



PRESIDENT
Anne Connell-
Freund

**PRESIDENT
ELECT**
Ellen Donnarumma

**IMMEDIATE PAST
PRESIDENT**
Phil Nunes

TREASURER
Stephen Lanza

SECRETARY
Heather Lumley

**Regional Vice
Presidents**

Anthony Corso
Jerry Butler
Heather Andrews
David Johnson
Cristi Payne
Sheryl Fisher
Rob Edmisten
Jeanine Webber
Shawn Bayes
Vicki Trebian
Arthur Hill
Steve Woolworth
Kim Sanderson
Heather Kerr

Past Presidents

Sonya Spencer
Rick Billak
Donald Evans
James Hemm
John Larivee
James Lawrence
Terry Marshall
Jane
O'Shaughnessy
Denise Robinson
J. Bryan Riley
Neil Tilow
Anne Walker
Kevin Downey

Dear Karen Humes,

The International Community Corrections Association submits this comment in response to the Census Bureau's federal register notice regarding the Residence Criteria and Residence Situations, 81 FR 42577 (June 30, 2016). The Bureau's proposal to continue counting incarcerated people at the particular facility that they happen to be located at on Census day ignores the realities of incarceration and people's connection to their community. The Bureau's proposal would mean another decade of decisions based on counting incarcerated people in the wrong place.

The ICCA, as a private, non-profit, membership organization, acts as the representative voice for residential and other community corrections programs. As such, it expects of its members compassion, belief in the dignity and worth of human beings, respect for individual difference and a commitment to quality care for its clients. Given these values, we were disappointed to hear that the Bureau proposed to once again lump all incarcerated people together and count them at the facility where they happen to be located on Census day rather than at counting them where they all individually live.

Our primary goal is the successful re-integration of the client into the community after their temporary stay in a correctional facility. Our 50 years of experience working toward that goal makes it clear that the way the Bureau counts incarcerated people does not match the realities of incarceration in this country.

Counting incarcerated people at the location of the prison they temporarily happen to be in on Census day, instead of at home creates an inaccurate portrait of their home communities (as well as the areas where facilities are located). State, localities, and our member agencies rely on Census data, so when the data is flawed, their policy decisions are based on a distorted reality.

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. My organization believes that in order to produce an accurate 2020 Census, the Bureau must count incarcerated people at home.

Sincerely,

Anne Connell-Freund
ICCA President