation

A handwritten signature in black ink, appearing to read "Vandana Slatter".

**Rep. Vandana Slatter**  
48<sup>th</sup> Legislative District  
**Chair**, Postsecondary Education & Workforce  
Appropriations  
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A handwritten signature in black ink that reads "Lillian Ortiz-Self".

**Rep. Lillian Ortiz-Self**  
**Majority Caucus Chair**  
21<sup>st</sup> Legislative District  
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Human Services, Youth, & Early Learning  
Labor & Workplace Standards  
Rules

A handwritten signature in black ink that reads "Lauren Davis".

**Rep. Lauren Davis**  
32<sup>nd</sup> Legislative District  
Appropriations  
Community Safety, Justice, & Reentry  
Health Care & Wellness  
Rules

## High-Frequency and Rapid Response Surveys/Household Pulse Survey: Comments

Erica DePalma <edepalma@uswateralliance.org>

Fri 10/13/2023 9:52 AM

To: Cassandra Logan (CENSUS/ADDP FED) <Cassandra.Logan@census.gov>

Cc: PRAcomments@doc.gov <PRAcomments@doc.gov>

You don't often get email from edepalma@uswateralliance.org. [Learn why this is important](#)

Dear Cassandra,

On the Household Pulse Survey, I saw that there were a few questions related to energy bills:

- HSE10 In the last 12 months, how many months did your household reduce or forego expenses for basic household necessities, such as medicine or food, to pay an energy bill?
- HSE12 In the last 12 months, how many times was your household unable to pay an energy bill or unable to pay the full bill amount?

I would like to comment the value of replicating the above questions for **water bills**. Asking question(s) related to water bill debt would also be helpful. For example:

- In the last 12 months, how much debt has your household accrued because your household was unable to pay your water bill? (with answers ranging from a few hundred to a few thousand).

Having this information collected by the Census and publicly available for water service providers and others to access would be extremely beneficial to understand the tangible impacts that water bills have on households.

Providing reliable water and wastewater services is both expensive and imperative. If water utilities leaders and advocates have more information and data related to water bill burdens at the census level, solutions may be explored more readily, specifically to support low-income households.

Thank you for your time and consideration,  
Erica

Erica DePalma

Program Manager

[edepalma@uswateralliance.org](mailto:edepalma@uswateralliance.org)

Cell: (203)-640-8631

Pronouns: she, her, hers

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## High-Frequency and Rapid Response Surveys/Household Pulse Survey

Kasey Burton <KBurton@ccsww.org>

Mon 8/21/2023 4:38 PM

To:Cassandra Logan (CENSUS/ADDP FED) <Cassandra.Logan@census.gov>

Good afternoon,

I am submitting this comment regarding the High-Frequency and Rapid Response Surveys/Household Pulse Survey.

I am grateful for the Bureau's work to gather this data and ask that it continues to do so. As a housing advocate, the Pulse surveys provide me with invaluable information. First, it helps me understand what is happening in my community and what people are going through. It also helps my team assess and amend our priorities as needed to ensure we are providing services that address the most pressing needs in our area. Further, this data helps inform our housing and policy advocacy efforts and ensures we are providing well-informed testimony, comments, and suggestions to stakeholders, government agencies, and elected officials.

Beyond the benefit to the work I do, I firmly believe that this data collection is beneficial to the government as a whole, as it has the same needs as my organization—namely, understanding what is happening with the nation's population regarding housing issues, regular reevaluation of priorities and projects, and the opportunity to review important information to engage in properly-informed decision-making.

I therefore ask that the Census Bureau continue to gather the information collected pursuant to the Pulse surveys, as it is indispensable.

Thank you for your time,

Kasey Burton  
Senior Staff Attorney  
Tenant Law Center | Catholic Community Services of Western Washington  
100 23<sup>rd</sup> Avenue South  
Seattle, WA 98144



November 30, 2023

U.S. Census Bureau, Department of Commerce

Re: High-Frequency Surveys Program/Household Pulse Survey

To Whom It May Concern,

The First Five Years Fund (FFYF) appreciates this opportunity to comment on the [U.S. Census Bureau, Department of Commerce's proposal](#) to collect information for the High-Frequency Surveys Program/Household Pulse Survey. FFYF's mission is to ensure all children from birth through age five have equitable access to affordable, comprehensive, high-quality early care and education (ECE) to support their healthy development and help them achieve their full potential in school and life. As part of this work, we encourage practitioners and policymakers on both sides of the aisle to use ECE data to make effective decisions about serving the nation's youngest learners and their families. This includes continuous and real-time data on the availability of child care, the types of child care that families want and need, the barriers that families face in accessing care, and the impact that access to these programs has on young children's development as well as families' ability to work and maintain economic stability. FFYF relies on the U.S. Census Bureau as the benchmark for high-quality data that is essential to understanding our nation's child care landscape and improving access to quality child care. FFYF commends the U.S. Census Bureau for its work on the Count All Kids initiative to reduce the undercount of young children and particularly acknowledges the Census for its recent efforts in collecting and analyzing data on child care arrangements in the Household Pulse Survey from September to December 2022. On behalf of the ECE field, we thank you for elevating the issue in releasing the article "[Most Parents Don't Have Any Formal Child Care Arrangements](#)". Having the U.S. Census Bureau weigh in on these issues is a significant stride forward in data collection for the ECE field. FFYF looks forward to continued leadership from the U.S. Census Bureau as it pertains to prioritizing data collection on young children, particularly as it relates to child care arrangements for families with children ages five and under.

FFYF firmly supports continuing to collect questions EMP7 and EMP8 about child care arrangements and believes amending D12, and EMP 4,7, and 8, as well as adding the additional questions described below, will increase our understanding of the complex and changing issues families with children ages five and under face, and help to improve access to high-quality early learning opportunities.

The COVID-19 pandemic upended the lives of parents and children in a multitude of ways; child care programs closed, stay-at-home orders were issued in many states, and parents struggled to take care of their children while balancing work and other responsibilities. While the child care sector was already fractured, the pandemic severely disrupted the child care landscape and shined a light on the essential role that child care plays in our nation's economy. Federal child care and early learning programs are essential to help working parents find and afford the care they need to go to work and ensure their kids can thrive. Yet the high cost and limited supply of quality, reliable child care that works for parents means it can be very hard to find. Wait lists are long and care can be so expensive that many working parents simply can't afford it. According

to [Child Care Aware of America](#), the national average price of child care in 2022 was \$10,853 per year, which on average represents 10% of a two-income family's earnings and 22% of a single parent's earnings.

However, timely and comprehensive data on ECE preferences and experiences, as well as barriers to access, quality, and affordability, are often unavailable or inaccessible. Given its scope and consistent collection, the Household Pulse Survey is well-positioned to better identify and understand the current issues and gaps families experience with child care in near real-time. This data is essential to make informed policy decisions about ECE.

FFYF appreciates the inclusion of questions relating to child care and recommends amending questions D12, and EMP 4,7, and 8 (see detailed amendments below) to more specifically isolate and understand the child care experiences of families with children ages five and under. Children ages five and under experience learning in a variety of early care and education environments and their families face a different set of challenges in finding and affording care than children who are older and can participate in the K-12 school system. These young children's social development and educational progress have been particularly impacted by the COVID-19 pandemic and more research is needed to properly measure where these young children are receiving care, the types of care that families want for their young children, the barriers that families face in accessing care that works best for their family, and the impacts that child care availability and affordability have on families' employment and economic stability.

Parents rely on a range of options for early learning and care for their children ages five and under, including center-based care, such as child care centers, on-site care (in or near a workplace), preschool, faith-based programs, as well as home-based care, which may include care in a family child care home, or from a relative, nanny, au pair, or babysitter. This diverse landscape of opportunities is often referred to as a mixed-delivery system since there are numerous programs and funding sources that work together to care for children. Given the multitude of options in the early care and education landscape and in order to analyze what child care options parents want and need, particularly after COVID-19 disrupted the child care sector, it is important for these child care options to be included in the survey and analyzed distinctly.

#### FFYF Suggested Amendments

**D12 “In your household, are there... Select all that apply. Children under 5 years old? (1), Children 5 through 11 years old? (2), Children 12 through 17 years old? (3)”**

- FFYF recommends amending the following response options:
  - From “Children under 5 years old” (1) to “Children 5 years and younger” (1)
  - From “Children 5 through 11 years old” (2) to “Children 6 through 11 years old” (2)

Justification: Child care and early learning programs serve children through their 5th year. In order for the ECE community to fully utilize the data efforts underway by the U.S. Census Bureau it is imperative to include 5-year-olds in the young children category. This aligns with the ECE sector's definition of serving children from birth through age five.



**EMP4 “What is your main reason for not working for pay or profit?”**

- FFYF recommends amending the response option from “I am/was caring for children not in school or daycare” to “I chose to care for my children not in school or daycare”.
- Additionally, FFYF recommends adding “I couldn’t find or afford child care” as one of the response options to this question.

Justification: Adding this option will help to distinguish parents who have stepped out of the labor force because they want to be the primary caregivers for their children from parents who want to work for pay or profit but can’t because they face barriers accessing child care. This is essential to understand the impact that lack of access to child care has on employment.

**EMP7 “Next, we are going to ask about the childcare arrangements for children in the household. At any time in the last 4 weeks, were any children in the household unable to attend daycare or another childcare arrangement as a result of child care being closed, unavailable, unaffordable, or because you are concerned about your child’s safety in care? Please include before school care, after school care, and all other forms of childcare that were unavailable.**

- For respondents who answered “Yes” to EMP7, FFYF recommends adding the question “What is the age(s) of the child(ren) who was unable to attend daycare or another childcare arrangement as a result of child care being closed, unavailable, unaffordable, or because you are concerned about your child’s safety in care?” Respondents may select more than one of the following: 0 to 3 years old (1), 3 through 5 years old (2), 6 through 11 years old (3), and 12 through 17 years old (4).

Justification: Adding this clarifying question will isolate the difficulty of accessing child care for families with children ages five and under from that of older children who can participate in the K-12 school system. Additionally, we know there is a pervasive need for infant and toddler care options. Including the 0 to 3 age range in this question would help further stratify that population, as they have unique needs.

- After this question, if a respondent selected that they have a child who is “0 to 3 years old” or “3 through 5 years old”, FFYF recommends adding the following question, “What was/is the primary reason this child was unable to attend daycare or another child care arrangement?” Select one among the following: It was closed (1), There were no more available slots (2), It was unaffordable (3), I was concerned about my child’s safety in care (4), It was not conveniently located (5), The available hours did not fit my family’s schedule (5), Other reason, please specify \_\_\_\_\_ (6).

Justification: There are a variety of different barriers families face when accessing child care. Adding this question will help to identify the most prominent barriers that families with young children face in near real-time, which is vital to inform federal policy solutions to improve access to quality child care.

**EMP8 “Which if any of the following occurred in the last 4 weeks as a result of childcare being closed, unavailable, unaffordable, or because you are concerned about your child’s safety in care?”**

- FFYF recommends subsequently adding the question “The affected child(ren)is/are:” Respondents may select more than one of the following: 0 to 3 years old (1), 3 through 5 years old (2), 6 through 11 years old (3), and 12 through 17 years old (4).



Justification: Adding this question is necessary to better understand the particular impact that child care options for young children have on parents' employment and economic stability.

**In addition to the above amendments to questions D12 and EMP 4,7, and 8, FFYF recommends adding the following questions after EMP8. Given the following questions focus on child care arrangements for families with children ages 5 and under, we recommend adding a section entitled “Child Care for Young Children” and making them available to respondents who selected “Children 5 years and younger” in question D12:**

This section includes questions on child care arrangements for families with children ages 5 and under.

- CARE1. Where is/are your child(ren) age five and under being cared for? Respondents may select more than one of the following: My partner or I care for my child (1), Family member, friend, or neighbor (2) Child care center (3), Family child care home (4), Faith-based program (5), Nanny, au pair, or babysitter (6), Head Start (7) Public Pre-K (8), Other, please specify \_\_\_\_ (9)
- CARE2. Are you satisfied with your current child care arrangement? Respondents must select one of the following: Yes (1), No (2), Unsure (3)
- CARE3. Have you had to change your child care arrangement in the last 2 months? Respondents must select one of the following: Yes (1), No (2)
- CARE4. If selected “Yes” to CARE3- What was the reason? Respondents may select more than one of the following: Previous child care closed (1), Previous child care was unaffordable (2), Previous child care was too far away or inaccessible (3), Previous child care did not fit the hours we needed care (4) I was concerned about my child’s safety in previous child care (5), We found child care that better fit our needs (6), We moved (7) Other, please specify \_\_\_\_ (8)
- CARE5. What are the barriers to getting the child care you need/prefer? Respondents may select as many as apply: Available care is too expensive (1), Available care is not conveniently located (2) Available care doesn’t fit my family’s needs (3), Care is not available (4), Care is not available at the times I need it (5), I want to care for my child but I am unable to (6) I want my partner or a family member to care for my child but they are unable to (7), There are no barriers (8), Other, please specify \_\_\_\_ (9)
- CARE6. What trade-offs have you had to make to access the care you have? Respondents may select as many as apply: I am borrowing money or using my savings to pay for child care (1), I have to arrive at work late or leave early to accommodate my current child care arrangement (2), I have to drive far distances to access child care (3), I had to turn down a promotion because my child care cannot cover more hours (4), I had to quit my job to care for my child (5), I have to work more/longer hours to afford child care (6), I am not making any tradeoffs (7) Other, please specify \_\_\_\_ (8)
- CARE7. How difficult was it to find child care that works for your family? Respondents must select one of the following: Not difficult (1), Somewhat difficult (2), Very difficult (3), Unable to find child care due to difficulty (4), Did not try to find child care (5)
- CARE8. How do you pay for child care? Respondents must select one of the following: I pay entirely out-of-pocket (1), I receive a subsidy voucher to attend a child care program (2), I receive free child care through Head Start (3), I receive free child care through a public Pre-K program (4) I do not pay for child care (5)

FFYF firmly believes that continuous, quality data collection through surveys is crucial to understanding the experiences of young children and their families and equipping leaders and policymakers with the information needed to improve the child care system. We appreciate your consideration of these comments and welcome further conversations and your partnership. If



you have any questions or if we can provide additional information, please do not hesitate to reach out to Amanda Guarino, Managing Director, Policy and National Partnerships, at [aguarino@ffyf.org](mailto:aguarino@ffyf.org).

Sincerely,

A handwritten signature in black ink that reads "Amanda Guarino". The signature is fluid and cursive, with the first name "Amanda" and last name "Guarino" clearly distinguishable.

Amanda Guarino  
Managing Director, Policy and National Partnerships  
First Five Years Fund





1350 I STREET NW  
SUITE 700  
WASHINGTON, DC 20005  
202-588-5180  
NWLC.ORG

November 28, 2023

Sheleen Dumas  
Department PRA Clearance Officer  
Office of the Chief Information Officer  
U.S. Department of Commerce  
*Submitted via reginfo.gov*

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 Pulse Survey  
(OMB No. 0607-XXXX)

Dear Sheleen Dumas,

The National Women's Law Center (the "Center") appreciates the opportunity to comment on the Federal Register Notice (FRN) regarding the next phase of proposed changes to the U.S. Census Bureau Household Pulse Survey (the "Pulse Survey").<sup>1</sup>

The Center fights for gender justice—in the courts, in public policy, and in society—working across the issues that are central to the lives of women and girls. The Center uses the law in all its forms to change culture and drive solutions to the gender inequity that shapes society and to break down the barriers that harm everyone—especially those who face multiple forms of discrimination. For over 50 years, the Center has been on the leading edge of every major legal and policy victory for women.

Census data has been and continues to be, pivotal to the Center's research and public education efforts. The Center relies on Census data to identify the needs of women and their families, highlight the various implications of legislation, fight back against unfair practices and policies, illuminate the different ways women and girls experience life in the United States, and develop evidence-based solutions for health, education, workplace, and income security policy.

Long before the COVID-19 pandemic wreaked havoc on the already fragile child care sector, the Center spearheaded the effort to increase public understanding, support, and investments in the nation's child care infrastructure. The Pulse Survey has been a valuable source for the Center and other stakeholders, providing us with timely data on how access to child care among families with children has changed and the economic fallout from having no child care on different groups of women and families from April 2021 to August 2022 (Phases 3.1 to 3.5) and then from August to October 2023 (Phase 3.10), when child care questions were asked. To our knowledge, the Pulse Survey is the only nationally representative survey by the federal

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<sup>1</sup> Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; High-Frequency Surveys Program/Household Pulse Survey, 88 Fed. Reg. 74146 (Oct. 30, 2023), <https://www.federalregister.gov/documents/2023/10/30/2023-23896/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>.

government that provides such data in practically real-time. The Center has also used the rich demographic data in the Pulse Survey to document the disparities in child care access and the economic impacts of having no child care by gender, race, disability status, gender identity, and sexual orientation.<sup>2</sup>

Continuing the Pulse Survey and continuing to include questions on child care in future phases of the Pulse Survey will allow the Center and other stakeholders to track ongoing trends and disparities in access to child care and the economic impacts of having no child care on different groups of women and families at a critical time for the future of the child care sector. To stabilize the child care crisis exacerbated by the pandemic, Congress passed the American Rescue Plan Act (ARPA), signed into law by President Biden in March 2021, providing \$24 billion in child care stabilization grants and \$15 billion in supplemental child care discretionary funds to states.<sup>3</sup> States had until September 30, 2023, to liquidate their ARPA stabilization funds and have until September 30, 2024, to liquidate the ARPA discretionary funds. The ARPA child care stabilization fund provided critical support to child care programs, early educators, and families with young children.<sup>4</sup> However, the recent expiration of the Child Care Stabilization program raises serious questions about how early educators and families with young children will fare in the coming months while facing another child care funding cliff in September 2024.

Because it might take months—if not years—for the impact of the ARPA child care funding cliffs to take shape, we need ongoing data collection to document the impact and to help educate the public on the importance of robust, long-term public investments in the child care sector and providing systemic support for women, children, and families. The Pulse Survey already has the data infrastructure for such an undertaking and has the unique advantage of having collected data on child care arrangements and the economic impacts of having no child care before the Child Care Stabilization program ended. In addition, the Pulse Survey has rich information on a variety of topics, which can be used to examine how experiencing child care disruptions might be correlated with changes in other aspects of economic and mental well-being, as well as how disparities in child care access and stability might be exacerbated by socioeconomic status.

The Center recommends the improvements below to increase the utility of the Pulse Survey pertaining to child care:

- The Center appreciates that the Pulse Survey added back child care questions (EMP7 and EMP8) in Phase 3.10. We also appreciate that EMP4 continues to include “caring for children not in school or daycare” as a response option. We strongly recommend including these questions and response categories pertaining to child care in future phases of the Pulse Survey. This would allow advocates and researchers to track the ever-changing child care access and the economic impact of not having child care among different groups of women and families in the aftermath of the ARPA child care cliffs.
- The current Survey asks about the number of children living in a respondent’s household. Respondents in the survey may be living with children who are not their own and answering questions about those children. It would be helpful to know if the children

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<sup>2</sup> National Women’s Law Center, “High Shares of Women with Children Under 12 Lack Access to Child Care As the Child Care Funding Cliff Approaches” (September 26, 2023), <https://nwlc.org/high-shares-of-women-with-children-under-12-lack-access-to-child-care-as-the-child-care-funding-cliff-approaches/>.

<sup>3</sup> American Rescue Plan Act of 2021, Pub. L. No. 117-2, 135 Stat. 31, 207 (2021).

<sup>4</sup> The White House Council of Economic Advisers Working Paper, “Did Stabilization Funds Help Mothers Get Back to Work After the COVID-19 Recession?” (November 7, 2023), <https://www.whitehouse.gov/wp-content/uploads/2023/11/Child-Care-Stabilization.pdf>.



are one's own versus just in the household. This would permit the Center and other researchers to identify mothers who, in particular, have been disproportionately impacted by child care disruptions, instead of women with children in the household. It could also be helpful to add a question on whether a respondent is raising children in the household (and differentiated by children's age group: under 5 years old, 5-17 years old), which would allow us to identify non-parent caregivers.

- If resources allow, the Center recommends adding questions on changes in child care costs for respondents raising young children. Here are examples of sample questions:

*(Universe: Raising children under 5 years old)*

Have your child care costs increased in the last 4 weeks?

Response options (select only one):

- Yes, I am paying more for child care, and I have the same number of children in child care and the same child care arrangement as I did 4 weeks ago.
- Yes, I am paying more for child care and I have the same number of children in child care, but my child care arrangements have changed since 4 weeks ago.
- Yes, I am paying more for child care because I am paying for more children in child care than 4 weeks ago.
- No, I am paying the same amount or less for child care while using the same child care arrangements as 4 weeks ago.
- No, I am paying the same amount or less for child care because I am paying for fewer children in child care or I am no longer using the same child care arrangement that I was using 4 weeks ago.
- No, I have not been paying for child care.

*If "Yes, I am paying more for child care and I have the same number of children in child care and the same child care arrangement as I did 4 weeks ago" or "Yes, I am paying more for child care and I have the same number of children in child care, but my child care arrangements have changed since 4 weeks ago":*

How much have your child care costs increased?

\$\_\_\_\_\_ per week

Thank you for the opportunity to submit these comments on this important information collection. If you have questions, please contact Melissa Boteach at [mboteach@nwlc.org](mailto:mboteach@nwlc.org), Karen Schulman at [kschulman@nwlc.org](mailto:kschulman@nwlc.org), Whitney Pesek at [wpesek@nwlc.org](mailto:wpesek@nwlc.org), and/or Shengwei Sun at [ssun@nwlc.org](mailto:ssun@nwlc.org).

Sincerely,



Melissa Boteach

Vice President for Income Security and Child Care/Early Learning



Karen Schulman  
Director of State Child Care Policy



Whitney Pesek  
Director of Federal Child Care Policy



Shengwei Sun  
Senior Research Analyst, Income Security and Child Care



# COALITION ON HUMAN NEEDS

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March 30, 2025

CHN Comments on High-Frequency Surveys Program/Household Trends and Outlook Pulse Survey (HTOPS)

Submitted via [www.reginfo.gov/public/do/PRAMain](http://www.reginfo.gov/public/do/PRAMain)

The Coalition on Human Needs (CHN) is submitting the comments below in response to the request for comments on the High Frequency Surveys Program/Household Trends and Outlook Pulse Survey published in the Federal Register on February 28, 2025, with a correction on March 26, 2025, *OMB Control Number: 0607-1029*.

The Coalition on Human Needs (CHN) is an alliance of national organizations working together to promote public policies which address the needs of low-income and other vulnerable populations. The Coalition's members include civil rights, religious, labor, and professional organizations, service providers and those concerned with the wellbeing of children, women, the elderly, and people with disabilities. The Coalition on Human Needs monitors and tracks data on human needs in the United States, including data on poverty, on policies that reduce poverty, and on hardship. The Coalition uses Census data including the American Community Survey (ACS) in its work. The Coalition is one of four organizations that formed and continues to co-lead Count All Kids, a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

CHN strongly supports the Household Trends and Outlooks Pulse Survey (HTOPS) because it offers the only national data on hardship that is near real time. CHN is grateful that the Bureau confirmed that it plans to continue collecting data on hardship. It hopes that the April topical survey data collection that includes content from the Household Pulse Survey will specifically include hardship data, and that that data will be collected regularly. CHN urges the Bureau and OMB to try to produce this data by state, at least for large states with adequate sample sizes, and for the smallest possible subnational geographic areas. We also urge the Bureau to try to

collect the data more frequently than every two months, if funding permits, particularly in areas of disasters or other major upheaval that can greatly increase hardship.

CHN also supports the HTOPS survey because it provides an important vehicle for testing possible changes to the 2030 census, the American Community Survey, SIPP, and other important demographic surveys.

We applaud the development of the original Household Pulse Survey, which was created with amazing speed on critical topics when the pandemic began. It provided essential data on how people were faring at a perilous time, when there were few or no other ways to get reliable information. The pandemic may be over, but the need for real-time data on hardship continues. Indeed, while the Household Pulse Survey was a brilliant and enormously important response to the pandemic, it also filled a long-standing need for better information on hardship. We note that it has provided data on hardship frequently and in near real time, when most other data on hardship is produced a year or more after it is collected. In some cases, such as information on how many people are struggling to keep a roof over their heads, it has provided information for which there is no comparable source even on a delayed basis. While we recognize that the Bureau can no longer continue the Household Pulse Survey in its original form because of the opposition of cell phone companies, we believe that having near real-time hardship data is invaluable and must continue. We believe that hardship data should be permanently collected and produced on a near real-time basis because no other data provides this critical information.

We also believe that this data should be produced for all states as well as the national level. We understand that the Bureau plans to start with only national data but eventually to reach a sample size that will permit data at a regional or smaller geographic level. We note that the Census Scientific Advisory Committee (CSAC) made some suggestions during the fall 2024 meeting for approaches for producing more localized data, such as aggregating data over time, and we thank the Bureau for accepting the CSAC [recommendation 49](#) to “determine how the survey may be able to support state-level estimates”, pending funding for the work.

We offer some examples of the many ways that CHN and its member organizations have used the Household Pulse Survey hardship data.

The Coalition on Human Needs (CHN) regularly used the hardship data from the Household Pulse Survey in its blogs and emails to inform policymakers, human needs advocates and the public of the extent of hardship in our country. CHN also used the hardship data in its nonpartisan voter guides, designed to encourage people to vote, and in its presentations to

advocates and policy makers. CHN also often made the state level data readily accessible to advocates to encourage the state data usage.

The National Women's Law Center (NWLC) periodically put out analyses of the Household Pulse Survey data to show the difficulty faced by women of color, women with disabilities, and LGBTQ adults in affording basic necessities such as food, housing, and child care.

Academics have also used the Pulse hardship data because it allows for pooling waves to get larger sample sizes than we often have.

We also know that state organizations rely on the state hardship data. For example, NH Hunger Solutions uses has a Dashboard on their website that includes hunger data and is updated monthly. They report that it is the best real time measure of food insecurity and report they use it constantly in their public awareness and advocacy work. San Diego for Every Child looks to the Household Pulse Survey as a truer measure of how its families are *\*actually\** doing. As an organization focused on cutting the experience of child poverty, it is not only trying to raise families above the poverty level, it is also trying to elevate quality of life. This includes the very necessary—and perhaps even more accurate—data and measures of economic and social impact on households, precisely what the HPS helps capture. The NC Budget & Tax Center regularly uses Household Pulse Survey to analyze the prevalence of hardship among NC families in real time. The Center for the Advancement of Women at Mount St. Mary's University used the hardship data in its 2021 Report on the Status of Women and Girls in California. Similarly, LGBTQ+ organizations use the state level data: for example, in Minnesota they use the Pulse survey to assess a variety of aspects of life including housing hardship.

Because we believe that the Household Pulse Survey is a unique, invaluable, and necessary measure of hardship, we applaud the decision to keep continuing to collect hardship data in HTOPS and urge you to work towards collecting and reporting this data at or near state levels.

We also note that HTOPS provides an important tool for assessing potential changes to other surveys. We note that the topical survey that was fielded in January included a household roster update. We support the use of HTOPS for testing other approaches that might improve the count of young children.

For these reasons, CHN supports the HTOPS survey collection of hardship data and hopes it can be expanded sufficiently to produce state as well as national data. It also supports the use of the HTOPS survey to test innovation in other Census products.

Thank you for the opportunity to submit these comments. Please direct any questions to Deborah Weinstein at [dweinstein@chn.org](mailto:dweinstein@chn.org).

A handwritten signature in blue ink, appearing to read "Deborah Weinstein", with a long, sweeping horizontal line extending to the right.

Deborah Weinstein  
Executive Director, CHN

**Author Full Name :** Kelly Moore**Received Date :** 03/02/2025 10:26 PM**Comments Received :**

Unsure of what the actual reason for this change for a generation of a new Census collection would be for and what the overall impact of this new data collection would mean to the public. It would make sense for a new survey that would show the number of people who have been affected by the pandemic and how many people have had the most adverse reactions from it. The results are not so clear and there are many other factors that can affect how people are impacted in this study.

March 27, 2025

Sheleen Dumas

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.<sup>1</sup>

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."<sup>2</sup> 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.<sup>3</sup> Historically, the Household Pulse Survey (HPS) has been a vital tool for researchers and policymakers to examine these differences

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<sup>1</sup> 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/>

<sup>2</sup> 90 Fed. Reg. 10,879.

<sup>3</sup> 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.<sup>4</sup> As HTOPS has replaced the HPS,<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup> We estimate that approximately 1.3 million adults aged 18 and older identify as transgender.<sup>8</sup>
- Approximately 1.2 million LGBTQ adults identify as nonbinary in the U.S.<sup>9</sup> Nonbinary refers to a gender identity that is not strictly “Male” nor “Female.”<sup>10</sup>
- “Intersex” refers to people whose sex characteristics do not fall into the typical binary categories of male and female.<sup>11</sup> 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.<sup>12</sup> The Department of Health and Human Services estimates that up to 5 million people in the U.S. may be intersex.<sup>13</sup>

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<sup>4</sup> 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>.

<sup>5</sup> 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).

<sup>6</sup> 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>.

<sup>6</sup> 90 Fed. Reg. 10879.

<sup>7</sup> 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>

<sup>8</sup> 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/>

<sup>9</sup> 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.

<sup>10</sup> *Id.*

<sup>11</sup> See interACT, *What is intersex?* INTERACTADVOCATES.ORG; HUMAN RIGHTS CAMPAIGN, *Understanding the Intersex Community*, <https://www.hrc.org/resources/understanding-the-intersex-community>.

<sup>12</sup> 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)

<sup>13</sup> 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.<sup>14</sup>

## 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.<sup>15</sup> These events include “...natural disaster events or other social or economic events facing the nation or a significant portion of the nation.”<sup>16</sup> 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,<sup>17</sup> food security,<sup>18</sup> housing and homelessness,<sup>19</sup> climate change,<sup>20</sup> geography and migration,<sup>21</sup> access to voting,<sup>22</sup> and civic engagement in general.<sup>23</sup> 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.<sup>24</sup> This information will

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<sup>14</sup> 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>.

<sup>15</sup> 90 Fed. Reg. 10,879.

<sup>16</sup> *Id.*

<sup>17</sup> 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>.

<sup>18</sup> 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>.

<sup>19</sup> 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>.

<sup>20</sup> 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/>.

<sup>21</sup> 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>.

<sup>22</sup> 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/>.

<sup>23</sup> 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](https://transequality.org/sites/default/files/2024-08/USTS_2022CivicEngagementReport_Final.pdf).

<sup>24</sup> 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.”<sup>25</sup>

### 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.<sup>26</sup> This collection was adjusted in a subsequent notice to take place in the May iteration of HTOPS.<sup>27</sup> 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.”<sup>28</sup> Evidence suggests there are substantial differences in economic outcomes for people of different sexual orientations and gender identities<sup>29</sup> including related to labor force participation,<sup>30</sup> the impact of which HTOPS is ideally positioned to investigate.

In the U.S., over 8 million workers identify as LGBTQ.<sup>31</sup> Recent HPS data showed that among employed LGBT people, one in four (24%) worked in the public or nonprofit sectors.<sup>32</sup> A 2023 study found that nearly 8% (169,000) of federal employees identified as LGBTQ.<sup>33</sup> 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.<sup>34</sup>

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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/>

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

<sup>26</sup> 90 Fed. Reg. 10,879.

<sup>27</sup> 90 Fed. Reg. 13,731 (Mar. 26, 2025).

<sup>28</sup> 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>.

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

<sup>30</sup> 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>

<sup>31</sup> 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/>.

<sup>32</sup> 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>.

<sup>33</sup> 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>.

<sup>34</sup> 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.<sup>35</sup> Transgender individuals have participation rates similar to those of cisgender individuals.<sup>36</sup> Despite similar or higher labor force participation, research has found that LGBT workers face lower wages,<sup>37</sup> household income,<sup>38</sup> and higher rates of job loss,<sup>39</sup> unemployment,<sup>40</sup> and poverty<sup>41</sup> compared to non-LGBT workers. Research using HPS data, in particular, has helped shed light on these types of differences in the labor market.<sup>42</sup> 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.<sup>43</sup> 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”).<sup>44</sup> Notably, the study advocates for the adoption of measures that allow self-identification of gender in all contexts.<sup>45</sup> The NASEM Report can and should be considered a model for agencies when designing surveys.<sup>46</sup> Evidence also suggests that inclusion of SOGI does not impair the efficiency or effectiveness of surveys.<sup>47</sup>

<sup>35</sup> 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>

<sup>36</sup> M. V. L. Badgett et al., *supra* note 34.

<sup>37</sup> *Id.*

<sup>38</sup> 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).

<sup>39</sup> 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/>

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

<sup>41</sup> *Id.*

<sup>42</sup> *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/>

<sup>43</sup> 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>.

<sup>44</sup> 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>.

<sup>45</sup> *See Id.*, at 8-9, 37, and 103-138.

<sup>46</sup> 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>.

<sup>47</sup> 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.<sup>48</sup> It was the first Census Bureau survey to directly include both sexual orientation and gender identity questions.<sup>49</sup> With these data, researchers were able to track detailed demographic, economic and health-related experiences of individuals based on these characteristics.<sup>50</sup> However, the Bureau has indicated that it intends to remove the question set that allows for measuring transgender status.<sup>51</sup>

## 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.

Respectfully Submitted,

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<sup>48</sup> 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).

<sup>49</sup> 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/>

<sup>50</sup> 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>.

<sup>51</sup> 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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