November 2, 2026

Mr. George M. Cook
Acting Director
U.S. Census Bureau, Department of Commerce
4600 Silver Hill Road
Washington, DC 20233

Submitted electronically via regulations.gov

USBC–2026–0628

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (91 Fed.Reg. 57524)

Dear Mr. Cook:

Catholic Charities USA (CCUSA) and Catholic Health Association (CHA) appreciate the opportunity to comment on the above-referenced proposed rule. CCUSA and CHA are concerned that the proposed rule, if finalized, will lead to an inaccurate count of the population of the United States and significantly reduce the accuracy, completeness, and usefulness of census data. These data are critical to the functioning of health care systems, nonprofit organizations, educational institutions, local governments, and countless community programs. They also inform the allocation of funding for programs that support individuals and families experiencing poverty. An inaccurate count would undermine the equitable distribution of resources critical to meeting basic community needs, including food and nutrition assistance, health care, housing, education, and disaster relief.

For members of the CCUSA and CHA networks, such disruptions in resource allocation would create significant challenges to serving vulnerable populations in communities throughout the nation and certain U.S. territories. Ensuring an accurate census count is essential to maintaining the critical services provided by CCUSA and CHA members that are relied on by millions of Americans.

Catholic Charities USA

CCUSA is a national membership organization representing 170 independent Catholic Charities agencies and is one of the largest charitable networks in the country. These agencies operate more than 3,500 service locations across all 50 states, the District of Columbia, and five U.S. territories. Together, Catholic Charities agencies provide a wide variety of critical services, including food and nutrition support, pregnancy support services, emergency rental and utility assistance, rapid housing support, and housing counseling. Last year alone, this diverse network of programs reached nearly 16 million people.

In Chapter 25 of the Gospel according to Matthew, Christ calls us to witness to the poor with compassion and through acts of service and generosity. His teachings remind us that whatever we do for the least among us, we do for Christ.[1] We answer this call through corporal acts of mercy and advocacy, rooted in the principle that every person deserves the opportunity to participate fully in society and to live with dignity. Communities, and society, benefit when all share in and contribute to the common good; conversely, the deprivation and powerlessness of the poor injures not just those individuals, but communities and society as well.[2]

Catholic Health Association

CHA is the national leadership organization representing more than 2,200 Catholic health care systems, hospitals, long-term care facilities, sponsors, and related organizations. Our ministry is present in all 50 states and the District of Columbia, with one in every seven patients in the United States cared for in a Catholic hospital each year. As health care providers who directly serve patients with Medicaid, we know that Medicaid coverage is essential for people to be able to receive the medical care they need and to protect patients around the country.

CCUSA, CHA, and our members rely on a complete and accurate decennial census count to address poverty and health needs in local communities.

As the Census Bureau itself states, census data direct funds for services for people in poverty.[3] Census data underpin the formulas used to allocate hundreds of billions of dollars each year in federal and state funding for community priorities, including community development, health care, housing assistance, and education.[4] The scale of this funding is substantial: an estimated $2.24 trillion in annual federal funding distributed to state and local governments is informed by decennial census data.[5] Consequently, an inaccurate census count can have far-reaching effects on the resources available to communities.

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[1] "'The Church's love for the poor…is a part of her constant tradition.' This love is inspired by the Gospel of the Beatitudes, of the poverty of Jesus, and of his concern for the poor… 'Those who are oppressed by poverty are the object of a preferential love on the part of the Church which, since her origin and in spite of the failings of many of her members, has not ceased to work for their relief, defense, and liberation.'" (Catechism of the Catholic Church, nos. 2444, 2448, quoting *Centesimus annus*, no. 57, and *Libertatis conscientia*, no. 68).

[2] United States Conference of Catholic Bishops, *Economic Justice for All*, no. 88.

[3] U.S. Census Bureau, Report No. D-1280(RV), *2020 Census Complete Count Committee Guide* 14, https://www2.census.gov/programs-surveys/decennial/2020/partners/outreach-materials/toolkits-guides/complete-count-committee-guide.pdf.

[4] Dante Moreno, *A New Census Rule Could Reshape How Your Community Is Counted – Here's What to Know*, Nat'l League of Cities (Sept. 28, 2026), nlc.org.

[5] *U.S. Census*, Nat'l Council of Nonprofits, https://www.councilofnonprofits.org/us-census (last visited Oct. 21, 2026).

Put more directly, an incorrect count impacting resource allocation could potentially cost a state millions of dollars in federal funding over the decade between census counts.[6] Texas provides a useful illustration of scale. In Fiscal Year 2023, Texas received almost $153 billion in census-guided federal spending including $109.17 billion in Medicaid and Medicare spending, and $20.79 billion for other health-related spending including medical costs, nutritional support, social services, and community health centers.[7] When a state's population is undercounted, funding allocated through census-based formulas may not fully reflect the needs of its residents. In a state the size of Texas, even a small undercount can translate into the loss of millions, and potentially billions, of dollars that would otherwise support essential services for individuals and communities.

In practical terms, the overcount or undercount of a subgroup, like veterans or school children, can result in resources being allocated in ways that do not accurately reflect community needs.[8] Programs designed to serve those populations may therefore receive insufficient funding or support to effectively meet demand. For instance, at the federal level, the Health Resources and Services Administration relies on census derived data to identify medically underserved communities and areas with shortages of health professionals. The proposed changes would result in inaccurate population counts and affect these designations, even when a community's underlying need for care remains unchanged. Similarly, overcounts could affect program eligibility, particularly in rural communities. For example, an inflated population count could lead a rural community to be reclassified as urban, making it ineligible for programs and funding opportunities reserved for rural areas and reducing access to services tailored to the needs of rural residents.[9]

Members of the CCUSA network and CHA members are among the many nonprofits and community-based organizations that use federal funding allocated based on census data to deliver services to individuals, families, and communities across the country. CHA members rely on accurate census data to inform the required community health needs assessment to identify priority health needs. This information is then used to develop their community benefit and health improvement strategies (implementation strategies). Additionally, with multiple groups disregarded, it makes it difficult for CHA members to fully understand the needs of their community and who will be seeking care in their facilities.

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[6] *Census Matters: Why an Accurate Count Is Essential to Funding Our Communities,* Project On Gov't Oversight (Oct. 28, 2025), https://www.pogo.org/reports/census-matters-why-an-accurate-count-is-essential-to-funding-our-communities.

[7] *Census Matters: Census-Guided Funding in Texas*, Project On Gov't Oversight (2025), https://docs.pogo.org/report/2025/census-matters/2025-Census-Matters-Fact-Sheet-Texas.pdf.

[8] *Census Matters: Why an Accurate Count Is Essential to Funding Our Communities,* Project On Gov't Oversight (Oct. 28, 2025), https://www.pogo.org/reports/census-matters-why-an-accurate-count-is-essential-to-funding-our-communities.

[9] Research by the Project on Government Oversight shows that both large entitlement programs (e.g., Medicare, Medicaid, Supplemental Nutrition Assistance) and smaller more targeted programs use census data in their allocation of funds. Examples of smaller programs that use census data include Appalachian Local Development District Assistance, Rural Violent Crime Initiative, and the Resilient Food System Infrastructure program. *Census Matters: Why an Accurate Count Is Essential to Funding Our Communities,* Project On Gov't Oversight (Oct. 28, 2025), https://www.pogo.org/reports/census-matters-why-an-accurate-count-is-essential-to-funding-our-communities.

For healthcare organizations and social service agencies, the proposed changes could have even broader consequences. Census data and census-derived population estimates are used throughout government funding and planning processes, including programs related to Medicaid and CHIP funding, public health, maternal and child health, nutrition assistance, housing, transportation, and community development. An undercount of residents or a reduction in demographic data quality could affect resource allocation decisions, thereby limiting the ability of communities to demonstrate eligibility, need, and demand for essential services.

CCUSA and CHA are concerned that the proposed rule, if finalized, will lead to an inaccurate count of the population of the United States and significantly reduce the accuracy, completeness, and usefulness of census data.

In the notice of proposed rulemaking published on September 10, 2026, the Census Bureau proposes to add Part 60, which outlines criteria for determining each person's "usual residence," and Part 70, which establishes standards and restrictions for the inclusion of certain demographic questions. The stated purpose of these new parts is to "ensure fidelity to the Constitution, improve and protect the core decennial census data, and promote efficiency."[10] CCUSA and CHA are concerned that the proposed rule would undermine, rather than advance, these objectives, resulting in an inaccurate count of the US population, inaccurate information about vulnerable communities, and disruptions in resource allocation.

In the Census Bureau's own analysis, the proposed residence criteria are unlikely to achieve the goals identified in the NPRM and instead risk degrading the quality and accuracy of decennial census data.

Proposed section 60.2(a) defines "usual residence" as the residence where a person has lawfully spent the greatest number of days during the census enumeration period. The section also states that a person's usual residence should be consistent with, and evidenced by, their tax records.[11] This definition of usual residence is relied upon throughout Part 60.

The Preliminary Regulatory Impact Analysis (PRIA) published on regulations.gov recognizes the detrimental impact the proposed changes will have on the quality of data collected during the decennial census.[12] Considering the costs and benefits of the proposed residence criteria, the Census Bureau states that it "expects that the potential costs of the purposed rule arise from the absence of certain information that had previously been available from the decennial census."[13] They go on to

[10] Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, 91 Fed. Reg. 57524, 57524 (proposed Sept. 10, 2026) (to be codified at 15 C.F.R. pt. 60).
[11] *Id.* at 57529.
[12] We note that the PRIA does not consider the benefits and costs of the proposed rule to individuals living in the United States that would not be counted if this rule were to be finalized as proposed. Bureau of the Census, Preliminary Regulatory Impact Analysis (PRIA) 9–10 (Sept. 10, 2026), https://www.regulations.gov/document/USBC-2026-0628-0002.
[13] *Id.* at 11.

suggest that the American Community Survey (ACS) may be an "appropriate substitute" for this missing information. However, as the Census Bureau points out, the ACS does not provide the same level of detail as the decennial census, and further, ACS population estimates will become less reliable without decennial census data.[14]

Setting a "census enumeration period" from January 3 to April 1 of the census year is unprecedented and has the potential to result in the undercount of vulnerable people.[15] For instance, if a family is temporarily living in an emergency shelter as the result of poverty or domestic violence between January 3 and April 1, that shelter would be considered their usual residence for census purposes, not the apartment that they lived in for the preceding 9 months. Even worse, they may be accidentally excluded from the count.

Similarly, shifting residence determinations toward tax records and cross-agency administrative data has the potential to impact how renters, seasonal workers, and other mobile populations like families in emergency shelters and foster children are counted. This proposed language stating that a person's usual residence should be consistent with, and evidenced by, their tax records ignores the limitations of tax records. Tax records often reflect a mailing address (such as post office box, business address, or tax preparer's address) rather than a residential address and may be inconsistent with residence for many taxpayers, including for many military personnel and their families and people living in rural areas. Reliance on tax records also risks missing many dependent children in the count.

In addition, under section 60.4, people present in the country during the census who are not citizens or lawful permanent residents will not be counted. This would exclude visa-holders, refugees, asylum seekers, and others living here from the count, and result in an inaccurate count of the number of persons in each state.[16] The proposal acknowledges that, under the 2020 Census criteria, individuals who lived and slept in the United States most of the time were generally counted where they resided. The proposed change would depart from that longstanding approach and could result in the exclusion of millions of people who live, work, attend school, receive healthcare, and contribute to their local communities from population counts used for representation, planning, and the allocation of federal funding.

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[14] *Id.* at 12-13.

[15] Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, 91 Fed. Reg. 57524, 57526 (proposed Sept. 10, 2026) (to be codified at 15 C.F.R. pt. 60).

[16] We note the Constitutional mandate to "count[] the whole number of persons in each State." U.S. Const. amend. XIV, § 2.

In the Census Bureau's own analysis, the addition of the proposed standards and restrictions for the inclusion of certain demographic questions is unlikely to achieve the goals identified in the NPRM and instead risk degrading the quality and accuracy of decennial census data.

Information on race and ethnicity is critical for public health and civil rights enforcement and should not be excluded from the decennial census. In the NPRM, the Census Bureau claims that the restrictions on demographic questions in proposed Part 70 will only apply to the decennial short-form census or any questionnaire used for the purposes of enumeration.[17] While this is technically true, this framing is misleading. The decennial census data is foundational, informing many other surveys and datasets. Federal agencies, states, cities, universities, hospitals, and private researchers all rely on census totals to weight and check their own data. If race and ethnicity are removed from the census, it weakens the reliability of that information everywhere, at every level, in both public and private sectors.

Annual intercensal race and ethnicity estimates derived from decennial census data are used to calculate and analyze a wide range of critical indicators, including fertility, mortality, cancer incidence, unemployment, and labor force participation rates.[18] These data also inform state and federal grant programs and funding formulas that direct resources to communities across the country. In addition, they provide a statistical foundation for countless research projects conducted by academic institutions, government agencies, and private organizations. Eliminating these questions would impair researchers' and agencies' ability to measure and act upon disparities in coverage, access, and outcomes and target outreach and resources for at least the next decade. As the Census Bureau recognizes in the PRIA, "there are no comparably accurate, comprehensive, and reliable sources of this information."[19]

The decennial census is about ensuring that every community is seen, counted, and ultimately, represented. The proposed rule would make that goal more difficult to achieve by increasing the risk of undercounting vulnerable populations and reducing the availability of critical demographic information. The consequences would reverberate through the health care, housing, education, sectors, and disrupt the community services on which millions of people rely.

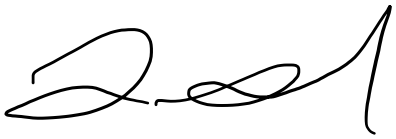
For these reasons, CCUSA and CHA urge the Census Bureau not to finalize the proposed rule and instead maintain census practices that support a complete, accurate, and equitable count of all persons living in the United States.

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[17] Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, 91 Fed. Reg. 57524, 57527 (proposed Sept. 10, 2026) (to be codified at 15 C.F.R. pt. 60).
[18] Bureau of the Census, Preliminary Regulatory Impact Analysis (PRIA) 15 (Sept. 10, 2026), https://www.regulations.gov/document/USBC-2026-0628-0002.
[19] *Id.*

Respectfully submitted,





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