**November 2, 2026**

**Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket No. USBC-2026-0628; 91 FR 57524)**

To the U.S. Census Bureau:

The National Academy of Sciences (NAS) and the National Academy of Medicine (NAM) appreciate the opportunity to comment on the Census Bureau's proposed changes to residence criteria and demographic data collection for the decennial census. As part of the National Academies of Sciences, Engineering, and Medicine, NAS and NAM draw on the expertise of leading scientists, researchers, and health professionals to provide independent, evidence-based advice to government and the public. Our comments are grounded in decades of National Academies work on census methodology, federal statistics, and data infrastructure, particularly through the Committee on National Statistics (CNSTAT). Established in 1972, CNSTAT provides independent assessments of federal statistical programs and develops recommendations to improve statistical methods, data quality, and the information available to support research and public policy. Its flagship report, *Principles and Practices for a Federal Statistical Agency* (2025), now in its eighth edition, outlines a set of principles that have guided the work of the federal statistical system for decades.

The decennial census is foundational to the nation's scientific and statistical infrastructure. As the National Academies' 2023 consensus report, *Assessing the 2020 Census: Final Report*, emphasizes, census data underlie government and business planning, the allocation of federal resources, and countless public and private uses, including the calculation of population-based public health measures. Its accuracy, completeness, and reliability are therefore critical not only to government operations but also to American scientific leadership and the broader research enterprise.

We support the Census Bureau's goals of improving enumeration accuracy, reducing respondent burden, protecting confidentiality, and promoting operational efficiency. However, the proposed changes raise significant concerns that extend beyond the decennial census itself. As outlined below, eliminating race and ethnicity questions and revising residence criteria could undermine the quality and completeness of census data, with consequences for scientific research, federal statistical programs, and public health. We urge the Bureau not to finalize these provisions in their current form and to ensure that any substantial changes are supported by rigorous scientific evidence and testing.

**The decennial census provides essential infrastructure for scientific research and national statistics.** Census data provide benchmarks for designing and weighting federal surveys, including the American Community Survey (ACS); denominators for calculating population-based rates; and baselines for population estimates and projections. Detailed geographic and demographic data enable researchers to examine population trends and differences across communities and over time, particularly for small geographic areas and population groups that sample-based surveys cannot reliably capture.

The National Academies have long documented these essential functions. *Modernizing the U.S. Census* (1995) identified three primary research uses of census data: describing population characteristics and geographic distribution, supporting analyses of other data sources, and designing representative research samples. More recently, *Toward a 21st Century National Data Infrastructure:*

*Enhancing Survey Programs by Using Multiple Data Sources* (2023) examined the growing integration of survey, administrative, and other data sources in federal statistics. While recognizing the opportunities these sources offer, the report emphasized that their use requires careful evaluation of data quality, population coverage, and potential errors introduced through data linkage and integration to ensure that resulting statistics are accurate and fit for their intended purposes.

Because so many statistical products depend on census data, changes that diminish their completeness, reliability, or comparability can have far-reaching consequences for scientific research and the broader federal statistical system. The proposed changes must therefore be evaluated not only for their effects on congressional apportionment and operational efficiency, but also for their downstream impacts on the accuracy and utility of national statistics.

**Eliminating race and ethnicity questions would compromise quality and utility of census data.** The proposed rule would prohibit questions about race and ethnicity on the decennial census questionnaire and other questionnaires used for population enumeration, representing a significant departure from longstanding practice and National Academies recommendations. In *Assessing the 2020 Census*, a CNSTAT panel documented differences in coverage across racial and ethnic groups, including undercounts associated with omissions and lower self-response rates. Rather than recommending the elimination of race and ethnicity questions, the panel recommended adopting an improved, combined race and ethnicity question for the 2030 Census, along with further research on question design and methods to preserve comparability with earlier censuses. This recommendation is consistent with the 2024 revisions to Statistical Policy Directive No. 15, which established updated federal standards for collecting and reporting race and ethnicity, including a combined question and more detailed categories.

These recommendations reflect the scientific value of reliable demographic information for understanding the changing composition of the American population, including differences in ancestry, community characteristics, and population trends. While racial and ethnic classifications have evolved over time and cannot fully capture the complexity of individual identities or cultural backgrounds, they remain important tools for research, planning, and public services. As recognized in *Modernizing the U.S. Census*, the appropriate scientific approach is to develop well-tested questions that produce accurate and useful data. Eliminating race and ethnicity questions would instead remove a critical source of information for assessing census coverage, understanding population differences, and supporting scientific research.

The proposed rule suggests that demographic information could continue to be obtained through the ACS and administrative records. However, these sources cannot be presumed to provide equivalent substitutes for information collected directly through the decennial census. Unlike decennial enumeration, the ACS relies on a sample, limiting the precision of estimates for small geographic areas and population groups. *Realizing the Potential of the American Community Survey: Challenges, Tradeoffs, and Opportunities* (2015) documented these limitations, even when multiple years of data are combined. Similarly, *Toward a 21st Century National Data Infrastructure: Enhancing Survey Programs by Using Multiple Data Sources* (2023) recognized the value of administrative records while emphasizing the need to assess completeness, accuracy, and representativeness. The availability of alternative sources does not establish they can reproduce the geographic detail, reliability, or comparability of demographic data collected through the decennial census. Because the ACS and other surveys rely on decennial census benchmarks to assess representativeness and adjust survey

weights, eliminating race and ethnicity data could introduce or compound coverage and nonresponse biases across the broader federal statistical system.

The Bureau also cites respondent burden, response rates, and confidentiality as reasons for eliminating demographic questions. Proposed §70.3(b) would prohibit publication of individual demographic data if doing so necessitates introducing uncertainty into national or state population counts. The Bureau should clarify how this restriction would apply and evaluate whether it would unnecessarily constrain confidentiality-protection methods or the release of useful statistics. *Assessing the 2020 Census* recommended a framework for balancing confidentiality risks with data utility, along with comprehensive testing and engagement with data users in developing census products. The Bureau should evaluate disclosure-avoidance approaches in terms of confidentiality risks, population-count accuracy, and the availability and utility of detailed demographic data.

**The proposed residence criteria raise significant concerns about population coverage and enumeration accuracy.** The proposed rule would exclude foreign citizens who lack U.S. citizenship or lawful permanent resident status from congressional apportionment counts. It would define usual residence by the greatest number of days lawfully spent at a residence between January 3 and April 1 and specify that residence should be supported by tax records. The Bureau is also considering administrative records or a legal-status question to determine which foreign citizens would be included in the apportionment count.

In *Once, Only Once, and in the Right Place: Residence Rules in the Decennial Census* (2006), a CNSTAT panel, working from the objective of a census of residents rather than citizens, recommended counting all people living in the United States, including noncitizens, at their usual residence. The proposed criteria depart from that methodological framework. Tax records are not designed to establish census residence and may be incomplete or outdated, particularly for individuals who do not file taxes or have complex living arrangements. The Bureau should test the accuracy of residence assignments under the January 3–April 1 rule and evaluate any resulting differences in coverage across population groups.

Administrative records can improve enumeration, but their use requires careful validation. *Assessing the 2020 Census* supported their use as a supplement to census operations while concluding that enumerating a substantial share of the population without a contact attempt did not appear feasible for 2030. The proposed use of records to determine residence and legal status likewise requires validation for those distinct purposes. The Bureau should also assess whether administrative-record coverage, record linkage, and classification errors differ systematically across demographic and geographic groups.

Legal-status classification poses a separate challenge: citizenship alone would not distinguish lawful permanent residents from other noncitizens. Research associated with the 2019 Census Test found that including a citizenship question widened differences in self-response and household-roster omissions for households with at least one likely undocumented member (Brown and Heggeness, 2026). Although a legal-status question would require separate evaluation, these findings underscore the importance of testing potential effects on response and coverage.

**The proposed changes could undermine health research, public health response, and health care planning.** Accurate census data are essential for understanding health risks and directing care to communities that need it. Population counts provide the denominators used to calculate disease

incidence and mortality rates, allowing researchers and public health agencies to identify emerging problems and evaluate interventions. For example, the National Cancer Institute's cancer surveillance program relies on census-derived population estimates to calculate cancer rates by age, race, ethnicity, and geography. Without reliable demographic data, higher rates of disease may go undetected, particularly in smaller communities. These uses were documented in the National Academies' *2020 Census Data Products: Data Needs and Privacy Considerations* (2020) and *Assessing the 2020 Census*, which highlighted how inaccuracies in population data can distort health statistics and potentially misdirect public health interventions.

Beyond research, census data inform decisions that directly affect access to care, including where to locate health centers, how to identify communities with shortages of physicians and other health professionals, and where to target vaccination, screening, and prevention programs. Detailed race and ethnicity data help identify differences in health outcomes and inform services that respond to the needs of local populations. Eliminating these data from the decennial census could make it more difficult to identify underserved communities and allocate limited health resources effectively.

Census-derived population estimates also inform federal funding for major health programs, including Medicaid and the Children's Health Insurance Program (CHIP). Census Bureau population estimates are used to calculate state per capita income, which helps determine regular federal Medicaid matching rates relative to national income levels. CHIP allotment calculations also incorporate a child-population-growth factor based on Census Bureau estimates. Inaccurate population estimates could affect funding allocations and resources available to provide care. Although the proposed residence criteria apply specifically to congressional apportionment, the Bureau should clarify whether and how the proposed changes could affect population estimates used for these programs. Preserving accurate and comprehensive population data is essential to ensuring health research, public health decisions, and health care resources reflect the needs of the communities they serve.

To address these concerns, we urge the Bureau to:

1. **Retain race and ethnicity questions in the decennial census.** Preserve direct collection of these data and continue efforts to improve question design, accuracy, and comparability, consistent with CNSTAT's recommendations for the 2030 Census in *Assessing the 2020 Census*. ACS and administrative records, while valuable, cannot be presumed to provide equivalent substitutes for detailed demographic data collected through the decennial census.

2. **Retain current residence criteria pending methodological evaluation of the proposed changes.** Compare proposed residence assignments with established rules using 2020 Census data where feasible, assessing omissions, duplication, geographic misallocation, and differential coverage errors across population groups. Validate the accuracy and completeness of administrative records used to determine residence and legal status, including for individuals who do not file taxes. Experimentally test any proposed legal-status question for effects on household self-response, item nonresponse, household omissions, and follow-up workload across demographic and geographic groups.

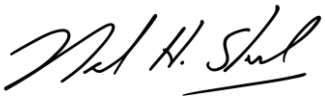
3. **Evaluate and document the implications for the broader federal statistical system.** Clarify how proposed changes to demographic data collection, data release, and residence criteria would affect statistical products beyond congressional apportionment, including population

estimates and data used for federal surveys, scientific research, public health surveillance, and resource allocation. Evaluate effects on comparability over time and on methods that impute missing race and ethnicity data from other sources. Assess the scientific basis for proposed restrictions on demographic data collection and related implications for future data needs. Neither administrative records nor model-based estimates should be presumed equivalent to directly collected census data.

4. **Ensure that future changes are grounded in scientific evidence, transparency, and independent expert review.** Publish testing methods and results consistent with Census Bureau standards for instrument development (A2), collection methods (B1), nonsampling error (D3), and transparency (F2). Consult data users, other federal statistical agencies, and the U.S. Chief Statistician, and subject the supporting evidence to independent expert review before implementation. Evaluate whether the Bureau's objectives of improving response rates, reducing burden, and protecting confidentiality can be achieved while preserving essential statistical information through evidence-based approaches consistent with applicable confidentiality requirements.

The decennial census is among the nation's most important scientific resources. As emphasized in *Principles and Practices for a Federal Statistical Agency*, the credibility and value of federal statistics depend on their accuracy, relevance, independence, and the trust of those who produce and use them. Changes of the magnitude proposed here warrant careful scientific evaluation and a clear demonstration that they will preserve or improve data quality. We urge the Census Bureau to preserve essential demographic information and pursue approaches that strengthen the integrity and utility of the decennial census for scientific research, public policy, and the communities it serves.

Sincerely,



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