NEW YORK

PUBLIC COMMENTS THROUGH NOVEMBER 13, 2026

WHAT THE PROPOSED RULE SAYS Published Sept. 10, 2026 (91 FR 57524). Comments closed Nov. 2, 2026.

Who is counted, and where (Part 60). People who are not U.S. citizens or green card holders, including students, workers on visas, refugees, and asylum seekers, would not be counted for apportionment (§ 60.4). Everyone else would be counted where they spent the most days from Jan. 3 to April 1, matched to tax records (§ 60.2, § 60.6).

What the census asks (Part 70). The form could not ask about race, ethnicity, or sexual orientation, and only sex, date of birth, and household relationship would be required (§ 70.2). Demographic data could not be published if privacy protection would add any uncertainty to state or national counts (§ 70.3).

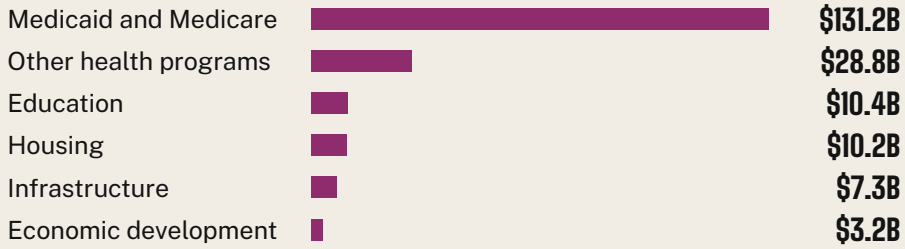
What it would mean: less accurate, less usable census data across the country.

WHAT IS AT STAKE FOR NEW YORK

$186.3 billion

of federal spending guided by census data went to New York in fiscal year 2023, through 371 programs. That is the 2nd largest of 50 states and DC.

WHERE THAT MONEY WENT



POGO's rough rule of thumb: missing 1% of New York's residents could shift about **$1.9 billion a year** until the next census. The real effect varies by program and by who is missed. Some programs count in more than one category. **SOURCES:** Sean Moulton and Janice Luong, "Census Matters: Why an Accurate Count Is Essential to Funding Our Communities" (POGO, Oct. 28, 2025) and its New York fact sheet; Janice Luong and Sean Moulton, "How to Use POGO's Census Funding Data" (POGO, Mar. 19, 2026).

WHAT NEW YORK TOLD THE CENSUS BUREAU

6,697 comments came from New York. **99% opposed the rule**. Of all comments that name a state, 97% opposed; of all comments, 88%.

6,697
COMMENTS
2nd most of 50 states and DC

99%
OPPOSED THE RULE
6,607 comments opposed; 86 supported

34
PER 100,000 RESIDENTS
17th highest of 50 states and DC; the median is 28

935
ASKED FOR MORE TIME
to comment on the rule

ISSUES NEW YORK COMMENTERS RAISED MOST

Share of comments raising each issue. New York · All comments that name a state



HOW TO READ THESE NUMBERS
Every published comment counts once, including each copy of a form letter. Position is inferred from each comment by the comment analysis. State is inferred from the comment text and is subject to error. About 62% of all 148,532 comments name a state, so state totals undercount. Most comments that support the rule (85%) name no state, so New York is compared with all comments that name a state. The government and organization lists on page 2 are a sample, not everyone who commented; each was checked by reading the comment. Quotes are exact; individuals are described as they describe themselves.

A SAMPLE OF NEW YORK GOVERNMENTS AND OFFICIALS WITH OPPOSING COMMENTS

ATTORNEY GENERAL

Signed multistate letters asking for more time (Sept. 21) and opposing the rule (Nov. 2)

STATE

2 New York State Assembly members

Members of the New York State Black, Puerto Rican, Hispanic and Asian Legislative Caucus

Members of the New York State Legislature

New York State Department of Environmental Conservation

New York State Department of Health

New York State Energy Research and Development Authority (NYSERDA)

New York State Senator, 56th District

TRIBAL NATIONS

Saint Regis Mohawk Tribe

Seneca Nation of Indians

Shinnecock Indian Nation

ASSOCIATIONS OF LOCAL GOVERNMENTS

New York State Association of County Health Officials

New York State Association of Metropolitan Planning Organizations (14 MPOs)

LOCAL GOVERNMENTS AND REGIONAL AGENCIES

City of Ithaca (mayor and city manager)

City of New York

City of New York Comptroller

New York City Council

New York City Independent Budget Office

Westchester County (county executive and board of legislators)

A SAMPLE OF NEW YORK ORGANIZATIONS WITH OPPOSING COMMENTS

Philanthropy New York

The New York Community Trust

NY Funders Alliance

Citizens' Committee for Children of New York

Schuyler Center for Analysis and Advocacy

Roots & Representation: The New York State Census Alliance

New York Immigration Coalition

Her Justice

Finger Lakes Independence Center

National groups based in New York also wrote in: Foundation for Child Development.

IN THEIR WORDS: OPPOSING COMMENTS FROM NEW YORK

> *"New York State employees 40,000 to 80,000 farm workers every year, many of whom are seasonal workers and would be undercounted under the proposed changes."*

New York State Department of Health
estimates rule would undercount state by 4.6%–9.2% · Comment 130352

> *"If that fear keeps them from responding, or if whole communities vanish from the data, schools will be funded as if some students were not there."*

Educator serving immigrant students in Queens
writing as an individual · Comment 148317

> *"The proposed rule would exclude millions of residents, including many who are lawfully present in the United States. It would also compromise effective resource allocation, thereby negatively impacting the health, educational, and economic outcomes of our youngest New Yorkers."*

New York City Council
legislative body for New York City · Comment 140698

> *"Many New Yorkers spend the winter months outside the state while maintaining their primary residence, employment, health care relationships, and community connections in New York."*

New York State Association of County Health Officials
represents local health departments across the state · Comment 24413

> *"Census counts shape my kids schools, the infrastructure like busses, subways, roads, hospitals, parks in our community."*

Parent of two in Jackson Heights, Queens
writing as an individual · Comment 7341

> *"Excluding students attending local institutions like the University of Rochester and RIT, as well as temporary workers and refugees living in our community, will artificially shrink Rochester's official population baseline."*

Resident of Rochester and Monroe County
writing as an individual · Comment 73806

Sources: public comments on docket USBC-2026-0628 at regulations.gov, as read and labeled by the analysts' comment analysis; position and state are inferred from each comment's text and are subject to error. Federal funding: Project On Government Oversight (POGO), Census Matters, Oct. 28, 2025 (fiscal year 2023 data). Prepared by Hands Off Our Census. Run Nov 23, 2026, 3:05 PM ET.

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