November 4, 2024

The Honorable Adrianne Todman
Agency Head
Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410

RE: Manufactured Housing Institute Comments on Notice of Proposed Information Collection: American Housing Survey (Docket No. FR–7090–N–07)

Dear Agency Head Todman,

The Manufactured Housing Institute (MHI) is pleased to provide feedback to the Notice of Proposed Information Collection on the American Housing Survey.

MHI is the only national trade association that represents every segment of the factory-built housing industry. Our members include builders, suppliers, retail sellers, lenders, installers, community owners, community managers, and others who serve our industry, as well as 48 affiliated state organizations. Our industry is on track to build more than 100,000 homes this year, accounting for approximately 9 percent of new single-family home starts. These homes are produced by 38 U.S. corporations in 152 homebuilding facilities located across the country. Today, MHI members represent over 90 percent of all manufactured homes constructed and we are pleased to submit the following comments on behalf of this important industry.

Manufactured housing is the most affordable homeownership option for American families. Last year, the price for an average manufactured home was $124,300, while the average site-built home was around $409,000 (excluding land). The average income for a manufactured home buyer was about $61,000 while the average income for a site-built home buyer was over $136,000.

HUD is seeking comments on changes to the way it collects housing data under the American Housing Survey (AHS). Specifically, HUD is proposing to replace its current periodic 5-month data collection every two years with a continuous data collection model.

MHI writes to support this change in data collection.

MHI collects and analyzes information to produce research publications on a near real-time basis. MHI relies on reliable up-to-date information to do so. Therefore, a continuous data collection process would be more accurate and improve MHI's capabilities in this area.

Regarding the interval for release of data, MHI assumes HUD will release the data annually and even monthly. However, clarification on this point would be helpful.

There are other reasons why HUD's proposed change makes sense.

First, AHS data is critical because the housing industry is vital to the U.S. economy. There are over than 145.3 million housing units in the United States, so by its very nature these statistics are vital to understanding the economy.

Second, HUD continuous data collection model would benefit other stakeholders that use ACS data with other government statistics more effectively. Government agencies and industry organizations produce information on a high-frequency basis. For example,

1. Bureau of Labor Statistics (BLS) produces the Consumer Price Index (CPI), a measure of cost of living, on a monthly basis. Housing is one of the eight major components in the Index, and accounts for more than 1/3 of the BLS's CPI.

2. The Census Bureau, in collaboration with multiple federal agencies, utilizes a continuous data collection method to conduct its Household Pulse Survey to produce data on critical social and economic matters affecting American households. Data is designed to be disseminated in near real-time to inform federal and state action.

3. On a monthly basis, the Census Bureau releases New Residential Construction, new Residential Sales, Revised Building Permits, and Construction Price Indexes.

4. On an annual basis, the Census Bureau generates data from other surveys such as American Community Survey (ACS) to inform the public about the changes in U.S. communities. Housing is one of the major topics in the ACS.

Finally, the HUD continuous data collection model would improve data accuracy and reduce stakeholders' estimating errors. It would improve the performance of stakeholders. It would also enhance the capability of federal housing policy makers – in Congress and in other federal agencies – to formulate and adopt policies based on the most current housing information.

For example, the AHS provides the occupancy and vacancy status of housing units in the U.S. on the national, state, and metro area levels. Since the data is not available on a high-frequency level, a common practice for analysts is to utilize different statistical methods to extrapolate and estimate the values between survey releases. Since occupancies and vacancies are constantly changing resulting from many factors, significant estimation errors are inevitable.

In closing, we appreciate the opportunity to comment and support HUD's proposed changes.

Sincerely,

Lesli Gooch

Lesli Gooch, Ph.D.
Chief Executive Officer