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September 29, 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:

The Population Association of America (PAA) and Association of Population Centers (APC) welcome the opportunity to comment on the proposed rule, "Decennial Census of the Population of Americans: Proposed Residence Criteria and Proposed Regulations for Demographic Questions."

PAA is the premier professional scientific society representing more than 3,000 behavioral and social scientists, including demographers, sociologists, economists, epidemiologists, and statisticians who study the causes and consequences of population change. APC is an affiliated organization representing more than 40 federally supported population research centers based at U.S. institutions. PAA and APC members working in the public, private, nonprofit, and academic sectors rely on accurate decennial census data to conduct research and training, produce population estimates and projections, and design and analyze surveys.

Given the significant, foundational role decennial census data play in supporting the population sciences, PAA and APC strongly support preserving the integrity of the decennial census questionnaire and robust operations to ensure the most accurate enumeration of our nation's population. For a variety of reasons, we believe this proposed rule will undermine the overall conduct, quality, and accuracy of the 2030 Census and should be substantially revised.

Race and Ethnicity Questions in the Decennial Census

By proposing to eliminate race and ethnicity questions from the decennial census questionnaire, the proposed rule would upend centuries of standard practice. Some form of questions regarding race and ethnicity have been included in every census since 1790, and, over time, uses of these data have expanded to meet a variety of purposes. In the population sciences, race and ethnicity data are, for example, used to generate a representative survey sample, identify risk factors for diseases and disabilities, and understand how unique factors influence human development across the life course.

In addition to informing scientific research, race and ethnicity data are essential for understanding and meeting the needs of individual communities and constituencies. An array of federal, state, and local programs relies on these data to guide objective allocations of funding and design and deliver essential services. Even when the federal government chooses not to use a particular demographic measure for a specific program, states and localities may still require that information to understand and monitor their constituencies. Eliminating these measures from the decennial census would leave governments without a comparable source of complete population data across states and localities.

The rule states that one major motivation for removing the race and ethnicity questions is to reduce respondent burden. It is important to distinguish the decennial census from longer federal surveys. The decennial census uses an extremely short questionnaire. Consequently, the inclusion of race and ethnicity questions should not be viewed through the same lens as respondent-burden concerns associated with substantially longer surveys. The decennial census is mandatory, but historically the Census Bureau has not required respondents to answer every individual question, including questions about race and ethnicity, nor has mandatory response been routinely enforced. At the same time, responses to race and ethnicity questions, including write-in responses, demonstrate that respondents are willing and able to provide this information.

Finally, the rule specifically prohibits questions about sexual orientation on “the decennial census short-form questionnaire or any questionnaire used for purposes of the enumeration.” It is important to note that the decennial census has not historically included questions concerning sexual orientation or gender identity. Race and ethnicity measures therefore should be evaluated in the context of their longstanding role and demonstrated uses in the census rather than conflated with other demographic measures.

Consequences for the Broader Statistical System

As federal data users and proponents of the broader statistical system, our organizations note that adverse effects of removing race and ethnicity measures from the decennial census would extend well beyond the census itself.

Although the proposed rule exempts the American Community Survey (ACS) from certain restrictions on demographic measures, the ACS is a sample survey. Its estimates depend on accurate population benchmarks derived from the decennial census. Preserving demographic information in the ACS while removing corresponding information from the decennial census would therefore impair the statistical foundation needed to produce accurate demographic estimates.

The same issue applies throughout the broader federal, state, and local statistical systems. Numerous sample surveys rely on decennial population counts as benchmarks for weighting

and adjustment. Statistical procedures, including raking, have been used for decades to align survey samples with known population totals. These methods allow statistical agencies and researchers to reduce costs and respondent burden while continuing to produce representative estimates. If race and ethnicity benchmarks are no longer available from the decennial census, surveys will lose an important tool for assessing and correcting the representativeness of their race and ethnicity estimates. The consequence would therefore not be confined to one census question. It could diminish the accuracy and usefulness of demographic information produced by many other surveys.

The rule would permit the use of administrative records to supply race and ethnicity information. However, administrative records, while promising, are not currently an adequate substitute. Such records frequently lack this information, contain incomplete information, or rely upon race and ethnicity assigned or observed by a third party. Information recorded by an observer in a health care, education, or justice setting is fundamentally different from information provided directly by the individual and creates additional possibilities for measurement error.

Reliable self-reported demographic information is particularly important when government and the public seek to determine whether policies and institutions operate fairly. Even a policy intended to be "colorblind" cannot be objectively evaluated for disparate effects if accurate demographic data are unavailable. Publicly available, objective statistics allow people with different perspectives to evaluate outcomes using a common body of evidence. That transparency can strengthen confidence in both governmental decision making and the federal statistical system.

Proposed Residence Criteria

PAA and APC are also concerned about provisions in the proposed rule that would redefine "usual residence" and alter the enumeration period from January 3 to April 1 of each decennial year. If enacted, people with more than one home could be counted in their winter location rather than where typically live most of the year. On a larger scale, this proposal could lead to a gross misrepresentation of where people live most of the year, shifting populations from northern states to southern "snowbird" areas. Further, expanding the enumeration period to a 3-month window, rather than using April 1, Census Day, as the criterion for determining usual residence, has the potential to confuse respondents who are in transit between January 3 to April 1.

Consistent application of the residence criteria has inspired confidence that decennial census data are an accurate depiction of the American population. These revised definitions have the potential to undermine the trust that decennial census data users have in the overall enumeration.

Disclosure Avoidance

Finally, PAA and APC are also concerned about a provision in the rule that would restrict disclosure avoidance methods to coarsening and suppression.

The federal statistical system must protect respondent confidentiality while also preserving the accuracy and usefulness of the information it publishes. Restricting the tools available to statistical agencies would not necessarily improve either objective. Instead, extensive suppression or coarsening could substantially reduce the amount and detail of information available to the public and could delay its release. The Census Bureau's recent "indefinite delay" of the 2025 ACS 1-year estimates substantiates this claim.

Such limitations would have consequences well beyond academic research. Census data informs decisions made by officials in the public, private, and non-profit sectors. Reducing the timeliness, detail, or availability of census data would therefore diminish the return on the substantial public investment required to conduct the decennial census.

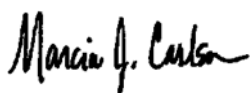
Conclusion

The decennial census is more than an enumeration of the nation's population. It provides the statistical foundation upon which much of the nation's public and private data infrastructure is built. Race and ethnicity data are integral to that foundation because they enable accurate survey estimates, support the evaluation and administration of public programs, and provide citizens with objective information to evaluate public policies.

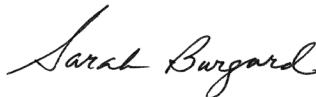
Our organizations, therefore, urge that any final rule preserve the collection of race and ethnicity information in the decennial census, restore coherent residence rules, and avoid restrictions that would unnecessarily limit the Census Bureau's ability to use appropriate disclosure avoidance methods. Protecting confidentiality, minimizing respondent burden, and maintaining objective and useful demographic statistics are complementary goals that the decennial census should continue to uphold. We urge the Census Bureau to maintain the standards that have defined the constitutionally mandated U.S. decennial census for centuries and substantially revise this proposed rule.

Thank you for considering our comments.

Sincerely,



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2026 PAA President



Dr. Sarah Burgard
2025-2026 APC President