

Comments from Methodist Healthcare Ministries of South Texas, Inc., on the U.S. Census Bureau's Proposed Rule on the Decennial Census

Methodist Healthcare Ministries of South Texas, Inc. is a private, faith-based nonprofit organization focused on improving access to healthcare for uninsured and low-income families in 74 counties across South Texas. Our mission of “Serving Humanity to Honor God” calls us to do all we can to enhance the well-being of the people and places we serve so that health equity is achievable and all can thrive. Since our founding in 1995, this mission has been supported by our co-ownership of the Methodist Healthcare System, the largest healthcare provider in San Antonio. Revenue from our co-ownership supports Methodist Healthcare Ministries' programs and services. Because of this funding model, we do not rely on federal funding or private donations to carry out our mission.

Methodist Healthcare Ministries appreciates the opportunity to provide comments on the U.S. Census Bureau's proposed rule, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, published on September 10, 2026.¹ The proposed changes to the decennial census include the narrowing of the definition of “usual residence” to exclude millions of noncitizens from the apportionment count and the elimination of race and ethnicity data collection from the decennial census.

We at Methodist Healthcare Ministries strongly oppose these proposed changes, as we believe that their approval and eventual implementation would have profound social, economic, and public health consequences and could adversely affect access to essential public services, fundamental rights, and the dignity of the most vulnerable populations.

Overview of the Proposed Rule

The Census Bureau's proposal would count only U.S. citizens and lawful permanent residents for purposes of the decennial census apportionment count, leaving out millions of noncitizen immigrants, including undocumented immigrants as well as lawfully present immigrants without permanent resident status. In addition, the Census Bureau proposes considering tax records to determine “usual residence,” which could further exacerbate the situation by excluding from the census count a significant number of people who do not file taxes for a variety of reasons. The Census Bureau bases its argument on the premise that the decennial census should focus on counting U.S. citizens and lawful permanent residents for purposes of apportioning seats in the

U.S. House of Representatives rather than on counting the entire resident population. However, Section 2 of the Fourteenth Amendment to the U.S. Constitution provides that representation is based on the “whole number of persons in each State,” without referring to citizenship or lawful permanent resident status.²

Implications for Health and Well-Being

The proposed changes have concerning implications for the health and well-being of millions of people, including children. The decennial census data are used to calculate funding provided to states for essential health and social safety-net programs, such as Medicaid, the Children’s Health Insurance Program (CHIP), the National School Lunch Program, and the Supplemental Nutrition Assistance Program (SNAP).^{3,4,5} For example, in June 2026, approximately 3.6 million Texans were enrolled in Medicaid and 326,000 children were enrolled in CHIP. ⁶ Moreover, in fiscal year 2025, an average of 3.47 million Texans participated in SNAP. ⁷ These figures illustrate the extent to which people in Texas rely on these public programs.

The exclusion of millions of people from the total population count could also result in substantial reductions in funding used for essential infrastructure, including hospitals, schools, roads, and fire departments. States with large immigrant populations, such as Texas and Florida, could be especially impacted, placing even greater pressures on healthcare, education, and other public systems that are already facing significant challenges. People served by Methodist Healthcare Ministries frequently describe having to make difficult trade-offs between accessing essential healthcare and meeting other basic needs, such as food and housing. For these individuals, a reduction in available public support could further limit their access to care and negatively affect their well-being and future opportunities.

Implications of Eliminating Race and Ethnicity Data

The elimination of race and ethnicity data collection will negatively impact health research and worsen existing health disparities. The decennial census is the only complete source of block-level data on race, ethnicity, and other demographic characteristics which are central to documenting persistent differences across population groups in access to healthcare, use of care, quality of care, and health outcomes.^{4,8} The rationale the Census Bureau provides for this change includes the argument that collecting these data increases the likelihood that certain individuals could be identifiable, potentially putting their privacy at risk. However, the Census Bureau’s own website explains that this type of information is protected by federal law, that private information that could identify an individual cannot be made public, and that statistical safeguards are used to prevent others from using census data to access specific information about an individual.⁹

Conclusion

The proposed changes to the decennial census could worsen existing inequities and contribute to vast differences in people's health, life expectancy, and quality of life. We at Methodist Healthcare Ministries believe that communities can only thrive and reach their fullest potential when all their members have an equal opportunity to achieve health and well-being and to participate fully in society. We urge the U.S. Census Bureau to withdraw the proposed rule and continue fulfilling the constitutional mandate to count all persons living in each state for purposes of congressional apportionment, as well as the broader role of census data in informing government decisions regarding the provision of essential public goods, services, and support for communities.

References

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