



Helping Build Homes and Communities Across Rural America

October 21, 2021

Dr. Ron Jarmin  
Acting Director  
The United States Census Bureau  
4600 Silver Hill Road  
Suitland, MD 20746

Re: 2020 Census Data Products

Dear Acting Director Jarmin:

The Housing Assistance Council (HAC) welcomes this opportunity to submit comments to the U.S. Census Bureau's New 2020 Census Data Product Planning Crosswalk.

HAC is a national nonprofit organization that helps build homes and communities across rural America. Since 1971, HAC has provided below-market financing for affordable housing and community development, technical assistance and training, research and information, and policy formulation to enable solutions for rural communities across the country. With 50 years of researching and supporting communities and populations across rural America, HAC is uniquely positioned to comment on the U.S. Census Bureau's data products.

HAC appreciates the Bureau's efforts to provide essential and timely information about social, economic, and housing conditions across the U.S. [The Housing Assistance Council urges the U.S. Census Bureau to provide sub-county geographies in all elements of the new Data Product Planning Crosswalk, as well as all public-use data products it produces.](#)

Political and economic geography is an important consideration when determining the population and residential patterns of an area. The county is a commonly used unit of geography. In many rural areas, the county is often identified within political, social, and economic contexts. However, county-based designations are not the optimum criteria on which to assess or research social, economic and housing conditions. Large counties, particularly in the Western United States, may dilute or mask rural population given their geographic size and influence.

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San Bernardino County in California presents a prime example of this incongruity. With more than 20,000 square miles, San Bernardino is one of the largest counties in the continental United States and is larger in land area than several states. San Bernardino is classified as a Metropolitan Area by OMB, and under such criteria, the entire county is considered “urban” by proxy under this classification. The county does contain a large population center in and around the cities of San Bernardino and Riverside, but 98 percent of the county’s land mass would arguably be considered rural by almost any measure. In fact, the Mojave Desert, located in San Bernardino County, is considered “Metropolitan” under this scheme. There are numerous instances across the nation like San Bernardino where large counties would not provide an accurate picture of many individual communities that lie within its boundaries. As a result, analysis, policymaking and planning based on such information are likely to be flawed. St. Louis County, MN, Coconino County, AZ, and Kern County, CA are just a few counties similar to San Bernardino in this discrepancy between geography and population that would obscure the overall demographic diversity of these places. Sub-county units of geography such as census tracts or block groups are often more precise and nuanced indicators of characteristics and trends than counties.

Below are a few selected examples of statutory, regulatory, or programmatic efforts that rely on sub-county and trend data from the U.S. Census Bureau:

- [Consumer Financial Protection Bureau’s Home Mortgage Disclosure Act Data \(HMDA\)](#). [HMDA](#) requires most financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities; they give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory. The public data are presented at the census tract level. HMDA was originally enacted by Congress in 1975 and is implemented by Regulation C.
- [The Federal Housing Finance Agency’s \(FHFA’s\) Duty to Serve Regulation](#). [The Duty to Serve \(DTS\) requires](#) Fannie Mae and Freddie Mac (Enterprises) to facilitate a secondary market for mortgages on housing for very low-, low-, and moderate-income families in three underserved markets: Manufactured Housing, Affordable Housing Preservation, and Rural Housing. FHFA monitors and regulates Duty to Serve largely through market analysis at the census tract level. Duty to Serve is established by The Housing and Economic Recovery Act of 2008 (HERA).
- [USDA Economic Research Service \(ERS\) Rural-Urban Commuting Area Codes](#). [The rural-urban commuting area \(RUCA\) codes](#) classify U.S. census tracts using measures of population density, urbanization, and daily commuting. Whole numbers (1-10) delineate metropolitan, micropolitan, small town, and rural commuting areas based on the size and direction of the primary (largest) commuting flows. These 10 codes are further

subdivided based on secondary commuting flows, providing flexibility in combining levels to meet varying definitional needs and preferences. Descriptions of the codes are found within the data files, and also in the [Documentation](#).

- [Housing Assistance Council's \(HAC's\) Rural & Small Town Typology](#). Given the changes and shortcomings to traditional definitions used to identify rural areas, HAC developed a [sub-county designation](#) of rural and small-town areas which incorporates measures of housing density and commuting at the census tract level to establish a more precise measure of rural character. This alternative residence definition includes six classifications: 1) rural, 2) small-town, 3) exurban, 4) outer suburban, 5) inner suburban, and 6) urban within larger geographies such as counties or states. These designations are often collapsed into 3 general classifications of: 1) small town and rural tracts, 2) suburban and exurban tracts, and 3) urban tracts.

These are just a few examples of the importance of sub-county geography in a wide range of governmental, research, and policy uses. There are likely hundreds, if not thousands, of similar statutory, regulatory, or research use cases that rely on detailed sub-county geography trend data. In a real world example of the importance of precise geographic data, the [Guardian](#) published [an expose highlighting a conflict over the construction of the Atlantic Coast pipeline](#) between the residents of a small historically Black community in Virginia and Dominion Energy. The reporting revealed the importance of small land area level geographic data. A part of this disagreement centered on whether pipeline construction would primarily impact Black residents. Data disagreements were likely related to differences in the defining geographies. As the Guardian's reporting reveals, if the underlying census geography covers a large area, it will not provide accurate information on any one specific, small area that lies within.

The Housing Assistance Council is pleased to have this opportunity to provide comments to the U.S. Census Bureau on its new 2020 Census Data Product Planning Crosswalk. HAC looks forward to working with the Census Bureau to continually improve the provision of data for all communities – urban, suburban, and rural.

Please do not hesitate to contact me if you need additional information or clarification of our comments.

Sincerely,



Lance George  
Director of Research & Information