

Partnership for Safety and Justice

825 NE 20th Ave, Suite 250

Portland, OR 97232

August 9, 2016

Karen Humes, Chief,

Population Division

U.S. Census Bureau, Room 6H174,

Washington, DC 20233

Re: Proposed 2020 Census Residence Criteria and Residence Situations

Dear Ms. Humes:

Partnership for Safety and Justice (PSJ) submits 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). We would strongly recommend that incarcerated people be recorded by the Bureau as residing in their home communities – not as residents of the locations where they are imprisoned. If made final, the Bureau's current proposal will mean another decade of decisions based on Census results that count incarcerated people in the wrong place and in a manner that negatively impacts crime victims, people convicted of crime, and the families and communities of both.

As an organization, in large part, dedicated to supporting services and programs for victims of crime, we find the current proposal to be problematic for at least two reasons. First, we are very concerned that individuals and communities with high crime rates are being doubly victimized (a) by the person who harmed them and (b) by the current census methodology, which fails to include individuals, frequently from their own community, who are sent to another location to serve a term of incarceration.

Second, as an organization likewise dedicated to ensuring the ability of formerly

incarcerated people to be fully counted in and participate in civic and economic life, PSJ also believes that people held accountable for crime should be tallied in their home communities. Counting incarcerated people as residing where their prison is located, rather than their home communities, skews the census result by failing to count residents who were transported involuntarily from their home community and, in the majority of instances, will return to that home community long before the next census. The current method also dilutes the local census in terms of accurately counting residents who are people of color – a population disparately removed from their home communities and placed in state and federal prison.

Crime victims and people who commit crimes almost invariably come from the same communities. Undercounting the residents of these communities – and, worse, inaccurately counting them as the residents of communities where they are imprisoned – harms crime victims, people convicted of crime, their families and community alike. We urge the Bureau to count people as residing in their home communities, not where they are incarcerated.

Thank you for this opportunity to comment on the proposed Residence Rule and Residence Situations.

Sincerely,

Andrew Ko, Executive Director

Partnership for Safety and Justice

Hardcopy: Sen. Jeff Merkley