NATIONAL ASSOCIATION OF REALTORS®

October 28, 2026

U.S. Department of Commerce
Secretary Howard Lutnick
1401 Constitution Avenue NW
Washington, D.C. 20230

RE: Docket No. USBC-2026-0628, RIN 0607-AA75; Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions

Dear Secretary Lutnick:

On behalf of the over 1.4 million members of the National Association of REALTORS® (NAR), we thank the Bureau for its work, and NAR respectfully submits this comment in response to the Bureau's proposed rule change for the upcoming decennial census. The proposed rule would bring major changes to the upcoming 2030 decennial census with the potential to impact future decennial censuses. NAR supports policies that promote and advance housing, homeownership, and the broader economy.

The National Association of REALTORS® is America's largest trade association, including NAR's real estate institutes, societies, and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,200 local associations or boards and 54 state and territory associations of REALTORS®. The real estate industry makes up roughly 18 percent of the United States gross domestic product (GDP), which amounts to approximately $5.6 trillion. The real estate industry adds significantly to the overall economy, and accurate data is imperative for the industry to thrive. This includes accurate, complete, and comprehensive census data.

NAR has previously worked with the Census Bureau as a partner to help socialize and promote the 2020 census along with other economic surveys. NAR values this partnership and believes that continued collaboration and

coordination are imperative for economic growth, development, and the expansion of housing opportunity throughout the country. Data accuracy and integrity are priorities given that the data both helps both the public and private sectors. Many small business owners, including REALTORS®, use the data as well and look to the Census Bureau to be an authoritative source for accurate data.

Census data is extremely useful for the real estate industry, especially in an environment where housing attainability and affordability remain challenging for many households. Census data helps NAR better understand housing trends, household formation, homeownership rates, migration, and local housing needs. This data also helps identify where housing demand is growing and where additional housing may be needed. Additionally, developers, lenders, and other real estate professionals use census data to underwrite projects, set pricing, to evaluate neighborhoods and for economic forecasting.

As the Bureau considers the proposed changes to the decennial census, NAR encourages continued attention to the availability, comparability, and continuity of Census data over time. Maintaining reliable and consistent data is important for understanding population changes and housing needs across communities. NAR encourages the Bureau to consider maintaining certain demographic questions on the census questionnaire including race, ethnicity, and sexual orientation data. Many industries use and source this data from the Bureau in seeking to understand market demographics and needs. This data is critical for businesses to better understand their clients and customers.

The proposed rule also seeks to adjust and change the current population count to include only American citizens and lawful permanent residents with the potential inclusion of a citizenship question on the decennial census. This proposed rule change will impact apportionment and federal funding in communities. Small business owners and the business community broadly rely heavily on federal funding and support based upon a full and complete population count of all individuals in the United States at the time of the decennial census. Changing how the population count is taken and adding a

citizenship question may have a chilling effect, while also negatively impacting how sectors can use the data and may lead to a very inaccurate census count. NAR encourages the Bureau to carefully reconsider its proposed change and consider how this change is likely to impact state and local governments, the business community, the real estate community, and the broader economy. This proposed change will also impact the Community Development Block Grants (CDBG) and will also impact transit funding.

Census data that provides a complete and accurate count of the population is important because the Census is used for redistricting, federal funding, apportionment and congressional representation, housing, business and economic planning, and community and government planning. NAR encourages the Bureau and the Commerce Department to continue considering the importance of reliable Census data as it considers the proposed rule and makes any major changes to the current decennial census. Additionally, any final rules or changes should support the U.S. economy, businesses, and all industries. NAR appreciates the Bureau's continued efforts to maintain the accuracy, consistency, and comparability of Census data over time, particularly at the local level. All data collected should aim to provide accuracy and should be comprehensive to help support homeownership, and housing stability.

Thank you for your work, and please continue to consider NAR as a partner. We welcome the opportunity to continue to work with the Bureau now and in the future to help socialize the decennial census and the American Community Survey. We trust that the Bureau is also committed to data quality, accuracy, and completeness in protecting the data. Thank you for your time and consideration. If the Bureau or Department would like to contact us to discuss this proposed rule or other matters, please feel free to contact me, or Nia Duggins, Sr. Policy Representative for Business Issues.

Sincerely,



Kevin Brown
2026 President, National Association of REALTORS®

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