



We Listened – Centering Identity Through Changes in Data Collection

VERSION 1
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Background

HUD invited you – people with lived homeless experience, community partners, homeless service providers, civic leaders, and any who wanted to contribute – to join them in making these critical improvements to the Homeless Management Information Systems (HMIS) demographic data standards. With the support, expertise, and insight of people with lived experience of homelessness, Continuum of Care (CoC) leadership and providers, researchers, advocates, and HUD TA providers, HUD engaged in an intentional evaluation and redesign of race, ethnicity, and gender data elements. Communities provided thoughtful feedback through a variety of avenues including HUD’s Ask A Question (AAQ) help desk, focus groups, listening sessions, comments in webinars, surveys, and submissions of formal documents created through local system feedback requests. You submitted 353 comments on proposed changes. This resource documents lessons learned from that opportunity and the changes that were made as a result of your feedback.

You can find the FY2022 version of the gender, race, and ethnicity data elements on the [FY2022 Data Standards](#) page. You can also find detailed information on the process to define initially proposed changes on the [HUD Exchange website](#).

General Themes

Those specifically self-identifying with lived experience of homelessness agreed that this feedback solicitation is a positive and welcomed engagement step. More broadly, respondents agreed it is important that all parties understand why this information is collected and that this may require additional training resources. They emphasized the need for communication in advance of changes, creating a sandbox/test site ahead of the change date, and laying out clear mapping instructions.

Across all data standards feedback, people suggested that the response category “Client refused” be replaced with something that does not imply combativeness or non-compliance. In line with these suggestions, HUD changed “Client refused” to “Client prefers not to answer.”

Gender Identity

Based on 95 items of feedback from 48 people in 23 states

Proposed Changes

The proposed change to the gender element divided the existing gender question into two parts. The first was about gender identity and the second allowed a person to identify if they have had a transgender experience. The first part of the question asked people to choose as many identities as they feel represent their gender, and a single response was required for the second part.

Feedback Summary

Your feedback acknowledged that it is difficult to create a list that encompasses all gender identities. Responses were largely supportive of the change to “woman/girl” and “man/boy” language rather than “female” and “male,” noting the male and female responses are sex assignments, whereas man and woman responses are gender identities. You also expressed support for the inclusion of “non-binary,” as the existing “A gender other than singularly female or male” response reinforces the gender binary. Commenters also suggested collecting pronouns and/or sexual orientation along with gender identity.

Most commenters supported moving “Transgender Experience” to its own field, but some expressed confusion over why these items would be separated while race and ethnicity were combined. There were also serious concerns raised around safety. This was a particular concern in projects where it is difficult to conduct intakes in a private space. There was also fear that this additional question may serve as a disincentive for clients to access services.

Among respondents who identified as transgender, a common theme was that the phrase “Transgender Experience” was not a common title for the proposed element, particularly as use of the term “experience” may imply that the question is referring to an occurrence expected to pass, rather than a part of one’s identity. Others noted that not all transgender people center this part of their identity, and may prefer to identify simply as a man or a woman. This is particularly important in situations where it may be safer for the person receiving services to avoid disclosing this part of their identity.

Final Changes

- The FY2024 Data Standards retain “Transgender” in a single “Gender” element, rather than changing it into a two-part question.
- “Female” and “Male” were replaced with “Woman (girl if child)” and “Man (boy if child),” respectively.
- The response beginning with “A gender other that singularly male or female” has been split into “Culturally Specific Identity (e.g., Two-Spirit),” “Non-Binary,” and “Different Identity.”
- Clients selecting “Different Identity” have the option of providing an open-ended response.

Race and Ethnicity

Based on 86 items of feedback from 41 people in 22 states

Proposed Changes

The [proposed change](#) for the FY2024 Data Standards combined the race and ethnicity data elements into a single element, while maintaining the ability to select multiple responses. It also included a follow-up open text field to allow people to use different language to identify themselves.

Feedback Summary

Your most common type of feedback on the proposed changes to the race and ethnicity elements was to add more options. Additionally, you also suggested adding an element for Tribal Affiliation and further disaggregating both the “White” and “Asian” categories.

Your feedback on combining the race and ethnicity fields was mixed, with some concerns about conflating these elements. Additional suggestions included changing “Latinx” to “Latine” to be culturally appropriate while maintaining gender neutrality, and “American Indian” to “Native American.”

You asked several questions about how the combined race and ethnicity fields would appear in reports and whether the open text field would be reported on. Additionally, with the ability to select multiple options, you asked how this would be captured in reports such as HUD’s Continuum of Care Program Annual Performance Report (APR) and how that could then be used to qualitatively analyze homeless response systems. You also requested that the race and ethnicity fields align with other data sources such as the Census.

Overall, your feedback was supportive of these changes with the comments suggesting additional disaggregation and ensuring that there would not be negative reporting implications.

Final Changes

- The FY2024 Data Standards combine race and ethnicity into a single element “Race and Ethnicity,” while allowing multiple response selections.
- “Hispanic/Latin(a)(o)(x)” has been renamed “Hispanic/Latina/e/o” within the combined element.
- “Middle Eastern or North African” has been added.
- This element includes a follow-up open text field to allow people to use different language to identify themselves.

Preferred Language

Based on 56 items of feedback from 25 people in 18 states

Proposed Changes

This was a proposed additional data element, rather than a modification to an existing one. The proposal was a list of the seven most common languages in the United States along with an open-ended field for languages not covered in this list. People would be allowed to select multiple languages.

Feedback Summary

Most of your feedback offered additional languages for consideration or requested clarification on how this data element would be implemented at the local level. The most requested additional response was American Sign Language (ASL). Other suggested response categories were community-specific. Some of you noted the need to ensure consistent closed captioning in the development and delivery of webinars and widespread sharing of transcription and translation services when needed.

Some of your feedback focused on understanding how community-specific languages should be operationalized. Specifically, respondents noted that collecting preferred language alone does not determine if additional translation or accessibility services are needed to support the person. In addition, you noted that in communities with large rates of new Americans or people with preferred non-English languages, many service providers already adapted widespread use of language banks and translation services to appropriately serve their clientele, so the introduction of this data element is not adding value in service delivery but is instead increasing the data collection and entry burden in HMIS.

Some of you questioned the data's use and how it would be reported. Some of you also noted that while the Preferred Language data element in its proposed form combined Spanish, Chinese, and French languages and dialects in an imprecise and potentially insensitive way, particularly where colonial histories may be present (French and French Creole was provided as an example).

Final Data Element

- The FY2024 Data Standards shifted the proposed data element from "Preferred Language" to "Translation Assistance Needed" to support the action orientation to the data collected. This emphasizes that the intention is to understand, at both the local and national levels, what translation services are most needed in the homeless response system to best support people accessing services.
- An "[HMIS C4 Translation Assistance Needed Supplement](#)" has been developed to support the consistent numbering of languages across HMIS implementations so that it is possible to understand this data at a national level, in addition to local, regional, and state levels.

- For each HMIS implementation, HMIS Leads/System Administrators will work with providers within the local communities to select up to 20 languages from the supplemental list to populate the list of options available in the system.

Conclusion

Everything we do – from initial intake to data collection to housing people – impacts our ability to best serve people experiencing homelessness. To do this in an effective and equitable way, we must authentically engage and meaningfully incorporate the voices of those we serve to help us shape how we do business. Additionally, HUD, in partnership with people with lived experience of homelessness, CoC leadership and providers, researchers, advocates, and TA providers have provided [additional resources](#) that focus on trauma-informed and client-centered data collection practices to ensure people remain the primary focus of our data collection practices. Your efforts to include people with lived experience of homelessness in this process and to provide insights will make our collective effort better. Thank you for helping make our data collection more person-centered and trauma-informed.

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