



March 19, 2021

To: United States Office of Management and Budget (OMB)
Re: Federal Register Notice Document # 2021-00988

Dear Mr. Mancini and Mr. Fitzsimmons,

After careful consideration of the January 19, 2021, Federal Register Notice, I urge you to consider deferring action on consideration of the Metropolitan and Micropolitan Statistical Area Standards Review Committee's recommendation to increase the minimum urban area threshold for Metropolitan Statistical Areas from 50,000 to 100,000 people.

My concerns primarily lie with the proposed changes to the Urban Area delineation process outlined in the February 19, 2021, Federal Register Notice #2021-03412 *Urban Areas for the 2020 Census-Proposed Criteria*. Urban Areas serve as a key and defining input to core-based statistical areas and a number of the steps outlined by the Census Bureau proposal will have the effect of reducing Urban Area population and geographic coverage. These changes include:

- Reducing the maximum distance of "jumps" from 2.5 miles to 1.5 miles between adjacent urban cores which may prohibit the connection of previously joined population areas
- Omission of the densely populated census blocks along "hop" and "jump" corridors; perhaps the proposal's most significant change
- Excluding the step that added census blocks located within indentations formed in an interim Urban Area boundary

After a preliminary analysis of the Census Bureau's proposed criteria, which included use of geographic information system software and 2010 Census data to model the February proposal, I found that Urban Areas delineated under the Bureau's new process produced population levels that were between ten to twenty-five percent smaller than 2010-standard Urban Area delineations for the same area. We are continuing to develop this model to attempt to more-fully replicate the Bureau's procedure.

Smaller and more compact urban areas may serve the Census Bureau's goal of removing rural areas from the Urban Area fringe, but it would likely have the effect of increasing the number of Urban Areas falling under the 100,000 population threshold for Metropolitan Statistical Areas from 144 to a larger and yet unknown number. In effect, moving both the Urban Area and the Core-Based Statistical Area standards simultaneously compounds the effect of both changes, will result in a loss of comparability over time and will yield unpredictable results.

My comments lead to three recommendations regarding the Review Committee's proposal:

- Delay any modification of the Core-Based Statistical Areas delineation until such time that the 2020 Census Data and 2020 Urban Area boundaries are available to allow for more careful consideration of

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impact of the Review Committee's proposal and to develop a more accurate accounting of the current metropolitan areas that would revert to micropolitan status

- Acknowledge the widespread use of the OMB's Core-Based Statistical Areas for data products, funding and program eligibility by conducting an analysis of federal programs using the boundaries, as well as gathering information from these agencies about their intentions for Metropolitan Statistical Areas that are reclassified as Micropolitan Statistical Areas (e.g. would the Bureau of Labor Statistics continue providing *Current Employment Statistics for State and Metro Areas* products for micropolitan areas with an urban population of 50,000 to 99,999).
- Seek input from states citing Metropolitan Statistical Areas boundaries within their statutes when formulating

Changes to Core-Based Statistical Areas will have significant impacts, but the extent of those impacts should be better understood before accepting the Review Committee's recommendation. I encourage the Office of Management and Budget to conduct a more thorough and measured approach to any changes following the release of the 2020 Census data products.

Sincerely,

Tim Kuhn
Director, Tennessee State Data Center