

**Supporting Statement for Paperwork Reduction Act Submission  
2025 American Housing Survey  
OMB Number 2528-0017**

**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.**

We request clearance for the proposed questions to be used on the 2025 American Housing Survey (AHS). We will collect data for most of the sample between May 1<sup>st</sup>, 2025, and December 31<sup>st</sup>, 2026. This request is a revision to the currently approved data collection request for the AHS under OMB Number 2528-0017.

This information collection request (ICR) includes the following supporting documents as attachments:

- Attachment 1: 2025 AHS Sample Design and Weighting Supplement
- Attachment 2: 2025 AHS Reinterview Items
- Attachment 3: 2025 AHS Metropolitan Selection Process
- Attachment 4: Authorizing statute (Title 12)
- Attachment 5: 2025 AHS Items Booklet [09272024](#)
- Attachment 6: 60 Day Federal Register Notice
- Attachment 7: 2025 AHS Contact Letters

Increasing field costs and declining response rates have led HUD to adopt a continuous data collection model as opposed to the periodic 5-month data collection every other year. HUD believes continuous data collection will be more effective, primarily because: 1) it eliminates the expensive, time-consuming Regional Office AHS ramp-up costs every two years, and 2) it puts in place a more experienced AHS workforce with a constant workload. An added benefit is that we will be able to increase the frequency of national and metro AHS estimates, allowing for more current estimates and better comparability to other data sources which collect annual data (surveys such as the American Community Survey and key estimates such as homeownership/vacancy rates). The survey will continue to be longitudinal, interviewing the same housing unit every two years. The sample will be divided into 12 cohorts where each cohort has a 2-month data collection period. The 2025 AHS Sample Design and Weighting Supplement is included as Attachment 1 to this ICR.

The 2025 survey will begin a new longitudinal sample consisting of approximately 175,000 housing units. The sample is designed to provide estimates for twenty metropolitan areas and at least seventeen states. An oversample of HUD-assisted housing units is included in the sample design. For the first survey cycle (2025-26) a bridge sample will be fielded. The

bridge sample will be drawn from housing units that were successfully interviewed in 2023. The bridge sample serves as an evaluation tool. If something unforeseen were to happen with the 2025 sample, the estimates from the bridge sample can measure what the 2025 estimates would have looked like if we had not redesigned the AHS sample. The bridge sample size will be 8,500. Approximately seven percent of all interviews will be reinterviewed for the purpose of interviewer quality control (an estimated total of 12,845 housing units). The 2025 AHS Reinterview Items are included as Attachment 2.

Attachment 3, entitled “2025 AHS Metropolitan Selection Process” describes the impact of sample design changes on the choice of metropolitan areas for which the 2025 AHS will produce representative estimates.

Starting in 2009, the AHS questions were classified into “core” modules and “supplemental” modules to minimize respondent burden and satisfy widening needs for data content. Questions in the core modules are asked in each survey and typically undergo minor revisions between surveys. Questions in the supplemental modules are asked on a supplemental basis.

Title 12, United States Code, Sections 1701z-1, 1701z-2(g), and 1701z-10a provides authority to collect this information and is included as Attachment 4.

HUD uses information from the AHS to prepare the *Worst Case Needs* reports to Congress. HUD was directed to prepare this report series by the U.S. Senate Appropriations Committee in 1990 (Committee Report to accompany H.R. 5158, The VA-HUD Appropriations Act for FY 1991 (S. Rpt. 101-474)). HUD also uses these data to prepare other special reports for Congress and its committees concerning the effect of legislation on the housing stock.

The 2025 data collection procedures and questionnaire content (the 2025 AHS Items Booklet is included as Attachment 5) are similar to the 2023 survey with the following exceptions:

a. New data in the Core Questionnaire:

New data will be collected in the 2025 AHS core questionnaire with proposed questions about income (including non-relative income, real estate transactions, taxes and fees, home improvement, and recent movers).

**Income/Nonrelative Income:** To better measure household income and alleviate field issues with data collection, the AHS will ask the same income questions directly to all household members aged 16 and older, regardless of relationship to householder. Proxy responses will be collected for respondents over the age of 16 who are currently working and respondents unable to answer at the time of the interview.

**Real Estate Transactions:** Made several updates data collected for vacant units to better capture year-round and seasonal vacancies and streamline the questions. Updated questions on why and how the respondent acquired their housing unit, including added

two questions about if the home was received as a gift or inheritance. Updated field representative (FR) instructions to improve respondent comprehension of down payment questions and added a new question on other arrangements for purchasing the home besides providing a downpayment.

Home Improvement: Revised a question on the main source of funding for home improvement jobs to “mark-all” sources of funding the job. Added a new question on the cost of solar panels for homes reported to have solar panels. Added questions on the reason for energy efficient improvements, receipt of federal, state, or local tax incentives for making energy efficient improvements or appliance purchases, and receipt of financial incentives from a utility company for making energy efficient improvements or appliance purchases.

Taxes and Fees: Revised FR instructions for question on how much the respondent pays for rent to specify the respondent should only report the amount the household pays out of pocket, and to not include any amount paid by government assistance or for parking.

Recent Movers: Questions on the search process for a new home were dropped because responses needed to be suppressed for publicly released data and tables. These included three questions on the search process, including a question on if the household “had to move quickly,” if “difficulty with travel” had been an issue with the search, and if the search ended sooner than the household would have liked. Questions on if the respondent found the current unit via newspaper or other publication and if the unit was found through an apartment rental agency listing were also dropped because of suppression. Two new questions were added to the yes/no series of question on why the respondent moved to the new residence. These included did you choose to move to avoid natural disasters, and did you choose to move to be closer to public transportation.

Language spoken at home: Two questions were added on English language proficiency and language spoken at home.

- b. Removal of Six Supplemental Modules from the 2023 AHS: The AHS design includes the inclusion of rotating supplemental topical modules to meet HUD’s needs for new topical content without increasing respondent burden. This approach was recommended by the National Research Council’s 2008 report [Rebuilding the Research Capacity at HUD](#) [The National Academies Press]. With this approach, topical modules from the previous year of the AHS are removed and replaced with new content. For this reason, the Power Outage, Heat Risk, Healthy Homes, Housing Insecurity, Urbanization, and First-Generation Owners supplemental modules will not be included in the 2025 survey.
- c. Reinstatement of Home Accessibility and Arts and Culture Supplemental Modules: The Arts and Culture module, last fielded in 2015, will be administered to half of the sample. The Home Accessibility module, last fielded in 2019, will be administered to the full sample.

- d. Introduction of Three New Supplemental Modules: To continue the strategy of supplemental modules to minimize respondent burden and satisfy widening needs for data content, three new supplemental modules have been added to the survey – Climate Risk and Insurance, Accessory Dwelling Units, and Housing Costs Roster. These modules collect data on the prevalence of climate risks, adaption to climate risks, and insurance, the prevalence of accessory dwelling units, and contributions of household members to rent/mortgage and utilities payments. Please refer to Section 2 (Needs and Uses) for more information on these modules and to the attached items booklet for the specific questions in these modules and the rest of the AHS questionnaire.

- e. Demographic Questions on Sexual Orientation and Gender Identity: Sexual Orientation and Gender Identity (SOGI) Self-Report Questions will be asked of all adult respondents. Two variations of gender identity questions will be administered both halves of the AHS split sample. Wording variations for gender identities are informed by wording in the 2024 American Community Survey (ACS) SOGI Content Test.

- f. Test of Proxy Questions on Sexual Orientation and Gender Identity: The respondent will be asked Sexual Orientation and Gender Identity (SOGI) Proxy Questions for all adult household members in 2023 AHS sample to test item nonresponse. Two variations of gender identity questions will be administered both halves of the AHS split sample. Wording variations for gender identities are informed by wording in the 2024 American Community Survey (ACS) SOGI Content Test.

The test is part of a wider series of research projects evaluating SOGI proxy data collection approaches and the accuracy of SOGI proxy measurement in the American Housing Survey and the American Community Survey. These research projects are discussed in Section 2C on Supplemental Module Needs and Uses.

- g. Sample Split for Supplemental Modules: A split of the survey sample will be used to maximize the number of supplemental modules that can be included in the 2025 AHS. Fifty percent of the sample will be asked the ADU module and fifty percent will be asked the Arts and Culture module. Gender identity question variations will be implemented in each half of the AHS sample for adult respondents and adult household members.

We also request clearance for the reinterview questions to be used in conjunction with this survey. We will conduct a second interview at approximately 7 percent of the total addresses in the survey for the purpose of interviewer quality control. Reinterview questions ask respondents whether they recall general details from the original interview. The 2025 reinterview instrument will contain five questions about the AHS questionnaire. Each respondent will be asked all five questions. We included in this clearance the cost and respondent burden estimates for the reinterview.

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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.**

Both HUD and outside entities use the core modules of the AHS extensively. The core modules capture information about building and unit characteristics, housing quality, fuel and electricity costs, resident mobility and recent movers, rent and mortgage expenses, household demographic characteristics, income, and repairs and remodeling frequency and expenses. The following subsections describe the internal and external uses of the core modules and expected uses of the supplemental modules.

a. HUD's Internal Needs for the Core Modules

HUD has numerous needs for the AHS to support Congressional reporting requirements, programmatic needs, and ongoing research.

The needs include, but are not limited to:

1. Worst Case Housing Needs: Congress requires HUD to produce the Worst Case Housing Needs report every two years. This report is based almost entirely on the AHS.
2. Worst Case Housing Needs of People with Disabilities: HUD produces a supplemental report to the Worst Case Housing Needs report providing national estimates and information on the critical housing problems that confront low income renting families, including people with disabilities.
3. Characteristics of HUD Assisted Renters and Their Units: HUD produces a report detailing the housing conditions of HUD-assisted renters. This report is based entirely on the AHS responses of units that match to HUD administrative records of subsidized housing.
4. Housing Program Monitoring: AHS data is used to evaluate, monitor, and design HUD programs to improve efficiency and effectiveness. From a HUD policy perspective, the AHS data have proved valuable in analyzing the potential effects of program design and redesign proposals. Past data have enabled HUD, for instance, to determine the conditions under which a moderate income, multifamily construction program might be needed and feasible; to examine the effect of low vacancy rates on housing maintenance and quality; and to evaluate how housing assistance programs help welfare recipients.
5. National Housing Market Program of Research: HUD's Office of Policy Development and Research (PD&R) continuously monitors the state of the nation's

housing market. The AHS contributes to this effort by providing estimates of vacancy, financing types, homeowner equity, and housing values, to name a few.

6. Regional and Local Housing Market Research: HUD PD&R uses the AHS data as one source of data for creating Comprehensive Housing Market Analyses and other local housing market intelligence reports. These reports help HUD field economists evaluate feasibility and market impacts of proposed multifamily assisted housing project investments.
7. Affordable Housing Program of Research: HUD PD&R uses the AHS to conduct research on the number of affordable rental units in the housing stock and the degree to which rents are affordable to low- and moderate-income families and to very-low-income families.
8. Housing and Demographics Program of Research: HUD PD&R uses the AHS to conduct research on demographic distributions by types of housing units. Of particular interest are housing choices by low-income female householders, minorities, first-time homebuyers, the elderly, and households nearing retirement.

b. Core Modules Uses External to HUD

Policy analysts, program managers, budget analysts, and Congressional staff use data from the AHS to advise executive and legislative branches about housing conditions and the suitability of policy initiatives. Academic researchers and private organizations also use the AHS data in efforts of specific interest and concern to their respective communities.

Data from the AHS is the major source of estimates of the space-rental value of housing (a component of personal consumption expenditures) and of the rental income of persons (a component of both personal income and national income). The Bureau of Economic Analysis (BEA) uses the AHS data in preparing metropolitan income and product accounts. The specific data that the BEA uses are those defining farm or nonfarm location, type of housing unit, occupancy status, tenure of the occupant, and the expenditures related to housing (rent, utilities, mortgage, and so on). Another use of AHS data is to evaluate the housing program benefits reported on the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). The Energy Information Administration (EIA) of the Department of Energy issues an annual report "Annual Energy Review" using the heating fuel data collected in AHS (<http://www.eia.gov/totalenergy/data/annual/>).

Data from the AHS are the primary input into Harvard's Joint Center for Housing Studies estimate of the size of the remodeling market (<http://www.jchs.harvard.edu/research/remodeling-futures>).

c. Supplemental Module Needs and Potential Uses

New data are being collected in the 2025 survey on Climate Risk and Insurance, Accessory Dwelling Units, Home Accessibility, Arts and Culture, and Housing Costs Roster. We will collect this data in the following five modules.

1. Climate Risk and Insurance – The proposed Climate Risk and Insurance module will collect data on damage to home from natural disasters, climate driven mitigation efforts, and insurance. A question in the module asks if the home, in the last 12 months, has experienced significant damage from a flood caused by weather or natural disaster. Two additional questions are asked on if the home is elevated to reduce the risk of flooding and if the home is protected by a berm. Additional questions ask if the respondent’s homeowner’s insurance covers the full rebuilding and replacement cost of the home and if the insurance covers wildfire risk. The module then asks about supplemental insurance, and separate questions on supplemental insurance for wildfire risk, flood, and wind and/or hail. The insurance questions are rounded out with questions on lapses in insurance, and the reasons for those lapses. The module ends with two questions about electrical outlets, and outlets for charging electrical vehicles.
2. Accessory Dwelling Units – The proposed Accessory Dwelling Module intends to estimate the prevalence of properties with an ADU, if the ADU is being rented or is intended for rent, and if the ADU has a separate mailing address from the primary unit. ADUs are growing in popularity and present an opportunity for creating more affordable housing. However, permit rules for ADUs vary greatly across localities and many ADUs were built without permits. Getting an initial estimate of the number of ADUs that are currently being rented or have the potential to be rented is a first step toward better understanding if and how ADUs can be used to provide more affordable housing to underserved groups.
3. Home Accessibility - This module includes questions on modifications made to homes that affect the accessibility of housing features to the disabled and the elderly.
4. Arts and Culture - This module includes questions developed by the National Endowment for the Arts that are designed to determine access to and use of cultural amenities in a respondent’s neighborhood.
5. Housing Costs Roster – This question will determine which household members (16 years old and older) are contributing to the rent/mortgage or utilities payments.

Finally, information quality assessment 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 assurance 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. **Use of Information Technology** 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.

a. Data Collection

The U.S. Census Bureau began conducting all the AHS interviewing with computers with the 1997 AHS enumeration. A Census Bureau Field Representative (FR) conducts the interview via a Blaise Computer Assisted Person Interview (CAPI) instrument. The same survey instrument is used for all interviews. However, the instrument code includes skip patterns and makes use of dependent interviewing techniques, which means that a few questions will not have to be asked in future enumerations to decrease respondent burden for households in sample.

The AHS has not collected data via the Internet or through the Electronic Data Interchange because of the significant investment in time and research needed to establish these types of electronic reporting in an ongoing survey. However, the Census Bureau has plans to use a multimodal Internet self-response and CAPI survey in a future interview cycle.

b. Data Dissemination

The Census Bureau currently makes public-use micro data collected by the AHS available to the public on the Census Bureau Internet Web site at:  
<http://www.census.gov/programs-surveys/ahs>

The Census Bureau will make the 2025 AHS summary data available via the AHS Table Creator Tool (<http://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html>).

The data being disseminated and released are not individually identifiable and will have been cleared for release/dissemination by the Census Bureau's Disclosure Review Board.

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.**



a. Duplication in the Core Modules

HUD consulted with other government agencies and determined that the AHS is the only data source with both detailed information on the physical condition of the housing inventory and of rents of housing units. Although housing data are collected as part of the American Community Survey (ACS) (Census Bureau), Consumer Expenditure Survey (CES) (Bureau of Labor Statistics), and the Residential Energy Consumption Survey (RECS) (Department of Energy), none of these surveys provide the type of longitudinal data over a period of years or the detailed information available from the AHS. The CES collects housing cost data but does not collect detailed information on vacant units. The RECS does not collect mortgage or detailed housing cost data. Neither the ACS nor the RECS have detailed information on the physical condition of housing units or information on vacant units. Thus, these datasets could not serve as substitutes for the measures produced by the AHS that detail worst case housing needs.

The purposes of the AHS and the other surveys cited above also differ according to the agency's goals and objectives. Certainly, the HUD surveys involve personal/household behavior with respect to housing and community development issues. However, human behavior in general is conditional on fundamental familial, demographic, housing, and economic variables. Generally, HUD is not interested in the levels of individual variables, but in the relationships among variables. Therefore, they must observe the values of the variables for the same individuals in the same sample to capture covariance structure. (All multivariate statistical procedures rely on the covariance structure.) The AHS asks about the same fundamental variables but goes further and asks numerous detailed questions about other aspects of housing consumption, finance, and moving. In order to understand human behavior and detailed housing information, HUD needs to know how the fundamental housing variables affect or are related to the more detailed housing variables. It would make no sense to collect detailed information about housing cost burdens and mortgage financing if HUD had no idea about fundamental housing attributes such as size, value, or rent of the housing unit.

b. Duplication in the Supplemental Modules

HUD undertook considerable effort to determine if the supplemental modules would be duplicative of existing surveys. HUD's conclusions are below:

1. Climate Risk and Insurance: Some of the electric vehicle questions in this module were adapted from the Residential Energy Consumption Survey (RECS), but most of the remaining content was developed specifically for the 2025 AHS and has not been asked in other federal government surveys.
2. Accessory Dwelling Units: No other federal surveys ask questions on Accessory Dwelling Units.

3. Housing Accessibility: Much of the content is based on the 2011 AHS Home Accessibility module, which was revised for the 2019 AHS. The American Community Survey (ACS) conducted by the Census Bureau collects information on disability along with other demographic characteristics. In 2014, ACS published a report on “Older Americans with a Disability: 2008-2012”. This data focused on the correlation between various demographic characteristics and current living arrangement. In 2012, the Current Population Survey (CPS) included a supplement on disability for the BLS to measure data specific areas related to the employment of persons with disabilities. The AHS would allow analysis of current housing stock and mobility needs of persons with disabilities.
4. Arts and Culture: The Arts and Culture module was previously asked in 2015, but a review of Federal Surveys did not find comparable questions.
5. Housing Costs Roster: The housing cost roster questions are asked in the Survey of Income and Program Participation (SIPP) development by the U.S. Census Bureau. The universe for the SIPP costs questions is slightly different than the AHS and reference the December household roster while the AHS questions ask for the previous year.

6. Sexual Orientation and Gender Identity (SOGI) Questions: Self-reported SOGI questions are collected in several federal surveys, including the National Crime Victimization Survey (NCVS) and the Census Household Pulse Survey, but have not been collected in surveys with extensive data on housing characteristics, costs, and quality.

The following report list current SOGI measures in federal surveys:

<https://nces.ed.gov/FCSM/pdf/buda5.pdf>. Proxy SOGI questions have been asked in married or cohabitating spouses and partners in the General Social Survey. Self-report and proxy SOGI questions are currently being tested in the 2024 American Community Survey (ACS) Content Test.

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

We have designed the AHS questions to obtain the required information, while keeping respondent burden to a minimum. The data are collected only from individual households, not small businesses or other small entities. For unoccupied units, data are collected from a “knowledgeable respondent,” who could be a landlord, property manager, rental agent, real estate agent, or neighbor.

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.**

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As a longitudinal survey, we interview our samples periodically to provide intermittent readings between decennial censuses. The length of time between interviews is two years on the AHS. Less frequent enumerations would reduce HUD's ability to detect changes in worst case housing needs. Without this ability, the Administration and Congress would be unable to formulate policy on housing assistance.

**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; **Not Applicable.**
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **Not Applicable.**
- Requiring respondents to submit more than an original and two copies of any document; **Not Applicable.**
- Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Not Applicable.**
- 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; **Not Applicable.**
- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **Not Applicable.**
- 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; **Not Applicable.**
- 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. **Not Applicable.**

We collect the data in a manner consistent with OMB guidelines, and there are no special circumstances.

**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. 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.**

- 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.**

a. Federal Register Comments

In accordance with 5 CFR 1320.8(d), the agency's notice announcing this revision to the currently approved data collection request for the American Housing Survey (AHS) under OMB Number 2528-0017 appeared in the Federal Register on September 3, 2024, (Volume 89, No. 170, Page 71384-71385). A copy of the Notice is included as Attachment 6. The public had until November 4, 2024, to submit comments. Two comments were received.

HUD received two public comments.

The first, from the Pine Street Inn, a nonprofit organization that provides resources and support to the homeless population in the greater Boston area. The organization expressed strong support for the proposed changes to the American Housing Survey data collection process and commented that "data regarding the country's current housing crisis, including the physical condition of homes and neighborhoods, the cost of financing and maintaining homes, and the characteristics of households, is of great importance to our organization." HUD appreciates the Pine Street Inn's comments and support of the proposed changes for the 2025 AHS.

The second, from Manufactured Housing Institute (MHI), expressed support for the change to continuous data collection, stating "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." MHI also asked for clarification on the intervals for release of data and if the releases would be annual or even monthly. HUD appreciates the Manufactured Housing Institute's comments and support of the proposed changes for the 2025 AHS. Currently, HUD plans to release annual and biennial PUF data products. The biennial file will produce two-year estimates, similar to an average of two consecutive annual estimates.

b. Consultations Influencing the 2025 AHS Core Modules

The content of the 2025 AHS Core Modules are the result of many years of consultation and testing starting with the development of the 1984 AHS questionnaire. For the original 1984 AHS questionnaire approximately 250 prospective data users were consulted who represented diverse areas of interest. The BEA suggested modifications to the original questionnaire to improve BEA's estimates and to improve the clarity and consistency of the questions.

HUD and the Census Bureau routinely consult with outside groups who are frequent users of the AHS, including the National Association of Home Builders and the Harvard Joint Center for Housing Studies (JCHS). Because of the depth of their experience with the AHS, these groups often make recommendations concerning minor changes to AHS questions. The Neighborhood Quality Module was added to the core and the number of questions in the module was reduced after consultation with NAHB. In consultation with JCHS, questions on the date of completion and the source of financing for remodeling jobs were added to the Home Improvement and Remodeling Module. We also worked with JCHS to combine some of the Home Improvement job categories to reduce respondent burden. The EIA at the Department of Energy was consulted in the development of utility cost allocation models, which are used to model utility costs using household and housing characteristics and climate data in the 2025 AHS. The change to the disaster-related moves question was made in consultation with a professor of population studies, environment and society from Brown University. HUD consulted with the Census Bureau on its plan for implementing OMB's 2024 SPD 15 Race and Ethnicity Revisions (<https://spd15revision.gov/>) in the AHS. Implementation of SPD 15 revisions in the AHS will follow testing of the questions in the American Community Survey, which is ongoing and will not be finalized before the 2025 AHS data collection but will likely be finalized by the 2027 AHS data collection.

c. Consultations Influencing the 2025 AHS Supplemental Modules

The process of developing the 2025 AHS supplemental topic modules included consultations with several outside groups.

1. Climate Risk and Insurance: For this module, HUD reviewed questions submitted by the AHS Analytic Support contractor, the SP Group, which developed a report on the subject for HUD. Consultation with the Joint Center for Housing Studies (JCHS) at Harvard University, yielded several topic suggestions which HUD considered during development of the module.
2. Accessory Dwelling Units: Questions on Accessory Dwelling Units (ADUs) are not asked on any Federal Survey. To develop this module, we had discussions with policy experts in the HUD's Office of the Secretary and consulted work by the Joint Center for Housing Studies at Harvard.

3. Home Accessibility: For the 2025 supplemental module, the questions were adopted from the 2019 Home Accessibility Module. The 2019 supplemental module was created with consultations between HUD and representatives from the Joint Center for Housing Studies at Harvard, the National Association of Home Builders, AARP, and advocates for the disabled.
4. Arts and Culture: For this module, HUD primarily used questions that were included in the 2015 Arts and Culture module.
5. Housing Costs Roster: For the questions that identify which household members pay the rent/mortgage and utilities, HUD consulted with representatives from the U.S. Census Bureau that work on the Survey of Income and Program Participation (SIPP), a longitudinal survey of that collects similar information but with a different primary focus than the AHS.

6. Sexual Orientation and Gender Identity Questions: Question wording was influenced by wording from the National Health Interview Survey (NHIS), the National Crime Victimization Survey (NCVS), the Census Household Pulse Survey, and the American Community Survey (ACS) and staff from the Centers for Disease Control and Prevention (CDC), the Bureau of Justice Statistics (BJS), and the Census Bureau were consulted on the wording of the questions. Questions and methodology were discussed with members of the Federal Committee on Statistical Methodology's (FCSM) interagency research group on measuring sexual orientation and gender identity. Question wording variation for gender identity questions were informed by wording in the 2024 ACS Content Test.

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

Respondents will not be paid for their participation in the 2025 American Housing Survey.

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

The Census Bureau collects these data in compliance with the Privacy Act of 1974 and OMB Circular A-108. The Census Bureau will send each sample address an Advance Letter (AHS-26/66(L)) in advance of the interview containing the information required by this act.

The Advance Letter, included as part of Attachment 7, informs the respondents of the voluntary nature of this survey and states that there are no penalties for failure to answer any question. The letter explains why the information is being collected, how it will be used, and

that it will take approximately 45 minutes to complete the interview. The letter displays the OMB control number and date of expiration.

As part of the introduction for personal-visit households, the Census Bureau FRs will ask the respondents if they received the Advance Letter. If not, the FRs will give the letter to the respondents and allow them sufficient time to read the contents. We also display the program website and the toll-free phone number of the regional office for which the FR works as a way for the respondent to authenticate her/his/their employment with the Census Bureau. For interviews conducted by telephone, FRs will read a condensed version of the advance letter to the respondents that includes the information required by the Privacy Act.

After the interview is completed, the FRs will give the respondents a "Thank You" Letter (AHS-28/68(L)), also included as part of Attachment 7. Both the Advance Letter and the Thank You Letter state that all information respondents give to the Census Bureau employees is held in strict confidence by Title 13, United States Code. Each FR has taken an oath to this effect and is subject to a jail term, fine, or both, if he/she/they discloses any information given to him/her/they.

The data collected under this agreement are confidential under Title 13, U.S.C., Section 9(a). Should HUD staff require access to Title 13 data from this survey to assist in the planning, data collection, data analysis, or production of final products, those staff members are required to obtain Census Bureau Special Sworn Status (SSS). They must demonstrate that they have suitable background clearance and they must take Title 13 Awareness Training.

Any access to Title 13 data at HUD is subject to prior approval by the Census Bureau's Data Stewardship Executive Policy Committee upon assurance that the HUD facility and information technology security meet Census Bureau requirements.

**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.**

Although sexual orientation and gender identity (SOGI) questions are thought of as sensitive questions, research has found they have similar sensitivity to existing questions like income or disability, but that sensitivity does not result in respondents refusing to answer the questions (<https://www.census.gov/library/working-papers/2018/adrm/rsm2018-06.html>). Self-report SOGI questions will be limited to respondent age 18 or older and proxy SOGI questions will be limited to household members aged 18 or older. The AHS is a voluntary survey, and respondents have the option of refusing to answer any question.

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**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;**
- \* If this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in chart below; and**
- \* 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 in Item 13.**

We estimate the respondent burden hours to be about 46,416.91 hours. Refer to the following table for more detailed information.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Occupied Interviews	59,500	1	59,500	.75	44,625	\$23.11	\$1,031,283.75
Vacant Interviews	8,750	1	8,750	.08	700	\$23.11	\$16,177.00
Non-interviews	16,625	1	16,625	0	0	\$23.11	\$0
Ineligible	2,625	1	2,625	0	0	\$23.11	\$0
<b>Subtotal</b>	<b>87,500</b>	<b>1</b>	<b>87,500</b>	<b>0</b>	<b>45,325</b>	<b>\$23.11</b>	<b>\$1,047,460.75</b>
Reinterviews	6,423	1	6,423	.17	1,091.91	\$23.11	\$25,234.04
<b>Total</b>	<b>93,923</b>	<b>1</b>	<b>93,923</b>	<b>1</b>	<b>46,416.91</b>	<b>\$23.11</b>	<b>\$1,072,694.79</b>

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).**



- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The annualized cost estimate to respondents for burden hours is \$1,072,694.79. This estimate is based on the most recent estimates on the median hourly wage (\$23.11) for all occupations from the Bureau of Labor Statistics (BLS): [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm).

**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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

HUD estimates the 2-year survey cycle costs to the government for the 2025 AHS to be \$74,134,000.

Cost Items	FY 2024	FY2025	Total
Professional Staff	\$7,700,000	\$7,800,000	\$15,500,000
Field Data Collection	\$20,034,000	\$27,700,000	\$47,734,000
Technology	\$5,400,000	\$5,500,000	\$10,900,000
<b>Total</b>	<b>\$33,134,000</b>	<b>\$41,000,000</b>	<b>\$74,134,000</b>

The figures above are based on the following factors.

- For professional staff, the estimates are based on actual money spent in FY 2024 and budgeted “not-to-exceed” amounts for FY 2025. Professional staff include survey methodologists, statisticians, computer programmers and other IT support, communications specialists and managers.
- For field data collection, projected costs reflect “not-to-exceed” amounts. The projected costs are provided by the Census Bureau’s field case management cost projection model. The cost projection model uses information on costs from prior surveys (including, but not limited to, the AHS), specifications for the current AHS, and current local and regional labor rates.
- Technology costs include purchase and maintenance of laptops. This estimate is provided by the Census Bureau and reflects a cost-sharing portion of the Census Bureau’s annual technology costs CAPI-based surveys. All surveys using CAPI share in the cost of technology.

**15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.**

The estimated respondent burden for 2025 (46,417 hours) is significantly lower than respondent burden cited in the 2023 AHS Supporting Statement. The reason for this is that the AHS increased the overall sample size but shifted to a continuous data collection cycle where respondents from the sample will be interviewed over the course of two years. This method reduces the overall burden on respondents in a single calendar year.

The 2025 AHS sample will be split into two groups. Fifty percent of the sample will be asked the Accessory Dwelling Unit module, and the other 50 percent will be asked the Arts and Culture module. This will maximize the number of supplemental modules that can be included while minimizing increases in overall response burden.

**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 Census Bureau has scheduled the 2025 field enumeration for the AHS survey to between May 1st, 2025, and December 31st, 2026. The entire reinterview data collection will span between May 2<sup>nd</sup>, 2025, and December 31st, 2026.

The projected release date of the National public use files (PUFs) is September 2026<sup>th</sup>. When processing the data, the Census Bureau usually implements basic data edits to ensure consistency. In some cases, statistical models are used to allocate for missing values, such as values for income, utility cost, etc. Allocated values can be identified by analysts with the help of variables that are included in the data set that tag such edits. We also create new variables by collapsing or combining questions in the survey.

Data products will include annual and biennial PUF data files. The biennial file will produce two-year estimates, similar to an average of two annual estimates. HUD and the Census Bureau will issue additional product announcements when releasing the PUFs, as well as the Table Creator tables as agreed upon with HUD. The Department of Commerce or HUD may release other publications.

The data being disseminated and released are not individually identifiable and will have been cleared for release/dissemination by the Census Bureau's Disclosure Review Board.

**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.**

The OMB number and expiration date will be included on the AHS-26/66(L) Advance Letter. Because the questionnaire is an automated instrument, the respondent will not see the OMB number and expiration date.

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

There are no exceptions.