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March 17, 2021

Mr. Dominic J. Mancini  
Administrator (Acting), Office of Information and  
Regulatory Affairs  
U.S. Office of Management and Budget  
1650 Pennsylvania Avenue NW  
Washington, DC 20503

Mr. James D. Fitzsimmons, Ph.D.  
Chief, Population Geography Staff  
Population Division  
U.S. Census Bureau  
4600 Silver Hill Road  
Suitland, MD 20746

Dear Mr. Mancini and Mr. Fitzsimmons,

We represent a collective of researchers, practitioners, nonprofit leaders, and advocates for rural economic and community development in the United States. Until the full range of consequences for federal funding is identified and analyzed, we strongly urge the Office of Management and Budget (OMB) to delay acting upon the recommendation of the Metropolitan and Micropolitan Statistical Area Standards Review Committee to increase the minimum population of cities that constitute the core of Metropolitan Statistical Areas (MSA) from 50,000 to 100,000.

**Indeed, we strongly recommend undertaking a process that considers changes to the definition holistically – looking at density, commuting patterns, size, and regional economies as an integrated whole** – through a robust, consultative, scientifically sound process that involves external researchers and practitioners to illuminate the full scope of potential consequences for rural communities and rural-urban regions.

The proposed change to the MSA standards would not just be “statistical” – it would have both financial and capacity consequences for rural places. Despite OMB’s insistence to the contrary, federal programs often use the OMB standards to inform definitions of “rural” and “urban” that influence eligibility requirements, allocation formulas, scoring criteria, and several other dimensions of program administration. A [recent Brookings analysis](#) found more than 400 programs available to rural communities for their community and economic development. The impact of the proposed change in MSA size on these programs is not fully understood, and in some cases could be significant. For example, this could change a community’s Title 1 status with CDBG or affect where the GSEs (Fannie Mae, Freddie Mac and the Federal Home Loan Banks) target lending efforts.

Current requirements to access federal program resources often disadvantage rural applicants through a bias towards large populations, compounding the difficulty for low-capacity communities to identify and access funding. The proposed MSA change would result in approximately 250 counties being reclassified from “metropolitan” to “micropolitan.” **Widening this pool of “nonmetro” communities would likely result in the current remote and distressed towns with very small populations competing with an even larger number of well-resourced former metropolitans for scarce federal funds, such as CDBG non-entitlement funding.** Further, many of these currently low-capacity communities are in rural counties with persistent poverty, the majority of which have majority minority populations, which means this change could worsen inequity.

This issue is also compounded by potential new changes to the Census Bureau’s criteria for defining urban areas that were [announced](#) last month. We recognize that the MSA standards and the Census Bureau definition are intended to be used solely as statistical tools, and that “non-metro” is not meant to define “rural.” However, in practice, these changes will have profound implications for rural communities.

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The proposed change in MSA delineation standards will also have significant implications for statistical analysis. Researchers, media sources, and policy advocates frequently rely on the MSA classification scheme to analyze demographic and economic trends in both rural and metropolitan areas. **Changing the threshold will represent a break in the series that will pose significant complications for longitudinal statistical analysis, making it difficult to understand the trajectory of rural realities over time and to measure the impact of implemented policies.** While any change to the delineation standards would have a similar effect, it is essential to ensure that resulting benefits outweigh these analytical costs.

**We urge that OMB, rather than making a consequential, piecemeal change to the MSA standard based solely on internal technical review and recommendation, undertake a comprehensive review that establishes a sound scientific basis through external analysis and review by researchers, demographers, and experts, involving rural practitioners and experts at each juncture.** This comprehensive review should be undertaken with some urgency to be included in the Decennial Delineation (June 2023) and five-year update (December 2028).

We would be eager partners to leverage our networks and expertise to assist OMB to fully understand the consequences of any proposed changes and thoroughly evaluate alternative options. In the interim, we respectfully request that OMB delay action to establish revised standards until an analysis of the full statistical and programmatic implications is completed.

Thank you,

[Name]

[Title]

[Organization]