



REGULATORY & HOUSING POLICY AREA

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Senior Staff Vice President

June 25, 2008

Brian Harris-Kojetin
OMB Desk Officer
(bharrisk@omb.eop.gov)

Subject: Submission for OMB Review; Comment Request: The American Community Survey.

Dear Mr. Harris-Kojetin:

Pursuant to the notice published in the May 28, 2008 *Federal Register* (73 Fed. Reg. 30602), the National Association of Home Builders (NAHB) would like to take this opportunity to comment on the information collection proposed by the Department of Commerce for the American Community Survey (ACS).

The National Association of Home Builders is a Washington-based trade association representing more than 235,000 members involved in all aspects of home building. NAHB is affiliated with more than 800 state and local home builders associations across the country with a particular interest in the data produced by the ACS for particular states and localities.

ACS data are produced on an annual basis and include key demographic, social, economic, and housing information. As such, the ACS has assumed a central role in serving the data needs of federal agencies, as well those of state and local jurisdictions, which are striving to manage a wide variety of social, economic, and statistical programs. For example, the Department of Housing and Urban Development relies on ACS data to calculate income limits that are used to establish eligibility for virtually all U.S. housing programs. NAHB regularly distributes ACS tabulations to federal legislators and staff in order to illustrate housing and economic conditions in particular Congressional districts. Such tabulations would not be possible without the ACS, which is one of the few data sources that produces information by Congressional district.

ACS data are also needed by private industry in order to make informed business decisions. Academic and other research organizations rely on ACS data products for a wide range of significant analytic projects.

NAHB frequently uses data from the ACS to provide basic information on housing markets to its members, and to analyze current and proposed policies at the federal, state, and local level. Examples of specific ACS-based analyses conducted by NAHB include the following special studies published in *Housing Economics*

<http://www.nahb.org/category.aspx?sectionID=734&channelID=311> :

- Immigrant Workers in Construction (December 2005)
- Residential Construction Workers Across States and Congressional Districts (October 2006)
- Residential Real Estate Tax Rates in the American Community Survey (May 2007)
- New Home Prices by State and Metro Areas (June 2007)
- Metro Area House Prices and Affordability (July 2007)
- Local Vacancy Rates in Government Databases (October 2007)

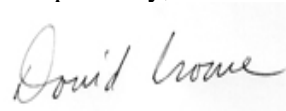
Again, it would not have been possible to produce these studies without access to ACS data.

NAHB believes that the modifications proposed by the Department of Commerce for the 2009 ACS will clearly enhance the utility of the survey. The proposed reinstatement of the 'duration of vacancy' question promises to be particularly significant in the current environment, when many housing markets across the country are experiencing downturns, and local jurisdictions are seeking information on the nature of housing vacancies in their areas. In the past, NAHB has worked directly with the Census Bureau within the Department of Commerce to improve the quantity and quality of housing-related data produced by the ACS. The Census Bureau has a good track record of communicating with private sector stakeholders and accepting input from them when considering such issues.

In summary, the ACS provides key data at a level of geographic detail that is available from no other source. The estimated burden on respondents reported in the above-referenced *Federal Register* notice seems reasonably accurate, and the utility of the data the ACS produces easily justifies the cost. Moreover, the ACS was introduced as a replacement for the decennial Census long form and therefore needs to be continued, because there is no plan in place to collect long-form information as part of the 2010 Census, and it would be too late at this stage to introduce such a plan. For these reasons, NAHB strongly supports the ACS and urges the Office of Management and Budget to authorize its continuation, as requested by the Department of Commerce in the May 28 notice.

If you have any questions about NAHB's comments, please contact Paul Emrath, NAHB's Assistant Staff Vice President of Housing Policy Research (202-266-8449, pemrath@nahb.com).

Respectfully,



David A. Crowe
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