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COMMITTEES

APPROPRIATIONS

ARMED SERVICES

ENERGY AND NATURAL RESOURCES

VETERANS' AFFAIRS

March 12, 2024

Peggy Carr, Ph.D.  
Commissioner  
National Center for Education Statistics  
Institute of Education Sciences  
Potomac Center Plaza  
550 12<sup>th</sup> Street, SW  
Washington, D.C. 20202, USA

Dear Commissioner Carr,

West Virginia is the only state that lies completely within the Appalachian Mountain region. It has a higher mean elevation than any state in the east. According to the Census Bureau, West Virginia is the third most rural state in the nation with 51.8% of the state's population living in rural areas. However much of West Virginia, and Appalachia as a whole, continues to be miscategorized as "urban", denying opportunities to many of our most vulnerable regions.

The National Center for Education Statistics (NCES) is tasked with collecting, compiling, procession and analyzing information for statistical purposes. You are the primary agency for which the Department of Education and the public rely on for statistical information regarding education activities. Part of this role includes collecting information on all public schools' districts in the country and then classifying them into locales. Your current classification system includes four categories with each having three locales. The four categories you classify are rural, town, suburban, and city. Under your rural category you define remote rural as "more than 25 miles from an urbanized area, a distant rural area as "more than 5 miles or less than or equal to 25 miles from an urbanized area, and fringe rural as "less than or equal to 5 miles from an urbanized area"<sup>1</sup>. What this does not consider is the topography where a school district is located, impacting travel of students to and from school.

The United States Department of Agriculture Economic Research Service on August 1, 2023 released their *Characterizing Rugged Terrain in the United States* report<sup>2</sup>. The report shares two new measurements for representing relative topography: the Area Ruggedness Scale (ARS) and the Road Ruggedness Scale (RRS). The report found that 11.7% of the United State population lives in a rugged area, with 1.4% living in a highly rugged area. For comparison, West Virginia has the largest shared of resident living in a rugged area, with 80.7% of the population living in a rugged area and 15% in a highly rugged area. While ruggedness alone cannot dictate rurality, we feel that it is an important consideration when determining what is rural and what is not.

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<sup>1</sup> Locale Classifications, Education Demographic and Geographic Estimates.

<https://nces.ed.gov/programs/edge/Geographic/LocaleBoundaries>

<sup>2</sup> Dobis, E.A., Cromartie, J., Williams, R., & Reed, K. (2023). *Characterizing rugged terrain in the United States*. U.S. Department of Agriculture, Economic Research Service. ERR-322.

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Your current rural measurement relies on mileage in sparsely settled and remote areas, however it does not account for sparsely populated mountain regions, and commuting times for difficult terrain are not adequately reflected. The RRS helps bring further clarity to where people live in rugged terrain, which can make it difficult to travel, creating areas that are remote and difficult to reach, but perhaps not a long mileage distance.

When comparing your current locale codes to the RRS, there are 109 counties in the United States that have over 2/3rds of their census tracts classified as “rugged”, and have no school districts classified as “remote rural” or “distant rural”. This includes 27 counties in West Virginia, the most of any state. For example, counties such as Marshall County in West Virginia, have a population of just over 33,000 people, with its largest town, Moundsville, being home to just 7,900. However, Marshall County is considered with locale code of 23, classifying it as “suburban”. This is despite the fact that the nearest principal city is located in a neighboring county, and is only home to 26,000 individuals. The mountainous terrain of Appalachia leads residents to live along highways and rivers, resulting in a higher density per square mile, so the urbanized areas stretch far outside their practical regions. Marshall County is 89% rugged, which better reflects the reality of the county.

The RRS is the first nationwide detailed ruggedness measure and we feel it will be an important tool in targeting resources to areas like Appalachia that have so far been left behind. As NCES is dedicated to providing the most accurate information regarding education activities, we feel that the RRS is the newest and best tool for capturing the realities of attending school and receiving an education in mountainous and difficult terrain areas.

We look forward to hearing your review of the report and how you intend to better capture rugged areas in your data and definitions.

Sincerely,



Joe Manchin III  
United States Senator

JMIII/jcl