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*via email: [geo.urban@census.gov](mailto:geo.urban@census.gov)*

May 20, 2021

Mr. Vincent Osier  
Geographic Standards, Criteria, and Quality Branch  
Geography Division  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

*RE: Docket No. 2021-03412, Urban Areas for the 2020 Census – Proposed Criteria*

Mr. Osier:

On behalf of our state associations and the 90,000 school board members who govern our country's 14,000 local public school districts, the National School Boards Association (NSBA) is writing regarding the U.S. Census Bureau's proposed changes to how urban and rural areas are designated. The Bureau's proposed changes to the thresholds for the number of housing units and the population count for a community would impact how federal resources for students and public school districts are allocated. As our nation, school districts, and communities work to recover from the deleterious effects of COVID-19 on lives and families, education, healthcare, communities, and our economy, NSBA urges the Bureau to reconsider these proposed changes that could result in some communities receiving less resources and losing certain designations that are critical to local economies and services for children and other residents – from PreK-12 education, healthcare, housing, resources to address food insecurity, and more.

The Bureau's proposed changes to how it designates urban and rural areas will impact education policy at a time when resources to address learning loss are paramount, along with resources for school infrastructure, child nutrition, special education, career and technical education, and other programs that are directly related to safe, healthy, and innovative learning environments for our nation's 50 million public schoolchildren.

Similar to the objections that have been raised with the Office of Management and Budget (OMB) regarding its earlier Notice to alter how metropolitan statistical areas (MSAs) are determined, we urge you to reconsider these proposed changes that could pit larger areas against less populous and remote rural areas, in terms of federal, state, and local resource allocations. For example, these proposed changes – along with that of OMB – could impact Title I grants for disadvantaged students as well as other education programs, as various portions of funding allocations for programs to address educational equity and student achievement among all levels of government are based on Census data. Given Congress' authority to appropriate federal funds to communities pursuant to the most recent Census data, the Bureau's proposed changes to population thresholds and how communities are designated directly impact all efforts – federal, state, and local – to close achievement gaps, increase equity in education, and ensure the success of every student, whether they reside in a rural, urban, or suburban community. For example, if the Bureau's proposed changes are implemented, some school districts could receive less Title I funding unless a hold harmless provision were included in an appropriations formula. And, as thousands of schools work to reopen fully and provide extended learning opportunities

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to students and families to address learning loss from COVID-19, now is not the time to reconfigure designations for communities that could disenfranchise millions of children and students.

As the Brookings Institution wrote regarding the OMB proposal to change MSAs, “The proposed change is potentially so significant, and the statistical and financial consequences too insufficiently understood, for OMB to make an informed decision. The nation stands at the precipice of a major effort to recover from the economic and social impacts of the COVID-19 pandemic, while renewing investment in infrastructure, accelerating action on climate change, and dismantling the legacy of racism. Now is not the time for arbitrary action that challenges perceptions of fairness and community identity.”<sup>1</sup>

Coupled with the aforementioned OMB proposal, the Bureau’s proposed change to thresholds for urban and rural areas, is not fully understood. Further, the Bureau’s proposal to alter criteria for an urban area by changing a threshold from 2,500 persons to 10,000 persons is a significant difference in many communities. Additionally, the proposed change to the threshold for housing units could affect Impact Aid resources for federally connected students.

Our local school boards are accountable to their total communities for providing programs of educational excellence and demonstrating accountability through student achievement. Federal resources are an essential part of this responsibility to raise student achievement and advance equity in education for all students. As our school boards and their districts and communities make significant progress in equity and excellence in education, we urge the U.S. Census Bureau to reconsider any proposals that would hinder these efforts to support all of our students, regardless of their community designation.

As NSBA has supported efforts to ensure a complete 2020 Census count, we urge that the findings of this count be applied in a manner that does not deny any student the educational opportunity needed to succeed. We look forward to working with you as you continue analysis of the 2020 Census data.

Sincerely,



Anna Maria Chávez, Esq.  
Executive Director & CEO  
National School Boards Association

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<sup>1</sup>Anthony F. Pipa and Natalie Geismar, Brookings, “The new ‘rural’? The implications of OMB’s proposal to redefine nonmetro America,” <https://www.brookings.edu/research/the-new-rural-the-implications-of-ombs-proposal-to-redefine-nonmetro-america/#:~:text=A%20new%20proposal%20from%20OMB,million%20people%20into%20nonmetro%20status>, March 18, 2021.