



**Integrated Justice Alliance**  
Transforming systems and people.

Karen Humes, Chief, Population Division  
U.S. Census Bureau, Room 5H174  
Washington, DC 20233

July 10, 2015

Dear Karen Humes:

The Integrated Justice Alliance of New Jersey submits this comment in response to the Census Bureau's federal register notice regarding the Residence Rule and Residence Situations, 80 FR 28950 (May 20, 2015). The Integrated Justice Alliance urges you to count incarcerated people at their home address, rather than at the particular facility that they happen to be located at on Census day.

The Integrated Justice Alliance of New Jersey (IJA) is a statewide network working toward a fair and effective criminal justice system: one that promotes public safety and the restoration of individuals and families, protects and safeguards the rights of individuals in state custody, promotes transparency and ensures accountability, and spends taxpayer dollars wisely. Our website: <http://www.integratedjusticealliance.org/>

The IJA is dedicated to ending prison gerrymandering in order to ensure equal representation across our state. In 2011, members of the IJA gave testimony before the Apportionment Commission of New Jersey in Toms River (1-29-2011), Newark (2-9-2011), and Jersey City (2-11-2011) to request that we count incarcerated people fairly as residents of their home communities and not in the communities where they are incarcerated. We also gave testimony on May 14, 2012 before the New Jersey Senate State Government, Wagering, Tourism, and Historic Preservation Committee in support of Senate Bill 1055: Ending Prison-Based Gerrymandering in New Jersey. The IJA was also one of more than 200 signators of a letter to Census Bureau Acting Director Thomas Mesenbourg (of February 14, 2013), requesting that the Census Bureau count incarcerated persons at their home address.

As you know, American demographics and living situations have changed drastically in the 225 years since the first Census, and the Census has evolved in response to many of these changes in order to continue to provide an accurate picture of the nation. Today, the exponential growth in the prison population of the past 30 years requires the Census to update its methodology again.

The need for change in the "usual residence" rule, as it relates to incarcerated persons, has been growing over the last few decades. As recently as the 1980s, the incarcerated population in the U.S. totaled less than half a million. But since then, the number of incarcerated people as more



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than quadrupled, to over two million people behind bars. The manner in which this population is counted now has huge implications for the accuracy of the Census.

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 5,393 Census blocks that are located far from the actual homes of incarcerated people. In New Jersey, the state's prison population comes disproportionately from certain counties: Essex County (Newark) is home for less than 9% of the state, but 16% of its incarcerated people; Camden County (Camden) is home for 6% of the state, but 12% of its incarcerated people. Crediting the state's incarcerated population to the census blocks that contain the state's 13 correctional facilities serves to enhance the weight of a vote cast in those 13 districts, while diluting the votes cast in every other district.

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 in keeping with changes in society and population realities. Because the Integrated Justice Alliance of New Jersey believes in a population count that accurately represents all communities, we urge you to count incarcerated people as residents of their home address.

Sincerely,

Rick Greenberg, Chair  
IJA Prison Gerrymandering Committee  
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