



67TH DISTRICT
STATE CAPITOL
P.O. BOX 30014
LANSING, MI 48909-7514
PHONE: (517) 373-0587
FAX: (517) 373-9430
E-MAIL: tomcochran@house.mi.gov

MICHIGAN HOUSE OF REPRESENTATIVES

TOM COCHRAN
STATE REPRESENTATIVE

July 20, 2016

Dear Karen Humes,

I represent Michigan's 67th House District and 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 they are located at on Census Day ignores the reality of incarceration: prisons are not a "usual residence."

As an elected representative, I am keenly aware that democracy, at its core, rests on equal representation. Equal representation, in turn, rests on an accurate count of the nation's population. The reality is that when my constituents are incarcerated, they are often sent to prisons outside my district, but they still rely on me for representation. Over the course of their incarceration, prison administrators may move them between different prisons, located throughout many of my colleagues' districts, but they continue to be my constituents. Their home in my district remains their only stable and permanent residence. Counting them as residents of the facility where they are held on Census day does not reflect the modern reality of our communities.

I note that your proposed method of counting the incarcerated population is inconsistent with how you count other groups that temporarily reside in a location other than their usual residence. For example, one proposed rule 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 our nation's incarcerated individuals.

I am also concerned about the impact of your residence rules on racial justice in my state. The State of Michigan disproportionately incarcerates African-American and Latino populations, so when counted in the wrong locations and legislative districts are drawn accordingly, it further undermines the political power of minority communities.

Thank you for this opportunity to comment on the Residence Rule and Residence Situations as the Bureau strives to count everyone in the right place. I believe that in order to produce an accurate 2020 Census, the Bureau must count incarcerated people at home.

Sincerely,

Tom Cochran
State Representative
House District 67