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Sheleen Dumas
Departmental PRA Compliance Officer
Office of the Under Secretary for Economic Affairs
Department of Commerce

RE: May 14, 2026 30-Day [Federal Register Notice](#) on the American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), FR Doc. 2026-09582

Dear Ms. Dumas,

The Census Quality Reinforcement Task Force (CQR), joined by 29 organizations and 32 individual signers, submits these comments in response to the Census Bureau's 30-day Notice published in the *Federal Register* on May 14, 2026 (91 FR 27241), regarding revisions to the American Community Survey (ACS) and Puerto Rico Community Survey (PRCS).

CQR is a non-partisan, multi-disciplinary learning community for research, education, and coordination around decennial census data quality and fitness for use. Our members represent a broad range of expertise and experience, united by a shared commitment to census data quality.

These comments draw on the Census Bureau's published research record, advisory committee findings, and the technical record developed through prior *Federal Register* proceedings related to Office of Management and Budget (OMB) Statistical Policy Directive No. 15 (SPD 15).

The decennial census has collected race information since the first count in 1790, and the specific categories and methods of collection have changed numerous times across more than two centuries. The 2024 revisions to SPD 15 represent the most recent such change, grounded in extensive federal research and testing over more than two decades. These revisions were adopted following a deliberative OMB-led process that included the Federal Interagency Technical Working Group on Race and Ethnicity Standards and extensive public engagement, including *Federal Register* comment, listening sessions, virtual town halls, and Tribal consultation.

These comments address two related matters: (1) the research and operational basis for implementing the 2024 SPD 15 in the 2027 ACS; and (2) a program change described in the supporting statement submitted to OMB that is not reflected in the 30-day *Federal Register*

Notice, and the related question of whether the March 27, 2026 OMB bulletin alters the 2024 SPD 15 implementation timeline. Based on the above points, the updated race and ethnicity standards should be implemented in the 2027 ACS, consistent with the Census Bureau's published research record, OMB's deliberative revision process, the public comment record from earlier *Federal Register* Notices, and the Census Bureau's own implementation analysis.

I. The Research Record and the 2030 Census Timeline Support Proceeding with 2024 SPD 15 Implementation in the 2027 ACS As Originally Proposed

In November 2024, the Census Bureau publicly confirmed its decision to implement the 2024 SPD 15 in the 2027 ACS data collection cycle. The Census Bureau explained that it considered cost, risk, and benefit tradeoffs and evaluated whether 2026 or 2027 implementation better balanced operational readiness with data quality objectives, ultimately selecting 2027.¹

The current September 2029 data collection implementation timeline referenced in OMB SPD 15 guidance is a relevant operational constraint. ACS data collection for a given cycle begins in January of that year. Deferral to 2028 could result in first 1-year estimates in September 2029, with no time for course correction prior to implementation of SPD 15 in the 2030 Census, while deferral to 2029 would likely produce first estimates in September 2030, too late to inform decennial Census operations. Even one year of deferral beyond the Bureau's 2027 target reduces available time for implementation testing and evaluation before the current 2029 implementation benchmark, compresses preparation time before the 2030 Census enumeration, and extends the period during which documented measurement limitations of the 1997 framework continue to affect federal demographic data. ACS 5-year estimates aggregate data across five consecutive collection years, and their analytical value depends on consistent questionnaire content within each window. Implementation in 2027 produces a 2027-2031 5-year window that uses a single, consistent question spanning both sides of the 2030 Census. Each year of deferral beyond 2027 narrows that window, risks creating mid-window discontinuities in the 5-year series that bridge the 2030 Census, and reduces the Bureau's operational experience with the updated question before the decennial enumeration.

The 60-day Notice (90 FR 59485), published in December 2025, generated a significant public comment record reflecting broad support for proceeding with the implementation of SPD 15 in the 2027 ACS. The earlier 2024 proceedings on ACS implementation timing (89 FR 57124) similarly reflected broad public support across federal data users and stakeholder communities for proceeding with implementation on a timeline consistent with 2027. The CQR Task Force asserts that this combined public record is relevant for OMB's review of the current Census Bureau's Information Collection Request.

A. Summary of the Research Record

¹ The Bureau further explained that it had conducted "an assessment of cost, risk, and benefit," evaluated implementation in either the 2026 or the 2027 ACS, and weighed "the amount of time and resources needed to implement the change accurately" alongside work on "critical projects to modernize operations." The Bureau also stated that it had considered "federal and nonfederal stakeholder feedback" in reaching its decision. U.S. Census Bureau (2024, November), "[Implementation of SPD 15 in the American Community Survey](#)," Random Samplings Blog.

The empirical basis for the 2024 SPD 15 revision is well established through more than two decades of Census Bureau testing. The CQR summarizes the principal findings below.

The 2010 Alternative Questionnaire Experiment (~500,000 housing units) compared combined and separate question formats for race and Hispanic origin. It found that a combined format was associated with reduced item nonresponse and decreased Some Other Race selection, findings that initiated the Bureau's sustained research program into combined question design.

The 2015 National Content Test (~1.2 million housing units) was the largest census content test the Bureau had ever conducted. Key findings relevant to the proposed ACS revision include:

- Transitioning to a combined question with detailed checkboxes reduced Some Other Race responses to approximately 1 percent, a substantial reduction from the two-question format.
- When a Middle Eastern and North African (MENA) checkbox was available, 79 percent of MENA-origin respondents selected it. The proportion reporting only "White" fell from 85.5 percent when no MENA category was offered to 20 percent when a MENA checkbox was included.
- There were no statistically significant changes to distributions for the Black or African American, Asian, or Native Hawaiian and Pacific Islander categories between formats.

The 2016 ACS Content Test produced results consistent with the 2015 National Content Test within the ACS operational environment, providing program-specific evidence on the feasibility of administering the updated question format within ACS data collection procedures.

Data collected under the 1997 SPD 15 two-question format in the 2020 Census and subsequent ACS cycles exhibit persistent measurement patterns that reveal the limitations of the existing question design:

- Some Other Race reached 15.1 percent of total respondents in the 2020 Census. Census Bureau research found that more than 90 percent of Some Other Race respondents identified as Hispanic or Latino on the ethnicity question, a pattern inconsistent with the category's design as a small residual group.
- More than 43 percent of Hispanic respondents in the 2020 Census either did not report a race or were classified as Some Other Race.
- Approximately 3.5 million U.S. residents self-identified as MENA through write-in responses in the 2020 Census. Approximately 80 percent did so under the White category; approximately 16 percent selected Some Other Race. Under 1997 SPD 15 tabulation standards, most MENA write-in responses were allocated to the White category in published products, based on coding and tabulation rules in effect.

This research record formed a central component of the evidence considered in the Census Bureau's November 2024 decision to proceed with the 2027 implementation of the revised standards on the ACS. These measurement patterns have practical consequences. Race and

ethnicity data from the ACS are used in federal program administration, civil rights enforcement, public health research, legislative redistricting, and federal resource allocation. The accuracy of these applications depends on a question instrument that reliably captures respondent-expressed identity across all population groups.

II. SPD 15 Implementation Timing and ACS Operational Sequencing in the Context of the May 2026 Submission

The supporting statement describes a program change that is not reflected in the 30-day *Federal Register* Notice. The supporting statement indicates that the Census Bureau plans to continue to administer the ACS and PRCS under 1997 SPD 15 standards while extending implementation plans for the 2024 standards, in light of OMB's March 27, 2026 extension of the Action Plan submission deadline for CFO Act agencies. CQR raises this matter to address two points: the structural scope of the March 27, 2026 extension under OMB SPD 15 guidance, and the practical implications of implementation timing for ACS production sequencing.

OMB SPD 15 guidance distinguishes between the Action Plan timeline and the data collection implementation timeline as separate components of the transition framework. The latter remains defined in prior OMB bulletins, including the September 26, 2025 extension establishing September 2029 as the current deadline for implementation.

Under this framework, the supporting statement reflects continued planning activity under extended administrative milestones while maintaining existing ACS data collection standards.

Turning to the second point, the practical implications of implementation timing for ACS production sequencing follow from the structure of the survey itself. ACS implementation of revised race and ethnicity standards is constrained by the fixed annual production cycle, in which methodological changes must be incorporated prior to fielding in order to affect a given survey year's data collection and subsequent release of estimates in the Fall of the following year.

The research record on the 1997 two-question format documents persistent measurement limitations affecting comparability and classification across major population groups. In this context, the timing of transition to the updated combined question format affects the availability of standardized race and ethnicity inputs during the period immediately preceding the 2030 Census operational window.

In November 2024, following formal assessment of implementation timing alternatives and public comment, the Census Bureau announced its determination to implement the 2024 SPD 15 standards in the 2027 ACS data collection cycle. That implementation approach was reflected in the Bureau's December 2025 60-day Notice. Relative to that established implementation baseline, later deployment shifts the first availability of data collected under the updated combined question format into subsequent ACS production cycles, with corresponding effects on the timing of comparable data inputs available for early 2030 Census preparation activities.

In sum, the program change described in the supporting statement reflects an administrative adjustment to the Action Plan submission timeline. It does not, on its own terms, alter the

September 28, 2029 data collection implementation timeline or the operational considerations on which the Bureau's own November 2024 determination rested. While the extended Action Plan timeline may give the Bureau administrative latitude to defer implementation beyond 2027, the operational consequences described above, narrowing of the comparable 5-year window spanning the 2030 Census, reduced operational experience with the updated question before the decennial enumeration, and continued reliance on a question format whose limitations the Bureau's own research has documented, remain relevant regardless of that administrative latitude.

III. Conclusion

CQR submits these comments on two grounds.

First, the research record supports implementation in the 2027 ACS, consistent with the Census Bureau's prior determination following formal analysis. That record, spanning more than two decades of Census Bureau testing and independent scientific advisory committee review, remains substantively unchanged. Each year of deferral beyond the Bureau's 2027 target reduces available time for implementation, testing, and evaluation before the current 2029 implementation benchmark, narrows the window for operational preparation before the 2030 Census, and extends the period during which known measurement limitations of the 1997 framework persist.

Second, the program change described in the supporting statement is not reflected in the 30-day *Federal Register* Notice. The March 27, 2026 OMB bulletin extended the Action Plan submission timeline and stated that it otherwise made no additional changes to implementation timelines. The current September 2029 data collection implementation timeline referenced in OMB SPD 15 guidance therefore remains in effect, and the operational consequences of deferral identified above remain relevant regardless of the administrative latitude provided by the Action Plan extension.

CQR respectfully submits that the technical record supports implementation of the updated standards in the 2027 ACS, consistent with the Census Bureau's prior determination, and that no new methodological findings in the public record justify further deferral.

We appreciate the opportunity to submit these comments.

Sincerely,



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Organizations

Population Association of America
Association of Population Centers
Association of Public Data Users

IPUMS
ICPSR, The Data Consortium
CUNY Institute for Demographic Research
The Leadership Conference on Civil and Human Rights
Asian Americans Advancing Justice | AAJC
League of Women Voters of the United States
Arab American Institute (AAI)
Empowering Pacific Islander Communities (EPIC)
National Partnership for Women & Families
Fair Count
Prison Policy Initiative
Coalition on Human Needs
Movement Advancement Project
National Coalition for Asian Pacific American Community Development (National CAPACD)
National Health Law Program
Wilder Research
Voices for Racial Justice
Impact Fund
MACS 2030 - Minnesotans for the American Community Survey & 2030 Census
Asian Americans Advancing Justice Southern California (AJSOCAL)
Minnesota Council on Latino Affairs
Metropolitan Council (Twin Cities)
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APPENDIX: KEY SOURCES REFERENCED IN THESE COMMENTS

Census Bureau Testing and Research

1. U.S. Census Bureau (2013). *2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment (AQE)*. Washington, DC: U.S. Census Bureau. (~500,000 housing unit sample.)
2. U.S. Census Bureau (2017). *2015 National Content Test: Race and Ethnicity Analysis Report*. Washington, DC: U.S. Census Bureau. (~1.2 million housing unit sample.)
3. Harth, J., Buchanan, A., Breese, D., Rios, M., Shin, H.B., Heimel, S.K., and Longsine, L. (2017). *2016 American Community Survey Content Test Evaluation Report: Race and Hispanic Origin*. ACS17-RER-11. Washington, DC: U.S. Census Bureau.
4. Coritz, A., Marks, R., and Jacobs, P. (2024). *Reporting of Middle Eastern and North African Responses in the 2020 Census Race Question*. Population Division Working Paper No. 108 (POP-WP108). Washington, DC: U.S. Census Bureau.
5. U.S. Census Bureau (2024). *Examining Racial Identity Responses Among People with Middle Eastern and North African Ancestry in the American Community Survey*. CES Working Paper 24-14. Washington, DC: U.S. Census Bureau, Center for Economic Studies.
6. Arias, E., Liebler, C.A., Garcia, M.A., and Sáenz, R. (2025). "Data impacts of changes in U.S. Census Bureau procedures for race and ethnicity data." *SSM - Population Health*. PMC11783112.

Federal Register Notices and Standards

7. Office of Management and Budget (2023, January 27). Initial Proposals for Updating OMB's Race and Ethnicity Statistical Standards. 88 FR 5375.
8. Office of Management and Budget (2024, March 29). Revisions to OMB's Statistical Policy Directive No. 15. 89 FR 22182.
9. U.S. Census Bureau (2024, July 12). American Community Survey Timeline for Implementing Updated 2024 Race and Ethnicity Data Standards. 89 FR 57124.
10. U.S. Census Bureau (2024, November). "Implementation of SPD 15 in the American Community Survey." *Random Samplings Blog*. census.gov.
11. U.S. Census Bureau (2025, December 19). Agency Information Collection Activities; Comment Request; ACS and PRCS. 90 FR 59485.
12. U.S. Census Bureau (2026, May 14). Agency Information Collection Activities; Comment Request; ACS and PRCS. 91 FR 27241.
13. Office of Management and Budget (2025, September 26). Bulletin: Extension of Deadlines for SPD 15 Implementation (extending data collection implementation timeline to September 28, 2029). spd15revision.gov.

14. Office of Management and Budget (2026, March 27). Bulletin: Extension of Deadline for CFO Act Agency Action Plans on Race and Ethnicity Data. [spd15revision.gov](https://www.spd15revision.gov).

Advisory Committee Reports

15. Census Scientific Advisory Committee (CSAC) (2024, September 20). *Recommendations from the CSAC Fall 2024 Meeting*. Washington, DC: U.S. Census Bureau.

16. U.S. Census Bureau National Advisory Committee (NAC) on Racial, Ethnic, and Other Populations (2024, November). *Fall 2024 Meeting Recommendations*. Washington, DC: U.S. Census Bureau.