November 2, 2026

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Re: Docket No. 260903-0005, RIN 0607-AA75, Department of Commerce, Census Bureau, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions

To Whom It May Concern,

Thank you for the opportunity to provide comments on the proposal to revise several parts of the proposed regulation Docket No. 260903-0005, RIN 0607-AA75, Department of Commerce, Census Bureau, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions.

My name is Kelley Kuhn, and I am the President and CEO of the Michigan Nonprofit Association (MNA), a 501(c)(3) statewide membership organization that serves Michigan's nonprofits through advocacy, training, and resources. Nonprofits are a vital partner in the census process because they serve historically undercounted and vulnerable populations and can help us achieve a fair and complete count. Nonprofits are trusted messengers with deep community relationships, and many utilize demographic data from the census to inform their work and serve their communities. The proposed changes to the 2030 Decennial Census, which eliminate certain demographic questions and change who is counted, will have lasting negative impacts on nonprofits and the communities they serve.

The United States Constitution requires the census to count all persons living in the United States.

Specifically, the Enumeration Clause of Article I, Section 2 which determines Congressional apportionment by "actual enumeration" and the 14th Amendment which

requires a count of “the whole number of persons in each state.” Any attempt to reduce the number of people counted, regardless of their immigration status, violates the intention of the census and harms individual states that stand to lose their fair share of federal funding and congressional representation.

The Decennial Census is an integral part of civic engagement, and public confidence in the Census process is essential to the integrity of our democracy.

The proposed changes to the 2030 Decennial Census will create fear among the American public and a distrust in the integrity of the data collected and provided. Without the collection of important demographic data like race, ethnicity, and sexual orientation, specific communities stand to lose critical funding, support, and recognition that is needed to support a thriving and diverse America. By eliminating demographic questions, the proposal compromises the work of nonprofits, businesses, researchers, and government who use this data to determine health disparities, guide economic development, and understand the unique needs of our communities. Additionally, any attempt to exclude people based on their immigration status creates a fear among immigrants of all statuses and further erodes efforts to count historically undercounted populations.

The census is the basis for congressional representation and the federal funding that states are entitled to receive.

Michigan receives over $62 billion per year in census-guided funding. This funding goes toward healthcare programs like Medicaid and Medicare, infrastructure, education, housing, and more. Without a fair and accurate count, Michigan stands to lose a fair share of the funding we need for essential services for our people. When essential services are underfunded, those in need look to nonprofit organizations for help and support. Additionally, the demographic data collected in the census is essential to the enforcement of laws like the Voting Rights Act and the Fair Housing Act which serve to protect fair and equal representation for all Americans. Any threat to an accurate and complete count in Michigan increases the risk of a loss in congressional representation.

The proposed changes to the 2030 Decennial Census would harm our nonprofits and the people they serve.

Across all sectors, Michigan’s nonprofit organizations utilize census data--particularly demographic data--to serve all our communities in various ways, including, but not limited to:

- Understand the population and community needs;
- Determine focus areas for needed programming;
- Support grant applications;
- Understand the demographics of the communities they serve;
- Help inform a project location or scope;
- Determine how to tailor programs to the cultural needs of specific communities;
- Analyze disparities among different populations, especially children;
- Demographic population analysis;
- Inform policymaking needs;
- Strategize land protection efforts and outreach to farmers; and
- Track health data across different races and ethnicities, including substance abuse, mental illness, and epidemic trends.

The proposed changes will result in inaccurate data that is used to understand the communities nonprofits serve resulting in:

- A misallocation of resources to communities that include areas such as education, healthcare, and emergency response;
- Fewer resources for the same or increased need;
- Inaccurate federal and state census-informed funding;
- Inability to apply for accurate resources through grants and programs;
- Inability to hire and staff nonprofits appropriately;
- Inability to strategically plan and coordinate resources such as programs and policy for a community;
- Inaccurate representation of the communities nonprofits serve in various ways, including at state and congressional levels; and
- Inability to identify and address racial, social, and other gaps and inequities.

My organization strongly opposes the proposed changes to the 2030 Decennial Census and the impact they will have on our nonprofit organizations and the communities we serve. We respectfully request that the proposed rule be withdrawn from further consideration.

Thank you,

Kelley Kuhn
President & CEO
Michigan Nonprofit Association