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Appointed Officials (NALEO) Education Fund

October 20, 2026

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket No. 260903-0005)

To whom it may concern:

On behalf of The Census Project, a coalition we lead of over 800 national, state, and local organizations representing thousands of census stakeholders and data users in the public, private, non-profit, and research sectors, we are writing in response to the proposed rule, "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions."

The Census Project is an incredibly diverse coalition of organizations that share a common goal of supporting the U.S. Census Bureau and its mission to deliver timely, accurate, and reliable socio-economic and demographic data about the U.S. population. Our members are committed to enhancing official statistics that are trusted, reliable, and comparable for every community in the nation. They are especially devoted to ensuring the integrity of the decennial census, which is the denominator or foundation of every survey that is conducted in the public and private sectors.

While members of The Census Project have submitted a wide range of comments focusing on various aspects of the proposal, they agree that the rule would unravel centuries of standard practices that have defined decennial census operations and undermine the quality and accuracy of its data. That is because, among other things, the rule would redefine who is counted (and where) and remove race and ethnicity questions, which have been asked in some form on every census since the first one in 1790. Further, the rule would establish a 3-month window, rather than using April 1, Census Day, as the criterion for determining usual residence, along with potentially-complicated math on the part of respondents. Changes of this magnitude have the potential to drastically alter how the 2030 Census is conducted as well as its outcome, which is directly linked to how seats in the U.S. House of Representatives are apportioned and over \$2 trillion in annual federal funding is allocated.

We stand with our members in urging the Census Bureau to reconsider the proposed rule. While we appreciate the extended comment period, it is still insufficient given the rule's potential consequences. The proposed changes would fundamentally change the nature of the nation's decennial census and, therefore, it deserves more thoughtful, robust consideration.

Thank you for considering our views as you review the overwhelming number of public comments that members of The Census Project and other concerned individuals and organizations have submitted in response to the proposed rule.

Sincerely,

A handwritten signature in cursive script, reading "Mary Jo H. Mitchell".

Mary Jo H. Mitchell
Census Project Co-Director

A handwritten signature in cursive script, reading "Howard Fienberg".

Howard Fienberg
Census Project Co-Director