Illinois State Association of Counties

November 2, 2026

Deputy Under Secretary George M. Cook
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

RE: ISACo COMMENTS ON DECENNIAL CENSUS OF THE POPULATION OF AMERICANS; PROPOSED RESIDENCE CRITERIA AND PROPOSED REGULATIONS FOR DEMOGRAPHIC QUESTIONS (DOCKET NO. 260903-0005; RIN 0607-AA75)

Dear Deputy Under Secretary Cook:

On behalf of the Illinois State Association of Counties (ISACo), I respectfully submit these comments regarding the U.S. Census Bureau's proposed rule, *Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions.*

ISACo is a statewide organization advocating on behalf of our member counties. Illinois' 102 counties serve communities ranging from the nation's third-largest metropolitan area to small rural and agricultural communities. County governments administer and deliver essential public services, including public safety, transportation infrastructure, public health, elections, emergency management, judicial administration, and services for vulnerable populations.

Accurate and reliable census information is essential to counties' ability to plan, finance, and deliver these services. Decennial census data, together with subsequent federal statistical products such as the American Community Survey (ACS) and annual population estimates, informs federal funding allocations, infrastructure investments, economic development strategies, and the administration of public programs.

According to the Census Bureau, decennial census data were used in whole or in part to distribute more than $2.8 trillion through 353 federal assistance programs in fiscal year 2021. Although individual programs use different allocation methodologies, the accuracy and reliability of underlying population information are essential to the equitable distribution of federal resources.

ISACo is concerned that several provisions of the proposed rule could diminish the accuracy, completeness, and usefulness of population and demographic information, potentially creating long-term consequences for county budgets, representation, planning, and service delivery.

We respectfully offer the following comments and recommendations.

Changes to Residence Definitions and Classifications

The proposed rule would substantially revise the longstanding *usual residence* standard, under which individuals are generally counted where they live and sleep most of the time. In its place, the proposal would establish a framework based on where an individual was lawfully present for the greatest number of days between January 3 and April 1 of the decennial census year.

This change raises significant questions about the accurate geographic assignment of residents, particularly those with temporary, seasonal, or complex living arrangements.

Illinois counties encompass numerous communities where these circumstances are common. University communities, including Champaign County and McLean County, experience substantial population movement associated with academic calendars. Agricultural counties may have seasonal employment patterns, while other jurisdictions serve individuals who divide their time among multiple residences or experience temporary housing instability.

The proposed methodology could also affect individuals experiencing homelessness, children in foster care or shared custody arrangements, and persons receiving temporary residential services.

The proposal raises additional questions concerning how the Census Bureau would determine lawful presence at a particular location, including the provision under which spending as little as one hour at a location could qualify as a day for residence determination purposes.

ISACo is concerned that these requirements could introduce complexity and uncertainty without a demonstrated improvement in the accuracy of county-level population counts.

The proposed rule would also consolidate existing residence classifications for individuals living in group quarters and other nontraditional housing arrangements.

Current census guidance addresses individuals residing in correctional facilities, nursing homes, group homes, residential treatment facilities, emergency shelters, and other institutional and noninstitutional settings.

These distinctions are particularly important to Illinois counties, which operate, fund, administer, or coordinate services for many of these populations.

Without sufficiently detailed guidance, the proposed changes could increase the risk of undercounting residents or assigning them to incorrect geographic locations.

ISACo requests that the Census Bureau retain clear, population-specific residence criteria and demonstrate that any revised methodology will preserve or improve the accuracy of county-level population counts. The Bureau should also explain how individuals in group quarters and other nontraditional living arrangements would be assigned to their appropriate geographic locations.

Cross-Agency Verification and Administrative Records

The proposed rule would direct the Census Bureau to consider federal tax records and other administrative data when determining residence for enumeration and apportionment purposes.

ISACo recognizes that administrative records can be valuable tools for improving census operations, identifying potential duplication, and supporting efficient data collection. However, such records should supplement rather than displace reliable methods of determining where individuals actually reside.

Federal income tax returns, W-2 forms, and related administrative records were not necessarily designed to establish an individual's residence during the proposed January 3 through April 1 enumeration period.

Addresses appearing in these records may represent mailing addresses, post office boxes, tax preparers' offices, former residences, or other locations that differ from where an individual was actually living.

These limitations are particularly significant for college students, seasonal workers, individuals experiencing housing instability, low-income households that may not file federal income taxes, and children whose living arrangements differ from those reflected in a parent or caregiver's tax records.

In Illinois, inaccurate geographic assignments could affect population counts across county boundaries, even when the individuals involved are included in the overall statewide population.

For example, a student residing in Champaign County during the academic year may maintain administrative records associated with a family residence elsewhere in Illinois. Similarly, an individual receiving temporary services in one county may have records reflecting a previous residence in another jurisdiction.

These discrepancies could distort local population estimates and create uncertainty for federal funding, infrastructure planning, and public service delivery.

ISACo urges the Census Bureau to evaluate and publicly document the reliability of administrative records for different populations and geographic areas.

The Bureau should explain how conflicting or incomplete information would be resolved, identify safeguards against systematic geographic assignment errors, and establish procedures

through which residents and local governments can identify and seek correction of inaccurate residence determinations.

Additionally, any expanded reliance on administrative records should not impose new verification, reporting, or record-production responsibilities on county governments without clear statutory authority, meaningful consultation, and appropriate federal resources.

Citizenship, Immigration Status, and Population Counts

The proposed rule would limit the population used for congressional apportionment to U.S. citizens and lawful permanent residents, excluding individuals in other immigration classifications.

ISACo recognizes that congressional apportionment and the collection of population information for statistical and administrative purposes involve distinct legal and operational considerations.

However, the proposed rule does not adequately explain how the Census Bureau would maintain and publish complete resident population information for purposes other than congressional apportionment.

This distinction is critically important to county governments.

Federal, state, and local governments rely on different Census Bureau population products for funding allocations, population estimates, planning, and program administration.

A change to the population used for congressional apportionment should not automatically result in the exclusion of individuals from other statistical products used to evaluate actual community needs.

Counties must plan for and provide essential services based on the populations living within their jurisdictions. Public health systems, emergency response operations, transportation infrastructure, and other county services must account for community needs regardless of whether every resident is included in a particular federal apportionment classification.

The proposal also raises questions about whether the collection and use of immigration-related information could discourage census participation.

Concerns regarding confidentiality or the perceived consequences of responding may affect participation among individuals whose immigration classifications are implicated by the proposal, as well as other members of households containing individuals with differing immigration statuses.

Reduced participation could compromise population counts beyond the specific categories excluded from the proposed apportionment population.

ISACo requests that the Census Bureau clarify whether separate population counts would be maintained and published for congressional apportionment and other governmental purposes.

The Bureau should specifically explain how individuals excluded from the apportionment population would be reflected in annual population estimates, demographic datasets, and statistical products used to distribute federal assistance.

The Bureau should also evaluate the potential effects of the proposed methodology on census participation, data accuracy, and county-level population estimates.

Removal of Race and Ethnicity Questions and Optional Demographic Questions

ISACo is concerned about the proposal to prohibit questions concerning race and ethnicity on decennial census questionnaires used to enumerate the population, while making most remaining demographic questions optional.

Detailed demographic information is important to numerous county government responsibilities, including redistricting, compliance with applicable federal civil rights requirements, public health planning, language access, and the evaluation of community service needs.

Illinois county governments rely on geographically detailed census information when establishing county board districts and evaluating population changes within those districts.

Accurate demographic information is also important for assessing compliance with the federal Voting Rights Act and other applicable legal requirements.

Although the proposed rule contemplates continued collection of demographic information through other sources, including the ACS and administrative records, those sources are not necessarily interchangeable with decennial census data.

Survey-based estimates may not provide comparable precision for smaller communities, census blocks, and other geographic areas where detailed population information is essential.

This concern is particularly significant in Illinois, where counties vary substantially in population size and density. Smaller counties and rural jurisdictions may have limited access to alternative demographic datasets with sufficient geographic detail.

Making most remaining demographic questions optional could create additional challenges for data completeness and reliability. Reduced response rates to optional questions could produce gaps in information used to assess community characteristics, identify service needs, and evaluate population changes over time.

Such gaps could be particularly consequential for smaller geographic areas, where incomplete responses may limit the usefulness of available data for local government planning.

The combined effects of eliminating race and ethnicity questions and making other demographic questions optional could therefore complicate county redistricting, civil rights analysis, public health planning, and the delivery of essential services.

ISACo urges the Census Bureau to preserve the collection and publication of demographic information necessary for county government responsibilities.

Before adopting the proposed changes, the Bureau should demonstrate that alternative data sources can provide comparable accuracy, geographic detail, reliability, completeness, and accessibility.

The Bureau should also explain how it would continue producing the census-block-level demographic information necessary for local redistricting and compliance with applicable federal law.

Implications for County Funding, Representation, and Service Delivery

Taken together, the proposed changes could result in Illinois counties receiving less accurate or less complete population and demographic information, creating uncertainty for federal and state funding allocations and local government planning.

Federal programs that rely directly or indirectly on Census Bureau data include Medicaid, Community Development Block Grants, foster care assistance, rural economic development programs, and federal highway planning and construction funding.

The potential impact on any individual program would depend on its applicable funding formula and the population data used in calculating allocations.

Nevertheless, inaccuracies in census information could have consequences extending well beyond the census year, particularly where decennial population counts inform subsequent estimates used throughout the following decade.

Census-derived population information also influences the distribution of certain state-administered resources and supports fiscal and administrative decisions made by Illinois state and local governments.

Although the relationship between census information and individual state funding formulas varies, inaccurate or incomplete population data could create uncertainty in the allocation of state resources and complicate county fiscal planning.

These consequences could be especially significant for rural counties and jurisdictions with limited local revenue capacity.

Illinois counties are also responsible for maintaining transportation infrastructure, supporting public health and emergency preparedness, administering justice-related services, and meeting numerous state and federal obligations.

Changes to the availability or reliability of population information could complicate the allocation of limited public resources and the evaluation of community needs.

The proposed changes also raise concerns regarding congressional representation and local redistricting.

Changes to the population used for congressional apportionment could affect Illinois' representation in the U.S. House of Representatives. Separately, changes to the accuracy or availability of census information could complicate county board redistricting and other local representation decisions.

Importantly, counties must continue providing services responsive to the people living within their communities regardless of whether those individuals are accurately reflected in census population totals.

Excluding residents from particular population classifications or discouraging participation does not eliminate the need for public health services, emergency response, transportation infrastructure, or other essential government functions.

Instead, inaccurate population information can create a mismatch between community needs and the data used to plan for and allocate public resources.

ISACo requests that the Census Bureau conduct a comprehensive assessment of the proposed rule's potential effects on federal and state funding formulas, congressional apportionment, local redistricting, annual population estimates, and the administration of public programs.

This assessment should address differences among Illinois' urban, suburban, rural, agricultural, and university communities, as well as populations that have historically been difficult to enumerate accurately.

Data Accuracy, Confidentiality, and Public Confidence

Accurate census information depends on public confidence in the confidentiality, integrity, and appropriate use of information provided to the federal government.

The proposed changes raise questions about how the Census Bureau would balance expanded administrative data verification, revised population classifications, and the protection of individual information.

These considerations are especially important where the proposed methodology involves immigration-related classifications or the matching of information across federal agencies.

ISACo supports appropriate confidentiality safeguards that protect individual respondents while preserving the accuracy and usefulness of published population data.

The Bureau should clearly explain how the proposed regulations would affect confidentiality protections, disclosure avoidance procedures, and the reliability of small-area population statistics.

Public confidence in the census is essential to achieving comprehensive participation and accurate enumeration.

Consultation with County Governments and Administrative Impacts

County governments are important partners in the successful administration of the decennial census.

Counties support census operations through geographic information, address verification, community outreach, public education, and efforts to reach populations that may otherwise be difficult to enumerate.

They are also among the principal governmental users of census-derived information.

Accordingly, changes to census methodology should be developed through meaningful consultation with state and local governments, including county associations and officials responsible for administering programs affected by population-based funding formulas.

ISACo is concerned that the proposed rule introduces substantial methodological changes without sufficient demonstration of their practical consequences for county governments.

Before finalizing the regulations, the Census Bureau should provide a comprehensive assessment of fiscal, administrative, and operational impacts and afford affected governments an opportunity to evaluate the findings.

The Bureau should also identify any additional responsibilities that could be imposed on county governments as a result of revised verification procedures, administrative data requirements, or geographic assignment processes.

ISACo opposes the imposition of additional county administrative obligations without clear statutory authority, appropriate resources, and meaningful consultation.

Conclusion

The decennial census is a foundational component of American representative government and an indispensable resource for county administration.

Its accuracy affects congressional representation, the distribution of federal and state resources, infrastructure investments, and the ability of local governments to plan for the needs of their communities.

For Illinois' 102 counties, the consequences of inaccurate or incomplete population information could extend throughout the decade, affecting county budgets, public services, and long-term planning decisions.

ISACo supports efforts to improve census efficiency, accuracy, and administrative integrity. However, these objectives should not be pursued through changes that risk diminishing the reliability of population data, reducing the availability of essential demographic information, or creating additional administrative burdens for county governments.

Before proceeding, the Census Bureau should demonstrate that the proposed methodology would preserve accurate and comprehensive population information, maintain reliable demographic data, and avoid adverse consequences for county funding, representation, and service delivery.

Given the significance of these concerns and the absence of sufficient assurances regarding the accuracy and reliability of the proposed methodology, ISACo respectfully urges the U.S. Census Bureau and the Department of Commerce to withdraw or substantially modify the proposed rule.

Any modified proposal should address the concerns identified in these comments, preserve the availability of complete resident population data, and provide meaningful opportunities for consultation with county governments before final adoption.

Thank you for considering our perspectives on this issue.

Respectfully,

Joe McCoy
Executive Director
Illinois State Association of Counties