

Supporting Statement
Form C-MH-9A
Survey of New Manufactured (Mobile) Home Placements

A. Justification

1. Necessity of Information Collection

The U.S. Census Bureau is requesting an extension of a currently approved collection for the Survey of New Manufactured (Mobile) Home Placement (Form C-MH-9A). Manufactured (Mobile) homes provide much of the low-cost new housing in the United States. In 2008, approximately 79,300 new units were placed for residential use, about ten 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, which provides 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 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.

In the "National Manufactured Housing Construction and Safety Standards Act of 1974," 42 United States Code (U.S.C.) 5401 (see Attachment 1), 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 III, questions 5 and 6 of Form C-MH-9A (see Attachment 2). HUD also uses these statistics to respond to a Congressional mandate in the "Housing and Community Development Act of 1980," Title 42 U.S.C. 5424 (see Attachment 3), which requires 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., Section 8(b) (see Attachment 4) and Title 12, U.S.C., Section 1701z-1 (see Attachment 5).

Furthermore, the Survey of Manufactured (Mobile) Home Placements serves as the 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 attachment 6). This index is 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. HUD implemented the revised loan limits for all manufactured home loans for which applications are

received on or after March 3, 2009 (see attachment 7).

2. Needs and Uses

The Bureau of Economic Analysis uses the data as an input to the estimates of residential fixed investment.

The HUD's Office of Economic Affairs uses these data to monitor total new housing production and its affordability. The 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.

3. Use of Information Technology

Information received is based on data collected by telephone interview from dealers that have received sampled homes. The survey was recently migrated to the Standard Economic Processing System (StEPS). StEPS is the Census Bureau's generalized data collection/processing system developed for numerous economic surveys. StEPS utilizes SAS® and operates in the LINUX environment.

4. Efforts to Identify Duplication

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. Minimizing Burden

To reduce respondent burden, a sample of approximately 4.0 percent of the manufactured homes produced monthly is selected for the survey. To reduce the burden for small businesses, the interview is conducted by telephone, the number of questions asked is limited, and the questions asked do not require any additional record-keeping burden.

6. Consequences of Less Frequent Collection

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. Special Circumstances

The collection of these data is consistent with the OMB guidelines with the exception of requiring respondent to report information to the agency more often than quarterly and to prepare a written response to a collection of information in fewer than 30 days after receipt. This monthly survey data are published with two economic indicators, Housing Starts and Building Permits. Therefore, a quick response is requested to provide timely statistics for analyzing the housing sector of the economy.

8. Consultations Outside the Agency

Consultations were conducted with the companies listed below concerning their views on the availability of data and reporting format. (See Attachment 8 for copies of the consultations.)

- a. Miller Mobile Home
1818 Pepperell Pkwy
Opelika, AL 36801
334-749-0401
Contact: Gary
- b. Wayne Frier Homes
5311 Montgomery Hwy
Dothan, AL 36303
334-983-4544
Contact: Margaret
- c. Worldwide Mobile Homes
PO Box 8570
Lumberton, TX 77657
409-755-7595
Contact: Bobbie
- d. Hamilton Home Center
800 S Hughes
Hamilton, MO 64644
816-583-2177
Contact: Theresa
- e. Classic Sales & Service
3524 Hwy 61 South
Vicksburg, MS 39180
601-636-6433
Contact: Harriet

- f. Charlie Taylor Housing
1326 S Water Street
Gallatin, TN 37066
615-230-1904
Contact: Charlie

The respondents stated that the information was readily available, and that the questions were easy to understand.

In September 2009, we published a notice in the Federal Register (see Attachment 9) inviting public comments on our plans to submit this request. We received no comments during the 60-day comment period.

9. Paying Respondents

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

10. Assurance for Confidentiality

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, “Your voluntary report to the Census Bureau is confidential by law (Title 13, United States Code). It may be seen only by persons sworn to uphold the confidentiality of Census Bureau information and may be used only for statistical purposes. The law also provides that copies retained in your files are immune from legal process.”

11. Justification for Sensitive Questions

The survey report form contains no sensitive questions.

12. Estimate of Hour Burden

Frequency	Number of Manufactured	Average Time	Burden Hours
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	Homes	to Complete	
Monthly	4,800	30 mins	2,400

The sampling unit is a manufactured home. Once a new manufactured home enters the survey, we contact the dealer or manufacturer each month until the home is placed. At the beginning of the year, we start with approximately 1,200 homes in inventory and we add about 300 new homes each month for a total of 4,800 homes a year. 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.

Based on information available from the Department of Labor, Bureau of Labor Statistics, National Compensation Survey, Occupational Wages in the United States: 2008, we estimated the average hourly pay for respondents to be \$21.63. Therefore, the total cost to the respondents is \$51,912.

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 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 information collection.

14. Cost to the Federal Government

The total estimated cost of this survey in fiscal year 2009 is \$1,116,000, all borne by the Department of Housing and Urban Development.

15. Reasons for Change in Burden

The burden was reduced due to the decrease in the sample size. Reduction in sample size is due to a decline in the number of manufactured homes that are being shipped.

16. Project Schedule

The published statistics obtained from this survey show the number of new homes

placed for residential use, the average sales price of these manufactured homes, and the inventory on dealers' lots at the end of the period. These statistics are published monthly on the Internet. The website address is <http://www.census.gov/const/www/mhsindex.html>. Annual data are published showing new manufactured homes placed for residential use by state, average sales price by state and selected physical characteristics by region on the Internet. The data from the survey are collected during the third week of the second month following the survey month in which the manufactured home was reported shipped to the dealer. The forms are coded, edited, and processed during the following week. A computer edit is produced at the end of the month, problems are resolved, and tabulations are produced. The results are analyzed and the statistics are prepared for publication on the Internet. Annual data are normally published in May following the survey year.

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.

B. Collection of Information Employing Statistical Methods

1. Universe, Respondent Selection, and Response Rates

Data are collected monthly from a sample of manufactured homes shipped to dealers. About 4.0 percent of the roughly 6,800 homes manufactured each month are randomly selected for the survey. A list of all manufactured homes is provided by manufacturers to the Institute of Building Technology and Safety (IBTS). The list identifies the home and shows the name, city, and state of the dealership that ordered it. Under contract, the Census Bureau obtains copies of these lists from IBTS on a monthly basis. The Form C-MH-9A imprinted with a letter signed by the Director of the Census Bureau, (see Attachment 2) explaining the survey and identifying the home, is mailed to the manufactured home dealer shown as the receiver of the sampled home.

The dealer is asked to have the answers to the questions available when the interviewer telephones for the information. The current response rate is approximately 85 percent.

2. Statistical Methodology - Estimation Procedures

Each sampled home is weighted by its probability of selection. The average relative standard error of monthly 2008 estimates of placements is 6 percent for the United States and approximately 16 percent at the regional level.

3. Methods to Maximize Response

Telephone follow-ups are used to reduce nonresponse.

4. Testing of Procedures

There are no tests of procedures or methods currently planned.

5. Contacts

The Manufacturing and Construction Division staff plans and coordinates the survey. This includes the design of the reporting form, sample design and selection, collection, tabulation, analysis, and publication.

The contact person for questions relating to the statistical aspects of the survey is Ms. Amy Newman-Smith. She can be reached on 301-763-6595. The contact person for questions relating to the collection and analysis of the data is Mr. Michael Davis. He can be reached on 301-763-4590.

Attachments:

1. 42, U.S.C. 5401, TITLE VI
2. Survey Form and Letter - C-MH-9A
3. Title 42, U.S.C. 5424 note,
4. Title 13, U.S.C., Section 8(b)
5. Title 12, U.S.C., Section 1701z-1
6. Housing and Economic Recovery Act (HERA) of 2008, Section 2145
7. U.S. Department of Housing and Urban Development: Letter TI-480
8. Comments from Consultations
9. Federal Register Notice