



OFFICE of
INSPECTOR GENERAL
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UNITED STATES DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

Fair Housing Initiatives Program Organizations Promoted Equity in the Education and Outreach Initiative

Audit Report Number: 2024-BO-0002

February 16, 2024

To: Lynn M. Grosso
Deputy Assistant Secretary for Enforcement, Office of Fair Housing and Equal Opportunity, ED

//signed//
From: Kilah S. White
Assistant Inspector General for Audit, Office of Inspector General, GA

Subject: Fair Housing Initiatives Program Organizations Promoted Equity in the Education and Outreach Initiative To Reach Underserved Populations.

Attached is the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our audit of Fair Housing Initiatives Program organizations' promotion of equity in the Education and Outreach Initiative.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, as amended, requires that OIG post its reports on the OIG website. Accordingly, this report will be posted at <https://www.hudoig.gov>.

If you have any questions or comments about this report, please do not hesitate to call Ronald J. Lloyd, Audit Director, at (617) 994-8380.

Highlights

Fair Housing Initiatives Program Organizations Promoted Equity in the Education and Outreach Initiative | 2024-BO-0002

What We Audited and Why

We audited the U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity, Fair Housing Initiatives Program (FHIP), Education and Outreach Initiative (EOI). We conducted this audit to help HUD determine whether the education and outreach provided was going to the people who have been systematically denied full housing opportunity. Our audit objective was to assess how FHIP organizations promoted equity within the EOI to reach underserved populations.

What We Found

FHIP organizations promoted equity within the EOI to reach underserved populations. We reviewed a selection of 10 FHIP organizations and found that they (1) researched and identified need in their area that included underserved populations, (2) developed a statement of work to address the need identified, and (3) developed a strategy to evaluate their performance. FHIP organizations performed research to complete needs assessments, using census data; local studies; their own past performance; and research on emerging issues, such as new laws focused on underserved populations. They evaluated their performance to ensure that their outreach provided impact, using client feedback, social media impressions, and intake referrals. As a result, the FHIP organizations provided fair housing outreach and education to underserved populations to increase awareness of fair housing rights and responsibilities.

What We Recommend

This report contains no recommendations.

Table of Contents

Background and Objective	1
Results of Audit	3
Fair Housing Initiatives Program Organizations Promoted Equity in the Education and Outreach Initiative	3
Scope and Methodology	7
Appendix	9
Auditee Comments and OIG’s Evaluation.....	9

Background and Objective

The Fair Housing Act, as amended, prohibits discrimination on the basis of race, color, religion, national origin, sex, disability, and familial status. The Act applies to certain issues, including harassment and discrimination in the sale, rental, advertising, or financing of housing; the provision of brokerage services; and other activities related to residential real estate transactions. With some exceptions, the Act covers all “dwellings,” which are defined generally as buildings designed to be used in whole or part for a residence, as well as vacant land offered for sale and lease for constructing or locating a building. The Act gives the U.S. Department of Housing and Urban Development (HUD) authority and responsibility to administer the Act.

HUD’s Office of Fair Housing and Equal Opportunity (FHEO) is the office responsible for investigating allegations of housing discrimination. FHEO is charged with development, administration, enforcement, and promotion of public understanding of Federal fair housing policies and laws. FHEO’s activities include investigating fair housing complaints, ensuring compliance with civil rights laws in HUD programs, conducting compliance reviews, managing fair housing grants, and increasing public awareness of fair housing rights and responsibilities. To assist in its mission, FHEO enters into grant agreements with State and local governments, nonprofit organizations, and other public and private entities under the Fair Housing Initiatives Program (FHIP). FHIP organizations partner with HUD to help people identify government agencies that handle complaints of housing discrimination. FHIP has four initiatives, including (1) the Fair Housing Organizations Initiative, (2) the Private Enforcement Initiative, (3) the Education and Outreach Initiative (EOI), and (4) the Administrative Enforcement Initiative.¹

The EOI provides funding to State and local governments and nonprofit organizations for initiatives that educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws. Activities eligible for funding include developing education materials, analyzing local impediments to housing choice, providing housing counseling and classes, convening meetings that bring the housing industry together with fair housing groups, developing technical materials on accessibility, and mounting public information campaigns.

On January 20, 2021, President Biden signed Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. The executive order mandates that the Federal Government pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. The executive order defines equity as the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and indigenous and Native American persons; Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. The executive order defines underserved communities as populations sharing a particular characteristic as well as geographic communities that have been systematically denied full opportunity to

¹ The Administrative Enforcement Initiative is not funded.

participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of equity.

FHEO awarded discretionary grants and cooperative agreements through a notice of funding opportunity (NOFO). For fiscal year 2021, the EOI NOFO contained a rating system for ranking applicants and included policies throughout the rating system that promoted equity and ensured that applicants addressed the needs of underserved populations. These rating factors required applicants to

- Describe how they would meet the needs of highly segregated, rural, or underserved populations.
- Develop a statement of work narrative that identified quantifiable project goals and described how those goals were related to each of the needs of the highly segregated, rural, or underserved populations.
- Outline a strategy for evaluation of program performance, which included measurement and an evaluation plan.

The 2021 NOFO defined underserved populations as groups of individuals who are (1) persons of an immigrant population (especially racial and ethnic minorities who are non-English speaking or have limited English proficiency); (2) persons living in a rural area, particularly minority groups in such areas; (3) persons who are homeless or otherwise experiencing housing instability; (4) persons with disabilities (physical or mental); and (5) persons in areas where there is inadequate protection and ability to provide fair housing services from a State or local government or private fair housing organization.

In addition to these five populations, the 2021 NOFO expanded the definition of underserved populations to include (1) persons living in impoverished areas or experiencing persistent poverty or inequality, including historical wealth disparities as compared to majority groups; (2) LGBTQ+ persons, particularly LGBTQ+ youth; (3) indigenous and Native American persons; and (4) due to the COVID-19 pandemic, persons experiencing housing instability or whose access to opportunity has been exacerbated.

FHIP organizations are required to submit quarterly and final reports to FHEO to report on their progress from their statement of work. In these reports, FHIP organizations are also required to report on how many clients were served based on their education and outreach efforts. In fiscal year 2021, FHEO awarded more than \$9.4 million for the general component of the EOI by executing grant agreements with 76 FHIP organizations.

Our audit objective was to determine how FHIP organizations promoted equity in the EOI to reach underserved populations.

Results of Audit

Fair Housing Initiatives Program Organizations Promoted Equity in the Education and Outreach Initiative

FHIP organizations promoted equity in the EOI to reach underserved populations. We reviewed a sample of 10 FHIP organizations and observed that they (1) researched and identified a need in their area that included underserved populations, (2) developed a statement of work to address the needs identified, and (3) developed a strategy to evaluate their performance. The FHIP organizations performed research to complete needs assessments, using census data; local studies; their own past performance; and research on emerging issues, such as new laws focused on underserved populations. The deliverables in the statement of work included training, workshops, social media, email newsletters, public service announcements, and fact sheets. The FHIP organizations evaluated their performance to ensure that their outreach provided impact, which included client feedback through surveys, social media impressions, and intake referrals.

Additionally, FHEO promoted equity through its policies and procedures, which the FHIP organizations generally followed when administering their grants. FHEO also awarded discretionary grants through a NOFO, and for fiscal year 2021, the EOI NOFO included a rating system, which included policies to ensure that applicants addressed the needs of underserved populations. As a result, the FHIP organizations provided fair housing outreach and education equitably to underserved populations to increase awareness of fair housing rights and responsibilities and provided support to FHEO through quarterly and final reports.

FHIP Organizations Promoted Equity Within the EOI To Reach Underserved Populations

We selected a total of 10 FHIP organizations, as detailed in the table below, to determine how they promoted equity within the EOI to reach underserved populations. We focused our selection to include an FHIP organization with the largest population covered from each of HUD's 10 regions, which, in total, provided coverage for more than 52 million people.

FHIP sample number	HUD region	Population covered	Main methods of outreach	Main target populations
FHIP 1	1	5,294,521	Public service announcements, conferences, college courses, and a documentary film	-Highly segregated
FHIP 2	2	1,083,610	Training and outreach sessions, community roundtables, social media, and public service announcements	-Highly segregated, rural, and underserved -Homeless persons -Limited English proficiency

FHIP 3	3	8,631,384	Fair housing events and fairs, advertisements, and social media	-Highly segregated populations that suffer from discrimination
FHIP 4	4	10,439,414	Listening sessions, brochures, fair housing training, and social media	-Persons with disabilities -Racial and ethnic minorities -Limited English proficiency -LGBTQ+
FHIP 5	5	6,877,554	Educational outreach, group training and advocacy, and social media	-Segregated populations -Persons experiencing housing instability -Persons with disabilities
FHIP 6	6	4,657,749	Outdoor signage campaign; partnerships with local, municipal, and county agencies; and social media	-Native Americans -Persons with disabilities -LGBTQ+ -Persons experiencing housing instability
FHIP 7	7	2,451,508	Trainings, workshops, and technical assistance; fair housing materials; and social media	-Segregated communities -Persons with disabilities -Immigrants -Limited English proficiency
FHIP 8	8	779,091	Education materials, fair housing and appraisal process frequently asked questions, community conversations, fair housing events, newsletters, social media, and public service announcements	-Marginalized populations -Refugees -Native Americans -Low-income women who are often targets of sexual harassment
FHIP 9	9	10,230,447	Housing education events, literature, newsletter, social media, advertisements, and a website	-Discriminated persons -Limited English proficiency -Homeless seniors and persons with disabilities
FHIP 10	10	1,839,092	Fair housing ambassadors, interpreting and translating services, events for underserved populations and housing providers, public service announcements, videos, and social media	-Limited English proficiency -Veterans -Persons reentering the housing market -LGBTQ+ -Homeless
Total		52,284,370		

Each FHIP organization completed a needs assessment to identify underserved populations that would benefit from increased awareness of fair housing rights and responsibilities and the assistance available to them. The FHIP organizations completed the assessments, using census data; local studies; their own

past performance; and research on emerging issues, such as new laws focused on underserved populations. For example, one FHIP organization used a report that included an analysis of impediments to fair housing choice to evaluate the degree to which private- and public-sector policies, practices, statutes, and programs expanded or restricted housing choice for members of the protected classes. The report used census data to identify areas with concentrations of minority populations, residential segregation, limited English proficiency, disabilities, and poverty. The FHIP organization used the report to identify impediments, which included (1) discrimination in rental housing based on race and disability, (2) a lack of understanding of fair housing laws in rural areas, (3) an inadequate supply of affordable and accessible rental housing, (4) low rates of home ownership among Black and Hispanic households, (5) inadequate understanding of fair housing laws by local governments in small towns, and (6) a need for materials for limited English proficiency populations. Using this information, the FHIP organization was able to target areas of underserved populations.

To increase awareness, FHIP organizations developed deliverables, including trainings and workshops, receiving social media impressions, distributing newsletters and fact sheets, and conducting public service announcements. These deliverables were directed at underserved populations to increase public knowledge of housing protections and enforcement, increase public access to fair housing materials and information, and increase the capacity of these FHIP organizations to provide fair housing materials and services. All of the 10 sampled FHIP organizations met or exceeded the deliverables in their statements of work, according to their quarterly and final reports and supporting documentation, such as attendance sheets, fair housing materials and distribution lists, social media analyses, and public service announcements or advertising outreach.

Combined, the 10 FHIP organizations conducted public service announcements and advertisement campaigns, using radio, newspapers, buses, and billboards to reach more than 11 million people. In total, they generated social media impressions from more than 1.6 million people and had website and blog impressions from more than 238,000 people. They also held 278 outreach events, including community conversations, workshops, roundtables, trainings, and fair housing sessions, that were attended by 12,475 people. For example, one FHIP organization conducted a training targeted at architects, builders, code officials, and advocates, regarding fair housing and reasonable accommodations. This technical training was designed to teach about the Fair Housing Act's design and construction requirements with which properties must comply, how to comply, and how the requirements are enforced.

Another FHIP organization launched a multimedia outdoor signage campaign, which used billboards, bus shelters, bus tails, and bus kings and provided outreach to commuters, focused on general fair housing rights and appraisal discrimination awareness. This campaign generated more than 10 million impressions. Another FHIP organization used its grant to complete a documentary, focusing on the history of decades of discriminatory housing policies in its geographic area. In doing so, it highlighted issues faced by other communities across the country, with a focus on fair housing history and its impact on housing today. The documentary was shown at a local film festival in June 2023 and included a panel discussion after the documentary, which continued the housing discrimination discussion.

The 10 FHIP organizations also collected feedback from clients as required by the grant agreements. However, there is no specific client feedback defined that is required, and it is up to the FHIP organizations to support the completion of their planned tasks from their statements of work. Our review showed that the 10 FHIP organizations reported client feedback on some of their program tasks. The client feedback the FHIP organizations collected included (1) surveys or evaluations for training and

workshops, (2) referrals for complaint intake, and (3) analysis for social media outreach. These FHIP organizations collected client feedback via surveys or evaluations for training and workshops and referrals for complaint intake, and all but one of the FHIP organizations collected feedback via analysis of social media outreach.

The sampled FHIP organizations reported analyzing client feedback and using the information to improve their outreach. One FHIP organization, following each education and outreach event, would provide event materials to each participant, along with a link to take a survey. In the survey, the FHIP organization asked participants why they attended, whether the information was useful, how likely they were to recommend the course, what they enjoyed about the training, what could be improved, and whether there were any topics they wanted covered in the future. This FHIP organization reported reviewing the feedback quarterly to understand how its outreach resonated with clients. The FHIP organization used the data to add topics to future events and stakeholder engagement, as well as social media and billboard campaigns, and pivoted when it seemed necessary or desired by community members.

Conclusion

Sampled FHIP organizations promoted equity through HUD's EOI, providing fair housing outreach and education to underserved populations and accomplishing the program's goal to increase awareness of fair housing rights and responsibilities. Specifically, FHIP organizations used their resources to determine the need in their area and develop a statement of work with a narrative to identify quantifiable project goals that related to those needs. Each of the FHIP organizations was then able to meet or exceed the goals set forth in its respective statement of work. Further, these FHIP organizations prioritized the use of client feedback to adjust and improve services. In meeting those goals, these FHIP organizations were able to educate the public and housing providers about their rights and responsibilities under Federal law or State and local fair housing laws that are substantially equivalent to provisions of the Fair Housing Act.

Recommendations

This report contains no recommendations.

Scope and Methodology

We performed our audit work from April through October 2023 remotely and at our office located in Hartford, CT. The audit generally covered the period October 2021 through October 2022. To review the fiscal year 2021 FHIP agreements that concluded in fiscal year 2023, we expanded our audit period to May 2023.

To accomplish our objective, we

- Reviewed relevant laws, regulations, NOFOs, and HUD's guidance;
- Interviewed FHEO staff to gain an understanding of the EOI;
- Selected and reviewed 10 FHIP organizations from a universe of 76 FHIP organizations that received a grant through the fiscal year 2021 general component of the FHIP EOI to assess how they promoted equity in the EOI. We used the following factors to make our selection: (1) one from each of HUD's ten regions, (2) largest population covered, and (3) completed grantee agreements. We focused our selection on 10 FHIP organizations due to the impracticability of reviewing documentation for the whole universe. The results of our selection cannot be used to project on the whole universe.

For each FHIP organization, we reviewed the grant application, grant agreement, and performance reports. Specifically, we reviewed the documentation to determine how the organization

- determined need and any proposed solution to that need,
 - measured and evaluated results,
 - used client feedback, and
 - supported the completion of statement of work deliverables.
- Using Microsoft Forms, we surveyed the 10 FHIP organizations and asked the following questions:
 - How do you determine the need in your area where you will target your outreach?
 - How do you ensure that your research includes underserved populations?
 - How do you determine the specific activities and outreach that you will provide to have the greatest impact?
 - How do you measure that impact?
 - What data do you collect on program participants, how are the data maintained, and what do you do with the data?
 - How do you collect feedback from the clients that you provide outreach to?
 - How do you use client feedback to inform your outreach?
 - What additional information can you provide?

We received nine responses to our survey, resulting in a response rate of 90 percent (9 of 10).

To achieve our objective, we did not rely on data from information systems. We reviewed source documentation to assess how the FHIP organizations promoted equity and found the data reviewed to be adequate for our purposes.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective(s). We believe

that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix

Auditee Comments and OIG's Evaluation

On January 19, 2024, we issued the discussion draft report to the Deputy Assistant Secretary for Enforcement. On February 2, 2024, the Deputy Assistant Secretary for Enforcement informed us that HUD chose not to provide formal written comments for inclusion in the final report.