Grant Consolidation and Closing Projects: How to handle client data in HMIS

Rationale: There are a variety of circumstances that may require a client or a group of clients to be moved from one project to another project in HMIS. For example, grants may be consolidating, or a new recipient may be taking over the project. The method used to transfer data from one project to another can have significant impact on the way client and system data are reported. On the one hand, if clients are exited from one project and re-entered into a new project, the method could cause income measures and length of participation calculations for the transferred projects to significantly change the recipient's Annual Performance Reports (APR), System Performance Measures (SPMs) or other local reports. On the other hand, administrative moves can impact how a CoC reports its project inventory, which can affect system planning and HUD reporting.

Considerations: When project or client transfers are needed, the method used <u>must</u> be determined by the HMIS system administrator and the recipient entities involved in the transfers and <u>must</u> be decided prior to the end of an operating year. Considerations must include scope of the transfer, cost and staff resources involved, and data quality impacts associated with each method below. CoCs should choose the method that best addresses resource availability, data quality of performance measures, and required reporting completion. Whatever method is used, notes and other documentation should be kept on file for auditing purposes and to explain any data discrepancies that may arise in future report submissions. If you are not sure which method works best for your CoC, please submit an HMIS AAQ for additional assistance.

Terminology: When two or more grants are consolidating into a single grant, that single grant is referred to as the "**surviving grant**", the grant(s) that are ending are referred to as the "**terminating grant(s)**". Clients who are active on the first day of the next operating year are referred to as "**stayers**". A **system administrator** is the person(s) from the HMIS Lead agency who has administrative rights over the data, sets up the projects in the HMIS, ensures data quality, and closes all projects which have ended. These are not persons at a recipient agency other than the HMIS Lead Agency. In some CoCs, the HMIS vendor has also been contracted to serve as the system administrator.

Below are four different options for handling client data transfers, grant consolidations or project closures, organized by transfer of client level records versus project level records.

Client Transfer Method A: Administratively move complete client records from one project to another in HMIS

Method Details and Considerations: A client record is "selected" by the system administrator and "moved" to a different project. By doing this, all of the history of the client in a project and the integrity of the client's project record remain intact. However, there is an impact on past bed utilization rates when this method is employed. System administrators should be aware of all historical recordkeeping implications using this method, including bed inventory implications in each step below.

General Instructions:

Step 1	Identify the project in HMIS that is to be used for the surviving grant in which the stayers in the project that has terminated will now be participating. This project may be an existing project in the HMIS or a totally new project.
Step 2	At the end of the operating year of the terminating grant or closing project, generate the APR for the operating year from the HMIS (prior to moving records). Thoroughly review the APR generated and upload the CSV into Sage to ensure there are no errors. All information needed for reporting on clients for grants other than HUD should also be extracted prior to the change.
Step 3	Move the client record into the surviving grant's project in HMIS administratively. At this step, the system administrator must also adjust the bed inventories in the affected projects accordingly. For example, once the client record is moved to the surviving project, use that client's Project Start Date as the Inventory Start Date with a reduction by one bed/unit in the terminating project's inventory record and that client's Project Start Date as the Inventory Start Date with an increase by one bed/unit in the surviving project's inventory record.
Step 4	If all active clients are administratively moved and inventory records updated according to steps 1, 2, and 3 above, the system administrator may now close the terminating project in HMIS by documenting an accurate Operating End Date according to the last exit date of the client records that remain.
Data Quality Check	The client record(s) for stayers are transferred as if the client had always been enrolled in the surviving project; therefore, the bed inventory must be adjusted as if the surviving project had a bed available on the date of project enrollment for each affected client, and the terminating project inventory must be reduced for each affected client, effective the same date.
Performance Measures Check	The length of stay(s) and income measure outcomes in APRs, SPMs, LSAs, and other required reporting would remain relatively unaffected by the administrative moves, as if the client has always been enrolled in the surviving project and therefore any gains made by the client are the surviving project's to report in subsequent reporting.
Documentation	Documentation of homelessness should be transferred from the original project to the surviving project. If the surviving project is required to serve chronically homeless persons, documentation of chronic homelessness must move from the original project to the surviving project. Documentation and eligibility discrepancies should be addressed by the recipient entities involved in the transfers prior to employing this method.

Client Transfer Method B: Exit client from one project and start in another project

Method Details and Considerations: A client record is exited from one project with accurate data at the time of exit and entered into a new project with accurate data at the time of project start. This method is typically employed when a client exits one project type for another project type (e.g. emergency shelter to RRH) but may also be used for recording a client's move from one project type to another with the same project type (e.g. PSH to PSH). All historic information about the client remains in the original project and the surviving project will document the information on the client as of the date of project start. There are implications for project-level and system-level reports with this option, particularly when clients participating in one PH project are exited and started in another PH project. There are cases, such as when another PH project is determined to better serve a client, in which an exit in one project and a start in another is unavoidable, but for purposes of closing or transferring whole projects the exit/start method should be carefully considered due to the performance concerns in reporting.

General Instructions:

Step 1	Record a client exit in the original/terminating project as the date of transfer. Select "Permanent housing (other than RRH) for formerly homeless persons" as the destination (for the PH to PH project transfers mostly utilizing this method) or other accurate destination for the actual place the client is exiting to.
Step 2	Record a project start date in the new/surviving project the day of the exit from the old project. If the person was already housed (again, the usual case for PH to PH project transfers), remember also to enter the Housing Move-In Date as the same date as the project start date.
Step 3	Record all data elements as they are on the date of project start in the new/surviving project.
Data Quality Check	Terminating projects that use this method to transfer all records and close a project entirely should record the Operating End Date and Inventory End Date(s) according to the date the client records were all exited.
Performance Measures Check	The client's prior living situation in the new project would be the prior PH project, and the income at entry would reflect any positive income gains made in the terminating project, however, the surviving project would not get to "claim" those gains on future APRs.
Documentation	Documentation of homelessness should be transferred from the original project to the surviving project. If the surviving project is required to serve chronically homeless persons, documentation of chronic homelessness must move from the original project to the surviving project. Documentation and eligibility discrepancies should be addressed by the recipient entities involved in the transfers prior to employing this method. When a client has been exited and entered into a new project, **the Additional Information form in every APR following the move** must indicate to HUD that this person(s) has moved from one PSH or RRH project to another due to the specifics of the situation.

Project Transfer Method A: Reassign the project to the new recipient in HMIS

Method Details and Considerations: All client records of the project are given to the surviving project simply by reassigning the project to another organization in the HMIS. This method requires that the organization operating the current housing must consent to the record transfer. The CoC's HMIS Privacy and Security Policies must not be violated and may require an update to allow for transfers. Records may be edited to remove data other than what is required to be collected by the HMIS Data Standards (e.g. case notes, encounter notes, treatment information, etc.) to maintain client confidentiality, should the terminating organization elect to do so. It is important to note that once the records move to the new recipient the organization which originally collected the information may not be able to access those records. All information needed for reporting on clients for grants other than HUD should be extracted prior to the change. If the original recipient needs to maintain access to the historical data, involved providers and the HMIS Lead should work together to develop a plan for providing this data to the original grant recipient as needed (e.g. read only access to historical project and client records or changing data sharing settings). Depending on who has access to the client's record in the project of the surviving grant, client consent may require it to be updated.

General Instructions:

Step 1	Reassign the project to the organization operating the surviving project by changing the Organization ID and Name in the terminating project. (2.01 Organization Information)
Step 2	Do not change the project ID or project type of the terminating project. Do edit the project name, housing type, and target population as needed. (2.02 Project Information)
Step 3	Update the CoC information, adding geocode and address information as needed. (2.03 CoC Information)
Step 4	Add or edit new grant identifiers and start/end dates. Incorporate the funders associated with the terminating project into the surviving project. (2.06 Funding Sources)
Step 5	Update the bed and unit inventory information as appropriate. (2.07 Bed and Unit Inventory Information)
Data Quality Check	On the day after the end of the operating year, the surviving grant staff should be able to add and append data to existing client records in the surviving grant's organization in HMIS. The terminating project staff should no longer have edit rights to client records in the terminating project.
Performance Measures Check	The length of stay(s) and income measure outcomes in APRs, SPMs, LSAs, and other required reporting would remain relatively unaffected by the reassignment of the project. The client remains enrolled in the project and therefore any gains made by the client are the surviving project's to report in subsequent reporting.
Documentation	Documentation of homelessness should be transferred from the original project to the surviving project. If the surviving project is required to serve chronically homeless persons, documentation of chronic homelessness must move from the original project to the surviving project. Documentation and eligibility discrepancies should be addressed by the recipient entities involved in the transfers prior to employing this method.

Project Transfer Method B: Leave existing projects in HMIS

Method Details and Considerations: If a single organization is operating projects where a grant consolidation occurs, there is no requirement that the projects in HMIS change.

General Instructions:

If the recipient chooses not to consolidate the projects in HMIS, the recipient organization will continue to record client data in the existing HMIS projects and for reporting, generate the required report (e.g. an APR) across all of the projects that have been consolidated into a single grant, into one CSV APR Report. Selecting all of the projects for the single CSV APR will ensure de-duplication and be representative of all clients served by the grant. Similarly, even if the consolidation of grants involves multiple organizations, the projects still do not have to be consolidated in HMIS. Again, a single report would be required to be generated across all of the relevant projects funded by the grant. In cases where there are multiple organizations operating these projects, HMIS sharing/security settings and policy may need to be reviewed/updated so that the recipient can generate the report across multiple agencies, or the HMIS system administrator may be required to generate the report.