AMERICAN STATISTICAL ASSOCIATION
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ASA Response to the Proposed Rule from the U.S. Census Bureau: Decennial Census of the Population of Americans

October 31, 2026

The American Statistical Association appreciates the opportunity to comment on the September 10, 2026, notice of proposed rulemaking (NPRM) by the U.S. Census Bureau, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions. The ASA is a nonpartisan scientific organization of 13,500 members that is particularly well situated to comment on the scientific methodology of census and survey data collections. Since our founding in 1839, the ASA has worked to support a complete and accurate census. Within its first years, the ASA petitioned for correction of errors in the 1840 Census, and its members helped shape the reforms Congress adopted for the 1850 Census.[1] ASA members have served with distinction on formal advisory bodies to the Census Bureau since 1918 and on panels of the Committee on National Statistics on census methods spanning almost 50 years. ASA has also organized panels to comment on census quality: the ASA Technical Panel on the Census Undercount issued its report in 1984; the ASA Task Force on 2020 Census Quality Indicators issued its final report in 2021. In fact, ASA's longstanding investment in censuses grew to be a commitment to the overall federal statistical system and its central role in a well-functioning society and government.

In keeping with that history, we urge the proposed rule be withdrawn in its entirety. Given the decennial census's constitutional role, its centrality to public and private decision making, and the extensive legal, operational, and quality record behind current practice, the burden must be on the Census Bureau to demonstrate, with the evidence professional statistical practice requires, that any proposed change meets long-standing legal, operational, quality, and utility requirements. The NPRM does not meet that burden. It offers no testing, no quantified

[1] Anderson, M. "ASA and Census … A Long and Productive Relationship." Amstat News, December 2016.

estimates of the proposed changes' effects on response, coverage, accuracy, or utility, and no plan for meeting the many needs the census now serves. The evidence that does exist indicates the changes would reduce the quality of the 2030 Census, degrade the population estimates and surveys that depend on it for the decade that follows, and undermine the Census Bureau's ability to meet its obligations under federal information law: to produce relevant, timely, credible, accurate, and objective statistics, with quality and utility secured at every stage from design and collection through dissemination.

Specifically, we object to the following provisions:

- **Restricting the apportionment population (Part 60, § 60.4).** The Constitution calls for counting "the whole number of persons in each State," and every census since 1790 has included noncitizen residents. A departure of that magnitude carries a heavy burden, which the NPRM does not attempt to meet. The NPRM does not assess how determining legal status, whether through new questions or administrative records, would affect public participation, coverage, and accuracy for the count as a whole. Indeed, the latest Census Bureau research on adding a citizenship question found that self-response rates are affected, especially for households including noncitizens, and that the effects would be uneven across communities.
- **Redefining usual residence (Part 60, § 60.2).** Replacing the long-standing April 1 standard with where a person "lawfully spent the greatest number of days" during a "census enumeration period" of Jan. 3 to April 1 would tend to count people where they were during one part of the year rather than where they usually live, and could place people who divide their time between residences or move during that period in the wrong location. The change lacks scientific justification and has not been tested.
- **Use of Federal Tax Information as Evidence for Residence (§ 60.2(a)).** The Census Bureau has long used federal tax information to improve coverage, including in the 2020 Census, but the NPRM proposes a new reliance on tax data to determine residence. Tax records do not cover everyone, often carry outdated or nonresidential addresses, and follow a calendar that does not align with census operations, which could lead to counting people in the wrong place. Resolving discrepancies between questionnaire responses and tax records would be challenging, inviting inconsistent counts.
- **Prohibiting questions on race, ethnicity, and sexual orientation and restricting Publication of Demographic Data. (Part 70, §§ 70.2 and 70.3(b)).** The decennial census is the nation's most authoritative source of race data, collected since 1790 and Hispanic origin data, collected from all households since 1980. Eliminating these questions from any enumeration questionnaire would degrade the annual population estimates and, through them, the weighting of nearly every federal and private population survey, including the American Community Survey. It would also weaken Voting Rights Act enforcement and the measurement of census undercounts. The Census Bureau's own Preliminary Regulatory Impact Analysis acknowledges the loss of accuracy. Section 70.3(b) would further restrict publication of demographic data whose protection requires introducing uncertainty into national or state counts, removing tools needed to balance confidentiality and accuracy. The NPRM cites respondent burden

without evidence and without weighing it against the data's utility, and no alternative source can replace these data for small areas and population groups.

Even apart from the absence of justification for these changes, their adoption would destabilize preparations for the 2030 Census at a critical point. Large-scale data collections should not change their instrumentation or core definitions without adequate time to test and evaluate the effects. With less than four years until Census Day and likely litigation on these changes, that time does not exist, and untested changes to who is counted, where, and with which questions would put census operations, outreach, and data products at risk. For all of these reasons along with the outsized importance of the decennial census data to our country and federal data infrastructure, as explained below, the ASA emphatically urges the Census Bureau to withdraw the proposed rule in its entirety.

Below, we describe the standards that govern changes to the decennial census and then address each provision in turn.

Standards That Govern Changes to the Decennial Census

Taken together, the Constitution, Title 13 of the U.S. Code, federal information law, and regulations require that the quality, utility, burden, and confidentiality of census information be addressed at every stage, from design and collection through processing and dissemination. Professional statistical practice bolsters these requirements. Statistics cannot be disseminated with fidelity at the end of that process if quality was not built in at the start.

In addition to determining the apportionment of the U.S. House of Representatives, the decennial census underpins redistricting in every state. It is also the foundation of the nation's statistical infrastructure, which, in turn, provides estimates that help guide the distribution of trillions in federal funds every year (e.g., $2.8 trillion in fiscal year 2021), support public and private decision making, and anchor the population estimates and survey weights on which nearly all federal, state, local, academic, and private-sector population statistics depend. Current census practice rests on decades of testing, evaluation, and quality measurement, and on a long record of legal and operational precedent. Given the importance of the census results, the burden must be on the Census Bureau to demonstrate that any proposed change will meet long-standing legal, operational, quality, and utility requirements before it is adopted.

These obligations begin at collection. The Paperwork Reduction Act (PRA, 44 U.S.C. chapter 35) requires that federal information collections be necessary for the proper performance of agency functions and have practical utility, and that agencies reduce burden to the extent practicable and appropriate in light of that purpose. The NPRM cites burden as a reason to prohibit questions on race, ethnicity, and sexual orientation, but the available evidence indicates that the public does not perceive these questions as burdensome.[2] Moreover, the law requires

[2] Bogen, K. (1996): The Effect of Questionnaire Length on Response Rates-- A Review of the Literature. U.S. Census Bureau. Proceedings of the 1996 Joint Statistical Meetings. Moreover, demographic questions, including race and ethnicity, have low missing rates compared with other questions indicating that they are not perceived as unduly burdensome or sensitive. Using the ACS as an example, the basic

weighing burden against utility, which the NPRM does not do. By proposing to prohibit these questions through regulation, Part 70 would also foreclose the evaluation of need and utility the PRA requires when the census questionnaire is submitted for review.

The Foundations for Evidence-Based Policymaking Act of 2018 requires statistical agencies to produce relevant and timely statistical information, to conduct credible, accurate, and objective statistical activities, and to protect the confidentiality of the information respondents provide (44 U.S.C. 3563). The act defines statistical activities to include the collection, compilation, processing, and analysis of data (44 U.S.C. 3561), so these responsibilities govern decisions about what the census collects and from whom, not only how results are published. The act also requires the head of each parent agency to enable, support, and facilitate those responsibilities. OMB's 2024 implementing regulation, Fundamental Responsibilities of Recognized Statistical Agencies and Units (5 CFR Part 1321), sets out how statistical agencies and their parent departments must carry out these responsibilities, including the Department of Commerce in its oversight of the Census Bureau.

The Information Quality Act directs OMB to issue guidance to federal agencies for "ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information)" that they disseminate. OMB's 2002 guidelines direct agencies to treat information quality "as integral to every step of an agency's development of information," including its creation and collection. OMB's 2019 update establishes "fitness for purpose" as the touchstone for quality and states that "information destined for a higher-impact purpose must be held to higher standards of quality." By any measure, the decennial census is the highest-impact information the federal government produces. Because the act's remedies apply after information is disseminated, quality must be secured before collection begins.

These obligations also require balance. Statistical agencies routinely weigh confidentiality protection against accuracy and utility, and they make those tradeoffs on the basis of evidence. The NPRM considers individual factors, such as respondent burden and disclosure risk, in isolation, without weighing them against the immense losses in accuracy and utility the proposed changes would cause.

The NPRM also raises constitutional and legal questions, including whether excluding noncitizen residents is consistent with the Constitution's requirement to count "the whole number of persons in each State." We leave those questions to other commenters and focus on those within the ASA's expertise: whether the proposed changes would allow the Census Bureau to produce census information of the quality and utility these laws require.

The NPRM does not meet the requirements of these laws, and the burden of demonstrating that it does rests with the Census Bureau. For that reason alone, the rule should be withdrawn. It fails to carefully define and address important statistical aspects of the problem, and it offers none of the testing and analysis that have long supported Census Bureau decisions and on

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demographic questions had item imputation rates of 1.5% or less in 2024 (Item Allocation Rates | American Community Survey | U.S. Census Bureau).

which courts have generally relied in deferring to the agency. The cost of skipping that work is documented: In 1970, a Hispanic origin question added late in census planning performed poorly and hundreds of thousands of people who were not Hispanic were classified as Central or South American.[3] That question was asked of only a 5% sample; the changes proposed here would affect the entire count.

Moreover, the evidence that does exist indicates that the proposed changes would harm the census. As detailed below, each of the proposed changes would reduce the accuracy, relevance, or credibility of the 2030 Census.

§ 60.4: Restricting the Apportionment Population

We urge the Census Bureau to withdraw § 60.4 because the methods it would require to determine legal status have not been developed or tested, and the available evidence indicates that applying them would reduce the accuracy of the census as a whole, not only the apportionment counts.

Section 60.4 would count only U.S. citizens and lawful permanent residents for apportionment and exclude all other foreign citizens. The Constitution calls for apportionment based on "the whole number of persons in each State," and every census since 1790 has included noncitizen residents. A departure of that magnitude carries a heavy burden. The NPRM does not attempt to meet it. It identifies two possible methods for determining legal status, questions on the enumeration questionnaire and administrative records, but does not assess either.

Questions on citizenship and legal status. Census Bureau research shows that a citizenship question alone depresses response unevenly. Analyzing a randomized 2019 test with linked administrative records, Brown and Heggeness (2024) found that the question reduced response most for households with noncitizens ineligible for a Social Security number, and more for households with Latin American-born immigrants than for others. The losses came not only through lower self-response but also through omissions from household rosters and online break-offs, and the question increased the undercount of households with noncitizens. Such nonresponse could lead to citizens and lawful permanent residents in mixed-status households being undercounted. A question on legal status, which § 60.4 would effectively require, is likely to intensify these effects. Indeed, the ACS citizenship-status question has an allocation rate of about 10%.

Administrative records. Census Bureau analysis in 2018 found administrative records to be a better source of citizenship data than a census question, but that analysis concerned citizenship, not legal status.[4] Determining the legal status of noncitizens is a different and harder problem; no integrated set of records captures current status, and the Bureau has not evaluated

[3] Jacob S. Siegel and Jeffrey S. Passel, Coverage of the Hispanic Population of the United States in the 1970 Census: A Methodological Analysis, Current Population Reports P23-82 (U.S. Census Bureau, 1979); Pew Research Center, "Census History: Counting Hispanics" (2010).
[4] John Abowd, "Technical Review of the Department of Justice Request to Add Citizenship Question to the 2020 Census," January 19, 2018.

linkage accuracy for this purpose. When Census Bureau researchers simulated the 2020 Census using 31 administrative and third-party files, they found an estimated 3 million fewer native-born Americans than the census itself counted (Brown, Cohen, Denoeux, et al., 2023). Public awareness that records are being used to determine legal status could also discourage response to the census itself.

Effects on the full count. These effects would not be confined to the apportionment base. Accuracy depends on self-response, which yields more complete information than any other mode of data collection. In 2020, self-response averaged about 54% in census tracts with the highest shares of Hispanic residents, compared with 76% in tracts with the highest shares of non-Hispanic White residents (NASEM, 2023), and the net undercount of Hispanic people rose from 1.54% in 2010 to 4.99% in 2020. Households with members who would not be counted for apportionment may fear responding or conclude that responding does not matter. The resulting omissions would degrade the counts used for redistricting, fund allocation, population estimates, and every other use of census data.

The Evidence Act requires the Census Bureau to conduct accurate and credible statistical activities and to protect the trust of the people who provide information. Section 60.4 would put each of those obligations at risk, and the NPRM offers no evidence that it would not.

§ 60.2: Redefining Usual Residence

We urge the Census Bureau to withdraw § 60.2 because the proposed residence standard lacks scientific justification, depends on records unsuited to the purpose, and would count people in the wrong places.

The census has long counted people at their usual residence, where they live and sleep most of the time, as of April 1 of the census year. Section 60.2 would change both the standard and the evidence for it: people would be counted where they "lawfully spent the greatest number of days" during a "census enumeration period" of Jan. 3 to April 1, a residence that "should be consistent with, and evidenced by, their tax records."

A three-month standard would misplace people. A count of days over three months measures where people were during one part of the year, not necessarily where they usually live. The people most likely to be counted in the wrong place are those whose living arrangements change during or around that period, such as retirees who move seasonally, seasonal workers, and people with unstable housing. Residence is already difficult for the census to determine correctly for these groups, and residence rules are among the most difficult elements of the census for respondents to apply even under the current standard (NASEM, 2006). The NPRM offers no testing or analysis of how many people the new standard would move, or where. Changing the residence concept would also break comparability with the 2020 Census and with the population estimates and surveys benchmarked to it.

Tax records are unsuited to determining residence. The Census Bureau has long used federal tax information to improve coverage, including in the 2020 Census, but § 60.2 would make tax

records the test of where people live. As Johnson (2026) summarizes, tax data "do not cover everyone; the addresses can be stale or nonresidential; and tax processing schedules do not align neatly with the 2030 Census calendar." Many adults are not required to file. For others, tax addresses differ from where they live as a matter of course. Service members are not required to change their legal residence for tax purposes when their duty station changes (50 U.S.C. 4001), so for many military personnel, tax records and actual residence will diverge by law. Resolving discrepancies between questionnaire responses and tax records would be challenging, inviting inconsistent counts.

The proposed standard would reduce the accuracy of the count, and the NPRM presents no testing or analysis to show otherwise.

§§ 70.2 and 70.3(b): Prohibiting Questions on Race, Ethnicity, and Sexual Orientation and Restricting Publication of Demographic Data

We urge the Census Bureau to withdraw §§ 70.2 and 70.3(b) because the census is the benchmark for nearly all race and ethnicity statistics in the United States, and eliminating these data would reduce the relevance, utility, and accuracy not only of the census but also of the population estimates and surveys, including the American Community Survey, that depend on it. The Census Bureau's own analysis acknowledges this loss of accuracy. Section 70.3(b) would compound it by restricting the publication of demographic data that require disclosure protection, and the NPRM's justifications for both provisions do not withstand scrutiny, individually or together.

Section 70.2 would prohibit questions on race, ethnicity, or sexual orientation on any questionnaire used to enumerate the population. Section 70.3(b) would bar the Census Bureau from publishing "any individual demographic data" where doing so "necessitates introducing uncertainty into the population count data, at either the national or the state level." The census has collected race data since 1790 and Hispanic origin data from all households since 1980 and Congress has repeatedly supported, and at times required, detailed race and ethnicity categories.[5]

The census anchors the nation's race and ethnicity statistics. The Census Bureau's Preliminary Regulatory Impact Analysis states that omitting race and ethnicity from the 2030 Census questionnaire "would require the development of estimates from a base population derived from outdated and/or less accurate data and would deteriorate the accuracy of the estimation method itself." Those population estimates in turn serve as the controls to which the American Community Survey, the Current Population Survey, and nearly all other federal, academic, and private population surveys are weighted. Weighting corrects for the uneven coverage every survey has. Before weighting, for example, the Current Population Survey covers about 95% of

[5] For example, Congress and Asian American and Pacific Islander communities opposed the Census Bureau's proposal to collapse detailed Asian and Pacific Islander categories for the 1990 Census, and in 2009 Congress required by appropriations language that the census retain "some other race" as a category (123 Stat. 3115; NASEM, 2023, p. 263, n. 5).

the White population ages 16 and older but only about 77% of the Black population (U.S. Census Bureau, CPS coverage ratios). Because unemployment rates differ by race, estimates not adjusted to accurate census-based controls could distort the headline monthly unemployment rate. Without census race and ethnicity data to anchor the population estimates, these controls would degrade over the decade, and with them the race and ethnicity estimates from every survey that depends on them. These data are needed to enforce the Voting Rights Act and other civil rights laws, and through the population estimates and the surveys weighted to them, they inform the allocation of federal funds, state and local decision making, and the administration of health, criminal justice, and other laws.

No other source can replace these data. The American Community Survey cannot substitute for the census in small areas. As of 2020, the median population of minor civil divisions, incorporated places, and American Indian tribal areas was about 800, 1,100, and 500 people, respectively,[6] and ACS estimates for such small areas carry large margins of error even when aggregated over five years. Administrative records cannot fill the gap either: tax records do not collect race or ethnicity, Social Security records contain little, and immigration records do not follow standard classifications. Moreover, the Census Bureau's own administrative-records composite for race and ethnicity draws on decennial census responses as an input (Noon, 2024), so eliminating census race and ethnicity data would also degrade statistics based on administrative records.

Coverage measurement would be compromised. The Post-Enumeration Survey measures how well the census counts each population group, and in 2020 it found significant net undercounts of Hispanic, Black, and American Indian (on-reservation) populations. Without race and ethnicity data on the census, the Census Bureau would be severely limited in measuring differential undercount, because census records themselves would carry no self-reported race or ethnicity, and Congress and the public could not reliably know the demographic characteristics of people the census missed or miscounted. Because a central purpose of the Post-Enumeration Survey and related evaluations is to guide improvements to the next census, including efforts to reduce undercounts, the prohibition would affect the accuracy and completeness of censuses well beyond 2030.

The NPRM's justifications do not withstand scrutiny.

- *Questionnaire length and response.* The NPRM asserts that "the more questions that are included on the decennial census questionnaire, the lower the overall response rate," but does not estimate the effect of removing two questions from an already short questionnaire. Its sources do not support that extrapolation. The response differences between the 1980–2000 short and long forms involved far longer questionnaires.[7] Research following the 1990 Census found that the shortest form tested did not improve response over a five-question form (Dillman et al., 1992). A Census Bureau review of the

[6] Citro, C. F., and Prevost, R. (2024, December). U.S. Political and Statistical Geography & Census Small-Area Statistics: A Primer.
[7] Cong. Rsch. Serv., R41532, The American Community Survey: Development, Implementation, and Issues for Congress (Dec. 19, 2014), n.11.

literature found the relationship between length and nonresponse "surprisingly weak and inconsistent" (Bogen, 1996). Race and ethnicity questions are not perceived as unduly burdensome. In the 2024 ACS, allocation rates were 1.5% for race and 0.8% for Hispanic origin, compared with about 10% for citizenship status. The Paperwork Reduction Act requires that burden be weighed against the practical utility of the information collected. The NPRM considers only burden.

- *Disclosure risk.* Additional demographic detail does increase disclosure risk, but the NPRM does not quantify that risk or weigh it against the loss of the data. Alternatives have been proposed, including reducing race and ethnicity detail for the smallest geographic areas (Potter and Salvo, 2024; O'Hara, Prevost, and Dick, 2021[8]). The NPRM does not weigh the disclosure risk that questions on citizenship and legal status would add. The NPRM would also restrict publication of demographic data whose protection requires introducing uncertainty into national or state counts (§ 70.3(b)), and it cites a Department of Commerce order prohibiting noise infusion (Department Administrative Order 216-26). Together these would remove tools the Census Bureau needs to balance confidentiality and accuracy, with no analysis of the consequences. The NPRM thus treats disclosure risk as a reason to eliminate data while removing tools that could manage that risk.
- *Litigation over 2020 disclosure avoidance.* The NPRM notes that the Census Bureau's 2020 disclosure avoidance methods were litigated but does not explain the relevance to race and ethnicity questions. Data users' objections centered on the newness of the methods and the lack of time to test and evaluate them (NASEM, 2023). Those concerns argue for adequate testing and consultation with data users, not for eliminating the data being protected. Differential privacy remains a rigorous and valuable tool, and the appropriate mix of disclosure protections depends on the intended uses of the data and should be determined through evidence and consultation.
- *Difficulty of measurement.* The NPRM cites "substantial doubts about the meaning, significance, and impact of attempting to categorize persons by race and ethnicity." Measuring race and ethnicity is challenging, but difficulty is not a scientific rationale for abandoning measurement. It is a reason for continued research and for periodic updates to OMB's Statistical Policy Directive No. 15, most recently revised in 2024.
- *Need and usefulness.* The NPRM asserts a "reduced need for or usefulness of this information" without substantiation. The uses described above, and Congress's long-standing support for detailed race and ethnicity data, demonstrate the opposite. The NPRM also cites respondents' legal obligation to answer census questions (13 U.S.C. 221), although the Census Bureau has rarely prosecuted nonrespondents and has never prosecuted anyone for failing to answer a particular question.

Sexual orientation. The census has never asked about sexual orientation, and the NPRM offers no evidence about the burden or disclosure risk such a question would pose. Prohibiting it by

[8] O'Hara, A., Prevost, R., and Dick, C. (2021, October 22). Letter to Ron Jarmin responding to September 16, 2021, request for Feedback on Proposed 2020 Census Data Products Beyond Redistricting. Massive Data Institute, Georgetown University.

regulation would foreclose in advance the evaluation of need, utility, and burden that any proposed question should receive.

Sections 70.2 and 70.3(b) would reduce the relevance, utility, and accuracy of census information and of the statistics that depend on it, and would remove tools the Census Bureau needs to protect confidentiality while preserving accuracy. The NPRM presents no evidence that would justify those losses.

Consequences for the Decennial Census and the Nation's Information Infrastructure

Beyond their effects on specific counts and characteristics, the proposed changes would weaken the 2030 Census as a whole and the statistical system that depends on it.

Public trust and response. A complete count depends on public willingness to respond, and trust in government is low. In 2025, only 17% of adults said they trust the federal government to do what is right just about always or most of the time (Pew Research Center, 2025). The public values good data for decision making, but trust in federal statistics is more fragile.[9] Changes that appear to determine who counts, or that remove long-standing questions without evidence, risk being seen as political rather than scientific. That perception would undermine the objectivity and credibility the Evidence Act requires, and it would depress response among the populations already hardest to count.

Operational readiness. The Census Bureau is preparing for 2030 with substantially fewer staff than in 2024, let alone the levels historically needed to plan and conduct a census (Pierson et al., 2026), and with major planned initiatives already under way, including expanded use of administrative records. The proposed rule would add work the current plan does not contemplate:

- developing and testing methods to determine legal status;
- redesigning residence rules and the operations that apply them;
- developing and vetting new confidentiality protections with data users;
- designing outreach to counter heightened public confusion and distrust.

This additional work would make it difficult for the Census Bureau, as required by 13 U.S.C. 141(f), to submit the 2030 Census topics to Congress by April 1, 2027, and the questions by April 1, 2028. Moreover, should the proposed rule go forward in whole or in part, litigation would most likely follow, and the Census Bureau would have to plan for several possible censuses. These demands on operational resources raise the risk of operational failures, delays, and a less accurate count.

[9] Results from the Census Bureau's Household Trends and Outlook Pulse Survey show this pattern across administrations in 2025 and 2026. We do not cite specific percentages because a March 2026 change in the survey's design affected the estimates.

The nation's information infrastructure. The census and the population estimates derived from it are the benchmark to which nearly every population survey is weighted and the denominator for nearly every population-based calculation in the United States. As discussed under §§ 70.2 and 70.3(b), they also guide how surveys are designed, including how samples are stratified and how surveys reach smaller population groups. This role extends well beyond the American Community Survey to surveys the Census Bureau conducts for other agencies, including the Current Population Survey with the Bureau of Labor Statistics, the National Crime Victimization Survey for the Bureau of Justice Statistics, and the National Health Interview Survey for the National Center for Health Statistics, as well as to academic, private, and polling surveys. Errors introduced by the proposed residence and apportionment changes, and the loss of race and ethnicity data, would propagate through all of these surveys for a decade or more.

The uses at stake. The census apportions the U.S. House of Representatives, guides redistricting in every state, and helped direct more than $2.8 trillion in federal funds in fiscal year 2021. Its reach extends much further:

- Decennial census and census-based estimates support enforcement of civil rights in voting, employment, housing, and jury selection.
- Federal agencies use them to plan, evaluate, and monitor programs. The Centers for Disease Control and Prevention, for example, relies on county-level estimates by age, sex, race, and ethnicity as denominators for disease rates.
- State and local governments use them for planning, emergency preparedness, and economic development.
- Businesses use them to locate facilities and serve customers.
- Researchers, journalists, educators, and the public rely on them to understand the nation and its communities.
- Developers and evaluators of artificial intelligence systems use them to assess model performance against population demographic benchmarks.

Each of these uses depends on an accurate, complete, and comparable census.

Conclusion

The decennial census is interwoven with the nation's democracy, governance, economy, and information infrastructure. The proposed rule would restrict the apportionment population, redefine where people are counted, and eliminate race and ethnicity data while restricting the tools used to protect them. It would do so without testing, without analysis of the effects, and without any plan for meeting the many needs an accurate census now serves. These changes lack scientific justification, and the available evidence indicates they would reduce the accuracy, relevance, and credibility of the 2030 Census and of the statistics that depend on it. The burden of demonstrating otherwise rests with the Census Bureau, and the NPRM does not meet it. The American Statistical Association urges the Census Bureau to withdraw the proposed rule in its entirety.