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### Rural Health Panel

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Office of Rural Health Policy

Health Resources and Services Administration

5600 Fishers Lane, Parklawn Bldg, 5A-05

Rockville, MD 20857

[shirsch@hrsa.gov](mailto:shirsch@hrsa.gov)

Dear Mr. Hirsch:

The RUPRI Health Panel is submitting comment on **the proposed Methodology for Designation of Frontier and Remote Areas**. Specifically, we are commenting in response to three of the seven requests stated in *The Federal Register* notice of November 5, 2012 (p 66475).

#### Request

1. The use of a population threshold of 50,000 as the central place from which to measure in defining FAR areas.

#### Comment

The Panel concurs with this as the population threshold. It is consistent with current practices in both research and policy development. We recognize that for specific purposes different thresholds may be appropriate. The proposed methodology addressed that need by providing four levels for designating FARs, and providing data for additional adaptations by making the data publicly available.

#### Request

3. Whether the 50 percent population threshold for assigning frontier status to a ZIP code/census tract is the appropriate level for the four standard provided levels.

#### Comment

The Panel concurs with the decision to use the 50% threshold. We recognize there are scenarios in which a ZIP code may be designated as urban based on a commuting population being concentrated in a small percentage of the land area of a very large ZIP code (most like to occur in Western states). Those anomalies can be resolved by adjusting the percentage of the population downward, which is possible given the public availability of the data. The flexibility afforded by making the population data available is consistent with the Panel's long-standing position that definitions of rural need vary, depending on policy objectives ("Choosing Rural Definitions: Implications for Public Policy." March, 2007,

<http://www.rupri.org/Forms/RuralDefinitionsBrief.pdf>)

### Request

7. Need for Census tract and county version of the FAR.

### Comment

The Panel recognizes value in having data available in geographic metrics other than ZIP code, particularly for integration across data sources. However, given current ability to measure areas using RUCA codes or Urban Influence Codes, making the data available for designating FARs by those areas is not a priority for completing the process of FAR designation. The value of the new classification system is its ability to be more refined in identifying FARs, which is best accomplished with analysis based on ZIP codes. The contribution of the new designation is enabling more precise targeting of places which would benefit from specific policy interventions; that purpose should be fulfilled before using resources for any other purpose such as providing the data using other measures of geography.

Sincerely,

The Rural Policy Research Institute Health Panel

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