HUD Guiding Language on Collecting Race, Ethnicity, and Gender Data

Race

When enrolling a client who already has a record in the HMIS, verify that race information is complete and accurate and correct it if it is not.

Staff observations should never be used to collect information on race. Provide all options to every client. Even if staff believes they can guess a client's race, every client must be asked for their self-reported information. No documentation is required to verify a client's response.

"Client doesn't know," "Client refused," and "Data not collected" are explanations for missing race data. None of these three responses are valid in conjunction with any other response.

This data element can be challenging to separate from ethnicity. As one example, some people of Latin American descent often indicate their race is "Hispanic," and would not be referred to in casual conversation or seen in their communities or by themselves as "White" or "Black, African American, or African," as an example. Unless the person is from an original people's group that is indigenous or American Indian, in which case they would select that option, the staff will have to ask follow-up questions to ascertain the best response for Race. Staff may ask something like "do you know if your ancestors were originally from a country like Spain, somewhere in Africa, or are you part of an indigenous group?" The response is tied to where their ancestors came from, not necessarily where they were born or lived during their lifetime.

By the time clients get to Ethnicity, they may have already responded to Race with something like 'Hispanic,' 'Guatemalan,' or 'Latino,' so staff should be able to clearly distinguish between these two data elements and select responses accordingly, even if the answers are provided out of order. Projects are cautioned against providing a default answer. It is important to ask about all household members' race and identity because it is impossible to tell just based on a person's appearance or name. If the client does not know their race or ethnicity, or refuses to disclose it, use "Client doesn't know" or "Client refused," rather than making an appearance or name-based assumption.

Response Category / Data Type	Descriptions
American Indian, Alaska Native, or	A person having origins to any of the
Indigenous	indigenous peoples of North and South
	America, including Central America.
Asian or Asian American	A person having origins of Asian descent,
	including but not limited to Chinese, Indian,

	Japanese, Korean, Pakistani, Vietnamese, or
	another representative nation/region.
Black, African American, or African	A person having origins to any of the Black
	racial groups of Africa, including Afro-
	Caribbean.
Native Hawaiian or Pacific Islander	A person having origins in any of the
	indigenous peoples of Hawaii, Guam, Samoa,
	or another Pacific Island.
White	A person having origins in any of the original
	peoples of Europe, the Middle East or North
	Africa.
Client doesn't know	"Client doesn't know" should only be selected
	when a client does not know their race(s)
	from among the five listed races. "Client
	doesn't know" should not be used in
	conjunction with any other response.
Client refused	"Client refused" should only be selected when
	a client refuses to identify their race(s) from
	among the five listed races. "Client refused"
	should not be used in conjunction with any
	other response.
Data Not Collected	

Ethnicity

When enrolling a client who already has a record in the HMIS, verify that ethnicity information is complete and accurate and correct it if it is not.

Staff observations should never be used to collect information on Ethnicity. Even if a staff person believes they can guess a client's ethnicity, every client must be asked for their self-reported information. No documentation is required to verify a client's response.

Additional instruction about assisting clients to differentiate between Race and Ethnicity can be found under Race.

Response Category / Data Type	Descriptions
Non-Hispanic/Non-Latin(a)(o)(x)	A person NOT of Central American, Latin
	American, or South American origin, separate
	from race.
Hispanic/Latin(a)(o)(x)	A person of Central American, Latin
	American, or South American origin, separate
	from race
Client doesn't know	Client doesn't know" should only be selected
	when a client does not know their ethnicity
	from among the responses. "Client doesn't

	know" should not be used in conjunction with any other response.
Client refused	"Client refused" should only be selected when a client refuses to identify their ethnicity from among the responses. "Client refused" should not be used in conjunction with any other response.
Data Not Collected	

Gender

Record the self-reported gender of each client served. Gender identity is a person's internal perception of themselves and may not match the sex they were assigned at birth. Gender is asking about gender identity and not sex assigned at birth.

HMIS Users and data entry staff should be sensitive to persons who do not identify as a female, or as a male, or as transgender.

Staff observations should never be used to collect information on gender. Provide all options to every client. Even if staff thinks they can guess a client's gender, every client must be asked for their self-reported information. If they refuse to give it or say they don't know, do not make a selection other than "Client doesn't know" or "Client refused" on the client's behalf. Gender does not have to match legal documents and clients may not be asked about medical history or other information to try to determine the person's gender. Simply asking, "Which of these genders best describes how you identify?" is appropriate and focuses on the person's own internal knowledge of their gender.

If a client does not understand what a particular gender response may mean, the definitions below can be provided. The availability of these options is not intended to indicate that transgender individuals are expected to disclose their status; each response is provided as an option in case an option (or more than one option) are better suited to a client's preferred terminology, needs, or situation. Clients may select as many responses to the Gender field as they would like to, with up to a total of five options possible for a client's preferred identity, need or situation. However, a response of 'Client doesn't know' should not be used interchangeably with the response option 'Questioning.' 'Questioning' is about exploring one's gender identity. 'Client doesn't know' should only be selected when a client does not know their gender from the options available, including 'Questioning.' Additionally, 'Client doesn't know,' 'Client refused,' and 'Data not collected' are not valid in conjunction with any other response.

If a client discloses being transgender, staff should ask if the client prefers to have the HMIS record reflect the client's transgender status. For instance, if a client identifies as a transgender male but they do not want their transgender identity recorded in the HMIS, the staff person would select 'Male' instead of both 'Male' and 'Transgender.'

When enrolling a client who already has a record in the HMIS, verify that gender information is complete and accurate -- and correct it if it is not. Clients may report different gender identities or present different gender expressions at different projects within the same CoC. This may be because their gender identity has changed or because they experience a different sense of safety at different projects. If staff are working with a client who reports a gender identity that differs from the HMIS record, staff should ensure that the client understands and is comfortable with their information being updated across all projects prior to making any changes. Clients decide to which projects they will disclose potentially sensitive information. Project staff should enter the self-reported information as directed by the client.

Response Category / Data Type	Descriptions
Female	Clients who live or identify as female. May be
	used in conjunction with any other response
	to this field except 'Client doesn't know,'
	'Client refused,' and 'Data not collected.'
Male	Clients who live or identify as male. May be
	used in conjunction with any other response
	to this field except 'Client doesn't know,'
	Client refused,' and 'Data not collected.'
A gender that is not singularly 'Female' or	Clients who live or identify as a gender other
'Male' (e.g., non-binary, genderfluid,	than female, a gender other than male, a
agender, culturally specific gender)	gender outside the binary, no gender, more
	than one gender, a culturally specific gender,
	or a gender that changes over time. May be
	used in conjunction with any other response
	to this field except 'Client doesn't know,' 'Client refused,' and 'Data not collected.'
Transgender	Clients who live or identify with a
Transgender	transgender history, experience, or identity.
	May be used in conjunction with any other
	response to this field except 'Client doesn't
	know,' 'Client refused,' and 'Data not
	collected.'
Questioning	Clients who may be unsure, may be
	exploring, or may not relate to or identify
	with a gender identity at this time. Note that
	"Client doesn't Know" is different than
	"Questioning". "Questioning" is about
	exploring one's gender identity. "Client
	doesn't Know" should only be selected when
	a client does not know their gender from the
	five options available. 'Questioning' may be
	used in conjunction with any other response

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	to this field except 'Client doesn't know,'
	'Client refused,' and 'Data not collected.'
Client doesn't know	'Client doesn't know' should only be selected
	when a client does not know their gender and
	should not be used interchangeably with the
	response option 'Questioning.' 'Client doesn't
	know' should not be used in conjunction with
	any other response to this field.
Client refused	'Client refused' should only be selected when
	a client refuses to identify their gender. 'Client
	refused' should not be used in conjunction
	with any other response to this field
Data not collected	'Data not collected' should only be selected
	when the response to the field "Gender" was
	not collected. 'Data not collected' should not
	be used in conjunction with any other
	response to this field.

Source:

 $\underline{https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Standards-Manual.pdf}$