

Supporting Statement for Paperwork Reduction Act Submissions
Manufactured Housing Survey
(OMB# 2528-0029)

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The U.S. Department of Housing and Urban Development is requesting an extension of a currently approved collection for the Manufactured Housing Survey (MHS) (Form C-MH-9A). Manufactured housing provides much of the low-cost new housing in the United States. In 2023, over 89,000 new units were shipped from manufacturing plants to local dealers, with the majority of these homes being intended for residential use. These homes make up about nine percent of all new single-family housing. Given the size and importance of this component of new housing, the Department of Housing and Urban Development (HUD) has funded this survey conducted by the Census Bureau since the early 1970's. The survey provides key statistics on the number, sales price, location, and selected characteristics of new manufactured homes placed for residential use. These statistics, based on data collected by form, fax, online reporting and telephone interview from dealers that have received sampled homes, are comparable to those available for conventionally built housing. Statistics on manufactured homes and conventional housing construction are available on the Internet at www.census.gov.

In the “National Manufactured Housing Construction and Safety Standards Act of 1974,” 42 U.S.C. 5401 (see: <https://www.govinfo.gov/content/pkg/USCODE-2023-title42/pdf/USCODE-2023-title42-chap70-sec5401.pdf>), Congress declared its interest in the safety and durability of manufactured homes. Proper attachment of a manufactured home to the ground is an important component of manufactured home safety and is addressed in Section IV, questions 5, 6 and 7 of Form C-MH-9A (see Attachment 2). HUD is authorized to collect these statistics under the “Housing and Community Development Act of 1980,” Title 42 U.S.C. 5424 note (see: <https://www.govinfo.gov/content/pkg/USCODE-2023-title42/pdf/USCODE-2023-title42-chap70-sec5424.pdf>), which provides the Secretary discretion to take necessary actions to ensure the public is aware of the distinctions between the types of factory-built housing. This allows HUD to collect and report manufactured home sales price information for the nation, Census Regions, States, and selected metropolitan statistical areas, and to monitor whether new manufactured homes are being placed on owned rather than rented lots. Congress also indicated an interest in the form of ownership. Collection of these data is authorized by Title 13, U.S.C., § 8(b) (see: <https://www.govinfo.gov/content/pkg/USCODE-2023-title13/pdf/USCODE-2023-title13-chap1-subchapI-sec8.pdf>) and Title 12, U.S.C., § 1701z-1 (see: <https://www.govinfo.gov/content/pkg/USCODE-2023-title12/pdf/USCODE-2023-title12-chap13-sec1701z-1.pdf>).

Furthermore, the MHS serves as a basis for HUD's mandated indexing of loan limits. Section 2145 (b) of the Housing and Economic Recovery Act (HERA) of 2008 requires HUD to develop a method to annually adjust Title I manufactured home loan limits (see: <https://www.govinfo.gov/content/pkg/PLAW-110publ289/pdf/PLAW-110publ289.pdf>). This index is partially based on manufactured housing price data collected by this survey. Section 2145 of the HERA of 2008 also amends the maximum loan limits for manufactured home loans insured under Title I. The Final Rule, entitled *Indexing Methodology for Title I Manufactured Home Loan Limits*, was published in the Federal Register on February 28, 2024 (see: <https://www.federalregister.gov/documents/2024/02/28/2024-04138/indexing-methodology-for-title-i-manufactured-home-loan-limits>). This Rule established separate indexing methodologies to annually calculate future loan limits for Manufactured Homes Loans, Manufactured Lot Loans and Manufactured Home and Lot Combination Loans for the Title I Manufactured Home Loan Program. Single- and double-section price data from this survey are used to determine maximum loan amounts for Title I Manufactured Home Loans. HUD implemented the revised loan limits for all manufactured home loans for which applications are received on or after March 29, 2024 (see: <https://www.hud.gov/sites/dfiles/OCHCO/documents/TI488.pdf>).

- 2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Bureau of Economic Analysis uses the data as an input to the quarterly and annual estimates of the residential investment component of gross domestic product.

HUD's Office of Economic Affairs uses these data to monitor total new housing production and its affordability. HUD's Office of Manufactured Housing and Construction Standards and the Office of Title I Insurance use the data to monitor and evaluate their programs as they relate to the volume, titling, placement location, quality, and prices of manufactured homes. Also, the figures are used by a variety of private trade associations and businesses for housing market analysis.

The Census Bureau also uses the data in the formulation of annual population estimates. These uses are consistent with how the information has been used in the past.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Information received is based on data collected through internet reporting (Centurion) or telephone interview with dealers that have received sampled homes. The survey data is captured using the Standard Economic Processing System II (StEPSII). StEPSII is the

Census Bureau's generalized automated data collection/processing system developed for numerous economic surveys.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Inquiries of knowledgeable industry sources, such as the Institute for Building Technology and Safety and the Manufactured Housing Institute, indicate that these data are not available elsewhere. Data are available on manufactured home shipments. The shipment series, however, does not provide the data required, such as the number, sales price, and physical characteristics of manufactured homes placed for residential use.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

Only a sample (sample size = 405) of the manufactured homes shipped each month is selected for the survey. To reduce the burden for small businesses, respondents are given the opportunity to report online, by mail or telephone. The number of questions asked is limited, and the questions asked do not require any additional record-keeping burden.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If data were collected less frequently, decisions affecting policy and legislation would be made without current data or would be delayed until the data are available.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more than quarterly;**

Respondents are required to report information monthly. The data are published monthly; therefore, a quick response is requested to provide timely and accurate statistics for analyzing the housing sector of the economy.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Respondents prepare a written response to a collection of information in fewer than 30 days after receipt. The data are published monthly. Therefore, a quick response is requested to provide timely statistics for analyzing the housing sector of the economy.

- **requiring respondents to submit more than an original and two copies of any**

document; N/A

- **requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; N/A**
- **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; N/A**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB; N/A**
- **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; or N/A**
- **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. N/A**

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

- Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
- Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

HUD published a 60-Day Notice of Proposed Information Collection for the program on November 27, 2024, Docket No. FR-7090-N-09. HUD received one letter of support during the 60-day period for comments.

We consult frequently with industry experts, including the Manufactured Housing Institute (MHI), to discuss the relevance of the survey content and how best to phrase the survey questions to assist respondents and facilitate accurate collection. In 2019, we

conducted cognitive testing with a small panel of potential respondents to test proposed content changes.

HUD received one public comment in response to the November 27, 2024, 60-Day Federal Register Notice. The respondent was from the Bureau of Economic Analysis (BEA) in the Department of Commerce and their comment was in support of the Manufactured Housing Survey based on its importance to BEA functions. The BEA also requested to be informed about any future changes to the survey.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

The Census Bureau does not pay respondents nor provide gifts in return for complying with the survey.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The following statement of confidentiality is included in a letter (see Attachment 2) signed by the Director of the Census Bureau that is sent to all participants in the survey, “The Census Bureau is required by Title 13, U.S.C., § 9 to keep your information confidential and can use your responses only to produce statistics. The Census Bureau is not permitted to publicly release your responses in a way that could identify your business, organization, or institution. Per the Federal Cybersecurity Enhancement Act of 2015, your data are protected from cybersecurity risks through screening of the systems that transmit your data.”

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The survey report form contains no sensitive questions.

12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. Note: If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Manufactured Housing Survey	4,860	1	4,860	.33	1,603.80	\$36.14	\$57,961.33

The sampling unit is a manufactured home. Once a new manufactured home enters the survey, we contact the dealer or manufacturer 4 months after the shipment date. A sample of 405 new home shipments is selected each month for follow-up. The average time to complete this form is based on the monitoring of the telephone interviews and consultations with survey respondents.

An individual dealer or manufacturer may be contacted several times based on the number of homes he/she has in the sample. For respondents who receive many forms, the time required per form is less than the average since they are familiar with the report form. For new respondents, the time required would be longer.

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out

information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We do not expect respondents to incur any costs other than that of their time to respond. The estimated hourly cost per response is \$36.14, which is the hourly rate for typical respondent: Occupational code 41–4010: Sales Representatives, Wholesale and Manufacturing. The estimate total annual cost burden to respondents is \$58,547, which is not a direct financial cost of respondents' time, but rather the associated cost burden of the respondents' voluntary responses. The information requested is the type and scope normally carried in company records and no special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents are not expected to incur any capital and start-up costs or system maintenance costs in responding. Further, purchasing of outside accounting or information collection services, if performed by the respondent, is part of usual and customary business practices and not specifically required for this data collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The total estimated cost of this survey in Fiscal Year 2025 is \$456,000, all borne by the Department of Housing and Urban Development, under an Interagency Agreement with the Census Bureau to conduct the survey. The cost estimate is determined through an analysis of estimated costs for previous MHS years compared to actual costs along with adjustments for expected labor, field, computing, and other costs. Costs include costs for programming support, data collection management, data collection, statistical review, and data review and publication.

Cost Item	FY2025
Programming Support	\$51,702.00
Data Collection Management	\$18,423.00
Data Collection	\$95,924.00
Statistical Review	\$9,707.00
Data Review and Publication	\$280,244.00

Total	\$456,000.00
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15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This is an extension of a currently approved collection. There are no changes to the questionnaire. The time required to complete the survey (20 minutes) has not changed. In the last submission, total burden hours were calculated based on a rounded time to complete the survey (.33 hours rather than .33 repeating). Thus, the total burden hours are now 1,620 hours and the total burden hours in the last submission should have been 1,620 hours. The survey is still voluntary. In item 13, an estimate total respondent costs based of the labor cost of typical respondent were included that were not included in previous submissions. Changes in the cost of the survey to the Federal Government are primarily due to changes in the cost of data review and publication.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The monthly processes begin on the first or second workday of the month with the receipt of the universe file. Four months after the shipment date, a fixed sample of manufactured homes is drawn and the sampled homes are matched to dealers. Paper forms are printed and mailed out to the dealers. Data collection, via telephone follow-up, begins on the 13th workday of the month for the cases that have not been received by mail or online.

Throughout the processing month, computer edits are performed and edit failures are analyzed and resolved. After the final edits are resolved, the estimation, imputation, and tabulation processes are performed. After a final data review, publication tables are prepared and verified. Data is posted to the website at the beginning of the month following data collection.

On a monthly basis, the survey shows average sales price for manufactured homes for residential use, the total homes shipped, and by type: sold or placed for residential use, intended for sale for residential use, and for nonresidential or other use. The website for the survey is <https://www.census.gov/programs-surveys/mhs.html>.

Annual revised data are published in June of each year. In addition to the monthly-level data categories, the revised annual-level data includes average sales price by state of units sold or intended for sale and selected physical characteristics of units placed by region.

17. If you are seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date will be printed on the form.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions.