

~~December 19, 2017~~~~December 19, 2017~~~~December 18, 2017~~

Secretary Benjamin Barnes  
Office of Policy and Management  
450 Capitol Avenue  
Hartford, CT 06106-1379

Dear Secretary Barnes:

On behalf of Connecticut's Councils of Governments (COGs), the undersigned would like to ask that the State of Connecticut request the U.S. Census Bureau to initiate a criteria change process to add Connecticut's regions to the list of political subdivisions recognized as county equivalents. This process is needed to bring the actions of federal agencies into conformity with Connecticut law, which states that "A regional council of governments... may... accept or participate in any grant, donation or program made available to counties by any other governmental or private entity." (CGS 831-bb)

It is widely known that Connecticut differs from most states in the absence of county government. What is not widely known, however, is that the federal government is willing to recognize alternate forms of regional governance in states that lack formal county government. The Census Bureau terms these entities "county equivalents." County equivalents take a variety of institutional forms; what unites them is that they are treated as counties by the Census Bureau and all federal agencies that use Census geographies. What this means in practice is that a) the Census aggregates data for these regions, and, crucially, b) the regions are treated as eligible applicants and recipients for the 80% of federal grant programs that are open to counties. Perhaps because of these advantages, well over 100 county equivalents exist nationwide.

Nationwide, federal grants to counties and county equivalents total over \$20 billion annually. While local governments can apply to many of these programs, Connecticut municipalities may not be well-positioned to compete against metropolitan and county governments in other states. While Connecticut's regions can and do assist their members in grant preparation, we are unable to submit some grants to the federal government *as a region*. This may put the state and its municipalities at a competitive disadvantage, and poses an obstacle to the implementation of regional services. (Without direct access to federal grantors, municipalities cannot regionally consolidate federal grants for existing services, nor apply as a COG for grants to support new regional services.)

These concerns are not theoretical. Connecticut pays more federal taxes per capita than all but two states yet receives \$70 less per capita back from the federal government than the average state. The lack of federal transfers to county governments or equivalents accounts for two-thirds (\$45) of this difference. Federal recognition of Connecticut's regions as county equivalents would create additional vehicles for grants and over time could bring significant new federal funds into the state.

Federal agencies defer to the Census Bureau to identify political subdivisions for grant eligibility. These subdivisions include counties and county equivalents, which the Census identifies through use of internally-

developed criteria. At present, regional governments in six states fit these criteria and are officially considered county equivalents. However, Bureau staff have stated they are willing to initiate a process to revise the criteria to include regional governments in other states without county government on request. In the case of Connecticut, whose General Assembly has already ~~has~~ enabled COGs to act as counties for federal purposes, no state legislative action is required. According to Census staff, the only action necessary from the state would be a formal request by the state’s executive to initiate the criteria change process. This is why we are writing you—to ask that you request that the Census Bureau begin a criteria change that would result in Connecticut’s COGs being treated as counties at the federal level, bringing federal policy in line with state law.

In summation, county equivalency offers a real opportunity to build capacity at the regional level, support cost-saving innovative approaches, and overall to bring in additional revenue to the state. For these reasons, we ask that you request that the Census Bureau revise the criteria they use to identify county equivalents to include Connecticut’s Councils of Governments.

We look forward to working with you to strengthen Connecticut and thank you for your time.

Sincerely,

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James Butler (SCCOG)  
Chair, CTCOG

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Sam Gold (LCRVCOG)  
Vice-Chair, CTCOG

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Carl Amento (SCRCOG)  
Secretary/Treasurer, CTCOG

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Rick Dunne (NVCOG)

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Lyle Wray (CRCCOG)

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John Filchak (NECCOG)

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Rick Lynn (NHCOG)

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Francis Pickering (WCCOG)

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Matt Fulda (MetroCOG)

cc: Undersecretary Michael Sullivan, OPM  
ADD Dan Morley, CP&I Policy Division, OPM  
Legislative Leadership