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EQUAL OPPORTUNITY DATA NEEDS

Final Report

by

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ABSTRACT

The collection and use of equal opportunity data in nine pertinent program areas within the Department of Housing and Urban Development were analyzed for an understanding of the following: how and by whom information is reported; its frequency and reliability; its adequacy to meet HUD's equal opportunity objectives; and its users after it has been processed.

It was apparent that in many instances there is a lack of information on the numbers and characteristics of those who apply and those who are eligible for program assistance, as opposed to those who actually receive it. This lack of information makes it difficult for Equal Opportunity program officials to assess the true impact of HUD programs on minorities and the disadvantaged.

1. EXECUTIVE SUMMARY

This study of equal opportunity data collection and data user needs within the Department of Housing and Urban Development was undertaken by Evaluation Technologies, Inc. in fulfillment of a contract jointly supported by the Office of Fair Housing and Equal Opportunity and the Office of Policy Development and Research. The study was designed to identify reported information on the beneficiaries of HUD programs and to determine whether it is adequate for an evaluation of the impact of these programs on minorities and the disadvantaged.

The report that follows represents the outcome of a year's research and investigation. Data was gathered during the period June to September 1975. The approach was to consider the nine program areas in the Department that were relevant to the purpose of the study and to examine the data collection and data manipulation processes for individual programs within each area. This was accomplished by independent study of the HUD organization and by personal discussions with officials of the Department who have responsibility for program operations and for data collection and report preparation.

Out of this came a detailed analysis of the reporting procedure for each program, showing the forms used, the sources supplying data, the types of information supplied, the frequency and reliability of reports, and the manner in which information is retrieved and used.

From this analysis it was possible to determine in which programs the reported information was adequate for HUD's equal opportunity objectives and in which programs it fell short. The detailed analysis of the reporting procedure provided indicators of how the data presently available or to be sought might be used for a more accurate assessment of the impact of HUD programs on minorities and the disadvantaged.

Generally, the forms and reporting requirements were found to yield a considerable body of information on the ethnic background, sex, and disadvantaged status (elderly, handicapped, disabled) of those benefiting from HUD assisted programs. But there was often a lack of information on individuals and families who had applied for program benefits and had been denied them, as well as on the numbers and characteristics of those who made up the eligible universe of each program.

Information reported and processed is not always used, perhaps because program managers may not regard equal opportunity requirements as part of their basic program objectives. HUD needs to publish some general guidelines for its staff, explaining the use of racial/ethnic data as a management tool and emphasizing that the responsibility for collecting such data should rest with the Assistant Secretary or Administrator of the program area.

The fact that available information is not always fully utilized, and that there is information that should be but is not reported, makes it difficult to accurately assess how HUD programs are affecting the minority and disadvantaged populations.

As an extension of this study, it is suggested that a sampling of HUD Regional and Area Offices for on-site investigations and discussions would provide HUD with a fuller assessment of EO data needs and data use at the field level, where most of the decisions on minority eligibility for participation are made.

The recommendations that follow are applicable to the nine pertinent program areas as a whole. HUD has certain equal opportunity data deficiencies that are outlined in each of the specific program areas. The reader interested in a specific program area should refer to that program area (see Chapter IV for details). In summary, the following recommendations emerge from this study:

- o Data should be estimated or collected for each major program on the number and race/sex/ethnicity of the total eligible population the program is intended to serve.
- o HUD should publish definitive guidelines on EO data use in program operations.
- o HUD should establish a more complete data collection system in the field of Minority Business Participation.
- o This study should be expanded to identify management data needs by a sampling of the regional offices.

II. INTRODUCTION

This report describes the results of a year's study of data user needs, data elements, and flow patterns for minority data within the Department of Housing and Urban Development. The study was conducted by ETI in answer to a request from the Office of Fair Housing and Equal Opportunity and the Office of Policy Development and Research, which sought information on the capability of HUD data collection analysis systems to provide data for determining the beneficiaries of HUD programs and assessing the impact of these programs on minorities and the disadvantaged. The project also required ETI to develop a plan for a system to enhance and institutionalize HUD equal opportunity objectives and policies and complement the HUD long range data automation plan.

HUD's equal opportunity objectives are clearly defined by several statutes and Executive Orders, which indicate Departmental responsibilities and the legal basis for action by the Assistant Secretary for Fair Housing and Equal Opportunity.

These objectives are:

- o to assure all Americans of equal and unhindered access to housing of their choice;
- o to ensure that no person is subjected to discrimination under, or is excluded from participation in, any HUD financed program or activity;
- o to provide, to the greatest extent feasible, training, employment, and business opportunities in HUD project areas;
- o to ensure that employees and applicants for employment in HUD direct or assisted contracts are not subjected to discrimination.

The work was divided into six separate tasks to be performed in sequence.

Task I required the preparation of a detailed work plan describing the types of data that would be identified, the program areas and data sources in HUD that would be investigated and analyzed, and the procedures and time table that would be followed for completion of the study.

Task II called for a detailed listing of EO data needs and their frequency, classified by HUD program area and program. Required were data that would indicate the beneficiaries of HUD programs and the impact of these programs on minorities, women, and the disadvantaged.

Task III covered the identification and analysis of EO data currently collected within the Department. ETI was required to examine existing Departmental data sources and data bases and to prepare a detailed

listing in which data for each program would be identified by several specified characteristics.

Task IV asked for a listing of data not currently collected or available but relevant to HUD E0 objectives.

Task V called for ETI's recommendations on satisfying additional data needs, discontinuing unnecessary and duplicative reporting, and making maximum use of existing Departmental data bases.

Task VI required ETI to develop a general long-range plan for the automation of E0 data processing.

III. METHODOLOGY

The proposed ETI work plan for the accomplishment of these six tasks was drawn up after a careful examination of study objectives and the means by which they could be achieved most effectively.

The starting point of endeavor was the tentative identification of program areas, programs, data sources, and data types to be investigated. Specific elements covered were:

- o determination of HUD organization structure;
- o determination of major functional areas making up the organization
- o selection of program areas to be focused upon during the study.

The second phase was an analysis of the HUD organization as its functions related to the study in order to clarify or reorder any information gathered during Phase I.

Following the study phase (Phase II), the work plan proposed a data-gathering phase (Phase III) whose objectives were:

- o to collect all data pertinent to the policies, goals, and user needs of HUD programs as these affected Equal Opportunity beneficiaries. (Data sources would include existing forms, computer files, and reports, as well as interviews with key personnel.)
- o to compile the resultant information in a manner that would facilitate data analysis.

Phase IV was the data analysis phase, designed to satisfy the requirements of Task III, IV, and V of the Scope of Work. This phase was to be the most important part of the study, since it would yield information in the three categories with a direct bearing on the evaluation of HUD program impact on minorities and the disadvantaged. These three categories were: EO data currently collected and available within HUD program areas; data relevant to EO objectives not currently collected or available; and new EO data recommended for collection as essential, and existing data recommended for elimination as duplicative.

The last phase, Phase V, concerned the formulation of a general long-range data processing plan for potential automation of EO data.

For the analysis of the HUD organization, the most recent organization chart, issued in April 1975, was used as a guide. The source documents consulted for information on program area functions and responsibilities were the latest available handbooks. For information on programs within the program areas, the guide was the 1975 Catalog of

Federal Domestic Assistance, supplemented by extensive interviews and discussions with those HUD staff members who were identified as having operational, data collection, or data preparation responsibilities for individual programs.

IV. PROGRAM AREAS

A. Housing Management

The Office of Housing Management:

- o manages all HUD housing programs, including abandoned housing and property conveyed to, or in the custody of, the Secretary;
- o collects and liquidates Title I property improvement loans;
- o manages mortgage insurance and interest reduction programs to provide housing for low and moderate-income families and for special groups such as the elderly and the handicapped.

The following are the relevant organizational elements within Housing Management:

Housing Programs meets the management needs of low-rent public housing, college housing, abandoned housing, congregate housing, and the special needs of the elderly and the handicapped.

Loan Management meets the management needs of HUD mortgage insurance programs, including Title I property improvement loans, multifamily projects, home properties, hospitals, nursing homes, and mobile homes.

Property Disposition develops and carries out policies concerning the maintenance and disposition of property conveyed to, or in the custody of, the Secretary.

Emergency Preparedness provides disaster housing under the guidance of the Administrator of the Federal Disaster Assistance Administration.

The data collection systems for programs in Housing Management generally yield adequate EO data. In a few instances, however, there is a lack of information about applicants; in others, an absence of data on minority group beneficiaries. These deficiencies are pointed out in the findings and recommendations that follow.

1. Sec. 236 Rental and Cooperative Housing for Lower Income Families. The existing reporting system does not analyze tenant versus applicant characteristics. If this report is to provide meaningful data, tenant versus applicant characteristics must be analyzed.
2. Sec. 232 Mortgage Insurance-Nursing Homes and Related Care Facilities. The existing data collection system does not provide information on the type and percentage of rejected

applicants. If minority participation in this program is considered significant, a new requirement for data on the number of applications received against the number of applications accepted should be considered.

3. Minority Contractor Goals Program. This affirmative action program overlooks the participation of women. Women should be added to the five minority categories to make a sixth category for which information is reported.
4. Multifamily HUD-Insured and Sec. 202 Housing. Since no information is reported on applications received but rejected, there is no means of relating the number of housing units filled to the number of applicants who sought to fill them. Also, there is no tally of female heads of households among occupants. Two modifications in the reporting form (HUD-9801) are suggested: (1) The addition of a column for "Female Head" to the minority categories; (2) The replacement of the "Filled During the Year" line by four entries showing, respectively, the number of applications received during the year, the number rejected, the number placed on a waiting list, and the number accommodated in the project.
5. Low Rent Public Housing. Details on those applications rejected or placed on a waiting list is a deficiency. It is recommended that the form Annual Recap of Characteristics be modified to provide a breakdown by minority category, family income, family size, and number of minors for both rejected applicants and those placed on a waiting list. It is also recommended that the frequency of collection should be half-yearly instead of annually to match HUD-51227 and HUD-51245.
6. Resident Employment for LHA's with 500 Units or More. There is no breakdown of employment by minority category and no identification of the number of minority group residents employed. The minority group category of incumbents for each kind of job should be reported in order to determine whether there is a discernable pattern in the employment of minority and non-minority residents.
7. Homeownership Counseling. The present reporting system does not provide any indication of the extent of minority participation in the program. Since it is a reasonable assumption that a majority of low and moderate income mortgagors prone to, or actually in, default would be from minority groups, the collection and reporting of data should identify the minority category of participants.
8. Tracking Home Mortgage Defaults. No information is available on the minority category of defaulting mortgagors. The addition of

a box for checking this information on the reporting form (FHA-2068) would reveal the percentages of minority category homeowners among the defaulters being tracked.

9. Sec. 237 Home Mortgage Insurance (Special Credit Risks). There is at present no reporting requirement on applicants or beneficiaries. If minority group participation in this program is significant enough to warrant the burden of data collection and analysis, a form similar to those used for Rent Supplement and Section 236 applicants might be considered.
10. Disaster Program - Temporary Housing. Data on minority categories and the elderly/handicapped are captured and maintained by the Disaster Field Office. These concerns are addressed on an exception basis, i.e., when a disaster strikes an area where either of these groups has been significantly affected, data can be immediately retrieved. But data on the two groups are not routinely reported to HUD Central Office. HUD Central Office should require the Disaster Field Office to submit the reports for evaluation.

B. Housing Production and Mortgage Credit

The Office of Housing Production and Mortgage Credit:

- o directs programs concerned with the production and financing of housing and the conservation and rehabilitation of the housing stock;
- o is responsible for HUD mortgage insurance programs covering loans by private lending institutions for the production and rehabilitation of housing, particularly for low and moderate income families and special groups such as the elderly and the handicapped.
- o directs the administration of the Government National Mortgage Association.

The following are the relevant organizational elements within Housing Production and Mortgage Credit:

Underwriting Standards develops technical policies for low-rent public housing and HUD land acquisition and disposition programs, and insures mortgages under the National Housing Act.

Publicly Financed Housing develops policies for the production of housing under the low-rent program, the college housing program, and the assistance program for Alaska housing.

Property Improvement and Mobile Homes develops policies for Title I property improvement and mobile home loans and insurance, and approves lending institutions and loan insurance applications.

Since HPMC functions and responsibilities are primarily related to the production phase of HUD housing programs, HPMC has little to do with the characteristics of applicants and beneficiaries who appear at the management phase.

The findings and recommendations that follow relate to two programs:

1. Title I Property Improvement and Mobile Home Loans. The sex of loan applicants, not recorded at present, should be included in the reporting form (FH-4).
2. Minority Contractor Opportunities (Public Housing). The low rent public housing construction program generates business opportunities which should benefit minority construction contractors and subcontractors. But HPMC has no system for tracking data on the numbers, skill categories, and racial characteristics of firms and individuals employed at construction sites. A reporting system is recommended that would require LHA's and private developers to provide information on the total number, type, and dollar value of contracts and subcontracts held by minority businesses.

C. Community Planning and Development

The Office of Community Planning and Development:

- o directs the administration of community development programs in accordance with Title I of the Housing and Community Development Act of 1974;
- o administers financial and technical assistance programs in planning, management, and training for States and local communities;
- o administers policies for the requisition and disposition of property and for HUD's relocation activities.

The following are the relevant organizational elements within Community Planning and Development:

Urban Program Coordination provides HUD liaison with the Bicentennial Administration and the Pennsylvania Avenue Commission, and coordinates CPD involvement with the Integrated Grants Commission.

Environmental Quality provides policy guidance in environmental planning and management.

Community Development develops standards and policies for community development programs and for the equitable treatment of those affected by property acquisition and relocation activities.

Planning and Management Assistance develops policies for improving the planning and management capabilities of State and local governments.

The CPD data collection systems generate adequate EO data, except in a few instances where information on female beneficiaries is lacking. These are described in the findings and recommendations that follow.

1. Relocation Assistance. The present data collecting mechanism does not purport to be a compliance monitoring system, nor to determine how persons are selected for relocation and relocation assistance. The present reporting form should be modified so that information is provided on: the number of female-headed families relocated; the relocation expenses paid to female-headed families; the replacement housing payments made to female homeowners; the rental and downpayment assistance given to female-headed households; and the number of female-owned businesses relocated.
2. Section 115 Grants and Section 312 Loans for Housing Rehabilitation. The sex of applicants is not identified on the reporting forms for these two programs. A box for this information

should be added. Also, the forms should provide for statements on rejected applicants; the form at present provides only for a statement on applications approved.

3. Community Development Block Grants (Lower Income Housing). The reporting form (HUD-7015.9) provides no data on female-headed households. It is recommended that this information be required for the three categories of housing needs, i.e., current residents, additional households expected, and displaced or expected to be displaced families. There should also be provision for data on households with female heads.

D. New Communities Administration

The New Communities Administration:

- o provides guarantees to back the issue of debentures by developers for the acquisition and development of land for approved new communities;
- o encourages the orderly development of well-planned, diversified, and economically sound new communities.

There are no administrative organizational elements.

This is a program area for which reporting requirements are in the development stage. Suggestions for additions which will yield more complete E0 data are provided in the recommendation that follows.

1. Title VII Loan Guarantees. Present reporting requirements do not cover the employment of women and minorities. The two schedules of the reporting form which capture employment data [Schedule D (Developer's Staff Report) and Schedule K (On-Site Employment)] should be modified to include information on women and minorities in the various job categories listed.

E. Federal Disaster Assistance

The Federal Disaster Assistance Administration:

- o provides direction and overall policy coordination for the Federal disaster assistance program activities delegated to the Secretary of HUD by the President;
- o advises on the mission, organization, and operation of the HUD disaster assistance program and the total Federal disaster preparedness and response capability;
- o provides overall direction, coordination, and management of Federal disaster preparedness and assistance activities;
- o provides direction to regional and field offices on disaster assistance activities.

The following are the relevant organizational elements within the Federal Disaster Assistance Administration:

Disaster Preparedness fosters disaster preparedness planning at all levels of government, develops orientation and preparedness training programs, and evaluates progress in the development of disaster programs.

Individual Disaster Assistance administers and coordinates disaster assistance to individual disaster victims, and reviews the effectiveness of programs for individual assistance.

Public Assistance administers and coordinates activities for the restoration of public facilities, develops and maintains public assistance regulations, policies and procedures, and investigates special problems arising in public assistance disaster emergency operations.

This program area has two programs: Disaster Assistance, and State Disaster Preparedness Grants. Our findings indicate that no EO data is being collected in either program and that none is needed, since operational responsibilities for disaster relief in times of emergency are discharged by other administrative entities, both within and outside HUD. The primary program area for disaster assistance to individuals within HUD is Housing Management (see page 9 of this report).

F. Fair Housing and Equal Opportunity

The Office of Fair Housing and Equal Opportunity:

- o provides overall direction and coordination of the HUD equal opportunity program and serves as the principal source of technical assistance on equal opportunity matters to the Assistant Secretaries and Regional Administrators;
- o provides primary liaison with governmental agencies, organizations, and individuals on major equal opportunity matters for HUD, and conducts special purpose projects such as the Indian, Spanish-speaking, and women's programs;
- o administers equal opportunity programs in connection with civil rights.

The following are relevant organizational elements within Fair Housing and Equal Opportunity:

Voluntary Compliance acts as a resource, information, and service agent for HUD and other Federal agencies, and for community organizations and local and national private industrial groups; develops program guidelines to spur voluntary action in equal opportunity efforts to ensure compliance.

Civil Rights ensures compliance and enforcement of civil rights requirements in the HUD equal opportunity program; develops enforcement standards and guidelines; performs program evaluation of HUD regional offices and State and local fair housing commissions; trains regional personnel; and assists Department of Justice in EO-related proceedings.

Program Standards and Analysis develops fair housing and equal opportunity policy; evaluates HUD programs for their impact on the disadvantaged, aged, female, and various minority groups; provides policy analysis of existing and proposed programs and legislative proposals; collects data for reports on the racial and ethnic characteristics of applicants, recipients and participants in HUD-aided programs.

Management and Field Coordination delivers the administrative and management services required for operating Fair Housing and Equal Opportunity programs at the national level.

The program area is responsible for administering a variety of civil rights laws and Executive Orders, including Title VIII of the Civil Rights Act of 1968, Section 109 of the Housing and Community Development Act of 1974, Executive Order 11063 concerning nondiscrimination in housing and related facilities, and Executive Order 11246 prohibiting the denial of equal employment opportunity by Federal and Federally-assisted contractors and subcontractors.

Data is currently being collected in two programs, the HUD program for Equal Opportunity in Housing and the Department of Labor program for Equal Employment Opportunity by Federal Contractors. But there are certain voids in the data that are explained in the findings and recommendations that follow.

1. Equal Opportunity in Housing. In the investigation of complaints the data collected is manually processed. This data should be automated to assist in determining the full impact of the program equal opportunity needs to be able to evaluate other HUD programs. This will insure the development of information about the cost, impact, equity and effectiveness of programs in achieving their equal opportunity goals. Program evaluation from an equal opportunity standpoint would provide a basis for improving program management, developing new equal opportunity direction, and providing a basis for equal opportunity policy formulation. There is a lack of socio-economic mobility data. It is difficult to determine what has happened to complainants. Demographic information is lacking. There is currently no followup system established. There is a need to reduce backlog in the reactive complaint system.

Under Title VI of the Civil Rights Act of 1964 there is a definite need to determine the volume of complaints by program type. This data would allow for an analysis and a subsequent impact study to determine the forms of complain and compliance activities. At present, regional compliance officers need some type of data to enable them to go to the problem area and fully investigate wherein the problem lies. Essentially what is needed is a good reporting system so that EO can select targets for compliance review.

HUD does not have a system for each program area to collection and report reliable data on minority business participation as required. A system should be developed and implemented for collection of minority business data Department-wide because there is a lot of money that is not tracked.

The program deficiencies that encourage discrimination against minorities occur primarily at the local level. HUD granting agencies, by failing to properly administer and supervise their assistance to prevent inequities, are actually implementing discrimination. Disparities in services to minorities under the HUD assistance programs are to some degree caused and, in a large part, perpetuated by the program areas' lack of knowledge about the racial/ethnic makeup of their clientele, and by their failure to have available information in planning and administration.

There is a need in this program to determine what the impact of the program is on a regular basis.

2. Equal Employment Opportunity by Federal Contractors. The information reported at present needs to be expanded to include: the dollar

value of prime contracts and subcontracts; the preconstruction conference date; the affirmative action submission approval date for prime contractors and subcontractors; the OFCC number; the construction date; and the identification number for prime contractor and subcontractors. The complaints processed are identified in addition to a community-wide craft by craft compliance review. The major activity involves applicant/project reviews and the review and approval of affirmative marketing plans.

G. Federal Insurance Administration

The Federal Insurance Administration administers:

- o the national insurance development program, which provides reinsurance against excessive losses during civil disorders;
- o the national flood insurance program, which provides flood insurance and guides future construction, where practicable, away from locations threatened by flood hazards;
- o the crime insurance program, which provides insurance against crime losses in any State in which the availability of such insurance is a critical problem.

The following are the relevant organizational elements within the Federal Insurance Administration:

National Insurance Development encourages and assists State insurance authorities and the insurance industry to develop and administer programs covering fire, crime, and other risks for private properties.

National Flood Insurance directs, in conjunction with the Assistant Administrator for Program Development, studies of demands for flood insurance and the effects of alternative programs; maintains interdepartmental liaison to assure proper administration of Section 1314 of the National Flood Insurance Act.

Crime Insurance reviews the market situation to determine whether crime insurance is available at affordable rates either through the normal insurance market or through a suitable program adopted under State law; provides appropriate means for policy issuance, servicing and claim settlement.

There are three programs in this program area: National Insurance Development, National Flood Insurance, and Crime Insurance. There are no apparent EO data requirements in the National Insurance Development and National Flood Insurance programs. The National Flood Insurance program is designed to provide flood insurance at rates affordable through a Federal subsidy. In return, communities must adopt and administer local measures that protect lives and new construction from future flooding.

The only program collecting EO data is Crime Insurance where, because of reluctance on the part of applicants to complete the minority data section of the form, the minority utilization data requested is suspected of being counter productive. The Federal Insurance Administration is currently conducting a test program in the southern part of the United States to ascertain what the impact on the program will be if this data is not required. A general complaint is that minorities feel they will

be prejudged by the adjuster upon filing a claim. There is no justification for discontinuing the collection of this data, but consideration should be given to collecting it in another form.

H. Interstate Land Sales Registration

The Office of Interstate Land Sales Registration:

- o designs programs to protect the public in connection with the sale of subdivision lots;
- o requires full disclosure of all relevant information to to buyers of such lots.

The following are the relevant organizational elements within Interstate Land Sales Registration:

Examination receives and examines all statements of record and property reports filed under the provisions of the Interstate Land Sales Full Disclosure Act; determines the adequacy of disclosure statements; and prepares and furnishes evidence in connection with hearings.

Policy Development and Control receives, examines and recommends approval or disapproval of developers' claims; develops and recommends legislative and regulatory changes; and coordinates efforts with those State agencies having responsibility for land sales functions.

Land Sales Enforcement receives, examines and makes determinations with respect to complaints arising from any alleged failure of a developer to comply with the requirements of the Act; negotiates the resolution of such complaints; recommends action to achieve compliance by developers and prepares and presents evidence in connection with hearings.

The single program in this program area is designed to correct a number of common abuses in land sales by requiring those engaged in interstate sale or leasing of land to register the offering with the Department and make a full disclosure to the buyer about the status of the property being transferred. There appear to be no EO data requirements under this program.

I. Policy Development and Research

The Office of Policy Development and Research:

- o analyzes and prepares recommendations to the Secretary on new and revised policies and programs to accomplish the mission of the Department and national housing and community development goals and objectives;
- o develops and administers a coordinated program evaluation system for the Department;
- o provides economic intelligence and analyses for Department use, including analysis and interpretation of statistical data;
- o develops and implements research and development efforts to assist in the solution of housing and community development programs and in the improvement of Department programs;
- o serves as the focal point within the Department for coordination of research and program evaluation efforts with other public and private organizations;
- o provides liaison with the Federal National Mortgage Association and exercises the regulatory power and authority of the Secretary with respect to the activities of that Association.

The following are the relevant organizational elements within Policy Development and Research:

Policy Development develops and recommends new or revised policies and programs with respect to the programs and missions of the Department.

Economic Affairs provides economic intelligence and analysis for the Department.

Research and Demonstration develops and implements research and demonstration program plans; develops and monitors research and demonstration contracts; disseminates the results of research and demonstration projects; and maintains liaison with other private and public authorities and institutions to assure awareness of parallel work and to avoid duplication.

Analysis and Evaluation reviews, analyzes and evaluates the impact and effectiveness of the programs and activities of the Department, and of compliance with established policy.

Program Development, Review and Administration assures that research programs are executed in an effective manner, and provides administrative support for all activities assigned to the Assistant Secretary.

For long range policy planning, HUD must have a profile of the population benefiting from the program decisions. By collecting data on eligible beneficiaries, in addition to statistics on actual participants, comparisons could be made that would indicate whether a reasonable number of eligibles from all segments of the population are being reached and served. Eligibility data is also an import tool in its own right for assisting program managers during pre-grant decision making to plan and assist in their outreach effort. There currently exists in HUD an urgent need for more guidance as to how ethnic data can be effectively tabulated and used for management and evaluation purposes. The actions that are recommended for this program area are that minority and female data should be collected on the contracts awarded through competitive bidding; data should be collected on the number of minority and female research workers who are working on HUD projects through grant programs; a clearly defined budget line item stating the goals of HUD research in the area of minority, female, disadvantaged, and aged should be included in the annual budget. General policy guidance should be furnished the Department on how the collected data and the analysis based on the statistics can assist such management tasks as locating targets of assistance, guiding outreach efforts, and evaluating the effectiveness of delivery.

Policy should be issued to establish a basic standard for ethnic data collection. This policy should require the submission of data on eligibles, applicants, and negative program efforts, in addition to beneficiary statistics.

V. LONG RANGE DATA AUTOMATION PLAN

1. Purpose. The purpose of Task VI was to develop a general long-range equal opportunity data automation plan from indications of potential automation of E0 data requirements identified in this study. This recommendation was to take into account the existing HUD long range plan for data automation and specify any requisite interface between existing program area data bases and essential equal opportunity data elements. However, it was not within the purview of this study to develop a detailed systems design. See Appendix II.

2. Performance Summary. In order to accomplish these requirements, it was necessary to analyze not only the HUD Long Range Plan for Data Automation but also the data suggested in Tasks III, IV and V. The Long Range Plan, published in June 1975 by the Office of ADP Systems Development of the Office of the Assistant Secretary for Administration, was studied not only for specific automated systems content, but also for systems objectives, policies, and philosophy.

3. General Results of Analysis

a. The long range plan has several basic tenets. The primary objective is not to develop a single management information system but a series of automated systems responsive to the needs of HUD. The philosophy of the system is to capture data at source and make it available through automated procedures to any interested users. This will eliminate redundancies in data collection modes and maximize transfer of information between data bases.

b. The study of the central office revealed the following:

(1) There are E0 data sets available in the program areas. However, to access these data requests must be coordinated through the office of the Assistant Secretary for Administration. Some of these data currently appear on hard copy reports which are not normally disseminated through the E0 office, other data is collected but is only accessible from existing systems through requests for a direct report with the required data elements, or through reformatting of existing data elements or reports. This step would require an examination of the input data sources as well as a review of end use requirements to determine which method would be most feasible or cost effective.

(2) There are those data requirements which are not currently collectable nor derivable from existing data bases, as determined by the limits of this study. For these requirements, modifications to current input documents or new forms development would be in order.

(3) And, finally, that many data sets are available at the area, insuring, and regional offices which are not disseminated to the central office. We recommend that a study of peripheral offices be conducted and that the E0 Policy/Staff then review our suggested data needs and

recommendations in conjunction with the second study, in order to approve policies and procedures and issue directives for the implementation of those approved. This might best be accomplished by the formulation of a task force with representatives of ADP Administration, EO, Policy and Research, and the program areas.

VI. FINDINGS

1. Because of the absence of applicant data in many programs, it is difficult to identify projects or areas where minorities, women, and the disadvantaged are being rejected disproportionately. Such data is essential for evaluating the success of each program in reaching its intended target population and for determining the extent to which HUD's EO objectives are being met or circumvented.
2. There is little or no evidence of data collection to provide estimates of the eligible universe for each program by race, sex, and disadvantaged status. (Here a distinction should be made between the eligible universe, the applicants, and the participants or beneficiaries of each program. They might be viewed as concentric circles, with the eligible population occupying the outermost circle, participants occupying the innermost and the applicants in between.) Selected data (from such sources as Census Bureau reports) is available on target characteristics but appears to be underutilized by HUD for measuring the social and economic composition of the eligible, as opposed to the participating population.
3. HUD has a basic policy on racial and ethnic data collection. The regulation requires that "Participants in Housing and Urban Development programs shall furnish such information as the Secretary may require concerning minority group identification to assist the Secretary in carrying out his responsibility for administering the national policies prohibiting discrimination and providing for fair housing."

The requirements essential for program areas are:

- a. The maintenance of a system for collecting and reporting racial/sex/ethnic data on actual program participants.
- b. Similar data on applicants.
- c. Annual statistical reviews of minority participation to determine whether equal opportunity objectives are being met.

Implementation procedures should also establish specific targets for consistency in the results obtained Department wide. The implementation should require the use of the data as a management tool.

4. At present, program managers appear to use available EO data on a discretionary basis, whereas they should be using it as a management tool to further HUD objectives. There is a need for departmental guidelines, reinforced by a series of in-house workshops or seminars, to make program managers aware of the reasons for the collection and processing of EO data and of how such data can be put to use.

VII. RECOMMENDATIONS

The recommendations that follow are applicable to the nine pertinent program areas as a whole. We have made individual recommendations for each of the nine in earlier reports of each program area to which reference should be made.

1. DATA SHOULD BE ESTIMATED OR COLLECTED FOR EACH MAJOR PROGRAM ON THE NUMBER AND RACE/SEX/ETHNICITY OF THE TOTAL ELIGIBLE POPULATION THE PROGRAM IS INTENDED TO SERVE.

In order to determine whether all those eligible for HUD assistance are actually being reached, the total eligible population for each program must be clearly identified by race, sex, income levels, and any other characteristics that define disadvantaged status. The collection and updating of this data from available sources within and outside the Department (e.g., Bureau of Census reports, HUD analyses, etc) should be the responsibility and concern of Fair Housing and Equal Opportunity. Reverting to the analogy of the three concentric circles, this would be data pertaining to the outer-most circle. It would enable instant comparisons with data on applicants and participants - which program areas are responsible for collecting and reporting - to determine whether minorities and the disadvantaged are getting a fair share of HUD assistance under a given program.

2. HUD SHOULD PUBLISH DEFINITIVE GUIDELINES ON EO DATA USE IN PROGRAM OPERATIONS.

The published guidelines for Department program personnel, supplemented by program area seminars and workshops, should explain and emphasize the basic use of EO data, showing how it can best be applied in specific instances and how it is highly relevant to management decisions. Since the organization of data collection within the Department requires the prior sanction and approval of the Assistant Secretary for Administration, the implementation of the guidelines should be a joint effort of Administration, Fair Housing and Equal Opportunity and individual program area Administrators. The Office of Policy Development and Research should assume primary responsibility for developing the guidelines in the first instance.

3. HUD SHOULD ESTABLISH A MORE COMPLETE DATA COLLECTION SYSTEM IN THE FIELD OF MINORITY BUSINESS PARTICIPATION.

HUD currently does not have a positive system for each program area to collect and report required data on minority business participation to the Office of Fair Housing and Equal Opportunity. The current reporting instructions allow for the offices to provide their "best estimates." The information that is received must be revised to provide more specific reporting requirements and suggested data sources. This field has no plan of action to obtain the required data. The research team could not

find a clear cut policy decision akin to action. There is no thrust here to develop a Department-wide program. HUD has a responsibility for administering the minority business enterprise program and should:

a. Develop and program guidelines for field offices and locally funded agencies in implementing voluntary compliance programs to expand business opportunities for minorities and low-income residents of HUD funded projects.

b. Develop and conduct special business opportunity projects with national minority and majority industry groups and with other Federal agencies.

c. Maintain liaison with other Federal agencies in the areas of business opportunities.

4. THIS STUDY SHOULD BE EXPANDED TO IDENTIFY MANAGEMENT DATA NEEDS BY A SAMPLING OF THE REGIONAL OFFICES.

This study should be expanded to identify management data needs at the field level. On-site investigations and discussions at a sampling of regional and area offices would provide HUD with a fuller assessment of the requirements of data users at the point of contact between applicants/beneficiaries and HUD personnel who serve them. The basic assumption is that the regions are generally alike and that each has a similar mission, even though individual requirements may vary from region to region. The material gathered from the sampling of field offices would be correlated in the regional and area offices not included in the sample.

APPENDIX I

PROGRAM ANALYSES

A. Housing Management

1. Sec. 236 - Rental and Cooperative Housing for Lower-Income Families

Type of Assistance: Interest-reduction payments; guaranteed/insured loans.

Justification : Project need must be based on area demographic data, supported by feasibility study data about zoning, environmental assessment, site value.

Eligible Beneficiaries : Families and individuals, including the elderly and handicapped or those displaced by government action or natural disaster, who fall within locally prescribed lower-income limits.

E0 Data Collected : Minority applicant family's household head, race of elderly, number of female-headed households, race of displacers, composition, employment data and income; monthly rental payments; special features (elderly, handicapped).

Forms : FHA-3131 Application for Tenant Eligibility Under the Sec. 236 Program;
FHA-3132 Recertification of Family Income and Composition Under the Sec. 236 Program.

Source : Applicant, through housing owner or manager.

Frequency of Collection : Half yearly.

Reliability : Data reviewed by housing owner or manager. Spot checks performed by area office.

Method of Retrieval : Automated.

Current Users : Area and regional offices, Loan Management, GAO, HUD Statistical Yearbook.

User Reports : (1) Number of families on Brooke Rent by status as elderly and minority group;
(2) Number of families with zero rent by status as elderly and minority group;
(3) Number of families with female head-of-household by status as elderly and minority group;
(4) Gross rent as a percentage of total income of families by status as elderly and minority group;
(5) Gross rent of families by status as elderly and minority group;
(6) Total annual income of families by status as elderly and minority group;

- (7) Assistance and benefits received by families by status as elderly and minority group;
- (8) Total annual income of families by status as elderly and family composition;
- (9) Total annual income of families by family composition and number of minors;
- (10) Number of families by size by status as elderly and minority group;
- (11) Number of families by age of head-of-household minority group;
- (12) Number of families receiving rent supplement by status as elderly and minority group;
- (13) Number of families with elderly head by status and minority group;
- (14) Number of minors by age groups and sex of head-of-household;
- (15) Gross rent by number of bedrooms, for families.

The statistical tables are used in HUD publications, special studies, i.e., Housing Policy Review Task Force, in response to congressional inquiries, and as a basis for changes in or needs for new programs. In addition, the region, State, and NHA tables are provided to region and area offices either on a recurring basis or as requested.

- Data Relevant to : Applicant characteristics versus tenant characteristics are not tabulated.
HUD's EO Objectives Not Currently Collected
- Findings : See above.
- Recommendation : That applicant characteristics versus tenant characteristics be analyzed.

2. Sec. 232 - Mortgage Insurance - Nursing Homes & Related Care Facilities

- Type of Assistance: Guaranteed/insured loans.
- Justification : Need for construction or rehabilitation of nursing home must be certified. Certifying agency must also be able to assure that licensing and operating standards are enforced.
- Eligible Beneficiaries : Patients requiring skilled nursing and/or intermediate care.
- EO Data Collected : Number of beds vacated and filled during the year, by minority category; number of patients occupying beds, by sex and age.

Form : HUD-9802 Occupancy Report: HUD-Insured Nursing Homes.

Source : Nursing home administrator.

Frequency of Collection : Annually.

Reliability : Data submission is dependent on the cooperation of individual nursing home administrators. Latest figure for response rate is 63 percent.

Method of Retrieval : Manual.

Current Users : Congressional and other inquiries seeking information on how funds are spent.

User Report : Nursing Home Occupancy (Sec. 232).

Data Relevant to HUD's EO Objectives Not Currently Collected : Total number of applications received during the year by minority category and expected source of payment.

Findings : The present data collection system for this program does not provide information on the type and percentage of rejected applications.

Recommendation : An additional data collection requirement--for the number of applications received against the number of applications accepted--should be considered if minority participation in the Sec. 232 program is significant.

3. Minority Contractor Goals Program

Type of Assistance: Promoting minority business participation in the property disposition program.

Justification : HUD's responsibility under Executive Order 11625.

Eligible Beneficiaries : Minority construction contractors and minority area managers.

EO Data Collected : Number and value of home and multi-family repair contracts, general contracts, and area management contracts awarded to minorities.

Form : HUD-9737 Minority Contractor Goals Program Report.

Source : Area or insuring office.

Frequency of Collection : Half yearly.

Reliability : High, because of source of information.

Method of Retrieval : Manual.

Current Users : Property Disposition and EO.
 User Report : Minority Contractor Goals Program Report.
 Data Relevant to HUD's EO Objectives Not Currently Collected : Numbers and types of contracts awarded to women entrepreneurs.
 Findings : The data collection system for this affirmative action program overlooks the participation of women.
 Recommendation : Women should be added to the five minority categories to make a sixth category for which data are reported.

4. Multi-family HUD-Insured and Section 202 Housing

(Component programs are identified by title (I), type of assistance (II), justification (III), and eligible beneficiaries (IV), in the note at the end of this program analysis.)

EO Data Collected : Housing units vacated and filled by minority tenants during the year; occupancy by the elderly and by subsidized families.
 Form : HUD-9801 Occupancy Report: Multifamily HUD-Insured and Sec. 202 Housing.
 Source : Housing owner or manager.
 Frequency of Collection : Annually.
 Reliability : Spot checks performed by area or insuring office.
 Method of Retrieval : Automated.
 Current Users : Insured Project Mortgage Division, Program Staff (HM), regional offices, EO.
 User Report : Multifamily occupancy tables by programs, and race/minority group and by insuring office and race/minority group.
 Data Relevant to HUD's EO Objectives Not Currently Collected : Sex of household head; sex and minority category of household head for rejected applications.
 Findings : No information is available on applications received but rejected during the year. Thus, there is no means of relating the number of housing units filled to the number of applicants. Also, there is no count of female heads of households among occupants.
 Recommendation : Two modifications of HUD-9801 are suggested:

(1) A column for "Female Head) to be added to the minority categories; (2) The replacement of the "Filled During the Year" line by four entries showing: applications received during the year, number rejected, number placed on waiting list, and number accommodated in project.

NOTE

- I Sec. 202 - Senior Citizen Housing Loan Program
- II HUD provides direct loans to sponsors to construct or rehabilitate rental housing for senior citizens (62 years or over) and for the handicapped regardless of age.
- III Applicants, who may be nonprofit sponsors, cooperatives, and certain public agencies, must prove they cannot get the necessary funds from other sources on equally favorable terms.
- IV Elderly persons and handicapped persons.

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- I Sec. 207 - Rental Housing
- II HUD-insured mortgages for individuals, partnerships, corporations, etc., sponsoring rental housing projects.
- III Identification of locality, general site, number of units, and rents to be charged, followed by a formal application for feasibility analysis by FHA.
- IV Moderate and middle-income families seeking rental housing in projects containing eight or more units of detached, semi-detached, row, walk-up, or elevator type multifamily structures designed primarily for residential use.

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- I Sec. 213 - Cooperative Housing
- II HUD-insured mortgages on cooperative housing projects of five or more dwelling units.
- III Sponsor discusses cooperative housing project with insuring office and, if feasibility findings are favorable, submits an application through an approved lender.
- IV Members of a housing cooperative who seek ownership of individual units in detached, semi-detached, row, or multifamily structures.

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- I Sec. 220 - Rental Housing in Urban Renewal Areas
- II HUD insures mortgages on the construction or rehabilitation of rental housing projects of two or more units in urban renewal areas.

III Initial conference with area or insuring office, followed by site appraisal and market analysis application. If proposal is worthy of further consideration, an application for conditional commitment is made.

IV Moderate or middle-income families seeking rental housing in urban renewal areas.

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I Sec. 221(d)(4)-MR - Rental Housing for Moderate Income Families

II HUD insures mortgages to finance construction or rehabilitation of rental or cooperative projects of five or more units for moderate and low-income families. Families displaced by urban renewal or other governmental action get preference.

III Preliminary conference between sponsor and area or insuring office. If project is feasible, an application for site appraisal and market analysis is made.

IV Low and moderate-income families seeking rental housing, with preference given to families displaced by urban renewal or other governmental action. Families are not required to report income to HUD.

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I Sec. 221(d)(3) - BMIR - Rental Housing for Low and Moderate Income Families

II HUD insures mortgages to finance construction or rehabilitation of rental or cooperative projects for families, individuals 62 years or older, and handicapped persons, whose incomes are determined by FHA to be low or moderate. Families displaced by urban renewal or other governmental action get preference.

III Same as for Sec. 221 - MR.

IV Same as for Sec. 221 - MR, except that families are required to report income to HUD.

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I Sec. 231 - Rental Housing for the Elderly and Handicapped

II HUD insures mortgages to finance construction or rehabilitation of rental housing for elderly or handicapped individuals.

III Identification of locality, type of project, number of units, rent to be charged, and amenities to be offered. Site appraisal and market analysis application is made and, if project is worth further consideration, is followed by application for conditional commitment.

IV Elderly or handicapped individuals seeking rental housing.

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- I Sec. 236 - Rental and Cooperative Housing for Lower-Income Families
- II HUD insures mortgages to finance construction or rehabilitation of rental or cooperative housing for lower-income families and persons who are 62 years or older or handicapped. Interest-reduction subsidies are made to the mortgagee on behalf of the mortgagor so as to reduce rentals to a basic rental charge.
- III Sponsors have a preapplication conference with area or insuring office, then submit documentation regarding property characteristics and borrower qualifications through the lender.
- IV Families and individuals, including the elderly and handicapped or those displaced by disaster or governmental action, must fall within locally prescribed income limits for lower income families to benefit from interest-reduction subsidies. Families with higher incomes may occupy units but cannot enjoy subsidy benefits.

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- I Sec. 233 - Experimental Housing
- II HUD insures mortgages for construction or rehabilitation of rental housing that incorporates innovative construction concepts.
- III Application must include purpose of the experiment, a complete description, plans for use of results, possible damages, and personnel involved.
- IV Families and individuals seeking rental housing.

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- I Sec. 234 - Condominium Housing
- II HUD insures mortgage loans for the acquisition of individual units in proposed or existing condominium projects.
- III Application, after preapplication conference with insuring office, is made to FHA-approved lending institution. Documentation regarding property characteristics and mortgagor qualifications are submitted with the application.
- IV Any family is eligible to apply.

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- I Sec. 223 - Housing in Older Declining Areas
- II HUD insures mortgage loans for purchase, repair, rehabilitation, and construction of housing in older, declining urban areas where normal eligibility requirements cannot be met.
- III Application must satisfy HUD that property is an acceptable risk, giving consideration to the need for providing adequate housing for low and moderate-income families.
- IV Low and moderate-income homeowners or tenants in declining urban areas.

- I Sec. 241 - Supplemental Loan Insurance for Multifamily Housing
- II HUD insures loans for alterations, repairs, additions, and improvements to any multifamily project financed with an FHA-insured mortgage.
- III Application by owner of any multifamily project, subject to FHA-insured mortgage, is made to approved lending institution.
- IV Tenants of multifamily housing projects financed by FHA-insured mortgage loans.

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- I Sec. 242 - Hospital Mortgage Insurance Program
- II HUD insures mortgage loans for financing hospital and related care facilities, including major movable equipment to be used in operating them.
- III Certification that hospital is needed and that minimum operational standards will be applied is required from Hill-Burton agency of the State before application can be considered.
- IV Persons in need of hospital care and treatment.

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- I Sec. 608 - War Housing (Inactive Program)
- II HUD-insured mortgages for production of war housing. New construction commitments were limited (after war ended) to applications received on or before March 1, 1950.

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- I Sec. 610 - Publicly Owned Housing
- II This section authorizes the insurance, under Sections 603 and 608, of mortgages on specified types of permanent rental housing sold by the Government.

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- I Sec. 803 - Mortgage Insurance for Military Housing
- II HUD provides for the insurance of rental housing mortgages on dwellings built on or near military installations for Armed Services personnel.
- III Certification by the Secretary of Defense that proposed housing is necessary for personnel concerned, that installation is part of permanent military establishment, and that there is no intention to curtail its activities.
- IV Armed Services personnel requiring rental housing.

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- I Sec. 810 - Armed Services Housing in Impacted Areas

- II HUD insures mortgages to finance housing for the Armed Services in impacted areas.
- III Builders apply to construct rental housing of at least eight dwelling units; qualified military or civilian employees apply for purchase of single-family homes.
- IV Military or essential civilian personnel working for the Armed Services, NASA, or the Atomic Energy Commission.

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- I Sec. 903 - One- and Two-Family Dwellings (National Defense Personnel)
- II HUD insures mortgagors for construction of one- and two-family dwellings on the sponsor's undertaking that preference in purchase
- & will be given to national defense personnel. The transaction is required to be an acceptable risk in view of national defense needs.
- III
- IV National defense personnel.

- - - - -

- I Sec. 908 - Rental Housing (National Defense Personnel)
- II HUD insures mortgages for construction of rental housing on the sponsor's undertaking that preference of opportunity to rent will
- & be given to persons engaged in national defense activities. The transaction is required to be an acceptable risk in view of national defense needs.
- III
- IV National defense personnel.

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- I Sec. 1002 - Mortgage Insurance for Land Development
- II HUD-insured mortgage loans for the development of land and improvements to land primarily for residential and related uses.

NOTE: No mortgages insured under this title after October 1, 1972.

5. Low-Rent Public Housing

Type of Assistance: Direct loans; project grants.

Justification : The Local Housing Authority (LHA) must support the application with population and housing data showing the need for the number of units requested. The proposed project must be approved by the local governing body.

Eligible Beneficiaries : Low-income families, including single persons who are elderly, disabled, displaced, or the remaining members of tenant families.

Forms : (1) HUD-52209 Report on Initial Occupancy;
 (2) HUD-51235 Report on Occupancy;
 (3) HUD-51227 Report on Families Moving Into Low-Rent Housing;

- (4) HUD-51245 Report on Regular Reexamination of Families in Low-Rent Housing;
- (5) No Annual Recap of Characteristics of Assigned Families Who Have Applied But Not Number Been Admitted to Low-Rent Public Housing.

EO Data Collected : (1) Dwelling units occupied by minority category tenants, including those who are elderly, disabled, displaced.
 (2) Dwelling units occupied by minority category tenants, including LHA employees required to live in the project, and the elderly and disabled.
 (3) Minority occupant family's composition and characteristics, income, status, monthly rent, relief or benefits.
 (4) Applications received but not housed, by minority category, by family income, by family size, by total minors, by family status, by female head, and by relief status.

Source : Local Housing Authority.

Frequency of Collection : (1) Monthly;
 (2) Annually;
 (3) Half yearly;
 (4) Annually.

Reliability : Spot checks performed by area office.

Method of Retrieval : Automated.

Current Users : Housing Programs (HM), Legal Counsel, Program Statistics (HM), HUD Statistical Yearbook.

User Reports : Tenant characteristics at the national, regional, State, and local levels.

Data Relevant to HUD's EO Objectives Not Currently Collected : (1) and (2): Total applications received and total rejected, by minority category and by elderly, displacement status, and sex of family head. There is a requirement for a tabulation of the needs of low-income families versus those accommodated.

Findings : A requirement exists for details on those applicants rejected or placed on a waiting list.

Recommendations : A modification in the Annual Recap of Characteristics form to provide breakdowns by minority category, family income, family size, and number of minors, for both rejected applicants and those placed on a waiting list. Also, the frequency of collection should be half-yearly instead of annually to match HUD-51227 and HUD-51245.

6. Resident Employment for LHA's with 500 Units or More in Management

Type of Assistance: Project grants.

Justification : HUD's obligation under Sec. 3 of the Housing and Development Act, 1968.

Eligible Beneficiaries : Residents of public housing projects with more than 500 units.

E0 Data Collected : None

Form : HUD-53150 Report on Resident Employment for LHA's with 500 Units or More in Management

Source : Local Housing Authority.

Frequency of Collection : Half yearly.

Reliability : Spot check by regional or area office.

Method of Retrieval : Manual.

Current Users : Housing Consumer Services (HM), Housing Programs (HMO, E0.

User Reports : Public Service Employment Report (showing number and kinds of jobs made available, by region and LHA).

Data Relevant to HUD's E0 Objectives Not Currently Collected : Number of minority residents employed in each of the listed job categories.

Findings : No breakdown of employment by minority category and no identification of the number of minority group residents employed.

Recommendation : In order to determine whether there is a discernible pattern in the employment of minority and nonminority residents, the minority categories of incumbents for each kind of job should be reported.

7. Homeownership Counseling

Type of Assistance: Encouraging low and moderate-income homeowners to seek professional counseling as mortgagors.

Justification : Reduction in number of defaulting home mortgagors.

Eligible Beneficiaries : Low and moderate-income mortgagors and potential mortgagors.

E0 Data Collected : None.

Form : HUD-9902 Counseling Agency Activity Report.

Source : Homeownership counseling agency.

Frequency of Collection : Quarterly

Reliability : Reporting agencies perform this as a voluntary service. About 60 percent of the 400 HUD-approved agencies report regularly.

Method of Retrieval : Manual.

Current Users : Housing Consumer Services Division (HM).

User Report : Counseling Agency Activities.

Data Relevant to HUD's EO Objectives Not Currently Collected : Information, by minority category, of numbers of

- potential and actual mortgagors in the agency's workload;
- potential mortgagors who purchased homes;
- delinquent mortgagors brought up to date with payments;
- defaulting mortgagors for whom relief was obtained;
- defaulting mortgagors for whom no relief was obtained.

Findings : There is at present no way of determining the extent to which minority group mortgagors are participating in the homeownership counseling program.

Recommendation : The collection and reporting of data under this program should be by minority category since it is a reasonable assumption that a majority of low and moderate-income mortgagors prone to, or actually in, default are from minority groups.

8. Tracking Home Mortgage Defaults

Type of Assistance: Assisting delinquent mortgagors to avoid foreclosure.

Justification : Reduction in number of foreclosed mortgages.

Eligible Beneficiaries : Defaulting mortgagors.

EO Data Collected : None.

Form : FHA-2068 Home Mortgage Default Notice.

Source : Lending institution.

Frequency of Collection : Monthly.

Reliability : High, because of source.

Method of Retrieval : Automated.

Current Users : Single Family Housing Division (HM).
 User Report : Home Mortgage Default Status.
 Data Relevant to HUD's EO Objectives Not Currently Collected : Racial breakdown of defaulting mortgagors in the four categories, i.e., mortgage reinstated, foreclosure imminent, foreclosure started, foreclosure completed.
 Finding : No data available on minority category identification of defaulting mortgagors.
 Recommendation : In order to determine the percentage of minority homeowners among the defaulters being tracked, a box for recording the minority category of the mortgagor should be added to the form.

9. Sec. 237 - Home Mortgage Insurance (Special Credit Risks)

Type of Assistance: Guaranteed/insured loans.
 Justification : Family income must be at least four times the mortgage payment. The applicant mortgagor must obtain counselling assistance from a HUD-approved agency before applying.
 Eligible Beneficiaries : Families who do not qualify for homeownership under regular FHA credit standards.
 EO Data Collected : None.
 Form : None.

NOTE: Our recommendation for the collection of applicant or beneficiary characteristics under this program is contingent on the volume of business. If minority group participation is significant and the added burden of data collection and analysis can be justified, a form similar to those used for Rent Supplement and Section 236 applicants might be considered.

10. Disaster Program - Temporary Housing

Type of Assistance: Project grants.
 Justification : Presidential declaration of a major disaster and physical inspection of damaged homes to verify claims for aid.
 Eligible Beneficiaries : Residents of disaster areas whose homes have been damaged or destroyed.
 EO Data Collected : None collected at Central Office.
 Forms : Scoreboard Disaster Temporary Housing Program (Phase I and II). HUD forms feed into this program.
 Source : Disaster Field Office.
 Frequency of Collection : Monthly.

Reliability : High.

Method of Retrieval : Manual.

Current Users : Assistant Secretary (HM), Emergency Preparedness (HM), Regional Emergency Services Officers.

User Reports : Disaster Relief Activities (Temporary Housing Programs).

Data Relevant to HUD's EO Objectives Not Currently Collected : Data on minority and elderly/handicapped disaster victims are not submitted to HUD Central Office. But they are captured and maintained by the Disaster Field Office and are available immediately on request.

Findings : See above.

Recommendations : HUD Central Office should require Disaster Office to submit data. Data on minority categories and the elderly/handicapped are captured and maintained by the Disaster Field Office. These concerns are addressed on an exception basis, i.e., when a disaster strikes an area where either of these groups has been significantly affected, data can be immediately retrieved. But data on the two groups are not routinely reported to HUD Central Office.

During the conduct of our study we discovered that there was a general misunderstanding in HUD about Federal disaster assistance. In an effort to provide some insight into HUD's dual role in Federal disaster relief, the following information, obtained from Housing Management, is provided for clarification:

DISASTER TEMPORARY HOUSING PROGRAM -
IMPACT ON MINORITIES, WOMEN, DISADVANTAGED

Description of Program

PL 93-288 Disaster Relief Act of 1974
 Section 404 - Temporary Housing
 Section 311 - Non-discrimination
 Section 310 - Use of Local Firms and Individuals

The Federal disaster assistance program is a coordinated and unified effort carried out by several departments and agencies under the broad direction of the Federal Disaster Assistance Administration (FDAA). For information on disaster assistance other than temporary housing, see PL 93-288 or contact FDAA, (202) 634-7860.

Temporary housing assistance is available when, following a disaster, the President (at the request of the Governor) declares a major disaster or emergency. In the last three years a disaster with temporary housing requirements has occurred on the average of once every twelve days (more than one hundred disasters). Since 1969, more than 63,000 families have been assisted at a cost of more than three hundred million dollars.

Impact on minorities, women and disadvantaged has several aspects:

(1) Some kinds of disasters hit predominantly disadvantaged persons, i.e., flooding usually occurs in the few blocks immediately adjacent to rivers or streams which are generally populated with lower income families.

(2) Minorities and disadvantaged and elderly persons are least able to cope mentally, physically and financially with disasters (i.e., elderly cannot do even minor clean up and are frequently most distraught at loss of housing, low income families have difficult time qualifying for loans to repair and frequently have no savings to carry them through a difficult period).

(3) Federal emphasis to assure non-discrimination impacts Disaster Field Office staffing, contracting, etc.

Benefits Provided

1. Temporary housing in the form of existing housing, mobile units or minimal repairs is provided to disaster victims made homeless by the disaster:

- Rent free for up to one year (after one year, must charge--but adjusted to final income).
- Rental basis after one year with rent adjusted according to family income.
- Temporary housing is available for minimum time required to obtain adequate alternate housing.

2. (HUD 1950) Mortgage or rental assistance for up to one year for disaster victims who are facing foreclosure or eviction as a result of financial hardship directly related to the disaster (i.e., disaster victim's place of business was destroyed and therefore he cannot make mortgage payments).

Process - Phase I

1. Application (HUD-9960) in person at a Federal Disaster Assistance Center.
2. Eligibility determination - physical inspection of damaged dwelling by HUD inspector.
3. Pre-placement interview - by phone or in person. Purpose is to identify a housing resource for the family and to identify special problems.
4. Identification and preparation of resource: existing resource/mobile home/minimal repair program.
5. Placement - signing of legal documents, counseling with applicant.

Process - Phase II

1. Management of occupants - providing maintenance service, dealing with problems with landlords, etc.
2. Recertification/counseling - assisting occupants to find alternate housing. Termination of occupants when adequate alternate housing is available. First recertification conducted 90 days after occupancy--others on a case-by-case basis.

3. Rental collection for occupants remaining in temporary housing after one year.
4. Termination - Departmental termination procedure (grievance).

DISASTER PROGRAM INITIATIVES IN THE AREA OF MINORITIES, WOMEN, UNDER-PRIVILEGED

1. DFO Staffing. DFO hiring policies must be non-discriminatory. DFO staffing pattern attempts to be representative of the minority population in the area. Special consideration is given to hiring minorities needed for outreach such as bilingual individuals to staff offices with contact with public.
2. Outreach. DFO attempts maximum outreach through use of minority organizations, media contacts, etc.
3. Non-discrimination. DFO follows policy of non-discrimination in regards to assignment of resources and follows through with HUD E0 staff when housing discrimination is uncovered.
4. Special assistance to elderly/handicapped/underprivileged. Priority consideration may be given to applicants in obtaining resources when individual circumstances warrant. Special adaptations (ramps, special steps, etc.) may be provided for handicapped. Special problems such as transportation, child care, etc., are addressed by referral to appropriate local agencies.
5. Minority Contractors. Utilization of minority contractors is encouraged in temporary housing contracting--usually mobile home site development and mobile home installation, repair contracts.
6. Interface with HUD E0, PIO and Community Services staff is encouraged to assure maximum assistance.

DATA COLLECTION AND MONITORING

Basic responsibility for administration of temporary housing program rests with Regional Administrator. EPS/HM has an overall monitoring function.

DFO DATA SYSTEM

Application HUD-9960

Internal Operational Logs

Master Application Register	HUD-9970A
Master Occupancy Log	HUD-9971

Reports

Applications Report	HUD-9978	(Scoreboard--only one that
Occupancy Report	HUD-9988	Central Office receives)

Related Forms

Priority Consideration Request	HUD-9976
Request for Adaptation of Mobile Unit	HUD-9983
Authorization to Locate Temporary Housing	HUD-9990
(Q&A's about Temporary Housing)	HUD-EP-10(3)

*Statistical reports plus a narrative are provided daily during Phase I operations. During Phase II such concerns are itemized on a monthly narrative report.

DF0 reports are monitored on a daily (Phase I) and monthly (Phase II) basis. Minority, etc., concerns are addressed on an exception basis.

11. Section 8 Housing Assistance Payments Program

Type of Assistance: Project grants.

Justification : Data to show that project is consistent with any applicable local Housing Assistance Plan or, in the absence of such a plan, that the project responds to the needs of lower income families residing or expected to reside in the community.

Eligible Beneficiaries : Very low-income families (incomes not exceeding 50 percent of area median income) and low-income families (incomes not exceeding 80 percent of area median income), including single persons who are elderly, handicapped, displaced, or the remaining member of an eligible tenant family.

EO Data Collected : Minority applicant's family composition, income, housing needs, unusual expenses, eligibility income.

Forms : HUD-52659 Application for Tenant Eligibility and Recertification;
HUD-52675 Report on Family Characteristics.

Source : Housing owner or manager/Public Housing Authority.

Frequency of Collection : Half yearly.

Reliability : Area office verifies all submissions before they are forwarded to HUD.

Method of Retrieval : Automated.

Current Users : HUD Secretary, Housing Programs (HM), Multifamily Activities (HPMC).

User Reports : A data base for the program is maintained. This base provides Housing Management with the means of determining the effectiveness of the program as well as answering congressional inquiries. In addition, information is provided through standard reports and an inquiring capability for 21 levels of HUD management.

Data Relevant to : None. Present system captures adequate data.
HUD's EO Objec-
tives Not Cur-
rently Collected

Findings : See above.

Recommendations : None.

12. Rent Supplements

Type of Assistance: Direct payments to project owners.

Justification : Project need must be documented as part of a work-
able program for community improvement or have
local official approval.

Eligible : Low-income tenants who, in addition, are elderly,
Beneficiaries handicapped, living in substandard housing, or are
victims of natural disaster.

EO Data Collected : Applicant data by minority category for family's
composition, family income, and employment; eligi-
bility requirements (including handicapped, elderly,
displaced, substandard housing); occupancy informa-
tion; assets and expenses.

Forms : FHA-2501 Application for Eligibility for Rent
Supplement.

Source : Applicant, through housing owner or manager.

Frequency of : Half yearly.
Collection

Reliability : Data reviewed by housing owner or manager. Spot
checks performed by area office.

Method of : Automated.
Retrieval

Current Users : Housing Programs and Program Statistics (HM), area
and regional offices.

User Reports : From this data base, national, regional, State, and
LHA statistics are generated on tenants. These sta-
tistics deal with family composition, race, income,
rent, etc. The statistical tables are used in HUD
publications, special studies, i.e., Housing Policy
Review Task Force, in response to congressional
inquiries, and as a basis for changes in or needs
for new programs. In addition, the region, State,
and LHA tables are provided to region or area offices
either on a recurring basis or as requested. (See
Sec. 236 of this section for listing of reports.)

Data Relevant to : None. Existing data collection is adequate for
HUD'S EO Objec- HUD's EO objectives.
tives Not Cur-
rently Collected

Findings : See above.

Recommendations : None.

B. Housing Production and Mortgage Credit

1. Title I Property Improvement and Mobile Home Loans

Type of Assistance: Guaranteed/insured loans.

Justification : HUD does not intervene in the selection of borrowers, who are approved by the insured lenders themselves. But HUD reserves the right to audit lenders' accounts to ensure compliance with FHA regulations.

Eligible Beneficiaries : Owners of property to be improved and those buying a mobile home as a principal residence.

Forms: FHA-4 Title I Loan Reporting Manifest;
FHA-341 Statistical Data Sheet for Mobile Homes Insured by FHA.

EO Data Collected : (1) Type and location of property, type of improvement, frequency and number of payments, net proceeds to borrower of purchase price, borrower's minority category.
(2) Family composition; income; age, sex, and occupation of head; previous residence type; acquisition cost of MH, down payment, amount financed, monthly payment; duration of loan.

Frequency of Collection : (1) Monthly;
(2) Quarterly.

Reliability : (1) Highly reliable; this is the basic source document for lenders to obtain HUD insurance.
(2) Submissions are erratic because reporting requirement is not enforced.

Method of Retrieval : Automated.

Current Users : Mortgage Activities, Legal Counsel.

User Reports : Title I Improvement Loan Characteristics; FHA-Insured Mobile Home Transaction Characteristics.

Data Relevant to HUD's EO Objectives Not Currently Collected : Sex of loan applicants on Form FH-4.

Finding : That the sex of the applicant should be included on Form FH-4.

Recommendation : Add a box to record the sex of loan applicants on Form FH-4.

2. Home Insurance Programs (Sections 203(b), 221(d)(2), 235(i))

Type of Assistance: (1) and (2) Guaranteed/insured loans.
(3) Guaranteed/insured loans and direct payments.

Justification : (1) and (2) Application, submitted through an FHA-approved lender for approval by A0 or I0, must be accompanied by documentation regarding property characteristics and mortgagor qualifications. (3) Preapplication conference with the lender submitting the application is suggested. Application is submitted to A0 or I0 with the required documentation regarding property characteristics and mortgagor qualifications.

Eligible Beneficiaries : (1) All families;
(2) All families, with special terms given to displaced families certified by the appropriate local government agency;
(3) Families and handicapped and elderly persons who fall within prescribed income and asset limits.

Forms : FHA-2900 Mortgagor's Application for Mortgagor Approval and Commitment for Mortgage Insurance;
FHA-700-30 Neighborhood and Minority Report.

E0 Data Collected : Mortgagor's and co-mortgagor's sex and minority category; dependents; assets, liabilities, and income; acquisition costs, mortgage payment, housing expenses, fixed payments; geographical location and neighborhood of property; mortgage approved/rejected; elderly/handicapped status.

Source : A0/I0.

Frequency of Collection : Weekly

Reliability : Total submissions on beneficiary universe enter the system. Rejection rate of invalid forms does not exceed ten percent.

Method of Retrieval : Automated.

Current Users : Housing Characteristics, MIS, Advanced Statistics and Computer Applications, (HPMC); E0.

User Reports : Use of Selected FHA Home Insurance Programs by Minorities; Racial Distribution of Insurance by Type of Construction; Total Effective Income (TEI) vs. Total Housing Expenses/Total Effective Income for Black Married Mortgagors; Race vs. THE/TEI for Married Mortgagors; TEI vs. Income Code by Race and Wife's Income Status; Insurance Application Acceptances/Rejections by Race.

Data Relevant to : None. Adequate data collection is being accom-
HUD's EO Objec- plished.
tives Not Cur-
rently Collected

Findings : See above.

Recommendation : None.

NOTE 1. The forms also capture data on the following home loan insurance programs but the volume of activity is considered too small to justify data extraction on a regular basis:

- Sec. 203(k) - Home Improvement Loans (for housing outside urban renewal areas)
- Sec. 203(i) - Homes in Rural Areas
- Sec. 203(h) - Homes for Disaster Victims
- Sec. 234(c) - Condominium Units
- Sec. 220 - Homes in Urban Renewal Areas
- Sec. 213 - Cooperative Housing Units
- Sec. 235(j) - Purchase of Rehabilitated Homes by Lower Income Families
- Sec. 233 - Experimental Homes

NOTE 2. Two forms - FHA-3100-3 (Application for Homeownership Assistance Under Sec. 235) and HUD-93101A (Recertification of Income and Family Composition) - are intended to capture specific applicant and beneficiary data for the Sec. 235 program. However, there is at present no data retrieval or manipulation and no reports are produced. The forms are sent for keypunching and the captured raw data are stored on tape. The reason for this is an unresolved organizational problem between Housing Management and Housing Production and Mortgage Credit as to which of them is responsible for data collection and analysis on the Sec. 235 program. When this problem has been resolved, there should be adequate EO data available on applicants and beneficiaries.

3. Minority Contracting Opportunities (Public Housing)

The low-rent public housing construction program, whether it involves the letting of contracts to private developers (turnkey) or the assumption of direct contracting responsibility by the local housing authority (conventional), receives large infusions of financial assistance from HUD. HUD assistance in turn generates business opportunities which should provide openings for minority construction contractors and subcontractors. However, HPMC at present has no way of knowing the extent of minority participation. It has no system for tracking data on the numbers, skill categories, and racial characteristics of firms and individuals employed at construction sites.

It is recommended that a reporting system be installed for the half-yearly submission of data by LHA's and private developers. This would provide information on the total number and dollar value of contracts and subcontracts awarded to minorities, by minority category and type of contract.

C. Community Planning and Development

1. Relocation Assistance and Real Property Acquisition Activities

Type of Assistance: Project grants.

Justification : Legally binding assurance from the local public agency that it will carry out its responsibilities under the Uniform Act.

Eligible Beneficiaries : Individuals, families, businesses, and non-profit organizations displaced by HUD-assisted projects.

EO Data Collected : Identification by minority category or relocated families, individuals, and organizations; relocation payments and expenses on behalf of all displaced minority families, individuals, and organizations.

Form : HUD-7083 Annual Report on Relocation and Real Property Acquisition Activities

Source : Local public agency.

Frequency of Collection : Annually.

Reliability : AO checks submissions for accuracy and completeness.

Method of Retrieval : Automated.

Current Users : Field Staff, GSA, Internal Management (CPD), Congress (on request).

User Reports : Annual Relocation and Acquisition Activities Report.

Data Relevant to HUD's EO Objectives Not Currently Collected : Data on relocated females (individuals, household heads, businesses), and data on payments and financial assistance to females.

Findings : The present data collection mechanism does not purpose to be a compliance monitoring system, nor to determine how persons are selected for relocation and relocation assistance. Nevertheless, certain minor modifications, even with this limitation, may enhance the data it yields.

Recommendations : We suggest that data be provided on:

- o Relocated families with female heads;
- o Relocation expenses to families with female heads;
- o Replacement housing payments to female homeowners;
- o Rental assistance to female-headed households;
- o Downpayment assistance to female-headed households.

o Female-owned businesses relocated.

2. Section 115 Housing Rehabilitation Grants

Type of Assistance: Project grants.

Justification : Proof of eligibility is essential and application must be approved by a public body (or by the area office in the case of a FAIR application).

Eligible Beneficiaries : Owner-occupants of residential properties up to four units in urban renewal, code enforcement, certified, FAIR, and CPD grant areas.

E0 Data Collected : Applicant's age, minority category, total dependents, total monthly income and expenses, and assets; age and remaining life of property; total dwelling units before and after rehabilitation; total rehabilitation costs.

Form : HUD-6260 Application for Sec. 115 Rehabilitation Grant.

Source : Public body/applicant.

Frequency of Collection : Monthly.

Reliability : Information is subject to audit by A0 and GAO. Reliability is estimated to be high.

Method of Retrieval : Automated.

Current Users : Regional offices, Assistant Secretary (CPD), E0, and Congress (on request).

User Report : Report on Sec. 312 Rehabilitation Loan and Sec. 115 Rehabilitation Grant Programs.

Data Relevant to HUD's E0 Objectives Not Currently Collected : Sex of applicant owner-occupants.

Findings : The omission noted above.

Recommendations : Add a box for the identification of the applicant's sex. Also, provide for a statement on rejected applications; the form at present provides only for a statement on applications approved.

3. Section 312 Housing Rehabilitation Loans

Type of Assistance: Project loans.

Justification : LPA's with authority to do so approve applications submitted to them; other LPA's pass applications to the A0 for approval.

Eligible Beneficiaries : Owners of residential property in urban renewal, code enforcement, certified, FAIR, and CPD grant areas.

Forms : HUD-6230 Application for Rehabilitation Loan - Owner-occupied Property Containing 1-4 Units;
 HUD-6243 Application for Rehabilitation Loan - Investor-owned Residential Property or Mixed Use Loan.

E0 Data Collected : Minority applicant's monthly income and expenses; dependents; dwelling units before and after rehabilitation; total funds from other sources; loan applied for and number of months; age, remaining life, and unpaid debt on property; cost of improvements.
 Minority applicant's total loan and number of months; dwelling units before and after rehabilitation; total rehabilitation cost; existing debt on property; total income, taxes, and operating expenses on property; age and remaining life of property.

Source : Public body/applicant.

Frequency of Collection : Monthly.

Reliability : Forms pass through Regional Accounting Office for prevalidation.

Method of Retrieval : Automated.

Current Users : Regional offices; Assistant Secretary (CPD), E0, and Congress (on request).

User Report : Report on Sec. 312 Rehabilitation Loan and Sec. 115 Rehabilitation Grant Programs.

Data Relevant to HUD's E0 Objectives Not Currently Collected : Sex of applicant owners.

Findings : The omission noted above.

Recommendations : Same as for Sec. 115 Grants.

4. Section 701 Comprehensive Planning Assistance (Work Study Projects)

Type of Assistance: Project grants.

Justification : Prior approval of both the work agency and the work tasks must be obtained from HUD, and the grantee and the educational institution must arrange for trainees to earn graduate credit for their work experience.

Eligible Beneficiaries : States, cities over 50,000, "urban counties" as defined in the Act, councils of government, tribal groups, and other governmental units with special planning needs.

E0 Data Collected : Race and sex of trainees in work study project.

Form : HUD-6785.4 Summary Report on Work Study Projects.

Source : Regional office.

Frequency of Collection : Annually.

Reliability : Data obtained by Program staff from grantees.

Method of Retrieval : Manual.

Current Users : Community Development Program, Assistant Secretary.

User Report : National Summary Report on Work Study Projects.

Data Relevant to HUD's E0 Objectives Not Currently Collected : None. Adequate data are captured.

Findings : See above.

Recommendations : None.

5. Community Development Block Grants (Lower Income Housing)

Type of Assistance: Formula grants.

Justification : Housing Assistance Plan must contain survey of housing conditions, housing needs of low-income families, annual housing assistance goal, and general locations of low-income housing.

Eligible Beneficiaries : Cities in SMSA's with populations over 50,000, "urban counties" as defined in the Act, and certain cities with populations under 50,000.

E0 Data Collected : Lower income housing needs, by minority category, of current residents, displaced families, and additional households expected, who have large families, are elderly and handicapped, or are non-elderly and handicapped.

Form : HUD-7015.9 Housing Assistance Needs of Lower Income Households.

Source : Applicant communities.

Frequency of Collection : Annually.

Reliability : High, because data sources used by applicants are known to be available to HUD.

Method of Retrieval : Automated.

Current Users : Community Development Programs, Congress.

User Report : No standard report at this time. First annual report was to be presented to Congress December 31, 1975.

Data Relevant to HUD's EO Objectives Not Currently Collected : Data on households with female heads.

Findings : See above.

Recommendations : In the three categories of housing needs, i.e., current residents, additional households expected, and displaced or expected to be displaced families, there should be provision for data on households with female heads.

D. New Communities Administration

1. Title VII Loan Guarantees

Type of Assistance: Guaranteed/insured loans.

Justification : Preapplication proposal outlining internal development plan, mix of low and moderate income housing, affirmative equal opportunity program, etc. After review, HUD may accept a formal application.

Eligible Beneficiaries : Private developers and public land development agencies authorized by State or local law.

E0 Data Collected : Types and dollar values of contracts and subcontracts awarded to minority businesses.
Racial composition of population in SMSA, among first move-ins, and in project.

Forms : Reporting schedules have recently been developed and do not have form numbers as yet. They are part of a Statistical Progress Report (SPR) at present.

Source : New community developer.

Frequency of Collection : Annually.

Reliability : This is a revised reporting requirement implemented three months ago. There are no audit or spot checks at this time.

Method of Retrieval : Manual.

Current User : New Communities Administration.

User Report : Statistical Progress Report.

Data Relevant to HUD's E0 Objectives Not Currently Collected : Number of minority and women employees on the developer's staff and in on-site jobs.

Finding : Reporting requirements do not cover the employment of minorities and women.

Recommendation : The two schedules which capture employment data, namely, Schedule D (Developer's Staff Report) and Schedule K (On-Site Employment) should be expanded to include particulars of minorities and women in the various job categories listed.

E. Federal Disaster Assistance

This program area has two programs: Disaster Assistance and State Disaster Preparedness Grants. There are no Disaster Assistance EO data requirements because the applicants in the programs are the State or local governments submitting a project application or request for direct Federal assistance under the Disaster Relief Act of 1974. The State Disaster Preparedness Grants require clearinghouse review under OMB Circular No. A-95 (revised). Therefore, public agencies charged with enforcing or furthering the objectives of State and local civil rights laws have the opportunity to review and comment on the civil rights aspects of the projects for which the assistance is sought.

1. Disaster Assistance

Type of Assistance: Project grants; use of property, facilities and equipment; provision of specialized services.

Justification. : Services are provided and grants and contributions are made available for suppression of forest or grassland fires, and for post-disaster assistance, including repair or replacement of public facilities, and private nonprofit facilities; removal of wreckage and debris; performance of essential protective work on public and private lands; emergency shelter and temporary housing for displaced individuals and families; assistance to unemployed individuals; loans to local governments suffering substantial loss of tax and other revenues; emergency transportation service, emergency communications; crisis counseling; survey and allocation of construction materials; and individual and family grants to cover disaster-related expenses or serious needs of persons adversely affected by a major disaster.

Governor makes a request for declaration of an emergency or a major disaster by the President. Request for assistance must be made by the Governor in accordance with Part 2205.24, Part 2205.36, or Part 2205.41, Title 24 of the Federal Disaster Assistance Regulations.

The Administrator of FDAA assigns funds from the President's Disaster Fund to FDAA Regional Directors for all disaster-related expenditures. The regional director approves grants on the basis of project applications filed by eligible applicants. Other Federal agencies are also reimbursed from the President's Disaster Fund for disaster work performed at FDAA's direction.

Eligible Beneficiaries : State and local governments in declared emergency or major disaster areas; owners of selected private nonprofit facilities, and individual disaster victims.

E0 Data Collected : There are currently no HUD forms used to collect equal opportunity data in this program.

Finding : There currently is no relevant equal opportunity data being collected in this program.

Recommendation : None. The primary program area for disaster assistance to individuals within HUD is Housing Management (see page 41 of this Appendix).

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2. State Disaster Preparedness Grants

Type of Assistance: Project grants

Justification : This development grant--aggregate maximum \$250,000 per State--may be used for such disaster-related programs as response planning in general or for specific contingencies, revision of State statutes or other authorities, mutual aid agreements, vulnerability analyses, systems design, training and exercises, reviews and critiques, and public education and information. Grant funds may not be used to procure or repair equipment, materials, or facilities except as required for grant administration.

A State Work Plan and annual budget information form are required with the formal application. A pre-application conference with the FDAA Regional Office is needed to discuss the State Work Plan in draft. The draft should also be reviewed by other State agencies involved or affected. FDAA technical assistance is available for application preparation.

Governor's letter requesting grant from appropriate FDAA Regional Office will precede or accompany application package. Letter must designate State agency to be involved and designate State disaster preparedness coordinator. Application package also includes application, annual budget information, State Work Plan, a standard assurance certification of compliance with appropriate legal and administrative requirements. The assurances include compliance with Title VI of the Civil Rights Act of 1964 (PL 88-352).

The FDAA Regional Directors make final decisions to approve grants to the State.

Eligible Beneficiaries : All States are eligible (including District of Columbia, Puerto Rico, Virgin Islands, Guam, American Samoa, Trust Territories of the Pacific Islands and the Canal Zone). Request must be in writing from Governor or authorized representative.

E0 Data Collected : There is no E0 data currently collected in this program. This program requires clearinghouse review under OMB Circular No. A-95 (revised). Therefore, public agencies charged with enforcing or furthering the objectives of State and local civil rights laws have the opportunity to review and comment on the civil rights aspects of the project for which the assistance is sought.

Finding : There currently is no relevant E0 data being collected in this program.

Recommendation : None.

F. Fair Housing and Equal Opportunity

1. Equal Opportunity in Housing

- Type of Assistance: Investigation of complaints.
- Justification : Subject to legislative restrictions as to coverage, individuals are assured an equal opportunity to choose housing suited to their needs and financial ability in the area in which they desire to live, without discrimination because of race, color, religion, sex or national origin. Investigations are conducted into alleged violations and action is taken to conciliate the complainants. Voluntary compliance with the fair housing law is encouraged so that buildings, real estate agents and brokers, lending institutions, and similar organizations will make housing available on a nondiscriminatory basis.
- Complaints may be sent to any HUD regional, area, or insuring office, or to HUD's Washington office.
- Eligible Beneficiaries : Any individual aggrieved by a discriminatory housing practice may file a complaint with the Department of Housing and Urban Development. An individual may file a suit in a Federal or local court seeking injunctive relief, actual damages, and not more than \$1,000 in punitive damages, together with court costs and reasonable attorney fees. Litigation may also be initiated under certain conditions by the Attorney General.
- EO Data Collected : Equal opportunity complaint and compliance.
1. Forms : HUD 903 Housing Discrimination; and HUD 903A Complaint (Spanish).
- Source : Aggrieved person or organization.
- Frequency of Collection : Submitted as complaint is realized; can be accepted in any form, i.e., letter or phone call. It will be transferred to the form for uniformity.
- Reliability : Each complaint is investigated and reports are prepared.
- Method of Retrieval : Manual.
- Current User : Investigator.
- User Reports : Recorded on monthly logs. HUD Form 930 is the basic essential instrument for receipt of a complaint under Title VIII of Civil Rights Act of 1968.

2. Forms : HUD 930.1 Regional Monthly Status Summary of Complaints Received and Compliance Reviews Conducted, Title VIII of Civil Rights Act of 1968.

HUD 930.2 Regional Monthly Status Summary of Complaints Received and Compliance Reviews Conducted, Title VI of the Civil Rights Act of 1964.

HUD 930.4 Regional Monthly Status Summary of Complaints Received and Compliance Reviews Conducted, Executive Order 11246.

HUD 930.5 Regional Monthly Complaint and Compliance Review Closing Log.

Source : Regional milestone actions in processing of complaints.

Frequency of Collection : Monthly.

Reliability : Logs are reviewed as to completeness and accuracy by EO Central Office. Periodic evaluations are made of files of regional offices by HUD EO staff.

Method of Retrieval : Manual.

Current User : Regional office and Central Office Equal Opportunity.

User Reports : Backup for statistics. Only overview of caseloads in regions. Tool for keeping account of complaints. HUD Statistical Yearbook. Complaint and Compliance Activity Report. Selected Data Regional Report.

3. Forms : HUD 914 Section 8 Equal Opportunity Housing Plan.

Source : Public housing authority.

Frequency of Collection : As required

Reliability : Plan is reviewed to determine whether or not actions are in compliance with approved affirmative marketing plans.

Method of Retrieval : Manual.

Current User : Area, insuring and regional offices.

User Report : Compliance reviews and information for other reports.

4. Forms : OMBE 91 Minority Business Enterprise Program Data Form

Source : Program area control office.

Frequency of Collection : Semi-annually.

Reliability : There is no check made of reliability. Report is based solely on estimates.

Method of Retrieval : Manual.

Current User : Central EO office.

User Report : Information for OMBE report. Evaluation and analysis of impact. Used for information in one-time reporting.

5. Forms : HUD 930 Minority Business Participation

Source : Regional, area or insuring office.

Frequency of Collection : Quarterly.

Reliability : No check is made of reliability. Based on estimates.

Method of Retrieval : Manual.

Current User : Central EO office.

User Reports : Information for OMBE report. Evaluation and analysis of impact. Used for information in one-time reporting.

6. Forms : 935.1 Monthly Sales Report - Insured Home Mortgage Programs

935.2 Affirmative Fair Housing Marketing Plan

935.3 Certification of Intent Not to Market Housing.

Source : 935.1 - Applicant.

935.2/935.3 - Sponsors of multifamily projects and developers of housing under the house mortgage insurance programs.

Frequency of Collection : 935.1 - Monthly.

935.2/935.3 - As required.

Reliability : 935.1 - Plan is reviewed during compliance reviews.

935.2/935.3 - Plan is reviewed to determine whether or not actions are in compliance with approved affirmative marketing plan and the affirmative fair housing marketing regulations. Each field office has undertaken a self-evaluation of its affirmative marketing monitoring system to determine whether the system is an effective and workable monitoring vehicle.

Current User : Area or insuring office.

User Report : Public record for compliance reviews.

Data Relevant to :
HUD's EO Objec-
tives Not Cur-
rently Collected

1. Equal Opportunity in Housing
HUD Forms 903, 903A

and

930.1 - 930.5 : The data collected on this program is manually processed. This data should be automated to assist in determining the full impact of the program EO needs to be able to evaluate other HUD programs. This involves the development of information about the cost, impact, equity and effectiveness of programs in achieving their EO goals. Program evaluation from an EO standpoint would provide a basis for improving program management, developing new EO direction, and providing a basis for EO policy formulation. There is a lack of socio-economic mobility data. It is difficult to determine what has happened to complainants. Demographic information is lacking. There is currently no followup system established. There is a need to reduce backlog in the reactive complaint system.

2. Title VI of Civil Rights Act of 1964. Nondiscrimination in programs or activities receiving Federal financial assistance

: HUD Form 930.2. There is a definite need to determine the volume of complaints by program type. This data would allow for an analysis and a subsequent impact study to determine the forms of complaint and compliance activities. At present, regional compliance officers need some type of data to enable them to go to the problem area and fully investigate wherein the problem lies.

Regional managers need to have printouts of HUD 0901 for subsidized housing in each region.

Need for percentage of minority population in census tract.

Need for percentage of minority population in project. HUD Form 51235, Low Rent Public Housing, should be computer analyzed to allow the regional manager to pick the project that would provide him with the payoff for compliance review.

Essentially what is needed is a good reporting system so that EO can select targets for compliance review.

3. Section 8 of Community Development Act - HUD Form 914
 - : This is a new report and apparently meets HUD's objectives.
4. Minority Business Participation - HUD Form 938
 - : a. Add the following EO data elements:
 - (1) Dollar amount and type, by trade, of all construction contracts broken down by racial and sexual identity of ownership.
 - (2) Dollar amount and type of all non-construction contracts by racial and sexual identity of ownership.
 - b. Minority enterprise is not identified in all programs.
 - c. HUD does not have a system for each program area to collect and report reliable data on minority business participation as required. A system should be developed and implemented for collection of minority business data Department-wide because there is a lot of money that is not tracked.
5. Fair Housing - HUD Form 935.1 to 935.3
 - : The following additional data elements are required:
 - a. Number of times affirmative marketing plans rejected.
 - b. Anticipated start of rental data.
 - c. Date HUD 9801 due.
 - d. Date of last HUD 9801 received.
 - e. Percentage of occupancy shown in latest HUD 9801.
 - f. Start dates for advertising.
 - g. Final sales report by ethnic breakdown.

Findings:

1. There is a lack of socio-economic mobility data. It is difficult under the current system to track complainants.
2. Demographic data information is lacking.
3. The program deficiencies that encourage discrimination against minorities occur primarily at the local level. HUD granting agencies, by failing to properly administer and supervise their assistance to prevent inequities, are actually implementing discrimination.

4. Disparities in services to minorities under the HUD assistance programs are to some degree caused and, in a large part, perpetuated by the program areas' lack of knowledge about the racial/ethnic makeup of their clientele, and by their failure to use available information in planning and administration.
5. There is a need in this program to determine what the impact of the program is on a regular basis.
6. There is a need to determine the volume of complaints by program type under Title VI of the Civil Rights Act of 1964. This data would allow for an analysis and a subsequent impact study of complaints and compliance activities. Regional compliance officers need some type of data to enable them to go to the problem area and fully investigate it.

Recommendations:

1. That additional E0 data relevant to HUD's E0 objectives as shown above, be collected.
 2. That a system be established for each program area to collect and report reliable data on minority business participation.
 3. That a system be devised to determine the volume of complaints by program type.
2. Equal Employment Opportunity by Federally Assisted Construction Contractors Under E0 11246

Type of Assistance: Contract compliance program to carry out the requirements of the Executive Order with respect to HUD-assisted construction projects. The assistance is in the form of:

- a. Pre-award and presentation conferences.
- b. Review and approval of affirmative action programs and bid certifications.
- c. Monitoring of construction project to visually determine compliance with minority utilization goals.
- d. Conduct of compliance reviews and show cause meetings.
- e. Investigation of complaints.
- f. Affirmative action meetings with contractor associations, union officials, minority contractor organizations, and citizen and community representatives and groups.

Justification : Under the provisions of E0 11246, the Department of Labor is assigned responsibility for administering the order which it carries out through its Office of Federal Contract Compliance Programs (OFCCP).

HUD, as a compliance agency, has been delegated responsibility for establishing a contract compliance program to carry out the requirements of the EO with respect to HUD-assisted construction projects. The Assistant Secretary for Fair Housing and Equal Opportunity, as the Department's designated contract compliance office, is charged with the responsibility for developing and administering the Department's compliance program under EO 11246.

Eligible Beneficiaries : Any individual employed by a Government contractor or subcontractor or in Federally involved construction who feels he has been the subject of discrimination because of race, religion, color, sex, or national origin. The principal objective of the HUD contract compliance program is to eliminate all employment discrimination based on race, color, sex or national origin in HUD-assisted construction projects, as well as to assure that contractors act affirmatively to provide the broadest range of employment and training opportunities for minorities and women in all phases of HUD programs and contracting opportunities for minority contractors.

Data Collected

- 1. Forms : None. A written affirmative action plan is required to be submitted to HUD for approval by the prime contractor.
- Source : Prime contractor on projects costing \$1 million or more; subcontracts of \$100,000 or more on projects costing \$1 million or more.
- Frequency of Collection : Within 15 days after execution of the contract or the preconstruction conference, whichever is earlier.
- Reliability : Performance of the contractor is reviewed periodically during the course of construction to determine if contractor is complying with the plan or with the applicable bid conditions in a bid condition area.
- Method of Retrieval : Manual.
- Current User : Area equal opportunity director.
- User Report : OFCC basis for orientation conformance inspection. A measuring instrument for the compliance review. HUD regional office compliance activity.
- 2. Form : HUD 21D Contractual Activity (see Note)
- Source : Area and regional office.

Frequency of Collection : Monthly.

Reliability : Information is verified if contracting activity is successful bidder.

Method of Retrieval : Manual

Current User : OFCC, Central and local office of HUD.

User Report : HUD regional office for incorporation into other reports.

3. Form : HUD Form 21D (see Note). Post Contract Implementation.

Source : Regional office.

Frequency of Collection : Completed on the basis of the agency's activities concerning the invitation for bid and the resulting contract.

Reliability : Information verified by HUD investigator.

Method of Retrieval : Manual.

Current User : OFCC; HUD Regional and Central EO office.

User Report : This series of reports is used to produce the following statistical information for the Assistant Secretary for Equal Opportunity, HUD:

- Monthly Status Summary of Title VIII Activity;
- Monthly Status Summary of Title VIII Complaints. HUD-EO Closures;
- Monthly Status Summary of Title VIII Conciliation Agreements;
- Monthly Status Summary of Title VI Complaints;
- Monthly Status Summary of Title VI Complaints. HUD-EO Closures;
- Monthly Status Summary of Title VI Compliance Reviews Fiscal Year;
- Monthly Status Summary of Title VI Compliance Reviews. HUD-EO Closures;
- Monthly Status Summary of EO 11246 Complaints. HUD-EO Receipts and Closures;
- Monthly Status Summary of EO 11246 Compliance Reviews Fiscal Year;
- Monthly Status Summary of EO 11246 Compliance Reviews. HUD-EO Closures;

Monthly Status Summary of EO 11478 Complaints;
 Title VIII Aging Report;
 Title VI Aging Report;
 Executive Order 11246 Aging Report;
 Executive Order 11478 Aging Report;
 Cumulative Summary of Complaints Received Fiscal
 Year;
 Cumulative Summary of Complaints Closed, Fiscal
 Year.

4. Forms : HUD Form 21D (see Note). Optional Form 66 as prescribed by the Department of Labor.
 Monthly Manpower Utilization Report.
- Source : Prime contractor.
- Frequency of Collection : Monthly.
- Method of Retrieval : Manual.
- Current User : Federal Compliance Agency; Area Coordination; HUD Regional Officer.
- User Report : Used for incorporation into other report requirements as required.
- EO Data Relevant to HUD's Objectives Not Currently Collected : There is a need for the following additional data elements:
- a. Dollar amount of prime contract and subcontracts.
 - b. Preconstruction conference date.
 - c. Affirmative action submission approval date for prime contractor and subcontractor.
 - d. OFCC number.
 - e. Construction start date.
 - f. Employer identification number for prime and subcontractors.
- Findings : That complaints processed are identified in addition to a community-wide craft by craft compliance review. The major activity involves applicant/project reviews and the review and approval of affirmative marketing plans.
- Recommendation : That the additional data required be collected to satisfy deficiencies identified.

NOTE: HUD Form 21D is a page for mounting forms single reduction 8x10.

G. Federal Insurance Administration

1. Flood Insurance

Type of Assistance: Insurance.

Justification : Flood insurance is a joint venture between the Federal Government and the private insurance industry. Insurance policies are sold and the risk is shared by the private insurance industry. Flood insurance is available in eligible communities for residential properties, and for small business properties in an area identified as a flood-hazard area and for which rating studies have been completed. The owner will pay a subsidized rate of insurance and the Government will pay the difference between the subsidized rate and the full premium rate.

After an area having special flood hazard has been identified, the owner of newly constructed or substantially improved properties located in such an area must pay the full premium rate. The same full premium rate is required of all owners of properties located outside the special flood hazard area. Federal reinsurance against heavy losses is provided to the insurance industry. The program contains provisions to require local governments to adopt and enforce measures to restrict the future development of lands that are exposed to flood hazards. Since the inception of the program, FIA has notified more than 15,000 communities that they are flood prone and that they should apply for this special coverage.

Eligible Beneficiaries : The county or community must initially establish eligibility before flood insurance can be offered in an area. The application must include copies of enacted flood plain management measures consistent with the National Flood Insurance Program regulations. Residents and property owners in applicant community are then eligible.

E0 Data Collected : There currently is no collection of E0 data in this program.

Finding : There are no apparent E0 data requirements in this program.

Recommendations : None. There is no apparent need to collect data for E0 use. There are some opportunities in the minority business area that should be reported on.

2. Urban Property Insurance

Type of Assistance: Insurance.

Justification : Federal reinsurance against excessive losses resulting from riots and civil disorders is available only to property insurance companies that cooperate as risk-bearing members of a State Fair Access to Insurance Requirements (FAIR) Plan. These plans are designed to assure reasonable access to basic property insurance (fire, extended coverage, and vandalism and malicious mischief) to any property owner in urban areas. FAIR plans operate in 26 states, the District of Columbia and Puerto Rico. Available only in States (a) with acceptable FAIR plans and (b) which have provided for appropriate State sharing reinsurance of losses. To be more explicit, the FAIR plan program involves cooperative action by private insurance companies, State governments, and the Federal Government. If insurance companies agree to insure the hard-to-place urban area properties by participating in State-supervised FAIR plans, the Federal Government provides reinsurance against excessive losses resulting from riots and civil disorders on all properties insured by such insurance companies in the State. This Federal reinsurance was sought by the primary insurers after the series of riots between 1965 and 1968, to replace private reinsurance coverage which those insurers claimed was no longer available or prohibitively priced.

FAIR plans vary from State to State, but all of the plans conform to certain basic principles. Every property owner in specified urban areas is guaranteed an inspection of his property. If the property meets reasonable underwriting standards, he is assured insurance against fire and extended coverage perils. If the property is found to be uninsurable, the owner is advised of the deficiencies so that he can correct them and reapply for coverage. The premium charged for insurance in most States is the standard premium for the applicable class of business, subject to the imposition of specific condition charges based on objective defects which increase the hazard. The plans must be approved and administered under the supervision of the State Insurance Authority, and are subject to criteria established by law and by the Secretary of Housing and Urban Development through the Federal Insurance Administration.

Two methods of operation have been adopted by the various FAIR plans. One method involves servicing carriers which issue policies and pay claims on behalf of a pool for a fee based upon a percentage of the premium. The other method is essentially a syndicate operation with underwriting and claims settlement functions performed by the syndicate or pool as a separate insurance entity. Under both methods, full use is made of local agents and brokers in producing the business and informing the public of the availability of coverage, delivering the policy, collecting the premiums, and submitting claims.

Companies licensed in a State participate in the pooled experiences for losses and expenses in proportion to their share of the fire and extended coverage insurance premium writing in the State.

Eligible Beneficiaries : For riot insurance: Property insurance companies participating as risk-bearing members of the FAIR plan in the State in which reinsurance is written. For FAIR plans: Must operate under State insurance authorities and meet Federal Insurance Administration standards. For owners of property in urban areas: Property must be found insurable (upon inspection); premium rate depends upon the physical condition of the property without regard to environmental hazards. For States: FAIR plan commitment to reimburse the Secretary. Applicant property owners must contact State FAIR plan or State Insurance Commissioner.

EO Data Collected : There are currently no EO data requirements in this program area because of the way the FAIR plan is administered.

Findings : That the Equal Opportunity Office should exert its presence during the review of FAIR plans.

That any data currently collected could readily be used by EO by overlaying data on census trends prepared by the Department of Commerce.

Recommendations : None.

3. Federal Crime Insurance Program

Type of Assistance: Insurance.

Justification : Eligible applicants must complete the application form and any amendatory endorsements which may be in use provided by local insurance agents, brokers, or the servicing companies. (Forms HUD-1621 or 1631). In the event of loss, the insured completes

the notice and proof of loss, HUD Form 1640, and mails to the appropriate servicing company through the agent or broker. Issuance of commercial policies against burglar losses is subject to satisfactory inspection of premises to determine compliance with protective devices requirements. May require up to 21 days for inspection but effective date of policy is dated back to noon of the day following date of application.

- Eligible Beneficiaries : Businessmen and residents of homes and apartments in premises located in State designated by the Federal Insurance Administration (FIA) are eligible. The applicant must have protective equipment which meets the FIA standards and pay the specified premium. Protective devices are not currently required for premises insured against loss from robbery only. Commercial and residential premiums reflect degree of crime rate of the area in which premises are located. The Federal program now available (September 1975) in the States of Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Kansas, Massachusetts, Missouri, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Tennessee, and the District of Columbia. A State becomes eligible for the program when the administrator of the Federal Crime Insurance program determines that affordable crime insurance is virtually impossible to get through normal channels, and when no steps have been taken at the State level to remedy the situation. State crime insurance programs similar to the FCIP are available in California, Indiana, Michigan, New Jersey, and Wisconsin.
- EO Data Collected : Both forms are insurance application forms. Data collected is: Policy number; insured's name, telephone and mailing address; location of premises; description of building; determination of whether three or more persons, other than relatives, reside on premises; history of previous insurance under program; amount of insurance applied for; premium computation; effective date; expiration date; and minority group of applicant.
- Forms : HUD 1621 - Federal Crime Insurance Program. Residential Crime Insurance Policy Application.
HUD 1631 - Federal Crime Insurance Program. Commercial Crime Insurance Policy.
- Source : Applicant in conjunction with insurance agent or broker.

Frequency of Collection : As required.

Reliability : Reliability of reports is not currently being determined. There is no way of determining accuracy by an independent means. The credibility is thought to be decreasing as more direct public approaches are being made.

Method of Retrieval : Automated.

Current User : The Federal Insurance Administration has selected a servicing company in each State and sells policies through property insurance agents and brokers. The FIA or the local office of HUD can furnish the name of the current serving company for each State. The servicing companies provide a statistical company with the raw data for the program.

User Reports : Statistical reports prepared by Safety Management Institute are furnished FIA. The reports contain information by ethnic group of coverage written, policies earned premiums, incurred claims, incurred losses, and earned incurred loss ratio. HUD Statistical Yearbook. Primarily a tool used in Crime Insurance Office.

Data Relevant to HUD's EO Objectives Not Currently Collected : None. Present forms capture enough data to meet HUD's objectives.

Finding : Data collected is adequate.

Recommendation : None.

H. Interstate Land Sales Registration

There currently appear to be no EO data requirements. This program area was established to give the public a measure of protection against fraudulent and deceptive land sales operations. The one program in this program area is designed to correct a number of common abuses in land sales by requiring those engaged in interstate sales or leasing of land to register the offering with the U.S. Department of Housing and Urban Development. They must also make a full disclosure to the buyer about the status of property being transferred. The sellers affected are those who offer, through the mail or by other means, fifty or more unimproved lots for sale or lease in interstate commerce.

Land Sales - Undeveloped Plots in Interstate Commerce

- Type of Assistance: Dissemination of technical information; investigation of complaints.
- Justification : Developers who sell subdivisions of undeveloped land of fifty or more lots less than five acres in size through facilities of interstate commerce must register with the Office of Interstate Land Sales Registration and must provide all purchasers with a copy of a Federal Property Report which sets forth salient facts about the development and the developer. Failure to do so in timely fashion subjects the developer to statutory and regulatory penalties. Developers file an extensive statement of record (including a Federal Property Report) disclosing generally all pertinent facts about the land, its ownership, control, amenities, restrictions, nature of purchase or lease transaction, and other required information. Specific requirements set forth in Federal Register, Title 24, Chapter 9, Part 1710.
- Eligible Beneficiaries : Every person buying or leasing one or more undeveloped lots in a subdivision of 50 or more lots less than five acres in size marketed through interstate commerce.
- EO Data Collected : There currently is no collection of equal opportunity data in this program.
- Findings : There currently appear to be no EO data requirements. Congress passed the Interstate Land Sales Full Disclosure Act of 1968 to give the public a measure of protection against fraudulent and deceptive land sales operations.
- Recommendation : None.

I. Policy Development and Research

General Research and Technology Activity

- Type of Assistance: Project grants; research contracts.
- Justification : Funds are provided for research projects consistent with needs of the Department. Research relating to national housing needs, evaluation of existing housing and community development programs, improving the environment, and improving the management and planning of State and local governments are areas eligible for award of contracts or grants. Contracts are available to State and local governments, industry, and nonprofit institutions. Responses to HUD requests for proposals issued by the Division of Contracts is the normal method. Unsolicited proposals that are original in concept and meet program objectives are also considered. The applicant will negotiate with HUD on the contract/grant amount and scope of work of the proposal. The headquarters office monitors grantee performance.
- Eligible Beneficiaries : State and local governments, and public and/or private profit and nonprofit organizations which have authority and capacity to carry out projects.
- EO Data Collected : There are currently no HUD forms used to collect equal opportunity data in this program.
- Data Relevant to HUD's EO Objectives Not Currently Collected : Data collection is required in the following areas:
- a. Collection of minority and female contract data on contracts awarded through competitive bidding. Currently data is available only on 8a contract awards. The data would, of necessity, have to be collected after the determination of the successful bidder was made, so as not to prejudice the HUD selection committee one way or the other.
 - b. Determination of the number of minority and female research persons who are working on HUD research projects through grant programs. The faculty members need not necessarily be from minority or female institutions of higher learning, but can be from any educational institution.
 - c. The goals of HUD research in the area of minority, female, disadvantaged, and aged should be stated annually and a list of the projected research projects to be undertaken should be assembled. At the close of the year, status reports of the projects should also be prepared.

Currently, many of the research activities are directed at a major group, such as low income, which is primarily minority. Therefore, a major program activity, such as Direct Cash Assistance, could be classified as a minority-oriented program, even though it is testing for potential implementation as a programmatic alternative for housing assistance to low-income families. Priority in this type of research would be to impact evaluations of HUD programs to determine the effect of HUD programs on achieving fair housing under Title VIII.

Policy:

The requirement that this office has in the policy development area of HUD should also be outlined, although it does not fall under the funded program by definition. There are data needs similar in nature to the scope of this contract that cross program area lines that must be obtained in order to fulfill the awesome responsibilities to ensure that HUD's policies are in concert with the requirements of Title VIII and Title VI and that HUD is providing fair housing in all program areas.

Findings : For long range policy planning, HUD must have a profile of the population benefiting from the program decisions. By collecting data on eligible beneficiaries, in addition to statistics on actual participants, comparisons could be made that would indicate whether a reasonable number of eligibles from all segments of the population are being reached and served. Eligibility data is also an important tool in its own right for assisting program managers during pre-grant decision making to plan and target their activities effectively, and to subsequently assist in their outreach effort. There currently exists in HUD an urgent need for more guidance as to how ethnic data can be effectively tabulated and used for management and evaluation purposes.

Recommendations : Minority and female data should be collected on contracts awarded through competitive bidding.

Data should be collected on the number of minority and female research workers who are working on HUD projects through grant programs.

A clearly defined budget line item stating the goals of HUD research in the area of minority, female, disadvantaged, and aged should be included in the annual budget.

General policy guidance should be furnished the Department on how the collected data, and the analysis based on the statistics, can assist such management tasks as locating targets of assistance, guiding outreach efforts, and evaluating the effectiveness of delivery.

Policy should be issued to establish a basic standard for ethnic data collection. This policy should require the submission of data on eligibles, applicants, and negative program efforts, in addition to beneficiary statistics.

APPENDIX II

Data Interface Summary

by

Program Area

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Low Rent Public Housing</p> <p>HUD-52209 HUD-51235</p>	<p><u>Initial Occupancy</u></p> <p>Total occupied dwelling units by minority category and by</p> <ul style="list-style-type: none"> - elderly (age, disability, or handicap) - displacement status <p>Total dwelling units vacated, by minority category</p> <p>- - -</p> <p><u>Occupancy (EIOP)</u></p> <p>Total by minority category of</p> <ul style="list-style-type: none"> - units under lease at end of previous reporting period - units vacated during current period <ul style="list-style-type: none"> o all families o families who have purchased houses 	<p>Low Rent Housing Occupancy System (Statistical Tables)</p> <p>Low Rent Housing Occupancy System (Statistical Tables)</p>	<p><u>Initial Occupancy</u></p> <p>Total applications received and total rejected, during reporting period (generally the previous month) by minority category and by</p> <ul style="list-style-type: none"> - elderly - displacement status - sex of family head <p><u>Occupancy</u></p> <p>Total by minority category of applications received from new families. This information should be presented for comparison with total units actually filled during current reporting period.</p>	<p>Applicant data can be obtained from the LHA's in the region.</p> <p>Applicant data can be obtained from the LHA's in the region.</p>

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Low Rent Public Housing (Cont'd)</p> <p>HUD-51227 HUD-51245</p>	<ul style="list-style-type: none"> - units filled by new families during current period <p>Total by minority category of units currently under lease by</p> <ul style="list-style-type: none"> - elderly families (age, disability, or handicap) - displaced families <p>Total by minority category of over-income tenants</p> <ul style="list-style-type: none"> - required to move - not required to move <p>Characteristics of families moving into LRPB and reexamined for continued occupancy by minority category and</p> <ul style="list-style-type: none"> - sex and age of head - both husband and 	<p>SHACO</p>	<p>A new form - <u>Annual Recap or Characteristics of Families Who Have Applied But Have Not Been Admitted to LRPB</u> - is under review and awaiting OMB approval.</p> <p>This form will capture information on total applications received during the</p>	<p>SHACO</p> <p>Total applicant data can possibly be obtained from the LHA's in the region. These data can be run against the data obtained on the HUD Forms 52209 and 51235.</p>

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<p>wife present</p> <ul style="list-style-type: none"> - total in family - total minors - minors by age - number of workers - number of elderly - total family income - income to determine eligibility - income to determine payable - monthly rent (contract) - monthly rent (gross) - Brooke Amendment rent - number of bedrooms <p>Organized relief or benefit:</p> <ul style="list-style-type: none"> - OAA - AFDC - AB - APTD - Other Government relief - OASDI (Social Security) - Other Government 	<p>Same as above</p>	<p>year, but not housed, by</p> <ul style="list-style-type: none"> - minority category - total family income - total persons in family - total minors <p>It will provide data on total families by minority category</p> <ul style="list-style-type: none"> - receiving SSI - receiving AFDC - receiving other relief - on welfare - who are elderly - with female head <p>It will supply a breakdown of total applications "not housed" by</p> <ul style="list-style-type: none"> - placed on waiting list - rejected <p>and will show the total number of applications "housed."</p> <p>This form should meet the needs for data not currently collected. It is suggested</p>	

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<p>benefits</p> <ul style="list-style-type: none"> - Private organization benefits - Family of service man <p>Family status:</p> <ul style="list-style-type: none"> - elderly - disabled - handicapped - not elderly <p>-----</p> <p>Only on HUD 51227</p> <p>-----</p> <p>Previous housing:</p> <ul style="list-style-type: none"> - Substandard - Without or about to be without housing - Standard or not known <p>Displacement status:</p> <ul style="list-style-type: none"> - UR - Subsidized housing - Other public action - Natural disaster - Not displaced or 		<p>however, that the frequency of collection be made half-yearly instead of annually to coincide with the submission of HUD-51245.</p>	

HOUSING MANAGEMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<p>not known</p> <p>Previous monthly rent ----- Only on HUD 51245 -----</p> <p>Admission data:</p> <ul style="list-style-type: none"> - year - total family income <p>Within income limits</p>	<p>Same as above</p>		
<p>Section 236 (Interest Reduction Payments-Rental Cooperative Housing for Lower Income Families)</p> <p>HUD-3131 HUD-3132</p>	<p>For each family applying or being recertified, information is captured on:</p> <ul style="list-style-type: none"> - minority category - years employed - age of head - sex of head - number in household - number of eligible minors - number of other minors 	<p>SHACO (Tenant Family Characteristics and Income by Age, Sex, Minority Group); HUD Yearbook Tables</p>	<p>None. Present forms capture enough data to meet HUD's objectives.</p>	

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<ul style="list-style-type: none"> - number of dependents - number of handicapped - occupation of head Income (last 12 mos.) <ul style="list-style-type: none"> - Wages - Social Security - Other retirement - Disability - Unemployment - Welfare -Area income limits for family -Market rental at full interest -Estimated assistance payment Special considerations: <ul style="list-style-type: none"> - Handicapped - Elderly (over 62) - Displaced by Government action - Displaced by disaster - Former occupant - Substandard housing 			

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<ul style="list-style-type: none"> - Military on active duty <p>Eligibility for Rent Supplement:</p> <ul style="list-style-type: none"> - Area income ceiling - Income for supplement payment - Average monthly income - Unit rent - Applicant's share - Amount of rent supplement 			
<p>Section 232 (HUD-Insured Nursing Homes) HUD-9802</p>	<p>Total number of beds, by minority category,</p> <ul style="list-style-type: none"> - Occupied end of previous year - Vacated during year - Filled during year - Occupied end of this year <p>-Total beds available in project</p> <p>-Number of male current patients</p>	<p>Report Generated ("Section 232 - Nursing Home Occupancy")</p>	<p>Total number of applications, by minority category and expected source of payment, received during the year.</p>	<p>Applicant data can be obtained from Nursing Home Project Director-Add on to Existing Form and Data Bank</p> <p>-Can be requested to be kept by race, sex.</p>

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	-Number of female current patients Number of patients by payment source - Private funds - Insurance - Medicare - Medicaid - VA - Other			
Minority Contractor Goals Program HUD-9737	Total number and value of home property repair contracts of \$2000 or less, by minority category. Total number and value of home property repair contracts above \$2000, by minority category. Total number and value of home property repair subcontracts, by minority category.	Minority Contractor or Goals Program Report. No planned system.	If there are a significant number of women entrepreneurs among small business construction contractors and area managers it would be justifiable to add a sixth category -- "Women" -- to the five minority categories for which data are collected.	Add "Female" column to report form. Additional data cells can be derived from presence of "Women" category.

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<p>Total number and value of multifamily property repair contracts of \$2000 or less, by minority category.</p> <p>Total number and value of multifamily property contracts over \$2000, by minority category.</p> <p>Total number and value of multifamily property repair sub-contracts, by minority category.</p> <p>All other contracts of \$2500 or less, by minority category.</p> <p>All other contracts over \$2500, by minority category.</p> <p>Total number and value of Area Management contracts in effect at end of report period, by minority category.</p>			

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
Resident Employment for LHA's with 500 Units or More in Management HUD-53150	None	System interface would be the same. Data is currently manually prepared. Report name is same as form name.	Data required, by minority category, of the number of residents employed in each of the job categories listed (e.g., administration, tenant services, utilities, protective services, routine maintenance, etc.).	The report should be modified to include race and sex categories. Because of the method of reporting, the data should be available to LHA, and should not represent a filing hardship.
Homeownership Counseling HUD-9902	None	System interface would be same as currently. Data is manually prepared. (Current Report Name--"Homeownership Counseling")	Data required for the reporting periods of activity, by minority category, on - Number of potential and existing mortgagors in the counseling agency's workload. - Number of potential mortgagors who purchased homes. - Number of existing delinquent mortgagors brought current with their payments. - Number of existing defaulting mortgagors for whom relief was	The report form should be modified to include race and sex categories. Since the data collected is based on personal observation and contact, there should be no hardship placed on the initiator.

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
			<p>obtained (reinstatement, forbearance, assignment to HUD deeds in lieu).</p> <ul style="list-style-type: none"> - Number of existing defaulting mortgagors for whom no relief was obtained. 	
<p>Multifamily HUD-Insured & Section 202 Housing HUD-9801</p>	<p>Occupancy data, by minority category, showing:</p> <ul style="list-style-type: none"> - units occupied end of previous year - units vacated during year - units occupied end of reporting period - units occupied by elderly families of <ul style="list-style-type: none"> • 1 person • 2 persons • 3 persons 	<p>Multifamily Housing Occupancy System</p> <p>(Report produces Occupancy Characteristics Tables, and Special Occupancy Characteristics Reports as requested).</p>	<p>Data required on sex of household head for all categories of occupancy listed in Col. 3.</p> <p>Data required, by minority category and sex of household head, on applications received and rejected during the year. These data should be presented for comparison with number of units filled.</p>	<p>Report should be revised to include sex of household head.</p>

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HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<ul style="list-style-type: none"> - units occupied by subsidized families benefiting from <ul style="list-style-type: none"> ● RS only ● RS and 236 payments ● 236 payments only ● Section 23(c) leased housing payment only. 			
Section 8 Housing Assistance Payments for Lower Income Families HUD-52659 HUD-52675	<u>Application for Tenant Eligibility</u> (HUD-52659) Data on applicants, by minority category, showing: <ul style="list-style-type: none"> - present housing status - present housing cost - displacement status - family status (elderly, disabled, handicapped) 	This data should interface with the "Tenant Applicant Profile" System (under development)	None. Present forms capture enough data to meet HUD's objectives.	Because of the stage of this system, the EEO office should be able to obtain any data desired from this form (system). If the system is interactive, many crosstabs of data should be available, because basic data contains elements for each beneficiary group.

HOUSING MANAGEMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<ul style="list-style-type: none"> - size of family - number of minors - number of bedrooms - sex of head - age of head - number of earners - source of income (wages, welfare, benefits) - annual income - total assets - eligibility income - lower income limit - very low income limit - allowances (medical and unusual expenses) - HAP (gross rent, gross family contribution). <p><u>Report on Family Characteristics</u> (HUD-52675)</p> <p>Additional data captured on this form are:</p> <ul style="list-style-type: none"> - allowance for 			

HOUSING MANAGEMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	utilities and other services - fair market rent - contract rent - shopping incentive			
Tracking Home Mortgage Defaults FHA-2068	None	System interface will be "Single Family Default Monitoring"	Minority group category of defaulting mortgagor. <u>NOTE:</u> As it is presently constructed, FHA-2068 does not provide any indication of the racial breakdown of defaulting mortgagors in the four categories on the form, i.e., - Mortgage reinstated - Foreclosure imminent - Foreclosure started - Foreclosure completed. Thus, the Single Family Housing Division, Office of Loan Management, has no way of determining the percentage of minority homeowners affected.	Forms 2068 and 20685 could be revised to include data on affected groups of beneficiaries. Because of the sensitive nature of the data, there may be resistance to filing race/sex data.

HOUSING MANAGEMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Disaster Program - Temporary Housing HUD-9987 (Phase 1)</p> <p>(Unnumbered form) (Phase 2)</p>	<p>Applications:</p> <ul style="list-style-type: none"> ● total received ● in process ● cancelled ● eligible ● ineligible <p>Occupancy:</p> <ul style="list-style-type: none"> ● total families assisted <p>Transient accommodations</p> <p>Minimal repair program</p> <p>Site development</p> <ul style="list-style-type: none"> ● private sites ● commercial sites ● group sites <p>Staging area operations</p> <ul style="list-style-type: none"> ● mobile homes/trailers ● furniture ● living kits <p>Cumulative occupancy Vacates (this period) Vacates (cumulative)</p>	<p>Current reporting is manual.</p>	<p>None. Adequate data are captured and available.</p>	<p>There are no current plans to automate the data gathered. The EEO office should be able to obtain any data required from this form.</p>

HOUSING MANAGEMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<p>Current occupancy</p> <ul style="list-style-type: none"> ● total assisted <p>Housing plans of remaining occupants</p> <ul style="list-style-type: none"> ● total current occupancy <p>Type of alternate housing for occupants vacated</p> <ul style="list-style-type: none"> ● total vacated <p>Status of mobile homes/trailers</p> <ul style="list-style-type: none"> ● total received <p>Occupied mobile homes/trailers</p> <ul style="list-style-type: none"> ● total currently occupied <p>Furniture</p> <ul style="list-style-type: none"> ● total occupants assisted 			

HOUSING PRODUCTION AND MORTGAGE CREDIT

HOUSING PRODUCTION AND MORTGAGE CREDIT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Section 235 Homeownership Assistance for Lower Income Families FHA-3100-3 FHA-93101A Title I Property Improvement and Mobile Home Loans FH-4</p>	<p>The two forms provide for the capture of extensive minority and female data on applicants. But no EO data requirements are currently satisfied because of a suspension of data collection activity.</p> <p>Minority category data on loan applicants, including:</p> <ul style="list-style-type: none"> o type of property o location of property o type of improvement o date of note o frequency of payment o number of payments to liquidate loan o net proceeds to borrower of purchase price o amount of periodic payment o date of first payment 	<p>The HARAS (Homeownership Assistance and Recertification Application System) listed as an on-going system in the Long Range Plan for Data Automation and fed by data from these forms was described as operative but undergoing extensive modifications.</p> <p>The Title I System (Minority Reports)</p>	<p>There is no data collection or retrieval activity being pursued on this program. The information available on the forms would be adequate, however, if it were captured and used.</p> <p>Sex of loan applicants.</p>	<p>This system is currently listed as being operational but is undergoing extensive modification involving six or more man-months of effort. Sex of loan applicants can be obtained by modifying the data collection form and having the lending institution present the additional data.</p>

HOUSING PRODUCTION AND MORTGAGE CREDIT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
FHA-341	Minority category and female-head data, including: <ul style="list-style-type: none"> o total number in household o total family income o occupation of head o major source of income o previous residence type o location of home-site o acquisition cost of mobile home o amount of down-payment o amount financed o duration of loan o monthly payment o type of structure o number of rooms, bedrooms & baths 	Title I Statistical System (Mobile Home Characteristics Reports)	None	None
Home Insurance Programs	Minority group applicant data by: <ul style="list-style-type: none"> o age and sex (mortgagor) 	Appraisal and Statistical Collection (Minority Informa-	The two forms (FHA-2900 and FHA-700-30) combine to provide adequate applicant data relevant to HUD's EO objectives.	System is operational but is undergoing extensive modification involving six or more man-months of effort.

HOUSING PRODUCTION AND MORTGAGE CREDIT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
FHA-700-30	<ul style="list-style-type: none"> o age and sex (co-mortgagor) o total dependents o purpose of loan o mortgage type o total assets o total liabilities o total joint income o total acquisition cost o total mortgage payment o total housing expenses o total fixed payments o previous monthly housing expenses o previous monthly fixed payments <p>Minority group applicant data by:</p> <ul style="list-style-type: none"> o case number o location <ul style="list-style-type: none"> - SMSA - census tract o neighborhood <ul style="list-style-type: none"> - urban renewal - code enforcement 	This form is an optical character reader and interfaces with the Appraisal and Statistical Collection System.		None.

HOUSING PRODUCTION AND MORTGAGE CREDIT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Public Housing Turnkey and Conventional Production (No form)</p>	<ul style="list-style-type: none"> - blighted - model city - core city o transaction <ul style="list-style-type: none"> - mortgage rejected - insurance endorsement o displacement data <ul style="list-style-type: none"> - under 62, not handicapped - under 62, handicapped - over 62, not handicapped - over 62, handicapped <p>None</p>	<p>None</p>	<p>HPMC provides direct loans for the construction of public housing projects, but collects no data on the participation of minority businesses in the contracting opportunities that arise.</p> <p>Suggested EO data relevant to HUD's objectives would include:</p> <ul style="list-style-type: none"> o total number of 	<p>This recommendation will require the establishment of a data collection instrument and should interface with the Appraisal Statistical Collection System.</p>

HOUSING PRODUCTION AND MORTGAGE CREDIT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Data collection responsibility has been transferred from HPMC to HM, but HM has not yet assumed this function.</p>			<ul style="list-style-type: none"> contracts or subcontracts awarded to minority businesses by minority category o total value of contracts or subcontracts awarded to minority businesses, by minority category o types of contracts or subcontracts awarded to minority businesses, by minority category. 	

COMMUNITY PLANNING AND DEVELOPMENT

COMMUNITY PLANNING AND DEVELOPMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
Relocation Assistance & Real Property Acquisition Activities HUD-7083	<p>Total number of relocated minority category</p> <ul style="list-style-type: none"> o families o individuals o businesses and nonprofit organizations <p>Relocation payments and expenses to minorities</p> <ul style="list-style-type: none"> o for moving families and individuals o for moving businesses and nonprofit organizations o replacement housing payments for homeowners o rental assistance o downpayments 	<p>For this program HUD-7083 does not purport to be part of a compliance monitoring system, according to information provided by the Relocation and Development Service Division, CPD.</p> <p>(Annual Relocation and Acquisition Activities Report)</p>	<p>Number of relocated female individuals, female household heads, and female-owned businesses.</p>	<p>Report of Relocation Activities (HUD Form 6090.1) could be modified to provide additional information. The LPA could provide the source input.</p>
Section 115 Housing Rehabilitation Grants HUD-6260	<p>Minority category applicant data, including:</p> <ul style="list-style-type: none"> o total dependents o total monthly income 	<p>Rehabilitation Loans and Grants. Report on Sec 312 (Rehabilitation Loans and Sec 115 Rehabilitation</p>	<p>1. Sex of applicant owner-occupants. 2. Data on applications reviewed and rejected. Section J (Approval of</p>	<p>The recommended addition to data collection under these programs can be made by form modification. The data would continue to be gathered from the public body</p>

COMMUNITY PLANNING AND DEVELOPMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Section 312 Housing Rehabilitation Loans HUD-6230</p>	<ul style="list-style-type: none"> o net assets o total monthly housing expenses o age of property o remaining life of property o number of dwelling units <ul style="list-style-type: none"> - before rehabilitation - after rehabilitation o total rehabilitation costs <p>Minority category applicant data, including</p> <ul style="list-style-type: none"> o total dependents o number of dwelling units <ul style="list-style-type: none"> - before rehabilitation - after rehabilitation o total refinancing amount o total funds from other sources o total loan applied for 	<p>Grant Programs - Tables I & II).</p> <p>Rehabilitation Loans & Grants. (Report on Sec. 312 - Rehabilitation Loans & Sec. 115 Rehabilitation Grants Program-Tables I & II)</p>	<p>Application) of the form should be modified to provide for a statement on rejected applications.</p> <ol style="list-style-type: none"> 1. Sex of applicant owners. 2. Data on applications reviewed and rejected. Section O (Recommendation on Application) of HUD-6230 and Section N (Recommendation on Application) of HUD-6243 should be modified to provide for a statement of rejection. 	<p>applicant.</p> <p>The LPA can provide the required information on rejected applicants. A slight form modification will provide the applicant's sex and of course, this data will be provided by the public body applicant.</p>

COMMUNITY PLANNING AND DEVELOPMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
HUD-6243	<ul style="list-style-type: none"> o number of months o total monthly income o total monthly housing expense o total assets o total liabilities o unpaid debt on property o age of property o remaining life of property o "as is" value o cost of property improvement <p>Minority category applicant data, including:</p> <ul style="list-style-type: none"> o number of dwelling units <ul style="list-style-type: none"> - before rehabilitation - after rehabilitation o total rehabilitation cost o total loan amount o number of months o existing debt on property 			

COMMUNITY PLANNING AND DEVELOPMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Section 701 Work Study Projects HUD-6785.4</p>	<ul style="list-style-type: none"> o total income from dwelling units o total operating expenses o total taxes o total fixed charges o age of property o remaining life of property o "as is" value o cost of property improvements <p>Data on students receiving work study grants are captured by race and sex.</p>	<p>System is manual. (National Summary Report on Work Study Reports)</p>	<p>None.</p>	<p>Not applicable. From FY76 regional offices themselves will collect the data and administer the program.</p>
<p>Community Development Block Grants (HAP) HUD-7015.9</p>	<p>Housing needs of current, additional, and displaced (or expected to be displaced) minority households by:</p> <ul style="list-style-type: none"> o family size o elderly/handicapped o nonelderly/handicapped 	<p>Community Development Block Grant (CDBG) Entitlement Determination</p> <p>System is planned to be redesigned.</p>	<p>Data on households with female heads in three categories of "housing needs": current residents, additional households expected, and displaced or expected to be displaced families.</p>	<p>The additional data requirement can be made by adding a single column to HUD-7013.9. This can be accomplished by the applicant. This system is being considered for future development to replace the existing system. The new system will provide interface with automated census files, HUD, Master Locality</p>

COMMUNITY PLANNING AND DEVELOPMENT

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
				File, and will include other automated advancements.

NEW COMMUNITIES ADMINISTRATION

NEW COMMUNITIES ADMINISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Title VII Loan Guarantees</p> <p>Statistical Progress Report (Schedule L: Minority Participation (Schedule M: Population)</p> <p>(Schedule D: Developer's Staff Report)</p>	<p>Name of minority firm</p> <p>Nature of contract</p> <p>Dollar amount of contract</p> <p>Ethnic category</p> <p>Racial composition</p> <ul style="list-style-type: none"> o percent in SMSA o actual first move-ins this year o project to date o percent of current project population <p>None</p>	<p>New system being installed.</p> <p>(Statistical Progress Report)</p> <p>(Statistical Progress Reports)</p> <p>(Statistical Progress Reports)</p>	<p>None</p> <p>None</p> <p>Number of minority and women employees in</p> <ul style="list-style-type: none"> o professional category o clerical category o other categories <p>Number of minority and women employees in the following reported categories (end of previous year and total current)</p> <ul style="list-style-type: none"> o construction 	<p>The data required can be collected by modifying the form to include the missing data. The information can be obtained from the new community developer. There are not currently plans for automation in the immediate future.</p>

NEW COMMUNITIES ADMINISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
			<ul style="list-style-type: none"> o manufacturing o wholesale and retail o finance, insurance, real estate o education o government (police, fire, etc.) o transport, communication, utilities o health o natural resources (forestry, etc.) o other professional o other services 	

FEDERAL DISASTER ASSISTANCE

FEDERAL DISASTER ASSISTANCE

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>Disaster Assistance: There are no relevant EO data collection forms.</p>	<p>There are no EO data requirements in this program because the applicant is the State or local government submitting a project application or request for direct Federal assistance under the Disaster Relief Act of 1974.</p>	<p>None.</p>	<p>None. Federal agencies and disaster relief organizations provide assistance based on agency function. The primary responsibility for managing the projects rests with the local officials responsible for disaster assistance. Housing Management in HUD has the major responsibility and discusses disaster preparedness in this Task.</p>	<p>None.</p>
<p>State Disaster Preparedness Grants: None.</p>	<p>This program requires clearinghouse review. Therefore, public agencies charged with enforcing or furthering the objectives of State and local civil rights laws have the opportunity to review and comment on the civil rights aspects of the project for which the assistance is sought.</p>	<p>None.</p>	<p>None.</p>	<p>Not applicable.</p>

FEDERAL INSURANCE ADMINISTRATION

FEDERAL INSURANCE ADMINISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
Federal Crime Insurance Program HUD-1621 HUD-1631	A property owner or tenant or businessman within an eligible State or the District of Columbia provides the following information on the application form: For each proper owner or tenant: - Social security number - Insured's name - Insured's mailing address and telephone number - Location of premises - Description of building - Number of household - Minority category - Previously insured under program - Amount of coverage - Effective date - Expiration date - Name and address of servicing company	This is an automated system, but is maintained and operated by a servicing company in each State selected through competitive bidding. The FIA or the local office of HUD can furnish the names of the current servicing company for each State. The servicing companies provide a statistical company with the raw data for the program. Statistical reports are prepared by Safety Management Institute and are furnished to FIA.	None. Present forms capture enough data to meet HUD's objectives.	Not applicable.

FEDERAL INSURANCE ADMINISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
	<ul style="list-style-type: none"> - Producer's name, address and telephone number For each businessman: - IRS employer identification number - Insured's name - Insured's mailing address and telephone number - Location of premises - Description of building - Class and type of business - Check cashing policy - Statement of previous insurance under program - Premium computation - Racial or ethnic background of applicant - Effective date - Name of servicing company and address - Producer's name, address and telephone number 			

FEDERAL INSURANCE ADMINISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
National Flood Insurance Program. There are no forms used in the program to collect minority data.	There are no apparent EO data requirements in this program. This program was established by Congress in the National Flood Insurance Act of 1968 and expanded in the Flood Disaster Protection Act of 1973, and is designed to provide flood insurance at rates made affordable through a Federal subsidy. In return, communities must adopt and administer local measures that protect lives and new construction from future flooding.	Flood insurance eligibility.	None. There is no apparent need to collect data for EO use. There are some opportunities in the minority business area that should be reported on but this will be covered in the EO minority business section.	This system is under development to replace the existing system because of a major change in user requirements.
Urban Property Insurance and FAIR Plans. There are no forms used in this program to collect minority data.	There are currently no EO data requirements in this program area because of the way the FAIR Plan is administered.	Not applicable.	None. There is no apparent need to collect data for EO use. The FAIR Plan (Fair Access to Insurance Requirements), operated by the insurance industry, reinsured by HUD, and regulated by the insurance department of the State	Not applicable.

FEDERAL INSURANCE ADMINISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
			<p>government, makes firm, extended coverage, and vandalism and malicious mischief insurance available for eligible urban properties. The main thrust of EO in this area appears to be in minority opportunities during compliance activities. Only property insurance companies that participate in FAIR plans are mandated by State law, although a few exist under a director of the State insurance authority or as voluntary assessment. Certain Federal requirements and standards must be met by a FAIR Plan in order to qualify its members. EO should exert its presence during review of plans.</p>	

INTERSTATE LAND SALES REGISTRATION

INTERSTATE LAND SALES REGISTRATION

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
Land Sales - undeveloped plots in Interstate Commerce	There currently appear to be no EO data requirements. Congress passed the Interstate Land Sales Full Disclosure Act of 1968 (Title XIV of the Housing and Urban Development Act of 1968, as amended) to give the public a measure of protection against fraudulent and deceptive land sales operations.	Interstate Land Sales Registration automated system.	None. This program is designed to correct a number of common abuses in land sales by requiring those engaged in interstate sale or leasing of land to register the offering with U.S. Department of Housing and Urban Development. They must also make a full disclosure to the buyer about the status of the property being transferred. The sellers affected are those who offer through the mail, or by other means, 50 or more unimproved lots for sale or lease in interstate commerce.	Interstate land sales registration. This system is being considered for future development to replace the existing system. This system provides information as to the progress, status, and accuracy of the developers disclosure statements in the administration of the Interstate Land Sales Full Disclosure Act. The system also provides the basis for statistical records.

POLICY DEVELOPMENT AND RESEARCH

POLICY DEVELOPMENT AND RESEARCH

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
<p>General Research and Technology Activity. There are no relevant data collection forms.</p>	<p>None.</p>	<p>PD and R Contract Monitoring Automated System Interfaces.</p>	<p>The major HUD EO objective not being monitored through data collection under this program is in providing training, employment and business opportunities in this program.</p> <p>This report in no way states that the opportunities are, or are not, being provided, but only that data is not being formally collected to show that minorities are benefiting. Data collection is required in the following areas:</p> <p>a. Collection of minority and female contract data on contracts awarded through competitive bidding. Currently, data is available only on 8a contract awards. The data would, of necessity, have to be collected after the determination of the successful bidder was made so as not to prejudice the HUD selection committee one way or the other.</p>	<p>Not applicable.</p>

POLICY DEVELOPMENT AND RESEARCH

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
			<p>b. Determination of the number of minority and female research persons who are working on HUD research projects through the grant program. The faculty members need not necessarily be from minority or female institutions of higher learning, but can be from any educational institution.</p> <p>c. The goals of HUD research in the area of minority, female, disadvantaged, and aged should be stated annually and a list of the projected research projects to be undertaken be assembled. At the close of the year, status reports of the projects should also be prepared. Currently, many of the research activities are directed at a major grouping, such as low-income, but this group is primarily minorities so, therefore, a major program activity such as Direct Cash Assistance could be classified as a</p>	

POLICY DEVELOPMENT AND RESEARCH

HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
			<p>minority and disadvantage-oriented program even though it is testing for potential implementation as a programmatic alternative for housing assistance to low-income families. Priority in this type of research would be to impact evaluations of HUD programs to determine the effect of HUD programs on achieving fair housing under Title VIII.</p> <p>Policy:</p> <p>The requirement that this office has in the policy development area of HUD should also be outlined, although it does not fall under the funded program by definition. There are data needs similar in nature to the scope of this contract that cross program area lines that must be obtained in order to fulfill the awesome responsibilities to ensure that HUD's policies are in</p>	

POLICY DEVELOPMENT AND RESEARCH

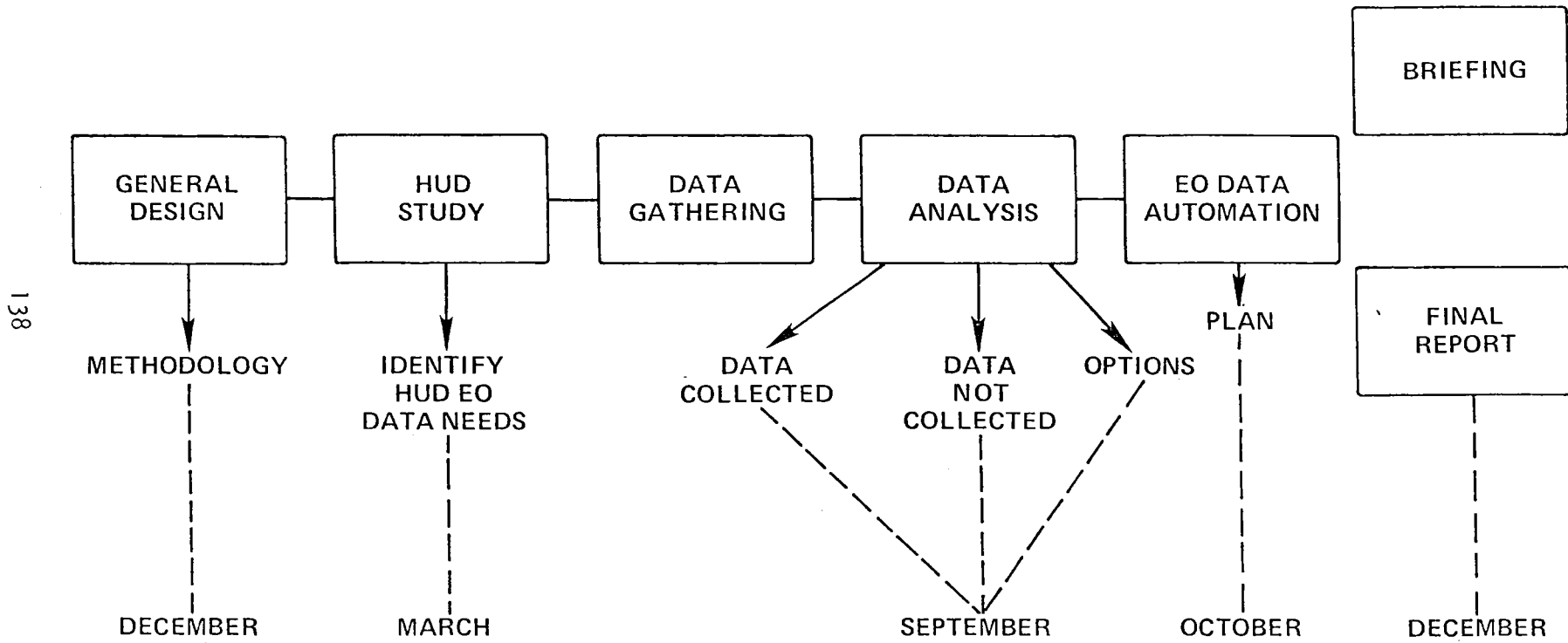
HUD Program & Relevant Data Collection Forms	EO Data Requirements Currently Satisfied	Current System Interface (User Report Name)	EO Data Relevant to HUD's Objective Not Currently Collected	Potential Interface Between Program Area Data Bases and the Essential Elements of Data
			<p>concert with the requirements of Title VIII and Title VI, and that HUD is providing fair housing in all program areas.</p>	

APPENDIX III

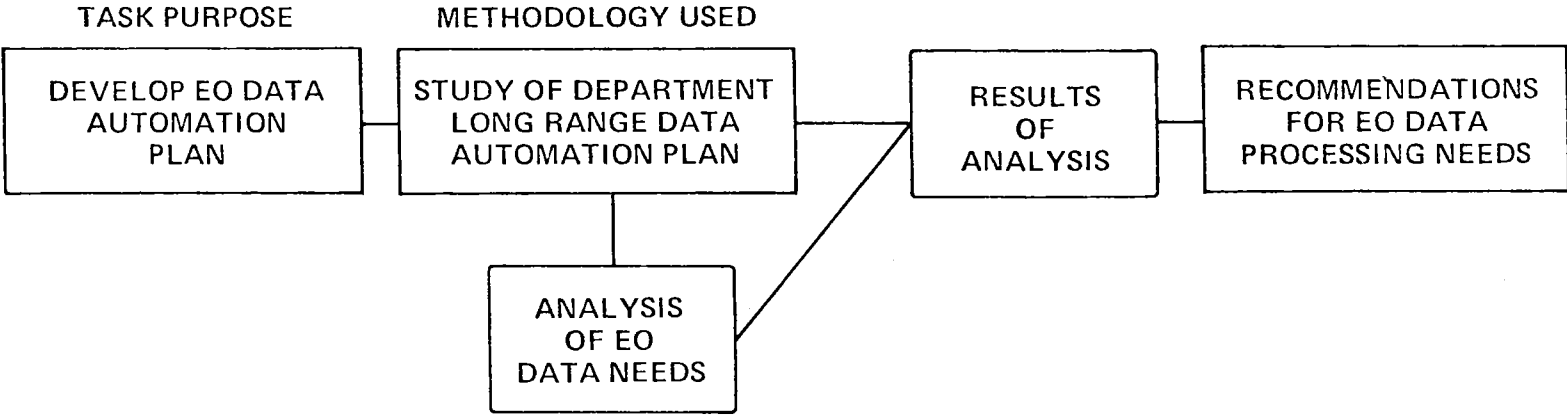
Copies of Slides Used for Presentation

The following slides were used by Evaluation Technologies, Incorporated in an oral presentation to a selected HUD staff gathering in November 1975. Some of the slides will differ with the written report because many of the recommendations of the staff were accepted and have been incorporated into the report.

METHODOLOGY HUD DATA NEEDS STUDY



LONG RANGE DATA AUTOMATION PLAN



RECOMMENDATIONS

- DATA SHOULD BE ESTIMATED OR COLLECTED FOR EACH MAJOR PROGRAM ON THE NUMBER AND RACE/ETHNICITY OF ELIGIBLES THE PROGRAM IS INTENDED TO SERVE.
- HUD SHOULD PUBLISH DEFINITIVE GUIDELINES ON EO DATA USE IN PROGRAM OPERATIONS.
- HUD SHOULD ESTABLISH A POSITIVE DATA COLLECTION SYSTEM IN THE MINORITY BUSINESS PARTICIPATION AREA.
- THIS STUDY SHOULD BE EXPANDED TO IDENTIFY MANAGEMENT DATA NEEDS BY A SAMPLING OF THE REGIONAL OFFICES.
- HUD SHOULD EXPAND THIS STUDY TO DETERMINE IF IT IS FEASIBLE TO PROVIDE VISUAL DISPLAYS OF HUD STATISTICAL DATA FOR EVALUATION BY PROGRAM MANAGERS.

FINDINGS

- LACK OF INFORMATION ILLUSTRATING PROGRAM IMPACT.
- LITTLE DATA ON ESTIMATED ELIGIBLES.
- NEED TO COLLECT APPLICANT DATA.
- NEED FOR POLICY ON COLLECTION OF DATA.
- NO AWARENESS OF USE OF DATA AS A MANAGEMENT TOOL.
- PROGRAM AREAS DO NOT COLLECT AND REPORT RELIABLE DATA ON MINORITY BUSINESS PARTICIPATION.

OBSERVATIONS

- HUD PROGRAMS – LARGE SEGMENT IS MINORITY.
- HUD OFFICIALS PROGRAM ORIENTED.
- PROGRAM MANAGERS LACK DATA FOR ASSESSING IMPACT.
- DATA IDEAL FOR VISUAL DISPLAY.

HOUSING MANAGEMENT

1. LOW RENT PUBLIC HOUSING
2. SEC. 236
3. RENT SUPPLEMENT
4. SEC. 232 (NURSING HOMES)
5. MINORITY CONTRACTORS
6. RESIDENT EMPLOYMENT (LHAS)
7. HOMEOWNERSHIP COUNSELING
8. MF HUD-INSURED & SEC. 202
9. SEC. 8 (HAP)
10. HOME MORTGAGE DEFAULTS
11. DISASTER PROGRAM [TEMPORARY HOUSING]

HOUSING MANAGEMENT

1. SEC. 232 (APPLICATIONS)
2. MINORITY CONTRACTORS (WOMEN)
3. RESIDENT EMPLOYMENT (MINORITY CATEGORY)
4. HOMEOWNERSHIP COUNSELING (MINORITY CATEGORY)
5. MF & SEC. 202 (APPLICATIONS)
6. HOME MORTGAGE DEFAULTS (MINORITY CATEGORY)
7. SEC. 237 (SPECIAL CREDIT RISKS)

HPMC

1. TITLE I – HOME IMPROVEMENT AND MOBILE HOME LOANS
2. HOME INSURANCE PROGRAMS
[203(b) – 221(d) (2) – 235(i)]

HPMC

1. SEC 235 (APPLICANT DATA)
2. PUBLIC HOUSING
(MINORITY CONTRACTOR OPPORTUNITIES)

CPD

- 1. RELOCATION ASSISTANCE
 - 2. SEC. 115 GRANTS
 - 3. SEC. 312 LOANS
 - 4. SEC. 701 WORK STUDY PROJECTS
 - 5. BLOCK GRANTS (HOUSING ASSISTANCE PLANS)
- } REHABILITATION

CPD

1. RELOCATION ASSISTANCE (FEMALES)
2. SEC. 115 AND SEC. 312 (REJECTIONS – FEMALES)
3. BLOCK GRANTS (FEMALE HEADED HOUSEHOLDS)

NEW COMMUNITIES

TITLE VII LOAN GUARANTEES

- MINORITY PARTICIPATION (CONTRACTORS)**
- POPULATION (HOMEOWNERS & TENANTS)**
- DEVELOPER'S STAFF**
- ON-SITE EMPLOYMENT**

FAIR HOUSING AND EQUAL OPPORTUNITY

- **PROGRAMS**

- EQUAL OPPORTUNITY IN HOUSING**

- EQUAL EMPLOYMENT OPPORTUNITY BY FEDERAL CONTRACTOR**

FAIR HOUSING AND EQUAL OPPORTUNITY

- **EO DATA COLLECTION**
 - LARGE AMOUNT COLLECTED
 - NO DATA SHOULD BE DISCONTINUED

- **REQUIREMENTS**
 - EVALUATE HUD PROGRAMS
 - DETERMINE VOLUME OF COMPLAINTS BY PROGRAM
 - REPORTING SYSTEM THAT WILL SELECT TARGETS FOR COMPLIANCE REVIEW
 - DISSEMINATION OF ANALYZED DATA
 - RELIABLE MINORITY BUSINESS PARTICIPATION DATA

FEDERAL INSURANCE ADMINISTRATION

- PROGRAMS
 - NATIONAL INSURANCE DEVELOPMENT
 - NATIONAL FLOOD INSURANCE
 - CRIME INSURANCE

- EO DATA
 - COLLECTION –
 - CRIME INSURANCE
 - CONSIDER ANOTHER FORM
 - REQUIREMENTS-NONE APPARENT IN:
 - INSURANCE DEVELOPMENT
 - FLOOD INSURANCE

FEDERAL DISASTER ASSISTANCE

- PROGRAMS
 - DISASTER ASSISTANCE
 - STATE DISASTER PREPAREDNESS GRANTS
- EO DATA
 - COLLECTION – NONE
 - REQUIREMENTS – NONE APPARENT

POLICY DEVELOPMENT AND RESEARCH

- PROGRAMS
 - GENERAL RESEARCH AND TECHNOLOGY ACTIVITY
- EO DATA
 - COLLECTION - NO HUD FORMS USED TO COLLECT DATA

POLICY DEVELOPMENT AND RESEARCH

- **EO DATA**
 - **REQUIREMENTS**
 - **MINORITY/FEMALE CONTRACT AWARD DATA**
 - **DATA ON MINORITY/FEMALE RESEARCH PERSONS**
 - **STATED HUD EO RESEARCH ANNUAL GOALS**
 - **COLLECTION OF ELIGIBILITY DATA**
 - **GUIDANCE ON USE OF EO DATA BY MANAGEMENT**

INTERSTATE LAND SALES

- PROGRAM
 - LAND SALES – UNDEVELOPED PLOTS IN INTERSTATE COMMERCE
- EO DATA
 - COLLECTION – NONE
 - REQUIREMENTS – NONE APPARENT

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Equal opportunity data needs
- Final report

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DEPARTMENT OF BUSINESS
AND ECONOMIC DEVELOPMENT

STATE
MACHINERY CO.

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Evaluation Technologies, inc.
Equal opportunity data needs.

DATE