



CITY OF HARRISONBURG CITY MANAGER

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October 27, 2026

George Cook, Director
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

RE: Comments on Proposed Residence Criteria and Proposed Regulations for Demographic Questions for the Decennial Census, Docket No. 260903-0005; RIN 0607-AA75

Dear Director Cook,

The City of Harrisonburg respectfully opposes the U.S. Department of Commerce's proposal to alter the demographic questions and residence criteria for the Decennial Census. These proposed changes will categorically exclude a significant share of our City population. Harrisonburg is home to two Universities and has been a refugee resettlement community since 1988. Our local employers and Universities sponsor many individuals on H-1B, H-2B, and student visas. We are highly concerned about the impact of an undercount of our population on Federal funding allocations to our locality. Nearly all local government services cannot be restricted to only serve those with U.S. Citizenship or lawful permanent residency, making it critical for Federal grants to local governments to be based on our actual population.

Federal agencies use Decennial Census data to determine allocations and eligibility for many Federal grant opportunities. By U.S. Census Bureau's own accounting in June 2023, 353 assistance listings used Decennial Census Programs data in whole or in part to distribute more than \$2.8 trillion in funds during fiscal year 2021.¹ The City's eligibility for grants or the value of these grants may decline as a result of an undercount of our true population. Some Federal funding opportunities commonly accessed by the City include: Assistance to Firefighters Grant, Edward Byrne Memorial Justice Assistance Grant Program, Community Development Block Grant, Federal Transit Formula Grants, and Federal Transit Capital Investment Grants. Other agencies significantly supported through local taxpayer funding that could see impacts to their federal funding include the Harrisonburg City Public Schools and the Harrisonburg-Rockingham Department of Social Services.

The Federal government's counting of our entire City population is essential to ensure Census-data based funding opportunities acknowledge that all residents, regardless of residency status, are served by City services. We strongly encourage the U.S. Census Bureau to not enact the rule change as proposed.

Sincerely,

Ande Banks
City Manager

¹ <https://www.census.gov/library/working-papers/2023/dec/census-data-federal-funds.html>