

SUPPORTING STATEMENT – PART A
U.S. Department of Commerce
U.S. Census Bureau
Survey of Construction Questionnaire for the Building Permit Official (SOC-QBPO)
OMB Control No. 0607-0125

A. Justification

1. Necessity of the Information Collection

The information collected on the SOC-QBPO is necessary to carry out the sampling for the Survey of Housing Starts, Sales and Completions (OMB number 0607-0110), also known as the Survey of Construction (SOC). Government agencies and private companies use statistics from SOC to monitor and evaluate the large and dynamic housing construction industry. The SOC and this collection are authorized under Title 13, United States Code, Section 182.

The U.S. Census Bureau is requesting a revision of the currently approved collection. The current approval for this survey is scheduled to expire on March 31, 2009. The SOC-QBPO is an electronic questionnaire. Census Bureau field representatives (FRs) use Computer Assisted Personal Interviewing (CAPI) to collect the data. The CAPI software for all SOC data collection is being rewritten and modernized to work on laptop computers with the Microsoft Windows operating system. As part of this revision, the Census Bureau identified improvements to the SOC-QBPO questionnaire, including eliminating questions that are no longer necessary and adding new data items to improve the sampling for the Survey of Construction.

2. Needs and Uses

The Census Bureau FRs use the SOC-QBPO to obtain information on the operating procedures of a permit office. This enables them to locate, classify, list, and sample building permits for residential construction. These permits are used as the basis for the sample selected for SOC. The Manufacturing and Construction Division (MCD), within the Census Bureau, also uses the information to verify and update the geographic coverage of permit offices.

Failure to collect this information would make it difficult, if not impossible, to accurately classify and sample building permits for the SOC. The SOC produces data for two principal economic indicators: New Residential Construction (housing starts and housing completions) and New Residential Sales. Information from the SOC is also used in the estimation of the value of new residential construction put in place for the Census Bureau's data on construction spending.

Information quality is an integral part of the pre-dissemination review of information

disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Use of Information Technology

The SOC-QBPO is an electronic questionnaire. The FRs use Computer Assisted Personal Interviewing (CAPI) to collect the data. A printed version of the questionnaire will be provided to each respondent to document the questions that are asked in the interview and to provide the expiration date of the OMB approval of the survey. See Attachment A.

4. Efforts to Identify Duplication

Some duplication exists between the SOC-QBPO and the Form C-411, "Survey of Building and Zoning Permit Systems" (OMB number 0607-0350). The questions related to geographic coverage of the permit jurisdiction are similar to questions on the C-411 form.

The C-411 form provides limited information to maintain the universe for the Building Permits Survey (OMB number 0607-0094) and the SOC. The C-411 is used to learn about changes to existing permit-issuing jurisdictions, identify new permit-issuing jurisdictions, and to verify geographic coverage. The C-411 is typically used only once every ten years or when we have reason to believe that changes to permit systems were made. In addition to questions about geographic coverage, Form SOC-QBPO asks about the classification of permits for various types of residential buildings, the procedures for permit expiration and the issuance of extensions, the filing system for the permit office, and the availability of the records. This information is all necessary to properly carry out the sampling of permits for the SOC.

5. Minimizing Burden

Information is collected for only 900, or 4.5 percent, of the 20,000 permit-issuing places. Furthermore, interviews are conducted only when the place is initially selected for the SOC sample and, thereafter, whenever the permit official or office procedures change, usually once a year.

As part of the redesign of the questionnaire, the Census Bureau reviewed the questions for relevance and determined that information about the issuance of permits for groups of buildings, occupancy permits, and permits for manufactured homes is no longer needed to allow permits to be properly sampled for the SOC. These questions were removed from the new SOC-QBPO. The organization and flow of the interview have also been improved.

SOC FRs have reported that many permit offices are now classifying some permits for residential buildings, such as permits for rental apartments, as commercial permits. The commercial permits are often filed separately in the office, so it is critical for the SOC FR to learn whether commercial permits must be reviewed when listing permits to be sampled for the SOC. Because of this, questions about the classification of permits as commercial have been added to the new SOC-QBPO. Due to the addition of these questions, the overall burden will be essentially unchanged from the old questionnaire.

Each respondent will receive a letter explaining the purpose of the survey. The letter also states that the survey is voluntary and provides the OMB number and the information about the response burden. See Attachment B.

6. Consequences of Less Frequent Collection

Less frequent interviewing would jeopardize the SOC sampling process and accuracy of the statistics which are produced.

7. Special Circumstances

The collection of these data is consistent with the Office of Management and Budget (OMB) guidelines.

8. Consultations Outside the Agency

In January 2008, a sample of building permit officials who had recently completed a SOC-QBPO interview was consulted relative to the availability of data and the clarity of the questionnaire.

There were no problems mentioned during the consultations. Each respondent stated the data were readily available and the questions were easy to understand (Attachment C). The officials contacted were as follows:

- a. Andrea Eastman
Administrative Assistant
Holly Village Building Permit Office
202 S Saginaw Street
Holly, MI 48442
(248) 634-9571

- b. Rhonda Blackmon
Administrative Assistant
Doraville Building Permit Office
3725 Park Avenue
Doraville, GA 30340
(770) 451-8745

- c. Leslie Harris
Permit Clerk
Benbrook Building Permit Office
911 Winscott Road
Benbrook, TX 76126
(817) 249-3000

- d. Andrea Effinger
Technical Assistant, Office of Construction
Hammonton Town Building Permit Office
Town Hall - Central Avenue/3rd Street
Hammonton, NJ 08037
(609) 567-4300 ext. 108

- e. Amanda Baker
Code Enforcement Secretary
Cedar Hill Building Permit Office
P.O. Box 96
Cedar Hill, TX 75104
(972) 291-5100

On December 27, 2007, we published a notice in the Federal Register (Vol. 72, pg. 73311) inviting public comments on our plans to submit this request. We received three comments during the 60-day comment period:

The first comment opposed the Census Bureau spending taxpayer dollars to collect these data on annual basis. The Census Bureau needs these data on an annual basis to ensure that we can provide accurate, current statistics on residential construction, e.g., housing starts and housing sales, that are needed by economic policymakers to monitor the large and dynamic construction sector of

the economy.

The second comment was from the U.S. Bureau of Economic Analysis (BEA) and stated that the data collected in this survey are crucial to key components of BEA's economic statistics, in that the information from this survey is used in the Census Bureau's Survey of Construction to prepare estimates for the construction spending (value of construction put in place) series, which are used to prepare estimates of the residential and nonresidential structures components of gross domestic product (GDP) and of the output of the construction industry for the input-output and GDP by industry accounts.

The third comment was from the National Association of Home Builders (NAHB) and stated that the NAHB strongly supports the rewriting of the questionnaire in a way that will improve the sampling for the Survey of Construction. The NAHB requested more details about the changes to the questionnaire, which we have provided to them.

9. Paying Respondents

The Census Bureau does not pay respondents nor provide gifts in return for complying with the survey.

10. Assurance of Confidentiality

The information collected on the SOC-QPBO is not confidential. The introduction to the questionnaire includes a statement which the FR reads to respondent; this statement indicates that the survey is voluntary. This information also appears on the letter provided to each respondent.

11. Justification for Sensitive Questions

The SOC-QPBO contains no sensitive questions.

12. Estimate of Hour Burden

Reporting burden is calculated as follows:

Frequency	Total Respondents	Responses per Respondent	Total Annual Responses	Avg. Burden Hour per Response	Total Burden (hours)
Annual	900	1	900	.25	225

There are 900 respondents contacted once a year. Based on our experience and information from the respondents, we estimate that the average time to complete an interview is 15 minutes, resulting in a total annual response burden of 225

hours.

The cost to the respondents is estimated to be \$4,604 based on an average hourly salary of \$20.46* for state and local government employees.

*Taken from the Census Bureau's Annual Survey of State and Local Government Employment, 2006.

13. Estimate of Cost Burden

We do not expect respondents to incur any costs other than that of their time (as estimated in item 12) to respond. The information requested is of the type and scope normally carried in office records and no special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents are not expected to incur any capital and start-up costs or system maintenance costs in responding. Further, purchasing of outside accounting or information collection services, if performed by the respondent, is part of usual and customary business practices and not specifically required for this information collection.

14. Cost to Federal Government

The total cost in FY 2007 for the Survey of Construction program of which this questionnaire is a part was \$8,149,000. Of this amount, \$2,774,000 was borne by the Department of Housing and Urban Development, and \$5,375,000 was borne by the Census Bureau.

15. Reason for Change in Burden

There is no change in the response burden.

16. Project Schedule

Information collected is used to execute SOC sampling and is not tabulated or published.

17. Request to Not Display Expiration Date

The SOC-QPBO is an electronic questionnaire. A printed version of the questionnaire will be provided to each respondent to document the questions that are asked in the interview and to provide the expiration date of the OMB approval of the survey. See Attachment A.

18. Exceptions to the Certification

There are no exceptions.