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October 1, 2026

VIA ELECTRONIC FILING
U.S. Census Bureau
4600 Silver Hill Rd.
Washington, DC 20233

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

Docket No.: 206903-0005

Dear Director Cook,

Virginia Municipal League (VML) appreciates the opportunity to comment on the Census Bureau's proposed rule governing residence criteria and demographic questions for the 2030 decennial census. The census is the foundation for distributing political representation and federal resources. An accurate census ensures communities receive fair funding for infrastructure, housing, education, public safety, emergency response and other essential services. Because census data guides funding and planning decisions for the next decade, accuracy is critical.

VML is concerned that several provisions of the proposed rule could reduce the accuracy of our members' population counts and affect access to federal and state resources. Our concerns include the following:

- **Apportionment and population count**: The proposed rule would limit the population counted toward apportionment to U.S. citizens and lawful permanent residents for the first time. We request additional information on how full population data would be collected, reported and communicated, to ensure that all residents are counted for the broader data set.
- **Legal-status question**: The proposed rule also raises the possibility of adding a legal-status question to the census questionnaire. Similar proposals considered for the 2020 Census were not adopted following concerns that it could reduce participation. Any decline in response rates would undermine the accuracy of our members' population counts as a whole and could impact the resources available to young children and families specifically.
- **Usual residence and the enumeration period**: The proposed shift to counting residents based on where they spend the most time during a January 3-April 1 period, rather than their usual residence throughout the year, could affect our members' population counts of students and servicemembers. We ask the Bureau to further evaluate the operational and data-accuracy impacts of this change and explain the rationale supporting it.
- **Funding impact**: Census data informs funding for other programs including Community Development Block Grants (CDBG), transit formula funding, and Title I education funding. An undercount of any portion of our members' population reduces resources available

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- across the entire Commonwealth, not just the households or individuals who go uncounted. State funding allocations depend, in many cases, on accurate census data. Changes that discourage participation risk reducing the quality of data used for both purposes.

We respectfully ask the Census Bureau to extend the current comment period for the proposed changes and to ultimately withdraw these proposed changes from consideration. Any changes to residence criteria, data collection methods or demographic questions must not compromise the accuracy of the population counts that Virginia localities rely on.

Sincerely,

Jessica Dennis
Deputy Director
Virginia Municipal League