

May 18, 2021

Ms. Shalanda Young  
Acting Director  
Office of Management & Budget  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Dear Ms. Young:

Thank you for the opportunity to offer input to the Office of Management and Budget's (OMB) Metropolitan and Micropolitan Statistical Area Standards Review Committee. The Baldwin County Commission opposes adopting the review committee's recommendation to increase the metropolitan statistical area (MSA) from a minimum population of 50,000 to 100,000 people.

Increasing the minimum MSA population requirement would undermine the consistency in the collection of valuable data and interrupt federal aid to our communities. Maintaining consistency in the MSA program is helpful for local governments who depend on long-term trend data to better understand the economies in our areas. Having consistent, long-term data sets can be invaluable to businesses by giving them the tools to easily compare changes in labor markets and an area's economic conditions. Long-term data sets are also helpful for local governments as they implement policies to raise employment rates and administer aid during the economic recovery.

Many federal programs incorporate the MSA designation into the decision-making structure of how federal dollars are spent. From the Department of Housing and Urban Development's Community Development Block Grant (CDBG), to the Office of Personnel Management's Locality Pay Program for General Schedule Employees, to the Department of Health and Human Service's Medicare payment system for hospital inpatients, to name a few, the definition of what constitutes an MSA is critically important to communities across America.

In addition to the known federal programs that would be impacted, this proposed change could potentially have wide-ranging impacts that are hard to ascertain at the present time. The reality is that there are many different definitions of "rural" and "urban," and different federal

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programs rely upon different definitions. Because of the complexity of this landscape, it is difficult to understand the full scope of all possible implications of this proposed change and the affects it could have on other federal programs.

In closing, we strongly encourage the OMB to reject the recommendation to increase the MSA population from 50,000 to 100,000.

Sincerely,

JOE DAVIS, III, Chairman  
Baldwin County Commission

cc: Senator Arthur Orr, District 3 Alabama State Senate  
Wayne Dyess  
Sherry-Lea Botop  
Joey Nunnally  
Sarah Hart Sislak  
Lisa Sangster