

**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 a revision of a currently approved collection for Form C-411, “Survey of Residential Building or Zoning Permit Systems.” 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 principal economic indicators New Residential Construction and New Home Sales. Data from the BPS and SOC are also used by the Bureau of Economic Analysis (BEA) in the calculation of estimates of the Residential Fixed Investment portion of the Nation’s Gross Domestic Product (GDP). In addition, data from the BPS are used by the Census Bureau in the calculation of annual population estimates; these estimates are widely used by government agencies to allocate funding and other resources to local governments.

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.

We have redesigned the form to create three versions:

- C-411(V) for verification of coverage for jurisdictions with existing permit systems (Attachment A)
- C-411(M) for municipalities where a new permit system may have been established (Attachment B)
- C-411(C) for counties where new permit systems may have been established (Attachment C)

This will clarify the instructions and the information requested in each of these situations but will not affect respondent burden.

## 2. **Needs and Uses**

The appropriate form is sent to a jurisdiction 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 the Census Bureau's Geography Division which keeps abreast of changes in corporate status. Responses typically approach 85 percent.

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.

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.

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**

We published a notice in the Federal Register (Vol. 76, No. 69, Pages 19975 and 19976) on April 11, 2011, inviting public comments on our plans to submit this request.

We received a written comment from one individual during the 60-day comment period generally opposing the collection. The Census Bureau needs these data to ensure that we can provide accurate, current statistics on residential construction, e.g., housing starts and housing sales, that are needed by economic policymakers to monitor the large and dynamic construction sector of the economy.

**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 D).

**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 \$12,170 based on an average hourly salary of \$24.34 for local government employees. This estimate was taken from the Census Bureau's Annual Survey of Government Employment for 2009.

**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 2011 of the Building Permits Program, of which this questionnaire is a part, is \$2,512,000, 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.