



SCHOOL OF ARTS AND SCIENCES

Department of Urban and
Environmental Policy and Planning

July 10, 2015

Dear Karen Humes,

I am writing in response to your May 20, 2015 *Federal Register* notice regarding the Residence Rule and Residence Situations.

I am Professor Emeritus of Urban and Environmental Policy & Planning at Tufts University. I teach community development and social policy. Over the years I have worked with, and provided technical assistance, to numerous community-based organizations in Massachusetts but other places, as well. Much of this work is based on data reported by the U.S. Bureau of the Census, including the decennial census, American Community Surveys, and Public Use Microdata Samples. While I have highlighted the critical importance of census data for understanding population and demography and trends, and implications for public policy, one concern is always present. This is the fact that the current counting of incarcerated persons, especially in communities of color, limits the accuracy of official population counts. I urge 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. This will lead to enhancing the quality of population counts and surveys of the population. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "James Jennings".

James Jennings, PhD
Professor Emeritus