



Primer: Ending the Past Partisan Weaponization of the Census and Ensuring a Nonpartisan, Fair, and Transparent Process

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The Census Bureau oversees a decennial census that counts the population of the United States every decade, and that count determines the allocation of 435 seats in the House of Representatives and, through them, the distribution of the Electoral College among the states. Under current practice, that count makes no distinction between a natural-born citizen, a naturalized citizen, a lawful permanent resident, and a person who entered the country unlawfully and remains subject to removal at any moment. Each has been counted identically and given equal weight to a state's claim on federal representation.¹

What unfolds from that counting is a constitutional conundrum. A state that obstructs federal immigration enforcement is rewarded with additional representation in Congress and additional Electoral College votes. A state that cooperates is penalized. Political power is transferred from the citizens of one state to the citizens of another on the basis of a population that cannot lawfully vote, cannot lawfully remain, and owes no allegiance to the United States. This reality is another stark example of how the very notion of citizenship is being nullified by progressive policies and activist courts.

Two questions follow from this problem. First, who properly counts as a person “in each State” for purposes of apportioning representation under the Fourteenth Amendment? Second, once those seats are apportioned, what population should a state use when drawing the districts themselves? The first turns on the meaning of the Fourteenth Amendment's command to apportion representatives according to the “whole number of persons in each State,” including what it means for a person to be “in” a state for representational purposes. The second is distinct: The Constitution does not prescribe a population base for drawing districts within a state, and the Supreme Court has left important questions unresolved. The legal paths are therefore different, and this primer treats them separately. It also models what these reforms would mean after the 2030 Census. The model asks what representation looks like when the census is de-weaponized and the “actual Enumeration” is restored to its proper constitutional purpose; it does not begin with a desired partisan outcome and then work backward to obtain an engineered result. The results bear out that method: Changing the apportionment base from all persons to citizens and

¹ U.S. CENSUS BUREAU, *Frequently Asked Questions (FAQs)*, <https://www.census.gov/topics/public-sector/congressional-apportionment/about/faqs.html>.

lawful permanent residents (as proposed by the Census Bureau in its most recent rule submission), other data integrity reforms, and states drawing maps with citizen-only population data materially changes the makeup of Congress under the Center for Renewing America's (CRA) modeling assumptions. Under the full set of assumptions examined here, the modeled ceiling produces a Congress composed of 261 Republican and 174 Democrat seats after the 2031 redistricting process is completed.

As previously stated, the Census Bureau recently proposed a rule that begins to make the same necessary corrections CRA supports by restoring meaning to residence, putting accuracy first, and limiting demographic questions that have increasingly burdened the constitutional count. The objective is not a census that favors one party or another. It is a census that is conducted fairly and accurately so that political representation follows from an accurate enumeration rather than an enumeration shaped around political or statistical ends. The constitutional order is first and foremost for citizens of the republic—anything short of that standard is disordered and fundamentally empowers noncitizens to steer the direction of the United States. If the republic is to endure, the practice of disfavoring American citizens' voices through the census must end.

Glossary

This primer uses a handful of technical terms. Each is defined here in plain language and used consistently thereafter.

Apportionment: distributing the 435 seats in the House of Representatives among the fifty states. A federal function, performed once a decade after the census.

Districting: drawing the district lines within a state after its seat count is fixed. A state function.

Apportionment base: the population used to distribute the seats in the House of Representative among the states. Every census from 1790 through 2020 counted everyone resident, regardless of legal status. The Census Bureau has proposed counting only U.S. citizens and lawful permanent residents beginning in 2030.

Districting base: the population a state equalizes when it draws its lines, so that every district contains the same number of people on whichever measure the state selects. Current practice uses total residents; this primer argues the measure should be citizens.

Method of equal proportions: the formula, set by federal statute in 1941, for distributing the 435 seats in the House of Representatives among the states. Described in more detail in the next section.

Lawful permanent resident: a green-card holder. This primer's proposed apportionment base counts citizens and lawful permanent residents. It does not count other lawfully present noncitizens, such as temporary visa holders, parolees, and those with temporary protected status, whose presence is authorized but not permanent.

Unlawfully present: a noncitizen present in the United States without legal authorization. Federal sources use several names for this population; the state-level figures this primer relies on are published by the Pew Research Center under the heading “unauthorized immigrant population.”² Pew’s category is somewhat broader than the legal term: it includes people with temporary, revocable protections such as DACA, Temporary Protected Status, and humanitarian parole, on the ground that those statuses can be withdrawn. Where this primer cites Pew figures, it uses Pew’s definition.

Ceiling: the maximum seat count available to both parties if every assumption in the model occurs, including the assumption that each state will redistrict to its highest possible durable partisan total during the upcoming redistricting processes. Those assumptions create a 261R–174D outcome. Any future changes in outcomes compared to the predicted outcomes will change the predicted ceiling. It is not a projection based on any level of certainty, given the number of events that must occur between now and 2031 for the variables to be certain enough for any type of reliable projection. Where a ceiling figure appears, it is labeled as one.

District lean: how a district would vote in a year when the country splits evenly between the two parties. A lean is not a prediction of who will win.

Neutral year (e.g., $D+7$, $R+3$): the national political environment. A neutral year is an even national split; “ $D+7$ ” means Democrats win the national vote by seven points.

Durable (also *durably*): a district drawn to hold for its party through an ordinary midterm swing, not merely in a favorable year. A map drawn durably trades some seats in a neutral year for seats that survive a bad one.

Displaced: district population that must be shifted among districts to equalize them by citizen population rather than total population.

I. Excluding Unlawfully Present Aliens from Apportionment

Ultimately, this primer analyzes the impact of various policy changes on the entire apportionment and redistricting process. Each of these changes will be challenged by the left. Legal arguments will be proposed in support of the recommended policy changes in the instances where the left will most likely oppose them. The first of these is excluding those present in the United States illegally from apportionment itself. Section 2 of the Fourteenth Amendment directs that representatives be apportioned according to “the whole number of persons in each State.”³ The operative phrase is “in each State” and not “persons”: Therefore the constitutional question is not whether unlawfully present aliens are persons—plainly they are—but whether a person whose presence is unlawful and who remains subject to removal is an inhabitant of a state in the constitutional sense.

² PEW RSCH. CNTR., *Unauthorized immigration* (Aug. 21, 2025), <https://www.pewresearch.org/topic/immigration-migration/immigration-issues/unauthorized-immigration/>.

³ U.S. CONST. amend. XIV, § 2.

The original Apportionment Clause counted free persons, added “those bound to Service for a Term of Years,” and excluded “Indians not taxed.”⁴ The phrase “not taxed” referred to capitation taxes, tying political inclusion to civic obligation. The framers of the Constitution plainly understood that physical presence within a state’s borders did not automatically translate into representational weight. The apportionment base has always been a defined legal category, not a raw head count.

This is the most consequential fact in the apportionment debate and the one that is most frequently overlooked. When the 2020 exclusion memorandum reached the Court in *Trump v. New York*, the Supreme Court dismissed the challenge as unripe and expressed no view on the merits.⁵ There exists no present holding that the Constitution requires counting unlawfully present aliens for apportionment. There is only a warning that any such policy must rest on an individualized, data-driven methodology rather than conjectural estimates, and a statement that federal law forbids the use of statistical sampling for apportionment.⁶

Under the Census Bureau’s long-standing practice—an arguably unconstitutional one—of including unlawfully present aliens in the apportionment population, jurisdictions that adopt sanctuary policies and frustrate federal immigration enforcement are rewarded with greater representation in the House and more Electoral College votes than those that follow the law. No other area of federal law is structured to compensate states for obstructing a federal function. The constitutional injury is against the citizens of cooperating states, whose representation is diluted by the deliberate policy choices of other states’ governments to flout federal immigration law.

The rule this primer proposes, and indeed the Census Bureau recently advanced, counts lawful permanent residents. Including lawful permanent residents is a prudential judgment about what the courts will currently sustain, not a concession that the Constitution requires them to be counted. The constitutionally stronger position is that representation belongs only to citizens. Nothing in the text compels the inclusion of any noncitizen in a state’s representational population, and the argument that it does rests on an assumption, not a holding. But the courts have not been asked that question squarely, and a litigant who asks it while also seeking to exclude unauthorized aliens may risk losing both. Nevertheless, the features that distinguish lawful permanent residents are precisely the features a court is likely to reach for in resisting their exclusion: Namely, lawful permanent residents are lawfully domiciled on a statutory path to citizenship bear the full obligations of taxation and, in the case of men, subject to Selective Service registration.

These characteristics make lawful permanent residents more difficult to exclude under an inhabitancy theory. Lawful permanent residents have a lawful and enduring connection to the United States that unlawfully present aliens do not. Because the argument for excluding unlawfully present aliens turns substantially on whether they can properly be considered inhabitants “in each State” for apportionment purposes, extending that argument to lawful permanent residents presents a more difficult legal question.

⁴ U.S. CONST. art. I, § 2, cl. 3.

⁵ *Trump v. New York*, 592 U.S. 125 (2020).

⁶ 13 U.S.C. § 195 (prohibiting the use of statistical sampling for apportionment purposes).

The distinction is one of legal strategy, not principle. This primer’s position is that federal apportionment should ultimately rest on citizens alone. But pressing a citizens-only rule now would require defending the exclusion of lawful permanent residents at the same time as the exclusion of unlawfully present aliens, potentially allowing the more difficult legal question to jeopardize the stronger one. The immediate proposal therefore counts citizens and lawful permanent residents while excluding unlawfully present aliens. A citizens-only apportionment base is deferred, not abandoned. Establishing it will require the courts to confront questions they have not yet resolved.

II. How Apportionment Works: The Mechanics of Apportionment

The Constitution requires an “actual Enumeration” of the population every ten years for the purpose of apportioning representatives among the states.⁷ The Census Bureau counts every resident, adds federal employees stationed overseas to their home states’ totals,⁸ and produces an apportionment population. The 435 seats in the House of Representatives are then distributed by equal proportions: Each state receives one seat as a constitutional floor, and the remaining 385 are allocated one at a time according to a formula. Before each round, every state is assigned a score—its population divided by a figure that rises each time it wins another seat—and the state with the highest score takes the next seat. Because that score falls every time a state gains a seat, its claim on the next one weakens. That is why the last several seats turn on very small differences in population.⁹

Two features of this distribution mechanism govern everything that follows. First, apportionment is zero sum. A state does not gain a seat by growing; it gains a seat by growing faster than the states against which it competes. Second, the marginal seats are often decided by extraordinarily thin margins. In 2020, New York lost a seat by eighty-nine people. Texas fell roughly 210,000 residents short of a third additional seat.¹⁰ Small changes in who is counted move real representation. In Texas’s case, the Census Bureau’s own post-enumeration survey found that the

⁷ U.S. CONST. art. I, § 2, cl. 3; *id.* amend. XIV, § 2.

⁸ Consider a rule already embedded in current practice. Americans serving overseas in the armed forces or federal civil service may still be counted in their home states for apportionment, even though they are not physically present there on Census Day. The Supreme Court upheld that practice in *Franklin v. Massachusetts*, recognizing that “usual residence” is not determined by physical presence alone but may reflect “some element of allegiance or enduring tie to a place.” 505 U.S. 788, 804–06 (1992). That rule illustrates the principle advanced here: Physical presence alone does not determine representational attachment. A service member stationed in Germany may still count toward his home state’s representation because his absence has not broken his enduring connection to that state. Yet a foreign national unlawfully present in the same state is counted toward its representation based on residence there, despite lacking the same enduring legal and political connection to the American community. Current practice thus recognizes that presence alone need not determine where a person belongs for apportionment while simultaneously giving presence substantial weight when counting noncitizens. At minimum, that tension supports asking whether representational weight should turn more deliberately on enduring legal and political membership rather than location alone.

⁹ 2 U.S.C. § 2a (method of equal proportions).

¹⁰ Kyle R. Cassal, Alex Henesy & Jim Harris, *Esri Mid-Decade Apportionment Projections for 2030—How the Next Census Could Reshape the Congressional Landscape*, ESRI (Dec. 8, 2025), <https://www.esri.com/arcgis-blog/products/esri-demographics/state-government/esri-mid-decade-apportionment-projections-for-2030-how-the-next-census-could-reshape-the-congressional-landscape>.

state undercounted by nearly 2 percent, a margin larger than the shortfall that cost it an additional seat.¹¹

Comparing counts across census years requires care. The 2020 census counted every resident; the base proposed for 2030 counts only citizens and lawful permanent residents. The comparison therefore combines two changes: a decade of population growth and a change in who is counted. Recomputing the 2020 allocation on the new base would move four states, so of the eleven seats that move between 2020 and 2030, roughly two are attributable to the base and the remainder to growth. The 2020 column is the certified result and is not restated; the model is run against it only to confirm that the method reproduces the official allocation.

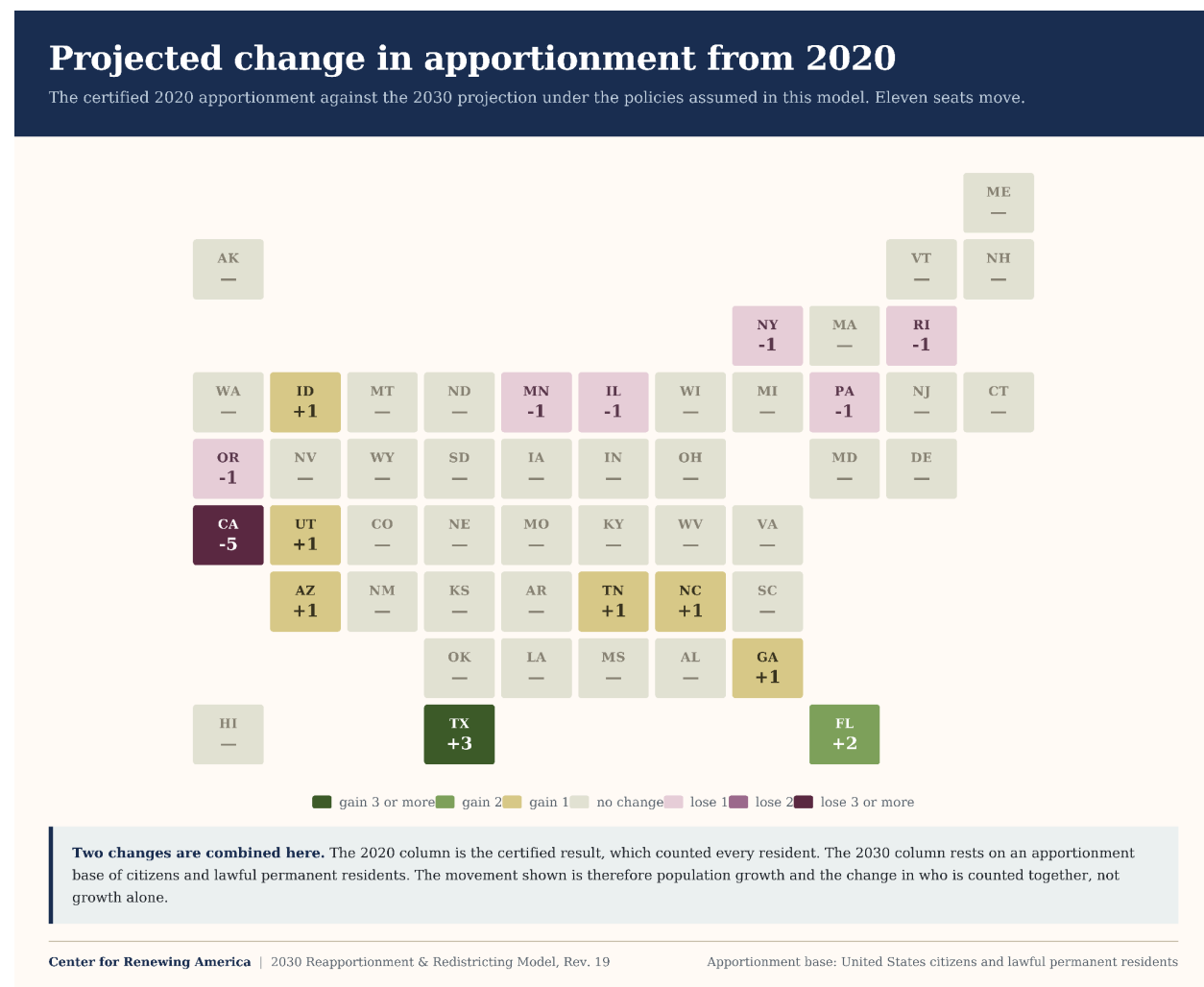


Figure 1. Projected change in apportionment from the certified 2020 result to the 2030 projection under the policies assumed in this model.

¹¹ Wade Miller & Andrew White, *The 2020 Census Fraud: How Differential Privacy Skewed Representation*, CNTR. FOR RENEWING AM. (Aug. 7, 2025), <https://americarenewing.com/issues/the-2020-census-fraud-how-differential-privacy-skewed-representation/>.

III. The Apportionment Base and Who Is Counted

How the seats are distributed is only half the question. The other is who belongs in the population from which those seats are distributed. The case for excluding unlawfully present aliens from that population does not rest on partisan outcomes. It rests on a more fundamental principle: Representation belongs to those who lawfully constitute the legitimate political community. This view is foundational and essential to the functioning of our republic. Citizens determine the political direction and policies of the United States.

For purposes of apportionment, this primer proposes removing unlawfully present residents from the population used to distribute House seats among the states (as does the Census Bureau's recent proposed rule) while continuing to count citizens and lawful permanent residents. A more aggressive approach would limit the apportionment base to citizens alone. The American Redistricting Project modeled this more aggressive citizens-only approach in January 2026 using the 2024 American Community Survey's five-year estimates.¹² This primer does not model those alternative policy assumptions. The reasons for adopting the narrower lawful-presence approach are pragmatic, not partisan, and are addressed in Section IV.¹³

IV. The Restoration of the Citizenship Question

A. Obtaining Reliable Citizenship Data

No policy discussed in this primer is operable without first establishing who is a citizen of the United States. The decennial census has not asked a direct citizenship question of every household since 1950.¹⁴ Restoring the citizenship question is necessary, but the sequence matters. As CRA has long argued, restoring the citizenship question must be done—at a minimum—in tandem with the elimination of differential privacy and other data falsification protocols, lest the entire purpose of adding the question be rendered moot.

Critics may assert that the Supreme Court foreclosed restoration of the citizenship question in *Department of Commerce v. New York*. That view profoundly misreads the decision. The Court did not hold that asking about citizenship is constitutionally impermissible. It held that the secretary of commerce's stated rationale—enforcement of the Voting Rights Act—was pretextual and that the decision therefore failed review under the Administrative Procedure Act.¹⁵ The defect was in the process, not the substance of the question.

¹² AM. REDISTRICTING PROJECT & FAIR LINES AM. FOUND., *2030 Apportionment Forecast: Citizen Population* (Jan. 29, 2026), <https://thearp.org/blog/apportionment/2030-citizen/>.

¹³ In the long term, the question of apportionment using citizen population only does not need to be revisited, as it is theoretically more ideal and centers the importance of citizenship in the United States' representative processes. That debate necessarily would invoke more complex legal and statutory conversations. Should a policy window for that debate present itself before the next census process ends, that conversation would be welcome, even though it is unclear whether citizen-only apportionment would increase or decrease the 261–174 seat ceiling the model currently produces (and for which side). Regardless, it is the correct policy, one that ensures a fair census process.

¹⁴ D'vera Cohn, *What to Know About the Citizenship Question the Census Bureau Is Planning to Ask in 2020*, PEW RSCH. CNTR. (Mar. 30, 2018), <https://www.pewresearch.org/short-reads/2018/03/30/what-to-know-about-the-citizenship-question-the-census-bureau-is-planning-to-ask-in-2020/>.

¹⁵ *Dep't of Commerce v. New York*, 588 U.S. 752 (2019).

Self-reporting of citizenship status cannot stand alone. Some people who are unlawfully present in the United States may decline to respond to the question and identify themselves, rendering the data unusable. The first Trump administration’s Administrative Records Project matched census responses against Social Security, IRS, Department of State, and United States Citizenship and Immigration Services files to establish citizenship status independent of a respondent’s candor.¹⁶ Restoring the question and reinstating administrative-record matching should therefore proceed together.

B. Distinguishing Apportionment from Redistricting Data

The Census Bureau delivers redistricting data to the states under 13 U.S.C. § 141(c).¹⁷ Apportionment is a federal constitutional function: Section 2 of the Fourteenth Amendment governs the division of representatives among the states, and 13 U.S.C. § 141(b) requires the secretary of commerce to report to the president the “tabulation of total population by States” required for that purpose.¹⁸ Once those seats are allocated, however, the process moves from federal apportionment to redistricting within the states.¹⁹

As CRA has previously explained, Congress has preserved the constitutional distinction between apportionment and redistricting in the Census Act itself.²⁰ Section 141(b) expressly requires a tabulation of “total population” for federal apportionment. Section 141(c), which governs the population tabulations furnished to the states for redistricting, contains no corresponding “total population” requirement.²¹ Instead, subsection (c) directs the secretary to furnish the relevant state officials with the “tabulations of population” for the geographic areas identified through the statutory redistricting-data process.²² The choice of words is significant; as CRA has previously pointed out, this is the point at which the process moves from federal apportionment to state-level redistricting: Congress expressly specified “total population” in the former provision but did not repeat that command in the latter.²³ The Census Bureau can therefore produce distinct population tabulations for these distinct representational functions.

It is important to underscore that citizenship in our constitutional republic must matter and that the census process must fundamentally only be used to advance the political concerns of those who legitimately belong to it. That truth should animate future efforts by Congress to refocus the entire apportionment process solely around citizens—with no special distinguishing element reserved for noncitizens who are in the United States legally.

Whatever population is ultimately determined to govern federal apportionment, the Census Bureau can separately produce citizen-population data for redistricting, allowing the legal

¹⁶ Exec. Order No. 13,880, 84 Fed. Reg. 33,821 (July 11, 2019).

¹⁷ 13 U.S.C. § 141(c).

¹⁸ U.S. CONST. amend. XIV, § 2; 13 U.S.C. § 141(b); *see also* 2 U.S.C. § 2a(a).

¹⁹ *See* U.S. CONST. art. I, § 4, cl. 1; 13 U.S.C. § 141(c).

²⁰ Benjamin Osborne, *Primer: Fixing the Weaponized Redistricting Process*, CNTR. FOR RENEWING AM. (Nov. 24, 2025), <https://americarenewing.com/issues/primer-fixing-the-weaponized-redistricting-process/>.

²¹ 13 U.S.C. § 141(b)–(c); *see also* Osborne, *supra* note 20.

²² 13 U.S.C. § 141(c).

²³ *See* Osborne, *supra* note 20.

argument for citizen-based districting to proceed independently of the separate argument for excluding unlawfully present aliens from the federal apportionment base.²⁴

V. Citizen-Based Districting

The districting question is separate from the apportionment question, and neither depends on the other. Districting is a state function, and the courts have yet to hold that the Constitution specifies a base population at all. A state that receives its portion of House seats under a total-persons apportionment (citizens, lawful permanent residents, and unlawfully present aliens) may still draw its districts from only the citizen population.

Section 2 of the Fourteenth Amendment governs the allocation of seats among the states. It says nothing about how a state divides itself internally via districting. Districting is a state function under the Elections Clause,²⁵ constrained by the Equal Protection Clause but not by any specified population base. Congress has never legislated one, and the Constitution does not supply one overtly, though future legal arguments may be advanced interpreting various other constitutional provisions to indirectly answer this question.

In *Evenwel v. Abbott*, Texas voters argued that the Constitution requires districting by citizen population. The Supreme Court held that states are allowed to use total population—but stopped there.²⁶ It did not hold that states are required to do so. Justice Samuel Alito wrote separately to make precisely that point,²⁷ and Justice Clarence Thomas observed that the Constitution prescribes no particular theory of representation.²⁸ A question the Court reserves is a question the Court invites. *Evenwel* established that total population is one lawful choice; it *did not establish* that it is the only one.

The Court’s reservation in *Evenwel* should be read to reach congressional districts as well. *Evenwel* arose from state legislative districting, and the court’s analysis ran through the Equal Protection Clause. Congressional district populations are governed by *Wesberry v. Sanders*, which similarly grounds the equal-population requirement in Article I’s command that representatives be chosen “by the People of the several States.”²⁹ This is a rule about equality between districts, not a specification of which population must be equalized. Nothing in *Wesberry* identifies the measure, and the apportionment clause’s “whole number of persons” governs the division of seats among the states rather than the drawing of lines within one. Taken together, *Evenwel* and *Wesberry* do not foreclose the use of a population base other than total population.

In *Burns v. Richardson*, the Court approved Hawaii’s use of a registered-voter base for state legislative districts, reasoning that the state’s “special population problems” justified a departure

²⁴ See 13 U.S.C. § 141(a), (c); Osborne, *supra* note 20; see also Benjamin Osborne, *Primer: Republishing the 2020 Census*, CNTR. FOR RENEWING AM. (Aug. 8, 2025), <https://americarenewing.com/issues/primer-republishing-the-2020-census/>.

²⁵ U.S. CONST. art. I, § 4, cl. 1.

²⁶ *Evenwel v. Abbott*, 578 U.S. 54 (2016).

²⁷ *Id.* at 92–93 (Alito, J., concurring in the judgment).

²⁸ *Id.* at 76 (Thomas, J., concurring in the judgment).

²⁹ *Wesberry v. Sanders*, 376 U.S. 1, 7–8, 18 (1964).

from the total population count.”³⁰ The Court approved that base because it produced a distribution not substantially different from what a permissible base would have yielded, and it cautioned that a registered-voter measure is open to manipulation in ways a citizen-population measure is not. *Burns* did not concern congressional districts, but its historical significance remains instructive: Total population has not been treated as an immutable measure of representational population in American redistricting. Several state constitutions likewise historically apportioned legislative seats by citizen population, legal voters, or qualified electors. Kansas, for three decades, adjusted federal census figures before drawing its legislative districts, excluding nonresident military personnel and students and reallocating resident service members and students to their permanent residences.³¹ Although Kansas voters repealed that requirement in 2019,³² the broader practice remains alive today, as several states reallocate incarcerated persons to their prior residences before drawing legislative districts. These examples do not themselves resolve the distinct constitutional rules governing congressional apportionment; they establish the narrower—and important—point that using an adjusted population base for representation is neither novel nor foreign to American practice.

A nation in which roughly one in six residents is foreign born, and a substantial share of those are unlawfully present, poses precisely the kind of representational question that warrants reconsidering whether raw total population should remain the unquestioned measure for every purpose. As CRA has previously explained, *Burns* and *Evenwel* provide substantial support for state discretion, and perhaps a mandate, in regard to adopting citizen-based redistricting because the court has left the constitutional door open in using citizen voting age population or other related forms of redistricting data.³³

A. The Model’s Independence from Partisan Outcomes

Counting citizens rather than all residents is not a technique that rewards one party’s mapmakers. It changes the population every mapmaker must equalize, and the consequences follow from where citizens and noncitizens live rather than from who holds the pen. The methodology appendix sets out the measurement.

B. One Person, One Vote

Reynolds v. Sims held that the conception of political equality “can mean only one thing—one person, one vote.”³⁴ The doctrine arose from malapportionment cases in which rural districts containing a fraction of the population elected the same number of legislators as urban districts. The wrong the court remedied was unequal voting power. This primer argues that where districts are equalized by total population but diverge sharply in citizen population, an analogous inequality can arise in inverted form.

C. Equal Protection

³⁰ *Burns v. Richardson*, 384 U.S. 73, 92–94 (1966).

³¹ KAN. CONST. art. 10, § 1(a) (2018).

³² See S.C.R. 1605, 2019 Leg., Reg. Sess. (Kan. 2019), adopted Nov. 5, 2019.

³³ Osborne, *supra* note 20.

³⁴ *Reynolds v. Sims*, 377 U.S. 533, 558 (1964) (quoting *Gray v. Sanders*, 372 U.S. 368, 381 (1963)).

Consider two districts of precisely 790,000 residents each. In the first, 640,000 are citizens of voting age. In the second, 460,000 are. These disparities are created by the current process of drawing maps that include legal immigrant and illegal alien populations. Each of those two districts elects one representative. A citizen in the second district exercises roughly 1.4 times the influence over the selection of a representative that a citizen in the first district exercises. The state has produced this disparity by law, through a deliberate districting choice even though a readily available alternative population base would avoid that disparity. A statute that expressly weighted one citizen's ballot at 1.4 and another's at 1.0 would face immediate constitutional challenge. The argument for citizen-based districting is that a sufficiently large disparity in citizen population can produce a comparable inequality in citizens' electoral influence.

D. Republican Form of Government

Article IV, Section 4 guarantees every state a republican form of government—a government deriving its just powers from the consent of the governed, expressed through those entitled to give it.³⁵ Where representational weight is assigned on the basis of residents who cannot lawfully consent through the ballot, the connection between the represented and the representative is inherently severed. Representation transfers to whichever citizens happen to reside nearby, magnifying their voice at the expense of citizens elsewhere in the same state.

The claim is narrow and defensible: A state may not draw district lines that substantially and systematically inflate one citizen's voting power relative to others when an available alternative population base would avoid that result.

Importantly, citizen-based districting requires no reinterpretation of “whole number of persons.” It requires no federal action against a state. It asks the court to resolve, in a state's favor, a question it has already identified as open, on a subject the Constitution commits to the states. Several courts have gone further and suggested that the choice of districting base may be a nonjusticiable political question,³⁶ an approach that could substantially limit federal judicial review of a state's choice of population base. The argument works with the doctrine rather than against it.

³⁵ U.S. CONST. art. IV, § 4.

³⁶ See *Gaffney v. Cummings*, 412 U.S. 735, 749 (1973); *Chen v. City of Houston*, 206 F.3d 502, 528 (5th Cir. 2000); *Daly v. Hunt*, 93 F.3d 1212, 1227 (4th Cir. 1996).

The House under the policies proposed

The 2030 House under the policies assumed in this model, with maps drawn by whoever holds the pen in each state in 2031.

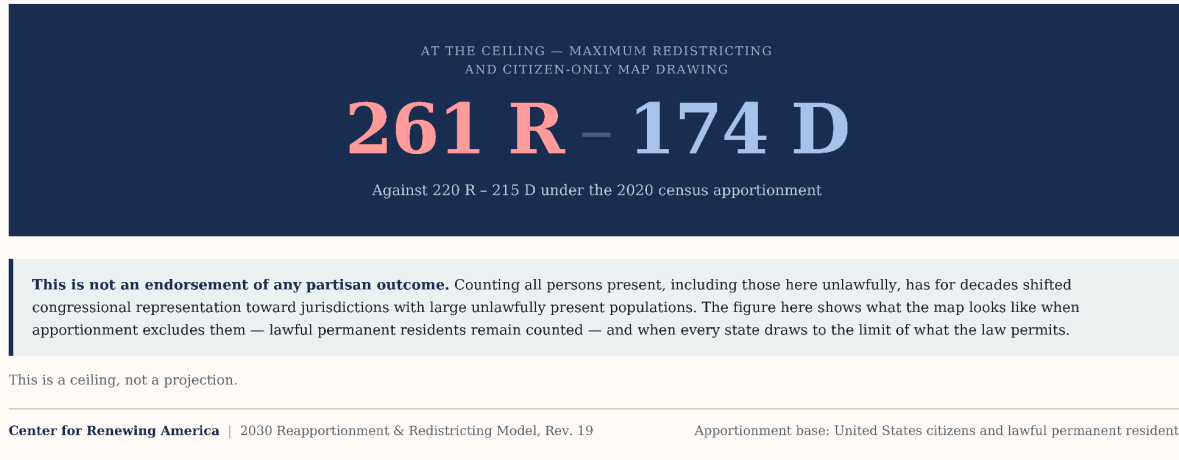


Figure 2. The House under the policies proposed.

VI. The State-by-State Picture

The modeled assumption rests on a chain of six steps. Each is stated so that a reader can check the reasoning or reject it at any point of disagreement.

1. *Project the population.* State populations are carried forward from the Census Bureau's July 2025 estimates to Census Day 2030. Growth is assumed to slow substantially from the 2021–2024 pace, consistent with the sharp decline in net international migration recorded during 2025. The slowdown here follows President Donald Trump's sustained commitment to border enforcement beginning in January 2025, which ended the surge of the preceding four years under the Biden–Harris administration. The state population estimates are approximations because there is not yet enough longitudinal data to fully project the effects of immigration law enforcement.
2. *Divide the seats.* The 435 seats are allocated by the method of equal proportions described above, based on the proposed rule submitted recently by the Census Bureau. When run against unadjusted 2020 Census counts, the model reproduces the certified 2020 apportionment exactly in all fifty states, including New York's loss of a seat by eighty-nine people. That test is the reason to give the model some credence as it analyzes post–2030 Census impacts.
3. *Apply the proposed apportionment base.* The same formula is run on populations net of those the proposed rule would not count: unlawfully present residents and lawfully present noncitizens whose status is less durable than a green card. It is genuinely rerun rather than approximated.
4. *Determine who draws each map in 2031.* Every state is assigned to a Republican trifecta, a Democratic trifecta, a redistricting commission, or a divided government, with a probability attached. Roughly one-fifth of the states are genuinely uncertain. California,

where a suspended commission is scheduled to resume, is the single largest open question.

5. *Assign partisan lean.* Where a legislature controls the map, districts are assumed to be drawn aggressively but durably, roughly 56–58 percent for the controlling party. That is aggressive enough to maximize seats and conservative enough to survive an ordinary midterm. Drawing to 53 or 55 percent would yield more seats on paper and lose them in the first bad year. Modeling policy impacts in this way further demonstrates that this process is not an exercise in partisan wishcasting seeking to maximize or minimize impacts to either party but rather is an attempt to equalize the motives and expected actions of both parties where they hold power. Where a court or a commission draws, the projection stays close to the existing delegation.
6. *Check the answer twice.* The two calibration checks described below compare each state’s projected seats against its people’s voting preferences, and the national total against historical experience.

A. What the Model Produces

On the apportionment base proposed for 2030, with maps drawn by whoever holds the pen in each state in 2031, and extrapolating for all other policy assumptions, Republicans could durably draw more than 243 and up to 261 of 435 districts and Democrats 174 based on various assumptions and redistricting analysis from nonpartisan experts interviewed for this project.

B. How to Interpret the Model

The House elected in November 2024 seated 220 Republicans and 215 Democrats, so 261 Republican seats represents a gain of 41 if all policy and redistricting assumptions hold. One qualification for these modeled outcomes is that these are district leans in a neutral year, not predicted election results. Actual outcomes could differ based on enacted policies and the partisan trends of the electorate in the coming years.

Three observations bear emphasis:

- The districting changes are not cumulative with the apportionment change; they layer a separate legal question atop the same seat counts. States whose maps are drawn by independent commissions or by courts—among them Arizona, California, Colorado, Michigan, New Jersey, Washington, Virginia, Wisconsin, Minnesota, and Pennsylvania (the last three states’ maps are court-drawn for the current cycle only)—respond only marginally to any of these changes because the mapmaker is not a partisan legislature.
- The table in figure 3 reports each state’s delegation as currently constituted. That column exists to ground the projection. A change in the population base alters the *shape* of districts; it does not compel a legislature to concede a seat it would otherwise hold.
- Two calibration checks animate the whole exercise. The first asks whether each state’s projected seats are consistent with how its people actually vote. The second asks whether the national result has ever occurred. Adding up the votes cast for the two major parties across all fifty states, weighting each state by the number of seats it holds yields wins for Republicans in roughly 51 percent of districts. This model ceiling gives Republicans 60

percent of the seats. That gap of about nine points is what drawing the lines is worth, and it is higher than what the 2012 cycle produced after the previous decade's redistricting.

All fifty states at the ceiling

The certified 2020 apportionment against the 2030 projection under the policies assumed in this model, with every state drawn to the limit the law permits. Each seat column totals 435.

STATE	'20 ACT.	2030 SEATS	AT THE CEILING	STATE	'20 ACT.	2030 SEATS	AT THE CEILING
Alabama	7	7	7-0	Montana	2	2	2-0
Alaska	1	1	1-0	Nebraska	3	3	3-0
Arizona	9	10 ⁺¹	7-3	Nevada	4	4	2-2
Arkansas	4	4	4-0	New Hampshire	2	2	1-1
California	52	47 ⁻⁵	13-34	New Jersey	12	12	3-9
Colorado	8	8	4-4	New Mexico	3	3	0-3
Connecticut	5	5	0-5	New York	26	25 ⁻¹	6-19
Delaware	1	1	0-1	North Carolina	14	15 ⁺¹	12-3
Florida	28	30 ⁺²	27-3	North Dakota	1	1	1-0
Georgia	14	15 ⁺¹	12-3	Ohio	15	15	13-2
Hawaii	2	2	0-2	Oklahoma	5	5	5-0
Idaho	2	3 ⁺¹	3-0	Oregon	6	5 ⁻¹	0-5
Illinois	17	16 ⁻¹	2-14	Pennsylvania	17	16 ⁻¹	9-7
Indiana	9	9	9-0	Rhode Island	2	1 ⁻¹	0-1
Iowa	4	4	4-0	South Carolina	7	7	7-0
Kansas	4	4	4-0	South Dakota	1	1	1-0
Kentucky	6	6	6-0	Tennessee	9	10 ⁺¹	10-0
Louisiana	6	6	6-0	Texas	38	41 ⁺³	35-6
Maine	2	2	1-1	Utah	4	5 ⁺¹	4-1
Maryland	8	8	0-8	Vermont	1	1	0-1
Massachusetts	9	9	0-9	Virginia	11	11	5-6
Michigan	13	13	7-6	Washington	10	10	3-7
Minnesota	8	7 ⁻¹	3-4	West Virginia	2	2	2-0
Mississippi	4	4	4-0	Wisconsin	8	8	4-4
Missouri	8	8	8-0	Wyoming	1	1	1-0

2020 CENSUS APPORTIONMENT
HOUSE AS ELECTED NOV. 2024

220 R 215 D

AT THE CEILING — MAXIMUM REDISTRICTING
AND CITIZEN-ONLY MAP DRAWING

261 R 174 D

The two seat columns rest on different bases. 2020 is the certified result, which counted every resident. 2030 rests on an apportionment base of citizens and lawful permanent residents.

Figure 3. All fifty states, 2020 against 2030 under the policies proposed. Each column totals 435 seats.

VII. Anticipated Objections

Critics will contend that the Fourteenth Amendment says “persons,” that the Constitution’s framers used narrower terms elsewhere when they meant them, that the 1866 debates demonstrate that the drafters knew aliens were present and counted them regardless, and that every apportionment in American history has used total population. The reality is that citizens—those for whom the constitutional order is designed to serve—should drive the apportionment of political power among the states. Further, opponents will likely argue that if noncitizens may be excluded because they cannot vote, the same reasoning reaches minors, who constitute roughly a quarter of the population. The distinction turns on minors’ prospective citizenship: A child is a member of the political community who will inherit the franchise by operation of law, but a person who is unlawfully present in the country will not inherit the franchise and is subject to removal. The categories are not analogous, and the principle of consent of the governed reaches the child in a way it does not reach the alien.

Opponents will likely argue that a citizenship question could depress response rates in immigrant communities, degrading the count for citizens and noncitizens alike and rendering the resulting data unreliable. But that objection can be met operationally with administrative-record matching, robust nonresponse follow-up, and a transparent and uniformly applied methodology that can produce data sufficiently reliable for representational use. The Constitution affords the federal government substantial discretion in census methodology so long as its chosen method bears a reasonable relationship to accomplishing an actual enumeration consistent with the constitutional goal of equal representation.³⁷

An objection may arise that if the population base for districting is a state prerogative, then a state must remain free to choose total population, and the federal government cannot mandate citizen-based districts. For state legislative districts, *Evenwel* held using total-population districting permissible and expressly reserved the question of whether a state may instead equalize voter-eligible population.³⁸ But congressional districting is different. The Elections Clause gives Congress express authority to “make or alter” state regulations governing congressional elections, including congressional districting.³⁹ Congress therefore has a substantially stronger basis to require congressional districts to be equalized by citizen population. The principal constitutional objection instead comes from *Wesberry* and *Karcher*, which require congressional districts to achieve population equality as nearly as practicable.⁴⁰ Neither case, however, decided which population measure Congress may require states to equalize. The question can therefore be presented directly: whether Article I requires the federal government to tolerate districts equal in total residents but substantially unequal in the citizens whose votes choose their representatives. This primer argues that it does not and that Congress can mandate citizen-population equality for congressional districts to the fullest extent the Constitution permits.

Even if a court concludes that Article I requires total-population equality or otherwise preserves state discretion over the districting base, that decision would not require the federal government

³⁷ *Wisconsin v. City of New York*, 517 U.S. 1, 20–21 (1996).

³⁸ *Evenwel v. Abbott*, 578 U.S. 54, 63, 74–75 (2016).

³⁹ U.S. CONST. art. I, § 4, cl. 1.

⁴⁰ *Wesberry v. Sanders*, 376 U.S. 1, 7–8, 18 (1964); *Karcher v. Daggett*, 462 U.S. 725, 730–31 (1983).

to make total population the default redistricting dataset. As laid out in this primer, Title 13 expressly requires a “total population” tabulation for apportionment among the states, but its separate redistricting provision requires “tabulations of population” without prescribing the same denominator.⁴¹ The federal government can therefore furnish reliable citizen-population data as the standard redistricting product to the fullest extent existing law permits, and Congress can amend the statute if necessary to make that rule explicit. A state that remains legally free to use total population or another permissible base could continue to do so using the data necessary for that choice. The federal government, meanwhile, can furnish citizen-population data for redistricting without displacing whatever discretion the Constitution ultimately leaves to the states. This approach advances citizen-based districting while preserving state authority where federal law requires it.

VIII. Conclusion

The Constitution has never been construed to guarantee representation to foreign nationals with no lawful right to remain in the United States. The Supreme Court has neither foreclosed the exclusion of unlawfully present aliens from apportionment nor mandated their inclusion in districting. On the contrary, it has twice signaled that these questions remain open—in *Trump v. New York*, by declining to reach the merits, and in *Evenwel*, by expressly reserving the districting base for another day.

The path forward is sequential and disciplined. Eliminate differential privacy and other data falsification protocols. Restore the citizenship question with an administrative record that can withstand review. Reinstate administrative-record matching so the resulting data rest on files rather than on candor. Furnish citizen-population tabulations as the federal redistricting dataset while separately reporting the total-population figures required for congressional apportionment. Congress can amend Section 141(c) if necessary to make that distinction explicit and establish citizen population as the governing federal dataset for congressional redistricting. The result is a census that continues to count every person the Constitution may require for apportionment and/or federal funding formulas while ensuring that congressional districts are drawn around the citizens whose votes choose their representatives.

Counting citizens is not a technical adjustment to a statistical program. It is the restoration of a first principle that our institutions have too often allowed to erode: American citizenship must mean something. For decades, government systems and processes have methodically blurred the distinction between the citizen and the noncitizen, extending the benefits of political membership while diminishing the significance of the legal status from which those benefits are supposed to flow. The result is a system in which citizens watch their political power being diluted precisely because the law refuses to distinguish between those who constitute the American political community and those who do not. Thus citizenship is transformed from a meaningful constitutional status into little more than an administrative designation. A self-governing republic cannot sustain that inversion. Citizenship carries obligations, confers rights, and establishes membership in the sovereign body from which legitimate government derives its authority. Our representational institutions should reflect that fact. Counting citizens for representation therefore does more than correct a distorted process. It restores value to citizenship itself and

⁴¹ 13 U.S.C. § 141(b)–(c).

reaffirms the basic promise of republican government: Political power belongs, ultimately, to the American people.

Seat projections are the model's own apportionment, computed under the method of equal proportions from Census Bureau Vintage 2025 population estimates carried forward to Census Day 2030. Run against the 2020 base, the same procedure reproduces the certified 2020 apportionment in all fifty states. The American Redistricting Project's January 2026 forecast agrees in all fifty states and is cited as corroboration, not as a source. State-level unauthorized population is taken from Pew Research Center's published state table of August 2025. Projections are estimates and carry material uncertainty, particularly given the decline in net international migration recorded in 2025. Partisan figures represent district lean in a neutral national environment and are not a forecast of election outcomes.

Appendix: Methodology

2030 Reapportionment and Redistricting Model | Center for Renewing America

WHAT THE MODEL ANSWERS

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- Estimates the composition of the U.S. House following the 2030 census under stated assumptions about the apportionment base and how states draw districts.
 - Reports district lean in a neutral national environment. It answers how many districts can be drawn to lean toward each party, not how many seats either party will hold. Further, the model does not attempt to assign an independent seat value to each policy change. The effects interact geographically and are order-dependent, so decomposing them would produce different individual answers that add up to the same aggregate, depending on the sequence in which the assumptions are applied, and could double-count the same districts. The model therefore reports the combined effect of the policy package under a common set of assumptions.
 - It is not a forecast of any election and not an endorsement of any partisan outcome.

POPULATION AND APPORTIONMENT

-
- State populations: Census Bureau Vintage 2025 estimates (NST-EST2025), released January 27, 2026. The release was delayed from December 2025 by the lapse in federal funding. High confidence.
 - 2030 projection: a three-year weighted growth rate (2022–2023 $\times 1$, 2023–2024 $\times 2$, 2024–2025 $\times 3$) applied to the July 1, 2025, estimates and compounded 4.75 years to Census Day 2030. Recent years are weighted more heavily, consistent with the sharp decline in net international migration recorded during 2025.
 - Apportionment computed under the method of equal proportions, 2 U.S.C. § 2a—the statutory method applied in full, not approximated. Validation: Run against the April 1, 2020, estimates base, the same procedure reproduces the certified 2020 apportionment in all fifty states, including the eighty-nine-person margin separating Minnesota and New York.
 - Cross-check: This projection agrees with the American Redistricting Project's forecast of January 27, 2026, in all fifty states. The American Redistricting Project is cited as corroboration, not as the source.
 - Projected 2030 resident population: 353.1 million; average district 811,685.

One apportionment base is modeled: U.S. citizens and lawful permanent residents. Every other foreign citizen is excluded, including lawfully present noncitizens whose status is less durable than a green card. The base is projected 2030 population less the unauthorized population by state (Pew Research Center), less the resident nonimmigrant population by state (DHS Office of Homeland Security Statistics, fiscal year 2024), less an estimate for refugees and asylees not yet adjusted to permanent residence.

- Citizen population by state, county, and congressional district: Census Bureau Citizen Voting Age Population special tabulation from the 2020–2024 American Community Survey five-year estimates. The `cit_est` field is total citizens of all ages, which is the base a citizen-population districting rule would equalize. High confidence.
- Unlawfully present population by state: Pew Research Center, “Unauthorized immigrant Population for States, 1990–2023,” detailed state table accompanying its August 21, 2025, report. All fifty states taken directly from the published table. Moderate to high confidence.
- Resident nonimmigrant population by state: DHS Office of Homeland Security Statistics estimate for fiscal year 2024, published August 12, 2025. That source names the twenty largest states individually and groups the remainder, with cases of unknown states, in a single figure of 820,000. This analysis distributes that residual across the remaining states in proportion to each state’s non-citizen population; the allocation was tested against three alternatives, and the seat result is unchanged under all but a uniform per-state distribution. Refugees and asylees granted status but not yet adjusted to permanent residence are estimated at 500,000 nationally; this population appears in neither the Pew nor the DHS series.
- Scope of the apportionment change: This model adopts the proposed apportionment base and nothing further from that rulemaking. The rule would also redefine “usual residence” for every person counted—counting a person where he or she lawfully spent the most days between January 3 and April 1, evidenced by tax records; governing dependents; and counting military personnel at their tax residence rather than their duty station. Those provisions move population without regard to citizenship. Their effects are real but not estimable from published data with enough stability to report, and they are not carried here. The rule is proposed rather than final, and litigation over the 2020 apportionment base is pending.
- Recomputing the 2020 allocation on the proposed base is a sensitivity check rather than an alternate result: It differs from the certified 2020 allocation in four states: California 51, Texas 37, Ohio 16, and Michigan 14. That difference is how much of the 2020–2030 movement is attributable to the change in base rather than to population growth. The 2020 unauthorized figures are Pew’s 2021 estimates since no 2020 estimate was produced; its 2019 figures give an identical fifty-state result. Texas gains three seats between the certified 2020 apportionment and the 2030 projection, from 38 to 41, and California loses five, from 52 to 47. One seat of each movement is the change in apportionment base rather than population growth: Recomputed on the new base, 2020 would have given Texas 37 and California 51. Measured consistently on either base, Texas gains four and California loses four.

THE DISTRICTING STAGE

- Redistricting is modeled as a single stage rather than as separable components.
- Within that stage, wherever a legislature holds the pen and in whichever direction that legislature draws, the model applies

- maximum partisan redistricting permitted under state law,
- the dismantling of race-predominant districts permitted by *Louisiana v. Callais*, and
- districts drawn from citizen population rather than total resident population.
- These mechanisms are not independently additive. They operate on the same districts through the same means, and where race-predominant districts and high noncitizen populations coincide they erode the same districts. Reporting them as separate components would double-count.
- T is measured, not estimated. For each state, every current congressional district's citizen population is compared against the state's citizen quota, and the shortfalls are summed. Because districts were drawn equal in total population, the shortfall is exactly the district weight that must move under a citizen base. No parameters are required.
- Weight becomes a seat only where it crosses a partisan boundary. The conversion rate is measured from precinct election returns in thirteen states.
- The rate is not a constant and should not be modeled as one. It is a partisan-geography term: displaced weight converts where the territory absorbing it votes Republican and does not where it does not.
- The citizen-only effect is carried within the combined districting stage and is not reported as a separate figure. Its mechanisms operate on the same districts as maximum partisan redistricting and the dismantling of race-predominant districts, so reporting it separately would double-count. The published figures are conservative: They credit the effect only where it is attributable to a named state, and a state-level analysis drawing actual maps would likely find more.
- Effects are capped at seats available: A state cannot lose more seats than it holds.
- Superseded: Early forms of the model estimated the urban-core population share and the core-to-statewide-concentration ratio and applied an amplification factor of 1.6 derived from a region-level allocation model tested in two states. Both are replaced by measurement. The measured conversion rate averages 0.70 and ranges from 0.14 to 0.98.

CONTROL OF THE MAP

- Each state is assigned a probability that a stated actor controls congressional map-drawing in 2031, based on current trifecta status, structural chamber lean, and governorship.
- Least certain: Wisconsin, Minnesota, and Pennsylvania, at 55 to 60 percent.
- California: Proposition 50 (November 2025) suspended the Citizens Redistricting Commission for congressional maps through 2030. The commission is scheduled to resume for 2031; assigned 70 percent. If it does not resume, subtract roughly four to five Republican seats.
- Texas: assigned 85 percent. Congressional maps come from the legislature.

LEGAL FRAMEWORK

- *Louisiana v. Callais*, 608 U.S. 85 (2026), 6–3, decided April 29, 2026. Section 2 liability now requires a strong inference of intentional discrimination rather than disparate impact; illustrative maps must satisfy all of the state's legitimate districting objectives, including its stated political goals, without race predominating; and evidence of racially polarized voting must control for partisan affiliation.

- *Evenwel v. Abbott*, 578 U.S. 54 (2016), held that states may use total population and expressly reserved whether they may use citizen population. The citizen-population premise assumes that reservation resolves permissively. It has not been resolved.
- Scope qualification: *Evenwel* concerned Texas state legislative districts under the Equal Protection Clause. This model applies its reservation to congressional districts, where *Wesberry v. Sanders* grounds equality in Article I, Section 2—arguably a stricter person-based rule than the Fourteenth Amendment analysis *Evenwel* applied. The citizen base is a harder case for congressional maps than for legislative ones, and the model does not treat the two as equivalent.
- Scope of the districting stage: The Callais holding is applied only in states where Republicans control map-drawing. No corresponding gain is credited to Democratic mapmakers in any state. This isolates the effect on Republican-controlled maps rather than modeling a nationwide doctrinal shift, and is deliberately conservative.

BASELINE FOR COMPARISON

- The current-House column is the delegation as elected in November 2024: 220R–215D. The seated House as of August 2026 is 218R–214D with three vacancies; the 2024 result is used because a vacancy is not a partisan property of a district.
- Ten states enacted new congressional maps between the 2024 and 2026 elections: Alabama, California, Florida, Louisiana, Missouri, North Carolina, Ohio, Tennessee, Texas, and Utah. The current-House column does not reflect them.

CALIBRATION

- The ceiling gives Republicans 60.0 percent of seats on the same 51.2 percent seat-weighted two-party vote share—a bonus of roughly nine points, which exceeds anything in modern experience. It is a ceiling, not a forecast. The ceiling incorporates both quantitative modeling and expert judgment about what aggressive redistricting may achieve. It should not be interpreted as a demonstration that every modeled district can be drawn simultaneously. Actual map-drawing constraints may reduce the achievable total in individual states. Georgia presents the largest identified uncertainty: The model assigns an aggressive Republican ceiling that is higher than several quantitative feasibility checks would independently support. Other states carry uncertainty in both directions, and the testing done so far does not resolve it. Within-county variation in partisan composition makes aggressive lines easier to draw than a county-level model suggests; contiguity limits and metropolitan areas with no adjacent rural territory make them harder. Applied across the states where the underlying data have been measured, the 56–58 percent drawing standard used here produces totals both above and below the published ceiling, depending on where within that band a mapmaker actually draws. Georgia is the exception, falling short at every point in the band. The net direction of error is therefore unquantified, and this primer does not claim the offsetting risks cancel. None of the seats in the ceiling column has been drawn as an actual map, which is the only way the question could be settled. The figure should be read as the upper bound of what the stated assumptions permit, not as a validated total.

The single seat by which the ceiling rises under the proposed apportionment base falls in Georgia, which is the state this caveat identifies as least supported by the feasibility checks.

LIMITATIONS

- The ceiling assumes that every legislature holding the pen draws to its durable maximum in the same cycle, that no map is struck down, and that no chamber changes hands in 2028 or 2030. No decade has produced that combination. It also includes two seats that Republican legislatures attempted and failed to draw in 2025 and 2026.
- Maps drawn aggressively are efficient rather than safe. The same design that raises the ceiling lowers the floor: Under a uniform national swing toward Democrats the projection erodes, with crossover at roughly D+7 and a steeper collapse beyond it.
- The districting stage is reported as a single figure. Because its mechanisms interact, a split into separate components depends on the order the effects are applied and is not separately reportable.
- The last seat is not resolvable. Georgia's fifteenth seat holds the 435th position by a margin of 0.00 percent of a priority value; California's forty-eighth sits 0.13 percent behind it and South Carolina's eighth 0.34 percent. On the other side, Tennessee's tenth is held by 0.32 percent and Illinois's sixteenth by 0.82 percent. Texas's forty-second falls 1.45 percent short. No projection five years out can resolve differences that small.
- The conversion of district weight to seats uses a seat-probability threshold near 50 percent of the two-party vote, smoothed across 45–55 percent. That threshold is a modeling choice, not a measurement, and it is the principal remaining judgment in the citizen-only component.
- Thirteen states are measured directly for that component, with the remainder extrapolated at the blended rate.