

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515

March 16, 2021

Acting Director Rob Fairweather  
Office of Management and Budget  
725 17<sup>th</sup> Street NW  
Washington, D.C. 20503

Dear Acting Director Fairweather:

We write today to express our concern about the recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee (Committee) published in the Federal Register on January 19, 2021 (Federal Register Number 2021-00988). Specifically, we are opposed to the reclassification of a Metropolitan Statistical Area (MSA) as an area with a population of at least 100,000. This change will result in 144 areas in 45 states and Puerto Rico losing their MSA designation.

As you know, when the original MSA designation was made just prior to the 1950 Census, a population of 50,000 persons was set as the minimum population level necessary for an urban area to be considered an MSA. The Committee's recommendation to increase the minimum threshold to 100,000 persons is based on one factor only; that the minimum population required for an urban area to qualify as an MSA has not kept pace with population growth of the U.S. Because the U.S. population has more than doubled since 1950, the Committee therefore believes the minimum MSA population standard should double as well. That rationale is devoid of any cogent, scientific, or statistically relevant standard.

In the Committee's report to the Office of Management and Budget, dated August 1, 2019, the Committee makes no argument detailing the statistical need for changing the minimum MSA population threshold. Without clearly explaining the statistical drawbacks of adhering to the current population threshold and the statistical advantages of moving to the proposed new threshold, the change is based solely on the feelings of the Committee members and not on evidentiary proof or any scientific basis. Doubling the population threshold for an MSA merely because it sounds fair to the Committee is not an appropriate standard for changing U.S. Government policy.

Currently, roughly 86 percent of the U.S. population is designated as living within an MSA. Should the proposed change be adopted, that figure would fall to roughly 80 percent. Again, the Committee provides no discussion of whether this change makes MSA data significantly more statistically insightful or useful. Since the Committee ignores the argument altogether, we can

only assume that the Committee did not do its due diligence and made an arbitrary recommendation.

Additionally, the Committee evidently ignored how this population threshold change might affect broader statistical analysis. Since this threshold has been consistently in use for over 70 years, it is reasonable to assume that changing it now would create crucial data inconsistencies, especially for any longitudinal statistical studies in process from the federal government, state and local governments, academic institutions, or independent policy groups.

Finally, though we realize that the Committee does not take policy outcomes into consideration when offering its recommendations for the MSA threshold change, and we know that the U.S. Census Bureau and OMB routinely advise federal agencies that the MSA designation should not be used as a basis for implementing policy, it is well-known that federal agencies have long ignored that advice. As such, we would be remiss if we did not highlight how this proposed change could negatively impact our local communities. Many federal programs incorporate the MSA designation into the decision-making structure of how federal dollars are spent. From the Department of Housing and Urban Development's Community Development Block Grant (CDBG), to the Office of Personnel Management's Locality Pay Program for General Schedule Employees, to the Department of Health and Human Service's Medicare payment system for hospital inpatients, and the Ryan White HIV/AIDS program, to name a few, the definition of what constitutes an MSA is critically important to communities across America. Losing an MSA designation could mean tens or hundreds of millions of dollars in lost federal grant money to communities already struggling to rebuild economic engines that have been damaged by our current Covid-19 crisis.

The American taxpayer deserves to know that this proposed change was made using data-driven evidence and that all reasonably foreseeable effects from the change were carefully evaluated. While we appreciate the Committee's work, given the arguments made above, we believe the proposed change to be arbitrary and capricious and urge the Office of Management and Budget to reject the proposal.

Sincerely,



Bruce Westerman  
Member of Congress



Susan Wild  
Member of Congress



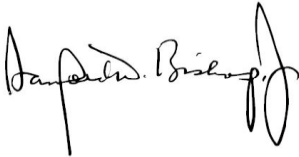
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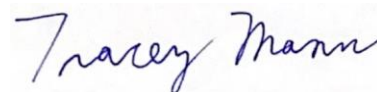
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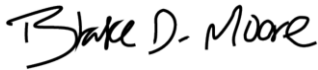
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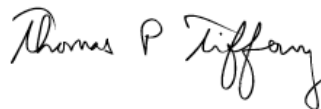
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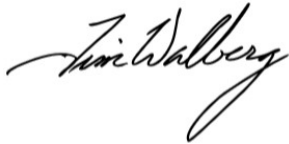
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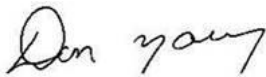
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