INSTITUTE FOR WOMEN'S POLICY RESEARCH

A just future begins with bold ideas

November 2, 2026
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Office of the Under Secretary for Economic Affairs
4600 Silver Hill Road
Washington, DC 20233-3700

Submitted via regulations.gov.

Re: Opposition to the Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions

On behalf of the Institute for Women's Policy Research (IWPR), I am writing to provide comment opposing the US Census Bureau's proposed rule altering the residence criteria to exclude non-US citizens and eliminating demographic data collection related to race, ethnicity, and sexual orientation.

IWPR is a nonpartisan, nonprofit organization that conducts and disseminates research to shape policies that close structural gaps, improve the economic well-being of women and families from diverse backgrounds, and promote the full participation of working people in society. As a leading national think tank that routinely employs the highest standards of integrity and quality in our research, IWPR is uniquely positioned to comment on the harmful impacts the proposed rule will have on women's economic security and health, as well as on demographic data collection. The comments below discuss the harms these changes would create for the hundreds of programs whose funding allocation is determined by the Decennial Census. Additionally, this comment details the detrimental impact this proposed rule will have on data integrity more broadly.

IWPR strongly opposes and urges the withdrawal of the Census Bureau's proposed rule. Intentionally not collecting demographic data on non-US citizens, or on the race, ethnicity, and sexual orientation of US residents, and therefore suppressing the true composition of the people in this country, will have a devastating impact on access to critical federal and state government services and programs while threatening the data integrity of the Census Bureau.

Since 1790, the US Census Bureau has conducted the US Decennial Census to count US residents to apportion congressional representatives.[1] Centuries later, the US Decennial Census data is still utilized for this purpose, but it is also used to determine funding allocations for many federal government services and programs, which directly impact access to health care, housing, child care services and supports, and other federal and

state programs that are pivotal for US residents.[2] The proposed rule would significantly alter the availability and amount of federal funding by excluding non-citizens in the Decennial Census. Due to this exclusion, many states will have an undercount of residents, meaning they will qualify for less federal funding.[3] Additionally, excluding demographic data collection based on race, ethnicity, and sexual orientation will directly harm communities that are already undercounted and underrepresented in existing Decennial Census data."[4]

Intentionally Failing to Collect Available Decennial Census Data Harmfully Impacts Federal Funding Allocation for All Communities

Decennial Census data is used for a myriad of purposes, including guiding federal government funding distributions to state and local governments, nonprofit organizations, educational institutions, companies, and households.[5] During fiscal year (FY) 2021, 353 federal assistance programs used Decennial Census Programs data to distribute $2.8 trillion in funds.[6] Similarly, more recently, in FY 2023, 371 federal assistance programs utilized Decennial Census Programs data to geographically allocate funding.[7]

Census Bureau data, including the Decennial Census data, is used to allocate funds based on a range of variables, including, but not limited to, population, the economy, demographic makeup, and housing data.[8] For example, Title I Grants to Local Education Agencies are determined by several factors, including the number of children living below the federal poverty level, which is determined using Decennial Census data.[9] However, if there is a population miscount of that figure, it would greatly impact the funding sent to each locality.

This is why population undercounts, or not counting certain populations, can be detrimental to states, localities, and communities. If a population is undercounted, or not counted at all, the demographics and accuracy of the population will change, which could lead to fewer resources allocated to that population.[10] Several populations, including, but not limited to, young children under five years of age, racial and ethnic minorities, undocumented immigrants, LGBTQ+ people, and non-English speakers are historically undercounted.[11] In a study of the 2010 Census, researchers determined that if young children (under five years of age) had been undercounted by 1 percent more, it would have resulted in an $8.2 million decrease in Children's Health Insurance Program (CHIP) funding allocated to Texas and an almost $4.2 million decrease in CHIP funding allocated to Florida.[12] Undercounts can also lead to states not receiving their fair and accurate share of funds. A 2020 Decennial Census follow-up survey reflected that six states—Arkansas, Florida, Illinois, Mississippi, Tennessee, and Texas—all had significant undercounts of their population, which could impact the federal funds they received based on Census data.[13]

Intentionally excluding non-US citizens and not collecting demographic data based on race, ethnicity, and sexual orientation will lead to more miscounts and less funding for states that rely on these funding sources to support their constituents.

Intentionally Excluding Decennial Census Data Will Negatively Impact Women's Health

Several federal health care programs, including, but not limited to, Medicaid, the Maternal and Child Health Services Block Grant to the States, the Maternal, Infant and Early Childhood Home Visiting Grant (MIECHV), and the Maternal and Child Health Federal Consolidated Programs, rely on Decennial Census Programs data to direct funding.[14] Failing to accurately collect Decennial Census data will negatively impact health care for every person residing in the United States, especially women.

Medicaid supplies health care coverage to low-income children and adults and utilizes the Federal Medical Assistance Percentage, known as the "FMAP," to distribute funds to states.[15] The FMAP is calculated using state population data, which is determined by Decennial Census demographic and population data.[16] If a state's population figures are skewed because non-US citizens aren't counted, this will likely result in states receiving less funding for Medicaid, even if their populations haven't decreased.[17] Women make up the majority of adult Medicaid beneficiaries, meaning they will be disproportionately harmed by the proposed rule.[18] Additionally, Black and Latino populations, who already face significant disparities in accessing health care, will be even less protected if race and ethnicity demographic data are eliminated.[19]

The MIECHV Grant program provides funds to states, territories, and tribal entities to support young families through evidence-based home visits with social services, health, and child development professionals.[20] In FY 2024, MIECHV led to 990,000 home visits in all 50 states, the District of Columbia, and five US territories.[21] Studies show that MIECHV has positive impacts on maternal, child functioning, and family well-being outcomes.[22] MIECHV's total funding is based on several factors, including the number of children under five years old in each state, which is determined by Decennial Census data.[23] If children under five years old, a population already subject to miscounts, aren't accurately counted, states and territories will likely receive less MIECHV funding even though their community's needs haven't changed.[24] This will result in fewer mothers receiving breastfeeding support, mental health screenings, and postpartum care through MIECHV. A decrease in access to postpartum care and mental health screenings is particularly harmful for mothers, as maternal mental health disorders, such as postpartum depression, are a leading complication of childbirth, impacting 20 percent of US women.[25] A lack of proper treatment and support for maternal mental health can have devastating consequences, including overdose and suicide.[26] These consequences are particularly severe for Black women and other birthing people of color. Almost 40 percent of Black mothers will experience maternal mental health

conditions; they are more than twice as likely to experience such conditions as White women, but half as likely to receive care.[27]

Additionally, intentionally excluding Decennial Census data will negatively impact women's health, as they will likely be prevented from accessing domestic violence, sexual assault, and other crime victim services. Several federal programs, including Crime Victim Assistance, Violence Against Women Formula Grants, and many other violence prevention programs, utilize Decennial Census Programs data to distribute funding to states.[28] This could put women, and disproportionately Black, Latina, and Indigenous women and LGBTQ+ people, at risk of experiencing higher rates of gender-based violence.[29]

Intentionally Excluding Decennial Census Data Will Negatively Impact Access to Child Care

Intentionally suppressing Decennial Census data by not counting all US residents will harm families, especially pregnant women, mothers, and children. Programs like Head Start and the Child Care and Development Block Grant (CCDBG) utilize Decennial Census data to direct funding.[30] If Decennial Census data is inaccurate or incomplete, it's likely communities will receive less funding for these programs even if their populations remain the same.

Head Start, the largest public preschool program in the United States, provides services to low-income families to support school readiness and early childhood development for young children.[31] In FY 2025, Head Start served 771,121 children and pregnant women in various child care settings across the United States.[32] Unfortunately, thousands of children and families who benefit from Head Start will be negatively impacted if the proposed rule goes into effect. Head Start funding is determined by a congressional formula related to the number of people on public assistance, which utilizes Census Bureau data and the Decennial Census for accuracy.[33] Therefore, if the Decennial Census fails to accurately count US residents by undercounting non-US citizens, this will likely result in less funding allocated to Head Start. Cutting Head Start funding will severely impact low-income mothers, who rely on Head Start's program and services for affordable child care so they can work or attend school.[34] A decrease in funding will also harm pregnant women, who benefit from Head Start services like access to health care, food assistance, newborn visits, and prenatal and postpartum education and counseling.[35]

Similarly, CCDBG provides access to safe, quality child care for low-income families who are in the workforce or actively pursuing education or training courses.[36] CCDBG is the primary federal grant program providing child care to low-income families and allows them to save, on average, $19,368 annually on child care.[37] CCDBG is appropriated by Congress based on three components determined using Census

Bureau data, including the Decennial Census: the number of children under five years of age, the number of children eligible for free or reduced lunch, and per capita income.[38] If children aren't accurately counted or the per capita income figures are skewed because certain populations are missing from the data, it's likely there will be less CCDBG funding available, even though the number of children and families utilizing the program will remain the same. This creates a serious disadvantage for low-income families who are reliant on affordable, accessible child care to remain in the workforce or complete an educational degree. Women, especially women of color, will be disproportionately impacted by this change in funding as they are more likely to leave the workforce to provide unpaid caregiving when child care becomes unaffordable.[39]

Intentionally Excluding Decennial Census Data Will Negatively Impact Women's Economic Security

The proposed rule's failure to accurately count all US residents in the Decennial Census will gravely affect women's economic security. Federal programs and funding, like SNAP and unemployment insurance, allocate funding to states based on Decennial Census Programs data.[40] If Decennial Census data misrepresents the US population by intentionally suppressing undocumented residents as well as demographic data on race, ethnicity, and sexual orientation, it's likely critical programs will allocate less money to states based on skewed population data.
SNAP is the largest federal program addressing hunger and nutrition assistance in the United States, serving over 42.1 million participants monthly.[41] Millions of dollars in SNAP funding are distributed to states using Decennial Census Programs data.[42] Therefore, if Decennial Census data miscounts a population or intentionally misrepresents demographic data by failing to collect race, ethnicity, or sexual orientation data, it is likely to impact both where SNAP funding is distributed and how much funding is distributed. This would severely impact women, particularly women of color, people with disabilities, and LGBTQ+ people, as they tend to have higher rates of participation in SNAP.[43]

Unemployment insurance is a joint federal-state program that provides financial assistance to eligible unemployed workers.[44] Over a million people benefit from unemployment insurance on a weekly basis.[45] Funding for unemployment insurance is allocated to the states based, in part, on Decennial Census Programs data.[46] If states received less funding due to inaccurate population counts, this would particularly harm Black, Latina, and Indigenous women, as they experience higher rates of unemployment due to systemic barriers and discrimination.[47]

Lastly, the proposed rule could have catastrophic consequences for employment civil rights enforcement, which can directly impact women's economic security. Many federal agencies, such as the US Department of Labor and the Equal Employment Opportunity Commission (EEOC), rely on disaggregated data sets to determine

effective enforcement of civil rights protections.[48] This change would be particularly concerning in light of the EEOC's proposed rule to halt collecting workforce demographic data from employers.[49] Without disaggregated data reflecting the realities of local job markets, it will likely be harder to enforce civil rights claims.

A Complete and Accurate Decennial Census and Properly Functioning Census Bureau are Critical for Data Integrity

We are greatly concerned about the impact the proposed rule will have on accurate, complete, and trustworthy Census data. A significant number of public and private data sources, such as Nielsen and the Pew Research Center, rely on US Census data to provide the population weights and markers to perform their own data collection and research.[50] Several public data sources, including the American Community Survey, use Decennial Census data as their baseline for nationwide population and demographic information.[51] If the Decennial Census fails to provide an accurate count of all US residents, this will likely impact any public or private research relying on that data. Practically speaking, should this proposed rule go into effect, state governments, the private sector, and research organizations would not be able to supplement the missing federal data that would be lost without the common denominator the Decennial Census provides.[52]

The proposed rule cites issues related to confidentiality and privacy as one of the motivators for this change in collection of Census data.[53] Privacy and confidentiality are always important considerations when obtaining and handling sensitive information. It is abundantly clear, however, that the proposed rule far exceeds such considerations by instead effectively seeking to erase non-citizen residents and Black, Latina/o, Asian American, Native American, Alaska Native, and LGBTQ+ individuals from the nationwide data landscape by prohibiting demographic data collection. This will have catastrophic effects on the many systems, such as congressional apportionment and federal funding allocation, that rely on these figures.[54]

The proposed rule also claims this change seeks to make data "colorblind" to prevent distortion of data with "immaterial personal characteristics, such as race."[55] In reality, the proposed rule would have the opposite effect: By failing to count populations based on race, ethnicity, citizenship status, or sexual orientation, this administration would distort any measure of fairness or equity provided by Census data. For example, under the proposed rule, states and counties with high numbers of non-citizens, such as California, Florida, Massachusetts, New Jersey, New York, and Texas, would receive a smaller allocation of federal funds.[56] This will negatively impact every resident of those states regardless of immigration status, as there will be less funding for critical federal assistance programs like Medicaid, Medicare, SNAP, highway planning, housing assistance, and hundreds of other programs.[57] Intentionally suppressing race, ethnicity, sexual orientation, and non-citizen data doesn't erase those communities from existing.

Instead, it disadvantages all families and communities by creating an unfair and unreliable system for congressional representation and access to federal funding.

Additionally, the administration's previous actions to undermine the Census Bureau demonstrate its lack of intent to create fair data collection practices. In spring 2025, the US Secretary of Commerce took unprecedented steps in terminating the 2030 Census Advisory Committee, the Census Scientific Advisory Committee, and the National Advisory Committee on Racial, Ethnic, and Other Populations.[58] These external advisory committees were made up of multiple scientific, academic, and technical experts to provide non-partisan research, expertise, and feedback on proposed Census changes.[59] Eliminating any outside oversight into the Census process shows mal intent from this administration. Furthermore, the August 2026 release of an unauthored Census Bureau report on non-citizen voting, which has direct ties to the conservative America First Policy Institute, indicates the administration is prioritizing partisan viewpoints over accurate, reliable data collection.[60]

Conclusion

Our country relies on accurate, reliable, and complete Decennial Census data for every aspect of life, including, but not limited to, congressional representation, health care access, education access, workforce, unemployment insurance, highway infrastructure, emergency preparedness, and city planning.[61] This proposed rule would have catastrophic effects on a multitude of federal, state, and community programs by creating a system rooted in inequity and unfair representation. All US residents, but particularly women, especially women of color, LGBTQ+ people, and non-citizens will be harmed by this proposed rule. They deserve to be seen and counted in the Decennial Census. We strongly oppose this proposed rule and urge the US Census Bureau to withdraw it.

Sincerely,



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cc: Secretary Howard Lutnick, Department of Commerce

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