

**Supporting Statement for
Paperwork Reduction Act Information Collection Submissions
OMB No. 1084-0033
“Private Rental Survey”**

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the OMB Form 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

In each regional survey, the universe of potential rental properties does not include all rental properties in each region. Not all rental properties in a given community or region are eligible. Therefore, the potential rental market universe cannot be quantified, because for these purposes, eligible respondents includes only those rental properties in specific, primarily rural, communities that are: (1) most similar to that found in middle-income neighborhoods (e.g. housing next to a golf course or country club shall not be acceptable); (2) available on a year-round rental basis; (3) non-vacation/resort in nature and use; (4) where the monthly contract rental rate represents a fair market rental rate (no rent-reduction arrangements between landlord and tenant); and (5) have been rented at fair market rates within the previous 12 months, or have had their rental rates reconfirmed within the past 12 months, or are currently offered for rental. The contractor must make these determinations on a case-by-case basis.

If a particular sampled unit does not meet the contractual requirements, another rental comparable is selected instead. The contractor endeavors to meet the sample size requested in the sample plan, since they are compensated by the number of rental comparables they collect.

The universe of respondents – the affected public – includes property managers, realtors (business or other for-profit institutions), property owners and tenants (individuals or households). Because NBC does not collect the type of respondent on Forms OS-2000 or

OS-2001, we cannot accurately quantify which groups of the public are affected by the data collection. However, experience has shown that the large majority are property owners, managers or realtors (business or other for-profit institutions), perhaps 95%.

Since OS-2001 (Trailer Spaces) only collects the respondent address, there is no clear way to estimate which respondents were tenants and who were trailer park managers. However, experience has shown that the large majority are trailer park managers (employed by for-profit institutions), perhaps 95%.

2008	No. of Individual Respondents	No. of Annual Responses	Est. No. of Business (For-Profit) Responses	Est. No. of Individuals / Household Responses
OS-2000	1,776	3,521	3,345	176
OS-2001	205	208	198	10
Total	1,981	3,729	3,543	186

2009	No. of Individual Respondents	No. of Annual Responses	Est. No. of Business (For-Profit) Responses	Est. No. of Individuals / Household Responses
OS-2000	734	1,329	1,263	66
OS-2001	185	191	181	10
Total	919	1,520	1,444	76

2. Describe the procedures for the collection of information, including:

- **Statistical methodology for stratification and sample selection, estimation procedure, degree of accuracy needed for the purpose described in the justification, or unusual problems requiring specialized sampling procedures.**

The NBC designs its sampling plan based on the actual inventory of Federal housing. The sample size in each community is based on the number of federally-owned housing units located in or near that community, stratified by the appropriate mix of houses, apartments, mobile homes and trailer pads. The contractor selects the units to be sampled in each community according to the contract specifications. Due to the small size of many communities sampled, the contractor may sample all rental units in the community, and all available units may not meet the sample size requirements in the sample plan. Even if no rental units are found or surveyed, this is unlikely to bias the rental pattern observed in the region as a whole. Overall rental rates are calculated from the regional responses in totality; local economic factors are taken into consideration as independent variables. The specific methodology for data collection

and analyses is described in each Regional Rental Survey, available at <http://www.nbc.gov/supportservices/surveys.html>.

- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

There are 15 survey regions and each must be surveyed at least once every five years, per OMB A-45, Section 7(d)(1). Currently, each region is surveyed once every four years. Past experience has shown that less frequent collection of data does not keep up with actual market rents, and causes more frequent employee rents appeals. More frequent collection of data keeps up with actual market rents, but is too costly to the Government.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

The NBC's experienced contractors identify rental units from leads in newspaper listings and contacts with realtors. This method of sampling and collection has been used for nearly 30 years, so the parties are highly experienced and well-trained in dealing with non-response issues.

Rental unit managers and owners have generally been cooperative in supplying the information requested by our contractors. Non-response is rarely an issue in Regional Rental Market surveys. Even if no rental units are found or surveyed, this is unlikely to bias the rental pattern observed in the region as a whole. Rental units must conform to the general market conditions in their community and region, or they could not be successfully rented.

Gathering data using the OMB Circular A-45 methodology allows greater efficiency and accuracy over the standard appraisal method, because we have more data points for each individual assessment area than under the standard appraisal method.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The NBC Quarters Program's procedures and methods conform to OMB Circular A-45 (<http://www.whitehouse.gov/omb/circulars/a045/a045.aspx>) and have been used and refined since the early 1980s.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Doug Pokorney is the NBC Quarters Program Manager and statistician for this data collection activity, and he may be reached at 303-969-5050. Laura Walters (303-969-5696) is an alternate point of contact at the NBC regarding the analysis and statistical aspects of private rental market surveys.

Over the past several years, Delta-21 of Knoxville, Tennessee has performed the NBC contract for collection of rental market data. The principal point of contact is Nick Ingle, who may be reached at 865-482-5000.