**Comments**

The American Community Survey is seeking the public’s opinion on the implementation of additional survey questions regarding sexual orientation and gender identity. Additional data can be used for further statistical analysis on socioeconomic trends among American households, but there are potential concerns that need to be addressed to ensure accurate and useful results. The following discusses arguments for and against the proposal, as well as additional comments that might improve the program.

Regarding whether to include sexual orientation and gender identity questions, it is important to be able to gather as much data as possible for this survey. Therefore, despite personal opinions on sexual orientation and gender identity and their validity, it will apply to a lot of households to ask those questions. Gathering information on these topics can be effective in a wide range of studies, possible topics including research between teenage sexual identity and mental health, and employment or socioeconomic trends. The proposed method for respondents to answer in-person interview questions with flashcards rather than answering verbally also handles the potential issue of not wanting other household members to know about their orientation/identity. Additionally, the total cost of this addition is $0, meaning it is accessible to all respondents, adding no additional burden compared to the existing version of the survey, except time. To enhance the quality of the questions asked, the option for “I don’t know” should be considered in the survey. By omitting this option, respondents are more likely to choose an option that may not entirely align with their feelings on their sexual orientation. This especially aligns with younger respondents, as many of them may feel unsure about their identity in general. This also may skew results since many respondents who are questioning may wrongly list themselves as heterosexual. We also believe that the “I don’t know” option enhances the proposed information collection and can have a practical utility in education, research, etc. Another enhancement to the questions could be removing the “Mark all that apply'' option for gender orientation. This could be replaced by including a “gender-fluid” or having a write-in section. This could minimize confusion in interpreting responses by replacing the option with an umbrella term.

The main concerns when implementing more information into a survey have to do with ensuring the quality of the data doesn’t get hampered by too many variables. Adding the 2024 ACS Sexual Orientation and Gender Identity (SOGI) Test has an inherent subjectivity drawback to it. Asking identity-related questions can be overbearing to some respondents, which could lead to nonresponses or inaccurate responses altogether. The organizers of this proposal have discussed ways to minimize response bias by having multiple categories to choose from, such as “Male”, “Female”, “Non-binary”, etc. However, this is assuming that the respondents already have a clear idea of what they are. In some cases, the respondents might not have a set identity that they are comfortable with sharing, so the data may start to present inaccuracies. Additionally, the proposal states that they would not have a “Do not know” section to make data analysis easier; however, this could inhibit responses from the aforementioned group of people who don’t have a clear idea of what they identify as.

In many households, the head of the household or another adult is most likely the one to check the mail, pick up the home phone, complete the survey, etc. When considering the complications of proxy reporting, especially with sensitive information such as gender and sexual orientation, it becomes more evident that these questions are difficult to get accurate reporting on. This makes the information collected in this survey have less practical utility since it is less likely to accurately reflect the general population. For example, in many households, youth who may identify as gay or non-binary may not be out to the adult completing the survey. This can cause inaccurate reporting as the adult completing the survey may inaccurately list the gender and sexual orientation of other members of the household. We recommend that a shortened version of this survey be administered to secondary schools for the survey to reach underrepresented groups such as youth. This shortened version only needs to include questions specific to the youth and omit questions regarding household income, etc. to limit the time burden and maintain the accuracy of data. The version of the survey administered in schools can be sent electronically for organizational purposes. To link the response of the youth, an address box can be filled out to match the youth with the household that they belong to. This process or an alternative is important to implement since the follow-up content reinterview proposes that another adult member is asked the questions to compare the response reliability for proxy vs. self-responses. This still under-represents youth and the follow-up content reinterview may not be as effective as thought.