

# PUBLIC SUBMISSION

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## General Comment

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|| 19 JANUARY 2026

FOR: United States Bureau of Census

SUBJECT: Response to Proposed Survey of State Government R&D (90 FR 52616;USBC-25-0170)

(1) The authority of the United State's Bureau of Census (USBC) extends well into the proposed application, and no immediate legal issues are apparent (90 FR 52616(2025);13 USC § 1, et seq). What does present a concern, however, is the intended method of procurement.

(2) The proposal states quite candidly the intent to send an Excel "spreadsheet" (with formatting) to be updated by agencies and returned through an assigned coordinator (90 FR 52616(2025)). From a developers perspective my primary concern rests with data integrity and the effects in any varied degree of user proficiency. Like a report, the Bureau would also not benefit from any collection until submitted in its final form. This is very "analog" in terms of technique. I don't feel such form or presentation necessarily meet the current standards expected of federal government programs. The very act of conveying interest in statistical data is not only a reflection on the agency, but the government as a whole. We must take care not to officially present such authority with an image that by appearance is ad-hoc or unreliable. These issues may in and of themselves lead to consequences in data integrity (\*).

(3) I believe consideration of alternate methods is critical to reliable collection and appropriate presentation (Branding included). There are a number of options, including simple HTML / PHP or JavaScript Form pages

tied to a MySQL database. The ultimate goal should be data in secure locations that can be structured at will. Spreadsheets may be critical when working with data internally, but they are not intended to be a "customers" interaction with the Bureau.

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Robert Michael van Leeuwen  
Proud Father of Marjorie Linette Ramirez