

## SUPPORTING STATEMENT

### A. Justification

#### 1. Necessity of Information Collection

We request clearance for the proposed questions to be used on the 2013 American Housing Survey (AHS). We will collect data between May 1 and September 6, 2013. This request is a revision to the currently approved data collection request for the AHS under OMB Number 2528-0017.

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.

Starting with the 2011 AHS, the AHS-N sample was combined with metropolitan oversamples from 29 metropolitan areas (formerly known as AHS-MS) to create a single national sample. This sample design change produced at least three benefits. First, it improved the efficiency of data collection and processing, thereby reducing 2011 AHS survey costs relative to previous years. Second, the statistical precision of national estimates was improved through the use of the entire sample. Third, for some metropolitan areas, combining the AHS-N cases that were part of the metropolitan areas with the metropolitan oversample led to an increase the density of cases in metropolitan areas, thereby reducing the number of new cases necessary to achieve desired statistical precision for metropolitan area estimates.

Starting in 2009, the AHS questions were classified into “core” modules and “rotating topical” modules in order to minimize respondent burden and satisfy widening needs for data content. Questions in the core modules are asked in each survey and typically undergo only minor revisions between surveys. Questions in the rotating topical modules are asked on a rotating basis.

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 *Worst Case Needs* reports to Congress. HUD was directed to prepare this report series by U.S. Senate Appropriations Committee in 1990 (Committee Report to accompany H.R. 5158, The VA-HUD Appropriations Act for FY 1991 (S. Rpt. 101-474)). 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 2013 data collection procedures and questionnaire content are identical to the 2011 survey with the following exceptions:

- a. Removed Two Rotating Topical Modules from the 2011 AHS: To continue the strategy of rotating topical modules in order to minimize respondent burden and satisfy widening needs for data content, the Healthy Homes and Home Accessibility modules, which were included in the 2011 survey, will not be included in the 2013 survey.
- b. Introduce Four New Rotating Topical Modules: Four new rotating topical modules have been added to the survey: Public Transportation and Pedestrian Accessibility, Disaster Planning, Doubled-Up Households, and Neighborhood Social Capital. These modules collect data on people who had to temporarily move in with other households, neighborhood conditions, ability to travel via public transportation, bicycling, or walking, social cohesion and trust, and emergency preparedness. Please refer to the attached items booklet for the questions in these modules and the entire AHS questionnaire.
- c. Reinstated a Revised Neighborhood Observation Topical Module: Some content from both the 2009 AHS Neighborhood Quality and Observation topical modules were combined and reinstated as part of the 2013 Neighborhood Observation topical module. The revised topical module includes minor adjustments to a small number of questions relating to food accessibility. In addition, several questions were dropped from the 2009 versions of each module.
- d. Sample Split for Family Relationships Questions Experiment: The survey sample will be randomly split into two groups to conduct an experiment using revised and new family relationships questions. A random half sample (the control group) will be administered the current AHS relationship question and marital status question. The other half of the sample (the test group) will receive a revised relationship question, a revised marital status question, and two new questions relating to cohabitation and domestic partnerships. The revised relationship question will have answer categories that distinguish whether husband/wives and unmarried partners are opposite or same-sex couples. The two new questions will help determine if cohabiting couples are part of a domestic partnership or civil union.
- e. Sample Split for Rotating Topical Modules: The aforementioned split of the survey sample will be used maximize the number of rotating topical modules that can be included in the 2013 AHS. The aforementioned control group will receive the Disaster Planning and Public Transportation and Pedestrian Accessibility modules. The aforementioned test group will receive the Neighborhood Observation and Neighborhood Social Capital modules. The entire sample will be asked the Doubling Up module, if eligible.

The following actions are being taken in the 2013 AHS in order to improve the quality of the sample.

- a. Addition of Assisted Living Units: We will continue to interview the approximately 450 assisted living units introduced to the sample in 2005. 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.
- b. Addition of Subsidized Housing Units: We will continue interviewing the 5,100 subsidized housing units introduced in the 2011 AHS. In 2011, this count was 5,250; around 150 cases were identified as Type C Noninterviews and were excluded from the 2013 sample counts. 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.
- c. Supplemental Oversample of 25 Metropolitan Areas: In order to satisfy a Congressional mandate to produce a survey substantially the same as the 1985 AHS, the 2013 AHS will include a supplemental oversample of 25 large metropolitan areas (approximately 98,800 units), including eight metropolitan areas that have never been part of the current AHS sample. In 2011, the supplemental oversample included 29 large metropolitan areas. The U.S. Census Bureau worked with 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 of the addition of these units, the 2013 AHS will contain 36,500 new housing units. Approximately 20 percent of the total sample will consist of new units where the 2011 sample contained about 15 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 2013 reinterview instrument will contain seven questions. However, like in 2011, each respondent will only be asked five questions. While three of the five questions will be the same for each reinterview respondent, due to the split sample in the original interview, two of the reinterview questions will be

different for respondents in each of the two samples. We included in this clearance the cost and respondent burden estimates for the reinterview.

## 2. Needs and Uses

Both HUD and outside entities use the core modules of the AHS extensively. The core modules capture information about building and unit characteristics, housing quality, fuel and electricity costs, resident mobility and recent movers, rent and mortgage expenses, household demographic characteristics, income, and repairs and remodeling frequency and expenses. The following subsections describe the internal and external uses of the core modules and expected uses of the rotating topical modules.

### a. HUD's Internal Needs for the Core Modules

HUD has numerous needs for the AHS to support Congressional reporting requirements, programmatic needs, and ongoing research. The needs include, but are not limited to:

1. Worst Case Housing Needs: Congress requires HUD to produce the Worst Case Housing Needs report every two years. This report is based almost entirely on the AHS.
2. Worst Case Housing Needs of People with Disabilities: HUD produces a supplemental report to the Worst Case Housing Needs report providing national estimates and information on the critical housing problems that confront low income renting families that include people with disabilities.
3. Characteristics of HUD Assisted Renters and Their Units: HUD produces a report detailing the housing conditions of HUD-assisted renters. This report is based entirely on the AHS.
4. Housing Program Monitoring: AHS data is used to evaluate, monitor, and design the HUD programs to improve efficiency and effectiveness. From a HUD policy perspective, the AHS data have proved 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.
5. National Housing Market Program of Research: HUD PD&R continuously monitors the state of the nation's housing market. The AHS contributes to this effort by providing estimates of vacancy, financing types, homeowner equity, and housing values, to name a few.

6. Regional and Local Housing Market Research: HUD PD&R use the AHS data as one source of data for creating Comprehensive Housing Market Analyses and other local housing market intelligence reports. These reports help HUD field economists evaluate feasibility and market impacts of proposed multifamily assisted housing project investments.
7. Affordable Housing Program of Research: HUD PD&R uses the AHS to conduct research on the number of affordable rental units in the housing stock and the degree to which rents are affordable to low- and moderate-income families and to very-low-income families.
8. Housing and Demographics Program of Research: HUD PD&R uses the AHS to conduct research on demographic distributions by types of housing units. Of particular interest are housing choices by low-income female householders, minorities, first-time home buyers, the elderly, and households nearing retirement.

b. Core Modules Uses External to HUD

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 Web site can be found at:

<http://www.census.gov/housing/ahs/publications/reports.html>.

Data from the AHS is 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.

Data from the AHS are the primary input into Harvard's Joint Center for Housing Studies estimate of the size of the remodeling market.

c. Rotating Module Needs and Potential Uses

New data are being collected in the 2013 survey on people who had to temporarily move in with other households, neighborhood conditions, ability to travel via public transportation, bicycling, or walking, emergency preparedness, and social cohesion and trust. We will collect this data in the following five modules.

1. Public Transportation and Pedestrian Accessibility: The Public Transportation and Pedestrian Accessibility module was created as a rotating topical module to collect data on how people in the household get around by using public transportation, walking, or bicycling. There are questions that collect data about the household use of these means of travel as well as the ability to reach various types of amenities by utilizing these methods.

The collection of public transportation data helps to accomplish goals detailed in HUD's Strategic Plan. Goal 3 is "Utilize Housing as a Platform for Improving Quality of Life." Access to public transportation is related to these subgoals:

- Subgoal 3C: Utilize HUD assistance to increase economic security and self-sufficiency.
- 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.
- Subgoal 3E: Utilize HUD assistance to improve public safety.

Goal 4 is "Build Inclusive and Sustainable Communities Free From Discrimination." In particular, Subgoal 4A, "Catalyze economic development and job creation, while enhancing and preserving community assets" requires data on local economic opportunities, including how people travel to their places of work. Also, Subgoal 4B, "Promote energy-efficient buildings and location-efficient communities that are healthy, affordable, and diverse," requires data on transportation networks.

We expect that the data will be used by outside agencies interested in transit-centered development, such as Reconnecting America, Strategic Economics, and the Center for Neighborhood technology.

2. Neighborhood Observation: The Neighborhood Observation module was created as a rotating topical module that reinstates questions from the 2009 AHS Observation module and Neighborhood Quality module. It collects data on features of the unit's neighborhood, such as roadways, nearby buildings, and geographical features. There are also questions about the conditions of features such as sidewalks, roads, and buildings.

The Neighborhood Observation module will provide data useful for HUD's strategic goals 3 and 4, as described in the previous section.

Several groups outside HUD have made use of Neighborhood

3. Disaster Planning: The Disaster Planning module was created as a rotating topical module that collects data on how prepared a household is for an emergency situation or disaster such as a fire, flood, or earthquake. This module includes questions about whether the household has emergency supplies such as water, food, or a generator. There are questions about whether a household would have the financial means to relocate during an evacuation, where they would stay, and whether they have enough reliable vehicles to carry all household members, pets, and supplies.

This module is closely related to HUD Subgoal 4D, "Facilitate disaster preparedness, recovery, and resiliency." It provides HUD and local planners with information that connects household emergency plans with their housing, demographic, and income characteristics.

HUD's Office of Disaster Preparedness will be able to utilize the data to access disaster preparedness for HUD-assisted households. HUD expects that the National Disaster Housing Task Force (NDHTF) members will use the data, as will the local planning agencies in the supplemental metropolitan areas. Interest in this module was expressed by the Mid-America Regional Council, the South Florida Regional Planning Council, Reconnecting America, the City of Des Moines, the National Association of Home Builders, and the Jacob France Institute of the University of Baltimore.

4. Doubled-Up Households: The Doubled-Up Households module was created as a rotating topical module that collects data on people who had to temporarily move in with other households in the last year. These questions collect data on why people left their previous homes to move in with other households, and whether they moved in with that household due to lack of financial means or other support. It also asks about where people would stay if they left the household.

This module is related to HUD's Strategic Goal 2, "Meet the Need for Quality Affordable Rental Homes." In particular, Subgoal 2A is "End homelessness and substantially reduce the number of families and individuals with severe housing needs." Doubling up is widely seen as a precursor to homelessness.

HUD expects The Department of Education to be interested in the data produced by this module. Children in temporary doubled-up conditions are considered homeless for the purposes of education policy, and efforts

are made to ensure that these children attend the same schools as their housing situation changes. The United State Interagency Council on Homelessness and the National Alliance to End Homelessness Research Institute each has expressed strong interest in the findings from this module.

5. Neighborhood Social Capital: Neighborhood social capital is a term that describes the ways in which communities are organized. HUD is interested in the issue of neighborhood social capital and its impact on the housing choices of tenants who are receiving housing assistance from HUD. The Neighborhood Social Capital module was created as a rotating topical module that collects data on shared expectations for social control, social cohesion, and trust within neighborhoods, and neighborhood organizational involvement.

The module will provide data related to these HUD strategic subgoals:

- Subgoal 3E: Utilize HUD assistance to improve public safety.
- Subgoal 4C: Ensure open, diverse, and equitable communities.
- Subgoal 4E: Build the capacity of local, state, and regional public and private organizations.

A community of neighborhood social capital researchers that have expressed a strong interesting in the findings of this module, including: Robert Sampson (Harvard University) and Cathy Haggerty and Michele Zimowski (NORC at the University of Chicago).

Information quality assessment 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 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 via a Blaise CAPI instrument. 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 will not have to be asked in future enumerations to decrease respondent burden for households in sample.



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. The Census Bureau concluded from the results that the technology was 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 indicated 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.

b. Data Dissemination

HUD currently makes summary and micro data collected by the AHS available to the public on their Internet Web site at:

<http://www.huduser.org/portal/datasets/ahs.html>

The Census Bureau has a Web site that complements HUD's. The Census Bureau's Website contains an extensive set of summary tables for the users' convenience. The Census Bureau will also make these data available in printed publications. The Census Web site can be found at:

<http://www.census.gov/housing/ahs/>

Starting in 2013, the Census Bureau will also make the 2011 AHS and future AHS summary data available on the American Fact Finder Web site at:

<http://factfinder2.census.gov>

#### **4. Efforts to Identify Duplication**

a. Duplication in the Core Modules

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 detailed information available from the AHS. The CES collects

housing cost 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 worst case housing needs.

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 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 affect 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.

b. Duplication in the Rotating Topical Modules

HUD undertook considerable effort to determine if the rotating topical modules would be duplicative of existing surveys. HUD's conclusions are below.

1. Public Transportation and Pedestrian Accessibility: In developing this module, HUD reviewed three other similar sources of survey data on public transportation use:

- The commuting questions in the ACS
- The 2002 National Survey of Pedestrian and Bicyclist Attitudes and Behaviors (NSPBAB)
- The 2009 National Household Travel Survey (NHTS) published by the Bureau of Transportation Statistics
- "A Profile of Public Transportation Passenger Demographics and Travel Characteristics Reported in Onboard Surveys" published by the American Public Transportation Association in 2007.

HUD's questions were identical or substantially similar to the questions in the 2002 NSPBAB and the 2009 NHTS. However, neither of these surveys collected the detailed household information necessary to make inferences about HUD-assisted households. In addition, the sample in the 2009 NHTS did not include nearly as many metropolitan area oversamples as the 2013 AHS will include. Therefore, while there is duplication in content, the 2013 AHS will provide a much larger sample and permit cross-tabulations by socioeconomic groups of interest to HUD.

2. Neighborhood Observation: The questions in the Neighborhood Observation module are taken mostly verbatim from questions that had been in the Neighborhood Quality module and Observations module up until 2009. To the best of HUD's knowledge, these questions are not asked in any other federal surveys.
3. Disaster Planning: Much of the content is based on the FEMA guidelines for disaster preparedness, <http://www.fema.gov/plan-prepare-mitigate>. While the content of the Disaster Planning modules is very similar to FEMA guidelines and other disaster preparedness surveys, to the best of HUD's knowledge, no other survey has attempted to assess disaster preparedness with a sample size as big as the 2013 AHS. Therefore, while there is duplication in content, the 2013 AHS will provide a much larger sample and permit cross-tabulations by socioeconomic groups of interest to HUD.
4. Doubled-Up Households: The most current research report to make an attempt to estimate the population of doubled-up households is:

Mykyta, Laryssa and Macartney, Suzanne. June 2012. Sharing a Household: Household Composition and Economic Well-Being: 2007-2010. *Current Population Report* U.S. Census Bureau. Accessed July 7, 2012 at <http://www.census.gov/prod/2012pubs/p60-242.pdf>

The aforementioned report used data from the Survey of Income and Program Participation (SIPP). HUD PD&R feels that the SIPP-based analysis has shortcomings that make it difficult to accurately measure the doubled-up household population. First, SIPP does not address the issue of risk of housing loss. They focus instead on doubled-up households at the time of the interviews and shifts over different interview waves rather than on housing loss and out-movers. Second, SIPP questions do not directly allow for an assessment of "economic" doubled-up households, which is of the most interest to HUD. Instead, SIPP permits analysis of the presence of "additional adults," describing their basic demographic characteristics and shifts in numbers over time, plus changes in overall household economic

well-being and eligibility for means-tested public benefits given a change in household composition.

HUD's concluded that SIPP cannot provide the level of detail necessary to measure the households that are doubled-up due to economic hardship.

5. Neighborhood Social Capital: The proposed module includes 21 questions, each drawn from existing neighborhood-level surveys that have been field tested and revised over the past 18 years. While the content is nearly identical to previous surveys, the previous surveys have only been administered in a small number of metropolitan areas, including Chicago. Therefore, the AHS will provide a much larger and geographically diverse sample, thereby permitting detailed neighborhood social capital assessments in 25 metropolitan areas.

## **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 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**

- a. Federal Register Comments

Attached is a copy of the *Federal Register Notice* required by 5 CFR 1320.8(d). The following groups submitted comments.

1. The Corporation for Enterprise Development (CFED) sent a letter dated May 11, 2011 supporting the collection of the AHS. They requested that

we consider changes related to greater detail about manufactured housing titling, finance, and siting.

2. The Bureau of Economic Analysis sent a letter dated October 1, 2012 supporting the collection of AHS data. They noted the role of AHS data in the National Income and Product Accounts.
3. Reconnecting America sent a letter dated October 3, 2012 supporting the collection of the AHS. They noted that “the data included in the American Housing Survey enables us to inventory housing types, characteristics, and needs in a community and also allows us to understand the changing landscape of households across the country.”

b. Consultations Influencing the 2013 AHS Core Modules

1. During the development of the 1984 AHS-MS questionnaires, which were precursors to the 2013 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.
2. 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.
3. 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 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.
4. HUD and the Census Bureau routinely consult with outside groups who are frequent users of the AHS, including the National Association of Home Builders and the Harvard Joint Center for Housing Studies. Because of the depth of their experience with the AHS, these groups often make recommendations concerning minor changes to AHS questions. One example of such a recommendation was to modify the wording on a

question about the use of energy efficiency tax credit for home improvement to include mention of utility company incentives.

c. Consultations Influencing the 2013 AHS Rotating Topical Modules

The process of developing the 2013 AHS rotating topic modules included consultations with several outside groups.

1. Public Transportation and Pedestrian Accessibility: In developing this module, HUD reviewed three other sources of survey data on public transportation use:
  - The commuting questions in the ACS
  - The 2002 National Survey of Pedestrian and Bicyclist Attitudes and Behaviors (NSPBAB)
  - The 2009 National Household Travel Survey (NHTS) published by the Bureau of Transportation Statistics
  - “A Profile of Public Transportation Passenger Demographics and Travel Characteristics Reported in Onboard Surveys” published by the American Public Transportation Association in 2007.

HUD’s Office of Sustainable Housing and Communities guidance and HUD reviewed the module with NHTS experts during cognitive testing.

2. Neighborhood Observation: The questions in the Neighborhood Observation module are taken mostly verbatim from questions that had been in the Neighborhood Quality module and Observations module up until 2009. A modification was made to two prior questions about grocery store accessibility. In modifying the two questions relating to grocery store accessibility, HUD consulted with food accessibility researchers at the USDA Economic Research Service.
3. Disaster Planning: The questions were composed by HUD after consultation with outside organizations, particularly the National Disaster Housing Task Force (NDHTF). Much of the content is based on the FEMA guidelines for disaster preparedness, <http://www.fema.gov/plan-prepare-mitigate>.
4. Doubled-Up Households: The questions were developed by a panel of experts assembled by HUD PD&R’s and modified by AHS personnel at HUD and Census. The panel of experts included representatives from the Urban Institute, the University of Pennsylvania, the United States Interagency Council on Homelessness, Westat, the National Alliance to End Homelessness Research Institute, Abt Associates, and Wayne State University.

5. Neighborhood Social Capital: HUD PD&R consulted with Robert Sampson (Harvard University) and Cathy Haggerty and Michele Zimowski (NORC at the University of Chicago) to identify a group of questions that it expects will provide the best insights into the scalability of results from neighborhood-level surveys of social capital to larger areas. The proposed module includes 21 questions, each drawn from existing neighborhood-level surveys that have been field tested and revised over the past 18 years. Ten of these questions were cleared by OMB as part of the Choice Neighborhoods Demonstration – baseline research project.

## **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 major difference between the two letters is that the AHS-27 letter explains why the Census Bureau has returned to the address for another interview.

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 45 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. 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. For interviews conducted by telephone, FRs will read to the respondents a condensed version of the advance letter that includes the information required by the Privacy Act.

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 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 109,455. 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	122,275	45	91,796
Vacant	Sampled addresses intended for occupancy but currently without residents	18,425	20	6,080
Noninterview	Sampled addresses not intended for occupancy or occupants refuse to participate	26,800	0	0
<b>Total Addresses For Data Collection (DC)</b>		<b>167,500</b>		
Reinterview	Second quality control check interview at 7 percent of the above sampled addresses	11,725	10	1,954
<b>Total DC and Reinterview Addresses/Burden Hours</b>		<b>179,225</b>		<b>99,830</b>
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 2013 AHS, including 31 metropolitan areas, to be about \$33 million. The actual annual costs for the 2013 AHS are expected to be approximately \$30 million due to a reduction in the planned number of metropolitan area oversamples from 31 to 25. 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 on the 2011 AHS, adjusted for inflation, to complete past data collection and release public use files for the AHS.
- 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 sample in a non-data collection year. Maintenance includes completing the work to release the public use file for the AHS sample.

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 metropolitan 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 sample is smaller than it was in 2011.

We do not expect the respondent burden to change significantly, as the survey has been designed to maintain 2011's average length of interview of 45 minutes. We will preserve the same interview length in the following ways:

- a. The Home Accessibility and Housing Modifications modules have been removed.
- b. The rotating modules will be split among the test and control groups, thereby maximizing the number of rotating modules that can be included while no increasing overall response burden. The split will be:
  1. Control group: Public Transportation and Pedestrian Accessibility, Disaster Planning, and Doubled-Up Households
  2. Test group: Neighborhood Observation, Neighborhood Social Capital, and Doubled-Up Households

### **16. Project Schedule**

The Census Bureau has scheduled the 2013 field enumeration for the AHS survey to begin May 1 and end September 6, 2013. The reinterview data collection will begin May 6 and end September 20, 2013.

The projected release date of the first public use file is May 2014. 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 HUD. The summary reports will provide selected statistics at the national level involved. The Department of Commerce or HUD may release other publications. The projected timeline for the release of Internet tables and publications is August 2014 through December 2014.

#### **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.