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October 28, 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:

Proposed & Untested Changes to 2030 Census Residence Rule Risk the Accuracy of the Count

The decennial census succeeds only when the public understands the rules, trusts the process, and can answer a straightforward question: Where does each person usually live?

Since 1790, the decennial census has defined residence as the place where a person lives and sleeps most of the time as of Census Day (since 1930 Census Day has been April 1). Consistent with this principle, small changes have been introduced over the decades to address changing living conditions to help respondents answer this straightforward question.

For 2030, the Department of Commerce published a [Federal Register Notice](#) proposing to define usual residence as the place where a person “lawfully spent the greatest number of days” during an “census enumeration period” between January 3 and Census Day, April 1. In addition, they add a requirement that a person’s usual residence should be consistent with, and evidenced by, federal tax records such as income-tax returns, W-2s, and 1099s.

As former directors of the U.S. Census Bureau, serving under administrations of both parties, we are concerned that this approach is likely to make the count less accurate, not more. The proposal will complicate what the Constitution calls for: an “actual Enumeration.” That obligation should be carried out with residence rules that reflect a readily understood concept of where and how people actually live, which has been thoroughly researched and tested, and can be administered consistently across the country.

To be sure, many people live in multiple residences during the proposed residence window, for example college students, gig workers, snowbirds, and movers. These groups have always been more difficult to count, and adding additional ambiguity will increase those challenges. In addition, respondents may encounter difficulty comprehending when residence of “greatest number of days” differs from the one “evidenced by their tax records,” which will surely occur when enumerating college students and snowbirds.

Tax records are valuable - but not a residence test

In 2020, administrative records, including tax data, helped the Census Bureau improve address lists, reduce unnecessary fieldwork, and resolve some non-responses. But a useful supporting record is an unreliable standard for deciding where **every** person should be counted.

Former Director of Statistics of Income at the Internal Revenue Service, Barry Johnson, recently [summarized](#) the shortcomings of using tax data in the decennial context. First, tax records do not cover everyone—especially children. Second, an address on a tax record is not always a home. It may be a post-office box, a business, a tax preparer’s office, or a military postal address. Tax records are designed to administer the tax system, not to determine a person’s usual residence. Third, the census and tax calendars do not line up. Taxpayers may file after Census Day, amend returns or request extensions until October. The Census Bureau must deliver state population totals for apportionment by December 31. In a 2020 administrative-record simulation, 3.7 million 2019 tax returns covering 5.2 million people were unavailable in time to produce state-level estimates by that deadline. Finally, matching records is not foolproof. Census linkage systems are sophisticated, but a 2023 [report](#) could not link nearly 6 million IRS-provided records—about 2.7 percent—to its files.

Protect the census with evidence, testing and transparency

Tax records should be used, as they were in the 2020 Census, as one input among several—alongside census responses, field observations, postal information, and other well-evaluated administrative sources. Conflicting records should trigger further review, not the rejection of a census response.

Before changing foundational residence rules, the Department of Commerce should conduct end-to-end and operational testing; measure effects on coverage, duplication, and geographic allocation; publish the findings, and allow independent experts, stakeholders, and the public to evaluate the results. The Department should also explain how it would resolve conflicts, protect confidential tax information, and preserve clear, workable rules for complex living arrangements, including families sharing a home, auxiliary dwelling units, and renting of a portion of a home.

For more than two centuries, the usual residence concept has adapted to a changing nation while keeping its central purpose: count every person once, only once, and in the right place. Any revision should strengthen that objective. The proposed rule dramatically complicates the

collection of complete, accurate data, and puts the 2030 Decennial at risk. This, in addition to proposed changes in content that depart from every U.S. Census conducted since 1790, leads us to strongly oppose all changes described in the Federal Register.

Thank you for considering our views.

Sincerely,

Dr. Ron Jarmin
U.S. Census Bureau Acting Director, 2025; 2021-22; 2017-2019

Dr. Robert L. Santos
U.S. Census Bureau Director, 2022-2025

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