July 17th, 2015

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

Re: 2010 Census Residence Rule and Residence Situations

Dear Ms. Humes:

The Latino and Puerto Rican Affairs Commission (LPRAC) was created by an act of the Connecticut General Assembly in 1994. In essence, we are a 21 member non-partisan commission mandated by state law to make recommendations to the legislature and the Governor of Connecticut for new or enhanced policies that will foster progress in achieving health, safety, educational success, economic self-sufficiency, and end discrimination for the Latino community in our state. LPRAC conducts educational and outreach activities to strengthen connections across the state’s Latino population, establishing innovative partnerships, listening to stakeholders on issues particularly impacting the Latino population, and conducting wide-ranging socioeconomic research to fill gaps in the state’s data collection and provide policy makers with comprehensive, up-to-date statistical information from which to develop effective and responsive laws, regulations, policies and procedures.

We strongly recommend that residence rules should be changed in the 2020 census for People in Correctional Facilities for Adults and People in Juvenile Facilities. The current residence rules and residence situations adversely affect the political representation of Hispanics in Connecticut.

For example, in the town of Somers, CT, the prison population accounts for 20 percent of the total population. Furthermore, 24 percent of prisoners in Somers are Hispanic. There are approximately 535 Hispanic prisoners in Somers but only 150 Hispanic residents who are not in the prison population. Consequently, the Hispanic prison population in Somers outnumbers Hispanic residents by over 250 percent. Furthermore, most of the Hispanic prisoners in Somers come from urban areas such as Hartford and Bridgeport, while Somers is a predominately-white rural town.

1 ACS 2013 5yr B01001
2 CT Dept. of Corrections April 2015
3 ACS 2013 5yr B11002i
Because of the current practice of counting prisoners at their prison location, political representation for residents of Somers is artificially increased when legislative district boundaries are drawn for state senators and representatives. In order to stop this skewing of political representation, we ask that the residence rules and residence situations for People in Correctional Facilities for Adults be changed as follows:

(a) **People in correctional residential facilities on Census Day:** Prisoners with a household residence in Connecticut should be counted at the location of their household residence. Prisoners with a household residence outside Connecticut should be counted at the correctional residential facility.

(b) **People in federal detention centers on Census Day:** Prisoners with a household residence in Connecticut should be counted at the location of their household residence. Prisoners with a household residence outside Connecticut should be counted at the federal detention center.

(c) **People in federal and state prisons on Census Day:** Prisoners with a household residence in Connecticut should be counted at the location of their household residence. Prisoners with a household residence outside Connecticut should be counted at the location of the federal or state prison.

(d) **People in local jails and other municipal confinement facilities on Census Day:** Prisoners with a household residence in Connecticut should be counted at the location of their household residence. Prisoners with a household residence outside Connecticut should be counted at the location of the local jail or the municipal confinement facility.

For **People in Juvenile Facilities**, residence rules should be similarly changed as follows:

(a) **People in correctional facilities intended for juveniles on Census Day:** Juveniles with a household residence in Connecticut should be counted at the location of their household residence. Juveniles with a household residence outside Connecticut should be counted at the correctional facility.

(b) **People in group homes for juveniles (non-correctional) on Census Day:** Juveniles with a household residence in Connecticut should be counted at the location of their household residence. Juveniles with a household residence outside Connecticut should be counted at the group home.

(c) **People in residential treatment centers for juveniles (non-correctional) on Census Day:** Juveniles with a household residence in Connecticut should be counted at the location of their household residence. Juveniles with a household residence outside Connecticut should be counted at the residential treatment center.

These recommended changes to residence rules and residence situations will not affect congressional reapportionment; however, it will end the existing over-representation in state legislatures of communities with group quarters such as correctional and juvenile facilities. Furthermore, in Connecticut most of the communities with these types of facilities have a predominately-white population while the prison and juvenile facilities located in these communities are disproportionately Hispanic. These suggested changes in residence rules and residence situations will end the current dilution of political representation in Connecticut’s predominately-Hispanic urban areas.

Sincerely,

Werner Oyanadel

Executive Director
Latino and Puerto Rican Affairs Commission