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Colette Pollard  
Reports Management Officer, QDAM  
Department of Housing and Urban Development  
451 7th Street, SW.  
Room 4176  
Washington, DC 20410–5000

Re: Notice of Proposed Information Collection: 2015 Rental Housing Finance Survey (OMB Control Number 2528–0276)

Dear Ms. Pollard:

On behalf of the National Association of Home Builders (NAHB), I would like to comment on the above-referenced notice published in the *Federal Register* on August 22, 2014 (79 Fed. Reg. 49793) concerning the 2015 Rental Housing Finance Survey (RHFS). NAHB is a Washington-based trade association representing more than 140,000 members involved in all aspects of housing, including the building, financing, operation, and management of multifamily rental housing. As an organization, NAHB also has explicit policy on maintaining and improving the scope and quality of housing data. NAHB and its members thus have a strong interest in the RHFS.

The information produced by the RHFS is of great practical utility, filling a gap that would otherwise exist in the federal data system. Many surveys provide information about housing units, but only the RHFS produces information about properties. Therefore, the RHFS is the only source of basic information on properties with more than one housing unit, including how many of them there are.

The RHFS is also necessary to support the functions of HUD and other agencies involved in regulating rental housing properties. Prior to the launch of the RHFS in 2012, analysis of regulatory impacts had to be based on the 2001 Residential Finance Survey or 1996 Property Owners and Managers Survey, neither of which has been repeatable due to lack of funding. The utility of these older data sources is diminishing over time as housing markets in the U.S. continue to evolve.

In addition, the RHFS supports the mission of the U.S. Bureau of Economic Analysis to provide timely and accurate information on the economic accounts of the United States. The RHFS is the only post-2001 federal data source that contains estimates of value and rent for the same property, something required to estimate imputed rent on owner-occupied housing—which, according to current estimates, accounts for more than 8 percent of Gross Domestic Product.

The ability of data from private sources to help fill this gap is limited. Although some private organizations collect information on a subset of rental properties, smaller properties not run by professional management companies are usually out of scope for these organizations. These smaller properties are numerous, and studies of individual markets have shown that they often behave quite differently from larger properties in the same area. Where information on the total stock of rental properties in the U.S. is required, there is no substitute for the RHFS.

NAHB is still evaluating how to best utilize the RHFS, but we have already found data from the 2012 RHFS very helpful on a number of occasions, for example, as a source of basic industry data. We have published estimates of the number of properties and buildings from the 2012 RHFS. We have also estimated the total market value of rental properties in the U.S., as well as the distribution of rental properties by market value. In the area of policy analysis, we are using the 2012 RHFS to answer questions about how well the older housing stock is serving the U.S. population and whether or not problems of deferred maintenance and capital spending exist for certain categories of properties.

We anticipate that the utility of the RHFS will grow as NAHB and other organizations learn how to use it, and as HUD and the Census Bureau learn more about collecting and processing the data. There were some complications involved with the first release of data from the inaugural 2012 RHFS, but these were generally traceable to the difficulty of developing a sample design after an extended period when no property-level data had been collected.

HUD and Census Bureau have done a good job of maintaining a transparent process and involving private stakeholders in the development of the RHFS. NAHB is confident that the practical utility of the RHFS will naturally increase as the survey evolves and various lessons are learned along the way. Failure to fund the RHFS at this point would be particularly disadvantageous, leading to increased costs down the road, when the gap in property-level data would again be recognized and collection efforts would need to be re-started without having learned all the intricacies involved in the complex sample design.

For these reasons, NAHB strongly supports HUD's proposal to collect information in the 2015 RHFS as described in the August 22 *Federal Register* notice. HUD's estimate of the reporting burden associated with the RHFS seems reasonable and easily justified by the value of the information produced. NAHB greatly appreciates the opportunity to comment on this important federal data collection effort.

If you have any questions about NAHB's comments, please contact Paul Emrath, NAHB's Vice President of Survey and Housing Policy Research (202-266-8449, [pemrath@nahb.org](mailto:pemrath@nahb.org)).

Best regards,



David Crowe  
Chief Economist