UCLA School of Law Williams Institute

RESEARCH THAT MATTERS

REMOVAL OF SEXUAL ORIENTATION AND GENDER IDENTITY FROM FEDERAL DATA COLLECTIONS

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EXECUTIVE SUMMARY

Data on sexual orientation and gender identity (SOGI) are essential for understanding the characteristics of lesbian, gay, bisexual, and transgender (LGBT) populations in the United States. However, on the first day of his second term, President Donald Trump issued an executive order that declared it was official policy of the administration that transgender, nonbinary, and intersex identities would not be recognized by the federal government. In response, federal agencies began removing gender identity questions, along with several other data elements related to LGBT communities, from a broad range of federal data collections.

Using primarily government sources, we identified the removal of at least one SOGI measure from approximately 360 different federal data collections. We consider this a conservative estimate and expect upward revisions as ongoing data reconciliation and discovery of additional removals continue. Additionally, we found:

- The majority (94%) of data elements removed from federal collections were gender identity demographic measures (n=338 collections). These changes were made largely pursuant to President Trump's Executive Order 14,168.
- At least 60 data collections also removed sexual orientation data elements. These actions were not explicitly mandated under Executive Order 14,168 or related implementation guidance.
- Twenty-three (23) collections removed SO and/or GI data elements from bias motivation questions, precluding the ability to report discrimination on these bases.
- Eighty-three percent (83%) of removals were made through non-substantive change requests made to the Office of Management and Budget (n=300). Very few collections were changed through the formal notice-and-comment process (n=34).
- These removals span multiple data collection types, including national surveys and surveillance systems, government-funded research studies, programmatic monitoring systems and evaluation studies, and administrative forms and records.

INTRODUCTION

Data on sexual orientation and gender identity (SOGI) are essential for understanding the characteristics of lesbian, gay, bisexual, and transgender (LGBT) populations in the United States, assessing and addressing their needs, allocating public and private resources, and developing impactful policy at the local, state, and federal levels.[1] There is a long history of evidence building and methodological research supporting the collection of SOGI data at the federal level.[2] Under the Biden administration, the practice was widely adopted.[3]

On the first day of his second term, President Donald Trump issued an executive order that declared it was official policy of the administration that transgender, nonbinary, and intersex identities would not be recognized by the federal government.[4] In response, the Office of Management and Budget (OMB) issued guidance directing all federal agencies to conform their policies and programs to the executive order.[5] One effect of this directive was the systematic removal of gender identity measures, and in numerous cases, sexual orientation measures as well, from federal surveys, datasets, reports, and public websites.[6]

This report documents the removal of SOGI measures that have occurred since the start of the second Trump administration, specifically from late January 2025, when Executive Order 14,168 was announced, through late January 2026, the one-year anniversary of that announcement.

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[1] Mallory, C., Vasquez, L.A., Redfield, E., & Conron, K.J. (2022). *Office of Science and Technology Policy: Public Comment*. https://williamsinstitute.law.ucla.edu/publications/ostp-comment/; Movement Advancement Project (MAP). (2023). *Why the American Community Survey matters for LGBTQI+ people.* https://www.mapresearch.org/file/Fact-Sheet-Why-the-Census-Matters.pdf

[2] Meyer, I. H., & Bouton, L. J. (2025). *Impact of executive orders on access to federal data*. Los Angeles, CA: The Williams Institute at UCLA School of Law. https://williamsinstitute.law.ucla.edu/wp-content/uploads/SOGI-Data-Removal-EO-Feb-2025.pdf ; National Academies of Sciences, Engineering, and Medicine. (2022). *Measuring sex, gender identity, and sexual orientation* (p. 45). https://nap.nationalacademies.org/catalog/26424/measuring-sex-gender-identity-and-sexual-orientation.

[3] *Executive Order on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals,* Exec. Order No. 14075, 87 Fed. Reg. 37,189 (2022). https://www.federalregister.gov/documents/2022/06/21/2022-13391/advancing-equality-for-lesbian-gay-bisexual-transgender-queer-and-intersex-individuals; National Science and Technology Council. (2023). *Federal evidence agenda on LGBTQI+ equity*. Office of Science and Technology Policy. https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/01/Federal-Evidence-Agenda-on-LGBTQI-Equity.pdf; Shanker, A., & Korniejczuk, M. (2024). Collecting data on sexual orientation and gender identity: A promising practice for improving population health and advancing health equity. *Public Health Reports, 30*. https://doi.org/10.1177/00333549241308401 .

[4] *Defending women from gender ideology extremism and restoring biological truth to the federal government*, Exec. Order No. 14,168, *90* Fed. Reg. 8,615 (2025).https://www.federalregister.gov/documents/2025/01/30/2025-02090/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal ; E. Redfield & I. Chokshi (2025). *Impact of the executive order redefining sex on transgender, nonbinary, and intersex people.* Los Angeles, CA: The Williams Institute at UCLA School of Law. https://williamsinstitute.law.ucla.edu/publications/impact-eo-redefine-sex-tbi/.

[5] Sec. 7. "Agency Implementation and Reporting. (a) Within 120 days of the date of this order, each agency head shall submit an update on implementation of this order to the President, through the Director of the Office of Management and Budget. That update shall address: (i) changes to agency documents, including regulations, guidance, forms, and communications, made to comply with this order; and (ii) agency-imposed requirements on federally funded entities, including contractors, to achieve the policy of this order." Mancini, D. (2025, February 11). *Memorandum for the heads of executive departments and agencies and independent regulatory agencies: Guidance on implementing section 3(e) of Executive Order 14168 in accordance with the Paperwork Reduction Act and the Privacy Act*. Office of Information and Regulatory Affairs, Office of Management and Budget. (Document not publicly available among OMB memos; found among ICR supporting documentation on Reginfo) https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202507-1601-002.

[6] Wang, H. L. (2025, February 21). Census Bureau stopped work on data for protecting trans rights, former director says. *National Public Radio*. https://www.npr.org/2025/02/21/nx-s1-5305265/census-lgbtq-sogi-data-robert-santos; See footnote 2 (Meyer & Bouton, 2025).

FINDINGS

REMOVAL OVERALL

Since January 20, 2025, approximately 360 federal data collections have removed a sexual orientation or gender identity measure. Most removals were from evaluation research and programmatic monitoring collections, with at least 100 collections each eliminating a sexual orientation or gender identity measure, followed by 78 administrative collections. Among major national and population-based collections, 63 removed a sexual orientation or gender identity measure. This includes 36 national surveys, three of which are government-funded private studies, and 27 surveillance systems (Table 1). See Appendix for a full list of collections where removals were identified.

Table 1. Count of federal data collections with SOGI measure removals overall, by collection type

FEDERAL DATA COLLECTIONS CONTAINING SOGI MEASURES	TOTAL COLLECTIONS	NATIONAL SURVEYS	POPULATION SURVEILLANCE	EVALUATION RESEARCH	PROGRAM MONITORING	ADMINISTRATIVE
Total data collections with SOGI removals	**360**	**36**	**27**	**118**	**101**	**78**
Confirmed removal	344	30	24	113	100	77
Presumptive removal*	16	6	3	5	1	1

Note: Total = Confirmed + Presumptive removals; *Data collections without official documentation confirming removal of SOGI measures, but where removal is evident through other modifications, such as changes in public-facing published results.

REMOVAL OF DEMOGRAPHIC MEASURES

Gender identity was the primary category of removed questions from federal data collections during the evaluation period. Of the 360 removals, 338 included gender identity. Overall, the majority of gender identity removals were one-step questions, though it varied by collection type. For instance, national surveys and evaluation research had implemented and ultimately removed more two-step than one-step gender identity questions, whereas programmatic monitoring and administrative collections mainly included and ultimately removed one-step gender identity questions. Approximately 15 collections that included "intersex" as a response option removed it (Table 2).

Among private studies that receive grant funding from the federal government, three have removed gender identity questions or published results on gender identity/transgender people. These include the General Social Survey (GSS), Population Assessment of Tobacco and Health Study (PATH), and Monitoring the Future (MTF).[7]

[7] NORC at the University of Chicago. (2025). *General Social Survey (GSS): 2024 Codebook.* https://gss.norc.org/content/dam/gss/get-documentation/pdf/codebook/GSS%202024%20Codebook%20R2.pdf , National Institutes of Health (NIH) & Westat. (2025). *Population Assessment of Tobacco and Health Study (PATH): 2025 Questionnaire.* https://www.icpsr.umich.edu/files/NAHDAP/pathstudy/PATH-W85-Adult-English-DCI-20250606.pdf; University of Michigan Institute for Social Research. (2025). *Monitoring the Future (MTF): 2024 Annual Report.* https://monitoringthefuture.org/wp-content/

Table 2. Count of federal data collections with gender identity demographic measure removals, by collection type

REMOVAL OF DEMOGRAPHIC MEASURES	TOTAL COLLECTIONS	NATIONAL SURVEYS	POPULATION SURVEILLANCE	EVALUATION RESEARCH	PROGRAM MONITORING	ADMINISTRATIVE
Gender identity	**338**	**33**	**26**	**111**	**99**	**69**
1 step	194	14	14	19	87	60
2 step	144	19	12	92	12	9
Intersex response option*	**15**	**1**	**4**	**2**	**5**	**3**

Note: *The majority of these collections included "intersex" as a response option when asking about sex assigned at birth.

Overall, 62 collections removed a sexual orientation measure, including sexual orientation as a demographic measure and as a motivation for bias: 50 removed a demographic sexual orientation measure, and an additional 12, which did not ask a demographic sexual orientation measure, removed sexual orientation as a reason for a bias-motivated incident (Tables 3 and 4). Among the 50 data collections that removed a demographic sexual orientation measure, seven were national surveys (Table 3). Specifically, these surveys were the American Survey of Mortgage Borrowers (ASMB), Survey of Earned Doctorates (SED), American Community Survey (ACS) Panel Test, Annual Business Survey (ABS), National Survey on Drug Use and Health (NSDUH), Health Center Patient Survey (HCPS), and the National Youth Tobacco Survey (NYTS).[8]

An additional seven collections removed a combined SOGI measure, such as a question asking, "Do you identify as a member of the LGBTQ community?" None of the collections that asked about same-sex partnership status removed those questions (Table 3).

uploads/2024/07/mtfpanel2024.pdf (Version published in 2025) & https://web.archive.org/web/20250105092340/https://monitoringthefuture.org/wp-content/uploads/2024/07/mtfpanel2024.pdf (Version published in 2024).

[8] Federal Housing Finance Agency (FHFA). (2025, Feb 27) *American Survey of Mortgage Borrowers (ASMB): Non-substantive change request* (Mentions removal of gender identity but not sexual orientation). https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202502-2590-001. FHFA. (2024). ASMB: Survey prior to NSCR showing SOGI. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202406-2590-001&icID=220715; FHFA. (2025). ASMB: Survey modified as part of NSCR showing removal of gender identity and sexual orientation.https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202502-2590-001&icID=220715 ; National Center for Science and Engineering Statistics (NCSES). (2025, March 31). *Survey of Earned Doctorates (SED): Non-substantive change request.* National Science Foundation. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202503-3145-003; U.S. Census Bureau.(2025, April 17). *American Community Survey (ACS) Panel Test: Non-substantive change request.* U.S. Department of Commerce.https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202503-0607-001; U.S. Census Bureau. (2025, March 31). *Annual Business Survey (ABS): Federal Register Notice.* U.S. Department of Commerce. https://www.federalregister.gov/documents/2025/03/31/2025-05463/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for; Substance Abuse and Mental Health Services Administration (SAMHSA). (2025, Sept 29). *National Survey on Drug Use and Health (NSDUH): Non-substantive change request.* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202509-0930-012; Centers for Disease Control and Prevention (CDC). (2025, Oct 29). *National Youth Tobacco Survey (NYTS): Non-substantive change request.* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202510-0910-002; Health Resources and Services Administration (HRSA). (n.d.). *Health Center Patient Survey (HCPS): 2022 Questionnaire.* U.S. Department of Health and Human Services. https://data.hrsa.gov/Content/Documents/tools/hcps/HCPSQuestionnairePublicUse.pdf (Unmodified version available on the Wayback Machine). https://web.archive.org/web/20250103194304/https://data.hrsa.gov/Content/Documents/tools/hcps/HCPSQuestionnairePublicUse.pdf

Table 3. Count of federal data collections with sexual orientation demographic measure removals, by collection type

REMOVAL OF DEMOGRAPHIC MEASURES	TOTAL COLLECTIONS	NATIONAL SURVEYS	POPULATION SURVEILLANCE	EVALUATION RESEARCH	PROGRAM MONITORING	ADMINISTRATIVE
Sexual orientation	50	7*	5	14	17	7
Same-sex partnership	0	0	0	0	n/a	0
Combined SOGI measure	7	n/a	n/a	1	4	2

Notes: * Includes one collection which kept a sexual orientation question but modified the response options from: "Straight or heterosexual, Gay or lesbian, Bisexual, pansexual, or queer, Asexual, I am not sure or I am questioning, I do not know what this question means, Something else not included here [Specify].", to: "Straight or heterosexual, Not heterosexual." See footnote 8 (CDC: NYTS, 2025); Combined SOGI measure = measures which combine sexual and gender minority status into one group, such as LGBTQ.

REMOVAL OF REASONS FOR BIAS-MOTIVATED INCIDENTS

Among the 23 collections that removed the opportunity for respondents to attribute incidences of bias to their sexual orientation or gender identity, 22 removed gender identity and 15 removed sexual orientation as a response option (Table 4). There were a few instances in which gender identity was proposed for removal in a bias-motivated incident question, but the agency ultimately reinstated the question or response option. These revisions were attributed to statutory requirements. For example, we documented two proposed removals related to discrimination protections that were modified before becoming final: a non-substantive change request (NSCR) initially directed the removal of SOGI as bias motivations in the National Crime Victimization Survey (NCVS) and the Equal Employment Opportunity (EEO) Complaint Form; however, subsequent documentation rescinded that guidance.[9] We did not count these as "removals" in this analysis.

[9] The statutory requirement this is referencing is Title VII of the Civil Rights Act, which prohibits sex discrimination in employment. Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e - 2000e17 (as amended). In Bostock v. Clayton Cty., 590 U.S> 644 (2020), the Supreme Court ruled that Title VII's protections extend to discrimination on the basis of sexual orientation and gender identity.; A March 3, 2025 NSCR stated, "BJS also requested the removal of a question which asks: *Do you think the offender was targeting you {or someone you live with} because of prejudice or bigotry toward your gender identity, including being transgender, intersex, or gender non-conforming?...*The Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act of 2009 uses the term "gender" and "gender identity" as an actual or perceived characteristic that can be the basis for a hate crime. Given this federal law, the removal of this question is being reviewed by Office of General Council representatives at BJS, Census Bureau, and OMB. Until final guidance is provided, this question has been programmed by Census to be skipped." Morgan, R.E. (2025, March 3). *Memorandum: Non-substantive change request for the National Crime Victimization Survey (OMB Control No. 1121-0111).* https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202503-1121-001; Two months later, a new NSCR submitted on May 5, 2025 stated: The Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act of 2009 uses the term "gender" and "gender identity" as an actual or perceived characteristic that can be the basis for a hate crime. The Census Bureau collects NCVS data on hate crimes to fulfill BJS's statutory requirement to report on Hate Crime Statistics under 34 U.S.C. 41305. Collecting these data is not in conflict with Executive Order 14168 titled "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government." Morgan, R.E. (2025, May 5). *Memorandum: Non-substantive change request for the National Crime Victimization Survey (OMB Control No. 1121-0111).* https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202504-1121-001; " The removal of subcategories under "sex" specifying gender orientation and sexual orientation is being done in accordance with Executive Order 14168, "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government" (Jan 20, 2025). Nonetheless, Treasury recognizes that *Bostock* prohibits discrimination based on sexual orientation and gender identity and confirms that employees can continue to file claims on those bases by indicating they have been discriminated against based on their sex." U.S. Department of Treasury. (2025, September 30). *Supporting Statement – Information Collection Request.* https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202504-1505-001&icID=230736

Table 4. Count of federal data collections with SOGI removals from bias-motivated incident measures, by collection type

BIAS-MOTIVATED INCIDENT MEASURES	TOTAL COLLECTIONS	NATIONAL SURVEYS	POPULATION SURVEILLANCE	EVALUATION RESEARCH	PROGRAM MONITORING	ADMINISTRATIVE
Total collections	**23**	**4**	**3**	**6**	**1**	**9**
Sexual orientation	15	3	1	5	1	5
Gender identity	22	4	3	6	1	8

REMOVAL MECHANISMS

The majority of removals were enacted through non-substantive change requests (NSCRs; see Methods for detailed description). This made up approximately 83% of all documented removals. In addition, 10 collections containing SOGI measures were discontinued in 2025 (Table 5).[10]

Table 5. Federal SOGI data removal mechanisms

REMOVAL MECHANISM	N = 370
Non-substantive change request (NSCR)	300
Federal Register Notice (FRN)	34
Other	26
Collection discontinued*	10

Note: FRN = includes "FRN presumptives"; Other = Removal was evident in other documentation, such as Reginfo or public-facing questionnaires, or in "presumptive" data collections, which, for example, excluded SOGI data in published results on public-facing websites. *Data collection, which contained SOGI measures and was discontinued after January 30th, 2025.

[10] Department of Justice (DOJ). (2025, March 4). *Police-Public Contact Survey (PPCS) [NCVS supplement]: OMB control number 1121-0260 history.* https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=1121-0260; Health and Human Services (HHS). (2026, Jan 30). *National Health Interview Survey TEEN (Adolescent Follow Back Survey): NHIS Non-substantive Change Request 2026.* https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202601-0920-011; Health and Human Services (HHS). (2025, Feb 25*). HIV Outpatient Study (HOPS): OMB control number 0920-1080 history*. https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0920-1080; Health and Human Services (HHS). (2025, Feb 21*). Barriers and Facilitators to Expanding the NHBS to Transgender Women (NHBS-Trans) [National HIV Behavioral Surveillance]: OMB control number 0920-1262 history*. https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0920-1262 ; Department of Homeland Security (DOH). (2025, June 24). *FEMA Form FF-256-FY-21-100: Equity Demographic Questions: OMB control number 1660-0154 history.* https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=1660-0154; Health and Human Services (HHS). (2025, August 4*). Project SHIELD (Surveillance of HIV-Related Service Barriers Among Individuals with Early or Late HIV Diagnoses): OMB control number 0920-1402 history*. https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0920-1402; U.S. Department of Agriculture (USDA). (2025, April 4). *Understanding the Relationship Between Poverty, Well-Being, and Food Security: OMB control number 0584-0682 history*. https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0584-0682 ; Health and Human Services (HHS). (2025, March 10). *Nurse Fatigue-Mitigation Education: Does it Change Nurse Sleep Behavior?: Non-substantive change request.* https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202502-0920-007 ; Department of Defense. (DOD). (2025, March 10). *Sexual Assault Prevention and Response (SAPR) / Sexual Harassment/Assault Response and Prevention Survey (SHARP): OMB control number 0704-0608 history.* https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0704-0608; Department of Defense. (DOD). (2025, May 29). Armed Forces Workplace Equal Opportunity Survey (WEOS). https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0704-0631

METHODS

To systematically document and track the removal of sexual orientation and gender identity measures, we developed a database of federal data collections where SOGI-related measures had been added, or where such measures were proposed or tested. Evidence of the removal of these measures was identified through publicly available resources, primarily through RegInfo.gov, where, under the Paperwork Reduction Act (PRA), federal agencies are legally mandated to publicly document and obtain approval before collecting information from the public, including when making changes to previously approved collections.[11] Supplemental evidence was gathered via public-facing agency websites, publicly available survey documentation, and news reports. In addition to our independent analysis, we relied on evidence of removals associated with the executive order reported by Dataindex.us.[12]

For each data collection instrument that underwent removals of SOGI measures, we documented the regulatory context, collection type, pre-2025 SOGI measures, post-EO SOGI measures, and the mechanism by which SOGI measures were removed. Where possible, we verified each modification using official agency documentation and reviewed the affected questionnaires directly, comparing versions before and after the executive order. A removal is considered "confirmed" if there is direct evidence of questionnaire modification, whether in Reginfo or in the public domain. Otherwise, it is categorized as presumptive or inconclusive.

In addition, many studies and programs use more than one survey instrument, and it is common for multiple collections to fall under a single OMB control number. As a guiding principle, we counted groups of instruments as one collection when there was no substantive difference between them; for example, a baseline and a follow-up survey, or an intake form and a feedback form, were counted as a single collection under that study or program. However, when a collection includes separate instruments for distinct populations (such as youth and adults) or includes a supplemental survey on a different topic, we treated these as separate collections and counted them individually.

REGULATORY CONTEXT AND COLLECTION TYPE

To help clarify the legal and policy frameworks guiding each data collection, we verified the agency or agencies responsible for them, the authorizing statute, if applicable, and whether SOGI data collection was explicitly mandated under a specific provision of law.[13] Additionally, data collections were categorized to reflect their primary purpose, scope, and use. They were sorted into one of the following categories:

- **National survey**. Ongoing, nationally representative household or individual surveys that produce publicly reported statistics and widely used research data, such as the American Housing Survey (AHS), a longitudinal probability survey conducted since 1973, designed to track housing

[11] "The PRA was designed, among other things, to "ensure the greatest possible public benefit from and maximize the utility of information created, collected, maintained, used, shared and disseminated by or for the Federal Government" and to "improve the quality and use of Federal information to strengthen decision making, accountability, and openness in Government and society." 44 U.S.C. § 3501." U.S. Congress. (1995). *Paperwork Reduction Act of 1995* (Pub. L. No. 104-13).;Digital.gov (n.a.). A guide to the Paperwork Reduction Act. https://pra.digital.gov/; U.S. General Services Administration. (n.d.). *Frequently asked questions (FAQ)*. RegInfo.gov. https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp

[12] Dataindex.us. (2025). *Change requests: Presidential action driven*. https://dataindex.us/icr

[13] For analysis by agency see Klein. M. (2025). *100s of Information Collections Influenced by Presidential Actions in the First 6 Months of the Trump Administration. Dataindex.* https://dataindex.us/newsletter/article/4a21cae3-cfcb-4e53-b174-097c9dda5dec

and households over time.[14] This category also includes federally funded but independently administered studies, such as the General Social Survey, a nationally representative survey funded by the National Science Foundation and conducted since 1972 to monitor attitudes and behaviors of the American public over time.[15]

- **Population surveillance**. Ongoing, population-based surveillance systems and administrative datasets that provide foundational data for establishing national baselines and monitoring system-level trends. For example, the Homeless Management Information System (HMIS), which maintains administrative data on demographics, service use, and program outcomes among people experiencing housing insecurity.[16]
- **Evaluation research**. Targeted (one-time or ongoing) data collections designed to assess the effectiveness, impact, or outcomes of specific federal programs, interventions, or initiatives such as the Essentials for Childhood: Preventing Adverse Childhood Experiences (ACEs) through Data to Action Program, launched in 2023 in partnership with state and local health entities to reduce ACEs, including by enhancing data collection and refining interventions.[17] This category also includes research and development collections, which are routinely used to test and refine survey instruments, such as the Research and Development Survey (RANDS).[18]
- **Programmatic monitoring**. Routine data collection used to track service delivery, grantee performance, and participant experiences for operational oversight and program management, such as the Ryan White HIV/AIDS Program (RWHAP), which, since 1990, has funded government and community organizations nationwide to provide direct medical care and supportive services to low-income individuals diagnosed with HIV, effectively slowing the HIV epidemic in the U.S.[19]
- **Administrative**. Forms and records where information is collected primarily for operational purposes, such as the G-325A, Biographic Information (for Deferred Action) application form, which is used by undocumented immigrants in the U.S. to request temporary postponement of deportation proceedings, including humanitarian or family-related circumstances.[20] We also included administrative databases such as the US Core Data for Interoperability (USCDI) in this category.[21]

[14] U.S. Census Bureau & Department of Housing and Urban Development (HUD). (n.d.) *American Housing Survey (AHS).* https://www.census.gov/programs-surveys/ahs.html

[15] National Opinion Research Center (NORC) at the University of Chicago. (n.d.) *General Social Survey (GSS)*. https://gss.norc.org/about-the-gss.html

[16] Department of Housing and Urban Development (HUD). (n.d.). *Homeless Management Information System (HMIS): Homelessness data*. https://www.hudexchange.info/homelessness-assistance/data/

[17] Centers for Disease Control and Prevention (CDC). (n.d.). *Essentials for Childhood: Preventing adverse childhood experiences through data to action*. U.S. Department of Health and Human Services. https://www.cdc.gov/aces/programs/index.html

[18] Centers for Disease Control and Prevention (CDC). (n.d.) *Research and Development Survey (RANDS).* U.S. Department of Health and Human Services. https://www.cdc.gov/nchs/rands/index.html

[19] Health Resources and Services Administration (HRSA). (n.d.). *Ryan White HIV/AIDS program*. U.S. Department of Health and Human Services. https://ryanwhite.hrsa.gov/

[20] U.S. Citizenship and Immigration Services USCIS). (n.d.). *G-325A, Biographic Information (for Deferred Action)*. U.S. DOH. https://www.uscis.gov/g-325a

[21] Office of the National Coordinator for Health Information Technology. (n.d.). *United States Core Data for Interoperability (USCDI).* Interoperability Standards Platform. https://isp.healthit.gov/united-states-core-data-interoperability-uscdi

MEASURES TRACKED

We documented measures of sexual orientation and gender identity (SOGI) that were included in federal data collections prior to January 2025. We also documented data collections that had proposed, planned, or tested SOGI measures, even when such measures had not yet been implemented.

Sexual Orientation

We documented any questions that assessed sexual orientation, same-sex partnership status, sexual and gender minority identity as single, combined measures such as "identification with the LGBT community," and data collections that assess SOGI indirectly by asking the programs or organizations they work with or manage whether SOGI data are collected. For example:

- Many data collections, such as the HHS's Domestic Victims of Human Trafficking (DVHT) program, included *sexual orientation* as a standard data element in their client characteristics. Response options in DVHT included: [22]
  - Straight or heterosexual
  - Gay
  - Lesbian
  - Bisexual
  - Client uses a different term (specify)
- Data collections, such as the Decennial Census, Current Population Survey (CPS), and Survey of Income and Program Participation (SIPP), assess self-reported *same-sex partnership status,* allowing respondents to more accurately describe their relationships to members of their household. Since 2014, the SIPP asks, "How are you related to (reference person's name)?" Response options include: [23]
  - Opposite sex husband/wife/spouse
  - Opposite sex unmarried partner
  - Same-sex husband/wife/spouse, or
  - Same-sex unmarried partner
- Some data collections asked about *sexual and gender minority identity* as a single, combined measure, such as the DOL's Workforce Recruitment Program (WRP), which asked: "Do you identify as LGBTQIA+?" Response options included: Yes, No, I am not sure.[24]

[22] Administration for Children and Families (ACF). *2024 Client Characteristics and Program Entry Form.* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202310-0970-012&icID=239400

[23] U.S. Census Bureau. (2025). *2024 SIPP data dictionary*. https://www2.census.gov/programs-surveys/sipp/tech-documentation/data-dictionaries/2024/2024_SIPP_Data_Dictionary.pdf

[24] Office of Disability Employment Policy (ODEP). *Workforce Recruitment Program: Student registration form.* U.S. Department of Labor. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202304-1230-001&icID=248203

Gender Identity

We documented measures of gender identity and categorized them into two groups: data collections that assessed gender identity using one question (one-step method) and those that assessed gender identity using two questions: sex at birth and gender (two-step method).

Gender Identity One-Step Method

In the one-step method, gender is asked through a single question that allows self-identification beyond male and female, such as including transgender and/or nonbinary as response options.[25] For example:

The National Health Interview Survey has asked about sexual orientation since 2013; in 2023, they began asking about gender identity: "For this next question, you may select more than one answer. Do you currently describe yourself as male, female, transgender, nonbinary, or another gender?"[26]

- Since 2022, the U.S. passport application form has allowed selection for gender markers "M" (male), "F" (female), and "X" (unspecified or another gender identity).[27]

Some data collections include a single transgender identity item in their questionnaires. For example:

- Since 2014, the Behavioral Risk Factor Surveillance System (BRFSS) asked, "Do you consider yourself to be transgender?"[28]
  - Yes, Transgender, male-to-female
  - Yes, Transgender, female-to-male
  - Yes, Transgender, gender nonconforming
  - No
  - Don't know/not sure
- Since 2013, the National Violent Death Reporting System (NVDRS) has included a checkbox labeled "transgender" if "victim self-identifies as transgender or a friend/family member report that the victim self-identified as transgender."[29]

[25] Exclusive of response options such as, for example, "refused," "unknown," or "don't know".

[26] National Center for Health Statistics (NCHS). (2024). *National Health Interview Survey (NHIS) Questionnaire.* U.S. Department of Health and Human Services. https://ftp.cdc.gov/pub/Health_Statistics/NCHS/Survey_Questionnaires/NHIS/2024/EnglishQuest.pdf

[27] U.S. Department of State. (2022). *X gender marker available on U.S. passports starting April 11.* https://2021-2025.state.gov/x-gender-marker-available-on-u-s-passports-starting-april-11/

[28] Centers for Disease Control and Prevention (CDC). (2023*). 2023 BRFSS Questionnaire.* U.S. Department of Health and Human Services. https://www.cdc.gov/brfss/questionnaires/pdf-ques/2023-BRFSS-Questionnaire-508.pdf; Centers for Medicare & Medicaid Services. (n.d.). *Behavioral Risk Factor Surveillance System (BRFSS).* CMS Office of Minority Health, Sexual and Gender Minority Clearinghouse. https://www.cms.gov/about-cms/agency-information/omh/resource-center/hcps-and-researchers/data-tools/sgm-clearinghouse/brfss

[29] Centers for Disease Control and Prevention (CDC). (2022). *National Violent Death Reporting System web coding manual version 6.0*.* U.S. Department of Health and Human Services. https://web.archive.org/web/20240502181744/https://www.cdc.gov/violenceprevention/pdf/nvdrs/nvdrsCodingManual. pdf; Clark, K. A., & Blosnich, J. R. (2024). Limitations of sexual orientation and gender identity information as reported in the National Violent Death Reporting System. *LGBT Health*, *11*(3), 173–177. https://doi.org/10.1089/lgbt.2022.0297

Gender Identity Two-Step

In the two-step method for measuring gender identity, "sex" and "gender" are asked as two separate questions, usually by first asking for respondents' sex at birth, followed by a question about their current gender identity. This method, first introduced in 1997, has been tested over the course of two decades, and a 2022 consensus report produced by the National Academies of Sciences, Engineering, and Medicine (NASEM) used the evidence base for the two-step method to recommend its further adoption.[30] Examples of data collection instruments using the two-step method include:

In the two-step method for measuring gender identity, "sex" and "gender" are asked as two separate questions, usually by first asking for respondents' sex at birth, followed by a question about their current gender identity.

- The National Inmate Survey (NIS) began asking about gender identity in 2007, with the two-step question implemented in 2023 to ask: "What sex were you assigned at birth on your original birth certificate?" "Male," or "Female." This was followed by "Do you currently think of yourself as…?" With response options:[31]
  - Male
  - Female
  - Transgender
  - None of these
- The Department of Defense's Gender Relations Surveys asked, "What sex were you assigned at birth, on your original birth certificate? *Mark one*." "Male," or "Female." Followed by, "Do you currently describe yourself as male, female, or transgender? *Mark one.*"[32]

We also documented several data collections with measures that included "intersex" as a response option, primarily for the question on "assigned sex at birth", and at least two that included it as a response option for "gender identity."[33]

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[30] Badgett, M. V. L., Goldberg, N., Conron, K. J., & Gates, G. J. (2009). *Best practices for asking questions about sexual orientation on surveys (SMART)*. Los Angeles, CA: The Williams Institute at UCLA School of Law. https://williamsinstitute.law.ucla.edu/publications/smart-so-survey; Baker, K. E., Conron, K. J., Gates, G. J., Gill, A., Greytak, E., & Herman, J. L. (2014). *Best practices for asking questions to identify transgender and other gender minority respondents on population-based surveys (GenIUSS)*. Los Angeles, CA: The Williams Institute, UCLA School of Law. https://williamsinstitute.law.ucla.edu/publications/geniuss-trans-pop-based-survey/; National Academies of Sciences, Engineering, and Medicine (NASEM). (2022). *Measuring sex, gender identity, and sexual orientation*. National Academies Press. https://www.nationalacademies.org/publications/26424

[31] Bureau of Justice Statistics (BJS). (2024). *National Inmate Survey.* U.S. Department of Justice. https://bjs.ojp.gov/document/nis-4p_papi_males.pdf; Congressional Research Service (CRS). (2024). *Proposed expanded collection of statistics on sexual orientation and gender identity by the federal government (IN12342).* U.S. Congress. https://www.congress.gov/crs_external_products/IN/HTML/IN12342.web.html

[32] Department of Defense (DOD). (2022). *2022 Service Academy Gender Relations Survey.* https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202106-0704-003&icID=247855; DOD. (2024). *Workplace and Gender Relations Survey of Military Members*. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202404-0704-007&icID=246749; DOD. (2024). *2023 Department of Defense Civilian Employee Workplace and Gender Relations Survey*. (Reginfo version withdrawn; version available at omb.report) https://omb.report/icr/202409-0704-004/doc/146247400

[33] For example, the National HIV Behavioral Surveillance (NHBS) included the following options: Male, Female, Intersex/ambiguous, and the gender identity question in the Survey on Sexual Victimization (SSV) included: Male; Female; Transgender (a person whose gender identity is different from the person's sex assigned at birth); Intersex (a person whose sexual or reproductive anatomy or chromosomal pattern does not fit typical definitions of male or female; sometimes referred to as differences in sex development); Gender nonconforming (a person whose gender identity does not conform to traditional societal gender expectations); Other—Specify _____." Centers for Disease Control and Prevention (CDC). (2023). *National HIV Behavioral Surveillance (NHBS): Screener.* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAICList?ref_nbr=202208-0920-004

Bias-Motivated Incidents

In addition to demographic SOGI questions, questions assessing reasons for incidents of bias, such as discrimination experiences and hate crimes, where sexual orientation and gender identity were included as reasons, were also tracked. For example:

- The Medicare Current Beneficiary Survey (MCBS) asked "...did anyone from a clinic, emergency room, or doctor's office where you got care treat you in an unfair or insensitive way because of any of the following things about you..." Response options included: [34]
  - Gender or gender identity?
  - Sexual orientation?
- The Sudden Death in the Young Registry (SDY) asks those completing a case report to "[p]lease indicate all stressors that were present for this child around the time of death."[35]
  - Stress due to gender identity (The child experienced stress due to coming out or to the responses of others related to their gender identity).
  - Stress due to sexual orientation (The child experienced stress due to coming out or to the responses of others related to their sexual orientation).

HOW MEASURES WERE REMOVED IN RESPONSE TO EXECUTIVE ORDER

We considered a "removal" to be an instance where a SOGI measure had been included in an existing data collection or had been proposed or tested for inclusion in an upcoming iteration and was subsequently deleted from the data collection or proposed data collection, or for which plans to test or implement the measure were withdrawn. Almost without exception, when sexual orientation measures were removed, they were removed without replacement. Removal of a one-step gender identity question typically resulted in replacement with a simplified "sex" question with binary response options (male or female). Removal of a two-step gender identity question typically resulted in the deletion of the "gender identity" component of the two-step and retention of the "sex" component (removing any answer options outside of male and female, including intersex).[36] For example:

- The sexual orientation measure in the Runaway and Homeless Youth Homeless Management Information System (RHY – HMIS), which had previously been a required data element, was

; Office of Justice Programs (OJP). (2024). *Survey on Sexual Victimization. Questionnaire.* U.S. Department of Justice. https://www.reginfo.gov/public/do/PRAICList?ref_nbr=202405-1121-001

[34] Centers for Medicare & Medicaid Services (CMS). (2023). *Medicare Current Beneficiary Survey (MCBS). 2023 Satisfaction with Care Questionnaire).* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202407-0938-007&icID=8171

[35] Administration for Children and Families (ACF). (2022). *Sudden Death in the Young Registry Case Reporting System.* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202201-0920-011&icID=217617; Center for Fatality Review and Prevention. (n.d.). *National Fatality Review Case Reporting System Data Dictionary V6.0.* https://ncfrp.org/wp-content/uploads/DataDictionary_CRS_v6-0.pdf

[36] "Consistent with the E.O., the Department follows the expanded sex-based definitions issued by the Department of Health and Human Services (HHS), which recognizes that there are only two sexes, male and female, as characterized by the individual's reproductive system, and that rare disorders of sexual development do not constitute a third sex. The Office of Personnel Management (OPM) has also issued guidance to ensure consistency across the Federal government." Department of State. (2025, June 18). *OMB No 1405-0004_FRN 30 Day FRN_PRA Supp Stment.* https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202502-1405-001

removed in November 2025, with agency documentation stating, "Sexual orientation - RETIRE to be compliant with the current Administration's Executive Orders."[37]

- In the National Survey on Drug Use and Health (NSDUH), the gender identity question which asked "Do you describe yourself as male, female, transgender, or do you use a different term?" was deleted, and the sex at birth question was modified from "What sex were you assigned at birth, on your original birth certificate?" to "Are you male or female?"[38]
- SOGI response options were also deleted from "reasons for bias incident" questions, such as in the Equal Employment Opportunity (EEO) Complaint Form, where "minor changes were made to previously approved EEO forms to reflect the removal of gender identity and sexual orientation as subcategories of sex discrimination."[39] Or in the National Survey of Family Growth (NSFG), which deleted the question: "During your life, how often have you felt that you were treated badly or unfairly because of your gender identity or sexual orientation?"[40]

REMOVAL MECHANISMS

We identified several procedural mechanisms through which SOGI measures were removed. These include modifications to data collections categorized as "*de minimis*," "non-substantive changes," "substantive changes" via Federal Register notice, discontinuations of complete collections, and suspected or unverified removals evidenced by changes to secondary products, such as reports and other publications. For modifications to collections that are not considered *de minimis,* the Paperwork Reduction Act (PRA) requires federal agencies to obtain approval from OMB's Office of Information and Regulatory Affairs (OIRA), which is requested by submitting memoranda that describe and justify the changes.[41] Most removals examined in this report were identified and analyzed using documents uploaded via RegInfo.gov as part of this process (found within the "supporting documentation" of a specific collection). The categories of removal are described further below.

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[37] Gender Identity was also removed from this collection. Administration for Children and Families (ACF). (2025, November 14). *Non-Substantive Change Request.* Department of Health and Human Services (HHS). https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202508-0970-010; Administration for Children and Families (ACF). (2025, November 14). RHY Program Specific Data Element - Collection Requirements. HHS. https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202508-0970-010&icID=245727

[38] Substance Abuse and Mental Health Services Administration (SAMHSA). (2025, September 29). *Non-substantive Change Justification Statement*. Department of Health and Human Services (HHS). https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202509-0930-012

[39] U.S. Department of the Treasury. (2025). *Individual complaint of employment discrimination form.* https://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=202504-1505-001&icID=230736

[40] No change request or FRN was found for this removal. The modification was identified by comparing the 2024 and 2025 questionnaires in RegInfo. National Center for Health Statistics (NCHS). (2025, July). *National Survey of Family Growth (NSFG): Reginfo Questionnaire.* U.S. Department of Health and Human Services. https://www.reginfo.gov/public/do/PRAICList?ref_nbr=202507-0920-018 & NCHS. (2024, April). NSFG Reginfo Questionnaire. HHS. https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202404-0920-003;

[41] "To ensure that the public record is accurate, agencies must submit, and OMB must review, documentation of all proposed revisions to an active collection before those revisions may be implemented." Sunstein, C. R. (2010, April 7). *Information collection under the Paperwork Reduction Act* [Memorandum]. Office of Management and Budget. https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/inforeg/PRAPrimer_04072010.pdf

De Minimis

"A de minimis change to a collection affects the 'look and feel' but does not change data elements collected or increase the collection's burden … does not need approval by OIRA before implementation and may be completed immediately."[42] Pursuant to the OMB memo issued in February 2025 regarding the implementation of Executive Order 14,168, modification to data collections where a gender question's response options included "male" and "female" only and the word "gender" is simply being replaced with the word "sex" are *de minimis* and may be made without OIRA approval.[43] We encountered many such changes in our research; however, these changes do not substantively alter the information we are able to learn about LGBT communities from a particular collection. Therefore, we excluded this type of modification from our analysis and our tallies.

Non-Substantive Change Requests (NSCRs)

"Unlike the de minimis changes, agencies submit, and OMB reviews, documentation for the proposed revisions to an active collection before those revisions may be implemented."[44] Pursuant to the OMB memo, the majority of the SOGI measure removals were requested through this mechanism.[45] Reginfo.gov frames non-substantive change requests (NSCR) this way: "Although such requests may result in changes in burden, they are deemed by OMB to be technical or ministerial."[46] Similarly, OMB guidance prior to 2025 instructed agencies to use NCSRs for "insignificant" changes.[47] In its memo regarding Executive Order 14,168, the OMB clarified that removal of an answer option does not necessarily constitute a substantive change to a collection and therefore does not require a period of public comment.[48] Accordingly, the guidance permits agencies to modify collections that have gender or sex

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[42] Shelanski, H. (2016, July 22). *Memorandum for the heads of executive departments and agencies and independent regulatory agencies: Flexibilities under the Paperwork Reduction Act for Compliance with Information Collection Requirements.* OIRA, OMB. https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/pra_flexibilities_memo_7_22_16_finalI.pdf

[43] "Various agencies have forms that intend to request a respondent's biological sex and provide response options in compliance with Exec. Order 14,168 (i.e., female, male), but the question includes terms not in compliance with the executive order (e.g., "What is your gender?"). In these cases, an agency may update the question to request "sex" instead of "gender" through a de minimis change, without further OIRA approval, as long as the response options set does not change…If the change involves adding or eliminating question response options, changing a question's purpose, eliminating a question, or adding a question, then it is not a de minimis change. Only a change that simply updates the terms in a question stem, but not its response options, is considered de minimis." Mancini, D. (2025, February 11). *Memorandum: Guidance on implementing section 3(e) of Executive Order 14168 in accordance with the Paperwork Reduction Act and the Privacy Act*. Office of Information and Regulatory Affairs, Office of Management and Budget. (Document not publicly available among OMB memos; found among ICR supporting documentation on Reginfo) https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202507-1601-002.

[44] See footnote 42 (Shelanski, 2016).

[45] OMB guidance states that, "In the context of changes pursuant to E.O. 14168, OIRA expects many collections can be updated through non-substantive change requests that are consistent with previous OIRA guidance." See footnote 43 (Mancini, 2025).

[46] Reginfo.gov. (n.d). Q&A: *What are the different types of information collection requests displayed on the ICR Dashboard?* https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#reg_rule . Accessed 2/1/2026.

[47] See footnote 42 (Shelanski, 2016).

[48] "As described in previous OIRA guidance, a non-substantive change must be approved by OIRA, but the agency does not need to first seek public comment to complete the change. Non-substantive changes are more significant than those considered de minimis, but they generally do not introduce new concepts or measures that have not been subject to public notice and comment. Whether a change to a collection is non-substantive depends on a variety of factors, including the purpose of the collection and the impact of the change on the collection's utility. A similar change may be considered non-substantive in the context of one collection, but not another…Generally, non-substantive changes may not be appropriate for collections where the change substantially alters the utility of the collection or where the removal of a response option or question could raise legal, regulatory, statutory, or statistical issues. For example, non-substantive changes may not be appropriate for collections that have been subject to litigation; collections associated with rulemaking (where the regulation specifies "gender" questions); or collections that may have statutory reporting

questions with response options other than male and female by removing those "extra" response options. OMB advises that agencies are also permitted to remove an entire question as a non-substantive change if the collection contains more than one sex or gender question, such as a two-step gender identity measure. In other words, agencies are encouraged to treat sex and gender measures as redundant constructs rather than distinct variables.

Additionally, sexual orientation questions were removed from numerous data collections via NSCRs. Executive Order 14,168 and the subsequent OMB memo do not require sexual orientation measures to be removed, nor does the memo authorize such removals or provide guidance categorizing sexual orientation removals as non-substantive. Few rationales were offered by agencies making these particular removals, though some NCSRs referenced Executive Order 14,151, which requires removal of Diversity, Equity, and Inclusion (DEI)-related language, and Executive Order 14,148, which rescinds President Biden's Executive Orders promoting nondiscrimination and equity for LGBT people.[49] For example, in the NSCR for the Survey of Earned Doctorates, it states, "NCSES [National Center for Science and Engineering Statistics] requests the suspension of the current ongoing collection of sexual orientation and gender identity (SOGI) questions, and a revision of the sex assigned at birth question. The SOGI items were added to the 2025 Survey of Earned Doctorates (SED) to comply with EOs 13985 and 14075, which have now been revoked by EO 14148. Removing the SOGI items and revising the sex assigned at birth item as described below will enable compliance with EOs 14148 and 14168."[50]

Federal Register Notices (FRNs)

The Federal Register is the U.S. government's official daily publication for documenting a wide range of executive branch actions.[51] Under the PRA, many types of agency actions must go through a formal process that requires publication in the Federal Register.[52] This process, sometimes called "notice-and-comment," applies to new data collections, data collections that have expired or are close to expiring to extend the life of the data collection (also knowns as an "extension without change"), data collections that were previously approved but discontinued/expired (also known as "Reinstatements with and without change"), or requests for a "substantive" change to the elements of the data collection (also known as a "revision" request).[53] For all these types of changes, agencies are required to publish a Federal Register

requirements for data on a respondent's "gender." Further, where collections ask about a respondent's "gender" for statistical purposes, agencies are encouraged to consult with their OIRA Desk Officer to clarify when a non-substantive change may appropriate." See footnote 43 (Mancini, 2025).

[49] Executive Order 14151*: Ending Radical and Wasteful Government DEI Programs and Preferencing*, 90 Fed. Reg. 8339 (Jan. 29, 2025); *EO 14148, Initial Rescissions of Harmful Executive Orders and Actions*, rescinds several executive orders related to SOGI, including: Executive Order 14075 (June 15, 2022), *Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals;* Executive Order 13988 (January 20, 2021), *Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*; and Executive Order 14021 (March 8, 2021), *Guaranteeing an Educational Environment Free From Discrimination on the Basis of Sex, Including Sexual Orientation or Gender Identity.* Executive Order 14148: Initial rescissions of harmful executive orders and actions, 90 Fed. Reg. 8237 (Jan. 28, 2025). https://www.federalregister.gov/documents/2025/01/28/2025-01901/initial-rescissions-of-harmful-executive-orders-and-actions

[50] National Science Foundation (NSF). (2025, March 31). *2025 Survey of Earned Doctorates: Non-substantive change request*. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202503-3145-003

[51] Reginfo. *FAQ: What is the Federal Register*? https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#reg_rule. Accessed 2/3/26.

[52] 44 U.S.C. § 3507.

[53] Reginfo. FAQ: *What are the different types of information collection requests displayed on the ICR Dashboard?* https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#icr_dashboard. Accessed 2/1/2026.

Notice (FRN), hold two periods of public comment, and then wait for approval by the OMB.[54] Agencies may choose to revise proposals in response to public comments; however, both the agencies and OMB are only required to "consider" these concerns. For example, in the second FRN for U.S. passport applications, the Department of State stated its intention to remove the "X" gender marker. Following the public comment period, the agency responded by removing the "X" gender marker as planned, while noting: "The Department received 1,620 responsive comments, one of which was in support of these changes. The majority of comments were opposed to these changes."[55]

While we documented many removals of SOGI data elements from data collections that went through this process, the majority of SOGI removals were not explicitly proposed or discussed in the Federal Register. In some cases, the removal was described in supporting documents. (e.g., "Supporting Statement A"). In other removals included as part of FRN publications, measure removals were identifiable only through direct comparison of questionnaire versions showing that the item was modified or removed. These are categorized as FRN presumptives.

Discontinuations

When a data collection is no longer in use, agencies are required to request that the collection be discontinued. However, this process is not as onerous as an NSCR or substantive change request.[56] Collection discontinuation is shown on the "history" page for a particular OMB number, and the OMB approval can be found in the "Notice of Action" document uploaded to the landing page for that particular request. Several collections that formerly contained SOGI measures were identified and are currently categorized as discontinued (See Findings: Removal Mechanisms). Documentation stating the reason for discontinuation has not been found for any of the collections in this report.[57]

Presumptive Removals

Presumptive removals are collections for which we do not have sufficient official documentation confirming the removal of SOGI from a collection, but where we believe it is likely that the measures

[54] 44 U.S.C. § 3507; "If the agency is considering significant or substantive revisions to the collection, it must provide the public with an opportunity to comment on the proposed revisions, as it would with a new collection." See footnote 41 (Sunstein, 2010); "The following process is used to obtain OMB approval for an information collection. 1. The agency develops an information collection that it wishes to implement. 2. The agency publishes a *Federal Register* notice about the proposed information collection and provides the public with 60 days to provide comment on the proposed collection. 3. The agency considers the public's comments and makes changes as appropriate to address concerns raised by the public. 4. The agency submits the ICR to OMB for review and publishes a second *Federal Register* notice announcing the start of OMB's review. The second notice provides the public with an additional 30 days to provide comments. 5. After reviewing the ICR and considering public comments, OIRA concludes its review by approving the collection or taking one of the other actions noted above." Reginfo.gov. (n.d.). *FAQ: How does an agency obtain OMB approval of an information collection?* https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#reg_rule. Accessed 2/1/2026.

[55] Department of State (2025, June 18). Application for a U.S. Passport: Supporting statement for paperwork reduction act submission. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202502-1405-001

[56] "The Paperwork Reduction Act requires collections to be renewed at least every three years. To ensure agencies are not allowing active collections to expire improperly, OMB's Office of Information and Regulatory Affairs (OIRA) requires agencies to submit a discontinuation request when they end the use of a collection."Office of Management and Budget. (2023*). Information collection budget of the United States government, 2018–2021.* Executive Office of the President. https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/05/2018-2021-ICB.pdf.; "Agencies may also discontinue collections at any time by submitting a short request to OMB." See footnote 41 (Sunstein, 2010).

[57] OMB. (2004). *Paperwork Reduction Act Collection Discontinuation Form [OMB FORM 83-D]* (which includes space to provide reason for discontinuation). https://www.energy.gov/cio/articles/omb83-d-discontinuance-form

have been removed. In many cases, the collection's page on RegInfo has not been updated; however, the collection's public-facing website indicates removal, usually through published research results. Many of these collections modified previously released reports or data products to remove SOGI results, which we verified using the Internet Archive's Wayback Machine.[58] In other instances, agencies published new reports in 2025 that excluded SOGI measures, even though they usually include them. These removals are sometimes noted by the report authors; for example, a National Child and Adolescent Wellbeing Survey (NCAWS) report published in July 2025 includes a data note which states, "Sex is reported based on the Executive Order 14,168."[59]

Inconclusive Evidence

There were several collections for which the continued inclusion or removal of SOGI measures was inconclusive based on the evidence available at the time of this report. In these cases, we were able to identify that SOGI measures had at some point been included or tested for inclusion, but we could not determine whether the collection ultimately retained them in 2025, or whether steps were taken to remove the measures. Some of these collections appeared to be administered only periodically, and we were unable to determine whether they had been permanently discontinued or altered in response to Executive Order 14,168 or other recent policy directives. We continue to monitor these collections.

[58] Internet Archive: Wayback Machine. https://web.archive.org/

[59] Administration for Children & Families (ACF).(2024, July). *NSCAW III Baseline Report (2017-2022): Child Well-Being.* https://acf.gov/sites/default/files/documents/opre/opre-NSCAW-III-baseline-child-wellbeing-jul25.pdf. Example of a similar report published in 2024: ACF.(2024, August). *NSCAW III Baseline Report (2017-2022): Child and Family Involvement with the Child Welfare System.* https://acf.gov/sites/default/files/documents/opre/NSCAWIIIBaselineChildFamilyCWSInvReport.pdf

DISCUSSION

Federal agencies had implemented sexual orientation and gender identity (SOGI) measures, inclusive language, and related protections across a wide range of data collections. As a result, federal SOGI data has informed policymakers, researchers, and service providers, enabling them to identify disparities, allocate resources equitably, and design programs that meet the needs of LGBT people, a group that constitutes a substantial portion of the population and that research has shown to be disproportionately at risk for economic insecurity, health disparities, and victimization.[60]

Much of this work is now being reversed under President Trump's executive orders. Removing SOGI measures from federal datasets undermines the ability to monitor and address inequities in health, employment, economic security, victimization, social services, and other well-established indicators of well-being. In practical terms, these decisions affect the health and safety of individuals and families, with consequences that span multiple domains and will continue to unfold over time as existing data becomes outdated and new data is not collected.

Reliable data collection plays a fundamental role in the democratic administration of the U.S. government. To this end, OMB has previously advised:

> *Federal information is both a strategic asset and a valuable national resource. It enables the Government to carry out its mission and programs effectively. It provides the public with knowledge of the Government, society, economy, and environment – past, present, and future. Federal information is also a means to ensure the accountability of Government, to manage the Government's operations, and to maintain and enhance the performance of the economy, the public health, and welfare. Appropriate access to Federal information significantly enhances the value of the information and the return on the Nation's investment in its creation … Agencies have a responsibility to provide information to the public consistent with their missions and subject to Federal law and policy. Agencies will discharge this responsibility by: a) Publishing public information online in a manner that promotes analysis and reuse for the widest possible range of purposes, meaning that the information is publicly accessible, machine-readable, appropriately described, complete, and timely.*[61]

[60] Herman, J. L., & Flores, A. R. (2025). *How Many Adults and Youth Identify as Transgender in the United States?* Williams Institute, UCLA School of Law. https://williamsinstitute.law.ucla.edu/publications/trans-adults-united-states; Williams Institute Scholars. (2025). Brief of Amici Curiae of Williams Institute Scholars in Support of Respondents 7, Chiles v. Salazar, No. 24-539. https://www.supremecourt.gov/DocketPDF/24/24-539/370799/20250826162449953_24-539%20Amicus%20Brief.pdf.; Congressional LGBTQ+ Equality Caucus. (2022). *Inaugural report on the condition of LGBTQ+ people.* U.S. House of Representatives. https://equality.house.gov/sites/evo-subsites/equality.house.gov/files/evo-media-document/cec-inaugural-report-on-the-condition-of-lgbtq%2B-people-12.15.22.pdf

[61] Office of Management and Budget (OMB). (2016). Circular No. A-130. Executive Office of the President. https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/OMB/circulars/a130/a130revised.pdf

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ABOUT THE WILLIAMS INSTITUTE

The Williams Institute is dedicated to conducting rigorous, independent research on sexual orientation and gender identity law and public policy. A think tank at UCLA Law, the Williams Institute produces high-quality research with real-world relevance and disseminates it to judges, legislators, policymakers, media, and the public. These studies can be accessed at the Williams Institute website.

FOR MORE INFORMATION

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RESEARCH THAT MATTERS

APPENDIX

Table A1. Federal data collections with sexual orientation and gender identity (SOGI) removals (listed alphabetically)

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
A Baseline of Injury and Psychosocial Stress for Applied Behavior Analysis (ABA) Workers	HHS/CDC	GI
ACF's Generic Clearance for Reviewer Recruitment Forms	HHS/ACF	GI
Adults with or Caring for Individuals with Congenital Heart Defects (CHD), Muscular Dystrophy (MD), and Spina Bifida (SB)	HHS/CDC	GI
Adverse Childhood Experiences Prevention Message Development	HHS/CDC	GI
Aerosols from Cyanobacterial Blooms: Exposures and Health Effects in a Highly Exposed Population	HHS/CDC	GI
AIDS Drug Assistance Program (ADAP) Data Report (ADR)	HHS/HRSA	GI
Alaska Guide Service Evaluation	DOI/FWS	GI
American Community Survey (ACS): Methods Panel Test	DOC/CENSUS	SOGI
American Housing Survey (AHS)	HUD/PD&R	GI
American Survey of Mortgage Borrowers (ASMB) [National Mortgage Database (NMDB) program]	FHFA	SOGI
AmeriCorps (Member Application, Enrollment, and Exit Forms)	CNCS (AmeriCorps)	GI
AmeriCorps Program Life Cycle Evaluation (Puerto Rico Bundled Evaluation)	CNCS (AmeriCorps)	GI
AmeriCorps Seniors (Grant Applications, Progress Reporting, Independent Living and Respite Surveys [Supplement])	CNCS (AmeriCorps)	GI & SOGI combined
AmeriCorps Seniors Programs COVID Effects Evaluation (Volunteers Survey, Senior Companion Survey, & Caregiver Survey)	CNCS (AmeriCorps)	GI
Annual Business Survey (ABS)	DOC/CENSUS	SOGI
Annual Protection and Advocacy of Individual Rights (PAIR): Performance Report (RSA-509)	ED/OSERS	GI
Annual Survey of Refugees	HHS/ACF	GI
Appeals Modernization Act (AMA) Established Notice of Disagreement (NOD) Survey	VA	GI
Application for Advance Permission to Enter as a Nonimmigrant (Form I-192)	DHS/USCIS	GI
Application for Citizenship and Issuance of Certificate Under Section 322 (Form N-600K)	DHS/USCIS	GI
Application for Correction of Military Record Under the Provisions of Title 10, U.S. Code, Section 1552	DOD/DEP	GI reporting
Application for Federal Firearms License	DOJ/ATF	GI
Application for Naturalization (Form N-400)	DHS/USCIS	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Application for Replacement Naturalization/Citizenship Document	DHS/USCIS	GI
Application for Significant Public Benefit Entrepreneur / Application for Entrepreneur Parole (Form I-941)	DHS/USCIS	GI
Application for Standard Government Headstone or Marker for Installation in Private or State Veterans Cemetery (VA FORM 40-1330M)	VA	GI
Application for T Nonimmigrant Status; Application for Immediate Family Member of T-1 Recipient; & Declaration of Law Enforcement Officer for Victim of Trafficking in Persons (Forms I-914, I914A & B)	DHS/USCIS	GI
Application for the Review of Discharge from the Armed Forces of the United States (DD Form 293)	DOD/DEP	GI reporting
Application for Travel Document (Form I-131)	DHS/USCIS	GI
Application to Register Permanent Residence or Adjust Status	DHS/USCIS	GI
Assessing Fatigue and Fatigue Management in U.S. Onshore Oil and Gas Extraction [National Institute for Occupational Safety and Health (NIOSH)]	HHS/CDC	GI
Assessing Public Preferences and Values to Support Coastal and Marine Management	DOC/NOAA	GI
Assessing Strategies to Promote Children's Engagement and Active Participation in Virtual Visits	HHS/HRSA	GI
Assessing the Use of Coaching to Promote Positive Caregiver-Child Interactions in Early Childhood Home Visiting Through Rapid Cycle Learning	HHS/HRSA	GI
Assessing the Use of Informal Contacts to Promote Caregivers' Engagement and Satisfaction with Early Childhood Home Visiting Through Rapid Cycle Learning	HHS/HRSA	GI
Assessment of Chemical Exposures (ACE) Investigations	HHS/TSDR	GI
Attorney General's Honors Program and Summer Law Intern Program (Applications)	DOJ/LA	SOGI
Be the Match® Patient Services Survey [National Marrow Donor Program (NMDP)]	HHS/HRSA	GI
Behavioral Risk Factor Surveillance System (BRFSS)	HHS/CDC	GI
Biographic Information for Deferred Action (Form G-325A)	DHS/USCIS	GI
Black Lung Clinics Program Performance Measures [Rural Health Network Development Planning Program Performance Improvement and Measurement System (PIMS)]	HHS	GI
Board Decision and Hearing Surveys	VA	GI
Brief HIV Bio-behavioral Assessment (NHBS-BHBA) [National HIV Behavioral Surveillance]	HHS/CDC	GI
Bureau of Health Workforce (BHW) Performance Report for Grants and Cooperative Agreements (PRGCA)	HHS/HRSA	GI
Bureau of Prisons Statistics	DOJ/BOP	GI
Campus Climate [Victimization] Survey [Now called: Student Perspectives and Experiences survey (SPES)?]	DOJ/OJP	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Casket/Urn Allowance (VA FORM 40-10088)	VA	GI
CDC and ATSDR Health Message Testing System (HMTS)	HHS/CDC	SOGI
CDC Division of Workforce Development (DWD) Fellowship Management System (FMS)	HHS/CDC	GI
CDC Usability and Digital Content Testing	HHS/CDC	GI
CDC's Minimal Data Necessary (MDN) for Case Data During an Emergency Response	HHS/CDC	GI
Census Bureau Generic Pretesting Clearance	DOC/CENSUS	GI
Census Bureau Opt-In Affinity Panel	DOC/CENSUS	GI
Census of Fatal Occupational Injuries	DOL/BLS	GI
Census of Juveniles in Residential Placement (CJRP) / Juvenile Facility Census Program (JFCP)	DOJ/OJP	SOGI
Center for Substance Abuse Prevention Online Reporting Tool (CORT)	HHS/SAMHSA	SOGI
Chafee Strengthening Outcomes for Transition to Adulthood (Chafee SOTA) Project Overarching Generic	HHS/ACF	GI
Challenges of Operational Environments Study	DOD/NAVY	SOGI
Child Support Agency Confidential Information (45 CFR 303.7 - Provision of Services in Intergovernmental IV-D: Federally Approved Forms)	HHS/ACF	GI
Children's Bureau Profile Questions on Reviewer Recruitment Module (RRM)	HHS/ACF	GI
Civil Rights Data Collection	ED/OCR	GI & GI reporting
Clinical Call Center Surveys	VA	GI
Communication Evaluation Assessing Foodborne, Waterborne and Mycotic Disease Prevention	HHS/CDC	GI
Community Living Centers Survey	VA/VHA	GI
Community Services Block Grant (CSBG) Annual Report	HHS/ACF	GI
Complaint of Employment Discrimination Involving a Federal (Sub) Contractor (Form CC-4 & CC-390)	DOL/OFCCP	SOGI reporting
Conversation Guide for Professionals on Substance Use, Children, and Families	HHS/ACF	GI
Coronavirus (COVID-19) Surveillance in Healthcare Facilities [National Healthcare Safety Network (NHSN)]	HHS/CDC	GI
Crash Report Sampling System (CRSS)	DOT/NHTSA	GI
Crop Management With or Without Cover Crops [Survey of farmers in Midwestern U.S.]	USDA	GI
Culture of Continuous Learning Project: Case Study	HHS/ACF	GI
Customer Data Worksheet Request for Business Partner Record Change	USDA	GI
Customer Outreach Survey	VA/VBA	GI
Declaration in Support of Establishing Parentage (45 CFR 303.7 - Provision of Services in Intergovernmental IV-D: Federally Approved Forms)	HHS/ACF	GI
Declaration of Financial Support (Form I-134)	DHS/USCIS	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Defense Enrollment Eligibility Reporting System (DEERS)	DOD	GI
Defense Organizational Climate Survey (DEOCS)	DOD/DEP	GI
DELTA Achieving Health Equity through Addressing Disparities (AHEAD) Cooperative Agreement Evaluation	HHS/CDC	GI
Developing a Framework to Identify and Address Job Hazards Unique to Women Mine Workers	HHS/CDC	SOGI
DHS Traveler Redress Inquiry Program (DHS TRIP): Traveler Inquiry Form (TIF)	DHS/TSA	GI
Diabetes Prevention Recognition Program (DPRP)	HHS/CDC	GI
Direct Reading Methodologies, Sensors, and Robotics Technology Assessment in Lab/Simulator-based Settings	HHS/CDC	GI
Disaster Human Services Case Management (DHSCM) Program	HHS/ACF	GI
DOL Cognitive and Psychological Research	DOL/BLS	GI
Domestic and International Clients Export Services and Customized Forms	DOC/ITA	GI & SOGI combined
Domestic Victims of Human Trafficking (DVHT) Program Data	HHS/ACF	SOGI
Dr. Nancy Foster Scholarship Program: Voluntary Evaluation	DOC/NOAA	GI
Driver Alcohol Detection System for Safety Field Operational Test (DADSS-FOT)	DOT/NHTSA	GI
EDFACTS	ED/NCES	GI
Educational Opportunity Centers Program (EOC)	ED/OPE	GI
Emergency Rental Assistance Program (ERA2)	TREAS/DO	GI
Employee Benefits Security Administration (EBSA) Participant Assistance Program Customer Survey	DOL/EBSA	SOGI
Employer Engagement Program: Performance Data	HHS/ACF	GI
Employer Information Report (EEO-1)	EEOC	GI
Employment Application [Tenn. Valley Authority]	TVA	SOGI combined
End Stage Renal Disease Death Notification (CMS-2746)	HHS/CMS	GI
End Stage Renal Disease Medical Evidence Report Medicare Entitlement and/or Patient Registration	HHS/CMS	GI
Enforcement and Removal Operations (ERO) [Form I-213] : Law Enforcement Systems and Analysis (LESA)	DHS	GI
Enhancing HIV Care of Women, Infants, Children and Youth Building Capacity through Communities of Practice	HHS/HRSA	GI
Ensuring Awareness of Benefits and Services of National Cemetery Administration (NCA) Survey	VA	SOGI
Enterprise Contact Center Council (ECCC) Member Services Contact Center Experience Survey	VA	GI
Enterprise Contact Center Council (ECCC) OSDBU Contact Center Experience Survey	VA	SOGI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Entrepreneurial Development Management Information System (EDMIS) Counseling Information Form & Management Training Report (SBA Form 641)	SBA	SOGI
EPA's Safer Choice Program Product and Partner Recognition Activities	EPA/OCSPP	GI
Equal Employment Opportunity (EEO) Complaint Form [Form No. TD F 62-03.5]	DOT	SOGI reporting
Equal Employment Opportunity (EEO) Complaint System	NRC	SOGI reporting
Essentials for Childhood (EfC): Preventing Adverse Childhood Experiences through Data to Action	HHS/CDC	GI & SOGI reporting
Ethnic Community Self-Help (ECSH) Program: Data Indicators	HHS/ACF	GI
Evaluation of Public Health AmeriCorps Member Alumni and Early Exit Survey	CNCS (AmeriCorps)	GI
Examining Distraction and Driver Monitoring Systems to Improve Driver Safety	DOT/NHTSA	GI
Expanding PrEP in Communities of Color (EPICC)	HHS/CDC	SOGI & GI reporting
Experiences of Soldiers in Alaska Option 20 Survey	DOD/DOA	SOGI reporting
Explosives Employee Possessor Questionnaire	DOJ/ATF	GI
Explosives Responsible Person Questionnaire (ATF Form 5400.13A/5400.16)	DOJ/ATF	GI
Family Planning Annual Report 2.0	HHS/HHSDM	GI
Family Report, Moving to Work (MTW) Family Report, MTW Expansion Family Report	HUD/PIH	GI
Family Violence Prevention and Services (FVPS): Grants to States and Tribes	HHS/ACF	SOGI combined
Family Violence Prevention Services: Culturally Specific Domestic Violence and Sexual Assault (CSDVSA)	HHS/ACF	SOGI
Family Violence Prevention Services: National, Special Issue, and Culturally Specific Resource Centers	HHS/ACF	SOGI combined
Family Violence Prevention Services: Specialized Services for Abused Parents and Their Children (SSAPC)	HHS/ACF	GI
Fatality Analysis Reporting System (FARS)	DOT/NHTSA	GI
FBI Criminal Justice Information Services (CJIS) Applicant Information (Form 1-783)	DOJ/FBI	GI
Federal Employee Viewpoint Survey (FEVS)	OPM	GI
Fee-for-Service Survey (FFS) (CMS - R-246) [Consumer Assessment of Health Care Providers and Systems (CAHPS)]	HHS/CMS	SOGI reporting
Forestry Service Workforce Development Participant Tracking	USDA/FS	GI
Formative Data Collections for DOL Research	DOL/BLS	GI
Free Application for Federal Student Aid (FAFSA)	ED	GI
Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) Annual Performance Report for Partnership and State Projects	ED/OPE	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Gender, Race, Ethnicity and Disability Identification for Federal Advisory Committees (EPA Form 5800-068)	EPA	GI
General Social Survey (GSS)	NSF-funded/ NORC	GI
General Testimony Form and Instructions [45 CFR 303.7 - Provision of Services in Intergovernmental IV-D]	HHS/ACF	GI
Geriatrics and Extended Care Access Survey	VA	GI
Government Performance and Results Act National Outcome Measures (GPRA NOMs) [Center for Mental Health Services]	HHS/SAMHSA	SOGI
Graduate Assistance in Areas of National Need (GAANN) Program	ED/OPE	GI
Health Center Patient Survey (HCPS)	HHS/HRSA	SOGI
Health Information National Trends Survey (HINTS)	HHS/NIH	GI
Health Insurance Marketplace Application (CMS-10440)	HHS/CMS	SOGI
Healthy Marriage and Responsible Fatherhood (Performance Measures and Additional Data Collection)	HHS/ACF	GI
HIV Quality Measures Performance Measure Module (HIVQM Module)	HHS/HRSA	GI
Hollings Prep Program (HPP) Surveys	DOC/NOAA	GI
Home Equity Conversion Mortgage (HECM) Counseling Standardization, Application for HECM Counselor Roster and Certificate of HECM Counseling	HUD/OH	GI
Home Study and Post-Release Services for Unaccompanied Children [formerly under Services Provided to Unaccompanied Children]	HHS/ACF	GI
Homeless Management Information System (HMIS)	HUD/CPD	SOGI
Homeowner Assistance Fund	TREAS/DO	GI
Household Trends and Outlook Pulse Survey (HTOPS)	DOC/CENSUS	GI
Housing Counseling Federal Advisory Committee (HCFAC)	HUD/OH	GI
Housing Opportunities for Persons with AIDS (HOPWA) Program	HUD/CPD	GI
Human Factors Considerations in Commercial Motor Vehicle Automated Driving and Advanced Driver Assistance Systems	DOT/FMCSA	GI
Human Interaction with Driving Automation Systems	DOT	GI
Immigration Customs Enforcement (ICE) Detention Statistics [Detention and Alternatives to Detention (ATD) statistics]	DHS/ICE	GI
Incident Reporting for the Unaccompanied Children Bureau [formerly under Administration and Oversight of the Unaccompanied Children Program]	HHS/ACF	GI
Indian Health Service Electronic Health Records System	HHS/HIS	SOGI
Integrated Postsecondary Education Data System (IPEDS)	ED/IES	GI
Interventions for Building Resilience for State and Local Health Department Staff Responding to Public Health Emergencies (Pilots Evaluation)	HHS/CDC	GI
Job Corps Application Data	DOL/ETA	GI
Job Corps Health Questionnaire	DOL/ETA	GI
Job Corps Placement Record	DOL/ETA	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Legacy Established Appeal	VA	GI
Low Income Home Energy Assistance Program (LIHEAP): Annual Report on Households Assisted	HHS/ACF	GI
Maternal and Child Health Bureau Performance Measures for Discretionary Grant Information System (DGIS)	HHS/HAS	GI
Maternal, Infant, and Early Childhood Home Visiting Program Performance Measurement Information System	HHS/HRSA	GI
mChoice: Improving PrEP Uptake and Adherence among Minority MSM through Tailored Provider Training and Adherence Assistance in Two High Priority Settings	HHS/CDC	GI
Medical Monitoring Project	HHS/CDC	GI
Medicare Advantage and Prescription Drug Plan (MA & PDP) [Consumer Assessment of Health Care Providers and Systems (CAHPS)]	HHS/CMS	SOGI reporting
Medicare Advantage Plan Survey (MAPS) [Consumer Assessment of Health Care Providers and Systems (CAHPS)]	HHS/CMS	SOGI reporting
Medicare Current Beneficiary Survey (MCBS)	HHS/CMS	GI & SOGI reporting
Mental Health Services Block Grant (MHBG) and the Substance Use Prevention, Treatment, and Recovery Services Block Grant (SUPTRS BG)	HHS/SAMHSA	GI
Message Testing for Tobacco Communication Activities	HHS/CDC	GI
Microenterprise Development (MED): Program Indicators [ACF Generic Performance Progress Reports]	HHS/ACF	GI
Migrant Student Information Exchange (via Minimum Data Elements, MDEs) (MSIX)	DOE/OME	GI
Model Medicare Advantage and Medicare Prescription Drug Plan Individual Enrollment Request Form (CMS-10718)	HHS/CMS	SOGI
Monitoring the Future (MTF)	NIH funded/UMich	GI
NARA Volunteer Service Application and Voluntary Intern Application	NARA	GI
National 4-H Conference Registration Form, Leadership Position Interest Form, and Scholarship Interest Form	USDA/NIFA	GI
National Ambulatory Medical Care Survey (NAMCS)	HHS/CDC	GI
National Artist Registry (GSA 7437) [Art in Architecture Program Center for Fine Arts]	GSA	GI
National Assessment of Educational Progress (NAEP)	ED/IES	GI
National Center for Health, Behavioral Health, and Safety's Training and Technical Assistance Offerings	HHS/ACF	GI
National Center on Parent, Family, and Community Engagement's (NCPFCE) [Training and Technical Assistance Offerings and Resources]	HHS/ACF	GI
National Child and Adolescent Wellbeing Survey (NCAWS)	HHS/ACF	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
National Communication System for Runaway and Homeless Youth Data Collection [National Runaway Safeline (NRS) Data Collection]	HHS/ACF	GI
National Coral Reef Monitoring Program (NCRMP): Resident Coral Reef Survey	DOC/NOAA	GI
National Crime Victimization Survey (NCVS)	DOJ/OJP	GI
National Domestic Violence Hotline (FVPS)	HHS/ACF	GI
National Driver Register (NDR)	DOT/NHTSA	GI
National Eye Institute's Intramural Research Program Application Form for electronic Individual Development Plan (eIDP)	HHS/NIH	GI
National Health and Nutrition Examination Survey (NHANES)	HHS/CDC	GI
National Health Interview Survey (NHIS)	HHS/CDC	GI
National Healthcare Safety Network (NHSN)	HHS/CDC	GI
National Healthy Start Evaluation and Quality Assurance	HHS/HAS	GI
National HIV Behavioral Surveillance (NHBS)	HHS/CDC	GI
National HIV Surveillance System (NHSS)	HHS/CDC	GI
National Household Food Acquisition and Purchase Study (FoodAPS)	USDA/ERS	GI
National Human Trafficking Hotline (NHTH) [Performance Indicators]	HHS/ACF	GI
National Inmate Survey (NIS) JAILS	DOJ/BJS	GI
National Inmate Survey (NIS) PRISONS	DOJ/BJS	GI
National Institutes of Health Loan Repayment Programs	HHS/NIH	GI
National Intimate Partner and Sexual Violence Survey (NISVS)	HHS/CDC	GI
National Maternal Health Hotline Phone Interview: Voluntary Partner Surveys	HHS/HRSA	GI
National Network of Sexually Transmitted Disease Clinical Prevention Training Centers (NNPTC)	HHS/CDC	SOGI
National Notifiable Diseases Surveillance System (NNDSS)	HHS/CDC	GI
National Park Service Case and Outbreak Investigation Data Collections	DOI/NPS	GI
National Park Service Preservation Values for Individual Animals	DOI/NPS	GI
National Park Service Recreation Fee Pricing Study-Survey Pre-Test and Pilot	DOI/NPS	GI
National Plan and Provider Enumeration System (NPPES) [formerly National Provider System]	HHS	GI
National Post-acute and Long-term Care Study: Data Collection for the Residential Care Community and Adult Day Services Center Components	HHS/CDC	GI
National Quitline Data Warehouse (NQDW)	HHS/CDC	GI
National Reporting System for Adult Education: Measures and Methods	ED/OCTAE	GI
National School Foods Study	USDA/FNS	GI
National Science Foundation Education and Training Application Pilot	NSF	GI
National Survey of Children's Health (NSCH)	DOC/CENSUS	SOGI reporting

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
National Survey of College Graduates (NSCG)	NSF	GI
National Survey of Family Growth (NSFG)	HHS/CDC	SOGI reporting
National Survey of Health Information Exchange Organizations (HIO)	HHS/ONC	SOGI
National Survey on Drug Use and Health (NSDUH)	HHS/SAMHSA	SOGI
National Traffic Safety Survey	DOT/NHTSA	GI
National Violent Death Reporting System (NVDRS)	HHS/CDC	GI
National Worker Survey	DOL/OS	GI
National Youth Tobacco Survey (NYTS)	HHS/CDC	SOGI*
NCA PreNeed Burial Planning [VA FORM 40-40007]	VA	GI
NOAA Research & Related Personal Data Applicant/Project Director/ Principal Investigator and Co-Applicant(s)	DOC/NOAA	SOGI
Noise Exposures and Hearing Loss in the Oil and Gas Extraction Industry [National Institute for Occupational Safety and Health (NIOSH)]	HHS/CDC	GI
Nondiscrimination Compliance Information Reporting	DOL/DM	GI & GI reporting
Nondiscrimination in Federally Assisted Commission Programs (NRC Forms 781 and 782) 10 CFR 4	NRC	SO reporting
Notice of Employee's Injury or Death; Employee's Claim for Compensation (Form 201 and Form LS-203; Longshore Act)	DOL/OWCP	GI
NWS Extreme Heat Social and Behavioral Sciences Research	NWS	GI
NWS Fire Weather Social and Behavioral Sciences Research	DOC/NOAA	GI
Occupational Exposures to Surgical Smoke in Veterinary Personnel	HHS/CDC	GI
Occupational Information Network (O*Net) Data Collection Program	DOL/ETA	GI
Office of Community Care Contact Center Experience Survey	VA	GI
Office of Community Services Affordable Housing and Supportive Services Demonstration Data Collection	HHS/ACF	GI
Office of Intramural Training & Education Application (OD)	HHS/NIH	SOGI
OneLab REACH (Rapid Education And Capacity-Building Hub)	HHS/CDC	GI
OPM Personnel Vetting Questionnaire	OPM	SOGI reporting
OSERS Client Assistance Program Annual Performance Report (RSA-227)	ED/OSERS	GI
OSERS Peer Reviewer Data Form	ED/OSERS	GI
Outpatient Veteran Safety Survey	VA	GI
Outreach and Assistance to Socially Disadvantaged and Veteran Farmers and Ranchers Program (Participant Response Form)	USDA/AgSEC	GI
Panelist Profile Data Collection	NEA	GI
Pathway Home Grant Program Evaluation (Follow up survey)	DOL/OS	GI
Pediatric Mental Health Care Access Program National Impact Study	HHS/HRSA	GI
Petition for U Nonimmigrant Status	DHS/USCIS	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Placement and Transfer of Unaccompanied Children into ORR Care Provider Facilities (Unaccompanied Child Profile [Form P-13])	HHS/ACF	GI
Population Assessment of Tobacco and Health Study (PATH)	NIH & FDA funded	GI
Portfolio Financing Report	SBA	GI
Pre-testing of ACF Data Collection Activities	HHS/ACF	SOGI
Pregnancy Risk Assessment Monitoring System (PRAMS)	HHS/CDC	GI reporting
Presidential Memorial Certificate (PMC)	VA	GI
Preventive Health and Health Services Block Grant	HHS/CDC	GI
Problematic Sexual Behavior in Children and Youth Information System (PSB–CY)	DOD/DODDEP	GI
Projects for Assistance in Transition from Homelessness (PATH): PDX Data Exchange	HHS/SAMHSA	GI
Public Health AmeriCorps Grantee Survey	CNCS (AmeriCorps)	GI
Railroad Trespassing Enforcement Grant: Report of Railroad Trespasser Form	DOT/FRA	GI
Rape Prevention and Education (RPE) Program	HHS/CDC	GI
Rapid Surveys System (RSS)	HHS/CDC	GI
Readjustment Counseling Service (RCS) Awareness Survey	VA	SOGI
Readjustment Counseling Service (RCS) Vet Centers Surveys	VA	GI
Reducing Fatigue Among Taxi/Rideshare Drivers	HHS/CDC	GI
Refugee Agricultural Partnership Program (RAPP)	HHS/ACF	GI
Refugee Data Submission System: Formula Funds Allocations and Service Analysis	HHS/ACF	GI
Refugee Family Child Care Microenterprise (RFCCMED) Program	HHS/ACF	GI
Refugee Individual Development Accounts (IDA) Program	HHS/ACF	GI
Refugee Resettlement Refugee Career Pathways (RCP) Program	HHS/ACF	GI
Rehabilitation Services Administration (RSA) Payback Information Management System	ED/OSERS	GI
Replication of Recovery and Reunification Interventions for Families-Impact Study (R3-Impact)	HHS/ACF	SOGI
Report of Program Settings: Children Receiving Early Intervention Services	ED/OSERS	GI
Request for Commemorative Plaque or Urn for Veteran Cremains (VA FORM 40-1330UP)	VA	GI
Research and Development Survey (RANDS)	HHS/CDC	GI
Research Performance Progress Report (RPPR): Standard OMB form	DOC/OS	SOGI
Resident Perceptions of Offshore Wind Energy Development Surveys	DOC/NOAA	GI
Ronald E. McNair Postbaccalaureate Achievement Program	ED/OPE	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Runaway and Homeless Youth Homeless Management Information System (RHY - HMIS)	HHS/ACF	SOGI
Ryan White HIV/AIDS Program (RWHAP)	HHS/HRSA	GI
Safety Impacts of Human-Automated Driving System (ADS) Team Driving Applications	DOT/FMCSA	GI
SAMHSA Unified Performance Reporting Tool (SUPRT)	HHS/SAMHSA	SOGI
SBIC Financial Reports	SBA	GI
School Crime Supplement (SCS) [NCVS]	DOJ/OJP	GI reporting
Service Academy Gender Relations Survey (SAGR) now Services Academy Experiences Survey (SAES)	DOD/DODDEP	GI
Services for Survivors of Torture (SOT) Program	HHS/ACF	GI & SOGI reporting
Services Provided to Unaccompanied Children (Admission form S-18)	HHS/ACF	GI
Services to Afghan Survivors Impacted by Combat (SASIC) Program	HHS/ACF	SOGI
Sexual Risk Avoidance Education (SRAE) Program Performance Analysis Study (PAS)	HHS/ACF	GI
SOAR Demonstration Grant Program Data (Stop, Observe, Ask, Respond to Health and Wellness Training)	HHS/ACF	SOGI
Standards for Success Reporting	HUD/HUDSEC	GI
State Data Transfer (DOT/NHTSA)	DOT/NHTSA	GI
State Unintentional Drug Overdose Reporting System (SUDORS)	HHS/CDC	GI
State Vocational Rehabilitation (VR) program: Case Service Report (RSA-911)	ED/OSERS	GI
STI Surveillance Network (SSuN)	HHS/CDC	GI
Student and Exchange Visitor Information System (SEVIS)	DHS/ICE	GI
Student Experience Assessment of Job Corps Centers	DOL/ETA	SOGI
Student Safety Assessment of Job Corps Centers	DOL/ETA	GI
Student Support Services (Annual Performance Report)	ED/OPE	GI
Sudden Death in the Young Case Registry [National Fatality Review Case Reporting System (NFR-CRS)]	HHS/CDC	SOGI & SOGI reporting
Suicide Prevention 2.0 Program - Community Opinion Survey	VA/VHA	GI
Support and Scale-Up of HIV Prevention Services in Sexual Health Clinics (SHIPS) [The Performance Measures Project: Improving Performance Measurement and Monitoring by CDC Programs]	HHS/CDC	GI
Support for Trauma-Affected Refugees (STAR) Annual Program Data	HHS/ACF	SOGI
Supporting Youth to be Successful in Life (SYSIL) Study	HHS/ACF	GI
Supportive Services for Veteran Families (SSVF) Program	VA	GI
Survey of Earned Doctorates (SED)	NSF	SOGI
Survey of Household Economics and Decision-making (SHED)	FRS	GI
Survey of Inmates in Local Jails (SILJ)	DOJ/OJP	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Survey of Service Academy Students	GAO	GI
Survey on Sexual Victimization (SSV-IJ & SSV5) Substantiated Incident Form (Juvenile) & State Juvenile Facilities	DOJ/ OJP	GI
Survey on Sexual Victimization (SSV) [1, 2, 3, 4, IA, 6]	DOJ/ OJP	GI
System of Records: Consumer Financial Protection Bureau Advisory Boards and Committees	CFPB	GI
Teen Pregnancy Prevention Performance Measures	HHS/OASH	SOGI
Telehealth Surveys	VA	GI
Temporary Assistance for Needy Families (TANF) Data Reporting for Work Participation	HHS/ACF	GI
Testing Identified Elements for Success in Fatherhood Programs	HHS/ACF	GI
The Community Choice Demonstration [formerly known as the Housing Choice Voucher Mobility Demonstration]	HUD/PD&R	GI
The Division of Workforce Development (DWD) Fellowship Alumni Assessment	HHS/CDC	GI
The GAIN (Greater Access and Impact with NAT) Study: Improving HIV Diagnosis, Linkage to Care, and Prevention Services with HIV Point-of-Care Nucleic Acid Tests (NATs)	HHS/CDC	GI
The Real Cost Campaign Outcomes Evaluation Study: Cohort 3 (Outcomes Study)	HHS/FDA	GI
The Real Cost Campaign Study: Monthly Implementation Assessment	HHS/FDA	GI
The Study to Explore Early Development (SEED) [Follow-up Study]	HHS/CDC	GI
Toolkit Protocol for the Crisis Counseling Assistance and Training Program (CCP)	HHS/SAMHSA	GI
Tornado Watch/Warning Post-Event Evaluation [National Severe Storms Laboratory (NSSL)]	DOC/NOAA	GI
Trafficking Victim Assistance Program (TVAP)	HHS/ACF	SOGI
Training and Technical Assistance (TTA) Program Monitoring	HHS/SAMHSA	GI
Transitional Coverage and Retroactive Medicare Part D Coverage for Certain Low-Income Beneficiaries through the Limited Income Newly Eligible Transition (LI NET) Program (CMS-10831)	HHS/CMS	SOGI
Tribal Housing and Urban Development Veteran Administration Supportive Housing Program	HUD/PIH	GI
Tribal Maternal, Infant, and Early Childhood Home Visiting Program Data Reports	HHS/ACF	GI
U.S. Passport Application	STATE/AFA	GI
U.S. Passport Application: Name Change, Data Correction, and Limited Passport Book Replacement	STATE/AFA	GI
U.S. Passport Renewal Application for Eligible Individuals	STATE/AFA	GI
U.S. Repatriation Program Forms (RR-05)	HHS/ACF	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Unaccompanied Children Assessments for Children and Sponsors [formerly under Services Provided to Unaccompanied Children]	HHS/ACF	SOGI
Unaccompanied Refugee Minors Program: Application, Withdrawal of Application or Declination of Placement Form	HHS/ACF	GI
Unaccompanied Refugee Minors Program: ORR-3 Placement Report and ORR-4 Outcomes Report	HHS/ACF	GI
Understanding and Expanding the Reach of Home Visiting (HV-REACH) Project	HHS/ACF	GI
Understanding HIV/STD Risk and Enhancing PrEP Implementation Messaging in a Diverse Community-Based Sample of Gay, Bisexual, and Other Men Who Have Sex with Men	HHS/CDC	GI
Understanding Resource Utilization to Support Male Sailor Operational Readiness (MOSAIC)	DOD/NAVY	SOGI
Understanding the Human Response to Water Hazards: National Weather Service Flooding Survey	DOC/NOAA	GI
Unified Certification System	SBA	GI
Uniform Data System (UDS)	HHS/HRSA	SOGI
Uniformed Services Employment and Reemployment Rights Act (USERRA) and Veterans' Preference (VP) and Veterans' Employment Opportunities (VEOA) Claim Form (VETS-1010 Form)	DOL/ASVET	GI
Upward Bound Math Science (UBMS) Annual Performance Report	ED/OPE	GI
US Core Data for Interoperability (USCDI) [formerly Common Clinical Data Set]	HHS/ONC	SOGI
VA Health Benefits: Application, Update, Hardship Determination (VA Forms 10-10EZ,10-10EZR, 10-10HS)	VA/VHA	GI
VA Liaison Customer Experience Survey	VA	GI
VA Wide Trust Survey	VA	SO
Verification of Eligibility for Burial in a National Cemetery (VA FORM 40-4962)	VA	GI
Veteran Experience Action Event Survey	VA	GI
Veteran Financial and Credit Counseling Services Survey (VA Form 10-377)	VA	GI
Veteran Rapid Retraining Assistance Program (VRRAP) Experience Surveys	VA	GI
Veteran, Family, and Community Engagement (VFCE) Peer-to-Peer Survey (Participant)	VA	GI
Veterans Engagement Action Center (VEAC) Surveys	VA	GI
Veterans Upward Bound (VUB) program	ED/OPE	GI
Veterans' Employment and Training Service	DOL/ASVET	SOGI
VHA Homeless Programs: Project CHALENG for Veterans Survey (Form 10-10161)	VA/VHA	GI
Voluntary Agencies Matching Grant Program	HHS/ACF	GI
West Coast Fisheries Participation Survey	DOC/NOAA	SOGI combined
Women's Digitalization (Entrepreneur Learning) Initiative (ELI) Registration	SBA	GI

DATA COLLECTION (N=360)	AGENCY/ SUB AGENCY	SOGI MEASURE REMOVED
Workforce Innovation and Opportunity Act (WIOA) Performance Accountability, Information, and Reporting System	DOL	SOGI
Workforce Recruitment Program (WRP)	DOL/ODEP	GI & SOGI combined
Workplace & Gender Relations Survey of Military Members (WGR) [now Workplace Experiences Survey of Military Members (WESM)]	DOD	GI
Workplace and Gender Relations Survey (WGR)- Civilian Employee [now Civilian Employee Workplace Experiences Survey (WESC)]	DOD	GI
Workplace Discrimination Complaints (FCC EEO Form 5621 & 5622)	FCC/OWD	GI reporting
Youth Conservation Corps (Application and Medical History Forms)	DOI/OS	GI
Youth Risk Behavior Surveillance System (YRBSS)	HHS/CDC	GI

Note: SOGI measure removed: SOGI = Sexual orientation and/or gender identity demographic measure; SOGI reporting = Bias-motivated incident measure inclusive of sexual orientation and/or gender identity; SOGI combined = measure which assesses sexual and gender minority status as one group, such as LGBTQ. *This collection modified the sexual orientation response options to: “Straight or heterosexual” or “Not heterosexual.” See footnote 8 (CDC: NYTS, 2025).