

**CHICAGO OFFICE**  
4800 W. CHICAGO AVE.  
CHICAGO, IL 60651  
773.378.5902 OFFICE  
773.378.5903 FAX  
repford@lashawnford.com



**CAPITOL OFFICE**  
247-E STRATTON BUILDING  
SPRINGFIELD, IL 62706  
217.782.5962 OFFICE  
217.557.4502 FAX

**La Shawn K. Ford**  
**State Representative**  
**8<sup>th</sup> District**

POP.2020.Residence.Rule@census.gov

Dear Karen Humes,

I serve as the State Representative for Illinois' 8<sup>th</sup> Legislative District (including the West Side of Chicago and parts of the near West Suburbs), and I would like to submit this comment in response to the Census Bureau's federal register notice regarding the Residence Rule and Residence Situations, 80 FR 28950 (May 20, 2015). 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.

By designating a prison cell as a residence in the 2010 Census, the Census Bureau concentrated a population that is disproportionately male, urban, and African-American or Latino into a handful of Census blocks far from their actual homes. In my state, for example, 60% of incarcerated people have their home residences in Cook County (containing Chicago), yet the Bureau counted 99% of them as if they resided outside Cook County.

I have long supported counting incarcerated people at home, and have been working on a solution for Illinois since 2009, when I introduced the Prisoner Census Adjustment Act in the 97<sup>th</sup> General Assembly and again in the 98<sup>th</sup> General Assembly (HB 62) proposing that for purposes of creating election districts and redistricting, requires that State and local governmental bodies use census figures adjusted to reflect the pre-incarceration addresses of persons imprisoned in State or federal facilities in Illinois; this measure passed the House, but stalled in the Senate. As an elected representative, I am keenly aware that democracy, at its core, rests on equal representation. And equal representation, in turn, rests on an accurate count of the state's population.

When we use this data for redistricting, we shift political power to people who live near prisons. This needs to be corrected. The legislation I introduced would adjust redistricting data to count incarcerated people where they live. The bill applies to state, county, and municipal redistricting data, ensuring that prison populations are not used to skew political power in state or local government. And although the bills I introduced in Illinois specifically had no impact on funding formulas, I am confident that our state's aid distribution is sophisticated enough that a methodology change at the Bureau will not have any significant impact on our funding streams. (For example, Illinois' highway funds already separately fund Chicago, so that no change in the population count would shift highway funds from downstate to Chicago.)

Currently, four states (California, Delaware, Maryland, and New York) are implementing a state-wide approach to adjust the Census' population totals to count incarcerated people at home, and

over 200 counties and municipalities all individually adjust population data to avoid prison gerrymandering when drawing their local government districts, including at least 22 here in Illinois.

But this ad hoc approach is not efficient. It makes far more sense for the Bureau to provide accurate redistricting data in the first place, rather than leaving it up to each state or county to have to adjust the Census' data to count incarcerated people in their home district.

Thank you for this opportunity to comment on the Residence Rule and Residence Situations as the Bureau strives to count everyone in the right place in keeping with changes in society and population realities. Because democracy relies on a population count that accurately represents communities, I urge you to count incarcerated people as residents of their home address.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Ford', with a stylized flourish at the end.

La Shawn K. Ford  
State Representative--Eighth District