Schuyler Center for Analysis and Advocacy

Submitted electronically

October 29, 2026

Census Bureau
U.S. Department of Commerce
Washington, DC 20230

Re: Docket No. 260903-0005, Document 2026-18481

To Whom It May Concern:

Thank you for the opportunity to provide comments on the proposal to revise several parts of the Decennial Census.

On behalf of the Schuyler Center for Analysis and Advocacy, I am writing to comment on the proposed rule "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions" (Docket No. 260903-0005, Document 2026-18481, published September 10, 2026). We strongly oppose the proposed changes to the residence criteria and demographic items for the 2030 Census.

The Schuyler Center is based in Albany, NY, and is a 154-year-old statewide, nonprofit organization dedicated to policy analysis and advocacy in support of public systems that meet the needs of New York's children and families. Schuyler Center works to improve health, welfare, and human services for all New Yorkers, with a focus on preventing families from enduring hardships like ill-health, economic insecurity, child welfare involvement, or encounters with juvenile justice. We achieve our goals through detailed data and policy analysis, coalition building, and advocacy with elected officials, agency executives, policymakers, and stakeholders.

Our work relies on the availability of reliable data about our communities that can demonstrate widespread challenges, effective solutions, and where policy is falling short. A fair and accurate census is a cornerstone of our democracy. Since our nation's founding, the Decennial Census has been used to collect information about the country's population, helping us understand the demographic and geographic makeup of our country and communities. This information is non-political and critical to the work done by governments across the nation to develop and deliver public programs that meet the needs of their communities.

We urge the Census Bureau to further extend the comment period until December 10, 2026. The extension to November 2, 2026 is welcome, but significant regulatory actions such as this deserve a full 90 days for the public to review and respond.

We are concerned about and opposed to part 60 and part 70. We urge the Census Bureau to withdraw the proposed rule and return with substantial revisions, including:

- **Abandon any criteria that would exclude U.S. residents**, including visa-holders, refugees, asylum seekers, and others from the apportionment count. The purpose of the census is to count all people.
- **Reestablish guidelines for detailed residence situations that encompass the varied living arrangements** present in the United States such as for people who have recently moved, people in temporary shelters, and children in foster care.
- **Eliminate or substantially revise guidelines for the "enumeration period"** so that people (including seasonal workers and recent movers) are counted in the right place on Census Day and so that people (such as children in foster care and people in emergency shelters) are not accidentally excluded from the count.
- **Count incarcerated people at their home rather than their facility.** Incarceration is intended to be temporary. The current proposal shifts population toward the districts where prisons are built and away from communities where people live.
- **Eliminate the ban on demographic questions.** The U.S. has asked about race in every census since our first in 1790. Information on race and ethnicity is critical for public health and civil rights enforcement and should not be banned. Instead, questions on race and ethnicity should be brought into compliance with the 2024 SPD 15 standards. Similarly, sexual orientation, while not currently asked in the census, should not be barred from future censuses. The rule would bar the future collection of sexual orientation data and could restrict the collection of decennial census data on same-sex couples.

The proposed rule would undermine the census' ability to provide an accurate count of the American public. If implemented, the rule would also significantly impact the accuracy of the country's population-level data, resulting in a loss of understanding of the true size and make-up of the residents of the United States. This concern is noted in the Preliminary Regulatory Impact Analysis (PRIA):

"The **accuracy of ACS total-population estimates may decline because the ACS will not have an updated full count of the U.S. population.** Between censuses, the Census Bureau creates intercensal population estimates and revises them when new decennial census data become available. The ACS relies on those intercensal estimates to generate its sampling weights. **Without new decennial census data to recalibrate those estimates, the ACS sampling weights, and therefore its population estimates, will become less reliable.**"

Demographic data helps us identify problems, understand needs, develop solutions, and determine whether those solutions are working. Without accurate demographic data, local governments, schools, policymakers, service providers, and community-based organizations

will lack critical information to plan effectively and inform their work. As written, the proposed rule would exclude residents, result in an inaccurate count, and prohibit collection of important data on the characteristics of our population. Such outcomes are unacceptable and would harm all Americans.

We appreciate your consideration of our views on the integrity of the Census. Thank you for the opportunity to provide comments, and we look forward to continuing our engagement to ensure a successful 2030 Census.

Sincerely,

Schuyler Center for Analysis & Advocacy
Albany, NY