



COALITION ON HUMAN NEEDS

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CHN Comments on Survey of Construction: Questionnaire for Building Permit Official,
Docket Number USBC-2025-0010.

The Coalition on Human Needs (CHN) is submitting the comments below in response to the request for comments on Department of Commerce's proposed extension of the *Survey of Construction: Questionnaire for Building Permit Official* published in the Federal Register on July 27, 2025.

The Coalition on Human Needs (CHN) is an alliance of national organizations working together to promote public policies which address the needs of low-income and other vulnerable populations. The Coalition's members include civil rights, religious, labor, and professional organizations, service providers and those concerned with the wellbeing of children, women, the elderly, and people with disabilities. The Coalition on Human Needs monitors and tracks data on human needs in the United States, including data on poverty, on policies that reduce poverty, and on hardship. The Coalition uses Census data including the Current Population Survey (CPS) and the American Community Survey (ACS) in its work. The Coalition is one of four organizations that formed and continues to co-lead Count All Kids, a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

The Coalition on Human Needs commends the Bureau for considering using satellite images to supplement the survey of construction, and asks the Bureau to clarify whether it is using the same satellite images for the Master Address File (MAF). The Survey of Construction (SOC) is a critical component of the annual population estimates that the Census Bureau produces for each city and town. These estimates use the "housing unit method" which starts with the most recent census count of housing units for each area and updates that number using building permit data, estimates of housing demolitions, and results from the SOC to reflect changes in the housing stock. The updated count of housing units is then multiplied by an estimate of the average number of people per household and adjusted for vacancy rates. By tracking changes in the number and type of housing units, along with occupancy patterns, this method provides a practical and cost-

effective way to estimate population change at the city, town, and other sub-county levels in the years between full population counts. The SOC is a critical component of the Census Bureau's annual population estimates for cities and towns, and these estimates are a critical resource for government agencies, businesses, and community organizations who use them for allocating federal and state funding, guiding infrastructure investments, planning public services such as schools, hospitals, and transportation, and informing emergency preparedness and disaster recovery strategies.

CHN encourages the Bureau to use satellite imagery to supplement the data from the Survey of Construction, and urges the Bureau to explain why it is using satellite data for the Master Address File but cannot use the same images for the Survey of Construction.

On August 19, Census Director Jarmin published a blog "Source Data Innovation at the Census Bureau: Improving the Quality and Sustainability of our Statistics".

<https://www.census.gov/newsroom/blogs/director/2025/08/source-data-innovation.html>

. In that blog he described experimental work to produce estimates of Single-Family Housing Starts and Completions using satellite imagery to supplement data from the Survey of Construction. This seems like an appropriate step in reducing cost associated with developing such estimates. It also is a way to make the data more accurate, because satellite images could pick up residential housing that may not have been developed with housing permits—for example, installation of mobile homes on property that already has a house, as accessory housing, or identifying fixtures such as air conditioners or coolers on buildings such as garages that indicate they are serving as residences even though the Bureau's records might not indicate that they are residences. In other words, satellite images might help identify hidden or accessory housing where building permits are not in play.

In the blog Director Jarmin writes: "Given the expense of detailed imagery, a careful comparison of the cost-quality tradeoff vs. traditional personal-visit methods is required before expanding nationwide." In the same blog he explains that "our geographic support program has built on that success by using machine learning for automated change detection in satellite imagery, along with parcel-level administrative data, to keep the MAF up to date throughout the decade. Given the increased accuracy of the MAF from using these new source data and tools, we anticipate only needing to deploy listers in a small number of unusual cases (e.g., in extremely remote areas) before the 2030 Census."

The cost-quality tradeoff for the SOC is not stated as a concern or consideration in the use of satellite imagery in the development of the Master Address File. CHN asks the Bureau to clarify whether the Survey of Construction does not have access to the same high quality

satellite imagery that is utilized in the development of the Master Address File, or whether the Master Address File based on satellite imagery has not been fully scrutinized for quality.

While CHN supports the use of satellite imagery for both the SOC and the MAF, it believes the Bureau has to also send staff out to search for hidden or accessory housing on the ground since even the best satellite images cannot help identify such housing if that housing has no external features that can be identified by satellite. For example, staff on the ground can see extra mailboxes, or can see whether a garage door has had weatherstripping applied. As CHN has commented in the past, young children are disproportionately likely to live in very low-income households, and such households are more likely to live in accessory and hidden and other kinds of informal housing. Bureau staff has made public commitments to conduct this kind of on the ground search for informal housing; CHN asks the Bureau to confirm that it still plans to do so or to explain why it no longer considers this necessary.

In summary, the Survey of Construction: Questionnaire for Building Permit Official provides critical data for the annual population estimates for cities and towns which in turn guide innumerable public and private investment and planning decisions. The possibility of modernizing the development of estimates from the Survey of Construction by supplementing survey results with satellite imagery is an important step forward for the Census Bureau. The cost-quality tradeoff of replacing personal visits with satellite imagery should be carefully scrutinized for both the development of Single-Family Housing Starts and the development of the Master Address File.

Thank you for the opportunity to submit these comments. Please direct any questions to me at dweinstein@chn.org.



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