

We are soliciting public comments to permit the Department/Bureau to:

(a) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility.

Our position is that this new method will have practical use and long-term benefits. It is extremely necessary to present sufficient gender choices to surveyed households to ensure accurate data collection. The Williams Institute estimates 1.2 million American adults identify as nonbinary, suggesting roughly 12,600 respondents to the American Community Survey in the next year will self-identify as such. That same study suggests the vast majority of these nonbinary adults are under age 30 - and thus that the proportion of adults who identify as nonbinary is likely to continue to increase rapidly - and that these adults are more likely than average to experience financial instability, lack health insurance, and have mental health struggles. Institutional ignorance is historically used to marginalize minority communities; limiting data collection on minority groups handicaps the mechanisms by which to justify public expenditures to combat gender inequalities, or even to effectively determine the presence of such inequalities. Quantitative research with respect to minority status is the best way to identify structural inequalities and recognize that lived experiences of discrimination are not merely isolated incidents (D'Ignazio and Klein, 2020). By refusing to identify gender minorities in data collection, the United States government has been culpable in its ignorance of the economic and social hardships faced by this group, and we support this tested revision in the hopes it will mitigate this ignorance.

(b) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.

The estimated time per response and estimated total cost to the public seem to be accurate approximations of how long and how costly the survey would be for the public. It is said that the average household questionnaire will take 40 minutes to complete, and the content follow-up reinterview will take 20 minutes to complete. Given that the survey consists of multiple choice questions about an individual, it is reasonable to assume that answering all of the questions would only take 40 minutes for one response. Additionally, because the reinterview portion only consists of a subset of the ACS questions to be re-asked so it is reasonable to assume that this section will take less time to complete. It is also said that the estimated total cost to the public is \$0. Because this is looking at the cost of purchases made to complete the survey, it is reasonable to assume that no purchases will be necessary to complete the survey. The survey's accessibility through various methods, including internet and paper, allows respondents to choose the method that best suits them in terms of cost. Overall, the methodology and assumptions seem sound, considering the survey's characteristics and the flexibility provided to respondents in selecting their preferred completion method.

(c) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected.

It seems as though the Census Bureau approached these new questions very carefully, and are cautious to consider people's sensitivity and privacy. However, if there was one thing to comment on to enhance the questions asked, it would be to slightly change the options for the question asking about people's current gender. Though it makes sense to avoid using a "select all that apply" method, it is important to consider that a transgender person still identifies as "male", or "female". So, instead of having just a "transgender" option, it may be more clear to get rid of that option, and instead use "transgender man" or "transgender woman" to avoid confusion for individuals. This may seem exclusive for transgender individuals that don't identify as male or female, but that is why there are the other options for that as well: "non-binary", and "This person uses a different term". Changing the possible choices for the question in this manner allows for more information to be collected, and allows for a clearer understanding on the participant's behalf.

(d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

In order to most effectively minimize the reporting burden on all individuals, I strongly support the Census Bureau's proposal for the use of flashcards and numbered response categories for questions regarding gender and sexuality. There are many Americans, especially teenagers and young adults, who live in environments that are unsafe to disclose accurate information in. According to the 2022 National Survey on LGBTQ Youth Mental Health, less than 33% of transgender youth (between the ages of 13 and 24) feel supported and affirmed in their homes ([The Trevor Project](#)). The use of flashcards, which will keep questions private between interviewer and interviewee, will not only ensure the safety of both parties, but will also result in more accurate responses to survey questions. Without the fear of being exposed for not being heterosexual or cisgender, interviewees have fewer barriers to answering honestly. Additionally, I support the use of multiple collection methods, consistent with those used for the ACS, to collect responses for these test questions. Offering multiple ways to access the survey will allow for a wider response sample, painting a broader and more accurate picture of gender identity and sexuality in the United States.