

JUSTICE IN AGING

FIGHTING SENIOR POVERTY THROUGH LAW

December 23, 2022

Submitted via HUD Exchange AAQ Portal

Office of Community Planning and Development
US Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

RE: Proposed Changes to the HMIS Race, Ethnicity, and Gender Identity Data Elements

Justice in Aging appreciates the opportunity to provide feedback on proposed changes to the HMIS race, ethnicity, and gender identity data elements. Justice in Aging is a national advocacy organization with the mission of improving the lives of low-income older adults. We use the power of law to fight senior poverty by securing access to affordable housing, health care, economic security, and the courts for older adults with limited resources. We focus on the needs of low-income populations that have traditionally lacked legal protections such as women, people of color, LGBTQ+ individuals, and people with limited English proficiency.

We appreciate HUD's commitment to creating more client-centered intake processes and addressing inequities in the homeless response system. And in accordance with the Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,¹ we encourage HUD to identify the best methods to assess and measure equitable impacts using disaggregated data on race, ethnicity, gender identity, and other key demographic factors.

Our comments on the revised HMIS data elements are below, along with additional recommendations on improving available data about older adults, who are the fastest growing age group among people experiencing homelessness. Researchers estimate that the number of older adults who are homeless will triple over the next decade, making it critical for HUD to prioritize collecting and analyzing high-quality data about this population.²

¹ EO 13985 (Jan. 20, 2021), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

² Dennis Culhane et al., AISP, *The Emerging Crisis of Aged Homelessness: Could Housing Solutions be Funded by Avoidance of Excess Shelter, Emergency Room and Nursing Home Costs?* (2019), <https://www.aisp.upenn.edu/aginghomelessness/>.

Race and Ethnicity Data Element

We support the revised, combined Race and Ethnicity data element that adds Middle Eastern and North African populations, as well as the open-ended follow up question that allows people to include additional details or language to identify themselves.

The content of intake questions is important, but so too is the way in which those questions are asked by intake staff. HUD should ensure that individuals conducting intake interviews are properly trained and have access to resources on asking demographic questions. The HUD guidance on “Client-Centered Approach to Recognizing Race and Ethnicity Identities in Data Collection” contains references to appropriate standards—particularly on trauma-informed practices, language access, and self-identification of the interviewer—but HUD should also provide and require trainings on these issues. Currently, HMIS-related trainings tend to focus on technical details and requirements, but we recommend that HUD also conduct trainings on best practices for client-centered intake.

Preferred Language Data Element

We also support the new Preferred Language data element, which asks clients about their preferred language among the list of most common languages in the US and includes an open-ended follow-up question for different languages. HUD has noted that this data element was created because a client’s preferred language is not only an important part of cultural identity, but also key for ensuring language access. However, a client’s language preference alone does not convey whether the client needs language assistance services. To ensure equitable access to services for clients with limited English proficiency, this data element should also include follow-up questions to capture whether a client needs an interpreter, written translations, or both.³

Further, we urge HUD to clarify in trainings and the next HMIS Data Standards Manual that intake staff should also use the open-ended follow-up question to note communication needs arising from a disability, such as the need for sign language interpretation or accommodations for blindness or low vision.

³ HUD should also consider requiring service providers to track whether language assistance services were actually used and how they were delivered (e.g. via bilingual staff, telephonic interpretation, etc.). Anecdotally, we know that many limited English proficient clients experiencing homelessness do not receive the language assistance services they are legally entitled to from service providers. As a result, these clients are discouraged from engaging with the homeless services system and accessing vital resources. See, e.g., Melissa Chinchilla, UCLA Latino Policy & Politics Initiative, *Stemming the Rise of Latino Homelessness: Lessons from Los Angeles County* (2019), <https://latino.ucla.edu/wp-content/uploads/2019/01/Stemming-the-Rise-of-Latino-Homelessness-2-1.pdf> and Julia Terruso, et al., Philadelphia Inquirer, *Why So Few of Philly’s Homeless Latinos Use Shelters, Get City Services* (January 2019), available at <https://whyy.org/articles/why-so-few-of-phillys-homeless-latinos-use-shelters-get-city-services/>.

Gender Data Element

We support the changes to the Gender data element that include more options, the opportunity to select multiple options or different identities in an open-ended follow-up question, and a separate field on transgender experience. Adding another field or follow-up question about pronouns, however, would improve this element and help ensure that service providers use the correct pronoun that aligns with a client’s gender identity. HUD’s guidance on “Client-Centered Approach to Recognizing Gender identities in Data Collection” already points out the importance of asking for pronouns as an equity intervention.

Because so many LGBTQ+ older adults have experienced a lifetime of stigma and discrimination and may be wary of service providers, staff conducting intake should be prepared to foster a safe and affirming environment. We encourage HUD to consider updating the above guidance to refer to resources trusted by impacted communities. For example, the National Resource Center on LGBT Aging’s guide, “Inclusive Questions for Older Adults,”⁴ contains information for service providers on intake best practices, such as the importance of explaining an agency’s policies on confidentiality and the sharing of client’s personal information, including information on gender identity.

Additional Recommendations for Data on Older Adults

Rates of homelessness are increasing rapidly among older adults, but current HUD practices on collecting and reporting data about this population limit our understanding of the full scope of the problem. As acknowledged by the recently released federal strategic plan on homelessness, older adults experiencing homelessness have historically been undercounted.⁵ We support the plan’s goal of identifying more effective ways of generating data on older adults and other marginalized groups, and we urge HUD to consider as part of that effort the importance of reporting disaggregated data. While Part 2 of the Annual Homeless Assessment Report includes some information about older adults using age data from HMIS, the AHAR generally provides aggregate data, which does not always allow for analysis based on intersecting identities. HUD should publish disaggregated data and prioritize intersectional analysis, as people with multiple marginalized identities often experience compounded barriers to accessing services and securing housing. For example, older adults are more likely to experience homelessness upon release from incarceration than younger individuals, with Black

⁴ National Resource Center on LGBT Aging, *Inclusive Questions for Older Adults – A Practical Guide to Collecting Data on Sexual Orientation and Gender Identity*, (2016), https://www.lgbtagingcenter.org/resources/pdfs/Sage_CollDataGuidebook2016.pdf.

⁵ United States Interagency Council on Homelessness, *All In: The Federal Strategic Plan to Prevent and End Homelessness*, (December 2022), available at <https://www.usich.gov/fsp>.

and Hispanic individuals facing a higher risk of homelessness than their White counterparts.⁶ Homelessness in this context also places older adults of color at higher risks of reincarceration, creates additional obstacles in accessing other social and income supports, and puts older adults with complex health needs in peril.⁷

Finally, we urge HUD to collect and report more granular data about older adults through the Point-in-Time Count and the AHAR Part 1 as well. The limited age categories (under 18, 18-24, and over 24) that are reported in the AHAR Part 1 and accompanying datasets do not distinguish older adults from much younger individuals, which obscures the actual extent of older adult homelessness. Specific sections on older adults in the AHAR, similar to the sections on youth experiencing homelessness, would also help highlight data and trends that are essential for improving service delivery and informing policy solutions for older adults. As homelessness systems increasingly serve seniors, the urgency of needing data about older adults will only grow.

Conclusion

Thank you for your consideration of Justice in Aging's comments. If you have any questions, please contact Sahar Takshi at stakshi@justiceinaging.org or Jennifer Kye at jkye@justiceinaging.org.

Sincerely,

Tracey Gronniger
Managing Director

⁶ Lucius Couloute, Prison Policy Initiative, *Nowhere to Go: Homelessness Among Formerly Incarcerated People*, (August 2018), <https://www.prisonpolicy.org/reports/housing.html>.

⁷ Justice in Aging, *Reducing Barriers to Reentry for Older Adults Leaving Incarceration*, (May 2022), <https://justiceinaging.org/wp-content/uploads/2022/05/Reducing-Barriers-to-Reentry-for-Older-Adults-Leaving-Incarceration.pdf>.