

July 20, 2015

Karen Humes, Chief of the Population Division
U.S. Census Bureau

Via email to POP.2020.Residence.Rule@census.gov

Dear Ms. Humes,

I hope you are doing well. I am writing on behalf of the Prison Justice League (PJJL) to comment in response to the Census Bureau's federal register notice regarding Residence Rule and Residence Situations 80 FR 28950 (May 20, 2015). PJJL is a civil rights organization that works to improve conditions in Texas prisons through litigation, advocacy, and by empowering our members. As a civil and human rights organization that works with incarcerated people every day, I urge you to change the current system of counting prisoners where they are incarcerated instead of at their home address.

The prison system in Texas is one of the largest in the nation, incarcerating over 150,000 individuals across the state. Incarceration rates disproportionately impact communities of color, particularly African Americans. Although African Americans represent only 12% of the total state population, they represent over 30% of the prison population.

Furthermore, most incarcerated people reside in urban counties before being sent to prison but most prisons are in rural parts of the state. In general, rural areas of the state are white and conservative, while urban areas are more diverse and less conservative. Counting prisoners in prison for census purposes distorts the population data that is so critical to accurately apportion congressional districts.

Thank you for the opportunity to comment on the Residence Rule and Residence Situations as the Bureau strives to count everyone in the correct place. The Prison Justice League believes in a population count that accurately represents communities, and we urge you to count incarcerated people as residents of their home address.

Regards,

Erica Gammill, Director
Prison Justice League