November 2, 2026

Daniel Sweeney
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce, Census Bureau
Washington, DC 20253

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (FR Doc. 2026-18481, RIN 0607-AA75)

Dear Mr. Sweeney:

The NC Budget & Tax Center appreciates the opportunity to comment on the proposed rule "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions" (Federal Register Notice Docket Number USBC-2026-0628, published September 10, 2026). We strongly oppose the proposed changes to residence criteria and demographic questions for the 2030 Census and urge the Census Bureau and Department of Commerce to reject these changes.

The NC Budget & Tax Center is a non-profit, non-partisan organization based in North Carolina. We document and analyze fiscal and economic conditions across the state and create tools and opportunities for people and organizations to work together to secure policies and public investments that improve economic opportunity and well-being. We believe that North Carolina can be a state where, no matter who you are or where you live, you can reach your full potential and that public investment is critical to that goal. We regularly rely on census data to produce research and tools that we and our partners rely on to understand economic conditions and well-being in every part of North Carolina. We also know from our work in the state that many crucial programs that support well-being for North Carolina residents rely on accurate census counts to get communities the funding they need. A key area of our work is analyzing state and local budgets and advocating for budgets that meet the needs of people and communities. Good funding decisions must be informed by high-quality data about the populations that funding will serve, and budget-makers at all levels in our state rely on census data to inform their decision making. The proposed changes to the decennial Census would undermine the data quality that our organization, our partners, and lawmakers rely on.

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Our concerns about the proposed changes and their impact on North Carolina are as follows:

Rule 1: Redefining "usual residence" and relying on tax records to verify addresses risks incorrectly counting or missing some residents

Changing the definition of usual residence to the place that people have "lawfully spent the greatest number of days during the census enumeration period" from January 3rd to April 1st is arbitrary and likely unclear for many respondents. As to the use of tax records, there are also many cases in which the mailing address on people's tax records may not match their physical address, for example because they use a PO Box. Relying on tax records could also exclude people who don't file taxes, for example because they do not work for pay and/or because they receive only non-taxable income. The proposal does not provide clear information about how the Census Bureau will address situations in which people's physical home does not match their tax records. The impact could be especially great for populations that have significant representation in North Carolina.

North Carolina is one of the fastest growing states in the country. Under previous rules, people who made a permanent move to North Carolina at the end of March would clearly understand that their residence is at their North Carolina address. Under the proposed rule, these people may list their previous residence rather than where they live on April 1, leading to an undercount of the state's true population.

The state is home to a significant number of college students, with over 208,000 undergraduate students in the University of North Carolina system alone. College students' location during these months may not match their actual residence, and they may file taxes at the address of a parent or guardian, which would not match their location at school during the reference months. The 2020 Census included specific guidance for college students, but the proposed rule does not. Any rule changes should include specific guidance for students.

North Carolina has the fourth largest population of active-duty service members in the country, and the new rule could lead to inaccurate or incomplete counts of military personnel and their dependents. Military servicemembers' W-2 tax forms may reflect their duty station rather than residential address, and the rule is not clear on how it will treat cases in which tax data and reported residence differ.

In disaster-impacted communities, people with unstable housing may end up excluded or assigned to the wrong location. North Carolina communities are still recovering from recent hurricanes, including

Hurricane Helene two years ago, which led to an increase in homelessness in the Western part of the state. Our state will remain vulnerable to hurricanes into the future, making this an ongoing issue.

Rule 1: Including only citizens and lawful permanent residents excludes many North Carolina residents and is likely to have a chilling effect that also undercounts citizens

Excluding noncitizens without lawful permanent residence from census apportionment data is unconstitutional, given the Constitution's requirement to count the "whole number of persons in each State." This change, a major break from prior practice, would exclude many North Carolina residents from the apportionment count. This includes a group of over 24,500 international students, temporary work visa holders such as those in the state's technology and agricultural sectors, and residents with humanitarian protections.

We strongly oppose adding a question about immigration status to the questionnaire, which is likely to have a chilling effect on response rates among immigrant communities. This would likely lead to undercounting of people in families with mixed immigration status, including children who are U.S. citizens and whose parents are not. North Carolina is home to about 486,000 children with at least one parent born outside the U.S., and many of these families may not respond to the questionnaire if they fear it will be used for immigration enforcement. North Carolina had an undercount of children in the 2020 Census of an estimated 6.06 percent, and undercounting children jeopardizes effective planning for many public services ranging from schools to public health.

Rule 2: Removing questions about race and ethnicity takes away critical information about our state's residents that is needed for understanding disparities, enforcing civil rights laws, and ensuring that everyone in North Carolina has the opportunity to thrive.

The race and ethnicity data collected in the decennial census forms the basis of many key datasets and other population surveys. Even if race and ethnicity questions are asked in other surveys, this data would be compromised without the ability to benchmark to the decennial survey. North Carolina is a racially diverse state that also has a substantial rural population, with the third largest share of rural residents of any state, according to the 2020 Census. In rural areas with small populations, sample-based surveys like the American Community Survey may not provide accurate population data, making the full census count especially important.

At the NC Budget & Tax Center we work to ensure that everyone in our state gets the public investment they need for their families and communities to thrive, regardless of their race or ethnicity. Without accurate data, it's impossible to assess racial disparities in investment or outcomes, in areas like economic stability, education, and health.

Questions about race and ethnicity have been asked in every U.S. census since the survey began in 1790. There is no evidence that these questions reduce response rate, but they do remove critical information about our communities.

We urge you to reject the proposed changes to the 2030 census.

In summary, the proposed changes would make a key source of data for our organization and our state less accurate and incomplete. We strongly urge you to reject these changes. We appreciate your consideration of these comments. Please contact us with any questions.

Sincerely,



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