



SAFE STATES

An Alliance to Strengthen the Practice of Injury and Violence Prevention

October 7, 2025

Daniel Sweeney
Deputy General Counsel for Economic, Statistical and Regulatory Affairs
Office of the General Counsel, Department of Commerce
4600 Silver Hill Road
Washington, DC 20746

Dear Mr. Sweeney,

The Safe States Alliance appreciates the opportunity to provide comment on the Department of Commerce and Census Bureau's proposed changes to the decennial census, 91 FR 57524 (Sept. 10, 2026). The proposed rule would make significant alterations to the 2030 Census, including the proposed omission of noncitizens without lawful permanent residence and prohibiting the inclusion of questions relating to race, ethnicity, and sexual orientation.

The Safe States Alliance is a national nonprofit organization with more than 800 members representing all 50 state health department injury and violence prevention programs. Our members rely on accurate and complete census data to understand the scope of injury and violence, identify emerging trends, and implement effective prevention strategies.

Census population counts supply the denominators used to calculate rates of suicide, homicide, overdose, and other injuries. Centers for Disease Control and Prevention (CDC) data systems, including the National Violent Death Reporting System (NVDRS) and the State Unintentional Drug Overdose Reporting System (SUDORS), depend on those denominators. Inaccurate or incomplete population counts can distort injury and violence rates, making it harder to assess whether prevention strategies are working and decide where to implement prevention programming.

Given that this proposal would undermine the information on which injury and violence prevention efforts depend, the Safe States Alliance urges the Department of Commerce and the Census Bureau to withdraw the proposed rule.

1. Proposed Residence Criteria

The proposed rule would make significant changes to how a person's "usual residence" is determined, including establishing a residence criteria that would only include U.S. citizens and foreign citizens who are lawful permanent residents in apportionment counts. It would

exclude “all other citizens of foreign countries,” including many visa holders, refugees, asylum seekers, students, and temporary workers.

Excluding these residents from apportionment counts would make them less visible in the population data used to calculate injury and violence rates. In communities with large immigrant populations, injury and violence rates may be overstated and produce unreliable information.

Public health agencies rely on this data to identify where harm is concentrated, compare outcomes across communities, and direct prevention resources where they are needed most. Distorted rates could therefore shift prevention funding toward places where apparent need is inflated and away from communities whose needs are understated.

Accurate and complete apportionment data is therefore essential to determining the true burden of injury and violence, evaluating prevention efforts fairly, and allocating resources according to actual community needs.

2. Proposed Restrictions on Demographic Questions in the Decennial Census

The proposed rule would also prohibit questions about race, ethnicity, or sexual orientation on the decennial census short-form questionnaire and other questionnaires used to enumerate the population.

Demographic information from the decennial census provides a crucial benchmark for measuring disparities; without it, public health experts would be less able to identify gaps in health outcomes or determine which groups face elevated risk.

The proposed restrictions would also limit public health agencies’ ability to evaluate whether prevention efforts are reducing disparities over time. Agencies need consistent demographic information to track changes across populations and determine whether programs are reaching the communities they are intended to serve. Without complete data, changes in injury and violence rates may reflect gaps in measurement rather than meaningful changes in outcomes. This can make it more difficult to determine which prevention strategies are working and where future investments should go.

Removing demographic questions would not eliminate disparities in injury and violence; it would only make them more difficult to identify and address through evidence-based prevention efforts.

Recommendations

The Safe States Alliance respectfully requests that the Department of Commerce and the Census Bureau withdraw the proposed rule and reject the proposed residence criteria and exclusion of demographic questions.

A complete and accurate census is foundational to the nation's injury and violence prevention efforts. We therefore urge the Department of Commerce and the Census Bureau to preserve inclusive population and demographic data.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sharon Gilmartin', with a stylized, flowing script.

Sharon Gilmartin
Executive Director