The U.S. Department of Housing and Urban Development's Sexual Orientation and Gender Identity (SOGI) Data Action Plan

George R. Carter III, Ph.D.
Director, Housing and Demographic Analysis Division
Gretchen P. Armstrong, M.P.A.
Social Science Analyst, Program Monitoring and Research Division
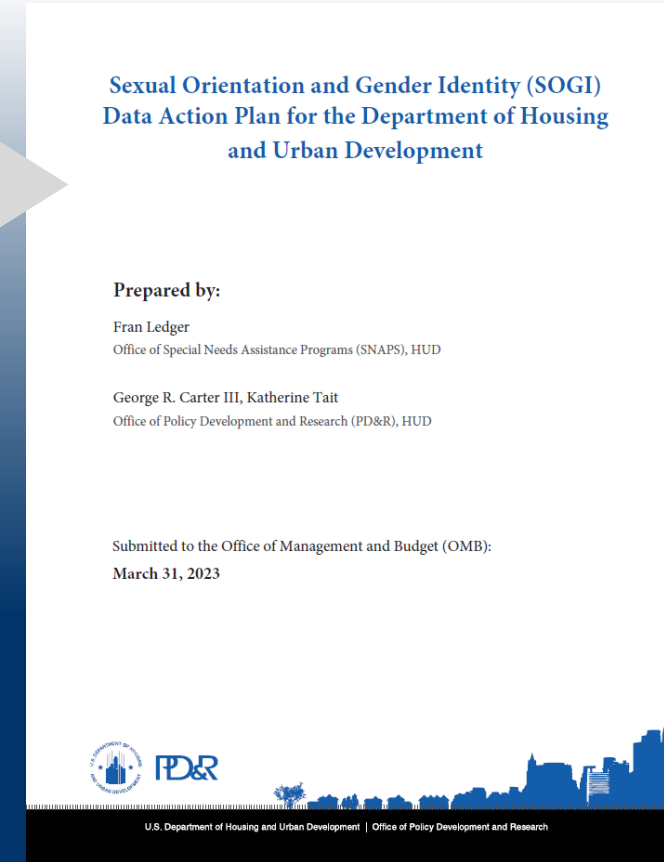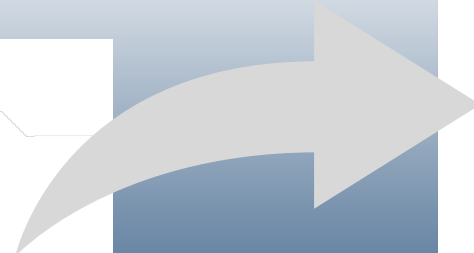HUD Office of Policy Development & Research

Disclaimer

This presentation is intended to inform interested parties of ongoing research and to encourage discussion of work in progress. The views expressed in this presentation are those of the authors and do not represent the official positions or policies of the U.S. Department of Housing and Urban Development or the U.S. government.

HUD's Sexual Orientation and Gender Identity (SOGI) Data Action Plan

How did we develop HUD's plan?

- **Served on OMB Working Group**

- **Consulted with offices across HUD:**

  - **Policy Development & Research (PD&R)**

  - **Community Planning And Development (CPD), Office of Special Needs Assistance Programs (SNAPS)**

  - **Fair Housing/Equal Opportunity (FHEO)**

  - **Public and Indian Housing (PIH)**

  - **Office of General Counsel (OGC)**

- **To establish:**

  - **Process to document activities across HUD**

  - **Policies driving those activities**

  - **Infrastructure in place to support them**

  - **Milestones to track progress on SOGI data collection and analysis**

Policies Related to SOGI Data

- HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all.

- HUD's FY 2022 – 2026 Strategic Plan

- Fair Housing Act

  - Bostock v. Clayton County

- Equal Access Rule

  - 2012 Equal Access Rule

  - 2016 Equal Access Final Rule

- FY2022 Homeless Management Information System (HMIS) Data Standards

- HUD's Office of Policy Development and Research Learning Agenda

- Executive Order 14075

SOGI Housing Research and Development of Learning Questions

- **Same-Sex Married and Cohabiting Couples**

- **Aging and Housing Needs over the Lifecourse**

- **Housing Discrimination**

- **Housing Insecurity**

  - **Forced Moves**

  - **Homelessness, including Youth Experiencing Homelessness**

- **Housing and Health**

- **Neighborhood Quality**

- **Subsidized Housing, including Supportive Services**

Overview of the HUD SOGI Data Action Plan

HUD Planning and Coordination

Data Collection Updates
- Survey data
- Administrative data

Working Groups for sharing best practices
- Within HUD
- Between government agencies

HUD Learning Questions
- 10 research questions
- Specific action items related to each

Progress on Deliverables

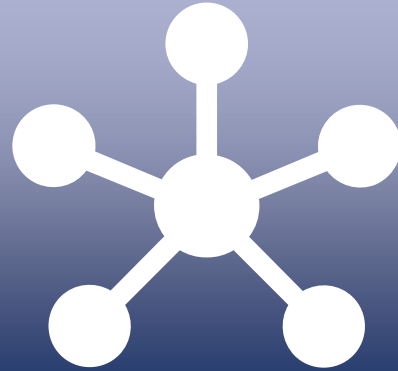|	First 12 months				Year 2	
	3-6 Mo	6-8 Mo	8-10 Mo	10-12 Mo	12-18 Mo	18-24 Mo
Planning and Coordination						
HUD will compile milestones across initiatives	✓					
Review data access and confidentiality			✓			
HUD will assess the number of data collection instruments at HUD				✓		
Determine where SOGI data could be aligned across offices				✓		
Increase SOGI Data Collection						
50058: Update instructions and coding to expand GI reporting	✓					
50059: Update instructions and coding to expand GI reporting				in progress	FY 2025	
Update HMIS SOGI data elements for 2026				✓		
Add SOGI questions to 2023 AHS data collection					✓	
Establish Working Groups						
HUD Gender Identity Data Standards Working Group	✓	✓	✓	✓	✓	✓
Interagency Community of Practice on SOGI Data Action Plan Implementation	✓	✓	✓	✓	✓	✓
Working Group on LGBTQIA+ Homelessness and Housing Equity					✓	✓
Other Efforts Supporting Learning Questions						
Develop tools, products, materials for program participants	~ both in progress& ongoing ~			✓		
Issue clarification to HUD Equity Action Plan					✓	
Update next learning agenda 2026-2030					FY 2025	

HUD Planning and Coordination

Cross-office effort to review current practices and produce a common approach to **SOGI data access and confidentiality protections**

– Complete

Internal assessment to determine where **SOGI data could be aligned across offices** to inform program decision-making once it is available

– Initial assessment complete

Update HUD's Learning Agenda based upon newly available SOGI data

– Next full Learning Agenda will cover 2026-2030

– Work will begin in FY2025

Update/clarify the HUD Equity Action Plan indicating that SOGI data should be collected where feasible in alignment with input from partners and recommendations in the Federal Evidence Agenda

– Complete

Data Collection: AHS, HMIS

Data Collection	Purpose	Update	Gender Identity Data?	Sexual Orientation Data?
American Housing Survey (AHS)	A partnership between HUD and Census, AHS is the most comprehensive national housing survey in the United States.	2023 data collected on adult household members in 2023; Self-reported data was published Sept 2024. Proxy data collected for research and testing.	Yes 2-step question	Yes 5 options
Homeless Management Information System (HMIS)	Collected by local Continuums of Care, HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness	2024	Yes 7 options, multi-choice	Yes 6 options

Data Collection: Administrative Data

Data Collection	Purpose	Update	Gender Identity?	Sexual Orientation?
HUD Form 50058	This application form applies to applies to Public Housing, Housing Choice Voucher, and Section 8 Moderate Rehabilitation program	2024	Yes 3 options (M/F/ unspecified or other GI)	Not at this time
HUD Form 50059	This application form applies to applies to HUD multifamily housing programs	TBD	No Anticipated Fall 2024	Not at this time
Federal Housing Administration, Home Mortgage Disclosure Act (HMDA)	HMDA requires financial institutions to maintain, report, and publicly disclose loan-level information about mortgages, using the Uniform Residential Loan Application	2018	Yes 3 options (M/F/do not wish to provide/blank)	Not at this time
Low-Income Housing Tax Credit Program (LIHTC)	State housing finance agencies annually report tenant data on income and rent for program compliance; **demographic information is not standardized and some HFAs do not report this information**	TBD	Not at this time	Not at this time

Working Groups

Continue/Establish HUD Working Groups

✓ HUD Working Group for EO 14075: Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals*

✓ **NEW:** Working Group on LGBTQIA+ Homelessness and Housing Equity

Participate in Interagency Working Groups

✓ Community of Practice on SOGI Data Action Plan Implementation*

✓ Federal Committee of Statistical Methodology (FCSM) working group on Sexual Orientation and Gender Identity Measurement in Federal Surveys

✓ OMB SOGI Interagency Working Group

✓ Meet with Census Bureau to explore where the addition of SOGI to Census-fielded surveys would improve HUD's ability to serve LGBTQI+ people in its programs

HUD SOGI Data Action Plan Learning Questions

1. How can HUD increase **housing stability, housing security, and housing safety** for lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI+) people?

2. How can HUD better **detect and reduce the incidence of housing-related discrimination** experienced by LGBTQI+ people?

3. How can HUD **engage and include LGBTQI+ people in the evidence-building process** to co-create evidence building activities, infrastructure, uses, and monitoring that is trauma informed and person centered?

4. In designing and implementing SOGI data efforts, how will HUD **address the heightened discrimination, exclusion, abuse, and/or violence** faced by LGBTQI+ people?

5. What are the **rates of LGBTQI+ individuals experiencing homelessness** based on age and race/ethnicity, and how do they vary by household type (i.e., households without children, households with only children, household with children and adults, etc.,)?

6. What are the age, LGBTQI+, and race/ethnicity **characteristics of homelessness** (including youth homelessness), and how do they vary by household type?

7. What are the **rates over time for LGBTQI+ individuals experiencing homelessness** in sheltered and unsheltered locations, and how do they vary by household type?

8. What aspects of HUD policies and programs supporting **aging-in-place for elders** need to be tailored to LGBTQI+ elders?

9. How do housing experiences and barriers to accessing and staying in decent, safe, and **affordable housing in opportunity neighborhoods** vary by sexual orientation and gender identity and vary based on intersecting identities like their race, ethnicity, age, disability status, and household type?

10. How do **experiences applying for HUD subsidies and living in HUD-assisted housing** for LGBTQI+ people differ based on intersecting identities like their race, ethnicity, age, disability status, and household type?

Stability Safety, and Anti-Discrimination

1. How can HUD increase housing stability, housing security, and housing safety for LGBTQI+ people?

2. How can HUD better detect and reduce the incidence of housing-related discrimination experienced by LGBTQI+ people?

4. In designing and implementing SOGI data efforts, how will HUD address the heightened discrimination, exclusion, abuse, and/or violence faced by LGBTQI+ people?

FHEO Tools

- LGBTQIA+ Fair Housing Toolkit
- HUD Fact Sheet on Preventing Harassment in Public Housing

CPD/SNAPS technical assistance materials

- Shelter Safety Guide
- Equal Access Training Scenarios
- Definitions of Family FAQs
- Client-Centered Data Collection Approach: Virtual Reality Series
- CoC analysis tool for SOGI data (in progress)

PD&R

- Testing innovative methods for measuring housing discrimination
- Housing Needs of Survivors of Human Trafficking study

3. How can HUD engage and include LGBTQI+ people in the evidence-building process to co-create evidence building activities, infrastructure, uses, and monitoring that is trauma informed and person centered?

CPD/SNAPS

- SNAPS office Gender Identity Standards Working Group of diverse partners, ***including people with lived experience and expertise***, advocates, researchers, community and federal partners, HUD Technical Assistance Subject Matter Experts, and HUD staff to support inclusive and responsible SOGI data collection and use practices

FHEO

- In December 2023 HUD principals began visits across the country to attend ***listening sessions with LGBTQIA+ youth and young adults*** with lived experience and will engage HUD grantees in identifying barriers to housing and shelter and effective methods of addressing those barriers.

5. What are the rates of LGBTQI+ individuals experiencing homelessness based on age and race/ethnicity, and how do they vary by household type (i.e., households without children, households with only children, household with children and adults, etc.,)?

6. What are the age, LGBTQI+, and race/ethnicity characteristics of homelessness (including youth homelessness), and how do they vary by household type?

7. What are the rates over time for LGBTQI+ individuals experiencing homelessness in sheltered and unsheltered locations, and how do they vary by household type?

CPD/SNAPS

- CPD/SNAPS
  - Reconvene LGBTQIA+ Standards Working Group
  - Review Homelessness Data SOGI elements

PD&R

- Oversee research grants to develop new and better methods of counting homeless youth, and publishing completed studies on Youth Homelessness
- E.g., Final evaluation of the Youth Homelessness Demonstration Program was published May 2023.

8. What aspects of HUD policies and programs supporting aging-in-place for elders need to be tailored to LGBTQI+ elders?

9. How do housing experiences and barriers to accessing and staying in decent, safe, and affordable housing in opportunity neighborhoods vary by sexual orientation and gender identity and vary based on intersecting identities like their race, ethnicity, age, disability status, and household type?

10. How do experiences applying for HUD subsidies and living in HUD-assisted housing for LGBTQI+ people differ based on intersecting identities like their race, ethnicity, age, disability status, and household type?

PD&R anticipates growth in these areas as the newly collected data become available.

- Current work in progress on aging in place, supportive services
- Increased understanding of intersectionality, specifically on where people are living, crossing SOGI data with other demographic variables
- A study of barriers and access may also require a more qualitative approach.

Summary of Learning Questions

1. How can HUD increase **housing stability, housing security, and housing safe**... intersex (LGB...

2. How can HUD... **housing-related**... people?...

3. How can HUD **engaging-in-evidence-building**... activities, infrastructure, and... informed and per...

4. In designing and implementing SOGI data efforts, how will HUD **address the heightened**... **and/or violence** fac...

5. What are the **rates of LGBTQI+ individuals experiencing homelessness** based on age and race/ethnicity, and how do they vary by household type (i.e., households without children, households with only children, household with children and adults, etc.,)?

6. What are the age, LGBTQI+, and race/ethnicity **characteristics of**... outh homelessness), and how do they...

... **le for LGBTQI+ individuals**... ss in sheltered and unsheltered locations, and how do they vary by household type?

... HUD policies and programs supporting **aging-in-**... need to be tailored to LGBTQI+ elders?

9. How do housing experiences and barriers to accessing and staying... decent, safe, and **affordable housing in opportunity neighborhoods** vary by sexual orientation and gender identity and... their race, ethnicity, age, disability status, and household type?

10. How do **experiences applying for HUD subsidies and living in HUD-assisted housing** for LGBTQI+ people differ based on intersecting identities like their race, ethnicity, age, disability status, and household type?

Areas of Focus through the Learning Questions

- Stability, Safety, and Anti-Discrimination
- Efforts to include LGBTQIA+ Individuals
- LGBTQIA+ and Homelessness
- Future research will expand as newly collected SOGI data becomes available

Thank you!