November 17, 2023

Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230
Submitted via http://www.regulations.gov

Dear Ms. Dumas,

On behalf of the Population Association of America (PAA)
(www.populationassociation.org) and the Association of Population Centers
(APC) (www.populationcenters.org), we are pleased to submit comments in
response to a *Federal Register* Notice published by the U.S. Census Bureau on
September 19, 2023, (Citation 88 FR 64404; Document Number 2023-20256)
requesting review and approval for a test of sexual orientation and gender
identity (SOGI) questions on the 2024 American Community Survey (ACS).

PAA is the premier professional, scientific society for more than 3,000 behavioral
and social scientists—including demographers, sociologists, economists,
epidemiologists, and statisticians—who study the causes and consequences of
population change. Our members conduct research and train scientists at U.S.
universities and independent research organizations. The APC is composed of
approximately 40 federally funded, interdisciplinary population research centers
nationwide. Our members are intimately involved in many methodological
aspects of the decennial U.S. Censuses, including evaluating the design,
collection, and results of the census and the substantive analysis of decennial
census data. Our members conduct independent research using data from the
Census Bureau, work for or advise federal, state, local, and tribal governments
on methodological and substantive issues with the decennial census, and
disseminate census findings to policymakers, stakeholders, and the public. Given
these important connections, our members have a high stake in ensuring the
Census Bureau data products achieve the highest possible scientific standards.

We commend the Census Bureau for testing sexual orientation and gender
identity (SOGI) questions on the 2024 American Community Survey (ACS). This
test could lead to the inclusion of SOGI questions in the ACS, which will have
several important benefits. Beyond meeting the needs of federal agencies that
have expressed interest in and identified legal uses for this information,
including civil rights and equal employment enforcement, this new information

will be valuable for obtaining a detailed and accurate picture of the U.S. population. Population scientists will be interested in using these data in their own research.

The *Federal Register* notice mentions specific interest in how the questions will perform when completed by proxy respondents, which is necessary because the ACS interviews just one respondent per household who will report on the SOGI characteristics of all household members. An important element of assessing whether proxy reports are accurate is to compare them directly to a benchmark report. In the case of SOGI, the best benchmark is likely the respondents' own self-reports. However, the follow-up reinterview will be conducted with another adult member of the household (or the same person who completed the original interview). This will only allow the Bureau to compare response reliability for proxy versus self-responses for one other person in the household. Further, this person will always be an adult, and likely an older adult, meaning that there will be no self-response option for people aged 15 to 18 years (and likely other young adults as well). For this test, the Bureau should consider obtaining a self-response to the SOGI items for each household member in order to best understand how well proxy reports on the SOGI items work for all people covered by these items.

The Census Bureau has an appropriate plan to address sensitivity around responses to the SOGI items in interviewer-led modes, particularly if other household members are present. Nevertheless, there is major concern about the potential effects of interview mode on responses to the SOGI items, especially given the privacy and confidentiality offered by two interview modes (Internet and paper) compared to the other modes (telephone and in-person) and the fact that households completing the ACS interview by Internet or paper will likely have different observed and unobserved characteristics when compared to households completing by other modes. To better understand the effects of mode on responses to the SOGI items, the Bureau should consider an explicit design to examine mode effects for these items in the ACS, which could be achieved by randomly assigning households to a particular mode of interview. Careful consideration should also be given to the reinterview mode by either matching the original interview mode or having all reinterviews completed by the same mode—ideally the mode offering greatest confidentiality and reliability.

Once again, thank you for giving the population research community an opportunity to comment on the proposed test of SOGI questions on the 2024 ACS.

Sincerely,

Dr. Lisa Berkman
2023 PAA President

Dr. Jennie Brand
2023-2024 APC President