November 2, 2026

SUBMITTED VIA REGULATIONS.GOV

Daniel Sweeney
Deputy General Counsel for Economic, Statistical, and Regulatory Affairs
Office of the General Counsel
U.S. Department of Commerce
Washington, DC 20230

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Federal Register Notice Docket Number USBC-2026-0628)

Dear Mr. Sweeney:

The undersigned 157 organizations write 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 rule's changes to the residence criteria and demographic items for the 2030 Census and believe that the proposed rulemaking would result in less accurate and poorer quality census data. We urge the Census Bureau (Department Commerce) to withdraw this proposed rule.

The undersigned organizations are a diverse set of national, state and local advocacy and direct services organizations serving the Asian American, Native Hawaiian and Pacific Islander (AANHPI) communities, representing 34 states and the District of Columbia. They view the collection of useful, objective data about our nation and its communities to be an important civil rights issue. These organizations recognize the important part census data play in ensuring proper political representation, fair allocation of federal funding, and effective and efficient planning and policy decision-making by private and public sectors. Most have worked to ensure the fair and accurate decennial census count, either through policy advocacy and/or get-out-the-count efforts to mobilize and encourage AANPHI community members to participate in the census. Finally, the undersigned organizations also represent data users who utilize census data to conduct research, publish reports, identify community needs and develop effective solutions, write grant reports and proposals, among other day-to-day activities.

We are extremely concerned that the proposed residence criteria and changes to demographic questions would undermine the accuracy, integrity, and usefulness of census data, including for AANHPIs, which will thereby harm these communities moving forward. The census belongs to all of us, and we all have the right to be counted. We the people deserve accurate data. Accurate census data ensure that all communities receive

their fair share of resources and political representation. To that end, we offer the following comments to share our concerns and recommendations.

The proposed exclusion of non-citizens without lawful permanent residence from census apportionment data is unprecedented, unconstitutional, and harmful to AANHPIs

The proposed exclusion flies in the face of history and the law

The proposed rule has no basis in history, precedent, or the Constitution. The Constitution, statutes, and settled law clearly provide that all persons residing in the United States must be counted for the apportionment of Congressional seats.

The Fourteenth Amendment, Section 2, requires apportionment by "the whole number of persons in each State," with one express carve-out ("Indians not taxed").[1] Article I, Section 2, says "persons," not "citizens" or "inhabitants" — and the record shows that choice was deliberate. The Constitution allows no requirements beyond being a "person" to be included in the census. But even if that were not true, even some "allegiance" or more onerous requirement could not support the proposed rule. At the time of the adoption of the Fourteenth Amendment, American jurists recognized that anyone who "resides" in a nation owes a form of allegiance to that nation. "Local allegiance," Webster's dictionary of 1828 noted, was a duty "due from an alien to the government or state in which he resides." An 1860 law dictionary further explained, "in the United States, during the residence of aliens amongst us, they owe a local allegiance, and are equally bound with natives to obey all general laws for the maintenance of peace and the preservation of order...." It was widely understood that local allegiance was predicated on residence, not domicile.[2]

Moreover, Congress has repeatedly rejected the proposed criteria. The 1929 Census Act debates are dispositive. Both the House and Senate considered amendments excluding noncitizens, including undocumented immigrants, from apportionment and ultimately decided against their inclusion in the legislation.[3] Senate legislative counsel advised that

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[1] U.S. Const. Art. I, Sec. 2, Cl. 3; U.S. Const., amend. XIV, § 2.

[2] James Kent, Commentaries on American Law, O.W. Holmes, Jr. ed., vol. 2, [1827], (Little, Brown and Company, 1873), 39, 65; Noah Webster, An American Dictionary of the English Language (1828) Webster's Dictionary 1828, https://websters1828.com/; Alexander M. Burrill, A Law Dictionary and Glossary: Containing Full Definitions of the Principal Terms of the Common and Civil Law (1860, 2d. ed.), 86, 164. *See also Trump v. Barbara*, 146 S. Ct. 2438, 2445 (2026) (discussing "allegiance"). *See also*, Expert Decl. of Prof. Beth Lew-Williams, Dkt. No. 41-3, *OCA-Asian Pacific American Advocates v. Rubio*, No. 1:25-cv-00287 (D.D.C. Aug. 13, 2025), *available at* https://storage.courtlistener.com/recap/gov.uscourts.dcd.276965/gov.uscourts.dcd.276965.30.10.pdf. It was in part for this reason that the Supreme Court recently found that birthright citizenship extends to children of undocumented immigrants and persons temporarily in the United States. It would be bizarre for a child to be born in this country to parents legally invisible to the census.

[3] In the Senate, the Sackett amendment which would exclude aliens from apportionment was defeated 29–48; the Harrison amendment which would require dual tabulation with and without non-citizens was

there was no constitutional authority for such legislation.[4] Congress then adopted the Fourteenth Amendment's exact "whole number of persons" formula into what is now 2 U.S.C. § 2a. Parallel efforts failed in 1940, 1980, and 1990, and a three-judge court in *FAIR v. Klutznick* (D.D.C. 1980) called the exclusion claim "very weak on the merits" because immigrants "legal and illegal alike, are clearly 'persons.'"[5]

Finally, the proposed exclusion disturbs 236 years of unbroken practice rooted in the 1790 Census Act, which established the "usual residence" rule without regard to citizenship, length of residence, or intent to stay. The proposed rule radically redefines the concept of "usual residence" to mean where one "lawfully spent the greatest number of days" without any justification. No prior residence criterion has ever conditioned a respondent's physical residence in an area on their legal status.

AANHPIs will be disproportionately harmed by this aggressive and unconstitutional attempt to exclude non-citizens without lawful permanent residence

Given that these changes are not dictated by the text of the Constitution, we question whether a different purpose is motivating this proposed rule. The proposed rule evokes a similar case argued by the Administration that birthright citizenship should be limited – in contradiction to the clear text of the Constitution. In that case, the Trump administration relied on outdated and racist ideas about who belongs in the U.S.[6] Similarly here, the proposed rule seems designed to send a message that certain immigrants do not belong in the U.S., and should not be considered by lawmakers and policymakers in planning for the future.

Indeed, the proposed rule echoes the discrimination Asian Americans have historically faced throughout U.S. history.[7] From the mid-19th century with the arrival of Chinese workers on the West Coast[8] and eventual scapegoating for the lack of economic

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defeated 24–55; and the Black amendment which would separately enumerate lawful and unlawful aliens was defeated 24–56. Efforts in the House by Representatives Hoch and Bankhead were ultimately not included as a result of the Tilson compromise. *See* Brief for Historians of the Census as Amicus Curiae, pp. 28-33, *Trump v. New York*, 592 U.S. 125 (2020), *available at* https://www.supremecourt.gov/DocketPDF/20/20-366/160852/20201116152445544_20-366%20BRIEF%20OF%20AMICI%20CURIAE%20HISTORIANS%20OF%20THE%20CENSUS%20IN%20SUPPORT%20OF%20APPELLEES.pdf.

[4] *Id*.

[5] *Id*.

[6] *See* First Am. Compl. ¶¶96-151, OCA v. Rubio, No. 1:25-CV-00287-TJK (D.D.C. June 30, 2025), *available at* https://www.advancingjustice-aajc.org/sites/default/files/2025-07/2025-06-30%20Notice%20%5Bdckt%2027_1%5D.pdf.

[7] See Erika Lee, The Making of Asian America: A History (New York: Simon and Schuster, 2015), 3

[8] Office of the Historian, "Chinese Immigration and the Chinese Exclusion Acts," Milestones: 1866–1898, Milestones in the History of U.S. Foreign Relations (Foreign Service Institute, United States Department of State), accessed March 16, 2024, https://history.state.gov/milestones/1866-1898/chinese-immigration.

opportunity,[9] to the passage of the Chinese Exclusion Act of 1882,[10] Asian Americans have been seen as outsiders and are treated as perpetual foreigners regardless of their nativity. With the passage of the Immigration Act of 1924, "existing laws already excluded Asian immigrants from becoming naturalized citizens."[11] The law established a natural origins quota and prevented "Asians that were not already barred from entry," (such as the Japanese) from immigrating.[12] These laws remained in effect until they were repealed beginning with the Repeal of Chinese Exclusion in 1943[13] and ending with the 1952 Immigration Act.[14] It was not until the passage of the Hart-Celler Act in 1965 that national origin quotas that disfavored Asian immigration were eliminated.[15] Asian Americans who were in country prior to these exclusionary laws being passed were denied the right to naturalize.[16]

On its face, the proposed change similarly excludes many people who legally reside in the U.S. but are not citizens or lawful permanent residents, including refugees, asylees and asylum seekers, Temporary Protected Status (TPS) and Deferred Action for Childhood Arrivals (DACA) recipients, people on H-1B and other work visas, international students, and people with pending green-card applications — many of them lawfully present, tax-paying, long-settled residents.

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[9] George Anthony Peffer, "Forbidden Families: Emigration Experiences of Chinese Women under the Page Law, 1875-1882," Journal of American Ethnic History 6, no. 1 (Fall 1986): 28–46.

[10] The Chinese Exclusion Act was the first U.S. immigration law to bar an entire ethnic group, effectively prohibiting Chinese immigrants from entering the U.S. for about 60 years and barred anyone of Chinese descent from gaining citizenship. 22 Stat. 58, 47 Cong. Ch. 126. "Chinese Exclusion Act (1882)," Milestone Documents (Washington, DC: National Archives, January 17, 2023), https://www.archives.gov/milestonedocuments/chinese-exclusion-act.

[11] Anti-Asian Laws and Policies," National Park Service, May 27, 2025, https://www.nps.gov/articles/000/antiasian-laws-and-policies.htm.

[12] Anti-Asian Laws and Policies," National Park Service, May 27, 2025, https://www.nps.gov/articles/000/anti-asian-laws-and-policies.htm.

[13] Office of the Historian, "Repeal of the Chinese Exclusion Act, 1943," Milestones: 1937-1945, Milestones in the History of U.S. Foreign Relations (Foreign Service Institute, United States Department of State), accessed April 23, 2026, https://history.state.gov/milestones/1937-1945/chinese-exclusion-act-repeal.

[14] Office of the Historian, "The Immigration and Nationality Act of 1952 (The McCarran-Walter Act)," Milestones: 1945-1952, Milestones in the History of U.S. Foreign Relations (Foreign Service Institute, United States Department of State), accessed April 23, 2026, https://history.state.gov/milestones/1945-1952/immigration-act.

[15] "Overturning Exclusion, Limiting Immigration," History, Art & Archives United States House of Representatives, https://history.house.gov/Exhibitions-and-Publications/APA/Historical-Essays/Exclusionto-Inclusion/Overturning-Exclusion-Limiting-Immigration/.

[16] Marian L. Smith, "Race, Nationality, and Reality: INS Administration of Racial Provisions in U.S. Immigration and Nationality Law Since 1898," Prologue Magazine, Summer 2002, https://www.archives.gov/publications/prologue/2002/summer/immigration-law-1.

More than half of all non-citizens potentially will be excluded under the proposed rule;[17] and about one in three non-citizens from Asian countries might be excluded from 2030 counts.[18] As the only major racial or ethnic group in the U.S. that is primarily immigrant, Asian Americans will be disproportionately affected by the proposed rule. The Asian American population has grown rapidly since 2000, more than doubling in the last quarter-century, making it the fastest-growing major racial group.[19] This growth is primarily due to immigration, which also explains the high percentage of immigrant Asian Americans in the U.S. Overall about one in five Asian Americans are non-citizens. The potential impact of the proposed rule on Asian Americans varies by detailed Asian subgroup. Nearly half of Nepalese Americans and around two in five Burmese, Malaysians, Bhutanese, and Mongolians are non-citizens, while less than six percent of Hmong and less than two percent of Okinawans could be impacted.[20]

Immigration is a complex issue for NHPIs, with immigrants coming from diverse islands and nations, each with their own unique political ties to the U.S. "Native Hawaiians and Pacific Islanders born in Hawai'i, Guam and the Commonwealth of the Northern Mariana Islands are U.S.-born citizens. While Pacific Islanders from U.S. territories like American Samoa are U.S. nationals. And Pacific Islanders from the Freely Associated States (FAS) are labeled nonimmigrants under [Compact of Free Association] COFA agreements between the U.S. and FAS."[21] Some Pacific Islanders "are considered foreign nationals from countries with no U.S. association and must apply for legal permanent resident (LPR) status to move to the United States."[22]

In addition to the excluded categories above, the proposed rule also excludes COFA migrants. COFA allows citizens of the Marshall Islands, Federated States of Micronesia, and Palau (foreign nations) to legally reside in the U.S. without a visa. While COFA migrants

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[17] Jeffrey S. Passel and Jens Manuel Krogstad, "U.S. Unauthorized Immigrant Population Reached a Record 14 Million in 2023," Pew Research Center, August 21, 2025, https://www.pewresearch.org/race-and-ethnicity/2025/08/21/u-s-unauthorized-immigrant-population-reached-a-record-14-million-in-2023/.

[18] Calculations based on estimates of the non-citizen population from the 2024 American Community Survey, 2024 revised USCIS estimates of the legal permanent resident population, and estimates of individuals with Special Status of Pacific Island States. We assume all other non-citizens are either temporary legal status or undocumented.

[19] Carolyne Im, Pew Research Center, Factsheet: Facts about Asians in the U.S. (May 1, 2025), https://www.pewresearch.org/race-and-ethnicity/fact-sheet/asian-americans-in-the-u-s/.

[20] U.S. Census Bureau, "NATIVITY AND CITIZENSHIP STATUS IN THE UNITED STATES," *American Community Survey, ACS 5-Year Estimates Selected Population Detailed Tables , Table B05001*, accessed on September 30, 2026, https://data.census.gov/table/ACSDT5YSPT2021.B05001?t=-04:Citizenship.

[21] Empowering Pacific Islander Communities, A Community of Contrasts in the United States 2025: Native Hawaiians and Pacific Islanders, https://drive.google.com/file/d/1rWvS9OG881PumvbfCc6lYyBeSxIpvwRa/view.

[22] Empowering Pacific Islander Communities, A Community of Contrasts: Native Hawaiians and Pacific Islanders in the United States, 2014, https://static1.squarespace.com/static/5ef63030d9999309b65e3c91/t/6115277a7e4218049cc9d8b6/1628776334313/NHPI+Demogrpahic+Profile+%28National%29.pdf.

have documentation indicating their legal status (I-94), they do not hold a Green Card (lawful permanent resident status) even though they may be in the U.S. permanently.

Impacts of the proposed rule fall disproportionately on specific Pacific Islander groups. The most recent data available (2021 ACS Selected Population Detailed Tables) shows about 119,000 non-citizen NHPIs living in the U.S. About 10,000 are American Samoans who are U.S. nationals but not citizens. Another 52,000 are individuals from the COFA states. That leaves about 57,000 non-citizen NHPIs who could be either LPRs or outside of the proposed rule. While Native Hawaiians are largely U.S.-born, Tongans (8,117 non-citizens, or about 12% of Tongans) and Fijians (9,634, or 19%) are the most impacted groups under the proposed rule. Micronesians, who are mostly from COFA states, are deeply impacted pursuant to the proposed rule, with 52,148 non-citizens at 19% of the population.

Excluding non-citizens will harm the accuracy of census data, thereby harming all

Regardless of whether the exclusion occurs through the addition of an immigration status question or the use of administrative records to determine status, excluding non-citizens from apportionment will seriously harm the accuracy of census data. Studies indicate that adding a question about immigration status to the census likely makes people more apprehensive about responding to the census and more likely to omit members of their household, making census data less accurate.[23] Furthermore, administrative records have not been established as a reliable source of information on immigration status.[24] In either scenario, the quality of census data will decrease either through depressed participation rates or unreliable administrative records.

The resultant poor census data will deprive all communities of essential services and resources. Census data are the basis for distributing more than $2.8 trillion annually through 353 federal assistance programs, including Medicaid, Medicare Part B, SNAP, highway funds, Title I, school lunch, and child care programs.[25] Excluding people from the count does not remove them from emergency rooms, classrooms, roads, or transit systems. It removes the money that pays for those things, and every resident of the affected community absorbs the shortfall.

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[23] *See,* Leadership Conference on Civil and Human Rights, Comment to the Census Bureau re: "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions," (Nov. 2026) ("Leadership Conference Comments"). *See also,* Census Quality Reinforcement Task Force, Comment to the Census Bureau re: "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions" (Nov. 2026) ("CQR Comments").

[24] *See,* CQR Comments.

[25] Ceci Villa Ross, U.S. Census Bureau, Uses of Decennial Census Programs Data in Federal Funds Distribution: Fiscal Year 2021 (June 2023), https://www2.census.gov/library/working-papers/2023/decennial/census-data-federal-funds-fy-2021.pdf ("Census Federal Funds Distribution").

Recommendation:

- Revert back to the 2020 Census Residence Criteria as it relates to the counting of non-citizens.
- Do not include a question on the decennial census form asking about citizenship or immigration status.
- Count all persons for purposes of apportionment as required by the Constitution and relevant laws and statutes.

The proposed removal of including certain demographic questions, including on race and ethnicity, on the decennial census form is unprecedented, unlawful and puts AANHPI communities in jeopardy

As the nation continues to rapidly diversify, government agencies can best understand, and effectively address, the needs of diverse communities through accurate and standardized race and ethnicity data collection and reporting. Removing race and ethnicity questions makes this the only census in history without data on race and ethnicity. Demographic questions have appeared in every census since 1790 (for 236 years), including the collection of race and ethnicity data in some form.[26] There is no precedent for a decennial census that does not ask about race and ethnicity.

Census race and ethnicity data underpin many other critical federal datasets and serve as an irreplaceable benchmark for nearly every population-based survey and study in the U.S., ensuring that our research is reliable and leads to better outcomes for everyone.[27] Race and ethnicity data are vital to protecting public health and safety because they allow health officials to identify and address differences in health risk factors. They are necessary to enforce civil rights laws and ensure equal opportunity for all Americans, helping to safeguard fairness and strengthen the U.S. economy. Race and ethnicity data also give businesses market insights to grow and compete and help local governments and nonprofits target services more efficiently.

Ensuring strong federal data collection and reporting standards are particularly important for AANHPIs. According to the 2020 Census, these groups comprise almost 24 million people who can trace their heritage to more than 50 different countries and who speak over 100 different languages. The federal government is often the primary source of detailed, disaggregated data on these communities.

Having access to detailed, disaggregated data is critical because subgroups among Asian Americans and NHPIs can diverge significantly across key social and economic indicators. For example, only 2.8% of Taiwanese American adults and 2.9% of Japanese American

[26] U.S. Census Bureau, Historical Census Statistics on Population Totals by Race, 1790 to 1990, and by Hispanic Origin, 1970 to 1990, https://www.census.gov/library/working-papers/2002/demo/POP-twps0056.html.
[27] See, Leadership Conference Comments.

adults have less than a high school diploma in comparison to 24.2% of Cambodians, 22.3% of Vietnamese and 43.8% of Burmese. Less than a quarter of Asian Indians, Filipinos, Japanese, Pakistanis and Sri Lankans are Limited English Proficient (i.e., speak English "less than very well"), while 40.4% of Vietnamese, 51.1% of Burmese, and 34.4% of Chinese are Limited English Proficient. Asian Americans without health insurance include 8.2% of Thai, 9.9% of Nepalese, and 11.3% of Burmese compared with 3.7% of Japanese and 4.0% of Asian Indians.[28] For NHPIs,11.9% of Micronesians speak English less than "very well," while only 1.9% of Native Hawaiians do. Similarly, 13.7% of Micronesian families live in poverty, while only 10.3% of Native Hawaiian families do.[29] These statistics underscore the importance of the type of detailed race and ethnicity data collected by federal departments.

Census data are the building blocks for our society. They serve as the basis for reapportioning political representation and redistricting at all levels, informing effective and efficient policy and planning decisions, and distributing federal funds to the states.[30] Policy and planning decisions will not address the needs of growing AANHPI communities without an accurate count of AANHPIs. For example, in the context of health disparities, in 2018, 87% of all reported Tuberculosis (TB) cases in the U.S. occurred in racial and ethnic minorities.[31] Asian Americans represented 35% of all people reported with TB and had a rate of TB that was 31 times higher than the rate of TB in non-Hispanic whites.[32] Furthermore, detailed race and ethnicity data are equally important. U.S.-born Vietnamese American women are four times more likely to die of breast cancer than any other Asian American group. Korean American children are "four times more likely to have no health insurance as compared to others."[33] Race and ethnicity data, as well as data disaggregation, are critical because they allow us to see these differences. Without these data, broad trends can mask much more negative or nuanced outcomes for specific groups and subgroups of people, leaving their needs and issues invisible and unmet.

Recommendation:

- Abandon the proposed restrictions on the inclusion of certain demographic questions in the decennial census operation.

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[28] U.S. Census Bureau, "Selected Population Profile in the United States," American Community Survey, ACS 1-Year Estimates Selected Population Profiles, Table S0201, accessed on September 30, 2026, https://data.census.gov/table/ACSSPP1Y2024.S0201?t=-04.

[29] U.S. Census Bureau, "Selected Population Profile in the United States," American Community Survey, ACS 1-Year Estimates Selected Population Profiles, Table S0201, accessed on September 30, 2026, https://data.census.gov/table/ACSSPP1Y2024.S0201?t=-05.

[30] Census Federal Funds Distribution.

[31] U.S. Centers for Disease Control and Prevention, Health Disparities in Asian People (Jan. 25, 2024), https://www.cdc.gov/health-disparities-hiv-std-tb-hepatitis/populations/asian.html.

[32] *Id*.

[33] Pfizer, Health Disparities Among Asian Americans and Pacific Islanders, https://www.pfizer.com/news/articles/health_disparities_among_asian_americans_and_pacific_islanders.

- Continue collecting race and ethnicity data and implement the 2024 OMB SPD 15 standards, including through the inclusion on a question on race and ethnicity on the decennial census form.

The Census Bureau (Department of Commerce) must ensure meaningful public engagement on the residence criteria and proposed rulemaking, including through the extension of the comment period

It is imperative that the Census Bureau meaningfully engage the public about its proposed plans for the 2030 Census as it seeks to count everyone once, only once, and in the right place. In this instance, the proposed rule regarding the Residence Criteria and its proposed prohibition on certain demographic questions has far-reaching and extensive implications with changes that would alter the form and content of the decennial census in a significant departure from accepted practice over the course of almost 250 years and 24 censuses.

The initial 33-day public comment period that was to close on October 13, 2026 was wholly inadequate. We appreciate the extension provided by the Census Bureau to November 2, 2026, for a total of 53 days with the additional 20 days.[34] However, given the deviation from historic precedent and long-standing standards, as well as the seriousness and importance of the changes, even a 53-day comment window is insufficient for the public to properly evaluate and respond to the proposed changes.[35] Furthermore, with the Secretary of Commerce's termination of Census Bureau advisory committees, ensuring that there is ample opportunity for the public to respond to these changes is paramount in helping promote public trust in the decennial census.[36] The public—including state and local, and Tribal governments, businesses, demographers, civil rights and other nonprofit organizations, researchers, and legal scholars—needs sufficient time to evaluate and comment on these changes with that goal guiding such analysis. A full 90-day comment period is both warranted and prudent in this situation.

We further offer the following as best practices for community engagement generally:

- Engage interested stakeholders early and often. Bringing community members into the conversation early in the planning process can circumvent mistakes and

[34] Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions; Extension of Comment Period, 91 Fed. Reg. 63207 (Oct. 5, 2026), https://www.govinfo.gov/content/pkg/FR-2026-10-05/pdf/2026-20328.pdf.
[35] *See* Request for Extension of Comment Period for Proposed Rule: "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions" for an in-depth discussion about the insufficient comment period and the need for an extension.
[36] Letter from Leadership Conference on Civil and Human Rights et al, to Howard Lutnick, Secretary, Department of Commerce (May 7, 2025), https://civilrights.org/wp-content/uploads/2025/05/Updated-Final-LCCHR-Census-Advisory-Committee-Letter-.pdf.

inaccuracies—which undermine trust in the federal government and broader efforts to collect data on impacted communities.
- Engage with a diverse set of stakeholders, including both community-specific partners as well as those representing a broader perspective.
- Be specific about what is being discussed, any requests being made of the community, and what specific information the agency is attempting to obtain. In instances of prior engagement, it is incumbent on the agency to highlight any major changes that have occurred or are being considered at the point of the most recent request, as well as lifting up any points of potential controversy for feedback. Providing specific requests and the requisite background information will only help groups provide the most useful feedback to the agency.

Recommendation:

- Extend this comment period to a total of 90 days for an *adequate and meaningful opportunity* for public review and comment given the complexity and potential significant implications and consequences of the proposed changes.

Conclusion

These provisions would suppress census participation, distort population counts, and silence entire communities, including AANHPIs. An inaccurate census would weaken the fairness and effectiveness of our democracy and divert critical resources away from where they are needed most. These consequences would harm everyone, regardless of citizenship, race, ethnicity, or where they live, and undermine our nation's ability to make informed policy decisions. This rule, as a whole, would result in inaccurate and skewed census data.

We again request that the Census Bureau and Department of Commerce give serious consideration to all public comments on this proposed rule and extend the period for public comment to 90 days total, so they can more clearly understand the vast implications of the proposed rule. We further urge the Census Bureau (Department of Commerce) to withdraw this proposed rule and implement the recommendations listed above.

Sincerely,
Asian Americans Advancing Justice | AAJC (National)
18 Million Rising (National)
AAPI Coming Together (Florida)
AAPI Equity Alliance (California)
AAPI NJ (New Jersey)
Ahri for Justice (California)
AKPIRG (Alaska)
Al Otro Lado (California)
APA Justice (National)

APANO (Oregon)
API Tennessee (Tennessee)
APIA Vote-Michigan (Michigan)
Arkansas Coalition of Marshallese (Arkansas)
Asian & Pacific Islander American Health Forum (National)
Asian American Advocacy Fund (Georgia)
Asian American Civic Association (Massachusetts)
Asian American Federation (AAF) (New York)
Asian American Federation of Florida (Florida)
Asian American Institute for Research and Engagement (New York)
Asian American LEAD (AALEAD) (Maryland, District of Columbia, and Virginia)
Asian American Legal Defense & Education Fund (AALDEF) (National)
Asian American Resource Workshop (AARW) (Massachusetts)
Asian American Students Alliance at Yale (Connecticut)
Asian Americans Advancing Justice |Atlanta (Georgia)
Asian Americans Advancing Justice | Chicago (Illinois)
Asian Americans Advancing Justice Southern California (AJSOCAL) (California)
Asian Americans for Community Involvement (AACI) (California)
Asian Americans United (Pennsylvania)
Asian and Pacific Islander American Vote (APIAVote) (National)
Asian Caribbean Exchange (Florida)
Asian Community & Cultural Center (Nebraska)
Asian Community Development Corporation (Massachusetts)
Asian Community Fund at the Boston Foundation (Massachusetts)
Asian Counseling and Referral Service (Washington)
Asian Girls Ignite (Colorado)
Asian Law Alliance (California)
Asian Pacific Americans for Higher Education (APAHE) (National)
Asian Pacific Islander Forward Movement (California)
Asian Pacific Islanders Civic Action Network, Massachusetts (Massachusetts)
Asian Pacific Islanders Coalition of South Puget Sound (Washington)
Asian Pacific Partners for Empowerment, Advocacy and Leadership (APPEAL) (National)
Asian Prisoner Support Committee (California)
Asian Resources, Inc. (California)
Asian Student Alliance (Georgia)
Asian Task Force Against Domestic Violence (ATASK) (Massachusetts)
Asian Texans for Justice (Texas)
Asian Women for Health (Massachusetts)
Asians for Collective Action (Washington)
Asians for Collective Liberation in Spokane (Washington)
AYPAL: Building API Community Power (California)
AZ AANHPI for Equity (Arizona)
Bhutanese Community Association of Pittsburgh (BCAP) (Pennsylvania)
Boston Public Health Commission (Massachusetts)

Bottles To Soccer (Oregon)
CA Healthy Nail Salon Collaborative (California)
CAIR-Texas (Texas)
Cambodia Town Inc. (California)
Cambodian Mutual Assistance Association (Massachusetts)
CASL (Illinois)
Center for Southeast Asians (Rhode Island)
Chhaya Community Development Corporation (New York)
Chinese Community Center (Texas)
Chinese for Affirmative Action (California)
Chinese Information and Service Center (CISC) (Washington)
Chinese Progressive Association (California)
Coalition for a Better Chinese American Community (Illinois)
Coalition for Anti-Racism and Equity (Massachusetts)
Coalition for Asian American Children and Families (New York)
Coalition on Human Needs (National)
Colorado Asian Culture and Education Network (Colorado)
Committee of 100 (National)
Communities Advancing Prosperity for Immigrants (CAPI) (Minnesota)
Empowering Pacific Islander Communities (EPIC) (California and National)
Filipino Advocates for Justice (California)
Filipino American National Historical Society (National)
Filipinx for Immigrant rights and Racial justice MN (FIRM) (Minnesota)
Filipinx Igniting Engagement for Reimagining Collective Empowerment (FIERCE) Coalition (California)
Florida Asian Services (Florida)
Frontera Federation (Texas)
Future of Us (Minnesota)
Hamkae Center (Virginia)
HANA Center (Illinois)
Heart Mountain Wyoming Foundation (Wyoming)
Hmong American Partnership (Minnesota)
Hmong National Development (National)
Hoosier Asian American Power (Indiana)
Humboldt Asians and Pacific Islanders in Solidarity (California)
IHM Sisters (National)
Immigrant Legal Resource Center (National)
Institute for Asian American Studies (Massachusetts)
Jakara Movement (California)
Japanese American Citizens League (National)
Japanese American Citizens League – Arizona Chapter (Arizona)
Japanese American Citizens League (Illinois)
Japanese American Citizens League (California)
Karen Organization of San Diego (California)

Korean American Coalition (California)
LEAD Filipino (California, Texas, and Nevada)
Leadership Education for Asian Pacifics, Inc. (LEAP) (National)
Maitri (National)
Make the Road Nevada (Nevada)
Making Sunshine (Massachusetts)
Mekong NYC (New York)
Michigan Immigrant Rights Center (Michigan)
MinKwon Center for Community Action (New York and New Jersey)
Minnesota 8 (MN8) (Minnesota)
Missouri Asian American Youth Foundation (Missouri)
MoCoPAAN (Maryland)
NAKASEC TX (Texas)
National CAPACD (National)
National Council of Asian Pacific Americans (NCAPA) (National)
National Immigration Law Center (National)
National Korean American Service Education Consortium (Pennsylvania, Michigan, New York, New Jersey, Illinois, Texas, and Virginia)
National Partnership for New Americans (National)
National Queer Asian Pacific Islander Alliance (National)
New Mexico Asian Family Center (New Mexico)
Nikkei Progressives (California)
Noor Family Services Corporation (Georgia)
North Carolina Asian Americans Together (North Carolina)
OCA - Greater Philadelphia (Pennsylvania and New Jersey)
OCA National (National)
OCA South Florida Chapter (Florida)
OCA-Greater Houston (Texas)
One APIA Nevada (Nevada)
OPAWL - Building AAPI Feminist Leadership (Ohio)
Pacific Asian Counseling Services (California)
Pacific Community of Alaska (Alaska)
Pax Christi Long Island (New York)
Philippine Center of Minnesota (Minnesota)
Pilipino Workers Center (California)
Providence Youth Student Movement (Rhode Island)
Rainbow Railroad (National)
Refugee Advocacy Lab (National)
Revere Youth in Action (Massachusetts)
Rising Voices (Michigan)
SAAVETX EF (Texas)
Sadhana: Coalition of Progressive Hindus (New York)
Services, Immigrant Rights and Education Network (SIREN) (California)
Sikh American Legal Defense and Education Fund (SALDEF) (National)

South Asian American Policy & Research Institute (SAAPRI) (Illinois and the Midwest)
South Asian Network (California)
South Asian SOAR (National)
South of Market Community Action Network (SOMCAN) (California)
Southeast Asian Coalition (North Carolina)
Stand with Asian Americans (National)
Stop AAPI Hate (National)
The Greater Malden Asian American Community Coalition (Massachusetts)
The Sikh Coalition (National)
Unified Asian Communities (Maine)
Unitarian Universalists for Social Justice (National)
United Parent Leaders Action Network (National)
University of Maryland, Asian American Studies Program (Maryland)
UPICEC (Utah)
Virginia Coalition for Immigrant Rights (Virginia)
Wisconsin Asian American Voices for Empowerment (Wisconsin)
Women Employed (Illinois)
Woori Juntos (Texas)