July 19, 2016

Karen Holmes, Chief  
Population Division  
US Census Bureau  
Room 5H 174  
Washington, DC 20233

Dear Karen Holmes,

The New Jersey Association on Correction submits this comment in response to the Census Bureau’s Federal Register notice regarding the Residence Rules and Residence Situation 81FR 42577(June 30, 2016). The Association urges you to count incarcerated people at their home address rather than the particular facility that they happen to be located on Census day. If we count juveniles in residential programs, students in Boarding Schools and military personnel with overseas assignments in their home addresses we should do the same for those incarcerated.

We currently incarcerate more than 2,000,000 individuals in the US. By designating a prison cell as a residence in the 2010 census, the Census Bureau concentrated a population that is disproportionately male, urban, and African American or Latino into just 5393 Census Blocks that are located far from the actual homes of the incarcerated people. When this data is used for redistricting, prisons inflate the political power of those who live near them. This also serves to make the Census less accurate.

When this issue was opened for comment in 2015, 96% of the comments received by the Census Bureau supported the idea of counting individuals at their home not at the prison cell they currently occupied. I was hopeful that this kind of support would result in a positive response from the Bureau. I was disappointed to learn otherwise.

Thank you for the opportunity to comment on the Bureau’s efforts to count everyone in the right place. The Association believes in a population count that is accurate. We urge you to count the incarcerated as residents of their home addresses and not the prison community they happen to be in on Census day.

Thank you for your consideration
Sincerely,

Angel Perez  
Executive Director

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