

SUPPORTING STATEMENT – PART A
U.S. Department of Commerce
U.S. Census Bureau
Survey of Residential Building or Zoning Permit Systems (C-411)
OMB Control No. 0607-0350

A. Justification

1. Necessity of the Information Collection

The U.S. Census Bureau is requesting an extension of a currently approved collection for Form C-411, “Survey of Residential Building or Zoning Permit Systems” (Attachment A). The Census Bureau is authorized under Title 13, United States Code, Sections 9(b), 161, and 182 to collect information on new residential buildings.

The Census Bureau produces statistics used to monitor activity in the large and dynamic construction industry. These statistics help state and local governments and the federal government, as well as private industry, to analyze this important sector of the economy. The accuracy of the Census Bureau statistics regarding the amount of construction authorized depends on data supplied by building and zoning officials throughout the country. The Census Bureau uses Form C-411 to obtain information from state and local building permit officials needed for updating the universe of permit-issuing places which serves as the sampling frame for the Report of Privately-Owned Residential Building or Zoning Permits Issued (OMB number 0607-0094), also known as the Building Permits Survey (BPS), and the Survey of Housing Starts, Sales, and Completions (OMB number 0607-0110), also known as Survey of Construction (SOC). These two sample surveys provide widely used measures of construction activity, including the economic indicators New Residential Construction and New Home Sales. The questions on Form C-411 pertain to the legal requirements for issuing building or zoning permits in the local jurisdictions. Information is obtained on such items as geographic coverage and types of construction for which permits are issued.

2. Needs and Uses

The form is sent to jurisdictions when the Manufacturing and Construction Division (MCD) has reason to believe that a new permit system has been established or an existing one has changed. This is based on information from a variety of sources including survey respondents, regional councils and Census’ Geography Division which keeps abreast of changes in corporate status. Responses typically approach 85 percent.

Failure to maintain the universe of permit-issuing places would result in deficient

samples and inaccurate statistics. This in turn jeopardizes the accuracy of the above mentioned economic indicators. These indicators are closely monitored by the Board of Governors of the Federal Reserve System and other economic policy makers because of the sensitivity of the housing industry to changes in interest rates.

We use the information to verify the existence of new permit systems or changes to existing systems. Based on the information, the MCD adds new permit-issuing places to the universe, deletes places no longer issuing permits, and makes changes to the universe to reflect those places that have merged. No changes are planned to the version of Form C-411 that is currently in use.

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

We do not use electronic techniques for this survey. We mail this form once to new permit-issuing places and to existing places only when we believe that the building permit system has changed. The form requests the website used by the permit jurisdiction and the email address of the contact person to allow further followup to be done electronically.

4. Efforts to Identify Duplication

Some duplication exists between the Form C-411 and the Survey of Construction Questionnaire for the Building Permit Official (SOC-QBPO; OMB Control No. 0607-0125). The questions related to geographic coverage of the permit jurisdiction on Form C-411 are similar to questions in the SOC-QBPO interview. The SOC-QBPO interview is administered annually to the 900 building permit offices that have been sampled for the Survey of Construction. Form C-411 is needed to update the coverage of the remaining 19,000 permit jurisdictions which have not been sampled for SOC. Also, if the SOC-QBPO interview indicates that permit coverage has changed, this information is used to update the survey universes so that the jurisdiction is not also required to complete Form C-411.

5. Minimizing Burden

The C-411 is used to learn about changes to existing permit-issuing jurisdictions, identify new permit-issuing jurisdictions, and to verify geographic coverage. Response burden to individual respondents is minimal because Form C-411 is typically used only once every ten years or when we have reason to believe that

the building permit system for a jurisdiction has changed.

6. Consequences of Less Frequent Collection

If we collected these data less frequently, we could not maintain an up-to-date sampling frame of permit-issuing places. Failure to maintain the universe would result in deficient samples and inaccurate statistics. This in turn jeopardizes the accuracy of the economic indicators, New Residential Construction and New Home Sales. These indicators are closely monitored by the Board of Governors of the Federal Reserve System and other economic policy makers because of the sensitivity of the housing industry to changes in interest rates.

7. Special Circumstances

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

8. Consultations Outside the Agency

During May 2008, we contacted the following municipal jurisdictions to obtain their views on the availability of information being collected.

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

- a. Tori Kittel
Office Administrator for Mesa County
P.O. Box 20000 5005
Grand Junction, CO 81501
(970) 244-1658

- b. Christina Morton
Secretary for Kent County Unincorporated Area
555 Bay Rd
Dover, DE 19901
(302) 744-2445

- c. Gloria Schleef
Zoning Administrator for Iroquois County Unincorporated Area
1001 E Grant
Watseka, IL 60970
(815) 432-6995

- d. Barb Barnett
Zoning Administrator for Clay County Unincorporated Area
111 W Fairfield St
Clay Center, NE 68933
(402) 762-3868
- e. Elaine Jardine
County Planning Director for Tioga County Unincorporated Area
56 Main St
Owego, NY 13827
(607) 687-8257
- f. Michelle Fasnacht
Secretary Administrator for Lebanon County Part Unincorporated Area
400 S 8th St
Lebanon, PA 17042
(717) 274-2801
- g. Shari Ginther
Office Manager for Benton County Unincorporated Area
5600 W Canal Pl Ste C105A
Kennewick, WA 99336
(509) 735-3500

We also published a notice in the Federal Register (Vol. 73, No. 77, Page 21307) on April 21, 2008, inviting public comments on our plans to submit this request.

We received one written comment during the 60-day comment period. The comment was from Paul Emrath, the Assistant Staff Vice President for Housing Policy Research for the National Association of Home Builders (NAHB). Mr. Emrath expressed the NAHB's strong support for this data collection as the "critical first step in the process that generates virtually all of the timely and nationally representative data on residential construction activity in the United States."

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 Form C-411 is public information and is not confidential. We will inform the respondents that this is a voluntary survey in a letter signed by the chief of MCD (Attachment C).

11. Justification for Sensitive Questions

The Form C-411 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	2000	1	2000	.25	500

Based on information from the respondents, we estimate that the average time to complete the form is 15 minutes, resulting in a total annual response burden of 500 hours.

The cost to the respondents is estimated to be \$10,045 based on an average hourly salary of \$20.09* for state and local government employees.

*Taken from the Census Bureau's 2006 Annual Public Employment Survey.

13. Estimate of Cost Burden

We do not expect respondents to incur any costs other than that of their time to respond. The information requested is of the type and scope normally carried in state or local government office records and no special hardware or software system is necessary to provide answers to this information collection. Therefore, respondents are not expected to incur start-up costs or system maintenance costs in responding. Further, there is no need to purchase outside information collection services.

14. Cost to Federal Government

The estimated total cost for Fiscal Year 2008 of the Building Permits Program, of which this questionnaire is a part, is \$2,252,000, all borne by the Census Bureau.

15. Reason for Change in Burden

There is no change in the response burden.

16. Project Schedule

We collect the information on a continuous basis. This information is stored in a

database and is used to maintain and update our universe of permit-issuing places and to select new samples for the Building Permits Survey and Survey of Construction every 10 years.

17. Request to Not Display Expiration Date

The expiration date will be printed on the form.

18. Exceptions to the Certification

There are no exceptions.