



**SOUTHERN
CENTER FOR
HUMAN
RIGHTS**

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July 20, 2016

Karen Humes
Chief, Population Division
U.S. Census Bureau
Room 6H174
Washington, DC 20233

Dear Chief Humes,

The Southern Center for Human Rights (SCHR) submits this comment in response to the Census Bureau's Federal Register Notice regarding the Residence Rule and Residence Situations, 81 FR 42577 (June 30, 2016).

The Southern Center for Human Rights (SCHR) is a nonprofit law firm based in Atlanta, Georgia, dedicated to providing legal representation to people facing the death penalty, challenging human rights violations in prisons and jails, seeking through litigation and advocacy to improve legal representation for poor people accused of crimes, and advocating for criminal justice reform on behalf of those affected by the system in the Southern United States.

In the course of carrying out our work, it has become increasingly clear that it is imperative to end prison gerrymandering so that we may ensure equal representation throughout Georgia. **SCHR urges you to count incarcerated people at their home address, rather than at the particular facility that they happen to be located at on Census day.**

According to the Georgia Department of Corrections, the average person in the state prison system has been transferred 4 times and the median time they spent at the current facility is just 9 months.¹ The data makes it clear that the most prison populations are transient. After being shuffled throughout a number of facilities over the course of their incarceration, people return to the communities where they have enduring ties, and that's where they should be counted – at home.

The Bureau's failure to update its rules regarding incarcerated persons is particularly troubling given that the Bureau has decided that other populations – deployed overseas military and juveniles staying in residential treatment centers – should be counted in their home location.

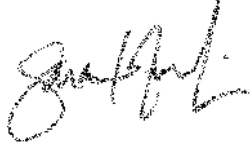
Georgia has one of the highest incarceration rates in the United States, currently imprisoning more than 1 person for each group of 200 people. Counting them in the wrong place is not an error that can be overlooked. There are significant differences between the places that most incarcerated individuals come from and the places where they are imprisoned. For example, an analysis by the Department of Corrections found more people in Georgia prisons come from Atlanta zip code 30318 than any other of the

¹ *Inmate Statistical Profile*, pages 35 and 39, Georgia Department of Corrections, (July 1, 2016), available at http://www.dcor.state.ga.us/sites/all/themes/gdc/pdf/Profile_all_inmates_2016_06.pdf

965 zip codes in state. The Census' refusal to count our residents at home negatively impacts our communities.

Thank you for this opportunity to comment on the proposed Residence Rule and Residence Situations. We urge the Bureau to acknowledge the transient nature of modern incarceration and to count incarcerated people as residents of their home address.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Totonchi". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping underline.

Sara Totonchi
Executive Director