



# NATIONAL LGBTQ INSTITUTE ON IPV

May 10, 2018

National LGBTQ Institute on Intimate Partner Violence  
PO Box 18436  
Seattle, WA 98118

Jennifer Truman  
Bureau of Justice Statistics  
810 Seventh Street NW  
Washington, DC 20531  
Jennifer.Truman@ojp.usdoj.gov

**Re: OMB Number 1121-0111; Agency Information Collection Activities: Proposed eCollection eComments Requested; Revision of a currently approved collection; comments requested: National Crime Victimization Survey (NCVS)**

Dear Ms. Truman,

On behalf of the [National LGBTQ Institute on Intimate Partner Violence](#), we write in opposition to the Department of Justice's Bureau of Justice Statistics' (BJS) proposal to raise the minimum age for respondents of the National Crime Victimization Study (NCVS) to be asked about their sexual orientation and gender identity from 16 to 18.

The National LGBTQ Institute on Intimate Partner Violence is a national training and technical assistance provider that works with diverse stakeholders to increase access to meaningful services for LGBTQ survivors of intimate partner violence. As a joint project of the Northwest Network of Bi, Trans, Lesbian and Gay Survivors of Abuse and the National Coalition of Anti-Violence Programs, the LGBTQ Institute is committed to increasing public awareness and enhancing local, state, and national efforts to prevent and address violence against LGBTQ people.

In the field of intimate partner violence, we value privacy, discretion, and consent, and have worked for decades to ensure privacy and sensitivity around data collection on violence. We believe that it's important to assess the sensitivity of questions on national surveys, and **the NCVS already adheres to national standards of privacy and sensitivity.**

Given that the NCVS asks participants to provide detailed accounts of their experiences of sexual, intimate partner, hate and other types of violence, which can be sensitive and challenging for survivors, considerable care has gone into the selection of survey questions and how the information is collected. The questions in NCVS have been informed by experts in the field and piloted extensively to ensure their sensitivity and appropriateness. Further, all questions are voluntary, so participants can skip any questions they do not want to answer. This is true for the questions about violence as well as those about demographics, including the questions on sexual orientation and gender identity.

**LGBTQ people face significant levels of violence.** A [survey](#) of over 26,000 Minnesotan college students found that 47 percent of bisexual students had experienced sexual assault in the past year. In 2015, the National Center for Transgender Equality [surveyed](#) over 27,000 transgender people across the country: Nearly a quarter reported being physically attacked when they were in primary or secondary school. An [analysis](#) of the Youth Risk Behavior Survey, another federal survey of high-school age youth that asks questions about sexual orientation, found that lesbian, gay, and bisexual youth are at increased risk for dating violence.

It is particularly important to collect information on younger LGBTQ survivors of violence as **younger people are especially vulnerable to violence and other crimes committed by someone in their family**. In 2017, an [annual survey](#) by the National Coalition of Anti-Violence Programs found that people under age 25 were almost five times more likely to report experiencing violence by a relative. And according to an [older analysis](#) of the factors leading to increased risk of homelessness for LGBTQ youth, a quarter of bisexual youth reported that they experienced homelessness because of physical abuse inflicted by their parents.

There are myriad reasons LGBTQ people—particularly young people, those of color, gender non-conforming people, and individuals who are not safely out to their families—[might want to avoid](#) reporting a crime to the police. And since the NCVS helps allocate federal and state funding toward crime prevention, understanding the true level of crime incidence is crucial.

By adding the questions regarding sexual orientation and sexual identity, policymakers can produce a [more accurate picture](#) of crime victims and properly allocate funds for crime prevention and victim support. It also provides the opportunity to examine the relationship between LGBTQ status and the nature of their contact with law enforcement, thus providing policymakers with the opportunity to find ways to strengthen these relationships and increase the likelihood that LGBTQ people will report crimes and have access to appropriate victim services.

**Youth have been answering sexual orientation and gender identity questions in state and federal surveys for many years.** According to the Williams Institute’s [SMART report](#), “[s]exual orientation questions have been asked on large-scale school-based surveys of adolescents around the world since the mid-1980’s.” The SMART report details numerous surveys asking questions of youth’s sexual orientation and gender identity. For example, BJS’s own National Survey of Youth in Custody includes a measure of sexual orientation for youth over the age of 14, and it has provided a wealth of important information about disproportionate incarceration and sexual victimization of sexual minority youth in custody. The CDC’s National Youth Risk Behavior Risk Survey includes respondents as young as 13 and has included sexual orientation measures since 2015. In 2015, more than 15,500 youth from across the country filled out the YRBS survey on their own, anonymously at school. The National Survey of Family Growth, which includes respondents as young as 15, has included a sexual orientation behavior measure for many years. The California Health Interview Survey has asked youth about their gender expression since 2015. There are many more examples of surveys and studies that have successfully collected sexual orientation and gender identity data from youth, including the L.A. Foster Youth Study (which included adolescents as young as 12). Each of the surveys and studies provides invaluable information about LGBTQ youth that have impacted policy making and programming in a variety of settings.

**In conclusion, we encourage the Bureau not to raise the minimum age for the sexual orientation and gender identity questions.** This data is important to collect, respondent sensitivity is already adequately considered, and LGBTQ youth in particular need somewhere to report these crimes.

Please don’t hesitate to reach out with any questions or concerns.

Sincerely,

Emily Waters, MSW/MPH, Senior Manager of National Research and Policy  
National Coalition of Anti-Violence Programs, New York City Anti-Violence Project

Carrie Lippy, PhD, Research and Evaluation Coordinator  
The NW Network of Bi, Trans, Lesbian, and Gay Survivors of Abuse

Heron Greenesmith, Esq, Public Policy Consultant  
National Coalition of Anti-Violence Programs, New York City Anti-Violence Project



**National LGBTQ Institute on IPV**

PO Box 18436 Seattle, WA 98118

P: (206) 568-7777 [www.lgbtqipv.org](http://www.lgbtqipv.org)