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Maya Wiley

June 15, 2026

Sheleen Dumas  
Departmental PRA Compliance Officer  
Office of the Under Secretary for Economic Affairs  
U.S. Department of Commerce  
Washington, DC 20230

Re: The American Community Survey (ACS) and Puerto Rico Community Survey (PRCS)  
(FR Doc. 2026-09582)

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 in response to this information collection, published in *Federal Register* Notice Docket Number USBC-2026-09582 (91 FR 27241), "Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; The American Community Survey (ACS) and Puerto Rico Community Survey (PRCS)," published on May 14, 2026.

The Leadership Conference is a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the rights of all persons in the United States. The Leadership Conference Education Fund builds public will for state and federal policies that promote and protect the civil and human rights of all persons in the United States. The Leadership Conference's longstanding role as a Census Information Center has allowed us to underscore 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 ACS. We write today to reiterate the importance of implementing SPD-15, and voice our concern that the Census Bureau has not contemplated implementing the revised race and ethnicity question standards in the ACS.

As we noted in our comments dated 4.27.23, "the standards allow all residents of our country to be included in the fabric of our society by choosing how they identify and see themselves. The resulting portrait of our nation and communities allows government agencies, businesses, nonprofits, health care professionals, and researchers to evaluate access and outcomes in the nation's social and economic institutions and to ensure equal opportunities that lift the quality of life for all." We have attached the full comments along with this letter, as well as our comments in response to Federal Register Notice Docket Number USBC-2025-0203, "Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; American

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Community Survey and Puerto Rico Community Survey.” We stand by our recommendations in our prior comments and urge the Census Bureau to swiftly take action in implementing SPD-15 in the 2027 ACS and PRCS questionnaires.

While we believe that implementing SPD-15 is good policy, this is also unequivocally good science. The Census Bureau conducted extensive research to inform the 2024 SPD-15 Standards, backed by years of research and notice and comment. To be clear, the science and recommended guidance has not changed. Full implementation of the updated question format and minimum categories on the 2027 ACS will be critical to understanding how the questions perform in a large-scale data collection. In particular, we urge the Census Bureau to use implementation on the 2027 ACS to evaluate how well the detailed checkboxes and write-in examples in the revised question format capture respondent intent. Having the data available from the 2027 ACS will allow the Census Bureau to better prepare for the 2030 Census as well. The full implementation of SPD-15 is necessary to uphold and continue the Census Bureau’s longstanding commitment to scientific integrity, transparency, and evidence-based decision-making.

In addition to maintaining the highest standards of scientific objectivity and statistical rigor, failing to implement SPD-15 would go against the overwhelming public support for SPD-15 implementation. In the Federal Interagency Technical Working Group on Race and Ethnicity Standards report, “Annex 4. Communications and Outreach Team Final Report (OMB-2023-0001-20266),” the report found that the majority of the 20,255 comments responding to the 2023 SPD-15 FRN supported SPD-15 implementation, with the majority advocating for the combined question, and nearly all comments supporting the MENA category, and the majority of comments advocating for data disaggregation. There was also strong support for SPD-15 Implementation within the Asian American community, with 98% of Asian American organizations writing in favor of SPD-15 Implementation.

This public support was also evident in subsequent comments, such as the Federal Register Notice Docket Number USBC-2025-0203. None of the submitted comments explicitly opposed the adoption of SPD-15, with more than 82% specifically supporting the adoption of SPD-15. and the remaining comments were focused on other parts of the FRN, without mentioning and did not mention SPD-15.

Moreover, the stakeholders who submitted comments supporting the implementation of SPD-15 included a wide range of stakeholders, including academic and other data experts and civic and community leaders who have a deep understanding of historically undercounted communities’ experience with the Census. By failing to implement SPD-15, the Bureau will both lose the benefit of these stakeholders’ extensive knowledge and will undermine public trust in the transparency and accountability of the agency’s stakeholder consultation process. Ultimately, this will dramatically impair our nation’s ability to provide complete, accurate and reliable data about our country and all of its population groups.

We urge the Census Bureau to adopt the 2024 SPD-15 standards in a timely manner beginning with the 2027 American Community Survey and Puerto Rico Community Survey.

We appreciate this opportunity to provide comments and look forward to continued engagement as these important updates are implemented. For any questions, please contact Meeta Anand, senior program director of census and data equity at The Leadership Conference on Civil and Human Rights, at [anand@civilrights.org](mailto:anand@civilrights.org).

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Sincerely,

The Leadership Conference on Civil and Human Rights  
Asian Americans Advancing Justice | AAJC  
NALEO Educational Fund

AAPI NJ  
Arab American Institute (AAI)  
Association of Population Centers  
Association of Public Data Users  
Census Quality Reinforcement (CQR) Task Force  
Coalition for a Healthier Frederick County  
Coalition on Human Needs  
Common Cause  
COOLJC Region 8 SJEREC  
Disability Rights Education and Defense Fund (DREDF)  
Equality California  
League of Women Voters of the United States  
MACS 2030 - Minnesotans for the ACS and 2030 Census  
MALDEF (Mexican American Legal Defense and Educational Fund)  
National Coalition for Asian Pacific American Community Development (National CAPACD)  
National Council of Asian Pacific Americans (NCAPA)  
National Network for Arab American Communities (NNAAC)  
National Partnership for Women & Families  
National Redistricting Foundation  
New York Civic Engagement Table  
PFLAG National  
PML Agency  
Population Association of America  
Prison Policy Initiative  
Southeast Asia Resource Action Center (SEARAC)