Introduction & Purpose

In May 2021, the U.S. Department of Housing and Urban Development’s (HUD’s) Office of Public and Indian Housing (PIH) issued Notice PIH 2021-15 (HA), which describes the process HUD used to allocate approximately 70,000 emergency housing vouchers (EHVs) to Public Housing Agencies (PHA). Because the Notice requires PHAs to partner with Continuums of Care (CoCs) to accept direct referrals for eligible individuals and families through the CoC’s coordinated entry system (CES), communities will need to consider how to collect data about the EHV referrals in the community’s CES. PHAs must use the referrals from CES to determine the issuance of the EHV (including any reissuance of turned-over EHV during the allowed period for reissuance). This document addresses Homeless Management Information System (HMIS) data collection strategies communities can implement to incorporate referrals for, and placements into, EHV through the community’s CES.

Adequate HMIS project setup and data collection will allow communities to meet reporting needs such as compiling data for the Housing Inventory Count (HIC), track voucher turnover (during the allowed period for reissuance), quickly provide replacement referrals, and evaluate the equitable distribution of EHV. For example, when examining EHV referral data in a community’s CES cross-tabulated with other information already collected in HMIS such as race, ethnicity, age, gender, and disabling conditions, a community will be able to provide an analysis of the household composition of those receiving EHV referrals.

Communities may also elect to share the data and data collection responsibilities with the PHAs in their community, though this is not required. As part of the COVID-19 response, guidance was issued on data sharing that allows PHAs, CoCs, and their strategic partners to collaborate more effectively. That document, COVID-19 Homeless System Response: Public Housing Authority Data Sharing Agreements, provides guidance on data sharing protections, key elements of a data sharing agreement, and a number of templates and examples.

EHV Referral Tracking

At its simplest, EHV referral tracking in HMIS may be done through the existing CES that is established in HMIS for the community. CES tracking in HMIS is not a requirement of CES; however, if HUD-funded CE-Support Services Only projects are to meet the APR requirement of that funding source, data elements 4.19 and 4.20 would already be tracked using either a “no wrong door” approach or “single- or multi-front door” approach to CES project setup and data collection in HMIS. Please refer to the Coordinated Entry Data Management Guide for more information on CES setup in HMIS. More information about methods of extracting EHV referral data is available in the EHV and Coordinated Entry Reporting document.

PHA EHV Project Setup to Track EHV Utilization

If the CoC, PHA, and other stakeholders in the EHV process want to collect all recipients of EHV vouchers and other EHV-related client data in HMIS (which is not required), a project will need to be set up in HMIS for that specific purpose. Many communities already have the PHA set up as an organization in their HMIS for other projects such as McKinney-Vento housing programs. If this is the case, then the EHV will be set up as a project associated with the PHA’s Organization ID. If the PHA is not set up as an organization, then the community should start with organization setup in keeping with the HMIS Data Standards. The following guidance should be used after the PHA is already set up according to HMIS Data Standards instruction for 2.0. The EHV Project being created will be associated with that PHA organization.

The EHV project should be considered an HMIS Participating Project, meaning that all required data elements (minimally the Universal and Program-Specific Data Elements) are either directly collected in HMIS or are submitted to HMIS at least once a year to cover the whole year of required client data for that project. More on the latter method of data collection/sharing can be found in the Federal Register/Vol. 69 No. 146/Friday, July 30, 2004. Further information regarding the data elements to be collected can be found in the HMIS Data Standards.
Project Descriptor Data Elements (PDDEs):

- PDDE 2.02:
  - Continuum Project = “Yes”
  - Project Type = “PH—Housing Only”
  - Field D “Housing Type” = “Tenant-Based—Scattered Site”

- PDDE 2.03: CoC Code = The CoC(s) in which the project is funded to operate.

- PDDE 2.06: Funding Sources = “HUD: Public and Indian Housing (PIH) Programs” until FY 2022 Data Standards begin, and then “HUD: PIH (Emergency Housing Voucher)” should be used.

- PDDE 2.07: Bed and Unit Inventory Information
  - Inventory Start Date = Date the beds become available
  - Inventory records (for distinct Household Types and Bed Types)

HIC Implications

The HIC is a comprehensive inventory for all CoC residential projects that are dedicated to serving individuals and families experiencing homelessness or who were formerly experiencing homelessness within a CoC. The HIC allows HUD and the CoC to understand the residential capacity of the community to serve persons experiencing homelessness. The Office of Special Needs Assistance Programs (SNAPS) Data TA Strategy to Improve Data and Performance vision for data and performance success states that advanced CoCs should strive for 100 percent of all homeless service providers to contribute to HMIS. Therefore, including EHV projects in HMIS as a participating project collecting all Universal and Project-Specific Data Elements is one strategy that will increase the CoC’s data and performance success.

Special attention should be paid to EHVs that are leveraging service dollars for the households in their projects so as to not create duplicate bed inventory. When considering adding EHV utilization to HMIS, please work directly with your HMIS Lead Agency to ensure an accurate representation of the number of beds in your community.

EHVs are portable; therefore, collaboration with PHAs will be critical to understanding how many EHVs are being utilized in a community. CoCs should check with their PHA each year prior to completing the HIC to get an accurate count of the number of EHVs located within their CoC’s geographic area.

Funding the Tracking of EHV Referrals and Utilization using HMIS

There are a number of federal funding sources that can be used to fund the additional capacity necessary to support an increased use of HMIS: CoC funds, Emergency Solutions Grants (ESG) funds, ESG program via the Coronavirus Aid, Relief, and Economic Security (CARES) Act (ESG-CV) funds, Community Development Block Grant (CDBG) program funds, and other federal program or administration funds may be available to cover appropriate costs if the HMIS helps the funded agency meet their program and client reporting requirements.

For most of these federal programs, a change in the funding use may require an update to the identified use of the funds. Communities should review the funding sources being used to understand what updates (admin plan updates, notification of a field office), if any, would need to take place based on the amount of funds that are changing.

If PHAs use HMIS for housing search assistance, the use may be considered an eligible activity under administrative funds.

Additional Assistance Needed

For any questions that were not addressed in this document, or if there are specifics questions to your own systems, please submit an HMIS AAQ to receive a thorough answer: https://www.hudexchange.info/program-support/my-question/

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