

Supporting Statement for Paperwork Reduction Act Submission
American Housing Survey
OMB Number 2528-0017

A. Justification

1. Necessity of Information Collection

We request clearance for the proposed questions to be used on the 2019 American Housing Survey (AHS). We will collect data for the majority of the sample between June 1 and October 1, 2019. This request is a revision to the currently approved data collection request for the AHS under OMB Number 2528-0017.

In 2015, AHS began a new longitudinal panel. The sample design has two components: an integrated national sample, and an independent metropolitan areas sample. Furthermore, the integrated national sample includes three parts: (1) 34,906 national cases representative of the US and 9 Census divisions, (2) 5,185 subsidized renter oversample cases, and (3) 46,154 oversample of the top 15 metropolitan areas in the US. The total integrated national sample for 2019 will be 86,245. For 2019, the independent metropolitan areas sample will consist of an additional 10 metropolitan areas and will include 31,292 records (approximately 3,000 per metropolitan area). The ten metropolitan areas were selected from the U.S. Department of Housing and Urban Development's (HUD) "Next 20" group, as described in HUD's report, "Metro Area Selection Strategies & Decisions for the 2015 AHS & Beyond." The total AHS sample size will be 117,537.

Starting in 2009, the AHS questions were classified into "core" modules and "supplemental" 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 minor revisions between surveys. Questions in the supplemental modules are asked on a supplemental basis.

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

HUD uses 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 2019 data collection procedures and questionnaire content are similar to the 2017 survey with the following exceptions:

- a. Removal of Four Supplemental Modules from the 2017 AHS: The Disaster Planning, Delinquent Payments and Notices, Commuting, and Eviction supplemental modules will not be included in the 2019 survey.
- b. Reinstatement of the Food Security Module: The Food Security module was first included in the 2015 AHS. For the 2019 AHS, there are no changes to this supplemental module. It will continue to collect data on the intersection between food security and housing costs. Food-insecure households lack consistent access to adequate food for one or more household members. To this point, data have not been available to enable research on housing burden and food security jointly. Food security data in the AHS would support research to understand this relationship at the household level, and to examine the role housing and energy assistance may have in moderating it. Most policy research has focused on the effects of food and nutrition assistance programs on food insecurity. The 2019 AHS will allow analysis of how HUD assistance programs, especially rental assistance, affect food security assistance.
- c. Introduction of Two New Supplemental Modules: To continue the strategy of supplemental modules in order to minimize respondent burden and satisfy widening needs for data content, two new supplemental modules have been added to the survey – Home Accessibility and Post-Secondary Education modules. These modules collect data on modifications made to assist occupants living with disabilities and details about the experiences of household members attending a post-secondary institution. The Home Accessibility module is derived from the 2011 AHS module on modifications made to the house to accommodate persons with disabilities. Please refer to the attached items booklet for the questions in these modules and the entire AHS questionnaire.
- d. Introduction of a Housing Insecurity Research Module Follow-On: The goal of developing the Housing Insecurity Research Module is to collect data that can be used to *explore the feasibility* of constructing a standardized series of questions to measure the continuum of housing insecurity in the model of the transferable U.S. Household Food Security Survey Module developed by the U.S. Department of Agriculture (USDA). A transferable survey module, if feasible, will help researchers build a more robust and coherent body of knowledge around housing needs, trade-offs, and correlates, enhancing the quality and consistency of policy-relevant research, and amplifying the visibility of the continuum of housing needs. A transferable module that produces a household-level housing insecurity score will be a tool for studying both the extent to which housing insecurity explains other observed outcomes and which interventions are likely to improve housing security.

The Housing Insecurity Research Module follow-on will be administered after the regular AHS interview. The Module will be administered to 4,000 AHS respondents selected based on income and other criteria.

- e. Sample Split for Supplemental Modules: A split of the survey sample will be used to maximize the number of supplemental modules that can be included in the 2019 AHS. Fifty percent of the sample will be asked the Post-Secondary Education and Food Security modules. The other 50 percent will be asked the Home Accessibility module. As noted above, 4,000 respondents will receive the Housing Insecurity Research Module.

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 2019 reinterview instrument will contain five questions. Each respondent will be asked all five questions; however, the questions have been revised to be more general and memorable. 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 supplemental 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 responses of units that match to HUD administrative records of subsidized housing.

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's Office of Policy Development and Research (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 homebuyers, 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.

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 (EIA) issues an annual report “Annual Energy Review” using the heating fuel data collected in AHS (<http://www.eia.gov/totalenergy/data/annual/>).

Data from the AHS are the primary input into Harvard’s Joint Center for Housing Studies estimate of the size of the remodeling market (<http://www.jchs.harvard.edu/research/remodeling-futures>).

c. Supplemental Module Needs and Potential Uses

New data are being collected in the 2019 survey on housing insecurity, access to adequate food for one or more household members, post-secondary education, and how well people’s homes meet their mobility needs. We will collect this data in the following four modules.

1. Housing Insecurity Research Module: HUD needs the housing insecurity research module data to *evaluate the feasibility* of collecting data on housing insecurity, to better define housing insecurity, and to aid in identifying a smaller set of questions that could, if found to be feasible, measure the continuum of housing insecurity in a composite scale. A robust discussion of the motivation, process, and question design and scale development tenets that informed the module’s development is available in “Towards Implementation of a National Housing Insecurity Research Module” available at: <https://appam.confex.com/appam/2018/webprogram/Paper27414.html>)

Because the AHS collects essential data used to estimate worst case housing needs and related special topics, such as food security, it is a prime venue for exploring new housing insecurity measures and analyzing index options. Through the housing insecurity research module, HUD seeks to classify housing units across the housing security spectrum from housing secure to housing insecure in much the same way that the U.S. Household Food Security classifies households on a continuum from Food Secure to Food Insecure. Asking the housing insecurity research module of households who have responded to the core AHS questions enables HUD to validate housing insecurity questions against established measures of housing affordability and adequacy (such as those used in the Worst Case Needs Report). The module will also be validated against household food security index scores and contextual questions about stress and basic needs trade-offs.

With the data from the housing insecurity research module, HUD aims to use data reduction techniques like exploratory factor analysis and principal components analysis to identify a smaller set of questions that can be used in a validated index of housing insecurity. HUD commits to engage in discussions with OMB, interagency partners, and housing insecurity experts as it explores whether it is possible to develop a housing insecurity scale from questions evaluated in this research project and analyzes potential scale options, including whether the proposed multidimensional framework may be reduced to a unidimensional scale. Any initial proposals for a scale developed through this research would need to be assessed and calibrated over time. It is HUD's hope that a composite housing insecurity scale could eventually be used by federal agencies and external researchers to track trends in housing insecurity and associate it with outcomes, including, but not limited to, health, education, employment, and criminal justice outcomes.

2. Food Security Module: Returning from the 2015 AHS, the 2019 AHS will include the Food Security module as a supplemental module to collect the intersection between food security and housing costs. Food-insecure households lack consistent access to adequate food for one or more household members. To this point, data have not been available to enable research on housing burden and food security jointly. Food security data in the AHS would support research to understand this relationship at the household level, and to examine the role housing and energy assistance may have in moderating it. Most policy research has focused on the effects of food and nutrition assistance programs on food insecurity. The 2019 AHS will allow analysis of how HUD assistance programs, especially rental assistance, affect food security assistance.
3. Post-Secondary Education Module: The Post-Secondary Education questions expand on the current education questions in the AHS. For 2019, the AHS will collect more details about the experiences of household members attending a post-secondary institution, as well as, continue to identify those attending high school. The reference period of March in some of the questions was chosen to identify a period in the year when most schools are in session and before people will have passed on to the next level, graduated, or moved away.
4. Home Accessibility Module: The Home Accessibility module focuses only on whether a home has accessibility features or not, and does not touch on user-home mismatch, or history of adding any of these elements. Using the 2011 Home Accessibility module as a base, HUD and the Joint Center wanted to assess whether the proposed questions for 2019 would help data users get at the varying levels of accessibility. Many of these questions are designed to ascertain whether a home is fully wheelchair accessible. According to the National Institutes of Health (NIH), 2.2 million people in the US depend on a wheelchair for daily tasks and mobility. While this is a critical group, this

module sets out to understand safety and accessibility features for the many millions who have mobility disabilities that do not require wheelchairs, and those with no diagnosed disabilities but who may have some level of limitations or frailness. These questions allow the AHS to ascertain what features are specifically lacking and further understand where deficiencies in the stock lie.

The collection of disability data helps to accomplish goals detailed in HUD's Strategic Plan to "Rethink American Communities". In the goal "Enhance Rental Assistance"

(<https://www.hud.gov/sites/dfiles/SPM/documents/HUDSTRATEGICPLAN2018-2022.pdf>), 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.

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 (NAHB), the American Association of Retired Persons (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.

Finally, 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 enumeration. A Census Bureau Field Representative (FR) conducts the interview via a Blaise Computer Assisted Person Interview (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 U.S. Census Bureau interviewers will conduct the Housing Insecurity Research Module interviewing using Computer Assisted Telephone

Interviewing (CATI). Using an automated call scheduler, interviewers are conducted via centralized data collection software (WebCATI) that uses a Blaise CATI instrument. The same survey instrument will be used for all interviews. However, the automated instrument code includes skip patterns to decrease respondent burden for households in sample.

The AHS has not collected 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. However, the Census Bureau has plans to use a multimode Internet self-response and CAPI survey in a future interview cycle.

b. Data Dissemination

The Census Bureau currently makes public-use micro data collected by the AHS available to the public on the Census Bureau Internet Web site at:

<http://www.census.gov/programs-surveys/ahs>

The Census Bureau will make the 2019 AHS summary data available via the AHS Table Creator Tool

(<http://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html>).

The data being disseminated and released are not individually identifiable and will have been cleared for release/dissemination by the Census Bureau's Disclosure Review Board.

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 both 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), neither of these surveys provide the longitudinal data over a period of years or 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. However, human behavior in general is conditional on fundamental familial, demographic, housing, and economic variables. Generally, 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 Supplemental Modules

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

1. Housing Insecurity Research Module: There is no comprehensive transferable instrument for measuring housing insecurity that is currently used by national surveys. Housing Insecurity has not been measured in one consistent way throughout the research literature. PD&R's "Towards Implementation of a National Housing Insecurity Research Module" describes the variety of measurement approaches currently employed as well as the surveys and literature from which questions were adapted for this module.

The Housing as a Platform Knowledge Collaborative (KC) in HUD's PD&R influenced by work by Robynn Cox at the University of Southern California ("Roadmap to a Unified Measure of Housing Insecurity") and the Urban Institute ("Measuring Housing Insecurity"), gathered over 300 references on the measurement of housing insecurity, developed an operational definition of housing insecurity, and organized an expert convening in August 2017 to discuss the definition and questions that should be included in a housing insecurity research module.

Based on a review of the housing insecurity literature and feedback from the expert convening, the KC developed the following definition of housing insecurity: Housing Insecurity is defined as a significant lapse for a given

household of one or more elements of secure housing. These elements include affordability, stable occupancy, and whether the housing is decent and safe. “Affordability” implies that shelter costs are manageable over the long term without severely burdening or compromising other consumption that normally is essential for health and well-being. “Stable occupancy,” implies that the household does not face substantial risk of involuntary displacement for economic or non-economic reasons. “Decent and safe,” implies that a unit has physical attributes that satisfy functional needs for well-being related to health, security, and support for the activities of daily living. Such attributes include appropriate facilities for excluding external threats, providing climate control, storing and preparing food, maintaining physical and mental hygiene, and developing human potential. Not included are aspects of the neighborhood or environment that one encounters beyond the confines of the structure or property.

2. Food Security Module: Since 1995, the USDA has included an annual supplement in the Census Bureau’s Current Population Survey (CPS) to measure the prevalence of household food security in the United States. In addition, other federal surveys have fielded food security question but none have included housing data. The standard screening in the module reduces respondent burden considerably. In addition, the HUD assisted oversample in the AHS will provide unique insight into the effects of housing assistance on food security. Most policy research has focused on the effects of food and nutrition assistance programs on food insecurity. The AHS would allow analysis of how HUD assistance programs, especially rental assistance, affect food security.
3. Post-Secondary Education Module: Since 2005, the Bureau of Labor Statistics (BLS) and National Center for Education Statistics (NCES) has included an annual supplement in the Census Bureau’s CPS to measure school enrollment, junior or regular college attendance, and high school graduation. In 2015, HUD published a report titled “Barriers to Success: Housing Insecurity for U.S. College Students” exploring the impact of rising college housing costs and tuition rates and federal assistance available to students. Most research has focused on student enrollment and housing separately. The AHS would allow analysis of the cross-section between current school enrollment, program type, and housing during school enrollment.
4. Home Accessibility Module: Much of the content is based on the 2011 AHS Home Accessibility module. The American Community Survey (ACS) conducted by the Census Bureau collects information on disability along with other demographic characteristics. In 2014, ACS published a report on “Older Americans With a Disability: 2008-2012”. This data focused on the correlation between various demographic characteristics and

current living arrangement. In 2012, the Current Population Survey (CPS) included a supplement on disability for the BLS to measure data specific areas related to the employment of persons with disabilities. The AHS would allow analysis of current housing stock and mobility needs of persons with disabilities.

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. For unoccupied units, data are collected from a “knowledgeable respondent,” who could be a landlord, property manager, rental agent, real estate agent, or neighbor.

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 worst case housing needs. Without this ability, the Administration and Congress would be unable to formulate policy on housing assistance.

7. Special Circumstances

- Requiring respondents to report information to the agency more than quarterly; **Not Applicable.**
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **Not Applicable.**
- Requiring respondents to submit more than an original and two copies of any document; **Not Applicable.**
- Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Not Applicable.**
- In connection with a statistical survey that is not designed to produce valid and reliable results than can be generalized to the universe of study; **Not Applicable.**
- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **Not Applicable.**
- That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; **Not Applicable.**
- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to

protect the information's confidentiality to the extent permitted by law. **Not Applicable.**

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 Notice was published on September 11, 2018.

HUD received one comment from the BEA expressing strong support for conducting the 2019 AHS.

b. Consultations Influencing the 2019 AHS Core Modules

The content of the 2019 AHS Core Modules are the result of many years of consultation and testing starting with the development of the 1984 AHS questionnaire. For the original 1984 AHS questionnaire approximately 250 prospective data users were consulted who represented diverse areas of interest. The BEA suggested modifications to the original questionnaire to improve BEA's estimates and to improve the clarity and consistency of the questions.

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 (JCHS). Because of the depth of their experience with the AHS, these groups often make recommendations concerning minor changes to AHS questions. The Neighborhood Quality Module was added to the core and the number of questions in the module was reduced after consultation with NAHB. In consultation with JCHS, questions on the date of completion and the source of financing for remodeling jobs were added to the Home Improvement and Remodeling Module. We also worked with JCHS to combine some of the Home Improvement job categories to reduce respondent burden. The EIA at the Department of Energy was consulted in the development of utility cost allocation models, which are used to model utility costs using household and housing characteristics and climate data in the 2019 AHS.

c. Consultations Influencing the 2019 AHS Supplemental Modules

The process of developing the 2019 AHS supplemental topic modules included consultations with several outside groups.

1. Housing Insecurity Research Module: The Housing as a Platform Knowledge Collaborative (KC) in HUD’s Office of Policy Development & Research began development work on the housing insecurity module in 2016. Influenced by work by Robynn Cox at the University of Southern California (“Roadmap to a Unified Measure of Housing Insecurity”) and the Urban Institute (“Measuring Housing Insecurity”), the KC gathered over 300 references on the measurement of housing insecurity, developed an operational definition of housing insecurity, and organized an expert convening in August 2017 to discuss the definition and questions that should be included in a housing insecurity research module. The expert convening included experts from federal agencies, academia, and research organizations. The expert convening included: Sherri Lawson Clark (Wake Forest University); Robynn Cox (University of Southern California); Mary Cunningham (Urban Institute); Matthew Desmond (Princeton University); Scott Holupka (Johns Hopkins University); Jill Khadduri (Abt Associates); Eileen Díaz McConnell (Arizona State University); Ann Elizabeth Montgomery (U.S. Department of Veterans Affairs’ National Center on Homelessness Among Veterans); Matthew Rabbitt (USDA Economic Research Service); Megan Sandel (Boston Medical Center’s Children’s HealthWatch); Scott Susin (HUD Office of Fair Housing and Equal Opportunity); John Weicher (Hudson Institute); and Jonathan Wilson (National Center for Healthy Housing).

The KC developed a housing insecurity research module, which includes questions tapping dimensions of the housing insecurity operational definition that could potentially be used in a housing insecurity index. The draft housing insecurity research module was shared with expert convening participants, HUD staff, and George Engelhard, scale development expert at the University of Georgia, in October 2017. The KC revised the housing insecurity research module based upon feedback received and submitted the module to Census for review in November 2017. Since then, the housing insecurity research module has undergone multiple rounds of review at HUD and by housing subject matter and survey methodology experts at Census.

2. Food Security Module: This module was adapted from the USDA Economic Research Services’ (ERS) U.S. Household Food Security Survey Module. There are several variations of the Household Food Security Survey Module (<http://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/survey-tools.aspx>). An 18-item module that includes 10 adult items and 8 items about children is used in USDA’s national prevalence measure. However, USDA recommends including the 10-item adult food security survey module on the AHS. These 10 items include three questions that refer to the household as a whole and seven questions that reference the

adults in the household. USDA concluded that the 10 adult/household items provide sufficient detail regarding the food situation of the household without asking the sensitive child items and it has lower response burden than the 18-item module.

3. Post-Secondary Education Module: For the 2019 supplemental module, HUD consulted with representatives from the Department of Education. In constructing a draft module, the Department of Education recommended HUD use questions from other Department of Education surveys, the American Community Survey, and the Current Population Survey.. The final module developed by HUD in consultation with the Department of Education includes questions on enrollment in college and vocational, technical, trade and business schools, whether enrollment is full or part time, whether the school is public or private, and whether the household member lived in the housing unit or dorm while enrolled.
4. Home Accessibility Module: For the 2019 supplemental module, HUD consulted with representatives from the Joint Center for Housing Studies at Harvard, the National Association of Home Builders, AARP, and advocates for the disabled. In the initial draft of the questions, the group attempted to gather data that gets at varying levels of accessibility – visitability, some features without full accessibility, and full wheelchair accessibility. Questions regarding permanence of accessibility modifications, room access in multilevel homes, and many of the questions were designed to ascertain whether a home is fully wheelchair accessible. After further consultation, the group decided on a 13-item module with a focus on mobility limitations rather than limit the questions to wheelchair accessibility. The 13-item module will focus on three themes: 1) extended disability, 2) features of the home, and 3) future plans.

Many of the questions in the 2019 supplemental module were adapted from the 2011 Home Accessibility module. The 2011 Home Accessibility module contains questions from a 1995 AHS supplement that were adapted with input from Center for Disease Control (CDC) representatives (via OMB).

9. Paying Respondents

- a. Housing Insecurity Research Module: At the end of the regular AHS interview, households who meet income and AHS questionnaire criteria will be asked to opt-in to the Housing Insecurity Research Module follow-on sampling pool. The promise of a \$40 gift card for those who complete the Housing Insecurity Research Module questionnaire is included as part of the invitation. If the AHS respondent opts-in and the household is selected for the Housing Insecurity Research Module follow-on, and then

completes the interview, the respondent will receive a \$40 gift card via postal mail.

Since Housing Insecurity Research Module respondents voluntarily agree to take on further burden above and beyond responding to the AHS, we will provide them with a \$40 gift card as a token of appreciation for doing so. Data from the Housing Insecurity Research Module are necessary to facilitate the process of identifying a smaller set of Housing Insecurity questions to include in the AHS (and other surveys) from which a Housing Insecurity Index can be created. Identifying a smaller set of questions is necessary for the Housing Insecurity Module to be transferable across surveys. The questions in the Housing Insecurity Research Module have been cognitively tested by Census and revised by Census and HUD to ensure that they are both understood by respondents and effectively operationalize the components of Housing Insecurity set forth in the working definition. Including the Housing Insecurity Research Module as a one-time follow-on to the AHS allows us to link Housing Insecurity Research Module responses to AHS Core responses, including questions on housing affordability and quality, reducing the number of questions asked in the Housing Insecurity Research Module. While Housing Insecurity Research Module responses are able to be linked to core AHS responses, the Housing Insecurity Research Module is a one-time standalone survey distinct from the AHS, but necessary for the development of a Housing Insecurity Index. A sufficiently large sample is needed to determine the smaller set of questions needed to develop the index and an incentive is necessary to encourage participation in the Housing Insecurity Research Module and to express appreciation for respondent participation.

Several research findings informed the decision to set the gift card amount at \$40. In research on the Consumer Expenditure Survey, Goldenberg et al. (2009) found that \$40 incentives were effective at increasing response rates and reducing field costs by reducing the number of contacts required to complete interviews. In research on the Survey of Income and Program Participation (SIPP), Creighton et al. (2007) found that \$20 incentive worked with the lowest-income groups, but \$40 incentives were more effective with groups with higher incomes. Our sample targets renters and owners with household incomes under 300% of the poverty level, with a majority under 200% of the poverty level. As our sample includes a range of lower incomes, the \$40 incentive is an effective incentive level for our sample. Other research has found that there may be diminishing returns in the effectiveness of incentives at higher levels. Croft et al. (2007) found that \$40 had the same effect on response rates as \$70. Horrigan and Herz (2004) in research on the BLS Time Use Survey, found that respondents reported that \$20 was too low of an incentive and \$50 was too high.

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 (AHS-26/66(L)) in advance of the interview containing the information required by this act.

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. We also display the program website and the 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.

Respondents who are selected for and who complete the Housing Insecurity Research Module follow-on will receive an additional "Thank You" Letter (AHS-XX(L)).

The data collected under this agreement are confidential under Title 13, U.S.C., Section 9(a). 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 about 58,892 hours. Refer to the following table for more detailed information.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Regular AHS							
Occupied Interviews	79,958.00	1.00	79,958.00	.66	52,772.00	\$0.00	\$0.00
Vacant Interviews	11,793.00	1.00	11,793.00	.33	3,892.00	\$0.00	\$0.00
Non-interviews	22,388.00	1.00	22,388.00	.00	0.00	\$0.00	\$0.00
Ineligible	3,398.00	1.00	3,398.00	.00	0.00	\$0.00	\$0.00
Subtotal	117,537.00	1.00	117,537.00	.00	.00	\$0.00	\$0.00
Reinterviews	8,400.00	1.00	8,400.00	.17	1,428.00	\$0.00	\$0.00
Regular AHS sub-total	125,937.00		125,937.00		58,092.00		
Housing Insecurity Research Module Follow-On							
Occupied Interviews	4,000.00	1.00	4,000.00	.20	800.00	\$0.00	\$0.00
Non-interviews	0.00	0.00	0.00	.00	0.00	\$0.00	\$0.00
Ineligible	0.00	0.00	0.00	.00	0.00	\$0.00	\$0.00
Follow-on sub-total	4,000.00		4,000.00		800.00		
Final Total	0.00				0.00		\$0.00

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 2-year survey cycle costs to the government for the 2019 AHS, including 10 metropolitan areas, to be \$66.4 million.

Cost Items	FY 2018	FY2019	Total
Professional Staff	\$11,500,000.00	\$13,000,000.00	\$24,500,000.00
Field Data Collection		\$40,000,000.00	\$40,000,000.00
Technology	\$0.00	\$1,900,000.00	\$1,900,000.00

TOTAL	\$11,500,000.00	\$54,900,000.00	\$66,400,000.00
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The figures above are based on the following factors.

- For professional staff, the estimates are based on actual money spent in FY 2018 and budgeted “not-to-exceed” amounts for FY 2019. Professional staff include survey methodologists, statisticians, computer programmers and other IT support, communications specialists and managers.
- For field data collection, projected costs reflect “not-to-exceed” amounts. The projected costs are provided by the Census Bureau’s field case management cost projection model. The cost projection model uses information on costs from prior surveys (including, but not limited to, the AHS), specifications for the current AHS, and current local and regional labor rates.
- Technology costs include purchase and maintenance of laptops. This estimate is provided by the Census Bureau and reflects a cost-sharing portion of the Census Bureau’s annual technology costs CAPI-based surveys. All surveys using CAPI share in the cost of technology.

15. Reason for Change in Burden

The estimated respondent burden for 2019 (58,892 hours) is slightly less than respondent burden cited in the 2017 AHS Supporting Statement. There are two reasons for this. First, this regular AHS sample size is smaller because we retired the “bridge” sample after the 2017 AHS, which was always the intention of HUD and Census. We also expect lower response rate in 2019, relative to what was originally estimated in the 2017 AHS Supporting Statement. Our estimated 2019 AHS response rates are based on what was observed in the 2017 AHS.

The 2019 AHS sample will be split into two groups. Fifty percent of the sample will be asked the Home Accessibility module. The other 50 percent will be asked the Post-Secondary Education and Food Security modules. This will maximize the number of supplemental modules that can be included while not increasing overall response burden.

16. Project Schedule

The Census Bureau has scheduled the majority of 2019 field enumeration for the AHS survey, including the Housing Insecurity Research Module follow-on, to begin May 1 and end September 1, 2019. The entire reinterview data collection will span May 2 through September 15, 2019.

The projected release date of the National and Metropolitan public use files (PUFs) is summer 2020. 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.

HUD and the Census Bureau will issue product announcements when releasing the PUFs, as well as the Table Creator tables as agreed upon with HUD. The Department of Commerce or HUD may release other publications.

The data being disseminated and released are not individually identifiable and will have been cleared for release/dissemination by the Census Bureau's Disclosure Review Board.

17. Request to Not Display Expiration Date

The OMB number and expiration date will be included on the AHS-26/66(L) Advance Letter. 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.