

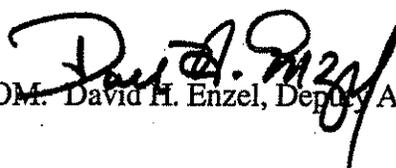


U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-2000

OFFICE OF THE ASSISTANT SECRETARY
FOR FAIR HOUSING AND EQUAL OPPORTUNITY

NOV 14 2002

MEMORANDUM FOR: All FHEO Hub Directors
All FHEO Program Center Directors
All FHEO Lead Equal Opportunity Specialist

FROM:  David H. Enzel, Deputy Assistant Secretary for Enforcement and Programs, ED

SUBJECT: Guidelines for FHEO Implementation of HUD Policy on Race and Ethnicity Data

REFERENCE: August 13, 2002, Memorandum from Alphonso Jackson, "New OMB Standards for Federal Data on Race and Ethnicity: HUD Policy Statement and Implementing Guidelines."

I. PURPOSE: The purposes of this memorandum are to: (1) transmit HUD's Policy Statement and Implementing Guidelines for the new Office of Management and Budget (OMB) Standards for Federal Data on Race and Ethnicity dated August 13, 2002; and (2) provide guidance to FHEO field staff on the use by recipients of this guidance.

II. BACKGROUND:

A. The 2000 Census made several changes to reflect the growing diversity of the U.S. population due to increased immigration from an expanding number of countries and the number of interracial unions. Specifically, the 2000 Census:

1. Changed the definitions of demographic categories (i.e., separated "Asian" from "Native Hawaiian and other Pacific Islanders");
2. Allowed respondents to identify themselves using racial categories; and
3. Provided for an independent ethnic category of Hispanic/non-Hispanic that was to be chosen among any single or combination of racial categories.

- B. On December 15, 2000, OMB issued guidelines for all agencies on conforming to the new census categories for collecting, maintaining, and reporting racial and ethnic data for statistical purposes, program administration, and civil rights compliance. The OMB Guidelines also provided alternative methodologies for "bridging" the statistical data gathered by means of the old categories with only single race and the new categories with multiracial and ethnicity selections.
- C. HUD's August 13, 2002, guidelines follow the OMB guidelines with specific application to HUD programs. (A copy is attached.)

III. RACIAL AND ETHNIC CATEGORIES:

- A. The five racial categories as revised by OMB are defined as follows:
1. ***American Indian or Alaska Native.*** A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
 2. ***Asian.*** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 3. ***Black or African American.*** A person having origins in any of the black racial groups of Africa. Terms such as "Haitian" or "Negro" can be used in addition to "Black or African American."
 4. ***Native Hawaiian or other Pacific Islander.*** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
 5. ***White.*** A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
- B. The two ethnic categories as revised by OMB are defined as follows:
1. ***Hispanic or Latino.*** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term, "Spanish origin," can be used in addition to "Hispanic or Latino."
 2. ***Not Hispanic or Latino.*** A person not of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

IV. DATA TABULATION AND REPORTING:

For tabulation and reporting purposes, program offices and HUD funded recipients should include all report fields that reflect, *at a minimum*, the 22 categories shown below. Any additional multiple race combination, which exceeds one percent (1%) of the local population and/or 1% the recipient's clients, should be reported as a separate category or discussed in narrative form.

Racial Category or Categories	Total	Hispanic or Latino
1. American Indian or Alaska Native	X	X
2. Asian	X	X
3. Black or African American	X	X
4. Native Hawaiian or Other Pacific Islander	X	X
5. White	X	X
6. American Indian or Alaska Native <i>and</i> White	X	X
7. Asian <i>and</i> White	X	X
8. Black or African American <i>and</i> White	X	X
9. American Indian or Alaska Native <i>and</i> Black or African American	X	X
10. Balance of individuals reporting more than one race	X	X
11. Total	X	X

V. SPECIFIC FHEO DATA:

A. Enforcement

1. FHEO collects data with the TEAPOTS system for enforcement activities. The race and ethnicity data currently collected in TEAPOTS are only collected to the extent that it is the basis on which someone has alleged discrimination. These data fields have already been amended to reflect the new racial categories. Multiracial categories are being incorporated at the present time and "Hispanic/Non-Hispanic" were previously added as a separate item, bringing the total to twenty-two categories. "Non-Hispanic" should never be chosen unless it is the basis for the complaint. The "total" for statistical purposes will be the sum of the number of complainants rather than the total number of categories selected.
2. The non-system intake/complaint forms only allow the complainant to select "race" and "national origin" and the bases are then entered as text. HUD then determines the correct manner to enter the data into TEAPOTS, as it has in the past.
3. No formal "bridging" mechanism is needed since in the past less than 1% of complainants selected multiple categories for the complaint and TEAPOTS can calculate these.

B. Fair Housing Initiatives Program/Fair Housing Assistance Program (FHIP/FHAP):
The two FHEO-funded programs are FHIP and FHAP. FHIP and FHAP recipients should all be keeping records on the beneficiaries. Their data systems are developed internally and FHEO has not previously asked them for specific information concerning these systems.

1. **FHAP:** All existing and future FHAP agencies will be expected to keep records in accordance with the guidance provided for FHEO Enforcement noted in Paragraph V. A. of this memorandum.
2. **FHIP:** A requirement will be placed in the FY 2003 FHIP NOFA requesting all applicants to show how they will maintain racial and ethnic data for those receiving their services.

VI. FOLLOW-UP ACTIONS:

The Office of Programs will provide guidance to FHIPs and FHAPs in their grant agreements or cooperative agreements. However, language cannot be developed until the General Section of the Super Notice of Funds Availability is finalized.

VII. QUESTIONS AND CONCERNS:

Questions regarding this guidance may be directed to Ms. Laretta Dixon, Director, Office of Programs or Ms. Pamela Walsh, Director, Program Standards Division. The phone number for both Ms. Dixon and Ms. Walsh is (202) 708-2288. Ms. Dixon's extension is 7051 and Ms. Walsh's extension is 7017.

Attachment