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The 2020 Census Group Quarters operation out of the Detroit ACO was very deficient in many ways, among these were: delays in the start of the GQ operation; little if any preparatory work in advance of the operation; staff shortages throughout the operation; numerous changes in the leadership of the Detroit ACO which led to lack of training and supervision of those responsible for the GQ count in Detroit. Our initial review of the GQ Census 2020 data only confirms the assessment of a deficient operation. A deficient GQ operation significantly impacts the distribution of federal resources to Detroit so we are encouraged that the Census Bureau is considering a program to improve the base for calculating population estimates over the next decade. E support long-standing calls for the new program to go beyond the geographic misallocation and processing errors of data already collected in the census, to reflect a more expansive scope that allows for the inclusion of Group Quarters facilities and populations, as well as related housing unit populations (beyond GQ) that were missed in the enumeration and can be verified and captured via administrative data from higher education institutions, public housing agencies, skilled nursing facilities, and other reliable sources.

We support recommendations calling for the following:

1. Allow state, Tribal, and local governments or their designated representatives to review counts of Group Quarters facilities and population by type for census blocks.
3. Allow state, Tribal and local governments or their representatives to submit high-quality administrative records for the purpose of improving the count of students residing off campus on April 1, 2020. This would build upon the Census Bureau's previous effort during the data processing operation to elicit such records from colleges and universities as a means of completing the census enumeration.
4. Allow state, Tribal and local governments or their representatives to submit high-quality administrative records on service-based populations, including people staying in shelters for people experiencing homelessness or visiting mobile food vans and for the purpose of enumerating other housing unit populations beyond GQ.
5. Empower FSCPE/SDC/State representatives to assist and/or submit inquiries on behalf of eligible governments, with appropriate permission.
6. Work with key stakeholder groups to provide a resource with guidance for participation in the new program. Guidance for stakeholders regarding how to navigate the new program successfully would be an essential part of ensuring the success of the program.