

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT

Proposal Title:

Survey of Local Regulatory Practices and Manufactured Homes

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PART A. JUSTIFICATION

A1 Circumstances that Make the Collection of Information Necessary

One of the Department of Housing and Urban Development's (HUD's) main strategic goals is to promote decent affordable housing. HUD's Partnership for Advancing Technology in Housing (PATH) supports this and other HUD strategic goals through its programmatic goals of (1) study, reduce, and eliminate institutional barriers to technological innovation; (2) invest in collaborative technological research as well as improve the investment rate in housing research and development; and (3) improve the level of information and education regarding housing technology. In pursuit of these goals, PATH activities are guided by objectives driven by measurable inputs and resources that lead to specific desired outcomes. The collection of this information is authorized by Title 12 U.S.C., 1701z-1.

PATH activities to promote decent and affordable housing include gathering information on how zoning codes and local regulations affect the cost of housing. Other activities include examining the use of alternative or less traditional housing structures such as HUD-code manufactured homes (formerly known as mobile homes) that have lower development and construction costs. The research outlined in this package combines elements of both of these activities with the objective to determine the type, incidence, and scope of regulatory barriers that Community Development Block Grant (CDBG)-eligible local governments (metropolitan municipalities and counties) use to prohibit or restrict the use of manufactured homes. This information will help HUD make suggestions and recommendations on steps that states and localities could take to eliminate or mitigate the identified barriers thereby opening up more opportunities for manufactured homes as a cost-effective affordable housing option.

In order to better measure the degree to which local and state regulations affect the placement of manufactured homes in CDBG-eligible communities, the contractor needs to collect information directly from city or county officials with knowledge of codes and regulations relating to manufactured homes in their jurisdictions. The contractor designed a questionnaire that will be mailed to officials that will supplement information the contractor will collect through direct examination of regulatory code documents. The questionnaire will give perspective to the quantitative data and provide information on the implementation and interpretation of local manufactured housing regulations. This qualitative component is critical to the proper interpretation of the overall data collection process.

A2 How and By Whom the Data Will Be Used

A2.1 Project Overview

The contractor will mail a questionnaire to city and county planning officials in selected urban and suburban jurisdictions (CDBG-eligible communities) in the U.S. to collect information on the character and scope of local regulatory barriers that impact the incidence and placement of manufactured homes. The information collected will help HUD determine to what extent metropolitan communities use codes as a means of discouraging or excluding manufactured homes and to what degree local officials use discretion in administering rules for placement and/or design standards of manufactured homes. Ultimately, this information will be used to advise states and communities on steps that can be taken to reduce barriers to manufactured homes, an under utilized potential source of affordable housing in metropolitan areas.

A2.2 Purpose of the Data Collection

Specifically, the purpose of the data collection is to (1) gauge an understanding of to what extent and in what locations have metropolitan jurisdictions allowed manufactured homes in their communities; (2) ascertain how regulations and specific barriers affect the placement of manufactured homes; (3) identify the extent to which various regulations allow interpretation by the planning commission or the local board approving conditional use permits; and (4) determine what restrictions and/or design standards communities place on manufactured homes. The ultimate purpose of the data collection is to supply the information HUD needs to provide suggestions and recommendations as to how to remove specific barriers to manufactured housing and to provide guidance for communities to encourage manufactured housing as a more broad-based acceptable housing option. With greater knowledge of local codes impacting manufactured homes in metropolitan communities along with a better understanding of how local officials interpret and administer those codes, HUD can look for ways to “level the playing field” for manufactured homes and create more opportunities for this cost-effective alternative to conventional site-built housing to meet a community’s housing affordability needs.

A2.3 Who Will Use the Information

HUD's Office of Policy Development and Research (PD&R) will use this information to help determine to what extent local regulations limit manufactured homes as an affordable housing option and to help formulate guidelines which will potentially reduce impediments to manufactured homes in metropolitan communities. Information collected as a result of the questionnaire will be used to assess HUD's performance with respect to enhancing public awareness about the role local code restrictions play in excluding or limiting manufactured homes which, in many respects, are now indistinguishable from site-built housing. States and metropolitan localities will be provided with the results of this research which could bring about positive changes in legislation and/or in practice if they currently use their authority to regulate land use and zoning to exclude or discriminate against the placement of manufactured homes in their community.

A2.4 Instrument--Item-By-Item Justification

The survey instrument is a short questionnaire designed to be received by mail and self administered by the recipient. The recipients or respondents will be part of a universe that consists of a random sample of 250 CDBG-eligible communities across the nation who are in the mid categories of the regulatory severity score (communities identified by experts as “exception communities” that have local regulations which deviate from state law and can be considered in a grey-zone where there is greater latitude for interpretation of regulations). Respondents likely will be local planning directors or other officials with knowledge of local regulations as they relate to manufactured housing. In most cases the questionnaire will be mailed to the local planning director. If the locality does not have a person in that position, the questionnaire will be mailed to another local official identified as having knowledge of code and zoning regulations. Response to the questionnaire is one time only.

The questionnaire consists of 8 primary questions and potentially 27 sub-questions about a locality’s practices regarding manufactured homes. The questions are preceded by a description of who should answer the questionnaire along with a statement that answering is voluntary and information provided will be treated confidentially. In order to get the respondent with the best knowledge of local code practices, the respondent is given the option to pass the questionnaire to a person he or she believes is better suited to answer questions on coding regulations related to manufactured housing. The questions also are preceded by text clearly defining terminology used in the questionnaire. Consistent terms are used throughout the questionnaire. For example, the respondent is told that manufactured homes will be referred to as HUD code homes and that term is used throughout the questionnaire.

Q 1. Question 1 gathers information that determines whether a respondent needs to answer all the questions thereby saving time for both the respondent and the researchers. Question 1 establishes whether the respondent’s jurisdiction has approved placement of any new HUD code homes in the past five years. If the answer is *no* or *probably not* then the respondent is asked if their jurisdiction ever allows HUD code homes. If the answer is *no*, then the respondent is asked to skip to the last question which has them rate potential barriers to HUD code homes. If the answer is *yes*, then the respondent is asked to choose the best of three descriptions of their jurisdiction’s regulations and asked to skip questions 2, 3, 4 and 5 which are only applicable for respondents who indicated their jurisdiction had approved placement of HUD code homes in the past five years.

Questions 2 through 4 are only asked of the respondents who said *yes* or *probably* that their jurisdiction had approved placement of HUD code homes in the past 5 years.

Q 2. Question 2 determines incidence by asking the respondent how many HUD code homes have been placed or located in their jurisdiction in the past five years. The respondent can choose from a number of categories (ranges of 10 up to 50, then 51-99, and finally 100+).

Q3. Question 3 determines special circumstances and discretionary practices by asking the respondent about special zoning, conditional use permits, and by right use in single-family zones that apply to placement of manufactured homes. If the respondent answers yes to the question that the jurisdiction allows HUD code homes as a by right use in one or more single-family zones if design standards are met, the respondent is asked if there is discretion in the administration of the design standards and asked if the design standards are difficult to meet.

Q4. Question 4 determines support level by asking if the jurisdiction has approved and new parks, communities, or subdivisions for HUD code homes and if so, how many.

Q5. Question 5 is about where HUD code homes have been placed in the past five years. The respondent is asked to choose from a number of categories that indicate the proportion of HUD code homes placed in the following locations: parks, communities, or subdivisions; in-fill in older single-family neighborhoods; and new single-family subdivisions.

Questions 6 and 7 are asked of respondents that responded they had at some point approved the placement of HUD code homes.

Q6. Question 6 determines discretion by asking the respondent if their jurisdiction requires a special or conditional use permit or other permit if HUD code homes are placed or located in single-family zones (other than designated mobile home parks, communities, and subdivisions).

Q7. Question 7 asks the respondent about programs that impact placement of HUD code homes. The respondent is asked if their jurisdiction promotes the use of HUD code homes through any special incentives or programs. If the respondent answers yes, the respondent is asked if those incentives or programs are targeted to redevelopment or in-fill and also for a description of the incentives used. The respondent is also asked if the jurisdiction uses Community Development Block Grants, HOME or other federal funding in these programs and what percentage of HUD code homes were placed in areas targeted by these programs.

Q8. Question 8 is asked of all respondents. The respondent is asked to rate potential barriers to placement of HUD code homes in their jurisdiction. Information to be gained from this question is qualitative in that it asks for the respondent's opinion and cannot be obtained from documents or other means. Choices are Not applicable, Not a barrier, Minor barrier, Significant barrier, and Prevent HUD code homes.

A3 Extent of Use of Improved Technologies

The contractor will search the Internet for the websites of the 250 city or county governments in the sample as a means of collecting names and addresses for respondents. Since local government sites do not consistently provide an email address for their personnel, the contractor believes a mail survey is the most appropriate method for obtaining data. While most jurisdictions will have a planning director or other official with knowledge of regulatory codes, some jurisdictions have local commissioners that serve in that capacity. In such instances there is uncertainty about the respondent's familiarity with the Internet and comfort level for responding to an online survey. Also due to the nature of information being collected, the contractor believes a mail survey is the most appropriate method for obtaining data as compared to phone interviews, email, or Internet. In the event that following a first mailing and postcard reminder the respondent has not sent back a completed questionnaire, the contractor will send a second letter along with a replacement copy of the questionnaire. The second letter will offer the option of a telephone interview.

A4 Efforts to Identify Duplication

The contractor conducted a thorough literature review of regulatory barriers related to manufactured homes. There has been only one study to examine the extent and severity of local manufactured housing regulatory barriers nationwide (Sanders, 1998). However, the Sanders' study was not specific to metropolitan areas. HUD and the contractor are not aware of any national studies that examine the impact of local regulations on the placement of manufactured homes specifically in non-rural jurisdictions. The questionnaire described in this package only will be sent to CDBG eligible jurisdictions which by definition are located in metropolitan or suburban areas.

A5 Involvement of Small Entities

All respondents to this survey will be local public officials.

A6 Consequences of Less Frequent Data Collection

The proposed data collection is a one time event.

A7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public--General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

A8 Consultations Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, HUD published a Notice in the *Federal Register* announcing the Agency's intention to request an OMB review of this data collection. The Notice was published on Monday, April 24, 2006 in Volume 71, Number 78, page 21031, and provided a 60-day period for public comments. No comments were received during the comment period.

The data collection instrument was developed and pre-tested by the Virginia Tech Center for Housing Research in March 2006. Prior to pre-testing, members of the contracting team reviewed and revised the questionnaire numerous times. In conjunction with collecting quantitative information as a separate part of the overall study, the contractor contacted planning directors or other officials of CDBG-eligible communities and asked them to provide input as to availability of information, clarity, and ease of completion. Less than 10 officials were asked to participate in the pre-test.

A9 Payments to Respondents

No payments are being made to respondents who voluntarily agree to participate in this data collection.

A10 Arrangements and Assurances Regarding Confidentiality

The data set to be provided to the Government from this survey will not contain any identifying information—such as name, address, etc.—that would permit disclosure or identification of respondents or their jurisdiction. In a letter accompanying the questionnaire, the respondent is assured of confidentiality with the following statement. “Your responses will be completely confidential and will not be released or published in any form that could identify you or your jurisdiction.” In addition, the following statement is included on the questionnaire in the text preceding the questions. “Answering is completely voluntary and information provided will be held in the strictest confidence.” Confidentiality is an Institutional Review Board requirement for human subject research. Under the Common Rule regulations, all institutions receiving funds from federal departments/agencies (the Common Rule under HUD is contained with 24 CFR Part 60) are required to establish institutional review boards to review and monitor all research involving humans. The questionnaire described in this package has been submitted to the contractor’s IRB for review.

A11 Sensitive Questions

The questions asked are not considered sensitive. However, the questionnaire and survey process are subject to the contractor’s Institutional Review Board (IRB) rules and will be reviewed.

A12 Estimate of Annualized Burden Hours

Total annualized burden hours are estimated at 84. Figure 1 provides detailed information on the estimated time to complete the data collection and the total burden for the data collection effort.

Figure 1

	A	B	C	D	E	F	G
	Number of Respondents	Burden per Respondent (Minutes)	Total Annual Burden (Minutes)	Number of Responses	Total Respondent Burden (Minutes)	Total Burden per Respondent	Total Project Burden (Hours)
			(A x B)		(C x D)	(B x D)	
Survey, 2006	250	20	5000	1	5000	20	84

A13 Estimated Recordkeeping and Reporting Cost Burden on Respondents

The cost burden to respondents is the time required to respond to and mail back the questionnaire. No additional record keeping is required.

A14 Estimated Cost to the Federal Government

The total contracted cost to the Federal government for the survey component of the study described in this package is approximately \$16,614. The survey component includes questionnaire design, printing, and mailing as well as analyzing the data and writing summary and detailed reports. The cost breakdown is as follows: a total of \$1,210 for printing and mailing; a total of \$10,154 in labor including fringe (average of \$55 per hour); a total of \$5,250 in overhead.

Figure 2

	A	B	C	D	E	F	G
	Labor with fringe Principal Investigator	Labor with fringe Project Administrator	Total Labor (Includes questionnaire design, analyses, and report.)	Printing and Mailing Costs	Total Direct Costs	Overhead	Total Cost
	80 hrs x \$76.98	120 hrs x \$33.30	(A+ B)		(B +D)	E * 46.2%	(E+F)
Annualized Government Costs	\$6,158	\$3,996	\$10,154	\$1,210	\$11,364	\$5,250	\$16,614

A15 Reasons for Changes in Burden

This is a new data collection.

A16 Tabulation Plans, Statistical Analysis, and Study Schedule

When the data collection is completed in the spring of 2007, the contractor will analyze the data and prepare and submit an initial summary report to HUD by the summer of 2007. The contractor will include a detailed description of the results in the final report for the overall project to be submitted in fall of 2007.

Data will consist of respondents' input and opinions on how regulatory barriers impact the placement of manufactured homes in their jurisdiction. The information from the completed questionnaires will be entered into SPSS, the statistical package that will be used for analysis purposes. Frequencies will be run for all variables and the contractor will report on the grouped results. In addition, the contractor will run selected crosstabulations of variables. No complex analytical techniques are planned.

A17 Expiration Date Display Exemption

Any reproduction of the data collection instrument will prominently display the OMB approval number and expiration date.

A18 Exceptions to Certification

This submission, describing data collection, requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).

PART B. STATISTICAL METHODS OF DATA COLLECTION

B1 Potential Respondent Universe and Selection Methods

The contractor will mail a questionnaire to 250 planning directors or other local officials in selected urban and suburban jurisdictions (CDBG-eligible communities) in the U.S. The population of CDBG-eligible communities was selected because this group represents the major urban and suburban population centers in the country and the preponderant share of housing development in this country. The total universe includes 1,839 CDBG-eligible communities divided into three categories representing degrees of regulatory control. The 250 jurisdictions will be a random sample of CDBG-eligible communities identified as being in the mid-range category. The total number of jurisdictions in the mid-range category has yet to be determined, but the number is expected to be approximately 900 to 1,200.

B2 Sampling Plan

The contractor will conduct a survey based on a representative random sample of the CDBG-eligible community population in a manner conducive to a high degree of confidence and reliability. The study and survey design will take into account that any specific jurisdiction, particularly a county, may not have direct control over the housing approval process. The information collected from this survey is to supplement and bring perspective to the primary and secondary data collected from public records as part of the overall study.

The contractor will use a modified Dillman-technique for mailed surveys. The technique often generates response rates of 50-80% when the survey is of respondents with a direct interest in the survey content. The contractor anticipates that this will be the case among local administrators of code regulations affecting manufactured housing. The technique includes a personalized cover letter (the letter will be addressed to a person if a name is available, otherwise the letter will be addressed to Planning Director); a questionnaire designed for easy completion and return; a postage-paid, pre-addressed return envelope; a reminder post-card; and a second personalized letter to non-respondents that includes a replacement questionnaire and the option for completion over the phone.

Every effort will be made to achieve a high response rate. However, the data analysis resulting from the questionnaire is to augment and bring perspective to the overall study's primary statistical analyses of secondary data and public records that cover all or most of the universe of CDBG-eligible communities (this primary data collection and analysis of public records is not subject to OMB review).

B3 Procedures to Deal with Non-Response

In order to maximize response to the questionnaire, the contractor will use a modified version of the Dillman method for mailed surveys. Late returns (generally the third wave received after the second letter and replacement questionnaire are mailed) are analyzed as a sample of non-respondents and compared with early returns. This comparison provides a test of possible bias related to differences between non-respondents and respondents. In addition, the contractor will compare community characteristics (state regulatory regime, size, state, region) of respondents and non-respondents as an additional test of response bias.

B4 Pre-Testing of Procedures

In conjunction with collecting quantitative information as a separate part of the overall study, the contractor contacted planning directors or other officials of CDBG-eligible communities and asked them to provide input as to availability of information, clarity, and ease of completion of the questionnaire. Less than 10 officials were asked to participate in the pre-test.

B5 Persons Responsible for Statistical Aspects of the Design

Todd Richardson, Deputy Director of the Program Evaluation Division, is responsible for the statistical aspects of the survey design. He can be contacted at (202) 708-3700 x 5706.

ANNEX

The Annex contains:

- The questionnaire
- A copy of the *Federal Register* announcement for the questionnaire.

Annex A

**LOCAL REGULATORY PRACTICES AND MANUFACTURED HOMES
QUESTIONNAIRE**

LOCAL REGULATORY PRACTICES AND MANUFACTURED HOMES

Please answer the following questions about your jurisdiction’s practices regarding manufactured homes that we refer to as **HUD code** homes. A manufactured home (formerly known as a mobile home) is built to the Manufactured Home Construction and Safety Standards (HUD Code). Manufactured homes are built in the controlled environment of a manufacturing plant and are transported in one or more sections on a permanent chassis. These questions have been approved by the Office of Management and Budget number xxxxxxx, expiration xx/xx/xx. Answering is completely voluntary and information provided will be held in the strictest confidence. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB number. If you believe there is another person better suited to answer questions on regulations related to manufactured housing, please ask that person to complete this questionnaire. After answering all the questions, please promptly return the questionnaire in the envelope provided. Thank you for your valuable input and time.

Q1. In the past 5 years has your jurisdiction approved the placement or location of any new **HUD code** homes (please check the answer that best fits)?

No	Not Sure, Probably Not	Not Sure, Probably Yes	Yes
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If you answered Q1 as *No* or *Not Sure, Probably Not*:

Q1a. Does your jurisdiction ever allow **HUD code** homes to be used?

Yes Rarely No

If you answered Q1a as *Rarely* or *No*, please skip to Q8 at end.

If you answered Q1a as *Yes*:

Q1b. Please check which one of the following best describes your jurisdiction’s regulations on **HUD code** homes?

HUD code homes are allowed as a by right use in single-family zones, but there have been no requests to locate **HUD code** homes in the past 5 years.

HUD code homes are allowed in single-family zones on a temporary basis or with special or conditional use permits, but there have been no requests to locate **HUD code** homes in the past 5 years.

HUD code homes are restricted to designated “mobile home parks”, communities, or subdivisions, but we haven’t received any proposals for new parks in the past 5 years.

Please skip to Q6.

▼ If you answered Q1 as *Yes* or *Not Sure, Probably Yes*, please continue:

Q2. Approximately how many **HUD code** homes have been placed or located in your jurisdiction in the past 5 years?

1-10 11-20 21-30 31-40 41-50 51-99 100+

Q3. Does your jurisdiction:

1. Restrict **HUD code** homes to special zoning categories such as “mobile home parks”, communities, or subdivisions? Yes No

2. Require a special or conditional use permit for **HUD code** homes to be placed or located in single-family zones? Yes No

3. Allow **HUD code** homes as a by right use in one or more single-family zones if design standards are met? Yes No

4. Allow **HUD code** homes as a by right use in one or more single-family zones subject to the same rules as other housing? Yes No

If you answered *Yes* to #3. above:

Does the planning staff or building department have any discretion in the administration of these design standards?

No, the standards are fixed and clear.

Yes, describe _____

NA

How difficult is it for **HUD code** homes to meet these design standards?

They are easily met.

They can be met, but the standards significantly affect unit costs.

They are hard to meet.

NA

Q4. Has your jurisdiction approved any new “parks”, communities, or subdivisions for **HUD code** homes in the past 5 years?

Yes No



If *Yes*, how many “parks”, communities, or subdivisions for **HUD code** homes were approved?

_____ (please write in the number)

Q5. Approximately what proportion of **HUD code** homes placed or located in your jurisdiction in past 5 years have been in:

HUD code parks, communities, or subdivisions?

0-24% 25-49% 50-74% 75-89% 90%+ DK

In-fill in older single-family neighborhoods?

0-24% 25-49% 50-74% 75-89% 90%+ DK

New single-family subdivisions (not restricted **HUD code** homes)?

0-24% 25-49% 50-74% 75-89% 90%+ DK

Q6. Does your jurisdiction require a special or conditional use permit or other permit if **HUD code** homes are placed or located in single-family zones (other than designated mobile home parks, communities, and subdivisions)?

Yes No

Q7. Does your jurisdiction promote the use of **HUD code** homes through any special incentives or programs?

Yes ↓ No (Please skip to Q8)



If you answered *Yes* to Q7:

Are these incentives or programs targeted to redevelopment or in-fill?

Yes ↓ No NA



If *Yes*, please describe the incentives used: _____

Do you use Community Development Block Grants (CDBG), HOME or other federal funding in these programs?

Yes No NA

Of the **HUD code** homes placed or located in your jurisdiction in the past 5 years, what percentage of homes were placed in areas targeted by these programs?

Less than half 50%-74% 75-89% 90%+ DK NA

Q8. For your jurisdiction, please rate the following potential barriers to **HUD code** homes
(please check one box per barrier):

	Not Applicable	Not a Barrier	Minor Barrier	Significant Barrier	Prevent HUD code Homes
Fees		1	2	3	4
Permits		1	2	3	4
Deed restrictions/covenants		1	2	3	4
Wind standards		1	2	3	4
Snow load standards		1	2	3	4
Fire codes		1	2	3	4
Zoning codes		1	2	3	4
Subdivision regulations		1	2	3	4
Architectural design standards		1	2	3	4
Citizen opposition		1	2	3	4
Environmental regulations		1	2	3	4
Historic district regulations		1	2	3	4
High land costs		1	2	3	4
Not much land (built-out)		1	2	3	4
No new HUD code parks, communities, or subdivisions approved		1	2	3	4
Insufficient demand for HUD code homes		1	2	3	4

THANK YOU! Please make sure you have answered all the questions and return the questionnaire in the envelope provided to:

Casey Dawkins, Ph.D.
Center for Housing Research, Mail Code 0451
Virginia Tech
Blacksburg, Virginia 24061

To receive the results of this survey, please provide us your email address or mailing address:
