

Sumant Dhall
Luis Gomez
George Mathew
Heather Morelli
Raquel Romano

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TECH TALENT PROJECT



Streamlining Fair Housing Complaint Intake Using Generative Al Technology

As part of their policy training, the leaders of the Tech Executive Leadership Initiative culminated their program working on a real-world government challenge. In teams of 4 or 5, leaders proposed ideas to help the State of Georgia's Commission on Equal Opportunity use technology to augment the intake and investigations capacity of its Fair Housing Division. Each team narrowed its focus to a specific part of the problem, conducted research, and developed solutions. Below is an overview of one team's solution: expediting the Fair Housing complaint intake process using artificial intelligence tools.

EXECUTIVE SUMMARY

The Georgia Commission on Equal Opportunity (GCEO) and the Georgia Office of Digital Services & Solutions should undertake a pilot project to (1) rebuild the state's Fair Housing Complaint Form into a wizard that guides the person with a complaint through a set of targeted questions that provide structured and relevant information about their complaint; and (2) partner with a generative artificial intelligence (GenAI) vendor to convert the output of the new complaint form experience into a draft "perfected complaint" or "dismissal letter" for an intake officer's approval. This process would help intake officers complete more cases comprehensively and would allow the state to experiment with GenAI in a safe setting. Based on preliminary budget research, deploying and maintaining this solution would cost approximately \$200,000 in year 1 (\$50,000 a year afterward) and would allow intake officers to reduce an intake form's process time from 70 to 56 days (assuming a 20% gain in productivity from the use of GenAI). If this pilot is successful, we recommend that the GCEO experiment with a virtual assistant to help complainants fill out their applications, which would allow for even greater savings in staff time.



BACKGROUND

Background on Agency & Problem

The Georgia Commission on Equal Opportunity – Office of the Governor is a state agency that is responsible for safeguarding Georgians from discrimination in housing and employment. The GCEO's Fair Housing Division is specifically responsible for enforcing the Georgia Fair Housing Law, which provides residents with protections in the rental, sale, purchase, or inspection of a dwelling based on the following protected classes: "race, color, religion, sex, disability, familial status, or national origin."

Georgia residents who believe that they are a victim of unlawful discrimination in housing may submit a <u>formal inquiry form</u> to the state for investigation. Once this form is filled out, a state intake officer follows up with the claimant to gather more information and ensure that the complaint is jurisdictional based on the Georgia Fair Housing Law and fits the agency's statutory format. Once a claimant files a complaint with the assistance of an intake officer, the complaint is sent to the division's Enforcement Unit for further investigation. The state typically receives around 1,750 housing related inquiries per year, and those inquiries are converted to about 250 official fair housing complaints per year.

Current Processes at Georgia's Commission on Equal Opportunity

As of 2024, the intake team of the GCEO Fair Housing Division is understaffed and has high turnover. This has led to reduced productivity and increased cycle time to process complaints: despite a statutory requirement to process intake requests in less than 30 days¹, it currently takes over 70 days on average.²

The current intake form leads to inefficient outcomes. Only about 15% of submitted intake complaints are turned into formal complaints to be investigated by the GCEO investigators. The current intake form is ineffective because it has only a few structured input fields and many open text fields that require the complainant to use their own judgment about the type of information that will be useful for the GCEO to address their complaint. The intake must therefore be analyzed whether it is jurisdictional and reworded into the third person to comply with statutes. As a result, the intake officers spend most of their time a) obtaining missing information from the complainant; b) analyzing relevant information; c) determining whether the GCEO has jurisdiction³ over the issue (e.g. they have the ability to move the complaint forward); and d) rewording and reformatting the information to create the dismissal letter or the perfected complaint (Form 903) to be signed by the complainant, notarized, and handed off to the investigation team.⁴

New Technologies for Forms and Analysis

Guided forms, also known as wizards, can ensure that the user is prompted for **relevant, complete, and structured information** and can alleviate the need for time consuming and tedious information extraction and analysis. In both the <u>public</u> and <u>private</u> sectors, guided forms with conditional logic are a well established way to collect only the most critical information required from the user while reducing error and cognitive load. The Louisiana Supreme Court Technology Commission has created 2 such forms to help residents file for divorce and request a name change.

Generative AI technology can also help process the structured data generated by guided forms. It can analyze inputs and formulate responses at a **scale and speed** that simply cannot be matched by humans. For example, law firms are using GenAI technologies as semiautomated legal assistants to accelerate research and contract revisions. But this technology also comes with inherent risks such as "hallucinations" (inventing information), data privacy violations, and biased outputs. We recommend addressing these risks by requiring that the GenAI-based letter generator adhere to the guidelines set forth by the Georgia Technology Authority in its Guiding Principles for AI and its standards for Artificial Intelligence Responsible Use.

RECOMMENDATION

We recommend a 3-step approach for the GCEO to improve its intake process. Specifically, we recommend that the GCEO partner with the Office of Digital Services & Solutions to:

- 1. Develop a guided complaint intake wizard to replace its current intake form. This new, guided experience would consist of conditional logic that guides the complainant through a set of questions aimed at obtaining structured and unambiguous information about their inquiry. The wizard would use this logic to produce a recommended **determination of jurisdiction** for review by the intake officer from an intake complaint dashboard.
- 2. Pilot a GenAI-based letter generator for review by the intake officer that would draft a "perfected complaint" (that is, drafting and filing HUD Form 903) if the determined jurisdiction is "Yes" or a dismissal letter to close the case if the determined jurisdiction is "No." The Office of Digital Services & Solutions should find a GenAI vendor to help develop this feature.
- 3. Implement an automated appointment scheduler. If the complaint intake logic cannot determine **the jurisdiction**, and the intake officer reviews and approves the recommendation for a follow-up discussion with the complainant, a message would be automatically sent to the complainant with a link to the intake staff's public calendar to book an appointment.

The guided intake wizard should be based on the rules that are currently implicitly or explicitly followed by intake staff. These rules are complex and not easily understood without training and time on the job. Due to the current retention concerns and understaffing, formalizing these rules into a guided form would

ease the training burden on new hires and tenured staff. Using GenAI to draft the perfected complaint (Form 903) or dismissal letter would reduce the tedious work of properly structuring and formatting these letters, and the requirement for human review would address concerns about bias and inaccuracies.

Additional implementation details can be found in the accompanying documents listed below.

Governance

The Georgia Office of Digital Services & Solutions should implement this GenAI technology in accordance with the **guiding principles** and **governance procedures** outlined by the Georgia Technology Authority. In particular, it should follow governance procedure no. 4, "Ensuring Accuracy and Appropriateness of AI–Generated Outputs," by requiring human judgment to approve any AI–generated content. Additionally, the intake process should follow governance procedure no. 5, "Data Protection, Safety and Privacy," to protect input data via proper authorization, protection, and security measures.

Budget, Value and Success Metrics

- ▶ Based on our preliminary research, we estimate that the budget required for this solution <u>would not exceed</u> \$200,000 for the pilot implementation and \$50,000/year for ongoing maintenance.
- ▶ Based on a **~\$500,000/year spend** on intake employee salaries, even a modest 20% percent productivity improvement overall for intake employees will equate to ~\$100,000/year in value. Therefore, if the initial implementation took a full year to develop, the program would be **cost neutral in 5 years.**
- Cost neutrality would be achieved much sooner if the initial development took less than a year or if productivity increases exceeded 20% during the pilot.
- ▶ Cost neutrality would also be achieved much sooner if the use of **GenAI technology is expanded** to other aspects of the intake and investigation process, such as a virtual assistant that guides the complainant through the intake process.
- The improved productivity would increase the capacity of the intake team and translate into a reduction in intake processing time. So, in the pilot phase, a 20% productivity improvement would result in a 20% decrease in the processing time, bringing average processing time down from 70 days to 56.

For more information about this project, please see the attached prototype mockups of the guided wizard.

ENDNOTES

- 1 "Section 5: No Cause Determination," Title VIII Fair Housing Complaint Process, United States Department of Housing and Urban Development (HUD), accessed February 22, 2024, https://www.hud.gov/sites/documents/23536_COMPLAINT-PROCESS.PDF.
- 2 Interview with Allona Cross, February 20, 2024.
- 3 As defined by HUD in "Chapter 4: Complaint Intake," Title VIII Complaint Intake, Investigation, and Conciliation Handbook, accessed February 22, 2024, page 4-5: "if the inquiry contains the four elements of jurisdiction: timeliness, standing, jurisdiction over the subject matter and jurisdiction over the respondent." https://www.hud.gov/sites/documents/80241C4FHEH.PDF
- 4 Interview with Sawida Gladney, February 22, 2024; interview with Allona Cross, supra note 2.





ABOUT TELI

This project was completed as part of the Tech Executive Leadership Initiative (TELI), a partnership between the Aspen Tech Policy Hub and the Tech Talent Project. TELI is a multiweek skills-building initiative that prepares experienced technology leaders to engage effectively with public sector challenges. Learn more at aspentechpolicyhub.org/teli.





