



CITY OF PHILADELPHIA
CITY COUNCIL

DEREK S. GREEN
ROOM 594, CITY HALL
Philadelphia, PA 19107
(215) 686-3450 or 3451
Fax No. (215) 686-2013

COUNCILMAN AT-LARGE

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

Dear Chief Humes,

The undersigned members of Philadelphia City Council submit 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 Bureau's proposal to continue counting incarcerated people at the particular facility where they happen to be located on Census Day ignores the reality of incarceration: prisons are not a "usual residence."

As elected representatives of communities disproportionately impacted by incarceration, many of our constituents are incarcerated in facilities across the state, and beyond. When our constituents are incarcerated, they are often sent to prisons outside of the City, but they and their children still rely on us for representation.¹

Over the course of their incarceration, prison administration may move these citizens between different prisons, but they remain our constituents. Their homes in our district remain their only stable, permanent, "usual" residence. Counting them as if they were residents of the facility where they happen to be held on Census Day does not reflect the modern lived reality of our communities.

We note that your proposed method of counting the incarcerated population is inconsistent with how you count other groups that eat and sleep in a location that is not their usual residence. For example, your

¹ This duty is even written into statute: "For the purpose of registration and voting, no individual shall be deemed to have gained a residence by reason of presence or lost a residence by reason of absence... [while] in an institution at public expense." (25 Pennsylvania Consolidated Statutes §1302(iii).)

proposed rules will count boarding school students at their home addresses even if they spend most of their time at school. The same approach should be taken when counting incarcerated people.

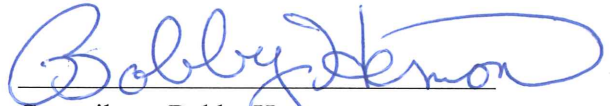
We are also concerned about the impact of the proposed residence rules on racial justice in our City, the Commonwealth, and the nation. Almost a quarter of the people in the state's prison system are from Philadelphia, but almost all are incarcerated outside of our City. Because the prison population is disproportionately Black and Latino, crediting this population to the incorrect – and majority White – parts of the state undermines the political power of our communities.

Thank you for this opportunity to comment on the Residence Rule and Residence Situations as the Bureau strives to follow the residence rule to count everyone in the right place. As elected representatives, we are keenly aware that democracy, at its core, rests on equal representation. And equal representation, in turn, rests on an accurate count of the nation's population. In order to produce an accurate 2020 Census, the Bureau must count incarcerated people at home.

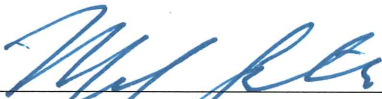
Sincerely,



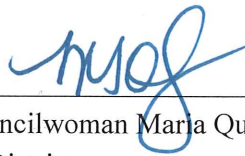
Council President Darrell Clarke
5th District



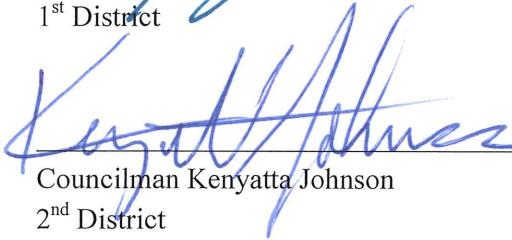
Councilman Bobby Henon
6th District



Councilman Mark Squilla
1st District



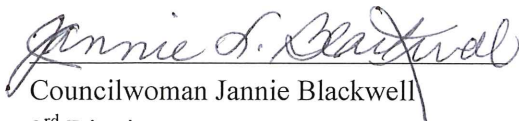
Councilwoman Maria Quiñones-Sanchez
7th District



Councilman Kenyatta Johnson
2nd District



Councilwoman Cindy Bass
8th District



Councilwoman Jannie Blackwell
3rd District



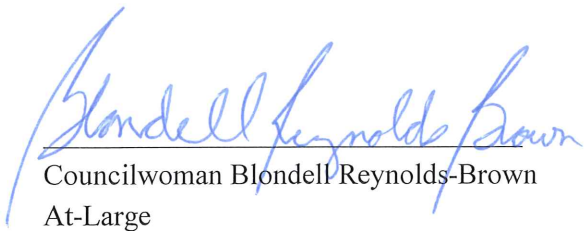
Councilwoman Cherelle Parker
9th District




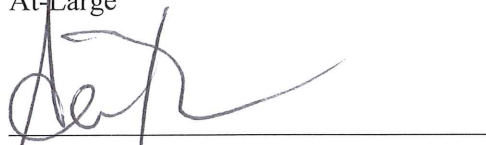
Councilman Curtis Jones, Jr.
4th District





Councilman Brian O'Neill
10th District



Councilwoman Blondell Reynolds-Brown
At-Large

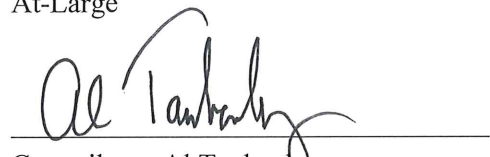

Councilman Bill Greenlee
At-Large


Councilman Allan Domb
At-Large


Councilman Derek Green
At-Large


Councilwoman Helen Gym
At-Large


Councilman David Oh
At-Large


Councilman Al Taubenberg
At-Large