

Department of Commerce
U.S. Census Bureau
OMB Information Collection Request
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 an extension 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 131, and 182 to collect information on new residential buildings (Attachment E).

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 do not plan any changes to the information we collect on the C-411 forms. The three variations of the C-411 form can be found in Attachments A-C.

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2. Needs and Uses

The appropriate form is sent to a jurisdiction when the Census Bureau 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. We anticipate approximately a 50% response rate to the mailed C-411 forms, which is supplemented with existing known information from the C-404 monthly and annual collection, individual follow-ups with jurisdictions by email or phone, and publicly available information to maintain coverage for the universe of permit issuing places. We anticipate having accurate and up to date coverage for the universe for over 85% of jurisdictions as a result of these combined operations.

1We use the information to verify the existence of new permit systems or changes to existing systems. Based on the information, the Census Bureau 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

1The current system does not support electronic data collection for this survey, however, the Census Bureau is considering adding this collection to the standard online collection instrument (Centurion) for the 2022 mailing. This form is mailed to active local governments to verify their permit-issuance status. Additionally, the form requests the permit jurisdiction's website and the email address of the contact person to allow further follow-up electronically. Sample survey forms and the cover letter are available on the Census Bureau Internet site, and can be found in Attachments A-D.

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 950 building permit offices that have been sampled for the Survey of Construction. Form C-411 is needed to update the coverage of the remaining 19,050 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 five 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. As previously mentioned, 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. 85, No. 217, Page 71305) on November 9, 2020, inviting public comments on our plans to submit this request. No comments were received during the 60-day comment period.

9. Paying Respondents

The Census Bureau does not pay respondents or 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 inform the respondents of the voluntary nature of this survey both on the cover letter (Attachments 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 Responses in 5 year	Avg. Burden Hour per Response	Total Burden (hours) in 5 years	Average Annual Burden
Every 5 years	3500	1	3500	.25	875	175
Supplemental Requests/year	150	1	600	.25	150	30
Total	3650	1	4100	.25	1,025	205

Based on information from the respondents, we estimate that the average time to complete the form is 15 minutes. Approximately 3,500 forms are mailed every 5 years, with approximately 150 supplemental requests via e-mail/phone for the four years following. This results in 1,025 total burden hours over a five-year period, thus an average annual response burden of 205 hours.

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 to the Federal Government for the Building Permits Program, of which this questionnaire is a part, is expected to be relatively fixed over the upcoming three years at approximately \$2,500,000, all borne by the Census Bureau. This estimate includes the cost for such things as data collection, processing, review of tabulated data, publication, equipment, overhead, printing, support staff, etc.

15. Reason for Change in Burden

The burden hours were reduced from the last submission from 500 annual hours to 205 annual hours due to an effort to reduce collection and processing costs. Starting in 2017, it was decided to send the form only to jurisdictions most likely to report a coverage change and jurisdictions that do not report to us on a regular annual basis. This reduced the mailout from approximately 10,000 forms to 3,500, thus reducing the annual burden hours.

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 BPS and SOC 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.