

SUPPORTING STATEMENT

A. Justification

1. Necessity of Information Collection

We request clearance for the proposed questions to be used on a special American Housing Survey in the New Orleans metropolitan area. We will ask a series of questions specifically related to the impact of Hurricane Katrina. This will be a one-time special survey with the goal of providing information about people who rebuilt or rehabilitated their homes as a result of Hurricane Katrina, or are still in the process of renovating their homes; people who were living in New Orleans pre-Katrina, but who have moved to a different address in the New Orleans metro; and property that existed pre-Katrina, but has not been restored or where a person is living in a trailer on a lot. The last time we conducted the AHS in the New Orleans metropolitan area was in 2004. We will collect data between July 27 and November 16, 2009.

This is a new collection.

The AHS samples will show the characteristics of the current housing inventory; costs of shelter; amount and types of changes in the inventory; the physical condition of the inventory; the characteristics of the occupants; the people eligible for and beneficiaries of assisted housing by race and ethnicity; and the number and characteristics of housing vacancies, including separate data on units for rent or sale. With a few exceptions, we will use the same questions on both surveys.

Title 12, United States Code, Sections 1701z-1, 1701z-2(g), and 1701z-10a provide authority to collect this information.

The Department of Housing and Urban Development (HUD) uses the information from the AHS to prepare the President's *National Urban Policy Report* "State of the Cities" in accordance with the Housing and Urban Development Act of 1970, Public Law 91-609, as amended in 1977. HUD also uses these data to prepare other special reports for Congress and its committees concerning the effect of legislation on the housing stock.

The data collection procedures and questionnaire content for the New Orleans survey are identical to the currently approved 2009 survey (2582-0017) except we are adding additional or modified questions to the Home Improvements & Repairs (HMR) and Recent Mover (RMOV) modules to examine the special circumstances of the aftermath of Hurricane Katrina. Please refer to the attached items booklets for the questions in these modules and the entire AHS questionnaire.

4) We will also continue an action started with the 2005 AHS-N to improve the quality of our sample, by introducing about 30 special living units in the 2009 New Orleans AHS-MS. A special living unit is where the resident is self-sufficient and lives independently but can get help with certain services like meals, transportation, finances, and personal care. A special living unit meets the Census 2000 definition of a housing unit in that the resident lives separately from others on the property and has direct access from outside or a common hallway. These units had no chance of coming into sample between 1990 and 2000 due to sampling limitations. Most are age-restricted communities but some serve the disabled of all ages.

We also request clearance for the reinterview questions to be used in conjunction with this survey. We will conduct a second interview at approximately 7 percent of the total addresses in the survey for the purpose of interviewer quality control. The reinterview content includes selected questions from the original interview. We included in this clearance the cost and respondent burden estimates for the reinterview.

2. Needs and Uses

The AHS interviews both occupied and vacant housing units intended for occupancy. At occupied units, the respondents are household members age 16 and older for which the unit is their regular place of residence. The preference is to interview the “householder,” the person who owns or rents the home. At vacant units, the respondents are the owners of the home or their designated spokespersons like rental agents, attorneys, friends, or family members. If the owner cannot be identified, the respondent may be a neighbor who is knowledgeable about the unit.

National and local policy analysts, program managers, budget analysts, and Congressional staff use the AHS data to advise executive and legislative branches about housing conditions and the suitability of policy initiatives. Academic researchers and private organizations also use the AHS data in efforts of specific interest and concern to their respective communities. The Census Bureau maintains a bibliography on the Internet that lists analytical reports. This site can be found at:

<http://www.census.gov/hhes/www/housing/ahs/bib.html>.

The matrix below outlines the eight categories of the AHS questions and specific HUD (Office of Policy Development and Research) applications of the data produced under each category.

AHS QUESTIONNAIRE CONTENT CATEGORIES								
HUD	Building and Unit Characteristics	Quality	Utilities	Neighborhood	Housing Mobility	Housing Costs	Household Characteristics	Income
Affordable (formerly "Worst case") Housing Needs	!	!	!		!			!
Fair Market Rents	!	!	!		!	!		
GSE Reports	!			!	!	!	!	!
Civil Rights Data Report							!	
Tax Policy			!		!	!	!	!
General Research and Policy Support	!	!	!	!	!	!	!	!
House Ownership Goals	!		!			!	!	!

"HUD" refers to the Office of Policy Development and Research - Application of AHS Data: Reports, Programs, and Issues.
 "Building and Unit Characteristics" includes size, type, and location.
 "Quality" includes breakdowns, equipment, repairs, and improvement.
 "Utilities" includes cost and fuel.
 "Neighborhood" includes quality.
 "Housing Mobility" includes household formations and housing consumption patterns.
 "Housing Costs" includes subsidies and financing.
 "Household Characteristics" includes age, race, sex, and other demographic data.
 "Income" includes wage and salary income, sources of non-wage income, and family and household income.

HUD needs the AHS data on building and unit characteristics, prices, and on housing and income characteristics for a wide variety of subgroups for two important basic uses. First, with these data, policy analysts can monitor the interaction among housing needs, demand, and supply, as well as changes in housing conditions and costs, to aid in the development of housing policies and the design of housing programs appropriate for different groups. Second, program support staff can analyze changes affecting housing conditions of particular subgroups, such as low-income female householders, minorities, first-time home buyers, and the elderly, to assess the continuing usefulness of programs when economic conditions in the housing market change.

In addition, these data can be used to evaluate, monitor, and design HUD programs to improve efficiency and effectiveness. HUD also uses these data for identifying issues for future programs; evaluating the diversity among housing markets in supply, costs, and affordability; identifying where, and for whom, remedial federal programs may be most needed; and other purposes.

From a HUD policy perspective, the AHS data probably have proved most valuable in analyzing the potential effects of program design and redesign proposals. Past data have enabled HUD, for instance, to determine under what conditions a moderate income, multifamily construction program might be needed and feasible; to examine the effect of low vacancy rates on housing maintenance and quality; and to evaluate how housing assistance programs help welfare recipients.

The AHS data are also used to estimate the size of the market, by measuring the number of affordable rental units in the housing stock. The AHS provides information on the degree to which rents are affordable to low- and moderate-income families and to very-low-income families; these are two of the most important parameters in HUD's market sizing models for the housing goals.

HUD's field offices find the AHS an important source of information to update decennial census data relating to housing assistance needs of individual localities. HUD developed a computer system now in use that permits comparison of current AHS data with the 1970, 1980, 1990, and 2000 decennial censuses in order to determine changes in low-income household characteristics and housing conditions. The estimates developed through the use of this system have enabled them to identify significant trends in family size, composition, income levels, and tenure of occupancy. HUD makes these estimates available to communities for use in developing needs assessments for their local housing plans. HUD field office economists also use them to evaluate market feasibility of assisted-housing proposals.

Information quality assessment is an integral part of the predissemination review of information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality assurance 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

a. Data Collection

The U.S. Census Bureau began conducting all the AHS interviewing with computers with the 1997 AHS-N enumeration. A Census Bureau FR conducts the interview and enters the respondent's answers on a laptop computer. The use of computers allows greater use of dependent interviewing, which means that a few questions, such as year built and the presence of a basement, will not have to be asked in future enumerations and that a larger number of questions can be verified rather than asked directly. This will decrease respondent burden for households in sample for future enumerations. We deem the use of computer-assisted personal

interviewing the most appropriate collection methodology given existing available information technology. For 2007, we upgraded the programming software used on the survey from CASES DOS to the BLAISE for Windows system to stay current with computer technology. The BLAISE for Windows system improved the quality of the screen displays and the ability of the FRs who collect the data to navigate through the instrument.

The AHS does not collect data via the Internet or through the Electronic Data Interchange because of the significant investment in time and research needed to establish these types of electronic reporting in an ongoing survey. The Census Bureau tested an Internet reporting option in the SIPP Methods Test Panel. The Census Bureau coded an instrument in Java script that was made available to a selected group of respondents to the first field test undertaken for the August/September 2000 data collection period. College graduates were asked if they were willing to participate in a Web-based study. Those who answered “yes” were contacted in early 2001 and provided with an identification code and password to access the questionnaire via the Web. The Census Bureau concluded from the results that the technology is not currently sophisticated enough to handle the complexity of a large scale demographic survey instrument and the complicated skip patterns and rostering that it entails. The low response rate combined with the technological challenges and limitations indicate that the costs of converting a complex questionnaire to an online survey far outweigh the benefits even in a multimode environment. The Census Bureau continues researching the matter as new technology becomes available. If it proves to be feasible at some point, the Census Bureau will have to plan a statistically sound method of assessing the effects of a new mode of data collection on AHS estimates, as was done when the AHS questionnaire was redesigned and became fully automated in 1997.

b. Data Dissemination

HUD currently makes the information collected on the AHS available to the public on their Internet website. The Census Bureau has a website that complements HUD's. The Census Bureau's website also contains an extensive set of tables for the users' convenience. We will also make these data available in printed publications.

4. Efforts to Identify Duplication

HUD consulted with other government agencies and determined that the AHS is the only data source with detailed information on the physical condition of the housing inventory and of rents of housing units. Although housing data are collected as part of the American Community Survey (ACS) (Census Bureau), Consumer Expenditure Survey (CES) (Bureau of Labor Statistics), and the Residential Energy Consumption Survey (RECS) (Department of Energy), these surveys provide neither the longitudinal data over a period of years nor the extensive level of detailed information

available from the AHS. The CES collects housing costs data but does not collect detailed information on vacant units. The RECS does not collect mortgage or detailed housing cost data. Neither the ACS nor the RECS have detailed information on the physical condition of housing units or information on vacant units. Thus, these datasets could not serve as substitutes for the measures produced by the AHS that detail affordable (formerly “worst case”) housing needs, fair market rents, the lending activities of GSEs, or progress toward homeownership goals, to cite a few.

The purposes of the AHS and the other surveys cited above also differ according to the agency’s goals and objectives. Certainly HUD surveys would involve personal/household behavior with respect to housing and community development issues. But human behavior in general is conditional on fundamental familial, demographic, housing, and economic variables. As a general rule, HUD is not interested in the levels of individual variables, but in the relationships among variables. Therefore, they must observe the values of the variables for the same individuals in the same sample to capture covariance structure. (All multivariate statistical procedures rely on the covariance structure.) The AHS asks about the same fundamental variables, but goes further and asks numerous detailed questions about other aspects of housing consumption, finance, moving, and neighborhoods. In order to understand human behavior and detailed housing information, HUD needs to know how the fundamental housing variables impact or are related to the more detailed housing variables. It would make no sense to collect detailed information about housing cost burdens and mortgage financing if we had no idea about fundamental housing attributes such as size, value, or rent of the housing unit.

5. Minimizing Burden

We have designed the AHS questions to obtain the required information, while keeping respondent burden to a minimum. The data are collected only from individual households not small businesses or other small entities. We have also increased the usage of dependent interviewing in a way that decreases respondent burden but improves data consistency.

6. Consequences of Less Frequent Collection

As a longitudinal survey, we interview our samples periodically to provide intermittent readings between decennial censuses. The length of time between interviews is two years on the AHS-N sample and six to eight years on the AHS-MS sample. Less frequent enumerations would impair HUD's ability to monitor GSE goal compliance on a timely basis. It would also reduce HUD's ability to detect changes in severe housing needs. Without this ability, the Administration and Congress would be unable to formulate policy on housing assistance.

7. Special Circumstances

We collect the data in a manner consistent with OMB guidelines, and there are no special circumstances.

- 8.** HUD published an emergency Federal Register Notice on June 10. No comments were received.

Consultations Outside the Agency

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During the development of the 1984 AHS-MS questionnaires, which were precursors to the 2009 AHS questionnaires, we consulted with approximately 250 prospective data users who comprised diverse areas of interest. Responses received from these data users had considerable effect on the content. There were no major problems that could not be resolved during consultation.

HUD listed and addressed the majority of the comments received during the development of the core questionnaire with the clearance package submitted for the 1984 AHS-MS. Subsequent to the 1984 AHS-MS submission, BEA raised a series of suggested modifications, some of which would result in improvements to BEA's estimates and others that were suggested to improve the clarity and consistency of the forms. Further discussions involving representatives from BEA and the Census Bureau resulted in agreements to make several modifications to the core questionnaire.

HUD and the Census Bureau conducted a major review of the questionnaire content in the summer of 2004 paying special attention to suggestions submitted by data users. This was an interactive session in that HUD used their website to involve the data user community in the review and final decisions made on the proposals considered. We will review the subject matter areas affected in Section B-4, Testing Procedures.

The Center for Survey Methods Research at the Census Bureau did an expert review of the new AHS New Orleans Hurricane Katrina related questions. We held a session with HUD to review the proposals and made final decisions on the content.

9. Paying Respondents

The AHS does not give respondents payments or gifts.

10. Assurance of Confidentiality

The Census Bureau collects these data in compliance with the Privacy Act of 1974 and OMB Circular A-108. The Census Bureau will send each sample address a letter in advance of the interview containing the information required by this act. Returning housing units in the AHS-N will receive the AHS-27 letter. The new incoming units in the AHS-N and all units in the AHS-MS will receive the AHS-26/66 letter. The

only difference between the letters is the mode of contact mentioned. The AHS-27 letter indicates the contact is more likely to be by telephone to update the information collected two years ago. The AHS-26/66 letter indicates that the contact is more likely to be in-person.

The Advance Letter informs the respondents of the voluntary nature of this survey and states that there are no penalties for failure to answer any question. The letter explains why the information is being collected, how it will be used, and that it will take approximately 30 minutes to complete the interview. The letter displays the OMB control number and date of expiration.

As part of the introduction for personal-visit households, the Census Bureau Field Representatives (FRs) will ask the respondents if they received the Advance Letter. If not, the FRs will give the letter to the respondents and allow them sufficient time to read the contents. For interviews conducted by telephone, if the respondents inquire as to the purpose of the survey, the FR will provide an oral explanation that includes the information required by the Privacy Act. We also display the address and toll-free phone number of the regional office for which the FR works as a way for the respondent to authenticate her/his employment with the Census Bureau.

After the interview is completed, the FRs will give the respondents a "Thank You" Letter (AHS-28/68(L)). Both the Advance Letter and the Thank You letter state that all information respondents give to the Census Bureau employees is held in strict confidence by Title 13, United States Code. Each FR has taken an oath to this effect and is subject to a jail term, fine, or both, if he/she discloses any information given him/her.

The data collected under this agreement are confidential under Title 13, U.S.C., Section 9. Should HUD staff require access to Title 13 data from this survey to assist in the planning, data collection, data analysis, or production of final products, those staff members are required to obtain Census Bureau Special Sworn Status (SSS). They must demonstrate that they have suitable background clearance and they must take Title 13 Awareness Training.

Any access to Title 13 data at HUD is subject to prior approval by the Census Bureau's Data Stewardship Executive Policy Committee upon assurance that HUD facility and information technology security meet Census Bureau requirements.

11. Justification for Sensitive Questions

The survey does not include any questions of a sensitive nature.

12. Estimate of Hour Burden

We estimate that the total respondent burden hours for the New Orleans metropolitan special survey will be 3,027. Please refer to the table below for more detailed information.

Interview Type		Total Addresses	Respondent Burden	
(A) Name	(B) Definition	(E) Total Addresses	(F) Avg Min Per Intv	(G) Total Hours
Occupied	Sampled addresses with one or more residents	4,516	39	2,710
Vacant	Sampled addresses intended for occupancy but currently without residents	736	20	245
Noninterview	Sampled addresses not intended for occupancy or occupants refuse to participate	924	0	0
Total Addresses For Data Collection (DC)		6,176		
Reinterview	Second quality control check interview at 7 percent of the above sampled addresses	432	10	72
Total DC and Reinterview Addresses/Burden Hours		6608		3,027
Computations				
Total Hours = (Average Minutes Per Case*Total Addresses)/60				

13. Estimate of Cost Burden

The annualized cost estimate to respondents for burden hours is \$0. There are no costs to respondents other than that of their time to respond.

14. Cost to Federal Government

HUD estimates the annual costs to the government for the AHS programs (including the AHS-N, the regular AHS-MS, and the New Orleans survey) to be about \$18 million. The annual figure provided represents the average of a two-year cycle consisting of a data collection year followed by a public use file (PUF) products processing year. The figure is based on the following factors.

- Actual money spent adjusted for inflation to complete past data collection and release public use files for the AHS-N and AHS-MS.
- Projected costs to maintain the computer assisted interviewing (CAI) system that stays current with technology. The CAI system includes the questionnaire instrument loaded to the laptop computers used to conduct the interviews, the case management system used to relay work back and forth to the FRs in the field, and the post data collection system used to process the data and produce the public use files.
- Actual money spent adjusted for inflation to maintain the AHS-N and AHS-MS samples in a non-data collection year. Maintenance includes completing the work to release the public use file for the AHS-N sample and the Seattle metropolitan area in the AHS-MS.

The estimated cost to conduct the AHS in the New Orleans metropolitan area is approximately \$2.6 million for a two-year period.

HUD will bear these costs through an office that has planned and allocated resources for the effective and efficient management of the information developed for this collection effort.

15. Reason for Change in Burden

This is a new collection. The New Orleans metropolitan survey is an addition to the 2009 data collection.

16. Project Schedule

The Census Bureau has scheduled the 2009 joint field enumeration for the AHS-N and AHS-MS surveys to begin in May and continue through September. While many of the operations to tabulate and publish the data will be performed together, the Census Bureau will release the AHS-N public use file (PUF) followed by the AHS-MS file. The projected release dates are January and May of 2010, respectively, which is about four months earlier than in 2007. We adjusted the processing system for the CAI instrument conversion to BLAISE and the new joint National/Metro collection format allowing a return to the routine schedule that existed before these changes. We expect to reduce time slightly in the future through continued streamlining and technological advances.

The Census Bureau will issue press releases and/or product announcements when releasing the micro-data PUF, as well as reports containing a summary of the data collected as agreed upon with HUD. The summary reports will provide selected statistics at the national or metropolitan sample level involved. The Department of Commerce or HUD may release other publications.

AHS-N: The Census Bureau is scheduled to release the final reports about 7 months after data collection.

AHS-MS: The Census Bureau is scheduled to release the final reports about 3 months after the AHS-N release. There will be a separate set of reports for the Seattle metropolitan area and the five large metropolitan areas in the AHS-N supplementary sample – New York, Northern New Jersey, Philadelphia, Detroit, and Chicago.

AHS New Orleans: The Census Bureau is scheduled to complete data collection in November 2009. There will be a separate set of reports and tabulations for the New Orleans area. We will release these reports by September 2010.

17. Request to Not Display Expiration Date

The OMB number and expiration date are included on the AHS-26/66(L) and AHS-27(L) Advance Letters. Because the questionnaire is an automated instrument, the respondent will not see the OMB number and expiration date.

18. Exceptions to the Certificate

There are no exceptions.

B. Collection of Information Employing Statistical Methods

1. Universe and Respondent Selection

AHS-MS – New Orleans

The 2009 New Orleans metropolitan sample special survey will consist of approximately 6,176 sample addresses. The sample will consist of interviews from the New Orleans 2004 previous survey; new construction housing units representing housing units built in permit-issuing areas since the previous survey; housing units built in non-permit issuing areas since the previous survey; 2000 census manufactured/mobile homes; 2000 census special living units; 2000 census housing units; 2000 census housing units that replace current housing units due to confidentiality; and housing that were previously reduced from the current sample due to confidentiality reasons. See attached “2009 American Housing Survey New Orleans Metropolitan Sample Design and Weighting” for more detailed information.

Based On The 1990 Census Of Population And Housing

MS AREA	TOTAL HOUSING UNITS IN MS AREA	ESTIMATED HOUSING UNITS IN SAMPLE	APPROXIMATE RESPONSE RATE LAST ENUMERATION (PERCENT)
New Orleans, LA	524,056	6,176	89

3. Methods to Maximize Response

The Census Bureau expects the response rate to be between 87 and 90 percent on the AHS-N and the AHS-MS. If an occupant is reluctant to participate, the FR informs the regional office staff, who sends a follow-up letter explaining the survey in greater detail and urging the occupant's cooperation. A Census Bureau FR or supervisory FR will contact the occupant again.

4. Testing Procedures

The Census Bureau conducted a test of the interview forms and procedures in September 1983 and again in 1994 and 1995. Based on the results of the tests, HUD made modifications and changes in preparation for the 1984 through 2004 AHS-MS and the 1985 through 2007 AHS-N.

In preparation for the change to computer-assisted personal interviewing beginning with the 1997 survey, HUD and the Census Bureau staff reviewed the current survey questions and decided to test different versions of questions for rooms, heating equipment, and housing quality items to improve the quality of this information. We made changes to all these areas as a result of this research.

HUD and the Census Bureau conducted a major review of the survey questions in the summer of 2004 to review the data user suggestions received and identify areas where updates should be made to stay current with new housing conditions. The Center for Survey Methods Research (CSMR) at the Census Bureau tested different versions of questions for neighborhood quality, income, utility costs, and renter subsidies to improve the quality of this information. We made changes to all of these areas as a result of their research. In October 2005, we tested these changes in a live hot house test held in Pittsburgh, Pennsylvania.

5. Contacts for Statistical Aspects and Data Collection

HUD consulted the following individuals on the statistical data collection and analysis operation:

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Collection

Attachments