

United States Senate

WASHINGTON, DC 20510

March 19, 2021

The Honorable Rob Fairweather
Acting Director
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Dear Acting Director Fairweather:

We write today to respectfully request that you end the Office of Management and Budget's (OMB) consideration of a proposal that would adversely affect over 140 Metropolitan Statistical Areas (MSA) across the United States. On January 19, 2021, OMB initiated a public comment period on a proposal that would double the minimum population requirement for a MSA from 50,000 to 100,000. Doing so would remove MSA status from cities across 45 states.

While initially it may seem as though some areas could easily retain MSA status under the proposed new threshold of 100,000, it later becomes clear that the 100,000-population benchmark is not applied to the entirety of the MSA. Instead, this standard is placed only on the "core Census Bureau-delineated urban area," or the geographical boundary within the MSA which retains the highest population density. While a MSA may have a population of well over 100,000, if the core of the area does not meet this limited criteria, the area will be removed of its MSA status.

OMB's position is that the definition and criteria of a MSA may be changed independent of all other considerations. Indeed, the posting in the Federal Register states:

"OMB establishes and maintains these areas solely for statistical purposes. In reviewing and revising these areas, OMB does not take into account or attempt to anticipate any public or private sector nonstatistical uses that may be made of the delineations. These areas are not designed to serve as a general-purpose geographic framework applicable for nonstatistical activities or for use in program funding formulas."

Though the consideration of nonstatistical uses is not the priority of OMB, ignoring the unwritten effects that MSA's have on the decision-making process of our government would cause major disruptions with grant and entitlement programs, medical reimbursements, economic development, housing initiatives, and more. The MSA metric has become a critical tool so broadly used that changing it without considering its far-reaching impacts is short-sighted.

We strongly encourage OMB to preserve the current MSA definition to provide greater certainty for our cities and ensure their MSA status remains in place.

Sincerely,



John Boozman
United States Senator



Chris Van Hollen
United States Senator



Roy Blunt
United States Senator



Benjamin L. Cardin
United States Senator



Tom Cotton
United States Senator



Joe Manchin III
United States Senator



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John Barrasso, M.D.
United States Senator



Roger Marshall, M.D.
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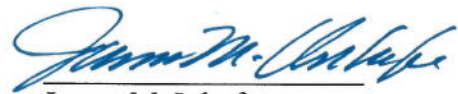


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