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# **Evaluation of the Fair Housing Initiatives Program (FHIP)**

## **Justification for FHIP Survey**

**(C-CHI-00885)**

**Revised July 18, 2007**

Submitted To:

**U.S. Department of Housing and Urban Development  
Attn: Todd Richardson**

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# Evaluation of the Fair Housing Initiatives Program Web Survey

## ***PART A JUSTIFICATION***

### **A1) Circumstances that Make the Collection of Information Necessary**

The Department of Housing and Urban Development's (HUD's) FY 2007 Annual Performance Plan (APP) specifies six strategic goals. They are to: (1) increase homeownership opportunities; (2) promote decent affordable housing; (3) strengthen communities; (4) ensure equal opportunities in housing; (5) embrace high standards of ethics, management, and accountability; and (6) promote the participation of faith-based and community organizations. Associated with each goal are several strategic objectives; the FY 2007 APP links these goals and objectives with HUD's policies, programs, budget resources, and impacts on communities. It links measures of desired societal outcomes, such as increasing homeownership rates, with programmatic indicators of outputs from HUD programs. It also cites key external factors, such as macro-economic conditions, consumer confidence, mortgage interest rates, tax policies, and the like, that affect those outcomes, but that are typically beyond HUD's control.

One of HUD's outcome indicators measuring performance with respect to strategic goal Number 5—embracing high standards of ethics, management, and accountability—is improving accountability, service delivery, and customer service of HUD and its partners. According to the APP:

This strategic objective reflects HUD's extensive use of the partnership model as a fundamental aspect of its operations. HUD's partners include state and local governments, nonprofit and for-profit organizations, and other federal agencies, as well as Congress, for developing the course of Departmental policies and providing budget resources. Desired management improvements and accountable, measurable performance improvements must both be developed in conjunction with and accomplished through the actions of our partners.

HUD has completed the Office of Management and Budget's Program Assessment Rating Tool evaluation on 25 major program areas, representing over 80 percent of HUD's budget, to identify areas in need of actions to improve the focus of performance measures and establish efficiency measures. HUD continues to work with the Office of Management and Budget to develop and use efficiency measures for major programs and to reduce the number and improve the focus of performance measures covering the Department's core goals and objectives (p.60).

The data collection outlined in this package will provide otherwise unavailable information essential to measuring the current effectiveness of the Fair Housing Initiatives Program (FHIP) and potentially offering new measures that can be used to annually assess FHIP's effectiveness. One of the activities planned as part of the evaluation of the FHIP program is conducting a web, and for a subsample of non-respondents, a telephone survey of recipients of FHIP funds in FY 2003, FY 2004, and FY 2005. To estimate the amount of time it would require to respond to the proposed survey, two former executive directors of FHIP organizations completed the survey as they would have when they were running their FHIP programs. This data collection activity is authorized under [12.U.S.C. 1701z-1], which reads as follows:

TITLE 12--BANKS AND BANKING

CHAPTER 13--NATIONAL HOUSING

Sec. 1701z-1. Research and demonstrations; authorization of appropriations; continuing availability of funds

The Secretary of Housing and Urban Development is authorized and directed to undertake such programs of research, studies, testing, and demonstration relating to the mission and programs of the Department as he determines to be necessary and appropriate. There is \1\ authorized to be appropriated to carry out this title [12 U.S.C. 1701z-1 et seq.] \$35,000,000 for fiscal year 1993 and \$36,470,000 for fiscal year 1994.

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\1\ So in original. Probably should be ``are''.  
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(Pub. L. 91-609, title V, Sec. 501, Dec. 31, 1970, 84 Stat. 1784; Pub. L. 94-375, Sec. 23(a), Aug. 3, 1976, 90 Stat. 1078; Pub. L. 95-128, title II, Sec. 204, Oct. 12, 1977, 91 Stat. 1129; Pub. L. 95-557, title III, Sec. 305(a), Oct. 31, 1978, 92 Stat. 2097; Pub. L. 96-153, title III, Sec. 304, Dec. 21, 1979, 93 Stat. 1112; Pub. L. 96-399, title III, Sec. 303, Oct. 8, 1980, 94 Stat. 1639; Pub. L. 97-35, title III, Sec. 337, Aug. 13, 1981, 95 Stat. 414; Pub. L. 98-181, title IV, Sec. 466(a), Nov. 30, 1983, 97 Stat. 1236; Pub. L. 100-242, title V, Sec. 564, Feb. 5, 1988, 101 Stat. 1945; Pub. L. 101-625, title IX, Sec. 951(a), Nov. 28, 1990, 104 Stat. 4417; Pub. L. 102-550, title IX, Sec. 901, Oct. 28, 1992, 106 Stat. 3866.)

References in Text

This title, referred to in text, is title V of the Housing and Urban Development Act of 1970, Pub. L. 91-609, Dec. 31, 1970, 84 Stat. 1784, as amended, which is classified generally to section 1701z-1 et seq. of this title. For complete classification of this Act to the Code, see Short Title of 1970 Amendments note set out under section 1701 of this title and Tables.

Codification

Section was enacted as part of the Housing and Urban Development Act of 1970, and not as part of the National Housing Act which comprises this chapter.

**A2 How and By Whom the Data Will Be Used**

## **A2.1 Project Overview**

This survey is being conducted as part of a larger process and outcome evaluation that will use data from this survey, in-depth interviews with fewer than nine agencies, and various sources of administrative data. The overall study will provide a program history, identify different agency types and approaches to pursuing fair housing enforcement and education activities, and attempt to identify what value FHIP agencies add to the enforcement process by comparing the quality and outcomes of complaints filed with HUD by FHIP agencies to similar cases filed without FHIP agency involvement.

This FHIP agency survey will show how FHIP grantees use the funds they receive from HUD to conduct fair housing activities. It will also show how other monetary resources are implemented and how much of their activities are fair-housing related. It will also show which activities are common to FHIP grantees throughout the nation and which are regional or local.

The data collected from the different organizations will be compared to determine what activities can be used to effectively and efficiently assess the program annually.

## **A2.2 Purpose of the Data Collection**

As indicated, the purpose of the data collection is to determine how FHIP agencies use the funds they receive from HUD; for what activities; and to determine what data might be used to annually track program performance. The data will be used as part of the FHIP process evaluation to answer the following set of research questions about agencies that received a FHIP grant in one or more of the fiscal years 2003, 2004, and 2005:

- What are the characteristics of FHIP grantees? Mission, overall size of organization (employees and budget size), size of fair housing component (employees and budget size),
- How do the agencies fair housing activities relate to the organization's broader mission?
- What are the agencies' governance structure and administrative structure?
- What are staff experience, length of tenure, and education/skills? How much of FHIP fair housing activity is paid for through FHIP grant funds versus other resources? What are the sources of other resources and how consistently available are those funds?
- What is the funding history of the organization for fair housing activities and how does that relate back to agency stability (such as staff stability)?
- What types of activities did PEI grantees propose to undertake (create a typology)?
- What were the goals for those activities (create a typology)?
- How did the individual PEI goals and activities relate back to HUD's policy priorities in each year?
- To what extent did the PEI grantees achieve the goals described in their proposals and logic models?
- How do PEI grantees manage fair housing complaints? What are their step-by-step practices?
- How many PEI grantees conduct fair housing testing? How large are their testing programs (number of tests conducted annually)? What are their procedures (tester

recruitment, training, and protocols)? What types of testing did they conduct (rental, sales, homeowner's insurance, etc.)? To what extent was testing done in relation to a complaint, vs. another objective, such as research or based on other information? In what circumstances does an agency decide to undertake testing activities? What is the cost per test?

- What are the outcomes for all complaints received, regardless of funding source? How many are closed with no action? How many are referred to HUD or FHAP agencies for investigation? How many are taken directly to state or federal court?
- What types of activities did EOI grantees propose to undertake (create a typology)? What were the goals for those activities (create a typology)? How did the individual EOI grantee's goals and activities relate back to HUD's policy priorities in each year? To what extent did the EOI grantees achieve the goals described in their proposals and logic models?
- Does the grantee undertake EOI activities with non-EOI resources? What are those resources?
- Is there a relationship between education and outreach activities and complaint volume?

### **A2.3 Who Will Use the Information**

HUD's Office of Policy Development and Research (PD&R), in conjunction with HUD's Office of Fair Housing and Equal Opportunity (FH&EO), will use this information to assess the effectiveness of the FHIP program and the activities undertaken by its grantees.

### **A2.4 Instrument--Item-By-Item Justification**

Respondents will consist of approximately 184 fair housing organizations in the United States. The instrument consists of questions that have not been used in a survey of this type. The survey can be divided into ten parts:

**Contact Information.** Contact information on the respondent is being collected to allow for follow-up calls to clarify responses, if necessary.

**Organization Mission.** Two short questions are presented to respondents to determine the mission of the organizations for which they work. HUD is using the questions to understand the variety of fair housing organizations throughout the country and the priority fair housing has within that organization.

**Organization Structure.** Five questions and subparts are presented to respondents to show what proportion of FHIPs are nonprofits or other types of organization, if they are members of other civil rights organizations, and the characteristics of their boards of directors. These data will be used to see if organizational structure, relationships with other organizations, and board of director affiliation impact on the priorities and approach of FHIP agencies.

**Organization History.** Three questions and subparts are presented to respondents to learn about the history of the FHIP organization. HUD wants to know about the organization, including how

long it has been in existence, how long it has been providing fair housing services, and its organizational stability.

***Service Area and Population.*** Six questions and subparts are presented to respondents to learn about the service area and population of the organization. HUD wants to determine if there are differences in capacity and approach based on service area and targeted population. HUD also wants to assess the approximate national coverage of FHIP agencies. That is, approximately what proportion of the US population is reasonably served by FHIP groups? HUD also want to understand how FHIP agencies market their program and how most clients report they learned about fair housing groups.

***Technology.*** One question with five subparts ask about what technology the FHIP grantees use in their daily work. Use of technology can substantially increase the efficiency and effectiveness of organizations. There is anecdotal evidence that FHIP groups have very different technology capabilities. The survey will document if limited use of technology is a problem for these agencies.

***Employees.*** Five questions and subparts are presented to respondents to learn about the employees of the FHIPs. HUD wants to know the demographics, education, experience, staff longevity, and training/certifications of the staff that work for these agencies. This information is critical for understanding organizational effectiveness and stability.

***Budget.*** Five questions and subparts are presented to respondents to learn about the financial stability of fair housing organizations. One of the core goals of this evaluation, for HUD, is to understand the financial stability of fair housing organizations from year-to-year. The questions ask about total budget, sources of funding for fair housing activities, and general budget stability from year-to-year.

***Enforcement Activities.*** Thirty-three questions and subparts are presented to respondents to learn about how FHIP agencies undertake enforcement activities and how important the Private Enforcement Initiative (PEI) Grant for doing that work. HUD wants to create a typology of activities conducted by PEI organizations and determine how much investigation and testing are conducted by these organizations.

***Education and Outreach Activities.*** Ten questions and subparts are presented to respondents to learn about Education and Outreach Initiative (EOI) Grant activities. HUD wants to create a typology of activities conducted by EOI organizations and determine how much funding of EOI activities was conducted by FHIP and what activities were covered by other resources.

***FHIP Program Overall.*** Six questions and subparts are presented to respondents to get their thoughts about the FHIP program overall. Do the agencies see any implementation problems? What are their most significant organizational challenges? What is there view on potential program changes? This information will help HUD in its policy discussions on making changes to the program.

### **A3) Use of Improved Technologies**

The survey will be conducted by web-based technology as first choice. DB Consulting will make full use of the latest methodological and technical developments in web-based surveying. However, since most

recipients of the FHIP funding are nonprofit agencies, HUD will also employ telephone interviewing for agencies that do not respond to the web-based survey.

#### **A4) Efforts to Identify Duplication**

There is no other national survey assessing the current effectiveness of FHIP. Prior to this submission, a literature search as well as an inquiry of experts found no other comparable survey. Experts consulted included staff in HUD's Office of Policy Development and Research, HUD's Office of Fair Housing and Equal Opportunity, and organizations located in other communities across the country that are primarily involved in fair housing.

#### **A5) Involvement of Small Entities**

All respondents to this survey will be FHIP-funded recipients for FY 2003, FY 2004, and FY 2005. Most of these entities are small non-profit organizations. The cost to these organizations is the time to complete the survey. In addition, the survey is being conducted by DB Consulting, a small business.

#### **A6) Consequences of Less Frequent Data Collection**

With this survey, HUD intends to measure the effectiveness of the FHIP through use of fair housing enforcement activities and public information campaigns relating to federal fair housing laws over the past year. Less frequent measurement will allow more time to go by without the benefit of information about the outcomes of private fair housing groups' efforts to enhance public awareness of fair housing laws and enforcement, which, in turn is presumed to reduce discriminatory actions. There are both significant public costs and adverse consequences to discriminatory actions such as less diverse areas having a lower income tax base.

#### **A7) Special Circumstances**

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public--General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

#### **A8) Consultations outside the Agency**

In accordance with the Paperwork Reduction Act of 1995, HUD published a Notice in the *Federal Register* announcing the Agency's intention to request an OMB review of this data collection. The Notice was published on December 11, 2006, (Docket No. \_FR-5403-N-11) in Volume 71, Number 237, page 71551, and provided a 60-day period for public comments. A copy of this Notice appears in the Annex. No comments were received based on this publication.

One very experienced FHIP grantee was consulted on the survey who provided extensive comments on burden, question clarity, and policy utility. In response to those comments, several questions were dropped and/or shortened. Other questions were clarified and some new questions were added.

**A9) Payments to Respondents.**

No payments are being made to respondents who voluntarily agree to participate in this data collection.

**A10) Arrangements and Assurances Regarding Confidentiality**

The data set to be provided to the Government from this survey will not contain any identifying information—such as name, address, etc.—that would permit disclosure or identification of respondents.

**A11) Sensitive Questions**

The questions being asked are not considered sensitive.

**A12) Estimate of Annualized Burden Hours**

Total annualized burden hours are estimated at 199. Exhibit 1 provides detailed information on the estimated respondents’ time to complete the data collection and the total respondents’ burden for the data collection effort.

**Exhibit 1**

| A                     | B                               | C                             | D                   | E                                 | F                           | G                            |
|-----------------------|---------------------------------|-------------------------------|---------------------|-----------------------------------|-----------------------------|------------------------------|
| Number of Respondents | Burden per Respondent (Minutes) | Total Annual Burden (Minutes) | Number of Responses | Total Respondent Burden (Minutes) | Total Burden per Respondent | Total Project Burden (Hours) |
|                       |                                 | (A x B)                       |                     | (C x D)                           | (B x D)                     |                              |
| 184                   | 65                              | 11,960                        | 1                   | 11,960                            | 65                          | 199                          |

**A13) Estimated Record Keeping and Reporting Cost Burden on Respondents**



The cost burden to respondents is the time required to respond to the FHIP Web survey questions, including the time to look up information. The survey is requesting information from the FHIP agencies that cannot be obtained any other way. No additional record keeping is required.

#### **A14) Estimated Cost to the Federal Government**

The total contracted cost to the Federal government for the study is \$500,000. This includes the design, all data collection, and the cost to analyze and report the results. The contractor has 303 hours and \$30,143 budgeted for completion of this survey.

#### **A15) Reasons for Changes in Burden**

The change in burden is occurring because this is a new survey, and no prior burden exists.

#### **A16) Tabulation Plans, Statistical Analysis, and Study Schedule**

When the data collection is completed by the contractor, they will then analyze the data and prepare an initial report for HUD. The report will include the analysis of the collected data to answer the questions posed in Section A2.2. Findings from the study may result in recommendations for performance measures that could be used annually. Data collection is scheduled to begin in June 2007. A report is scheduled to be delivered in November 2007.

#### **A17) Expiration Date Display Exemption**

Any reproduction of the data collection instrument will prominently display the OMB approval number and expiration date.

#### **A18) Exceptions to Certification**

This submission, describing data collection, requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).

