



October 3, 2012

Reports Liaison Officer
Office of Policy Development and Research
Department of Housing and Urban Development
451 7th Street SW, Room 8226
Washington, DC 20410

Re: Docket No. FR-5609-N-08, Notice of Proposed Information Collection for Public Comment:
2013 American Housing Survey

Dear Sir or Madam:

We appreciate the opportunity to comment on the Department of Housing and Urban Development's (HUD) Proposed Information Collection for the 2013 American Housing Survey. We believe the collection of housing data in the U.S. Census, and the more frequently collected American Housing Survey and American Community Survey, provides essential information for policymakers, public agencies, and others concerned about the state of housing in America today. These surveys should continue to be funded and supported by Congress and the relevant agencies.

Reconnecting America is a national nonprofit organization that focuses on the interaction between transportation investments and housing developments, placing particular emphasis on the benefits of locating housing near transit. Our work, as well as the work of others who are concerned about accurately tracking housing needs in a community, is highly dependent on the collection and dissemination of high quality national housing data. The data included in the American Housing Survey enables us to inventory housing types, characteristics, and needs in a community and also allows us to understand the changing landscape of households across the country. Contrary to data such as county assessor's data which monitors changes in properties for tax purposes and is done differently in every county, the American Housing Survey and other national data sets collected by the Census Bureau are uniform, national in scope, and comparable across all geographies, which allows us to compare cities and metropolitan regions to each other. This is an invaluable tool in our ongoing work with communities to better integrate housing, transportation, and jobs.

With that being said, we also wanted to provide specific responses to some of the issues brought up in the Notice of Proposed Information Collection.

1. *The collection of data should be consistent in terms of sample size and geography from year to year.* Budget and cost cutting year to year that change the survey sample size or

www.reconnectingamerica.org

1707 L Street, N.W.
Suite 210
Washington, D.C. 20036

T 202.429.6990
F 202.315.3508

436 14th Street
Suite 1005
Oakland, CA 94612

T 510.268.8602
F 510.268.8673

899 Logan Street
Suite 300
Denver, CO 80203

T 303.861.1420
F 303.573.1574

geography make it harder to compare data across time. Larger sample sizes are important because they allow for better extrapolation and more accurate portrayal of information in smaller geographic areas. This has become evident in the difference in data quality between the former SF3 datasets and the current collection of American Community Survey data. The smaller sample sizes in different years have made the data much harder to work with at smaller geographies where trends are most noticeable.

Part of the reason for collection of the data is to be able to compare to the past and the future. This benefits our work in that we can see housing trends that might not otherwise be evident. An example comes from our recent work on housing near transit. Using data from the Census, we found that more housing units are being constructed near transit stations, yet they are smaller and have fewer people per household than before. Without accurate comparable data, we would not be able to tell if this change is real, or just the result of low sample sizes and bad data in small geographies. The ability to compare across years is extremely helpful with these issues and should be considered when discussing the possible need to rework the surveys. The decennial census is a great example of this working well. In order to have practical utility to the agency and other users, the survey should be consistent across years.

2. *The burden of response should be minimized in a way that does not discourage lower-income residents from responding.* It is important that the data collected through the survey is as broad-based as possible. While permitting electronic submissions would be helpful in getting larger sample sizes, which are desirable, there is also a worry that lower income communities could be left out of the data collection, as the prevalence of internet connections is lower in such areas. In addition, residents must be knowledgeable about housing terms to accurately respond to the survey, so the materials that come with the Housing Survey must contain sufficient educational information in order to ensure that residents of all backgrounds can respond. It would also benefit people to have a place to look up definitions and explanations for each of the questions on the web or in an accompanying description form.
3. *We encourage the collection of additional data.* Additional data allows people working on these issues greater accuracy at predicting trends and spotting relationships. As an organization that focuses on transportation and land use issues, we would certainly welcome greater collection of mobility data relating to household travel for errands and work. Additionally, because the cost of housing and transportation are inextricably linked as the two largest family budget items, more information on how much people are spending on transportation within households and the tradeoffs could be beneficial.

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There are a range of emerging issues that intersect with housing, such as economic development and public health, that would be worth adding if the appropriate survey questions and data measurements can be determined.

4. *Coordinate but also distinguish the American Housing Survey from other data collection by federal agencies, including the U.S. Census.* The American Housing Survey is clearly distinct from the U.S. Census, but there is sometimes confusion about what each federal data set provides and how they relate to one another. In order to be most efficient with federal resources and demonstrate the continuing value of the AHS, HUD should clearly explain the difference between the AHS and the Census/ACS and when to use each dataset.

Again, thank you for the opportunity to comment on the collection of data. We hope that the Department of Housing and Urban Development as well as the Bureau of the Census continues to collect high quality data and information related to housing in the United States. We use data from the Census almost daily and would be at a loss if we did not have access to this crucial information.

Sincerely,

A handwritten signature in black ink, appearing to read "John Robert Smith". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

John Robert Smith
President and CEO