

Federal Data Collection Comment Opportunity for AEA Members

2018 Rental Housing Finance Survey Department of Housing and Urban Development

Comments Due January 22, 2018

The U.S. Department of Housing and Urban Development (HUD) asks OMB to approve the 2018 Rental Housing Finance Survey (RHFS). The RHFS measures financial, mortgage, and property characteristics of rental housing properties in the U.S. It focuses on mortgage financing of rental housing properties, with emphasis on new originations for purchase-money mortgages and refinancing, and the characteristics of these new originations. The RHFS is conducted every three years—it was carried out in 2015 and 2012.

The estimated RHFS survey sample is 11,457 properties, 23% greater than in 2015. The proposed 2018 questionnaire is the same as in 2015. The RHFS data collection will be conducted from May-October 2018. Data tables and a public use file will be published in 2019.

AEA members are encouraged to:

- describe the value of the 2018 RHFS for economic research;
- comment on the data collection instruments and methods; and
- suggest changes that would enhance data quality, value, and accessibility and lower respondent burden and federal cost.

Federal Register notice: December 22, 2017 (includes instructions for submitting comments)

- <u>Information Collection Request</u> (ICR) submitted by HUD to OMB, including:
 - o <u>RHFS survey instruments</u>
 - o **Supporting Statement**
- Due date for comments: January 22, 2018
- More information: William Reeder, Director, Housing Finance Analysis Division, HUD William.J.Reeder@hud.gov

Information on ICR Process:

 By law, each data collection carried out by a federal agency must be cleared by OMB. Through the *Federal Register* notice, HUD is announcing that it has submitted a request to OMB for clearance to conduct the 2018 RHFS and offers the public a 30day opportunity to submit comments to OMB. • After the close of the 30-day comment period, OMB will make its decision.

Guidance to AEA Members on Preparing Comments:

- Can comment on any aspect of the proposed data collection. Possible topics, for instance, include needs, uses, methodology, design, cost, schedule, and consultation with data users.
- May frame comments on specific topics in any way, such as:
 - o assessments identifying what you do and do not like and support
 - o suggestions for how HUD might proceed in this or future collections
 - o requests for example, for a change in the design of the survey instrument, to be consulted in the future, to carry out research on an alternative approach
 - observations for example, implications of the sample size for statistical reliability
- May propose that OMB incorporate a request in its "terms of clearance." For
 instance, you could suggest as a term of clearance that HUD research the efficacy of
 an alternative set of questions and report back to OMB in a year on the results.

Additional AEA Resources:

- A Primer on How to Respond to Calls for Comment on Federal Data Collections
- After reviewing materials, you may provide your observations, critiques, and requests to AEAStat staff Andrew Reamer at <u>areamer@gwu.edu</u> and he will organize them into a draft letter for your review. Prof. Reamer is experienced in crafting comment letters for impact.