



LGBT Technology Institute
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Kyra Linse
Acting Survey Director
Current Population Surveys
U.S. Department of Commerce
Submitted via *regulations.gov*

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Current Population Survey (CPS) Basic Demographic Items (Docket Number USBC–2020–0031).

Dear Ms. Linse,

LGBT (*Lesbian, Gay, Bisexual, & Transgender*) Tech encourages the continued early adoption and use of cutting-edge, new and emerging technologies by providing information, education and strategic outreach for LGBT communities. PowerOn, a program of LGBT Tech, is a first-of-its-kind program that distributes technology to homeless, isolated, and disadvantaged LGBTQ+ individuals across the country through our network of LGBTQ+ grantee organizations. This grantee network (our PowerOn partner centers) allows us to work at a national scale to distribute life-saving technology at the most impactful grassroots level, empowering individuals with the tools to take charge of their circumstances and tackle the digital divide head-on. Limited available data limits our program's ability to serve this population.

Nearly 4% of the U.S. population (approximately 9 million people) identifies as lesbian, gay, bisexual, or transgender¹. Because of the incredible diversity within the LGBTQ+ community, it is important that the U.S. Census Bureau collect data on sexual orientation and gender identity (SOGI) as part of the Basic Demographics Items to fully understand, and enable accurate representation of, the LGBTQ+ community in governmental and other decisions. The information currently available includes same-sex households, which excludes a large portion of the LGBTQ+ population including those who are bisexual, transgender, and more. Since Current Population Survey data is used widely it is essential that

¹ "How Many People Are Lesbian, Gay, Bisexual, and Transgender?," Williams Institute, February 3, 2021, <https://williamsinstitute.law.ucla.edu/publications/how-many-people-lgbt/>.

this large group of individuals is not excluded from accurate representation because their demographic data is not collected by the CPS.

Jointly sponsored by the U.S. Census Bureau and the U.S. Bureau of Labor Statistics, the CPS is the primary source of labor force statistics for the population of the United States². Using a probability-selected sample of approximately 60,000 occupied households from all 50 states and the District of Columbia, Census Bureau field representatives conduct the survey monthly through both in-person and telephone interviews³. While the CPS collects demographic information about race, sex, Hispanic or Latino ethnicity, and other items⁴, it does not include questions about gender identity and allows only for the identification of same-sex couples, which is a valuable, but incomplete, measure for capturing information on sexual orientation⁵. Numerous members of the LGBTQ+ community are not able to convey their full demographic information and identity because of the lack of these questions. This leaves them underrepresented, or not represented at all, making the efforts of non-profit organizations working to serve them much harder.

An accurate count of individuals with various sexual orientations and gender identities allows us, and other grant-making organizations and social service organizations, to accurately direct funds and services to populations that need them most. Many of our partner LGBTQ+ centers around the country work to serve their LGBTQ+ communities on a local level but may only capture a small snapshot of the population in their area. Those who do not utilize center services, which can be for any number of reasons, from lack of transportation to feeling unsafe being open about their sexual orientation or gender identity in their community, may not be accurately represented in data reported to us by these local groups, which is where census and CPS information can fill in the gaps to give us a complete picture of the population in any given area.

Evidence shows LGBTQ+ people experience disproportionate unemployment rates, wage disparities, discrimination and harassment, overrepresentation in low-income jobs, and underrepresentation in high-wage, high-quality jobs⁶. These problems adversely affect workforce experiences, serve as barriers to workforce entry, and narrow critical pathways to economic advancement for LGBTQ

² U.S. Census Bureau, “Current Population Survey,” available at <https://www.census.gov/programs-surveys/cps.html> (last accessed February 2021).

³ U.S. Census Bureau, “Methodology,” available at <https://www.census.gov/programs-surveys/cps/technical-documentation/methodology.html> (last accessed March 2021)

⁴ U.S. Census Bureau, “Basic CPS Items Booklet Demographic Items,” available at <https://www2.census.gov/programs-surveys/cps/techdocs/questionnaires/Demographics.pdf> (last accessed March 2021); U.S. Bureau of Labor Statistics, “Labor Force Statistics from the Current Population Survey Demographics,” available at <https://www.bls.gov/cps/demographics.htm> (last accessed March 2021).

⁵ National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTQI+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>.

⁶ Movement Advancement Project and National LGBTQ Workers Center, “LGBT People in the Workplace: Demographics, Experiences and Pathways to Equity” (Washington: 2019), available at <https://www.lgbtmap.org/file/LGBT-Workers-3-Page-FINAL.pdf>; Williams Institute, “Documented Evidence of Employment Discrimination and Its Effects on LGBT People” (Los Angeles: University of California Los Angeles School of Law, 2011), available at <https://williamsinstitute.law.ucla.edu/publications/employ-discrim-effect-lgbt-people/>; National Academies of Sciences, Engineering, and Medicine, “Understanding the Wellbeing of LGBTQI+ Populations” (Washington: 2020), available at <https://www.nap.edu/read/25877/chapter/1>.

people, their families, and communities. For LGBTQ people living at the intersection of multiple identities, such as LGBTQ people of color, these challenges are even greater. While there is significant research to support the unique difficulties faced by these groups, the lack of federal data leads to uncertainty regarding the full extent of these hardships, limiting the capacity for meaningful and targeted action. The organizations we work with predominantly serve LGBTQ+ people of color, as well as a wide variety of sexual orientations and gender identities, so increased data collection about this group would inform their local services as well as our nationwide services.

Currently, a wide range of government surveys do not collect information on SOGI and only approximately 1 in 6 LGBTQ+ adults can be identified as LGBTQ from U.S. Census Bureau data⁷. Some surveys, such as the census, now count same-sex couples, but most other major population surveys, including the CPS, do not collect any demographic data about LGBTQ+ people⁸. The information gathered by these data collection tools shapes major policy decisions and allocations of critical resources related to health care, housing, employment, education, and other public benefits, thereby affecting the everyday lives of LGBTQ+ people and making the need for their inclusion even more urgent. If these groups are not counted, policymakers do not know they are there, and policies will not take their unique needs into account.

From the limited data we have, we know there are at least 9 million LGBT Americans; it is a huge disservice to this population, as well as those identifying as queer or questioning (the Q+ part of the acronym), that their sexual orientation and gender identity is not counted in CPS reporting. By adding SOGI data to this demographic collection, service organizations, policymakers, and others trying to serve the LGBTQ+ community can accurately represent and meet the needs of our community.

Sincerely,



Ellie Bessette
Director of Programs
LGBT Technology Institute

⁷ Caroline Medina, Sharita Gruberg, Lindsay Mahowald, and Theo Santos, “Improving the Lives and Rights of LGBTQ People in America” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/lgbtq-rights/reports/2021/01/12/494500/improving-lives-rights-lgbtq-people-america/>.

⁸ Kellan Baker, Laura E. Durso, and Aaron Ridings, “How to Collect Data About LGBT Communities” (Washington: Center for American Progress, 2016), available at <https://www.americanprogress.org/issues/lgbtq-rights/reports/2016/03/15/133223/how-to-collect-data-about-lgbt-communities/>.

Some useful reports for further reading:

- LGBT Technology Institute, “Connect 4 Life,” available at https://43ebe89e-513b-45e1-a618-f488dc0e5e43.filesusr.com/ugd/699ad7_40e710811f30494f96f0282b50c6a7ad.pdf
- LGBT Technology Institute’s PowerOn 2019 Annual Impact Report, available at https://43ebe89e-513b-45e1-a618-f488dc0e5e43.filesusr.com/ugd/699ad7_0d0de383c7534afb960036e287d5d565.pdf
- CenterLink and Movement Advancement Project, “2020 LGBTQ Community Center Survey Report,” (2020), available at <https://www.lgbtcenters.org/Assets/Images/PageContent/Full/lgbtq-centers-report-2020.pdf>
- Movement Advancement Project, “Where We Call Home: LGBT People In Rural America” (2019), available at <https://www.lgbtmap.org/rural-lgbt>