NCAI Resolution PSC-26-073 and the American Community Survey: Why More Analysis and Consultation Are Needed

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Purpose and Commendation

NCAI Resolution PSC-26-073, adopted at the 2026 Annual Convention, deserves the thanks of everyone who uses Census data on behalf of Indian Country. Its drafters saw early that the Census Bureau's September 10, 2026 proposal is not a technical adjustment to a questionnaire but a decision that will shape the data Tribal programs, federal formulas, and Indian health research depend on for decades. The resolution brings the issue before Tribal leaders nationally, assembles in its footnotes a useful inventory of programs that use Census data, and insists on meaningful government-to-government consultation.

This brief supports the resolution's call for more consultation and a Tribal-specific impact analysis, and argues the case for both is stronger than the resolution makes it. The benefits of the American Community Survey (ACS) depend on careful identification of American Indian and Alaska Native (AI/AN) people; longitudinal comparison depends on consistency; and no one has yet weighed the current ACS, its recent changes, and the proposed changes as they apply to AI/AN people and Indian Tribes. Points drawn from my earlier papers, *The American Community Survey and Indian Country* (September 2026) and *Who Was Added?* (October 2026), and from my comments on the proposed rule, are identified as such.

What the Proposal Does, and Why the ACS Is Still Exposed

The proposed rule (Docket USBC-2026-0628) would remove race and ethnicity questions from the 2030 decennial questionnaire and narrow the definition of usual residence. As my September paper noted, it does not restrict ACS demographic questions, so the resolution's language about eliminating the collection of AI/AN data overstates the rule.

The concern is still well placed. As my comments on the rule explained, ACS estimates are weighted to population estimates whose base is the decennial count by race. Remove race from the decennial and the ACS question survives, but its AI/AN benchmark does not; the same is true of the intercensal estimates many formulas use. This is the link the resolution needs. Many programs in its footnote 6, such as WIOA Section 166 and Title I allocations, already run on ACS-derived data. The rule reaches them by removing the foundation the ACS is calibrated to, and the Bureau has not said what would replace it.

The usual-residence change, named in the resolution's title, receives almost no analysis there. Movement between reservation and urban areas, extended households, and seasonal residence all affect where AI/AN people are counted, so this change may matter as much as the race question.

Reason One: ACS Benefits Depend on Careful Identification

Since 2005 the ACS has given Indian Country annual information on income, poverty, housing, employment, and, since 2008, health insurance, at national, state, county, and Tribal-area levels. Those benefits are only as good as the identification beneath them. My October paper found that the ACS

AI/AN count rose about 55 percent from 2019 to 2021. The entire increase fell among people reporting no IHS coverage, and more than half came from Hispanic respondents, consistent with the Latin American Indigenous examples added to the 2020 question.

A change in how a question is asked can thus change who is counted, by a large amount, with no change in the population Tribal health programs serve. Estimates of AI/AN poverty or uninsurance built on the 2021 population do not describe the same people as those built on 2019, and users who do not know this can misjudge need and trends. The resolution is right that administrative records may miss the populations Tribal governments serve, but self-identification can miss them too. Self-identification should be preserved; the question is how AI/AN identification will be made reliable and documented enough that users know which population an estimate describes.

Reason Two: Longitudinal Comparison Requires Consistency

My September paper argued that the ACS's two-decade continuous record, more than any single question, is what the current debate puts most at risk. Tribal governments, federal agencies, and researchers all depend on comparing conditions over time. That record is already strained by changes in the race question, most visibly in 2020, and by OMB's 2024 revision of the federal race and ethnicity standards, whose implementation is itself unsettled.

The proposed rule would add a larger break. If post-2030 AI/AN estimates rest on administrative records, modeling, or a reworked benchmark, users will need a bridge to earlier series, and the Bureau has not said how one would be built. Statistical systems must change, but an established measure should not be abandoned without a stated reason, a demonstrated replacement, and a documented bridge. For small AI/AN populations, where margins of error are already wide, a break without a bridge can end the ability to measure trends at all.

Reason Three: The Pros and Cons Have Not Been Weighed

Neither the Bureau nor the resolution weighs the three data regimes against each other for AI/AN people and Tribes. The current ACS offers continuous, detailed, Tribal-area data with a long comparable history, but carries large sampling error for small Tribes and depends on the decennial benchmark. The recent changes produced detailed data for 1,187 Tribes and villages in 2020, but also the 2019–2021 jump that falls mostly outside IHS-served populations. The proposed changes might gain from administrative records where self-response is weak, but they remove the decennial AI/AN benchmark and offer no stated method for producing or bridging AI/AN estimates.

The analysis should also sort which formulas use decennial AI/AN counts, which use the ACS, and which use neither. The resolution's $37.5 billion figure is total Native-related federal spending, not the amount allocated by Census data; most IHS funding, for example, moves through appropriations, compacts and contracts, and user population. It should explain how the AI/AN undercount would be measured: the 5.64 percent reservation undercount in 2020 could be measured only because race was collected. And it should test, as my September paper put it, whether administrative sources can reproduce the breadth, geographic detail, and self-identification of the current system.

Why the Call for Consultation Is Clearly Needed

These questions cannot be answered without the people who use AI/AN data every day: Tribal governments, Tribal health programs, Tribal epidemiology centers, and urban Indian organizations. Tribal leaders' objection to the limited notice and format of the October 2 consultation is well founded; a single session held before any analysis exists cannot be pre-decisional in any meaningful sense.

Recommendations

1. Withdraw or delay the rule until the Bureau publishes a Tribal-specific impact analysis, as the resolution requests.
2. Explain how ACS and intercensal AI/AN estimates will be benchmarked if race is removed from the decennial form.
3. Document how post-2030 AI/AN estimates will be bridged to the 2010 and 2020 series at national, state, county, and Tribal-area levels.
4. Address how response changes like the 2019–2021 increase will be identified and explained to users.
5. Explain how the 2030 AI/AN undercount will be measured, and analyze the usual-residence change for reservation and urban counts.
6. Sort the footnote 6 inventory by data source so funding exposure is measured, not assumed.
7. Hold consultation after that analysis is published, with adequate notice and formats that include Tribal technical staff.

The drafters of PSC-26-073 saw the stakes clearly. The next step is to give Tribal leaders the analysis the resolution asks for, so consultation can address what would actually change, for whom, and at what cost to the record Indian Country has built over twenty years.

Sources

National Congress of American Indians, Resolution #PSC-26-073 (adopted October 2026).

U.S. Census Bureau, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations, Federal Register, September 10, 2026.

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