July 11, 2015

Dear Karen Humes:

Women Who Never Give-Up (“WWNG”) submits 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). WWNG is a 501(c)(3) nonprofit organization that confronts a wide range of criminal justice and prison-related issues. We 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 just 5,393 Census blocks that are located far from the actual homes of incarcerated people. When this data is used for redistricting, prisons inflate the political power of those people who live near them.

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. Because WWNG believes in a population count that accurately represents all communities, we urge you to count incarcerated people as residents of their home address.

Yours in humanity,

/s/ Gale Muhammad
President & Founder