

Supporting Statement for Paperwork Reduction Act Submissions
Housing Discrimination Complaint
(OMB# 2529-0011)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The “Housing Discrimination Complaint” previously titled the “Report Housing Discrimination” Form (HUD-903) is necessary for the collection of pertinent information from persons or entities who wish to file housing discrimination complaints with HUD under §810(a) of the Fair Housing Act of 1968 (Act), as amended [42 U.S.C. §3601 et seq. and 24 C.F.R. Part 103, Subparts A and B]. The current form expired on September 30, 2025. HUD’s Office of Fair Housing and Equal Opportunity (FHEO) staff uses collected information to verify that the person or entity has standing as an aggrieved person to file a complaint under the Act; that the respondent is covered by the requirements of the Act; that the subject dwelling is covered by the requirements of the Act; that the alleged discriminatory activity is prohibited under the Act (subject matter jurisdiction); and that the alleged discriminatory activity occurred within the Act’s one-year statute of limitations for filing a complaint with HUD. Information is also collected to provide statutorily required notice to those accused of an unfair housing practice of the complaint against them. Effective as of October 1, 2022, FHEO was authorized to file and investigate complaints alleging violations of the 2022 reauthorization of the *Violence Against Women Act* (VAWA) [34 U.S.C. §§12491 - 12495]. FHEO is requesting to update the form to reflect current statutory authority, to simplify the housing discrimination intake process, and reduce the burden on the public and HUD employees.

The information collected is used by FHEO staff to contact aggrieved persons; verify jurisdiction under the Fair Housing Act; notify respondents of alleged violations; and develop, perfect, and investigate complaints. It is also used to establish jurisdiction under Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d–2000d-7); Section 504 of the Rehabilitation Act (29 U.S.C. § 794); Title II of the Americans with Disabilities Act (42 U.S.C. §§ 12131–12134); Section 109 of the Housing and Community Development Act (42 U.S.C. § 5309); the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101–6107); Title IX (20 U.S.C. §§ 1681–83, 85-88); and the Architectural Barriers Act (42 U.S.C. §§ 4151 et seq.).

Provided here are links to the Fair Housing Act (42 U.S.C. §3601 et seq.) at <https://www.law.cornell.edu/uscode/text/42/chapter-45> and HUD's implementing regulation at <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-I/part-100>. Both authorize this collection (42 U.S.C. §3610; 24 C.F.R. Part 103, Subpart B).

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This submission is a reinstatement with change of the Housing Discrimination Complaint form (HUD-903). HUD/FHEO uses the information as the primary data source for the HUD Enforcement Management System (HEMS), where staff conduct intake and assessment, generate jurisdictional complaints, store evidence, document conciliation efforts under § 810(b), produce investigative reports and determinations under §§ 810(b) and 810(g), and prepare electronic case files for supervisory, OGC, and Headquarters review. The information is also used to contact aggrieved persons, notify respondents, and conduct investigations under the Fair Housing Act and other Federal civil rights authorities.

The revised Form introduces updates, including the addition of Violence Against Women Act (VAWA) protections—covering survivors of domestic violence, dating violence, sexual assault, and stalking—as new bases for filing housing discrimination complaints, along with explicit protections against retaliation for exercising VAWA rights. The new version incorporates clearer question prompts, expanded respondent and witness fields, updated submission instructions directing complaints to a central HUD office, and a statement clarifying that HUD will use English as the official language for all business and services. Additionally, the revised Form adds a signature field that will reduce processing time by getting a signature upfront. The changes make the process clearer to the user and improve the speed by which the form can be processed by HUD/FHEO staff.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

An online version of the Form is available at <https://www.hud.gov>, where it may be completed, saved, and submitted electronically to HUD. Approximately 98% of

submissions in FY2025 were received electronically. Because nearly all respondents already use the online Form, HUD does not anticipate a measurable reduction in burden from this revision. The updated Form maintains the efficiency of electronic submission while improving clarity and usability.

Respondents unable to complete the electronic version of the form may print and mail a copy to HUD at:

United States Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
Attention: Office of Enforcement
451 7th St SW, Washington, DC 20410

They may also respond via toll-free call by dialing [1-800-669-9777](tel:1-800-669-9777).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

HUD is the only Federal agency authorized to administratively enforce the Fair Housing Act and VAWA. The information required for complaint intake and jurisdictional analysis cannot be obtained from any other source. Because this information cannot be duplicated or substituted, no duplication exists.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

This collection does not affect small businesses or other small entities. As explained in Item 4, only aggrieved persons can supply the information required for complaint intake, and no small entity is positioned to provide or process such information. Therefore, no burden is imposed on small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If HUD did not collect this information, or collected it less frequently, aggrieved persons would be unable to file jurisdictional housing discrimination complaints, and HUD would be unable to fulfill its statutory obligations under the Fair Housing Act and other civil rights laws.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: **ANSWER ALL BULLETS INDIVIDUALLY**

- requiring respondents to report information to the agency more than quarterly;

Respondents are not required to report information more than quarterly.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Respondents are not required to prepare written responses in fewer than 30 days.

- requiring respondents to submit more than an original and two copies of any document;

Respondents are not required to submit more than an original and two copies.

- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

Respondents are not required to retain records for more than three years.

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

The collection is not a statistical survey.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

No statistical data classification is used.

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

No unsupported confidentiality pledges are made; Privacy Act protections apply.

- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Respondents are not required to submit proprietary or trade-secret information.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
 - Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
 - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

HUD published FR-7095-N-01 60-Day Notice of Proposed Information Collection: Comment Request Housing Discrimination Complaint Form HUD-903 in the Federal Register on April 9, 2026 soliciting public comments on this collection. HUD will respond to all comments it receives. The comment period ends on June 8, 2026.

Across all comments received, HUD's response affirms that HUD-903 is intentionally scoped to collect the essential facts of alleged housing discrimination within FHEO's statutory purview, so intake staff can determine jurisdiction and route cases appropriately. Proposed additions that would ask filers to identify territorial/block-grant funding, label systemic/program-wide violations, assert legal conclusions about local law or constitutional claims, or add a checkbox for HUD-funded employment/contracting are not adopted. Each would either (a) ask pro-se filers to provide specialized or legal determinations that HUD—not the filer—must make, or (b) expand the form beyond its housing-discrimination scope, increasing confusion and extraneous submissions. HUD also clarifies that every HUD-903 submission is reviewed; funding does not drive prioritization. Triage and escalation are based on the substance and urgency of the alleged housing discrimination, with routing handled through existing location fields, intake guidance, and internal dashboards—not additional public form fields. Suggestions about closure notices/appeal rights and staff training are recognized as operational matters; any refinements will be addressed through internal process rather than by changing the public form.

For comments outside the information collection's purpose—such as the Article 12 constitutional analysis and the PRAC letter on pandemic-relief funds, retaliation, and

whistleblower requests—HUD notes these are beyond the scope of HUD-903. Filers may still report housing-related facts through the form's narrative; HUD will evaluate those facts under applicable federal housing laws and coordinate or refer through established channels when issues arise outside FHEO's authority. Conversely, the resident account alleging denial of reasonable accommodations and uneven enforcement reflects the kind of housing-discrimination facts HUD-903 is designed to capture; it is not a comment on the form itself, and no change to HUD-903 is warranted. Overall, HUD maintains a concise, user-friendly form that stays focused on the facts needed to open and route housing-discrimination inquiries, while relying on internal processes to address territorial nuances, systemic patterns, and cross-agency coordination where appropriate.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

HUD provides no payment, gift, or remuneration to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Information collected is protected under the Privacy Act. HUD's Privacy Act Statement applies to all data collected. No additional assurances beyond statutory requirements are provided. SYSTEM OF RECORDS NO.: HUD/FHEO-

02 <https://www.govinfo.gov/content/pkg/FR-2023-12-14/pdf/2023-27443.pdf> published December 14th, 2023

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The Form includes items relating to protected characteristics (race, color, religion, sex, disability, familial status, national origin) because they are essential to establishing jurisdiction under the Fair Housing Act. This information is necessary for FHEO to access the allegation of discrimination for jurisdiction. By submitting this information, the submitter consents to HUD's use of the data for investigation and enforcement.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;
- If this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in chart below; and
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

HUD estimates based on the number of HUD-903 submittals received in FY 2025 that it will receive 51,442 respondents annually, each submitting the Form once. Approximate completion time is 0.75 hours, resulting in 38,581.5 annual burden hours. Because submitters span the entire population and across professions HUD utilizes the May 2025 cost burden of \$24.51 based on the national hourly median wages across all occupations. There is no recordkeeping burden.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
903	51,442	1	1	0.75	38,581.50	\$24.51	\$945,632.57

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day

pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

HUD does not provide postage-paid mailers for this information collection. Accordingly, persons who choose to submit the HUD-903 Form to HUD by mail must pay the prevailing cost of First-Class Postage. As of the date of this submission, the annualized cost burden per person, based on a one-time submission of this Form, is seventy-eight cents (\$0.78) per person. Aggrieved persons also may submit the Form to HUD electronically via the Internet. There are no additional annualized cost burdens to aggrieved persons or record keepers resulting from this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

HUD estimates that HUD/FHEO Complaint Intake staff takes approximately 30 minutes (1/2 hour) to review each completed HUD-903 Form. The average grade level of a HUD/FHEO Complaint Intake Analyst is GS-12/7. In FY 2026, the base hourly rate at the GS-12/7 level was \$43.97.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
903	51,442	1	1	.5	25,721	43.97	1,130,952.37

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

The information collected is used by FHEO staff to contact aggrieved persons; verify jurisdiction under the Fair Housing Act; notify respondents of alleged violations; and develop, perfect, and investigate complaints. It is also used to establish jurisdiction

under Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d–2000d-7); Section 504 of the Rehabilitation Act (29 U.S.C. § 794); Title II of the Americans with Disabilities Act (42 U.S.C. §§ 12131–12134); Section 109 of the Housing and Community Development Act (42 U.S.C. § 5309); the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101–6107); Title IX (20 U.S.C. §§ 1681–83, 85-88); and the Architectural Barriers Act (42 U.S.C. §§ 4151 et seq.).

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Any adjustments reflect updated submission volumes and current postage costs; no program changes affect the burden estimate.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

HUD does not publish the results of individual complaints collected through the Form.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

HUD will display the OMB control number and expiration date on the Form.

18. Explain each exception to the certification statement.

HUD requests no exceptions to the certification requirements of the Paperwork Reduction Act.