

NORTHWEST MUNICIPAL CONFERENCE

1600 East Golf Road, Suite 0700
Des Plaines, Illinois 60016
(847) 296-9200 • Fax (847) 296-9207
www.nwmc-cog.org



A Regional Association of Illinois
Municipalities and Townships
Representing a Population of Over One Million

MEMBERS

Antioch
Arlington Heights
Bannockburn
Barrington
Bartlett
Buffalo Grove
Deer Park
Deerfield
Des Plaines
Elk Grove Village
Evanston
Fox Lake
Glencoe
Glenview
Grayslake
Hanover Park
Highland Park
Hoffman Estates
Kenilworth
Lake Bluff
Lake Forest
Lake Zurich
Libertyville
Lincolnshire
Lincolnwood
Morton Grove
Mount Prospect
Niles
Northbrook
Northfield
Northfield Township
Palatine
Park Ridge
Prospect Heights
Rolling Meadows
Schaumburg
Skokie
South Barrington
Streamwood
Vernon Hills
West Dundee
Wheeling
Wilmette
Winnetka

President
Eric Smith
Buffalo Grove

Vice-President
Paul Hoefert
Mount Prospect

Secretary
Senta Plunkett
Wilmette

Treasurer
Scott Anderson
Barrington

Executive Director
Mark L. Fowler

October 29, 2026

Mr. George M. Cook
Director, Census Bureau
United States Department of Commerce
4600 Silver Hill Road
Designation: ADDEMO/FRN
Washington, DC 20746

Dear Director Cook:

The Northwest Municipal Conference (NWMC) 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 guide funding and planning decisions for the next decade, accuracy is critical.

We are concerned that several provisions of the proposed rule could reduce the accuracy of population counts and affect access to federal and state resources.

Concerns about the Proposed Changes

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. Although this change applies only to apportionment, it may create confusion among residents. 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, particularly among immigrant and mixed-status households. Any decline in response rates would undermine the accuracy of the count and the resources tied to the census.

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 population counts. We ask the

Bureau to further evaluate the operational and data accuracy impacts of this change and explain the rationale supporting it.

Reliance on administrative records: Increased reliance on tax, immigration, health and other administrative records raises concerns about the potential undercount of populations in our community that may not be consistently represented in those records, including low-income households, college students, non-filers and children. We request additional information regarding when these records will be used and how the Bureau will ensure accurate counts for populations with less reliable administrative data.

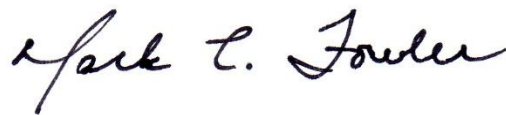
Demographic questions: The proposal would eliminate race and ethnicity questions, while making most other demographic questions optional. Accurate demographic data is essential to municipal planning and service delivery. Understanding who lives in a community gives local governments the ability to plan for current population and take into consideration future needs. The loss or reduction in the quality of this data could affect the ability to provide much needed services to residents and accurately plan for the future.

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 the population reduces resources available to the entire. Numerous state funding formulas similarly rely on accurate census data. While the Bureau distinguishes between apportionment and funding distribution, changes that discourage participation risk reducing the quality of data used for both purposes.

We respectfully ask the Census Bureau to withdraw these proposed changes. Any changes to residence criteria, data collection methods or demographic questions must not compromise the accuracy of the population counts that municipalities rely upon.

We appreciate the opportunity to comment on this proposal and would welcome the chance to provide additional information or answer any questions the Bureau may have.

Sincerely,

A handwritten signature in black ink, reading "Mark C. Fowler". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark Fowler
Executive Director
Northwest Municipal Conference