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April 20, 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 dcmd.pra@census.gov and via regulations.gov

Re: Local Update of Census Addresses (LUCA) operation (FR Doc. 2026-03073)

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 on the Local Update of Census Addresses (LUCA) Operation for the 2030 Census, described in the Federal Register Notice Docket Number USBC-2026-0001, “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Local Update of Census Addresses (LUCA) Operation.”

The Leadership Conference is the nation’s oldest, largest, and most diverse civil and human rights coalition and provides a powerful unified voice for the many constituencies we represent. Our coalition views an accurate and fair census 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 lift up 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 American Community Survey.

Accurate census data are a cornerstone of our democracy. The LUCA operation gives state, tribal, and local governments a critical opportunity to directly help ensure an accurate census by reviewing and submitting updates or corrections to the census address list. Addresses left off the list will most likely be missed in the census; thus, an accurate address list is essential for an accurate census. We support a high quality LUCA operation that gives governmental units a meaningful opportunity to ensure that households in their communities are not left out of the census. A well-designed

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LUCA operation allows local experts to leverage their knowledge so that census data better reflect their communities' realities.

The LUCA operation is also critical for historically-undercounted communities and those communities at risk of being undercounted. Historically, the census has undercounted certain populations at high rates, including communities of color, young children, renters, low-income households, and more. These undercounts can be partially traced to missing or inaccurate address information. Strong local engagement through the LUCA operation can help fill critical data gaps to better count these populations. LUCA particularly supports improved enumeration of people in hard-to-identify housing units (such as rural homes, informal units, and multi-family residences) as well as group quarters (such as college dormitories, nursing homes, and correctional facilities).

We appreciate the Census Bureau's efforts to provide stakeholders with a useful and well-considered LUCA process. We also understand the need for high-quality LUCA submissions from eligible governmental units, given the limited resources of the Census Bureau and jurisdictions. Meaningful LUCA participation plays a critical role in ensuring an accurate census address list, which will be the foundation for a complete 2030 Census.

We encourage the Bureau to continue its focus on carrying out a meaningful, robust LUCA operation, in partnership with governmental units and stakeholders. In addition, we offer the following comments on the proposed LUCA operation:

- **The Census Bureau, in concert with stakeholders, should reach out proactively to encourage governments to start preparing for LUCA now.** Given the May 2027 time stamp signaling the “beginning” of LUCA, we are concerned that some eligible governments may mistakenly conclude that they can wait until then to start preparing. The Bureau should conduct advance outreach to eligible governmental units through tools such as training webinars, workshops, and meetings with stakeholders.
 - We appreciate that the bureau has included guidance in the FRN regarding use of the Address Count Listing Files as a means of identifying – in advance – areas in their jurisdictions that are at high risk for address problems. This step helps governments use their available resources more effectively, by focusing on the most problematic areas before the address list submission period (LUCA Review) begins in October 2027.
 - We recommend that the Census Bureau develop and disseminate an information guide as soon as possible to accompany any such advance outreach efforts.
- **We strongly support proposed enhancements to the LUCA operation that help more eligible governmental units participate.** Historically, LUCA participation has been most common among eligible governmental units with the resources and robust technical expertise necessary to conduct a thorough review of both the census address list and their own address databases. Smaller governmental units, such as rural governments, and

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others without those resources and expertise were generally unable and unlikely to participate in the LUCA program, leaving them out of this important opportunity for their communities. The proposed 2030 LUCA operational plan provides opportunities for more eligible governments to participate in LUCA, as Congress intended in requiring this program. In particular, the new user-friendly online tools and the new four-month LUCA Prep period discussed in this FRN will help more governments participate. We strongly support these improvements.

- **We support the expansion of the time period for LUCA Review from the previous four months to six months.** This gives governments more opportunity to conduct thorough and targeted reviews of their address lists and housing stocks, and to submit meaningful corrections for the Bureau’s consideration.
- **We urge the Census Bureau to highlight for eligible governments the importance of including group quarters addresses as part of LUCA preparations and submissions.** In past censuses, the Bureau has faced challenges enumerating individuals who live in group quarters — including college students, incarcerated people, patients in nursing facilities, and more. Local input is an essential tool to ensure a full and accurate understanding of relevant group quarters.
- **At all points in the execution of LUCA, and in tandem with stakeholders, the Census Bureau must reinforce and elevate messages about the Title 13 confidentiality protections afforded to address and housing unit information that is part of the LUCA process.** Title 13 confidentiality is of the utmost importance for the 2030 Census, as for the integrity of all censuses. This communication effort should include a clear statement that any new or updated address information submitted by tribal, state, and local governments to the Census Bureau through the LUCA program is guaranteed the same Title 13 protections as address data provided by the Census Bureau. The statement should highlight the prohibition against sharing address information with other federal agencies, or any state and local agencies, and the prohibition against the Census Bureau’s use of the information for any purpose other than the improvement of the census address list and/or the production of anonymized statistics. The Bureau must also emphasize that Title 13 protections apply to information shared with any representative of an eligible governmental unit who is privy to any information supporting their review, updating, and correction of the census address list.
- **The Census Bureau should use its influence and networks to promote collaboration that ensures governments with limited resources can successfully rely on larger governmental units for assistance in the LUCA process.** While the Bureau’s efforts to expand LUCA participation (such as accessible online tools) will help governments participate, many communities may still need to “collaborate with larger governments” to participate in LUCA. For example, governments in rural areas and tribal governments may choose to collaborate with states, counties, regional councils, and similar larger

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units. The Bureau should actively encourage this collaboration through coordinated and proactive outreach, which should include the Bureau's State Data Centers (SDC), Federal-State Cooperative Program on Population Estimates (FSCPE), Census Information Centers (CIC), and Tribal Affairs Office (TAO). The Bureau should also appoint and publicly announce Regional Office staff as soon as possible to encourage and monitor cooperation between area governmental units.

- **We urge the Census Bureau to provide details on who governmental units may appoint as “additional reviewers” to assist with the LUCA operation.** While we assume that additional members of the liaison's tribal, state, or local government are likely to be involved in LUCA reviews, a common question among stakeholders is the extent to which members of community based organizations, civic groups, universities, and commercial vendors can be tasked by a government to assist with the review of the address list. The Census Bureau should address this question clearly in its final LUCA operational plan.
- **We recommend that the bureau maintain a real-time running list, available to the public online, of governmental units participating in the LUCA program.** This would assist with encouragement and education efforts around the LUCA process.

Thank you for your consideration of our views on these important issues related to the LUCA operation for the 2030 Census. We appreciate this opportunity to provide comments and look forward to continued engagement to ensure a successful 2030 Census. 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

Abrazar, Inc.
Arab American Institute (AAI)
Asian and Pacific Islander American Vote (APIAVote)
Association of Population Centers
Association of Public Data Users
Census Quality Reinforcement (CQR) Task Force
City of New Orleans
Coalition on Human Needs
Demographic Analytics Advisors
Empowering Pacific Islander Communities (EPIC)

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Equality California
Fair Count Inc.
Impact Fund
Johns Hopkins Disability Health Research Center
League of Women Voters of the United States
MACS 2030 - Minnesotans for the ACS and 2030 Census
Minnesota Council on Foundations
Movement Advancement Project
N.Y. Elections, Census & Redistricting Institute
National Network for Arab American Communities
New York Civic Engagement Table
Our Children Oregon
Population Association of America
Project On Government Oversight
Services, Immigrant Rights and Education Network (SIREN)
Silver State Equality