

United States Senate

WASHINGTON, DC 20510

March 17, 2021

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

Dear Acting Director Fairweather:

Re: OMB-2021-0001

We write to you today to express our concern for the recommended changes proposed by the Metropolitan and Micropolitan Statistical Area Standards Review Committee (Committee) published in the Federal Register on Jan. 29, 2021, regarding reclassification of a Metropolitan Statistical Area (MSA) as an area with a population nucleus of at least 100,000. In Kansas, this change would potentially remove three Kansas MSAs, or one third of the state's current number of MSAs, affecting five Kansas counties.

As noted by the Congressional Research Service, despite being intended purely for statistical purposes and not be used for funding formulas, in practice, Metropolitan, Micropolitan, and Core Based Statistical Area designations and metrics can have a significant role in the development of legislative policy and the distribution of federal funding for certain programs.¹ The Committee's report to the Office of Management and Budget (OMB) fails to provide evidence that this change to a significant population threshold standard, which has influenced federal policymaking dating back to 1950, is rooted in analyses of the benefits produced or had a compelling research-based process.

The federal government distributes billions of dollars annually through programs that utilize population statistics. Several of these programs are widely used in Kansas, including the U.S. Department of Housing and Urban Development's Community Development Block Grant and Department of Health and Human Service's Medicare payment system for hospital inpatients. Losing one third of our state's MSA designation could mean the loss of vital federal dollars to communities already struggling to rebuild economic engines damaged by the current Covid-19 crisis.

A former chief statistician of the OMB who helped develop the Committee's recommendations even stated:

¹ Metropolitan Area Designations by OMB: History, 2010 Standards, and Uses, Congressional Research Service, June 6, 2014

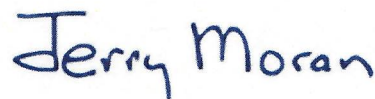
“There are winners and losers when you change these designations...A typical complaint comes from economic development when you are trying to attract investment. You want to say you are a part of a dynamic [Metropolitan Statistical Area]. There’s a perception associated with it. If your area gets dumped out of an MSA, then you feel disadvantaged.”²

The OMB should never be in the business of picking winners and losers while adopting bureaucratic standards affecting our communities. The Committee fails to provide the compelling research and evidence of benefits necessary for the OMB to justify that adopting this new threshold is not arbitrary, and we urge the OMB to maintain the nucleus core population at the current threshold.

Sincerely,



Roger Marshall, M.D.
United States Senator



Jerry Moran
United States Senator

² [Federal statisticians’ proposal would have 144 cities losing their status as metro areas, Washington Post, March 6, 2021.](#)