

SUPPORTING STATEMENT

A. Justification

1. Necessity of Information Collection

We request clearance for the proposed questions to be used on the 2011 American Housing Survey (AHS). We will collect data between August 1 and December 9, 2011. Prior to 2011, the AHS was conducted by taking two separate samples, a national sample (AHS-N) and a metropolitan area sample (AHS-MS). In the period between 1985 and 2004, separate samples allowed AHS-MS to be conducted in even numbered years and AHS-N in odd-numbered years. A separate metropolitan sample also allowed metropolitan areas to be cut from sample at short notice due to budgetary reductions. In 2011, all data will be collected from a single national sample which will have concentrated sample sizes from 30 metropolitan areas. By doing this, we can more efficiently collect and process the data. We also add more data that can be used for national data analysis. The metropolitan data will increase the density of cases in metropolitan areas, allowing for identification of smaller subgroups or reduced standard errors for currently-produced estimates, whichever future research requires.

This request is a revision to the currently approved joint data collection request for AHS-N and AHS-MS under the single OMB Number 2528-0017.

The AHS sample 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; and the number and characteristics of housing vacancies, including separate data on units for rent or sale.

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. The 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 2011 data collection procedures and questionnaire content are identical to the 2009 survey with the following exceptions.

- 1) Two new modules have been added to the survey: Home Accessibility and Healthy Homes. These modules collect data on potential health and safety

hazards in the home and modifications made to the home to assist occupants living with disabilities. Additionally, the Mortgage module has new questions designed to more fully identify the types of mortgages respondents have and whether their mortgage payments have increased to the point of being difficult to afford. The new mortgage module will provide a better picture of current conditions in the mortgage markets, as well as, estimates of the number of users of exotic mortgage products. Please refer to the attached items booklet for the questions in these modules and the entire AHS questionnaire.

- 2) The following modules were deleted: Neighborhood Quality, Journey to Work, and Observation. The AHS is moving towards a strategy of rotating topical modules in order to minimize respondent burden and satisfy widening needs for data content. The rotating modules will provide more specialized types of housing data, albeit at the cost of lower frequency. As part of this strategy, we plan to institute a new module that includes content from the Neighborhood Quality, Journey to Work, and Observation modules in the 2013 survey. The 2013 survey will not include healthy homes or accessibility questions.

The following actions are being taken in the 2011 AHS in order to improve the quality of the sample.

- 1) Addition of Assisted Living Units: We will screen approximately 599 units for eligibility as assisted living units. Of those screened, we expect 90 new assisted living units to be introduced to the 2011 AHS. We expect these changes to allow analysis of more metropolitan areas, which will benefit HUD field offices and local governments. An assisted 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. Most are age-restricted communities but some serve the disabled of all ages. An assisted 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. When the original sample was drawn in 1985, assisted living units were not considered to be housing units, because their residents did not eat meals separately from residents of other units, a requirement for the housing unit classification at that time. These units had no chance of coming into sample between 1990 and 2000 due to sampling limitations.
- 2) Addition of Subsidized Housing Units: We will introduce 5,250 subsidized housing units in the 2011 AHS. The subsidized unit oversample is part of HUD's Transformation Initiative. It is being funded by the HUD Office of Public and Indian Housing in order to provide them with data on assisted units to better understand their client population. A subsidized housing unit is where the resident receives government rent assistance such as vouchers. A subsidized housing 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.

- 3) **Supplemental Sample of 30 Metropolitan Regions:** A supplemental sample of 120,000 units will be selected from 30 large metropolitan areas across the country, as designated by the HUD. We are increasing the number of metropolitan areas in order to satisfy a Congressional mandate to produce a survey substantially the same as the 1985 AHS. The 2011 AHS will not have a separate Metropolitan Sample component as in the past, but rather the supplemental sample will be combined with existing National cases in those areas to provide metropolitan estimates. The U.S. Census Bureau worked with the HUD to modify the areas in the concentrated sample to stay consistent with the Office of Management and Budget's 2003 Metro Area Definitions. As a result, new counties have been added to the sample and old counties no longer in the definition have been dropped. The 30 metropolitan areas to be interviewed for the 2011 AHS have all been interviewed in previous AHS-MS surveys from 1998 to 2004.

As a result of the addition of these units, the 2011 AHS will contain 27,400 new housing units. Approximately 15 percent of the total sample will consist of new units where the 2009 sample contained about 10 percent new units. 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. Reinterview questions ask respondent whether they recall general details from the original interview. The 2011 reinterview instrument will contain five questions, an increase over the three questions asked in 2009, but it is not anticipated that the increase in length will affect respondent burden. 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/AHSref.pdf>

The matrix below outlines the seven 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	Housing Mobility	Housing Costs	Household Characteristics	Income
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.
 "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.

The HUD needs AHS data on building and unit characteristics, prices, and housing and income characteristics for two important 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 the HUD programs to improve efficiency and effectiveness. The 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 the 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 plays an important role in enabling the Federal Government to fulfill its requirement to monitor the lending activities of the government-sponsored enterprises (GSEs) Fannie Mae and Freddie Mac. The GSEs are required to meet certain goals with respect to minorities, low-income households, and underserved areas. Tabulations from the AHS are used to establish the composition of the primary mortgage market with respect to race, income, ethnicity, and first-time buyer status. These tabulations are compared with GSE-supplied data on the composition of their lending activities to measure the extent to which these corporations are meeting their goals.

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 the HUD's market sizing models for the housing goals.

HUD's field offices find the AHS an important source of information to update data relating to housing assistance needs of individual localities. The HUD field office economists also use AHS data to evaluate market feasibility of assisted-housing proposals

Data from the survey are the major source of estimates of the space-rental value of housing (a component of personal consumption expenditures) and of the rental income of persons (a component of both personal income and national income). The Bureau of Economic Analysis (BEA) uses the AHS data in preparing metropolitan income and product accounts. The specific data that the BEA uses are those defining farm or nonfarm location, type of housing unit, occupancy status, tenure of the occupant, and the expenditures related to housing (rent, utilities, mortgage, and so on). Another use of the AHS data is to evaluate the housing program benefits reported on the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). The Energy Information Administration of the Department of Energy issues an annual report "Annual Energy Review" using the heating fuel data collected in AHS.

New data are being collected in the 2011 survey to identify accessibility modifications to homes of people with disabilities, and to identify equipment and characteristics of homes that can impact the health and safety of its occupants. New mortgage questions are included to collect more complete information on the types of mortgages respondents have in order to keep up with the recent changes in mortgage products

available over the past decade. We will collect this data in the following three modules.

1. The Home Accessibility module was created as a rotating topical module that complements the data collected by the Disability module, which was introduced in 2009.

The collection of disability data helps to accomplish goals detailed in HUD's Strategic Plan. Goal 2 is "Meet the Need for Quality Affordable Rental Homes"

(http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_4306.pdf) .

Subgoal 2B is "Expand the supply of affordable rental homes where they are most needed." Part of this need is for housing that is accessible by the disabled and the elderly. In order to identify these needs, the AHS is collecting more information about the state of the current housing stock.

Goal 3 is "Utilize Housing as a Platform for Improving Quality of Life"

(http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_4442.pdf) . In

particular, Subgoal 3B: "Utilize HUD assistance to improve health outcomes" and Subgoal 3D: "Utilize HUD assistance to improve housing stability through supportive services for vulnerable populations, including the elderly, people with disabilities, homeless people, and those individuals and families at risk of becoming homeless," require data on the needs of vulnerable populations and the extent to which the current housing stock is meeting those needs.

The new Home Accessibility questions collect data on modifications made to homes that affect the accessibility of housing features to the disabled and the elderly. The questions were adapted from a 1995 AHS supplement, with input from Center for Disease Control (CDC) representatives (via OMB). We expect these data to inform HUD's evaluation of the state of housing needs for the disabled and elderly.

We expect that the data will be used by outside agencies (such as the Remodeling Futures project of the Joint Center for Housing Studies at Harvard, the National Association of Home Builders, AARP, and advocates for the disabled) to judge the extent of the market for remodeling and new construction to service this segment of the population.

2. The overall goal of the Healthy Homes module is to explore the use of AHS as a cost effective means for improving national surveillance on housing characteristics and conditions that can adversely impact occupant health. For example, data will be collected on the presence of important asthma triggers (i.e., cockroaches, mice, mold) and key injury hazards. Questions on the presence of an occupant with asthma and the need for recent emergency

treatment will allow for an assessment of the association between exposure proxies and presence and severity of occupant asthma. The module was developed through close coordination with environmental health experts from the CDC's National Center for Environmental Health. The questions were suggested by HUD's Office of Healthy Homes. Some of them came from previous CDC surveys. The data from this module will allow for a more accurate identification of housing with health and safety hazards. The AHS is the most appropriate vehicle for collecting these data because it is a random sample of U.S. housing and has an established infrastructure for implementation and reporting. There is no other regularly administered survey that routinely captures these data.

3. The AHS mortgage module was not designed to capture many common practices in contemporary mortgage markets. Mortgage products now have features previously unknown, both in terms of the information that borrowers must supply (for example no-doc and low-doc loans) and in payment plans (interest-only, payment-optional, subprime, etc.).

Goal 1 of HUD's Strategic Plan is "Strengthen the Nation's Housing Market to Bolster the Economy and Protect Consumers" (http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_4441.pdf). The four subgoals all are related to housing finance:

- a. Subgoal 1A: Stem the foreclosure crisis.
- b. Subgoal 1B: Protect and educate consumers when they buy, refinance, or rent a home.
- c. Subgoal 1C: Create financially sustainable homeownership opportunities.
- d. Subgoal 1D: Establish an accountable and sustainable housing finance system.

HUD needs data to accomplish these goals, as well as, to know the extent of the foreclosure crisis and the kinds of mortgage products that are most prevalent and most associated with financial distress. The revised AHS mortgage module is designed to provide these data. It asks new questions about how households choose their mortgage lender, the terms of their mortgages, and their payment plans. These data can be correlated with the housing and demographic data that AHS already collects to identify the characteristics of mortgages held by households most at risk of foreclosure (Subgoal 1A). The data can guide Subgoal 1B by allowing HUD programs to concentrate on the mortgage features that consumers most need to be warned about. Mortgage features not associated with distress can be used to achieve Subgoal 1C. As the only source of mortgage data about the entire owner-occupied housing stock, AHS provides vital information about the extent of the market, which is needed for accomplishing Subgoal 1D.

The new questions were based on a HUD-commissioned report by Econometrica, Inc, "The American Housing Survey and Non-Traditional Mortgage Products," and then modified after discussion among Census Bureau and HUD subject-matter experts. Additional changes were adapted from another Econometrica report, "Streamlining the American Housing Survey."

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 same survey instrument is used for all interviews. However, the instrument code includes skip patterns and makes use of dependent interviewing techniques, 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 Web site. The Census Bureau has a Web site 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 the 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, and moving. 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. Less frequent enumerations would impair the government'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. Consultations Outside the Agency

Attached is a copy of the *Federal Register Notice* required by 5 CFR 1320.8(d).

Two comments were received. One, from an email address identified as "Jean Public," suggested that the survey be delayed until after the 2010 decennial census data had been evaluated. The other, a letter from the National Association of Home Builders, strongly supported the survey.

The HUD discussed plans for the 2011 AHS survey with the following people:

David S. Johnson
Chief, Housing and Household Economic Statistics Division
U.S. Census Bureau
301-763-6443

Ruth Ann Killion
Chief, Demographic Statistical Methods Division
U.S. Census Bureau
301-763-2048

Cheryl R. Landman
Chief, Demographic Surveys Division
U.S. Census Bureau
301-763-3773

During the development of the 1984 AHS-MS questionnaires, which were precursors to the 2011 AHS questionnaire, 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, the BEA raised a series of suggested modifications, some of which would result in improvements to the BEA's estimates and others that were suggested to improve the clarity and consistency of the forms. Further discussions involving representatives from the BEA and the Census Bureau resulted in agreements to make several modifications to the core questionnaire.

The 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 the HUD used their Web site 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.

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 will receive the AHS-27 letter. The new incoming units 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 40 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 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 the 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 the HUD is subject to prior approval by the Census Bureau's Data Stewardship Executive Policy Committee upon assurance that the 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 the respondent burden hours to be 123,088. Please refer to the table below for more detailed information.

Interview Type		Total Addresses	Respondent Burden Combined	
(A) Name	(B) Definition	(C) AHS	(D) Avg Min Per Intv	(E) Total Hours
Occupied	Sampled addresses with one or more residents	138,700	49	113,272
Vacant	Sampled addresses intended for occupancy but currently without residents	22,800	20	7,600
Noninterview	Sampled addresses not intended for occupancy or occupants refuse to participate	28,500	0	0
Total Addresses For Data Collection (DC)		190,000		
Reinterview	Second quality control check interview at 7 percent of the above sampled addresses	13,300	10	2,217
Total DC and Reinterview Addresses/Burden Hours		203,300		123,088
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

The HUD estimates the annual costs to the government for the AHS program to be about \$33 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 sample.

The annual costs for the 2011 survey have increased due primarily to the significant increase in sample size associated with adding 30 metropolitan areas to the National sample. However, combining the supplemental sample with the National sample does save costs compared to interviewing separate National and Metropolitan samples as was done previously, as fewer field representatives are required for data collection.

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. We will release a metro data report for each of the thirty areas but will not produce separate micro data PUFs.

15. Reason for Change in Burden

This is a revision of a currently approved collection. The National sample is significantly larger than it was in 2009. There is no Metro sample.

The respondent burden has changed in the following ways.

- The new Healthy Homes module contains additional questions that add about 6 minutes to the length of the interview.
- The new Home Accessibility module contains additional questions that add about 9 minutes to the length of the interview.
- The additional questions in the redesigned Mortgage module and other modules add about 13 minutes to the length of interview.
- The removal of the Journey to Work and Neighborhood Quality modules decreases the length of the interview by about 18 minutes.

16. Project Schedule

The Census Bureau has scheduled the 2011 field enumeration for the AHS survey to begin August 1 and continue through December 9. The reinterview data collection will begin August 8 and conclude on December 23.

The projected release date of the first public use file is August 31, 2012. Previous surveys released National data in January and Metropolitan data in May following a September end of data collection. But the change to a significantly larger National sample with no Metro sample demands that all data be processed together. When processing the data, the Census Bureau usually implements basic data edits to ensure consistency. In some cases, statistical models are used to allocate for missing values,

such as values for income, utility cost, etc. Allocated values can be identified by analysts with the help of variables that are included in the data set that tag such edits. We also create new variables by collapsing or combining questions in the survey. In the future, we expect to reduce time slightly 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 the HUD. The summary reports will provide selected statistics at the national level involved. The Department of Commerce or the HUD may release other publications. The projected timeline for the release of Internet tables and publications is November 11, 2012 through March 31, 2013.

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

The 2011 AHS sample will consist of about 190,000 sample units. The sample is comprised of three components.

- 64,750 sample units selected primarily from the 1980 census sample files by variables, such as owner-occupied housing units, renter occupied housing units, vacant units for rent, and mobile homes. This sample includes 61,200 returning and 3,350 new housing units.
- 5,250 subsidized housing units selected from the 2009 Tenant Rental Assistance Certification System (TRACS) and the 2009 Public and Indian Housing Information Center (PIC) files provided by HUD.
- 120,000 large metro area supplemental sample units selected from areas interviewed in previous AHS-MS surveys between 1998 and 2004.

We designed the survey using the following reliability requirement: A two-year change of 10% in the median monthly costs for 5 % subgroups will have a standard error of 5%.

Please refer to the attached 2011 AHS Sample Design and Weighting document for detailed statistical methodology.

2. Procedures for Collecting Information

We will collect the data primarily through telephone interviews. In previous AHS surveys, telephone interviews were reserved for returning, occupied housing units with at least one household member remaining from the previous survey who had given permission to conduct further interviews by telephone. Units that were new to the sample or with respondents that preferred not to be interviewed via telephone received personal visits. However, due to the large increase of new units in the 2011 sample, it is not feasible to perform personal visits at all of these units. The 2011 policy is that all units will initially be contacted by telephone. Respondents who prefer not to be interviewed via phone will receive personal visits.

3. Methods to Maximize Response

Based on the 91 percent weighted response rate of the 2009 AHS-N (89 percent unweighed), the Census Bureau expects the 2011 AHS response rate to be between 87 and 90 percent. 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, the HUD made modifications and changes in preparation for the 1984 through 2009 AHS-MS and the 1985 through 2009 AHS-N.

In preparation for the change to computer-assisted personal interviewing beginning with the 1997 survey, the HUD and the Census Bureau staff made changes to questions for rooms, heating equipment, and housing quality items to improve the quality of this information.

In 2004, the HUD and the Census Bureau conducted a major review of the survey questions for neighborhood quality, income, utility costs, and renter subsidies, making changes to each to improve the quality of this information. In October 2004, we tested these changes in a live hot house test held in Pittsburgh, Pennsylvania.

In 2010, questions in the new Healthy Homes and Home Accessibility modules and the updated Mortgage module were cognitively tested by the Statistical Research Division (SRD) at the Census Bureau before implementation into the 2011 questionnaire. For the Healthy Homes and Home Accessibility modules, the Census Bureau, HUD, and the CDC reviewed and discussed all of SRD's recommendations. For questions unrelated to Mortgage, the Census Bureau and HUD reviewed and discussed all of SRD's recommendations and elected to follow most the recommendations. In the cases where SRD could not make a definitive recommendation, we came to a consensus.

With regard to the Mortgage questions, we determined that more work needed to be done on the module, so we reverted to the 2009 AHS version and flow of questions where the 2011 version fell short.

a. Cognitive Testing of the Healthy Homes Module

Thirty-four questions were tested during the first round of cognitive testing. Following a review and discussion of the first round cognitive testing results between the Census Bureau, HUD, and the CDC, HUD modified the answer set for six questions as follows:

- i. **MOLD:** We inserted an additional answer category '6.) Other Room Not Listed'.

- ii. **OUTLET/CHEMSTOR/STAIRRL/STAIRLGT/STAIRGAT:** We revised these questions such that the interviewer would read the answer categories ‘all, some or none’.

Thirty-four questions, including six with revised answer sets, were tested during the second round of cognitive testing. Following a review and discussion of the second round cognitive testing results between the Census Bureau, HUD, and the CDC, HUD removed five questions from the module because they were deemed confusing to respondents, considered too vague, or because of insufficient data. The five questions removed from the module included: UND18INJ, HHSAFE, H2OT, H2HRT, and H2MED.

Of the remaining 29 questions, HUD made revisions to 12 as follows:

- i. **MOLD:** HUD split this question into two (MOLD/MLDROOM). The original question was found to be too wordy.
- ii. **MUST/SECSMK:** HUD changed one answer category in both questions from ‘a few times a year’ to ‘a few times’. The word ‘tobacco’ was added to SECSMK to clarify that HUD is interested only in tobacco smoke.
- iii. **H2OHT:** HUD altered the question to ask if anyone has checked the water temperature, not just whether the respondent has.
- iv. **POOLACC:** HUD added optional text to help clarify for respondents in multi-unit buildings that we are interested only in swimming pools on the building’s property.
- v. **STAIRS/STAIRMIS:** In STAIRS, HUD added text to help clarify for respondents in multi-unit buildings that we are interested only in stairs inside their unit and not inside the building. Similarly, HUD revised STAIRMIS to reinforce to respondents that HUD is interested only in stairs inside the home.
- vi. **HLTH/Asthma Series:** HUD moved this series of questions from the beginning of the Disabilities module to the end of the Healthy Homes module. While the questions are technically in the Healthy Homes module, their orientation in the instrument is essentially the same, since the Disabilities module immediately follows the Healthy Homes module. This change will allow HUD to easily rotate the series out of the instrument along with the rest of the Healthy Homes module as originally planned. HUD altered HLTH to ask about the health of the head of household and not the respondent. ASTHMA was revised to clarify that HUD is interested only in children who have lived in the home.

b. Cognitive Testing of the Home Accessibility Module

Fifty-nine questions were tested during the first round of cognitive testing. Following a review and discussion of the first round cognitive testing results between Census, HUD, and the CDC, HUD added an introductory statement to the series of questions on wheelchair accessibility.

The same fifty-nine questions were tested during the second round of cognitive testing. Following a review and discussion of the results of the second round cognitive testing between Census and HUD, HUD removed four questions from the module because the intent of the questions was unclear. The four questions removed from the module included: HWRKPROB, HWRKWHO, AUIDBLE, and AUDIBLEYES.

Of the remaining 55 questions, HUD made revisions to seven questions as follows:

- i. **SPLEDWHAT:** For clarification, HUD added the text ‘because of a condition other than a temporary injury’.
- ii. **ENTBTH:** HUD added the term ‘full’ to the text to clarify that we are not interested in half bathrooms.
- iii. **HIOUTLET/LSWITCH/LOWCAB/CLCTRL/CTRWCHAIR:** HUD combined these separate questions into one question (WCACC) where the respondent can give multiple answers. The text of the question was revised to accomplish this and a probe was added to help the respondent visualize a wheelchair.

c. **Cognitive Testing of the Mortgage Module**

The same 77 questions were tested during the first and second rounds of cognitive testing. No changes were made to the questions between the first and second rounds. Following a review and discussion of the second round cognitive testing results between the Census Bureau and HUD, HUD made numerous changes to the module.

The following questions and/or answer sets were modified, but did not result in a net change in the number of questions:

- i. **REGMOR:** HUD changed this question in name only. It is now called NUMMORTG to distinguish it from the REGMOR question in previous surveys.
- ii. **YRMOR/MNMOR:** HUD altered this question to include refinanced mortgages.
- iii. **REFNREAS:** HUD removed the term ‘permanent’ from the second answer category as it was found to be problematic. HUD inserted an additional answer category, ‘4.) To increase the payment period for the mortgage’, which was used in the 2009 AHS.
- iv. **PERUS1:** To emphasize the phrase ‘purchase of this home’, HUD removed the phrase ‘or additions, improvements or repairs to this home’.
- v. **PMTCHYR:** HUD altered the text of this question to simply ask whether the payment has changed, not whether it has increased or decreased, since both are possible.
- vi. **WHYPMTCH:** HUD modified the answer list. Respondents could not follow it.

- vii. **PMTINC/PMTCHAMT:** HUD altered these questions to address infant mortgages. From PMTINC, HUD removed the phrase ‘as a result of these changes’.
- viii. **RULEINTRO:** HUD altered this introductory statement, by removing the phrase ‘the payment you make on your mortgage and how much of that regular payment is charged to principal, interest, and other charges’. The original text was found to be too wordy.
- ix. **AMRTZ:** HUD changed the phrase ‘how much longer’ to ‘how many years’.
- x. **BANK:** HUD altered this question to clarify the terms ‘bank’ and ‘organization’. Respondents were confused by them.
- xi. **SELL:** HUD altered the question slightly for a smoother transition from the previous question.
- xii. **BALLNAMT:** HUD removed the word ‘balloon’ from the text of the question.

The following question was removed, resulting in a net loss of one question:

- xiii. **FHVAMT:** HUD removed this question

The following questions were split into two, resulting in a net addition of three questions:

- xiv. **MGREAS:** HUD split this question into two (MGREAS1/MGREAS2). The original question was found to be too wordy and respondents had trouble fitting their response into one of the answer categories.
- xv. **MGTYPE:** HUD split this question into two (MGTYPE/HELUMC). HUD also added an introductory statement to MGTYPE.
- xvi. **PMTPARTS:** HUD split this question into two (PMTPARTS/PMIPMT). The original answer list included terms unfamiliar to respondents. HUD also altered PMTPARTS to refer the respondent to their mortgage, not their mortgage statement.

The following questions were added and/or replaced existing questions, resulting in a net addition of 14 questions:

- xvii. **MORGTTYPE/MORGCHK Series:** Since there were too many answer categories and wordy definitions, HUD replaced 15 original questions with 4 questions from the 2009 AHS instrument along with wording changes provided by HUD (VARY/HOVVARY/NEWMOR/HYBARM).
- xviii. **HYBARMYR/AMRTZ2/AMRTZ3:** HUD added these questions to get more information on hybrid adjustable rate, balloon, and assumed mortgages. They mimic the wording of similar questions.

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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Attachments