

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Survey of Construction Questionnaire for the Building Permit Official (SOC-QBPO)
OMB Control No. 0607-0125

Abstract

The U.S. Census Bureau is requesting an extension of the currently approved collection for the Survey of Construction Questionnaire for the Building Permit Official (SOC-QBPO). The information collected on the SOC-QBPO is necessary to carry out the sampling for the Survey of Housing Starts, Sales and Completions (OMB number 0607-0110), also known as the Survey of Construction (SOC). Government agencies and private companies use statistics from the SOC to monitor and evaluate the large and dynamic housing construction industry. The SOC and this collection are authorized under Title 13, United States Code, Sections 131 and 182.

The SOC-QBPO is an electronic questionnaire. The field representatives (FRs) either call or visit the respondents to enter their survey responses into a laptop computer using the Computer Assisted Personal Interviewing (CAPI) software formatted for the SOC-QBPO. The overall length of the interview will not change, and the sample size will remain the same.

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. Census Bureau is requesting an extension of the currently approved collection for the Survey of Construction Questionnaire for the Building Permit Official (SOC-QBPO). The information collected on the SOC-QBPO is necessary to carry out the sampling for the Survey of Housing Starts, Sales and Completions (OMB number 0607-0110), also known as the Survey of Construction (SOC). Government agencies and private companies use statistics from the SOC to monitor and evaluate the large and dynamic housing construction industry. The SOC and this collection are authorized under Title 13, United States Code, Sections 131 and 182.

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- 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 Census Bureau FRs use the SOC-QBPO to obtain information on the operating procedures of a permit office. This enables them to locate, classify, list, and sample building permits for residential construction. These permits are used as the basis for the sample selected for SOC. The Census Bureau also uses the information to verify and update the geographic coverage of permit offices.

Failure to collect this information would make it difficult, if not impossible, to accurately classify and sample building permits for the SOC. Data for two principal economic indicators are produced from the SOC: New Residential Construction (housing starts and housing completions) and New Residential Sales. Government agencies use these statistics to evaluate economic policy, measure progress towards the national housing goal, make policy decisions, and formulate legislation. For example, the Board of Governors of the Federal Reserve System uses data from this survey to evaluate the effect of interest rates in this interest-rate sensitive area of the economy. The Bureau of Economic Analysis (BEA) uses the data in developing the Gross Domestic Product (GDP). The private sector and other data users from Department of Housing and Urban Development (HUD) and the National Association of Home Builders (NAHB) use the information for estimating the demand for housing, building materials and the many products used in new housing and to schedule production, distribution, and sales efforts. The financial community uses the data to estimate the demand for short-term (construction loans) and long-term (mortgages) borrowing.

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. 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.**

FRs collect the data using CAPI either by phone or in person. If a respondent cannot be reached by phone, the FR will visit the permit office. FRs will provide a printed version of the questionnaire in addition to an introductory letter to new respondents to document the questions that are asked in the interview and to provide the expiration date of the Office of Management and Budget (OMB) approval of the survey. See Attachments A and B.

- 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 Question 2.**

Some duplication exists between the SOC-QBPO and the Form C-411, "Survey of Residential Building or Zoning Permit Systems" (OMB number 0607-0350). The questions related to

geographic coverage of the permit jurisdiction are similar to questions on the C-411 form.

The C-411 form provides limited information to maintain the universe for the Building Permits Survey (OMB number 0607-0094) and the SOC. The Census Bureau uses the C-411 to obtain information from state and local building permit officials about changes to legal requirements for issuing building or zoning permits in the local jurisdictions, identify new permit-issuing jurisdictions, and to verify geographic coverage. The C-411 historically has been sent every five to ten years to non-permit issuing jurisdictions or when we have reason to believe that changes to permit systems have occurred. In addition to questions about geographic coverage, Form SOC-QBPO asks about the classification of permits for various types of residential buildings, the procedures for permit expiration and the issuance of extensions, the filing system for the permit office, and the availability of the records. This information is all necessary to accurately carry out the sampling of permits for the SOC. In general, the C-411 collection targets non-permit issuing jurisdictions to determine if they started issuing permits since the last C-411 collection. The SOC-QBPO collection targets existing permit issuing jurisdictions in the SOC sample to ensure correct classification and availability of their permits. Some overlap is possible if the permit issuing jurisdiction changes their geographic coverage or that coverage needs to be verified.

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

Information is collected for 1,000, or 5.0 percent, of the approximately 20,000 permit-issuing places. Furthermore, interviews are conducted only when the place is initially selected for the SOC sample and, thereafter, whenever the permit official or office procedures change, usually once a year.

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.

Less frequent interviewing would jeopardize the SOC sampling process and accuracy of the statistics that are produced.

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 often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract,**

grant-in- aid, or tax records for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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
- 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.

The collection of these data is consistent with each of the Office of Management and Budget (OMB) guidelines above.

8. If applicable, provide a copy and identify the date and page number of publications 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.

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 may preclude consultation in a specific situation. These circumstances should be explained.

We regularly consult with data users outside the agency to obtain comments regarding the current SOC questionnaire, which uses the SOC-QBPO to carry out the sampling. Consultations with outside consultants were for the purpose of receiving individual opinions and not for the purpose of forming a group opinion. The Census Bureau communicates regularly with survey sponsors from HUD and key data users including the National Association of Home Builders, BEA, and Harvard University Joint Center for Housing Studies, who provide feedback regarding the SOC.

On June 27, 2025, we published a notice in the Federal Register (Volume 90, No. 122, Pg. 27526) inviting public comments on our plans to submit this request. In response to the notice, we received a letter of support from the BEA (see Attachment C). We thank the BEA for its continued support of this program.

We also received two comments related to ongoing research into the use of satellite imagery for the SOC and how this overlaps with similar efforts for other Census programs (see Attachment D & E). While multiple Census programs are exploring how to leverage satellite imagery as a new data source, the primary goal for SOC (i.e. measuring monthly housing starts) presents unique

requirements for image acquisition. First, detecting the earliest stages of construction using satellite imagery and computer vision currently requires relatively high resolution imagery. Second, in order for this technique to eventually support the release cadence of the current housing starts indicator (New Residential Construction), imagery must be acquired monthly and no later than 5 days after the end of each month. The combined requirements of high-frequency, high-resolution, and nearreal-time image acquisition make the SOC effort unique compared with other satellite imagery efforts at Census that are able to leverage less-frequent and/or lower-resolution images. We continuously collaborate with other programs areas within Census and at other agencies to ensure we minimize duplication of effort and maximize the sharing of resources where possible. We encourage those interested in this effort to review our experimental data product, "Single-family Housing Starts Using Satellite Imagery" - found here: <https://www.census.gov/data/experimental-data-products/single-familyhousing-satellite-imagery.html>

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

The Census Bureau does not pay respondents or provide gifts in return for complying with the survey.

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

The information collected on the SOC-QPBO is not confidential. The letter provided to each respondent and the CAPI QBPO introduction FR script includes a statement, which indicates that the survey is voluntary and that no assurance of confidentiality is offered. See Attachment B.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 SOC-QPBO contains no sensitive questions.

12. Provide estimates of the hour burden of the collection of information.

- **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.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government' (Item #14).

Reporting burden is calculated as follows:

Frequency	Total Respondents	Responses per Respondent	Total Annual Responses	Avg. Burden Hour per Response	Total Burden (hours)
Annual	1,000	1	1,000	.25	250

There are 1,000 respondents contacted once a year. Based on our experience and information from the respondents, we estimate that the average time to complete an interview is 15 minutes, resulting in a total annual response burden of 250 hours.

- 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).**

We do not expect respondents to incur any costs other than that of their time to respond. The information requested is the type and scope normally carried in office 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. Furthermore, 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 information 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.**

The total cost in Fiscal Year 2025 for the Survey of Construction program of which this questionnaire is a part is estimated to be \$10.4 million. Of this amount, \$5.2 million is borne by the Department of Housing and Urban Development, and \$5.2 million is borne by the Census Bureau.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

There is no change in the estimated number of burden hours from the previous submission.

16. For collections 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.

Information collected is used to execute SOC sampling and is not tabulated or published.

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

We will continue to display the expiration date on the reference version of the questionnaire mailed to each respondent. See Attachment A.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).