

**Request for Approval under the "Generic Clearance for Improving  
Customer Experience: OMB Circular A-11, Section 280  
Implementation"  
(OMB Control Number: 2511-0001)**

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**TITLE OF INFORMATION COLLECTION:** Equitable Engagement at HUD -  
Credit-Related Barriers to Homeownership

**PURPOSE OF COLLECTION:**

To surface potential actions that HUD can take to create more equitable opportunities and close the racial homeownership gap, HUD is seeking to gather input directly from populations who experience credit-related barriers to homeownership. HUD is testing the hypothesis that the inability to demonstrate credit worthiness due to poor credit history or no credit history and biased credit requirements excludes many individuals from getting approved for a mortgage. Expected barriers include poor traditional credit history, lack of knowledge around credit management, insufficient enforcement and oversight of fair lending laws, and reliance on outdated technology. These credit-related barriers were surfaced by internal HUD staff and subject matter experts during HUD's Equity Assessment (per EO 13985). HUD wants to test known barriers, discover any unknown barriers individuals face, and gain deeper insight into how these barriers impact the opportunity to own a home. Data gathered during conversations with individual members of the public and HUD's partner agencies will be used to inform what actions HUD might take to better support fair and impartial opportunities for homeownership. Insights and findings from this effort will also contribute to the Equity Action Plan that HUD submits to OMB per Executive Order 13985. Key learnings may be used to produce design artifacts such as user personas or journey maps that, in turn, will serve to inform decision-making for general service improvement and program management purposes.

**TYPE OF ACTIVITY:** (Check one)

- Customer Research (Interview, Focus Groups)
- Customer Feedback Survey
- User Testing

**ACTIVITY DETAILS**

1. How will you collect the information? (Check all that apply)

- Web-based or other forms of Social Media
- Telephone
- In-person
- Mail
- Other, Explain

2. Who will you collect the information from?

*Explain who will be interviewed and why the group is appropriate for the Federal program / service to connect with. Please*

*provide a description of how you plan to identify your potential group of respondents and if only a sample will be solicited for feedback, how you will select them (e.g., anyone who provided an email address to a call center rep, a representative sample of Veterans who received outpatient services in May 2019, do you have a list of customers to reach out to (e.g., a CRM database that has the contact information, intercept interviews at a particular field office?)*

This effort has grown out of HUD's Equity Assessment (per EO 13985) to identify barriers to homeownership experienced by underserved communities. In order to test hypotheses around credit-related barriers to homeownership, HUD is seeking to speak directly to individuals who meet the following criteria:

- Black or Hispanic/Latina/Latino
- Meet one of these homeownership situations:
  - Do not see homebuying as an option
  - Not a homeowner, but may buy a home in the future
  - Not a homeowner, but actively looking to buy a home
  - Tried to buy a home in the last five years but was not able to
  - Currently own a home that was bought in the last five years
- 18 years of age or older

HUD will work closely with partner organizations (Public Housing Agencies, Housing Counseling Agencies, nonprofits) to identify individuals who may be interested in participating in this effort. After partner organizations have been given an overview of the research and are provided with necessary outreach templates, they can help recruit individuals via email or social media. Interested individuals will take a screener to ensure they meet the above criteria. Eligible participants who submit the screener will be contacted by HUD's research team to schedule a one-on-one interview or focus group.

3. How will you ask a respondent to provide this information? *(e.g., after an application is submitted online, the final screen will present the opportunity to provide feedback by presenting a link to a feedback form / an actual feedback form)*

An online screener will be used to collect basic information necessary to confirm respondent's eligibility and schedule conversations (age, race and ethnicity, homeownership situation/past homeownership experience, credit, preferred spoken language, and contact information). After signing up for a conversation, a consent form will be sent to participants to consent to online. Participants will also be given the opportunity to consent verbally at the beginning of our conversation with them. Participants will also be sent a voluntary and anonymous demographics online form. This demographic form will collect additional information to ensure that we speak to people from a diverse range of backgrounds (e.g., gender, location – i.e. state, where they live – i.e., rural/urban/suburbs, age range, education, race/ethnicity, if they have children and how many, income range, experience with financial education or housing counseling, active duty/veteran status, disability status, LGBTQ status, student loan status, debt from medical bills status, past incarceration status, past bankruptcy status, past experience with homelessness status).

4. What will the activity look like?

*Describe the information collection activity - e.g. what happens when a person agrees to participate? Will facilitators or interviewers be used? What's the format of the interview/focus group? If a survey, describe the overall survey layout/length/other details? If User Testing, what actions will you observe / how will you have respondents interact with a product you need feedback on?*

Information collection activities will include semi-structured one-on-one hour-long conversations and hour-long focus groups. These activities will be led by facilitators from HUD's Customer Experience Transformation Team (including Booz Allen contractors) and HUD's Homeownership Equity Action Team (comprised completely of HUD staff). As appropriate, a HUD interpreter will help facilitate conversations.

It is not the intent to ask participants a standardized set of questions. Instead, participants will engage in a loosely guided conversation with facilitators in which they will be asked to share their lived experiences and opinions related to a set of topics. Specific question phrasing and areas of deeper exploration will be determined on an ad hoc basis by facilitators during the conversation. Facilitators will cover key areas of participant's lived experience to unearth barriers to credit and homeownership (e.g., personal financial context, current living and financial situation, perceptions and knowledge surrounding homebuying, experience with lending professionals, and personal experiences, perceptions and knowledge of building credit and credit scores).

5. Please provide your question list.

*Paste here the questions or prompts presented to participants in your activity. If you have an interview / facilitator guide, that can be attached to the submission and referenced here.*

**Please make sure that all instruments, instructions, and scripts are submitted with the request.**

- Participant recruitment – email/social media (see attached)
- Screener (see attached)
- Informed consent form (see attached)
- Voluntary/anonymous demographics questionnaire (see attached)
- Facilitator/Discussion guide (see attached)

6. When will the activity happen?

*Describe the time frame or number of events that will occur (e.g., We will conduct focus groups on May 13,14,15, We plan to conduct customer intercept interviews over the course of the Summer at the field offices identified in response to #2 based on scheduling logistics concluding by Sept. 10<sup>th</sup>, or "This survey will remain on our website in alignment with the timing of the overall clearance.")*

These activities will take place from October-December of 2021.

7. Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants?  
 Yes  No  
 If Yes, describe:

**BURDEN HOURS**

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Screener	150	5 minutes	12.5
Demographics	50	5 minutes	4.17
Consent	50	5 minutes	4.17
Interview/Focus Group Participants	50	1 hr	50.00
<b>Totals</b>	<b>300</b>	1.25 hrs	<b>70.84</b>

**CERTIFICATION:**

I certify the following to be true:

1. The collections are voluntary;
2. The collections are low-burden for respondents (based on considerations of total burden hours or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
3. The collections are non-controversial and do not raise issues of concern to other Federal agencies;
4. Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future;
5. Personally identifiable information (PII) is collected only to the extent necessary and is not retained;
6. Information gathered is intended to be used for general service improvement and program management purposes
7. Upon agreement between OMB and the agency aggregated data may be released as part of A-11, Section 280 requirements only on performance.gov. Summaries of customer research and user testing activities may be included in public-facing customer journey maps.
8. Additional release of data will be coordinated with OMB.

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**All instruments used to collect information must include:  
 OMB Control No. 2511-0001  
 Expiration Date: 09/30/2024**

**HELP SHEET**  
**(OMB Control Number: 2511-0001)**

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**TITLE OF INFORMATION COLLECTION:** Provide the name of the collection that is the subject of the request. (e.g. Comment card for soliciting feedback on xxxx)

**PURPOSE:** Provide a brief description of the purpose of this collection and how it will be used. If this is part of a larger study or effort, please include this in your explanation.

**TYPE OF COLLECTION:** Check one box. If you are requesting approval of other instruments under the generic, you must complete a form for each instrument.

**CERTIFICATION:** Please read the certification carefully. If you incorrectly certify, the collection will be returned as improperly submitted or it will be disapproved.

**Personally Identifiable Information:** Agencies should only collect PII to the extent necessary, and they should only retain PII for the period of time that is necessary to achieve a specific objective.

**BURDEN HOURS:**

**Category of Respondents:** Identify who you expect the respondents to be in terms of the following categories: (1) Individuals or Households; (2) Private Sector; (3) State, local, or tribal governments; or (4) Federal Government. Only one type of respondent can be selected per row.

**No. of Respondents:** Provide an estimate of the Number of respondents.

**Participation Time:** Provide an estimate of the amount of time required for a respondent to participate (e.g. fill out a survey or participate in a focus group)

**Burden:** Provide the Annual burden hours: Multiply the Number of responses and the participation time and divide by 60.