

March 22, 2021

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).

Howard Brown is the largest LGBTQ health center in the Midwest United States, serving over 38,000 patients across 12 clinic locations in Chicago, Illinois. As a federally qualified health center, Howard Brown provides comprehensive, high quality and affordable care—including primary care, behavioral health, mental health services, HIV/STI prevention, elder services and community outreach initiatives—to all of our patients, regardless of ability to pay. Howard Brown’s mission is to eliminate LGBTQ health disparities.

Uniform collection of sexual orientation and gender identity (SOGI) data is a key strategy for reducing and eliminating LGBTQ health disparities. SOGI data, especially from large-scale nationwide surveys, can be used to identify disparities in health outcomes and access to resources. This data is critical for developing and implementing targeted and effective interventions to improve the health and well-being of LGBTQ communities.

As such, we strongly urge the U.S. Census Bureau and the U.S. Bureau of Labor Statistics to add SOGI data collection to the Basic Demographic Items (BDI) on the Current Population Survey (CPS). The CPS is the nation’s primary source of labor force statistics for the entire population of the country. The CPS uses a probability sample of about 60,000 households from all 50 states to collect data on income, employment, poverty, health insurance coverage, and other important socioeconomic factors that have a large impact on health outcomes. The CPS already collects demographic data such as race/ethnicity and sex, but it does not currently collect data on gender identity. While it does allow for identification of same-sex couple households, this is a flawed proxy for individual sexual orientation data.

Policymakers regularly monitor and use CPS statistics to better understand and address disparities in unemployment, poverty, and workforce participation among different communities across the country. We know that these socioeconomic factors have a strong correlation with access to healthcare, and we also know that LGBTQ people experience economic struggles and disparities that contribute to worsened health outcomes. Collecting SOGI data on the CPS will allow policymakers and advocates to better understand LGBTQ

economic disparities across the country, and it will be essential for developing, implementing, and tracking interventions to address these disparities.

Research has shown that LGBTQ people experience unique barriers to economic security, including higher rates of poverty and unemployment, disproportionate vulnerability to homelessness, and widespread workplace discrimination.<sup>1</sup> In fact, one third of LGBTQ Americans have reported that discrimination has moderately or significantly impacted their ability to be hired.<sup>2</sup> The compounding of homophobia, transphobia, racism, and other structural forms of discrimination result in even greater barriers to establishing economic security for LGBTQ people who hold multiple marginalized identities, particularly for transgender people and people of color. These economic disparities have only worsened with the financial downturn from the COVID-19 pandemic. LGBTQ people are more likely to in industries like restaurants and food service, hospitals, schools, and retail compared to cisgender, straight people.<sup>3</sup> These industries have all been highly impacted by the pandemic, so it is unsurprising that additional research has found the LGBTQ people, especially transgender people and people of color, are more likely than the general population to have experienced a cut in work hours or being laid off during the pandemic.<sup>4</sup>

The information gathered by the CPS and other national surveys and data collection tools shapes major policy decisions and allocations of critical resources related to health care, housing, employment, education, and other public benefits. This is critical for addressing health disparities experienced by LGBTQ communities across the nation. Inclusion of SOGI data in the CPS is well aligned with the Biden Administration's strong commitment to advancing health equity, especially through the use of equitable data collection.

Thank you for the opportunity to provide comment. If you have any questions or feedback, please feel free to reach out to Tim Wang, Director of Policy and Advocacy, at [timothyw@howardbrown.org](mailto:timothyw@howardbrown.org).

Sincerely,

David Ernesto Munar, President and CEO

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<sup>1</sup> The National LGBTQ Anti-Poverty Action Network, "Poverty at the End of the Rainbow" (Boston: December 18, 2020), available at <https://nclr.turtl.co/story/poverty-at-the-end-of-the-rainbow/page/2/1>.

<sup>2</sup> Caroline Medina and Lindsay Mahowald, "Lessening the Pandemic's Burden on LGBTQ Workers and Families" (Washington: Center for American Progress, February 11, 2021), available at <https://www.americanprogress.org/issues/lgbtq-rights/news/2021/02/11/495675/lessening-pandemics-burden-lgbtq-workers-families/>.

<sup>3</sup> Human Rights Campaign and PSB Insights. "LGBTQ People and the Coronavirus Economy." Available at: <https://www.hrc.org/resources/lgbtq-people-and-the-coronavirus-economy>

<sup>4</sup> *Ibid.*