

# Paperwork Reduction Act Change Worksheet

Agency/Subagency: <b>U.S. Department of Housing and Urban Development</b>	OMB Control Number: <b>2528-0029</b>
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Enter only items that change	Current Record	New Record**
Agency form number(s): N/A	N/A	N/A
<b>Annual reporting and keeping hour burden</b>		
Number of respondents	4860	4860
Total annual responses	4860	4860
Percent of these responses collected electronically	100 %	100 %
Total annual hours	1604	1604
Difference	0-no difference	0-no difference
Explanation of difference Program change Adjustment	No change	No Change
<b>Annual reporting and recordkeeping cost burden</b> (in thousands of dollars)		
Total annualized Capital/Startup costs	0	0
Total annual costs (O&M)	0	0
Total annualized cost requested	0	0
Difference	N/A	N/A
Explanation of difference Program change Adjustment	No change	No Change

Other change: \*\*

**2021 Manufactured Housing Survey – Recommended Changes:**  
**Type of Home**

Original Wording:

**Type of home** [Single-Wide; Double-Wide]

Recommended Wording:

**Type of home** [Single-Wide; Multi-Section]

Reason for change: Type of home is pre-filled on the form. In published tabulations, Census uses the categories single-wide and multi-section, because the double-wide category includes both double-wide homes and homes with more than two sections. The wording change makes the questionnaire wording consistent with how it is tabulated and has no practical effect on how the data are reported.

**Sales Price of Home**

Original Wording:

**What is the sales price of this home?** (Include options and dealer setup costs. Exclude all taxes and land costs)

Signature of Senior Official or Designee:  X	Date:	<b>For OIRA Use</b>
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\*\* This form cannot be used to extend an expiration date.

Recommended Wording:

**What was the sales price of this home, or, if not sold, what is the listed price?** (Include dealer set up costs. Exclude all taxes, land costs and on-site improvements.)

Reason for change: The currently approved question only asks about the sales price. Listed price was added to the question because not all homes have been sold by the time of interview. After discussions with Census and MHI, the decision was made to slightly change the question wording to indicate when the listed price should be provided and update what should be included and excluded from the price. We do not believe these question changes will affect the average sales price data.

### On-Site Placement

Tested Wording:

**Has this home been placed on site?**

- Yes - *continue to question 2*
- No - *end survey*

Recommended Wording:

**Has this home been placed at its final destination?**

- Yes - *continue to question 2*
- No - *end survey*

Reasons for change: Respondents expressed confusion in the tested question as to the meaning of “On-Site” placement. We propose to instead ask “Has this home been placed at its final destination?”

### Placement Location

Original Wording:

**At what location was this home placed?**

*(Provide intended location, if not yet placed)*  
Zip Code County State

Recommended Wording:

**At what location was this home placed?**

*(Provide intended location, if not yet placed)*  
City Zip Code State

Reason for change: While the currently approved questionnaire asks for zip code, county, and state, during cognitive testing, only zip code and state were asked. Due to disclosure avoidance requirements, county level data cannot be released in tabulations. In the event that zip code is not provided, the city response will provide Census with useful data for zip code imputations.

### Community and Ownership of Placement Location

Original Wording:

**Is this location:**

- a. In a park, court, or community?
- b. In a subdivision or a planned unit development?
- c. NOT in any of the above?

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Recommended Wording:

**Is this location...**

- a.  In a land-lease community/manufactured home community?
- b.  On private property in a subdivision or planned unit development? c.
- On other private property?
- d.  NOT in any of the above? **Please explain**

Reasons for change: The original question wording does not measure whether the land on which the home is placed is owned or leased. The version of the question tested, which was proposed by MHI, collects information on the community and land ownership in the which the manufactured home is placed. We propose adopting the tested wording.

**Footings, Piers, and Securing Methods**

Original Wording:

**4. Was this home placed on**

- 1. A permanent masonry or concrete foundation?** – If 1, then skip question 5
- 2. Steel Stands?**
- 3. Blocks?**
- 4. Some other way?**

**5. How is this home secured?**

- 1. Secured by tie-down straps and anchors**
- 2. Secured by some other means**
- 3. NOT secured**

Recommended Wording:

**1. What type of footings is this home placed on?** (If a or b, skip questions 2 and 3)

- a.  Monolithic slab foundation
- b.  Basement/crawl space foundation
- c.  Concrete footings
- d.  Pressure-treated wood of ABS footings
- e.  Some other type. **Please explain.**

**2. What type of piers is this home placed on?**

- a.  Concrete blocks
- b.  Pressure-treated wood blocks
- c.  Manufactured steel or concrete stands
- d.  Some other type. **Please explain.**

**3. How is this home secured?**

- a.  Secured by anchors and tie-down straps
- b.  Secured by anchors and an alternative foundation system
- c.  Secured by some other means. **Please explain.**

Reasons for changes: In their comments on the 60-Day Notice, MHI argued that questions on footings, piers, and anchoring were outside of HUD’s authority under 42 U.S.C. 5424 to collect information outside of what is specified in the Housing and Community Development Act of 1980. It was unclear to them why the questions are asked and what HUD uses the information for. These questions are currently tabulated by Census as part of the MHS Annual Characteristics Report. HUD’s Office of Manufactured Housing Programs (OMHP) confirmed that it uses this data to inform potential standards changes and or use in regulatory and economic impact analyses for any proposed changes that may impact these areas of manufactured home installation.

Signature of Senior Official or Designee:	Date:	<b>For OIRA Use</b>
X		

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