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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

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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 its proposed changes that could result in the loss of 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

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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-