

# Equity Action Plan Digest: Department of Housing and Urban Development

*Summarized by Travis Reginal*

This is one in a series of Urban Institute digests summarizing federal agencies', subagencies', and commissions' 2022 equity action plans, which were released in response to the Biden administration's January 2021 executive order, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. The Department of Housing and Urban Development's equity action plan is available at <https://www.hud.gov/sites/dfiles/PA/documents/HUDEquity508compliant.pdf> (PDF).

## Overview

<b>What problem is the agency trying to solve?</b>	HUD is “working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform to improve quality of life; build inclusive and sustainable communities free from discrimination; and transform the way HUD does business” (p. 2)
<b>Priority groups</b>	Black people; Latino people; lesbian, gay, bisexual, transgender, and queer people and people with other gender/sexual identities; Native Americans
<b>Historic harm mentioned?</b>	Yes
<b>Partners in implementation</b>	Local HUD partners/grantees, Small Business Administration
<b>Equity defined as</b>	“The U.S. Department of Housing and Urban Development’s (HUD) mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Meeting the aspiration of this goal requires that HUD prioritizes people in communities otherwise underserved by federal programs” (p. 2)

## Pillars and Principles of Equity

<b>Acknowledgement of past harm and present barriers</b>	“Several of HUD’s core programs were implemented and operated for decades in a manner that enabled discriminatory practices against people of color and members of other protected class groups” (p. 2)
<b>Impact goals</b>	Outreach to underserved communities, including people with disabilities; lesbian, gay, bisexual, transgender, and queer people and people with other gender/sexual identities; business owners; and American Indians (p. 4); reduce entries into homelessness (p. 16); ethical data collection (p. 16)
<b>Actions and activities</b>	Created a knowledge collaborative on race, diversity, equity, and inclusion in its research division (p. 4); created the Diversity and Office Improvements Committee (p. 4); created a rotation program so staff members who do not normally engage in this work can spend time working on the equity agenda (p. 5); increasing engagement with nontraditional lenders and community-based institutions (p. 12)
<b>Accountability measures and approaches</b>	Annual report to Congress on the financial status of the Federal Housing Administration’s Mutual Mortgage Insurance Fund, which contains data on the race of borrowers (p. 14); the FY2022–26 strategic plan, which contains specific performance indicators across programs and is aligned with HUD’s overall equity objectives (p. 14); racial equity analysis tool for continuums of care (p. 16)

**Note:** For the rubric we used to evaluate these components of the equity action plans, see the appendix to the Urban Institute's 2023 brief “Pathways to Equity at Scale: An Analysis of the 2022 Federal Equity Action Plans and Recommendations for 2023 Plans,” available at [https://www.urban.org/sites/default/files/2023-03/Pathways%20to%20Equity%20at%20Scale%20Appendix\\_0.pdf](https://www.urban.org/sites/default/files/2023-03/Pathways%20to%20Equity%20at%20Scale%20Appendix_0.pdf).

## Types of Equity and Related Activities

<b>Procedural</b> (example: expanding language and translation services; simplifying the vendor application process)	Included equity in notice of funding opportunities and in research priorities (p. 4); increased access to federal procurement system (p. 6); providing support to small businesses to help them write more competitive applications and making funding opportunities for small businesses easy to find (p. 6)
<b>Distributional</b> (example: creating new procurement program)	Launched a housing counseling grant program for historically Black colleges and universities and minority-serving institutions (p. 4); initiated Coordination Entry Equity Initiative pilot for people of color (p. 4); providing culturally responsive housing counseling to underserved populations (p. 13); will offer direct technical assistance to tribes and to Tribally Designated Housing Entities regarding their continuums of care to address homelessness (p. 16); per HUD's agency priority goals, the agency is developing a toolkit for Public Housing Authorities on launching a mobility program and implementing Justice40 pilot to address lead contamination
<b>Structural</b> (example: policy change via proposing legislation related to an equity goal; changing organizational functions)	Expanding the financing of affordable housing types like manufactured housing through updates to the Title I program (p. 3); creating a knowledge collaborative on race, diversity, equity, and inclusion in research (p. 4); creating a rotation program to allow career staff to engage with the equity agenda (p. 5); strengthening policies aimed at preventing discrimination in housing (p. 10); will diversify Office of Fair Housing and Equal Opportunity staff (p. 10)

## Key Metrics to Measure Progress on Equity

- number of Fair Housing Act complaints received, processed, and closed (p. 10)
- number of organizations funded by the Fair Housing Initiative Program and Fair Housing Assistance Program working at the state and local levels (p. 10)
- number of cases referred by Fair Housing Initiative Program organizations (p. 10)
- number of cases processed by Fair Housing Assistance Program organizations (p. 10)
- number of Fair Housing Initiative Program / Fair Housing Assistance Program practitioners attending National Fair Housing Training Academy trainings (p. 10)
- HUD's capacity to address housing discrimination (p. 10)
- increased availability and utilization of small-dollar mortgage loans (p. 13)
- homeownership rates by race (p. 14)
- exits from homelessness (p.16)

## Looking Ahead: Key Reflections for Plan Implementation

Where is the agency set up for success?	Acknowledgement of past harms; internal commitment to equity; updated agency priority goals identify outcomes and targets of interest including the Housing Choice Voucher utilization rate and goal of 20,000 housing units becoming healthy and lead-safe
Areas for future investment and growth	Focus on outcomes in addition to process and usage accomplishments; include affected communities in the design and evaluation of the programs and policies; focus more on returning citizens; develop a robust implementation timeline; resource growth and development