

March 2, 2022

Mr. Tyler Glotfelty

Policy Analyst (Detaille) Office of Management and Budget Office of Information and Regulatory Affairs New Executive Office Building Washington, DC 20503

RE: OMB Control Number 2502-NEW, "Equity in Housing Counseling Survey"

Dear Mr. Glotfelty:

The Department of Housing and Urban Development's (HUD) Office of Housing Counseling (OHC) seeks an emergency review of the Paperwork Reduction Act requirements for the Housing Counseling Program. OHC respectfully requests a 7-day PRA Emergency approval.

The emergency review is needed because the survey is a vital tool in OHC's response to the COVID-19 national health emergency that is having a disproportionate impact on under-represented communities, including communities of color, low-to-moderate income communities, and rural communities. Addressing this disproportionate impact is in line with critical elements of HUD's strategic plan, and HUD Secretary Marcia Fudge has spoken publicly about the urgency of this issue.

The survey will assist OHC with identifying and developing innovative programming and best practices to make housing stability and wealth creation a reality for more Americans amidst these unprecedented economic and public-health challenges. Specifically, the survey will help OHC:

1.) Gather critical data about the disproportionate impact the national health emergency has had on communities of color and other underserved populations targeted by HUD and the Office of Housing Counseling.

2.) Identify, develop, and implement a comprehensive approach to leverage the power of housing counseling agencies to achieve racial equity in housing during the ongoing COVID-19 public health emergency.

3.) The survey is also a vital part of OHCs initiative to create and coordinate an outreach campaign that will increase participation in housing counseling programs within targeted minority communities to address urgent challenges around eviction, foreclosure, homelessness, and other time-sensitive housing crises

In summary, the Equity in Housing Counseling Survey will enable OHC to advocate for, and reinforce the critical role of, housing counseling in meeting the nation's housing needs during the COVID-19 pandemic and related economic downturn, as well as to fulfill its mission of ensuring that families have the knowledge necessary to obtain, sustain, and retain housing.

In addition, it is important for OHC to share the survey's findings with our industry partners, as well as internal and external stakeholders, during Fair Housing Month in April 2022 at a Virtual Research Symposium on the Impact of Pre-Purchase Housing Counseling. Due to the significance and relevance of the data being shared, The Equity in Housing Counseling Survey will be a critical instrument that must be completed, distributed, and the results analyzed prior to the symposium. As such, it is important that the Office of Housing Counseling receives and processes the survey results expeditiously.

OHC has prepared the emergency PRA package for OMB Collection 2502-NEW "Equity in Housing Counseling Survey".

In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 7 days from the date of publication of the Federal Register Notice. OHC respectfully requests a 7-day Emergency PRA approval in order for OHC to distribute the survey, process and analyze the results quickly and accurately within the timeframe allotted.

David Berenbaum

## David Berenbaum

Deputy Assistant Secretary Office of Housing Counseling

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