

July 16, 2015

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

Dear Ms. Humes,

I submit 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). I urge you to count incarcerated people at their home address, rather than at the particular facility that they happen to be imprisoned at on Census day.

My son is incarcerated in Texas, and I am a member of the Mothers of Incarcerated Sons Society, a support group for families of incarcerated individuals.

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 growth in the prison population 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 has more 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 Rhode Island, this practice has a disproportionate effect on African-American and Latino communities since African-Americans are incarcerated at a rate almost nine times as much as Whites are. The incarceration rate for Latinos in Rhode Island is three times higher than that for Whites.

Currently, four states (California, Delaware, Maryland, and New York) are taking a state-wide approach to adjust the Census' population totals to count incarcerated people at home and avoid prison gerrymandering, and over 200 counties and municipalities all individually adjust population data to avoid prison gerrymandering when drawing their local government districts.

Unfortunately, this is not the case in Rhode Island. Even though Rhode Island law states that a prison cell is not a residence, incarcerated people are included in population counts for redistricting. This is worrisome because currently, all of the state's prisons are clustered in Cranston.

Thank you for this opportunity to comment on the Residence Rule and Residence Situations. I am glad to see that the Bureau is taking a step forward to count everyone in the right and most accurate place. I believe that the Census should accurately represent communities, and therefore I urge you to count incarcerated people as residents of their home address.

Sincerely,

A handwritten signature in cursive script that reads "Joanne S. Jones".

Joanne S. Jones, OTD, OTR/L
6 General Hawkins Drive
Warwick, RI 02888