



ALEKS KAJSTURA

Senior Policy and Advocacy Analyst  
phone: (413) 527-0845 ext. 304  
email: akajstura@prisonpolicy.org

PO Box 127  
Northampton, Mass. 01061

www.prisonpolicy.org  
www.prisonersofthecensus.org

March 5, 2026

Re: Comment in response to 91 FR 4864,  
Docket Number USBC-2026-0034

Addressing: testing enumeration of people in correctional facilities

The Prison Policy Initiative submits this comment in response to the Census Bureau's federal register notice requesting comment on the 2026 Operational Test in Support of the 2030 Census, 91 FR 4864 (Feb. 2, 2026). Thank you for this opportunity to highlight how cutting group quarters from the 2026 Census Test will impede the Bureau's ability to accurately enumerate people in correctional group quarters in the 2030 Census.

### **The Bureau must include group quarters in the 2026 Census Test**

The revised 2026 Census Test appears to be limited to housing units – making no mention of any plans to test group quarters enumeration. People in group quarters account for 3% of the US population; therefore, an accurate 2030 Census requires an accurate count of people in group quarters. The Bureau cannot simply rely on old methods, which have failed it over the past decades. For example, the Bureau's group quarters enumeration failed so badly in the 2020 Census that the Bureau had to officially impute populations in group quarters for the first time in a decennial census.<sup>1</sup>

Even if the Bureau were to test group quarters enumeration at the two remaining sites, it would be insufficient to prepare for an accurate count in 2030. The new plan to use only two test sites (Huntsville, AL, and Spartanburg, SC) would still cut 10 correctional facilities, including the only state prison, and both facilities that hold over 1,000 people. These cuts would represent removing 67% of the correctional population from

---

<sup>1</sup> For the GAO's full analysis, see *Coverage Errors and Challenges Inform 2030 Plans*, available at <https://www.gao.gov/products/gao-25-107160>

the test. That would result in the Bureau testing its entire enumeration of group quarters on just 4 small facilities – mostly county jails.

Tests performed in these small local facilities would not be representative of the Bureau's challenge in counting the nation's 2 million incarcerated people – over half of whom are incarcerated in state prisons.<sup>2</sup>

In fact, the Bureau itself identified the Colorado Springs site – now cut – for testing group quarters enumeration in general, and "favorable for implementing and evaluating new automated group quarter procedures with correctional facilities...."<sup>3</sup>

The Bureau's current plan to focus solely on household units will do nothing to prepare the Bureau for enumerating people in group quarters in 2030.

These concerns are not theoretical. The Bureau has a decades-long pattern of failing to accurately enumerate people living in correctional group quarters. Commerce Secretary Lutnick's recent remarks before the Senate subcommittee on Commerce, Justice, Science, and Related Agencies exemplify the Bureau's current path to repeat those mistakes again in 2030. Secretary Lutnick explained away the additional test sites as unnecessary when the Bureau will be testing using the Postal Service for enumeration, stating that the USPS "already know where everybody lives" because "they go to 169 million homes every day".<sup>4</sup> Even if that is true for households, it certainly is not true for group quarters. A postal worker may be able to identify a prison along their route, but that does little for the Bureau's capability of counting the hundreds or thousands of people behind the prison walls.

The Bureau has a long history of inaccurately counting incarcerated people and conducting a full 2026 Census Test across all six test sites is the bare minimum to correcting course in 2030.

---

<sup>2</sup> For a full breakdown of the nation's broad range of facility types, see our report, *Mass Incarceration: The Whole Pie 2025*, available at <https://www.prisonpolicy.org/reports/pie2025.html>

<sup>3</sup> *Transcript: 2030 Census Webinar: 2026 Census Test Site Selection* (page 14), available at <https://www.census.gov/content/dam/Census/newsroom/press-kits/2024/20240722-script-webinar-2026-census-test-site-selection.pdf>

<sup>4</sup> *Testimony before the US Senate Committee on Appropriations' subcommittee on Commerce, Justice, Science, and Related Agencies*, Tuesday, February 10, 2026. Video available at <https://www.appropriations.senate.gov/hearings/a-review-of-broadband-deployment-funding-at-the-department-of-commerce> (relevant portion of the testimony starting at 1:23:06)

## **The Bureau’s mistakes create incorrect race and ethnicity data**

The concentrated populations in group quarters, particularly the correctional facilities, magnify otherwise-insignificant errors. A single input error can flip the race characteristics of thousands of people, as the Bureau did in reporting 2020 Census populations for the blocks containing Angola Prison in Louisiana.<sup>5</sup>

The prison accounts for a third of the Parish’s census population, so any population data reported for the prison will heavily influence the demographic picture of the parish. The 2020 Census counted over 4,000 Black people incarcerated at Angola as if they were white. At that time, white people actually accounted for less than a quarter of Angola’s population. Not only does such an error further distort the demographic data of the surrounding parish, but it blatantly obscures the disproportionate toll that mass incarceration places on Black communities.

## **The Bureau routinely misplaces correctional facilities**

During the 2020 count, the Census Bureau counted at least one prison or jail in every state in the wrong place. Most of the populations counted erroneously were small, but occasionally, the census reported hundreds or thousands of incarcerated people in the wrong place. Here are just a few examples from a single state, New York.

The Census Bureau didn’t count any people at Adirondack Correction Facility — a place that holds about 300 incarcerated people. However, roughly the same number of incarcerated people were counted in a state forest about 175 miles away<sup>6</sup> instead.

Woodbourne Correctional Facility appears to have been counted twice — once in its actual location,<sup>7</sup> and also in the empty field<sup>8</sup> next door.

Empty fields are a common place for the Census Bureau to mistakenly report correctional populations. In Wyoming County, N.Y., rather than counting them in the facility where they were confined, the Bureau counted nearly a thousand incarcerated people in a field,<sup>9</sup> and another group of over 800 was reported just across the street from their facility’s location — also in empty fields. This is a perennial problem

---

<sup>5</sup> The full accounting of the block populations is presented in *Post Census Group Quarters Review--Comment by Andrew A. Beveridge*, available at <https://www.regulations.gov/comment/USBC-2021-0025-0027>

<sup>6</sup> Block 36 065 024400 3084

<sup>7</sup> Block 36 105 951100 2012

<sup>8</sup> Block 36 105 951100 2015

<sup>9</sup> Block 36 121 970600 3018

with the census. In the 2000 Census, the Bureau reported nearly 1,800 incarcerated people — likely from the Wyoming Correctional facility in a random field<sup>10</sup> halfway across the county.

These examples are all just from a single state, and these problems are not confined to New York. When the Bureau counts even a single facility in the wrong place, it drops thousands of people into an arbitrary location. The scope of the problem becomes clear when considering that these miscounts and misallocations exist in every state.<sup>11</sup>

### **Two factors combine for an inaccurate count of incarcerated people**

Apart from placing prisons in the wrong place, the Census Bureau counts incarcerated people in the wrong place at a more basic level — in a prison or jail cell — instead of in their actual communities.<sup>12</sup> Over the course of the last few decades, over 200 local governments and a growing number of states have taken steps on their own to correct Census data to count incarcerated people at home. Nearly half of the US population now lives in a place that corrects redistricting data they receive from the Census to avoid prison gerrymandering – the practice of inadvertently giving residents of districts with correctional facilities greater political clout at the expense of everyone else.

States and local governments have spent over two decades trying to fix this problem, but that work is undermined when the Bureau routinely mistakenly and unknowingly places prisons and jails in the wrong location in its data or dramatically miscounts them.

---

<sup>10</sup> Block 36 121 990600 1027

<sup>11</sup> You can browse through all the errors noted in our annotations of 2020 Census correctional populations in our “Correctional Facility Locator 2020” tool, available at <https://www.prisonersofthecensus.org/locator2020/> and searchable by state. Or in the meantime, here are two more examples:

- In Michigan, the Kalamzoo County Jail was expected to have a population of at least 400 people; the Office of the Sheriff states that, “The jail regularly supervises over 400 inmates.” Yet, Block 26 077 001801 1000, clearly located at the Sheriff’s office and jail, counts only 27 incarcerated people. The only other block in the vicinity with any incarcerated population has only 12 incarcerated people counted in it.
- Conversely, in North Carolina, Block 37 165 010400 1004 is clearly located at Scotland Correctional Institution and counts 2,515 incarcerated people at that facility. North Carolina’s DPS website states that Scotland CI has a maximum capacity of 1,756. According to North Carolina DPS’s custom offender reports, there were 1,654 people in Scotland CI on June 30, 2020. There are no other facilities or blocks nearby to which the missing 1,000 people were attributed.

<sup>12</sup> For our analysis of how the Bureau misapplies its residence criteria to incarcerated people, see our *Comment in response to 87 FR 50599*, available at <https://www.regulations.gov/comment/USBC-2022-0004-1283>

When we examined 2020 Census data to better understand the extent of the Bureau's errors in enumerating correctional group quarters, we found that these were not rare mistakes; they are perpetuated across the country and across the decades. The solution is clear: by counting incarcerated people as residents of their homes the Census Bureau would minimize technical inaccuracies while also ending prison gerrymandering. At this point in the decade, and particularly given the Bureau's current testing trajectory, we acknowledge that counting incarcerated people at home in the 2030 Census is unlikely. However, the Bureau can still take steps to improve its enumeration of people within correctional facilities by including group quarters in its 2026 Census Test as originally planned.

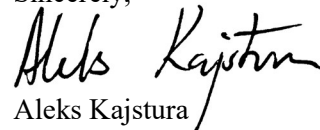
**The Bureau needs to include group quarters in the 2026 Census Test to ensure an accurate 2030 Census**

When the Bureau counts an entire prison or jail — which can account for hundreds or thousands of people — in the wrong place, it has a big impact.

By creating a false picture of the population in a facility, it also makes it harder for states ending prison gerrymandering to comply with voting rights laws that require accurate race and ethnicity data for drawing districts.

Without testing improved enumeration methods for correctional facilities, the Bureau is destined to repeat the errors of past decades again in 2030. We urge the Bureau to resume testing in the original six sites and to reinstate group quarters — particularly correctional facilities — in those tests to lay the groundwork for an accurate 2030 Census.

Sincerely,



Aleks Kajstura

Sr. Policy & Advocacy Analyst