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RE: Docket No. USBC-2026-0628; RIN 0607-AA75 — Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions

October 12, 2026

Dear Secretary Lutnick:

The Grant Professionals Association (GPA) appreciates the opportunity to comment on the Census Bureau's proposed regulations governing residence criteria and demographic questions for the decennial census. GPA also appreciates the Bureau's extension of the public comment period through November 2, which provided additional time to solicit input from grant professionals regarding their use of Census and American Community Survey (ACS) data.

GPA represents more than 4,300 grant professionals who work across nonprofit organizations, state and local governments, educational institutions, health care organizations, and other entities that seek, administer, and evaluate public and private grant funding. Our members routinely use Census Bureau data to demonstrate community need, define service populations, identify demographic and economic disparities, develop program strategies, establish performance measures, and support applications for federal and other grant funding.

To inform these comments, GPA surveyed grant professionals regarding their use of Census and ACS data. Of 116 respondents, 115 reported using Census or ACS data in their grant work at least some of the time. Ninety-eight percent use the data to demonstrate community need, 75 percent to calculate service populations, and 50 percent to determine eligibility for funding.

GPA's comments are therefore focused specifically on the potential implications of the proposed changes for the federal grants ecosystem and for the reliability and accessibility of data used by grant applicants, recipients, and funding agencies.

Census Data Are an Important Part of the Federal Grants Infrastructure

The proposed rule acknowledges that governmental entities may use information collected through the decennial census to obtain funding but concludes that any resulting impacts from the proposed changes would be indirect and that affected information would remain available or could be obtained through other means. GPA urges the Census Bureau to examine this assumption more closely before finalizing the rule.

GPA's survey suggests that the relationship between Census data and grant funding warrants closer examination. Among the 116 grant professionals responding to GPA's survey:

- 98 percent (114 respondents) use Census/ACS data to demonstrate community need;
- 75 percent (87 respondents) use the data to calculate service populations;
- 50 percent (58 respondents) use the data to determine eligibility for funding;
- 45 percent (52 respondents) use the data to establish benchmarks or measure outcomes; and
- 16 percent (18 respondents) reported using Census/ACS data in connection with formula funding.

Respondents also reported relying on a broad range of Census information. Among the 115 respondents answering this question, 97 percent use poverty data, 95 percent use population data, 93 percent use race and ethnicity data, 84 percent use age data, 76 percent use geographic data, and 59 percent use disability data.

For grant professionals, reliable Census Bureau data are not merely informational. Federal funding opportunities frequently require applicants to demonstrate community need, define target populations, compare local conditions with state or national benchmarks, and substantiate demographic characteristics using authoritative data. Changes affecting the availability, methodology, geographic granularity, or comparability of Census data can therefore have downstream consequences for federal grantmaking even when those changes do not directly regulate grant applicants or recipients.

Member responses further indicate that Census and ACS data provide a common, authoritative baseline that allows applicants and funding agencies to work from the same information. If comparable federal data are unavailable, applicants may instead be required to assemble information from multiple state, local, proprietary, or other sources. This could increase administrative burden for applicants while making it more difficult for federal agencies to compare applications consistently and verify claims about community need.

Evaluate the Impact on Federal Grant Programs

Before finalizing the proposed regulations, GPA recommends that the Census Bureau, working with the Office of Management and Budget and federal grantmaking agencies, assess how Census-derived data are currently used throughout federal financial assistance programs. Because the Bureau has stated that the proposed residence criteria and demographic-question provisions are being proposed independently, GPA further recommends that the Bureau separately assess the federal grants implications of each proposed change.

This analysis should identify whether proposed changes could affect:

- eligibility for federal grant programs;
- formula or population-based funding allocations;
- demonstrations of community need in competitive applications;
- identification of underserved populations;
- geographic and demographic comparisons;

- program planning and needs assessments; and
- performance measures and evaluation benchmarks.

GPA member responses illustrate that these are not theoretical concerns. For example, one grant professional working with a metropolitan planning organization reported that Census population data are used to calculate each participating jurisdiction's share of the local match required for federal grant funding. Other respondents identified Census or ACS data as required or relied upon in applications involving programs administered by the Department of Housing and Urban Development, including Community Development Block Grants, as well as the Department of Agriculture, Department of Labor, Health Resources and Services Administration, Federal Emergency Management Agency, and other federal agencies and programs.

Some respondents reported explicit requirements to use Census or ACS data, while others described grant applications requiring demographic, socioeconomic, or geographic information for which Census data serve as the authoritative and consistently available source. Changes in the underlying data therefore have the potential not only to affect grant applications, but also to affect how public funds and required local contributions are distributed among communities. The Bureau should make the results of this analysis available publicly before finalizing significant changes to Census methodology or data collection.

Ensure Alternative Data Remain Usable by Grant Applicants

The proposed rule notes that demographic information may continue to be available through the American Community Survey and administrative records. GPA urges the Bureau to evaluate alternatives from the perspective of the people who use these data. Alternative sources should provide grant applicants and recipients with data that are:

1. Accessible: Grant professionals must be able to obtain and cite the information without specialized access to federal administrative datasets.
2. Geographically granular: Many grants require applicants to demonstrate conditions within particular communities, neighborhoods, census tracts, rural areas, or other small geographic units. GPA members cautioned that less granular data can obscure significant differences within counties or larger geographic areas. For small and rural communities in particular, broader averages can mask pockets of poverty, housing need, transportation barriers, or other conditions relevant to whether a community qualifies for or can compete effectively for federal assistance. Loss of granularity therefore risks making the needs of smaller populations less visible within larger geographic averages.
3. Timely: Data must be available when grant opportunities are announced and applications are due. Delayed data can leave applicants and federal agencies relying on outdated measures of community conditions.
4. Reliable and transparent: Applicants should understand the methodology underlying the data and reproduce or verify results. GPA members repeatedly described Census and ACS data as

trusted, authoritative sources used to substantiate information presented in grant applications. Maintaining a common, transparent data source also helps federal reviewers assess competing applications using consistent information.

5. Comparable over time: Grant professionals frequently use Census data to identify trends, establish baselines, and measure changes in community conditions. Interruptions in comparability can affect not only grant applications, but also post-award performance measurement and program evaluation.

GPA recommends the Bureau demonstrate that alternative data sources will meet these needs before eliminating or materially changing existing data collection.

Consider the Relationship Between Population Counts and Communities Served

GPA also encourages the Bureau to consider how proposed changes to residence criteria could affect the relationship between official population counts and the populations actually served by federally funded programs. Grant recipients frequently provide services based on community need rather than immigration status or other classifications used for Census purposes. If population measures used in federal funding decisions do not accurately reflect the populations that organizations and governments are expected to serve, funding allocations and demonstrations of need may become less accurate.

For example, a federally funded health clinic, transit system, emergency response program, school-based initiative, or homelessness program must plan for the people who use its services. If the population denominator used to demonstrate need or allocate resources differs materially from the population a recipient is expected to serve, communities may face a mismatch between federally recognized need and actual service demand.

GPA's survey responses reinforce this concern. Members described using Census and ACS data to identify and quantify needs involving poverty, housing, transportation, workforce development, education, health, and other community conditions. Several respondents specifically raised concerns about the effect that less complete or less geographically granular data could have on small, rural, and underserved communities. The Bureau should assess these downstream effects in consultation with federal grantmaking agencies and grant practitioners.

Engage Grant Professionals and Other Data Users

GPA strongly supports meaningful consultation with the practitioners who rely on federal data. Grant professionals can provide the Bureau with real-world examples of how Census data are incorporated into funding applications, formula allocations, needs assessments, program design, and evaluation. GPA's member survey demonstrates our grant professional members are significant end users of Census information and can provide practical evidence about how changes in data collection or methodology translate into grant administration, eligibility, funding decisions, and service delivery.

GPA recommends the Census Bureau engage our members, other grant professionals, and other end users before finalizing changes that could affect the availability or usability of Census-derived information.

Conclusion

GPA recognizes the Census Bureau's responsibility to administer the decennial census efficiently and accurately. At the same time, Census data has become an essential component of the nation's federal grantmaking infrastructure.

GPA's member survey provides direct evidence of this reliance: more than 99 percent of respondents use Census or ACS data in their grant work at least some of the time, and nearly every respondent uses these data to demonstrate community need. Their experiences suggest that changes to population counts, demographic data collection, geographic granularity, or data comparability could have consequences for funding eligibility, competitive grant applications, formula allocations, program planning, and evaluation.

Before finalizing these proposed changes, the Bureau should fully evaluate how changes to population counts, demographic data collection, and reliance on administrative records could affect federal funding programs and the grant professionals and communities that rely on them. The member experiences submitted by GPA also provide evidence that the proposed changes may have reasonably foreseeable effects on federal grant eligibility, competition, allocation, administration, and evaluation that warrant consideration before either proposal is finalized. GPA welcomes the opportunity to provide additional practitioner input and would be pleased to work with the Census Bureau and other federal agencies to better understand how Census data are used throughout the federal grants lifecycle.

Please feel free to contact me at mike@grantprofessionals.org if GPA can assist the Bureau in this important work.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Chamberlain", with a stylized flourish at the end.

Mike Chamberlain, MBA, CAE
Chief Executive Officer
Grant Professionals Association