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UnidosUS

President and CEO
Maya Wiley

February 17, 2026

Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
Washington, DC 20230

Submitted via email to acso.pra@census.gov and via regulations.gov

Re: *Federal Register* Notice Docket Number USBC-2025-0203, "Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; American Community Survey and Puerto Rico Community Survey"

Dear Ms. Dumas:

On behalf of The Leadership Conference on Civil and Human Rights, our Census Task Force co-chairs, Asian Americans Advancing Justice – AAJC and NALEO Educational Fund, and the undersigned organizations, we appreciate this opportunity to provide comments in response to the Census Bureau's notice on the American Community Survey (ACS) and Puerto Rico Community Survey (PRCS)¹, published in the Federal Register on December 19, 2025 (Docket Number USBC-2025-0203).

The Leadership Conference is a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the rights of all persons in the United States. The Leadership Conference Education Fund builds public will for state and federal policies that promote and protect the civil and human rights of all persons in the United States. Our coalition views an accurate and fair census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, to be among the most important civil rights issues of our day. The Leadership Conference's longstanding role as a Census Information Center has allowed us to underscore within our broad civil rights coalition the fundamental importance of comprehensive, high-quality data about our population, communities, and economy. We also have a long history of first-hand experience working in support of the decennial census and the ongoing ACS.

The ACS provides irreplaceable data that are vital to the informed functioning of virtually every economic sector and social institution in the United States. ACS data are necessary to carry out federal laws and implement federal programs, as Congress has codified in numerous statutes over many years. The ACS also serves as a critical testbed for the Census Bureau to evaluate new questions before adding them to the decennial census. We support the Census Bureau's efforts to continually improve the ACS and ensure that it produces high quality, reliable, and consistent data for every neighborhood and community in the nation, including rural and remote areas, so that all segments of society can function in an informed and efficient manner.

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We respectfully submit the following considerations and recommendations to strengthen the ACS and PRCS and ensure that all communities are accurately represented in the critical data they produce.

1. We call on the Census Bureau to fully and expeditiously implement the updated race and ethnicity question established in OMB's 2024 Statistical Policy Directive No. 15 (2024 SPD 15) on the 2027 ACS.

We strongly support the proposal to implement the 2024 SPD 15 race and ethnicity question on the 2027 ACS. The Census Bureau's extensive research informing the 2024 SPD 15 standards indicates that the combined question format with a distinct Middle Eastern/North African (MENA) category and detailed checkboxes and write-in spaces will yield more accurate, comprehensive, and useful data about the nation's population. The modernized question will reduce the proportion of Latino individuals classified as "Some Other Race," produce federal data about MENA communities for the first time ever, and provide more nuanced data about the diverse subgroups within the broader 1997 SPD 15 race and ethnicity categories. To achieve these improvements in data quality, the revised 2027 ACS question must include the minimum categories, detailed checkboxes, and write-in spaces with examples specified in *Figure 1* of 89 FR 22182, "Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity"², in accordance with OMB's directive to use the most detailed version of the question categories "whenever possible."

Coding and tabulation considerations:

The Census Bureau's coding and tabulation of ACS race and ethnicity data collected using the updated question must also reflect this guidance from OMB. We call on the Bureau to report the most detailed race and ethnicity data possible for all categories on the revised question, while taking appropriate measures to protect the confidentiality of data for smaller demographic groups. Since research suggests that the number of individuals reporting more than one race and/or ethnicity category will significantly increase with the revised question, we urge the Bureau to begin reporting more granular race and ethnicity datasets based on multi-race/ethnic responses, in particular. For example, the Bureau should publish data and analysis on respondents who select Black/African American and Hispanic/Latino, and Black/African American and MENA, as well as respondent combinations of subgroups within these major categories (such as Black and Dominican), as long as respondent confidentiality is protected. We also note that the Bureau is long overdue in responding to public comments^{3,4,5,6} in response to its November 18, 2024, *Federal Register* Notice on the Proposed Race/Ethnicity Code List for the American Community Survey and the 2030 Census⁷ (2030 Code List). The Bureau must update stakeholders as soon as possible on the timeline for finalizing the code list and how it is incorporating public input on the final list.

The Census Bureau must also clearly communicate to the public how it will tabulate and report race and ethnicity data under the new standards. We urge the Bureau to publish guidance for data users with varying levels of technical expertise on how to compare and bridge data collected under the revised question with previous data. In particular, the Bureau must proactively educate stakeholders and the public about how its coding and tabulation schemes for the 2024 SPD 15 categories may lead to apparent demographic shifts to prevent potential misinterpretation of such changes. Given the likely increase in the number of people reported as "more than one race or ethnicity," the Bureau must be very clear about when new coding and tabulation procedures, rather than actual demographic change, are likely the primary cause of such shifts.

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Leveraging 2027 ACS implementation for further research:

Full implementation of the updated question format and minimum categories on the 2027 ACS will also be critical to understanding how the question performs in a large-scale data collection. As noted in our comments on the proposed 2030 Code List³ and comments submitted to the November 2024 meeting of the Census Bureau National Advisory Committee on Racial, Ethnic, and Other Populations⁸, the Bureau should leverage implementation of the SPD 15 question format on the ACS and other surveys to conduct ongoing research on the updated question's performance. In particular, we urge the Census Bureau to use implementation on the 2027 ACS to evaluate how well the detailed checkboxes and write-in examples in the revised question format capture respondent intent. The Bureau must prioritize consultation with stakeholders throughout this research to better understand how specific groups, particularly Afro-Latino, MENA, and multiracial/multiethnic respondents, interpret and respond to the updated question. The Bureau should then use this research and stakeholder input to develop robust guidance for the public about the updated question in advance of its rollout on the 2030 Census.

The Bureau should also leverage implementation of the updated question format on the ACS to further evaluate its coding and tabulation schemes and better understand how data users interact with data collected through the revised question. The results of such research will allow the Bureau to further refine guidance for data users on tabulation and bridging before the 2030 Census. We call on the Bureau to carry out these and other research recommendations provided in our previous comments on the proposed 2030 Code List as it implements the updated race and ethnicity question on the 2027 ACS.

2. We support the Census Bureau's proposal to introduce an internet self-response option to the PRCS data collection operation.

Five-year PRCS data between 2019-2023 show that the percentage of households in Puerto Rico with broadband internet access rose from 56.2 percent to 76.7 percent.⁹ Providing an internet self-response option will make it easier for many households and group quarters residents to respond, likely increasing self-response rates, improving data quality and representativeness, and improving the efficiency of survey administration. Nevertheless, in light of the remaining gaps in broadband access in Puerto Rico, we also underscore the need to continue providing a paper response option and strong questionnaire assistance programs to support households in self-responding to the PRCS. The Census Bureau must also ensure robust follow up with non-responding households to ensure that PRCS data are representative of households that have limited broadband access or other barriers to self-response. The Census Bureau must engage in ongoing consultation with local stakeholders to mitigate these barriers and ensure the successful rollout of the internet self-response option.

3. We urge the Census Bureau to publish its research evaluating the feasibility of adding sexual orientation and gender identity measures to the American Community Survey.

Timely publication of this work and information about additional plans would uphold the Bureau's longstanding commitment to scientific integrity, transparency, and evidence-based decision-making. Because this research was funded by Congress and conducted in the public interest, releasing it is also a matter of public accountability. Publishing available findings would allow researchers, policymakers, and communities to better understand the evidence base and support informed dialogue about the future of federal data collection.

4. We call on the Census Bureau to proactively consult disability stakeholders about ways to enhance the quality and usefulness of ACS disability data.

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We support the Bureau's decision to halt changes proposed in 2024 to ACS questions on disability status in response to feedback from disability stakeholders.^{10,11,12} However, the Bureau must follow this important first step by proactively consulting a wide range of disability stakeholders, including disability advocates and those with relevant lived experiences, to better understand and address disability data needs¹³, as it has previously committed to doing.¹⁴

In relation to both the points on SOGI and disability data collection above, the Bureau should also provide greater transparency and opportunities for meaningful stakeholder engagement throughout the decision-making process for adding or modifying questions on the ACS.

Thank you for your consideration of our views on these important issues related to the collection of American Community Survey data. We look forward to continuing to engage with the Census Bureau on these important issues. If you have any questions about these comments, please contact Meeta Anand, senior director of the census and data equity program at The Leadership Conference on Civil and Human Rights, at anand@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
The Leadership Conference Education Fund
Asian Americans Advancing Justice – AAJC
NALEO Educational Fund

Actionable Intelligence for Social Policy (AISP)
Arab American Institute (AAI)
Asian & Pacific Islander American Health Forum (APIAHF)
Asian and Pacific Islander American Vote (APIAVote)
Association of Population Centers
Association of Public Data Users
Big Uce Youth Outreach
Black Lives Matter OKC
Black Researchers Collective
California Pan-Ethnic Health Network
Center for Racial & Disability Justice
Center for Urban Research, CUNY Graduate Center
Citizens' Committee for Children of New York
Coalition for a Healthier Frederick County
Coalition for Asian American Children and Families (CACF)
Coalition On Human Needs
Common Cause
Council for Minnesotans of African Heritage
Council of Michigan Foundations
Disability Rights Education and Defense Fund (DREDF)
Empowering Pacific Islander Communities (EPIC)
Fair Count
Forefront (IL)
Georgia Equality

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Georgia Muslim Voter Project
Georgia Redistricting Alliance (GRA)
glisten
Groundworks New Mexico
Hispanic and Immigrant Center of Alabama
Hispanic Federation
Johns Hopkins Disability Health Research Center
Labor Council for Latin American Advancement (LCLAA)
League of Women Voters of the United States
MACS 2030 - Minnesotans for the American Community Survey & 2030 Census
Maryland Center on Economic Policy
Migrant Equity Southeast
Minnesota Council on Foundations
Movement Advancement Project
National CAPACD- National Coalition for Asian Pacific American Community Development
National Council of Asian Pacific Americans
National Health Law Program
National Partnership for Women & Families
National Urban League
NC Counts Coalition
New York Civic Engagement Table
Oklahoma Institute for Child Advocacy
Pacific Community of Alaska
Pacific Islander Collective San Diego (PICSD)
Pacific Islander Community Association of Washington
Population Association of America
Project On Government Oversight
Rep GA Institute
Southeast Asia Resource Action Center (SEARAC)
State Voices
T.I.A. Through it All
The Children's Agenda
Union for Reform Judaism
UPICEC
Voices for Racial Justice