

**Mayor's Office of Housing and Community Development**  
City and County of San Francisco



**London N. Breed**  
Mayor

**Kate Hartley**  
Director

# Memo

October 5, 2018

To: The Office of the City Administrator  
From: The Mayor's Office of Housing and Community Development  
Re: Compliance Plan and Report on the Collection of Sexual Orientation and Gender Identity

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Beginning July 1, 2017, the Mayor's Office Housing and Community Development (MOHCD) revised its guidelines on the collection of information on sexual orientation and gender identity (SOGI) to comply with Ordinance 159-16 (Ordinance). Passed in July 2016, the Ordinance amended the City's Administrative Code to require covered City departments and contractors that provide health care and social services to collect and analyze SOGI data on the clients they serve. The Ordinance identified the Mayor's Office of Housing and Community Development (MOHCD) as one of the covered departments. This memo fulfills the requirements of section 104.8 of the Administrative Code and serves as MOHCD's Compliance Plan and Report for the Collection of Sexual Orientation and Gender Identity data. This memo (1) defines the scope and standards of MOHCD's SOGI data collection; (2) describes the revisions MOHCD made to data collection forms, databases, and data storage systems; (3) summarizes MOHCD's instruction to staff, contractors, and grantees; and (4) analyzes gender identity and sexual orientation program data for FY2017-18.

## Scope and Standards for Collecting SOGI Data

Prior to the City's adoption of the Ordinance, MOHCD collected applicant and client SOGI data for a sample of its affordable housing and community development programs. Beginning July 1, 2017, MOHCD expanded its SOGI data collection to include most applicant and client-based programs and services, including:

- Community Development Public Services
- Rental and Homeownership Placement
- Downpayment Assistance Loan Programs
- Mortgage Credit Certificates
- Plus Housing
- Annual Monitoring of Multifamily Housing Portfolio
- Certificate of Preference
- Displaced Tenant Housing Preference

In addition to expanding the scope of programs for which MOHCD collected SOGI data, MOHCD modified its data collection standards to be consistent with policies and procedures issued by the Department of Public Health (DPH) in accordance with section 104.3(c)(2) of the Administrative Code. Based on staff and community partner feedback, MOHCD made several modifications to the proposed DPH guidelines. These modifications include adding “Decline to Answer” option for the sex-at-birth question for our community development programs and modifying the order of the responses. Additionally, in May of 2018, after receiving feedback from the Office of Transgender Initiatives as well as from grantees, MOHCD requested a partial waiver to the City Administrator for the requirement to collect information on applicants’ and clients’ sex at birth. This change will be reflected on forms and applications used beginning July 1, 2018. Table 1 provides the three questions and corresponding response options implemented by MOHCD for collecting SOGI data for the program period between July 1, 2017 and June 30, 2018.

**Table 1:** Questions for the Collection of SOGI Applicant and Client Data

<b>Sex and Gender Identity Questions</b>	
<b>What is your gender?</b> (Check <u>one</u> that that best describes your current gender identity)	
<input type="checkbox"/> Female	<input type="checkbox"/> Trans Female
<input type="checkbox"/> Male	<input type="checkbox"/> Trans Male
<input type="checkbox"/> Genderqueer/Gender Non-Binary	<input type="checkbox"/> Not Listed. Pease Specify _____
<b>What was your sex at birth?</b> (Check <u>one</u> that that best describes your current gender identity)	
<input type="checkbox"/> Female	<input type="checkbox"/> Male
	<input type="checkbox"/> Decline to Answer
<b>Sexual Orientation Question</b>	
<b>How do you describe your sexual orientation or sexual identity?</b>	
<input type="checkbox"/> Bisexual	<input type="checkbox"/> Straight/Heterosexual
<input type="checkbox"/> Gay/Lesbian/Same-Gender Loving	<input type="checkbox"/> Not Listed. Pease Specify _____
<input type="checkbox"/> Questioning/Unsure	<input type="checkbox"/> Decline to Answer

### Revisions to Data Collection Forms and Updates to Database and Data Storage Systems

For FY2017-18, MOHCD revised all data collection forms and applications for all programs listed above to match the guidelines presented in Table 1. This includes paper as well as web-based applications. In addition to English, MOHCD translated the SOGI-related questions and answers presented in Table 1 into Chinese, Spanish, and Filipino in collaboration with other covered departments and consultation with subject matter experts. In order to collect applicant and client SOGI data, MOHCD updated all database and storage systems for the program areas already noted.

### Instruction to Staff, Contractors, and Grantees.

MOHCD managed and implemented changes to the SOGI data collection methodology required by the Ordinance through its intradepartmental data-working group, which functions as MOHCD’s standing data-governance meeting. Specific to MOHCD’s Community Development Public Services, MOHCD conducted a series of grantee orientations, where staff presented to grantees SOGI questions and responses. For FY2017-18, MOHCD held these grantee orientations on May 16, 2017 and May 17, 2017. For FY2018-19, MOHCD also held two grantee orientations. These orientations, held on May 22, 2018 and May 24, 2018, included a presentation by Clair Farley, Director of the Office of Transgender Initiatives that presented updated information on SOGI related question and responses. In addition to these general grantee orientations, MOHCD held two SOGI-specific trainings for grantees on June 6, 2018 and June 15, 2018.

Additionally, to assist with general questions about our collection of SOGI related data from community partners, MOHCD created a [page on our website](#) on that explains MOHCD implementation guidelines.

### **Analysis of Sex and Gender Identity and Sexual Orientation Program Data**

The following section presents and analyzes the SOGI data collected for FY2017-18. This period represents the first full year of implementation of the updated SOGI guidelines required by the Ordinance. This analysis includes all program applicants or clients served between July 1, 2017 and June 30, 2018 for five of the eight program for which MOHCD collected SOGI data. The programs included in this analysis are client-based Community Development Public Services; rental and ownership housing placement opportunities; Plus Housing; and the Certificate of Preference and Displaced Tenant Housing Preference programs. SOGI data on the Downpayment Assistance Loan Program is not included in this analysis because the application period for FY2017-18 loans began before MOHCD updated its SOGI data collection guidelines. This report also excludes SOGI data and analysis from MOHCD's annual monitoring of our multifamily housing portfolio, as the reporting period has not concluded. Lastly, because all applicants to MOHCD's Mortgage Credit Certificate Program are included in the rental and ownership housing placement data, individual reporting of that program is excluded.

This analysis presents both summarized data on the number of lesbian, gay, bisexual, transgender, and questioning (LGBTQ) applicants and clients as well as disaggregated data for both gender identity and sexual orientation. For the purpose of this analysis, this report summarizes applicants or clients as LGBTQ if he/she/they identified as either genderqueer/gender non-binary, trans female, trans male, as a gender different from his/her/their sex-at-birth, or described his/her/their sexual orientation as bisexual, gay/lesbian/same-gender loving, or questioning/unsure.

This report also summarizes applicants or clients that selected "Not Listed" for either (or both) of the SOGI questions as LGBTQ only if the applicant or client specified a gender identity or sexual orientation in the accompanying entry field. If an applicant or client left the accompanying entry field blank, this report classifies the response as "Decline to Answer." For disaggregated gender identity and sexual orientation data, this report provides data on both applicants who either declined to answer the questions or selected "Decline to Answer" and on those who are categorized as decline to answer because he/she/they did not specify a not listed gender identity or sexual orientation.

#### Community Development Public Services

Through its Community Development Public Services, MOHCD funds a wide range of social services that seek to ensure that families and individuals are stably housed, resilient, and economically self-sufficient. MOHCD works toward these objectives by funding grants to community-based service providers through 10 separate program areas. The 10 program areas include: Access to Housing; Eviction Prevention; Financial Education; Foundational Competencies; Homeless Services and Transitional Housing; Housing Place-Based Services; Legal Services; Service Connection; Supportive Housing for People Living with HIV/AIDS; and Sustainable Homeownership. For FY2017-18, MOHCD funded 191 projects that provided services to more than 35,000 clients, of whom approximately 8% identified as LGBTQ. In looking more closely at gender identity and sexual orientation, the data shows that slightly more than 2% of MOHCD's public service program clients identify as trans/gender non-conforming, with trans female clients representing the greatest number (395), followed by trans male (272). Slightly more than 6% of clients identify as LGBTQ, with the greatest share of clients identifying as gay/lesbian/same gender-loving (4.65%). Table 2 presents the

total number and percentage of LGBTQ clients served as well as the number and percentage of clients for both gender identity and sexual orientation for all public services.

**Table 2:** Number and Percent of LGBTQ Clients and the Number and Percent of Clients by Gender Identity and Sexual Orientation for Community Development Public Services

	Number of Clients	Percent of Clients
LGBTQ Client	2,812	8.00%
Not LGBTQ Client	32,064	91.23%
Decline to Answer	270	0.77%
<b>Total Clients</b>	<b>35,146</b>	<b>100%</b>
<b>Gender Identity</b>		
	Number of Clients	Percent of Clients
Female	19,757	56.21%
Male	14,361	40.86%
Genderqueer/Gender Non-Binary	77	0.22%
Trans Female	395	1.12%
Trans Male	272	0.77%
Not Listed	2	0.01%
Decline To Answer	282	.80%
<b>Totals</b>	<b>35,146</b>	<b>100%</b>
<b>Sexual Orientation</b>		
	Number of Clients	Percent of Clients
Bisexual	448	1.27%
Gay/Lesbian/Same-Gender Loving	1,628	4.63%
Questioning/Unsure	115	.33%
Straight/Heterosexual	16,580	47.17%
Specified Not Listed	1	0.00%
Decline to Answer	12,632	35.94%
<i>Decline to Answer</i>	10,896	31.00%
<i>Unspecified Not Listed</i>	1,736	4.94%
Question Not Asked	3,742	10.65%
<b>Totals</b>	<b>35,146</b>	<b>100%</b>

A more granular analysis of the 10 Community Development Public Services show that the number and percentage of LGBTQ clients varies across programs. MOHCD served the greatest number of LGTBQ clients through its Legal Services program (633), followed by Access to Housing (618), and then Eviction Prevention (374). These three programs represent the three largest public service programs in terms of overall number of clients served. LGBTQ client representation by program was greatest for Supportive Housing for People Living with HIV/AIDs, of which almost 59% of program clients identified as LGBTQ, followed by Homeless Services & Transitional Housing (14.55%), and Access to Housing (11.72%). Service Connection (3.45%), Foundational Competencies (4.23%), and Eviction Prevention (5.57%) had the smallest percentage of LGBTQ clients. Table 3 shows the total number and percentage of LGBTQ clients by each of the 10 Community Development Public Service program areas.

**Table 3:** The Number and Percent of LGBTQ Clients by Community Development Public Service Program Area

	<b>Total Number of Clients</b>	<b>Number of LGBTQ Clients</b>	<b>Percent LGBTQ Clients</b>
Access to Housing	5,273	618	11.72%
Eviction Prevention	6,710	374	5.57%
Financial Education	2,943	201	6.83%
Foundational Competencies	2,150	91	4.23%
Homeless Services & Transitional Housing	893	129	14.45%
Housing Place-Based Services	3,089	58	1.88%
Legal Services	6,710	633	9.43%
Service Connection	3,766	130	3.45%
Supportive Housing for PLWHA	377	222	58.89%
Sustainable Homeownership	3,235	356	11%
<b>Totals</b>	<b>35,146</b>	<b>2,812</b>	<b>8%</b>

MOHCD funds three LGBTQ and one trans/gender non-conforming targeted projects through its Access to Housing, Sustainable Homeownership, and Service Connection programs. An analysis of this data shows significantly greater representation of LGBTQ clients for these three projects when compared to the public services overall. Amongst these four projects, LGBTQ participation ranged from 90% for a Woman's Place Drop in Center to 29% for the First Time Homebuyer's Program. Table 4 shows the total number and percentage of LGBTQ clients for each of the three LGBTQ-target projects.

**Table 4:** Number and Percent of LGBTQ Clients for Community Development Public Service LGBTQ Projects

	<b>Total Number of Clients</b>	<b>Number of LGBTQ Clients</b>	<b>Percent LGBTQ Clients</b>
LGBT Access to Housing (Access to Housing)	419	271	64.68%
First Time Homebuyer's Program (Sustainable Homeownership)	413	118	28.57%
Youth Advocacy for LGBTQ TAY (Service Connection)	47	35	74.47%
A Woman's Place Drop-In Center (Service Connection)	11	10	90.90
<b>Total</b>	<b>890</b>	<b>434</b>	<b>48.76%</b>

### Rental and Ownership Housing Placement Programs

MOHCD oversees the marketing and lease up or sale of privately developed affordable inclusionary housing and non-profit developed affordable rental housing. To access these affordable housing opportunities, applicants submit a paper application or can apply online using DAHLIA, MOHCD's web-based housing portal. When applying to a rental or ownership opportunity, MOHCD collects demographic information of the primary applicant of each application, including demographic information on gender identity and sexual orientation. Different from MOHCD's community development programs, MOHCD presents all demographic questions on our affordable housing applications as optional in compliance with Fair Housing laws.

For FY2017-18, MOHCD accepted over 42,000 applications for 389 newly listed units of affordable housing across 18 separate developments. Of the 42,210 applications submitted, just under 14% of the primary applicants identified as LGBTQ. The share of LGBTQ primary applicants varied by the tenure of the project, with more LGBTQ headed households applying to rental housing (14.01%) than to ownership opportunities (10.53%). A significant number of applicants chose not to respond to both the gender and sexual orientation questions. A more detailed analysis show that almost 2% of applicants identify as trans/gender

non-conforming, with trans female clients representing the greatest number of applicants (.81%), followed by genderqueer/gender non binary (.45%). Almost 13% of applicants identified as LGBQ, with the greatest share of applicants identifying as gay/lesbian/same gender-loving (6.71%) followed by bisexual (4.20%), with patterns for both rental and ownership following the same trends. Table 5 presents the SOGI data for MOHCD's rental and ownership placement programs.

**Table 5:** The Number and Percent of LGBTQ Applicants and the Number and Percent of Applicants by Gender Identity and Sexual Orientation to Affordable Rental and Ownership Opportunities

	Rental		Ownership		Total	
	Total Applicants	Percent of Applicants	Total Applicants	Percent of Applicants	Total Applicants	Percent of Applicants
LGBTQ Applicant	5,782	14.01%	99	10.53%	5,881	13.93%
Not LGTBQ Applicant	29,456	71.37%	639	67.98%	30,095	71.30%
Decline to Answer	6,032	14.62%	202	21.49%	6,234	14.77%
<b>Totals</b>	<b>41,270</b>	<b>100%</b>	<b>940</b>	<b>100%</b>	<b>42,210</b>	<b>100%</b>

#### Gender Identity

	Rental		Ownership		Total	
	Total Applicants	Percent of Applicants	Total Applicants	Percent of Applicants	Total Applicants	Percent of Applicants
Female	21,568	52.26%	420	44.68%	21,957	52.09%
Male	16,253	39.38%	369	39.26%	16,584	39.38%
Trans Female	186	0.45%	2	0.21%	340	0.45%
Trans Male	337	0.82%	3	0.32%	271	0.81%
Genderqueer/Gender Non-Binary	268	0.65%	3	0.32%	188	0.64%
Not Listed	5	0.01%	0	0%	84	0.01%
Decline to Answer	2,653	6.43%	143	15.21%	2,786	6.62%
<b>Totals</b>	<b>41,270</b>	<b>100%</b>	<b>940</b>	<b>100%</b>	<b>42,210</b>	<b>100%</b>

#### Sexual Orientation

	Rental		Ownership		Total	
	Total Applicants	Percent of Applicants	Total Applicants	Percent of Applicants	Total Applicants	Percent of Applicants
Bisexual	1,758	4.26%	16	1.70%	1,774	4.20%
Gay/Lesbian/Same-Gender Loving	2,758	6.68%	73	7.77%	2,831	6.71%
Questioning/Unsure	441	1.07%	2	0.21%	443	1.05%
Straight/Heterosexual	29,837	72.30%	644	68.51%	30,481	72.21%
Specified Not Listed	357	.87%	2	0.21%	359	.85%
Decline to Answer	6,119	14.83%	203	21.60%	6322	14.98%
<i>Decline to Answer</i>	<i>4,715</i>	<i>11.42%</i>	<i>203</i>	<i>21.60%</i>	<i>4,918</i>	<i>11.65%</i>
<i>Unspecified Not listed</i>	<i>1,404</i>	<i>3.40%</i>	<i>0</i>	<i>0%</i>	<i>1,404</i>	<i>3.33%</i>
<b>Totals</b>	<b>41,270</b>	<b>100%</b>	<b>940</b>	<b>100%</b>	<b>42,210</b>	<b>100%</b>

#### Certificate of Preference and Displaced Tenant Housing Preference Programs

MOHCD selects applicants to the affordable rental and ownership housing opportunities through lotteries. For these lotteries, MOHCD administers a number of preference programs that improve an applicant's chances in the lottery. For most preference programs, MOHCD determines program eligibility at the time of application. However, for the Certificate of Preference (COP) and Displace Tenant Housing Preference (DTHP) programs, MOHCD requires an eligible person to apply to the program before submitting an application to an affordable housing listing. The Certificate of Preference is a special document that gives highest priority to applicants in City-sponsored housing lotteries. The former San Francisco Redevelopment Agency issued them to displaced households in the 1960s and 1970s. The Displaced Tenant Housing Preference helps renters that have been displaced by a no-fault eviction or fire.

For FY2017-18, 221 and 306 total households applied to the COP and DTHP lottery preference programs, respectively. Of the total applicants, 3.62% of COP applicants and 9.80% of DTHP applicants identified as LGTBQ. A more detailed review of gender identity and sexual orientation show that less than 1% of COP and DTHP applicants identify as trans/gender non-conforming with 3% and 10% of COP and DTHP applicant identifying as LGBQ. Table 7 shows the number and percentage of applicants to each lottery preference that identified as LGTBQ as well as their gender identity and sexual orientation.

**Table 6:** The Number and Percentage of LGBTQ Applicants and the Number of Applicants by Gender Identity and Sexual Orientations to COP and DTHP Lottery Preference Programs

	COP		DTHP	
	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants
LGBTQ Applicant	8	3.62%	30	9.80%
Not LGBTQ Applicant	146	66.06%	270	88.24%
Decline to Answer	67	30.32%	6	1.96%
<b>Totals</b>	<b>221</b>	<b>100%</b>	<b>306</b>	<b>100%</b>

  

Gender Identity	COP		DTHP	
	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants
Female	100	45.25%	166	54.25%
Male	53	23.98%	131	42.81%
Genderqueer/Gender Non-Binary	1	0.45%	3	0.98%
Decline to Answer	67	30.32%	6	1.96%
<b>Totals</b>	<b>306</b>	<b>100%</b>	<b>306</b>	<b>100%</b>

  

Sexual Orientation	COP		DTHP	
	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants
Bisexual	4	1.81%	12	3.92%
Gay/Lesbian/Same-Gender Loving	2	0.90%	16	5.23%
Questioning/Unsure	1	0.45%	4	1.31%
Straight/Heterosexual	97	43.89%	160	52.29%
Decline to Answer	117	52.94%	114	37.25%
<b>Totals</b>	<b>221</b>	<b>100%</b>	<b>306</b>	<b>100%</b>

### Plus Housing

Plus Housing is a housing prioritization program that replaces the closed HIV Housing Referral List (HHRL). The program helps low-income people living with HIV access permanent housing or subsidies. For FY2017-18, 608 individuals submitted an application to the program. Of the 619 total applicants, almost more than 74% identified as LGBTQ, the greatest percentage of LGBTQ participants for any MOHCD program. Analysis of disaggregated gender identity and sexual orientation data show that almost 8% of applicants identify as trans/gender non-conforming and over 70% as LGBQ. Table 7 details the number and percent of LGBTQ applicants as well as by gender identity and sexual orientation.

**Table 7:** The Number and Percentage of LGBTQ Applicants and the Number of Applicants by Gender Identity and Sexual Orientation to the Plus Housing Program

<b>Gender Identity</b>		
	<b>Number of Clients</b>	<b>Percent of Clients</b>
LGBTQ Applicant	452	74.34%
Not a LGBTQ Applicant	146	24.01%
Decline to Answer	10	1.64%
<b>Totals</b>	<b>608</b>	<b>100%</b>

  

<b>Gender Identity</b>		
	<b>Number of Clients</b>	<b>Percent of Clients</b>
Female	73	12.01%
Male	478	78.62%
Genderqueer/Gender Non-Binary	12	1.97%
Trans Female	31	5.10%
Trans Male	3	0.49%
Decline to Answer	11	1.81%
<b>Totals</b>	<b>608</b>	<b>100%</b>

  

<b>Sexual Orientation</b>		
	<b>Number of Clients</b>	<b>Percent of Clients</b>
Bisexual	54	8.88%
Gay/Lesbian/Same-Gender Loving	356	58.55%
Questioning/Unsure	8	1.32%
Straight/Heterosexual	144	23.68%
Specified Not Listed	11	1.81%
Decline to Answer	35	5.76%
<b>Totals</b>	<b>608</b>	<b>100%</b>

### Discussion of Analysis

For FY2017-18, MOHCD served a significant number of persons who identify as LGTBQ, though LGBTQ representation across MOHCD programs and grant-funded services varied. Of the 78,270 total applicants and clients served across all the programs and services detailed in this report, 11.73% identified as LGBTQ. Plus Housing had the greatest representation, with 74.34% identifying as LGBTQ. Given the disproportionate impact of the HIV epidemic on the LGBTQ population historically, this high representation might be expected. Applicants to MOHCD's affordable rental opportunities represented the second highest percentage of individuals identifying as LGBTQ (14.01%). LGBTQ applicants to MOHCD affordable rental opportunities also represents the program with the greatest number of LGBTQ program participants (5,782). LGBTQ representation was smallest for the Certificate of Preference program, with only eight of the 221 applicants (3.62%) identifying as LGBTQ. As stated above, LGBTQ representation was significant across three program areas (Access to Housing, Homeless Services & Transitional Housing, and Supportive Service for PLWHA) and for the four grant funded projects that target LGBTQ populations. When combined with other program areas, the percentage of Community Development Public Services clients identifying at LGBTQ decreased to 8% of the 35,146 total clients served, reflecting the impact of providing targeted LGBTQ programming when attempting to serve this population.

While it difficult to assess whether MOHCD underserves LGBTQ populations through its various program and services, MOHCD can takes additional steps to ensure that LGBTQ programs are more accessible to LGBTQ individuals. A first step would be the establishment of an intradepartmental working group on LGBTQ equity, which would augment existing department efforts that MOHCD has established to address racial equity. Equity is a value an organizational value at the Mayor's Office of Housing and Community



Development. In 2018, MOHCD's leadership established an equity committee that deals explicitly with race. The Racial Equity Working Group is a diverse, cross-departmental body that has been empowered to convene monthly for equity-based discussions, planning and other considerations – including intersectionality.

Another principle step that MOHCD will take toward assessing LGBTQ access would be to improve the quality of SOGI data. A review of SOGI data across MOHCD's programs and services show that some individuals, grantees, or partner organizations are incorrectly interpreting the responses to the gender identity and sexual orientation. The use of the "Not Listed" responses is specifically problematic, particularly for the sexual orientation question, as some it is sometimes interpreted as a decline to answer option. For example, almost 5% of the Community Development Public Services clients identified as a sexual orientation other than one listed. MOHCD can improve the accuracy of SOGI data collection with additional grantee and partner organization. Additionally, MOHCD will explore options how to better present the "Not Listed" response on both its paper and electronic applications in order to reduce the number of invalid responses. MOHCD will also explore whether there are specific cultural or language-related barriers within communities and the organizations based in those communities that may reduce the voluntary reporting of the individual's LGBTQ identify, and examine possible ways to overcome those barriers.

cc:

Clair Farley, Office of Transgender Initiatives