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October 13, 2026

U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Re: **Docket USBC-2026-0628, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions**

To the Census Bureau:

The National Association of Regional Councils (NARC) appreciates the opportunity to provide comments on the Census Bureau's proposed rule for the Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket USBC-2026-0628).

NARC serves as the national voice for regional councils and believes regional cooperation is an effective approach to addressing planning and service delivery needs for infrastructure, economic development, public safety, the natural environment, aging in place, and more. For 60 years, NARC has represented regional organizations before Congress and federal agencies and promoted collaboration among governments and stakeholders across the United States.

Regional councils—also known as councils of governments, regional planning organizations, and similar entities—are public organizations that undertake intergovernmental cooperation across municipal, county, and state boundaries and help communities address challenges that extend beyond individual jurisdictions. Governed by a locally elected board of directors, regional councils convene elected officials and local leaders to develop shared solutions to regional problems, coordinate investments, plan for future growth, and improve efficiency of public services. Many regional councils serve federally designated functions, including Metropolitan Planning Organizations (MPOs), Area Agencies on Aging (AAAs), Economic Development Districts (EDDs), Workforce Development Boards (WDBs), public safety and emergency communications systems, and other federally supported programs.

Regional councils accomplish their goals through planning and service delivery, which rely on accurate demographic data to undertake the analyses necessary to develop effective plans and to organize the proper logistics for service delivery needs. These data serve as the foundation for transportation, housing, economic development, environmental, aging, and public safety planning. They enable regional councils to assess current conditions, identify emerging needs,

and make informed investment decisions. Accurate demographic information is also essential to allocating resources efficiently, targeting services to underserved populations, and ensuring that programs are delivered where they are needed most. In sum, reliable census data are essential to regional councils' planning, service delivery, and long-term investment decisions.

NARC appreciates the Census Bureau's efforts to follow its constitutional mandates, improve the decennial census data, and promote efficiency, and provides comments below on each of the efforts outlined.

**Usual Residence**

**NARC recommends preserving the existing protocol of using April 1 as the "usual residence" for the purposes of the 2030 decennial census.** We appreciate the Census Bureau's effort to improve the decennial census data by counting everyone once, only once, and in the right place. In the proposed rule, the Census Bureau proposes to count "usual residence" through the use of an enumeration period between January 3 and April 1 of the decennial census year. Based on the information currently available, additional testing and evaluation may be warranted before implementation in the 2030 Census.

Through past testing and analysis, the Census Bureau has developed and refined protocols for how to count college students, people experiencing homelessness, people in transitory living situations, young children, and more, in conjunction with the "usual residence" criteria of April 1st. These protocols represent the best methodology to date for counting the population. Introducing a three-month enumeration period counter to the current guidance on these and other situations could create confusion for census workers and contribute to inaccuracies. The Census Bureau is currently undertaking census tests at two locations in the country; introducing this modification after the testing period limits the ability to assess its effectiveness or accuracy prior to implementation. Therefore, NARC recommends preserving the definition of "usual residence" as April 1, until more rigorous testing of a January 3–April 1 period can verify its accuracy and effectiveness.

**Citizenship**

**NARC recommends preserving the current protocols for counting "whole persons" and continuing to include all persons who are not citizens or legal permanent residents, or provide an alternative dataset that includes this information**. The Census Bureau proposes to restrict the census to count only citizens of the United States living in the country, legal permanent residents, and some overseas military and federal government personnel. Restricting the census in this manner would severely undercount the total U.S. population and negatively impact the ability of regions and local governments to continue to serve their communities.

Restricting the census population count to the proposed definitions does not count foreign residents who are here living in the United States on student visas, work visas, approved asylum seekers, people with Temporary Protected Status, and more. While the Bureau proposes to count many of these residents using administrative records, significant challenges arise from inaccuracies between records, leading to the omission of residents, and the methodology to "clean" the records has not been thoroughly tested by the Census Bureau. Using administrative records would not be as accurate as counting all residents on the census, and therefore would not improve the accuracy, data, or efficiency of the census as stated in the goals of the proposed rule.

Furthermore, while we appreciate that the proposed rule would only be applied to the count for the census for the purpose of congressional apportionment, and not other statistical products such as the American Community Survey (ACS), it would affect other products because the census is the baseline the ACS is run against for computation. The census establishes the total population of the United States, and the total population is what the ACS compares against to ensure that its calculations are providing an accurate depiction of the nation based on the smaller sample size results of its survey. Ensuring an accurate count from the census using actual census responses remains critically important.

In addition, regions and local governments rely on federal programs that are determined and governed by accurate population counts, and changing who is counted in the census would greatly impact their ability to serve their communities. For example, Community Development Block Grant funding is calculated based on a population formula; under- or overcounting could drastically change the amount of funding that communities receive. This is also the case for certain programs for Area Agencies on Aging, economic development, USDA Rural Development, and more.

Similarly, Metropolitan Planning Organizations are designated by the Federal Highway Administration based on population counts in an urbanized area of 50,000 people or more, and Transportation Management Areas are defined as populations of 200,000 or more. Being designated or *not* designated as an MPO or a TMA resulting from inaccurate population counts changes the level of federal requirements and financial support.

Moreover, problems stemming from the use of less accurate administrative data are especially acute in transportation planning, a significant area of work for most regional councils. A strong economy requires a strong transportation system to move people and goods. Transportation planning requires accurate population data that aligns closely with actual conditions on the ground. However, imprecise administrative population estimates would not fully reflect real-world travel demand or congestion. Therefore, it is essential for transportation planners to have accurate population numbers to address the transportation needs of their region.

Finally, counting only citizens, legal permanent residents (green card holders), and certain overseas military and federal government personnel may invite constitutional and legal challenges based on the Fourteenth Amendment's understanding of whole persons. This legal challenge may delay or overturn a census conducted using the proposed definitions, causing costly delays to projects that rely on the information to proceed.

**Proposed Restrictions on the Inclusion of Certain Demographic Questions in the Decennial Census Operation**

**NARC recommends preserving and continuing the availability of demographic information related to race, ethnicity, and sexual orientation.** We are concerned that the lack of accurate demographic data will reduce a region's ability to comply with civil rights laws, and to enhance the economic growth and quality of life in their regions.

While we appreciate that the ACS addresses this information, similar to the population count, it does not replace a complete decennial census, which provides a foundational population benchmark to compare the ACS against. Therefore, complete demographic information outside of the ACS is still needed.

In addition, because regional councils accept federal funding for a variety of programs, they are subject to federal civil rights requirements, and rely on certain demographic information to ensure they are in compliance with those requirements. Eliminating this question from the census would place them at risk of being out of compliance with few or costly alternatives to obtain the data and remain in compliance.

Furthermore, eliminating demographic questions reduces the ability of regional councils to enhance their regional economic growth. Businesses rely on demographic data when deciding where to locate—whether that means retail operations, industrial facilities, or corporate offices. Many regional councils engage in economic development work: they produce Comprehensive Economic Development Strategies (CEDS) and attract businesses by demonstrating that they have the workforce or consumer base to support the new business growth. Understanding demographic data—what the current workforce looks like, what upskilling they may need—is essential to attract new businesses and successfully grow a regional economy.

**Decennial Census Proposal**

NARC appreciates the opportunity to comment on the Census Bureau's proposed rule and recognizes the importance of ensuring the decennial census remains accurate, reliable, and effective in fulfilling its constitutional and statutory purposes. Accurate population and

demographic data are essential for regional councils, local governments, and federal agencies to plan infrastructure investments, deliver services, support economic development, comply with civil rights requirements, and allocate resources fairly.

For the reasons outlined above, NARC recommends that the Census Bureau maintain the existing April 1 usual residence standard, continue counting all persons residing in the United States regardless of citizenship status, and preserve the current demographic questions proposed for elimination. These longstanding practices provide the most reliable foundation for producing accurate census data and ensuring that regions and communities have the information necessary to serve their residents effectively.

Thank you for your consideration of these comments. NARC looks forward to continuing to work with the Census Bureau to support a complete and accurate 2030 Decennial Census.

Sincerely,

Erich Zimmermann
Executive Director
National Association of Regional Councils