

May 15, 2024

TO: Sheleen Dumas  
Department PRA Clearance Officer, Office of the Under Secretary for Economic Affairs,  
Commerce Department.

FROM: Tao Sheng Kwan-Gett, MD, MPH

RE: Comments on The American Community Survey (ACS) Methods Panel: 2024 Sexual  
Orientation and Gender Identity (SOGI) Test

The Washington State Department of Health recommends the American Community Survey (ACS) align with the efforts of the Office of the National Coordinator for Health Information Technology by ensuring that all data follow standards set forth in the US Core for Data Interoperability. In doing so, the data collected from healthcare can more easily be integrated with ACS data for surveillance activities. Fast Healthcare Interoperability Resources (FHIR) Questionnaires and SMART on FHIR Applications should also be explored for alignment with healthcare and minimizing reporting burden.

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

- The proposed collection of SOGI (Sexual Orientation and Gender Identity) data in the American Community Survey (ACS) is beneficial to many of DOH's functions. This data will provide a more comprehensive understanding of demographic trends and ensure better denominator estimates, which are crucial for effective programs, policymaking, and resource allocation. Currently, SOGI data are often obtained through smaller surveys, but integrating it into the ACS would allow for a broader sample size and more robust analysis.
- It's essential to ensure the quality and validity of the collected data. Without accurate information, there is a risk of misrepresenting communities, which could undermine the usefulness of the data for policy and decision-making purposes and further perpetuate stereotypes. Therefore, the proposal to test and validate the SOGI data collection methods before full implementation is prudent. Additionally, validating proxy responses through a second interview via self-reporting demonstrates a commitment to improving data accuracy and reliability.
- Overall, while the collection of SOGI data in the ACS is valuable to modernize our data and promote health equity, attention to data quality and validation processes is essential to

maximize the data's utility and effectiveness. We appreciate the thoughtfulness of this testing process.

**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.**

- No comments

**Evaluate ways to enhance the quality, utility, and clarity of the information to be collected.**

Enhancing the quality, utility, and clarity of the information to be collected in the survey involves several key strategies:

- *Plain Language*: Simplify the language used in the survey questions to make them more understandable to a broader audience. Avoid jargon and technical terms that may be unfamiliar to respondents. Testing the survey with a diverse audience will help identify areas where language can be clarified.
- *Audience Testing*: Conducting this testing with representatives from the target audience will assess comprehension, relevance, and ease of use. Feedback from these tests can inform revisions to improve the survey's effectiveness.
- *Adaptation to Evolving Terms*: Recognize that terminology related to sexual orientation and gender identity is continually evolving. Ensure that survey questions reflect current terminology and understanding within these communities.
- *Translation and Cultural Sensitivity*: Pay attention to the translation of survey questions into Spanish to ensure accuracy and cultural sensitivity. Work with linguists and community representatives to ensure that translations are appropriate and resonate with respondents from diverse linguistic and cultural backgrounds.
- *Compensation for Participation*: Consider compensating respondents for their time, especially for longer surveys like this one. Offering compensation can incentivize participation and reduce attrition rates, leading to higher-quality data.
- *Streamlining and Prioritization*: Review the survey to identify areas where questions could be streamlined or condensed without sacrificing essential information. Prioritize questions based on their relevance to reduce respondent fatigue and increase completion rates.
- *Accessibility*: Ensure that the survey is accessible to all respondents, including those with disabilities. This may involve providing alternative formats, such as audio versions or braille, and ensuring compatibility with screen readers and other assistive technologies.

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

- ACS should explore options to shorten the duration of follow-up interviews without compromising data quality. This could involve optimizing the interview process and
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focusing on essential questions. This approach aligns with best practices of only asking essential questions and prioritizing efficiency and user experience in survey administration.

**Additional comment:**

- In the [Needs and Uses](#) section: “*Data will be assessed by mode of response as well as type of respondent (proxy or self-reported data), in addition to **other subgroups of interest**.*” It would be helpful to define and elaborate on “other subgroups of interest”.

Thank you for the opportunity to review and comment on this important topic.

Best,

A handwritten signature in blue ink, appearing to read 'Tao Sheng Kwan-Gett MD MPH'.

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Chief Science Officer  
Office of Health and Science