

August 31, 2016

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

Dear Ms. Humes,

I am writing to you in response to the Census Bureau's federal register notice regarding the Residence Rule and Residence Situations, 81 FR 42577 (June 30, 2016). In the first paragraph below I share experiences that inform my opinion on this issue, and then turn to three reasons I am concerned about the Bureau's proposed decision.

Background: My first job after graduating from college in 1971 was to work as a correctional officer at the Connecticut State Prison for Women. I have spent much of my life since then working in, teaching about, and researching prisons. Currently I am the director of the higher education program at the Indiana Women's Prison, with approximately 15% of the women at the prison enrolled in my program. In addition, I am a long-serving member of the Community Advisory Board for Putnamville Correctional Institution, a large state prison in the rural Indiana county that has been my home for 30 years. Finally, over the past 20 years I have frequently testified before various committees of the Indiana General Assembly on a variety of issues related to prisons, the criminal justice system, and local government redistricting and have had hundreds of conversations with legislators about these issues.

1) People in prison do not regard the institution where they are incarcerated as their home, even for the small number of people who have lived there and/or other prisons for most of their adult lives. If you ask them where "home" is, they will

almost always tell you where they lived prior to incarceration or where their parents/children/significant others live now. Never once can I recall an adult who thought of their current prison as their home.

2) The specific prison in which any one person is held is usually arbitrary and transient. The average length of stay at the Indiana Women's Prison is 19 months, but the median stay is much shorter. Women are constantly cycling in and out of the prison, usually because their sentences are fairly short, but also because they can be transferred at any time to one of the other two women's prisons in the state. This transience is experienced even more by men in Indiana, as they are shuffled among 23 prisons.

3) Neither the voters in surrounding electoral districts nor elected officials from those districts consider people imprisoned in their communities to be fellow citizens or constituents and they do not take the interests of those prisoners into account when casting ballots or carrying out their official duties. Counting disenfranchised prisoners as residents of their prison in effect transfers their votes to voters in the surrounding electoral districts (county/city council, legislative, or Congressional). Not only do these voters not take the interests of the prisoners into account, they may be more hostile to people in prison than the average voter in the county or state. (Legislators from upstate New York are an excellent example, but so is my own rural Indiana county which houses a major state prison and where I have rarely heard a resident express concern about the needs or interests of men in the prison.) Equally important, elected officials do not see prisoners incarcerated in their electoral districts as their constituents. In a 2003 [survey of legislators](#) in Indiana, not a single legislator said they considered someone incarcerated in their district to be their constituent. By contrast, were people in prison to be counted as residents of their own home districts, the odds that at least some voters and their elected representatives would share the

electoral interests of the incarcerated rises dramatically.

Sincerely yours,

Kelsey Kauffman