

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. Census Bureau 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 2017, nearly 93,000 new units were shipped from manufacturing plants to local dealers, with the majority of these homes intended for residential use. These homes make up 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. 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 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 IV, questions 4 and 5 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 MHS 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. 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 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.

The Census Bureau also uses the data in the formulation of annual population estimates.

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 from 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 (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

Out of all the manufactured homes shipped each month, only a sample of 405 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. 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;**
- **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 than 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 the OMB guidelines with the exception of requiring respondents 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. The data are published monthly. Therefore, a quick response is requested to provide timely statistics for analyzing the housing sector of the economy.

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320 (Controlling Paperwork Burdens on the Public). There are no special circumstances that require deviation from these guidelines.

- Under this ICR, HUD will not conduct any data collection requiring respondents to report information to the agency more often than quarterly;
- Under this ICR, HUD will not conduct any data collection requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit more than an original and two copies of any document;
- Under this ICR, HUD will not conduct any data collection requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- Under this ICR, HUD will not conduct any data collection 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;
- Under this ICR, HUD will not conduct any data collection requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- Under this ICR, HUD will not conduct any data collection 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
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit proprietary trade secrets, 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.

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.

- **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.**

On November 26, 2018, a 60-Day Federal Register Notice of Proposed Information Collection: Manufactured Housing Survey was published at Volume 83 FR 60443, No. 227 (see Attachment 8) inviting public comments on our plans to submit this request. A letter of support was received from the Bureau of Economic Analysis (see attachment 9) and comments on suggested question wording changes were received from the Manufactured Housing Institute (see attachment 10). HUD and Census will evaluate proposed question wording changes in 2019 and HUD will determine whether changes should be made to the questionnaire in 2020. HUD has responded to the Bureau of Economic Analysis and the Manufactured Housing Institute and will seek their input as the questions are evaluated.

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.**

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., Section 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.**

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.

All assumptions are reflected in the table below.

| 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 | 4,860.00 | 1.00 | 4,860.00 | 0.33 | 1,603.80 | \$0.00 | \$0.00 |
| Total | 4,860.00 | -- | -- | -- | 1,603.80 | -- | \$0.00 |

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 labor cost (wage equivalent) of the burden-hours described in item 13 above. The information required here corresponds to that in item 14 on the 83-I (cost to the public).**

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 data collection.

14. Provide estimates of annualized cost to the Federal government.

The total estimated cost of this survey in Fiscal Year 2019 is \$420,000, all borne by the Department of Housing and Urban Development, under an Interagency Agreement with the Census Bureau to conduct the survey. The costs include costs for programming support, data collection management, data collection, statistical review, and data review and publication.

| Cost Item | FY2019 |
|-----------------------------|---------------|
| Programming Support | \$24,030.00 |
| Data Collection Management | \$34,116.00 |
| Data Collection | \$90,000.00 |
| Statistical Review | \$42,729.00 |
| Data Review and Publication | \$229,125.00 |
| Total | \$420,000.00 |

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

The request is a revision of a currently approved data collection with no changes to the Manufactured Housing Survey instrument since 2015. The revision is a reduction in the burden hours per response from .5 hours to .33 hours as a result of the implementation of changes introduced in the 2014 MHS redesign.

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 12th workday of the month for the cases that have not been received by mail in or online reporting.

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 and 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 and selected physical characteristics of units placed and sold 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 for OMB approval will be displayed on any forms completed as part of the data collection.

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

No exceptions are necessary for this information collection.
