



RURAL POLICY RESEARCH INSTITUTE

Department of Health Management and Policy
College of Public Health University of Iowa
145 N Riverside Drive
Iowa City, Iowa 52242-2007
Phone: 319-384-3857
<https://rupri.org/>

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Vincent Osier
Geographic Standards, Criteria, and Quality Branch
Geography Division
U.S. Census Bureau

Geo.urban@census.gov

Dear Mr. Osier:

Below is a comment letter from the Rural Policy Research Institute in response to the call for comments published in the *Federal Register* February 19, 2021; **docket number 2120212-0021**. Thank for you're the opportunity to provide our input.

The Rural Policy Research Institute (RUPRI) is a national policy research organization with a mission to: (1) undertake unbiased research and analysis on the challenges, needs, and opportunities facing rural America; (2) improve the understanding of the impacts of public policies and programs on rural people and places, using original research and policy analysis; and (3) facilitate dialogue and collaboration among the diverse community, policy, practice, and research interests focused on a sustainable rural America. RUPRI provides credible research and relevant policy insights using a collaborative approach that connects experts from across the United States to build teams with both a common commitment to research excellence and relevance to policy and practice. RUPRI is composed of multiple panels focusing on various national policies and issue areas of concern to rural populations including health, culture, the arts, and local and state actions. This document was completed by RUPRI's Population and Place Analytics Panel that works to strengthen the sound analytic capacity of RUPRI rural public policy analysis; and RUPRI's Health Panel that was established in 1993 to provide science-based, objective health policy analysis to federal policy makers. Both panels reviewed the recommendations from the U.S. Census Bureau forming RUPRI's comments.

Introduction

The Census definition of urban creates the building blocks for numerous population classifications and therefore any changes have the potential to create ripples across policy. The definition of urban continues to be leveraged by entities such as federal agencies and academics for classifying urban delineations as well as policy makers targeting public funding for place-based priorities. By extension, the concurrent definition of rural that is created through the definition of urban as recognized in this proposal has similar demand for entities prioritizing research and policy for rural areas.

Given the uncertainty of how the combination of proposed changes may impact the current population level and geographic scope of current urban areas, our comments will be organized along major concerns we ask the U.S. Census Bureau to consider as they finalize the criteria that go into measuring urban areas for the 2020 Census. Greater detail about the algorithm and

formulas corresponding to the proposals would have enabled attempts to model the potential changes to classifications.

Moving from a Population Density to Housing Density Approach for Defining Urban Areas

The Census Bureau has given multiple reasons for choosing to move from using population density to housing density as the building block of the initial urban area core. These include the variant nature of census block-level populations that will be an outcome of the application of differential privacy methodology, which Census acknowledged may create variants in published populations. Additionally, updating urban area geographic boundaries between census periods can be accomplished through housing density formulas due to regular updating of the Census Bureau's Master Address file from which housing is identified.

While Census has identified two strengths of this approach, we have the following concerns that we ask Census to consider.

1. *Variability in household size across race, ethnicity, and historically rural regions as well as variability in occupancy rate might impact the accuracy of using the 385-housing unit density as the building block of the initial urban area core.*

Census chose the 385-housing unit density per square mile as the new threshold for census blocks to be included in the initial urban area core. The choice of 385 was based on using the historical 1,000 persons per square mile density and dividing by the 2019 American Community Survey (ACS) 1-year data average of approximately 2.6 persons per household in the United States. We are concerned with the choice and potential universal application of 2.6 persons per household average. Census did not provide a justification for using the 2019 ACS that includes a smaller subset of the national population in its estimate (only places with populations 65,000 or greater are included in the one-year ACS) as opposed to other data products that Census generates that include both large and small populations (such as the five-year ACS). That is, the role smaller settlement patterns below 65,000 in population have in contributing to the choice of the 385 housing unit density threshold is ignored. There is a similar concern about occupancy rates and the implications for under- and over-counting urban population. Since housing density will be counted towards the housing density threshold without regards to occupancy rate, there may be a measurable percentage of low housing occupancy census blocks (and their residents) counted in the urban population while more population dense but less housing unit dense census blocks get counted as rural due to high occupancy rates. This may be especially acute in regions with large variations between a high seasonal population and a much lower out-of-season population (e.g., tourist destinations). We are concerned that counting some of these geographic areas as urban when these regions meet some of these thresholds only a small proportion of the year may create more outliers in statistical research and create problems for policymakers targeting some of these regions which may be rural most of the year.

2. *There are implications for a dense built environment definition of urban given the diversity of US settlement patterns.*

Several changes highlight a general trend Census is proposing with the urban definition. This includes movement to using housing density (regardless of occupancy), increased emphasis on impervious surfaces, and reduction in jump distances to connect noncontiguous densely settled territory points. This strategy centers on the unit of analysis for urban as a densely built environment as opposed to people. We are concerned this general trend seems to be further supported by the decision of Census to not create a

similar medium housing density threshold analogous to the current 500 persons per square mile for adjacent census tracts in the current definition.

Moving the Urban Area Threshold to 10,000 Population Creates Potential Loss of Information and Clarity for Rural Geographies

3. *There is a potential loss of information impacting how federal statistical agencies and other statistical organizations delineate rural regions with smaller settlement patterns.*

One of the arguments made for the elimination of the urbanized area and urban cluster definitions was that federal agencies apply a range of thresholds to define various urban-rural classifications. This line of reasoning does not seem problematic for delineating urban areas with populations of 10,000 or higher. However, there will be a loss of information along the rural continuum for those settlement patterns between 2,500 and 9,999 in population. For example, the USDA Economic Research Service Rural Urban Continuum Codes classifies counties in the United States along nine different categories. Category 6 – “Nonmetro – Urban population of 2,500 to 19,999 adjacent to a metro area” and Category 7 – “Nonmetro – Urban population of 2,500 to 19,999” rely on having the Census provide an urban definition starting at 2,500. (<https://www.ers.usda.gov/data-products/rural-urban-continuum-codes/documentation/>) A similar consequence would occur for some of the categories in the USDA Economic Research Service Urban Influence Codes.

We are not arguing for or against if 2,500 or 10,000 is the proper threshold for giving a settlement pattern an urban classification. Rather, we are concerned that federal statistical agencies such as the Economic Research Service will be forced into a structural change to some of these historical delineations that leverage the 2,500 population threshold in their codes for small settlement patterns. These codes are used by many rural scholars in academic and policy research. We would ask Census to consider an approach (if 10,000 becomes the urban area population threshold) that publishes the initial urban area core for cores that do not reach the 10,000 person threshold so that federal agencies and other researchers focused on rural issues would have a similar ability to evaluate the rural continuum using the proposed approach as those focusing on an urban continuum.

One may argue that these agencies could simply use Census published municipality counts for municipalities between 2,500 and 10,000 as an alternative. We argue this would create bias towards a more accurate accounting of large settlements at the expense of accuracy in measuring small settlement patterns. For example, the creation of the urban cluster and urbanized area definitions starting with the 2000 Census was argued to eliminate the bias in the urban definition created by municipalities incorporating mostly low-density settlements to increase urban population counts as well as recognize densely settled areas adjacent to incorporated municipalities that resulted in an undercount of urban. Without making public initial urban area core settlements across the entire United States, federal agencies classifying small rural areas will have to incorporate these less accurate strategies that Census dropped 20 years ago. Outside of protecting confidentiality, we believe these small settlement patterns should have similar data availability to our largest urban centers. That is, counties should have their small settlement patterns measured the same way as counties with large settlement patterns, so all settlement patterns are measured consistently regardless of size and whether we classify an individual settlement as a distinct urban or rural settlement.

4. *There are implications for communities that cannot decipher how their urban population is calculated.*

We are further concerned that a set of rules that move away from population and towards a built environment may make it harder for people in communities to understand how their

urban population is calculated. We think this is extremely important when the public is asked to provide comments to proposed rules changes that use the urban definition. For example, the Office of Management and Budget (OMB) uses the urban population from Census to determine the building blocks of Metropolitan or Micropolitan areas. A review of many of the OMB comments from the general public on their most recent proposed changes in January 2021 suggest some commenters could not understand why their urban population was defined as being smaller than the proposed 100,000 urban area threshold. It is unlikely that a movement from a population to a built environment approach for defining urban will make it easier for the general public to interpret.

5. *There are implications for not providing simulated changes to existing population under the proposed urban definition.*

We are disappointed that Census did not highlight how these new criteria might change the number of urban areas and their population bases. We ask Census consider highlighting how urban definition changes would impact urban population using 2010 Census data. Census has precedent for such an approach by showing how populations would change when it applied a differential privacy algorithm on geographies from the 2010 Census. We suggest Census consider a similar strategy in full or in part to the approach they applied to differential privacy for the urban definition.

Conclusion

We appreciate the efforts that Census has made to review the urban definition and adjust its definition that has the potential to benefit many constituencies that use it for statistical and non-statistical purposes. We further appreciate the intentionality that Census has taken to recognize that their urban definition creates a formal definition for rural in the United States as well. Given this realization, we believe that Census should be concerned about the loss of settlement pattern information for rural areas that these proposed changes may create. Further, Census should provide additional evidence concerning how these proposed changes might impact how urban and rural populations are counted by applying the new proposed criteria on historical data. Such presentations may help reduce confusion and uncertainty on how these changes will impact all the constituencies that use urban and rural data from the U.S. Census Bureau.

Sincerely,



Keith J. Mueller, Ph.D.
Director, Rural Policy Research Institute
Keith-mueller@uiowa.edu