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MICHIGAN HOUSE OF REPRESENTATIVES

**JEFF IRWIN**  
STATE REPRESENTATIVE

July 14, 2015

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

Re: Residence Rule and Residence Situations, notice 80 FR 28950

Dear Ms. Humes,

On behalf of my constituents, I am writing to support changing the Census Bureau's residence rules to count incarcerated individuals at their homes, rather than designating prisons as their "usual residences."

As the prison population of the United States grows, it has become increasingly important to account for prisoners accurately in the Census. Prisons are often located in areas that otherwise have low population densities, so counting prisoners as residents of those areas is massively distorting. The current rule complicates the drawing of representative electoral districts, and it disproportionately misrepresents the residence of minority men.

Counting prisoners at their home addresses is important in ensuring they are represented in our democracy. Prisoners' legal residence remains their home address, and they usually return to that address when released. Those who can vote do so absentee using their home address; under Michigan law, they remain electors in their home districts. As a legislator, I can assure you that most of my colleagues do not treat prisoners brought into their districts as their constituents. Instead, prisoners are referred to the legislative office representing their home address.

Michigan has done its best to keep misleading prison Census numbers from distorting redistricting, but the solution is far from perfect. Problems have arisen regarding federal facilities, and Michigan's policies are different from those used in other states. In order to ensure that the same method is used to account for prisoners' residences across the United States, I respectfully urge the Census Bureau to adjust the residence rule to count prisoners in their home districts. This change will provide better data both for social science and for drawing the electoral districts upon which our representative democracy depends.

Sincerely,

  
Jeff Irwin  
Representative, 53<sup>rd</sup> District