

In October 2020, HUD and the U.S. Department of Veterans Affairs (VA) <u>announced</u> that VA has a report available – the HUD-VASH HOMES-HMIS Universal Data Elements Report – which contains HUD-VASH data elements for an HMIS import and a mechanism in place for secure email transmission. HUD has developed a tool for Continuums of Care (CoCs), which will transform this report into a format that meets HMIS technical specifications to enable direct upload into HMIS.

This *optional* data sharing process is intended to improve care coordination for Veterans enrolled in the HUD-VASH program through the development of community partnerships. This data sharing capability also allows CoCs to attain full bed coverage and HMIS participation for the HUD-VASH Program.

The HUD-VASH HOMES-HMIS Universal Data Elements Report contains HUD-VASH data elements for inclusion in HMIS. HUD has developed a HUD VASH Translator Tool (HVTT) for CoCs which will transform this report into a format that meets HMIS CSV technical specifications to support direct upload into HMIS. This translator tool accounts for differences between HOMES programming specifications, data elements and data collection points, as well as project workflow considerations in order to align the HUD-VASH data from HOMES with HMIS Data Standards. The translator tool is available for download at the HUD Exchange: https://www.hudexchange.info/resource/6216/hudvash-homes-to-hmis-translator-tool/

If a CoC already has a data sharing partnership or data entry process with their local VAMC that meets local needs to obtain data for Veterans served in the HUD-VASH program, there is no need to replace that existing solution or partnership. For those without an existing data sharing partnership, HUD recognizes that this exciting announcement also comes with more work for CoCs and HMIS Leads, but HUD and VA anticipate that the benefits to Veterans through improved care coordination and the benefits to CoCs through increased HMIS bed coverage outweigh any costs.

The following list of commonly asked questions is meant to provide guidance to CoC and HMIS leadership to ensure successful import of HUD-VASH data to local HMIS implementations. CoC and HMIS leadership are also encouraged to submit questions to HUD's Ask A Question HMIS desk for additional guidance.

What data will be provided from VAMCs to CoCs?

VA's "HUD-VASH HOMES-HMIS Universal Data Elements Report" contains the HMIS Universal Data Elements and the HUD-VASH Program Specific Data Elements collected in VA's HOMES. This data will be formatted as a single CSV export.

Can the HUD-VASH HOMES-HMIS Universal Data Elements Report provide additional data elements that are of interest to a local CoC?

No, the data included in this report represent all the data elements that VA is authorized to provide nationally on a consistent basis to HUD CoC partners. However, if VAMCs and local CoCs have implemented data sharing partnerships that consist of Veteran data beyond what is included in the HUD-VASH HOMES-HMIS Universal Data Elements Report, that data may continue to be shared in a method and frequency that is acceptable to both VA and HUD partners.

The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law, and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

What is the date range of the HUD-VASH data provided?

CoC and VAMC staff should work together to locally negotiate data sharing practices and identify the appropriate date ranges for HUD-VASH participation.

Which Veterans are included in the report?

The Veterans included in the report are at the discretion of the VAMC's Homeless Program Lead. Data in HOMES is recorded by VAMC catchment area, and not by CoC geography; however, the data can be generated with various filters, including Public Housing Authority and individual Veteran. CoCs may need to work closely with their VAMC partners to identify the appropriate Veterans to include in the export. CoCs will only receive information on the Veterans served in their geography and cannot request data for Veterans with HUD-VASH vouchers who have ported outside of the CoC's geography or corresponding PHA jurisdiction. If the VAMC catchment area covers multiple CoCs, each CoC will need to work with the VAMC to obtain their CoC's relevant data.

Where can I find PHA points of contact?

Contact information for HUD public housing authorities (PHAs) can be found at the following link: https://www.hud.gov/program_offices/public_indian_housing/pha/contacts/

What does the CoC do with the HUD-VASH data included in the HUD-VASH HOMES-HMIS Universal Data Elements Report?

How the data are handled by each CoC will depend on the technical capabilities of the CoC's HMIS software. The file generated by the HUD VASH Translator Tool (HVTT) may be imported or CoCs can manually enter the data into the HMIS.

Why is this data being shared?

Data about Veterans being served in the HUD-VASH program is being shared in order to improve coordination of care for Veterans experiencing homelessness, to increase HMIS participation and bed coverage, to improve coordinated entry processes, and to inform CoC strategic planning efforts. CoCs and VAMCs should collaboratively work to define any additional necessary uses and purposes for the HUD-VASH HOMES-HMIS Universal Data Elements Report and ensure that the goal of preventing and ending homelessness among Veteran households is furthered at every opportunity.

What is the HUD-VASH Translator Tool (HVTT)?

The <u>HUD-VASH Translator Tool (HVTT)</u> is an Excel-based tool designed to import the HUD-VASH HOMES-HMIS Universal Data Elements Report and transform it into a zipped set of CSV files in the HMIS CSV standard format to facilitate upload into HMIS. HMIS Leads using the tool will be required to manually enter Project Descriptor data in order to properly generate the HMIS CSV file.

How do I find out more about my HMIS software vendor's import capabilities?

HMIS software vendors have different approaches to managing data imports, including data quality validations and file formats. You should review your contract with the HMIS software vendor to determine what data import capabilities are currently provided.

Can HMIS project funds be used to build out HMIS software if necessary, to facilitate an import of HUD-VASH data into a CoC's HMIS implementation?

Yes, upgrading, customizing, and enhancing the HMIS is a CoC Program eligible cost for the HMIS Lead at §578.57(a)(2)(iii) and integrating data is an eligible cost at §578.57(a)(2)(iv). HUD recognizes that HMIS software vendors have various ways of importing data into an HMIS software and there may be costs associated with implementing these import processes. While HUD is confident that the tool will support most imports, some HMIS software products still may not allow the report to be imported. In these instances, HUD TA will help troubleshoot, but there may be some CoCs that will have to manually enter the data or pursue a different avenue to include the data in HMIS.

Does the CoC and/or HMIS Lead need to integrate data through the HVTT?

No – CoCs should use whatever method works best for them. For instance, if a CoC has an existing process for entering HUD-VASH data, they can continue to use that process.

How often will HUD-VASH data from HOMES be made available to CoCs?

HUD and VA encourage CoC and VAMC partners to determine a frequency of data/report availability that meets locally defined needs, while ensuring that unnecessary burdens are not placed on clinical staff or others whose primary mission is to serve Veterans. Depending on the turnover of HUD-VASH vouchers for the PHA or PHAs in a CoC's geography, quarterly reports or an annual report may be appropriate. Note that HUD's minimum standard for HMIS participation is annual, so an annual import of HUD-VASH data from HOMES is sufficient to attain full HMIS participation for HUD-VASH units.

Who is responsible for what in this process?

CoC

- •Identify single point of contact for managing HUD-VASH data import for the CoC
- Work collaboratively with local VA Homeless Program Lead to determine report frequency of the HUD-VASH HOMES-HMIS Universal Data Elements Report
- •Ensure privacy and confidentiality protections are documented in local policy and governance documents, and are also in place within the HMIS software, for HUD-VASH participants once the data is imported into HMIS

HMIS Lead (or CoC-defined POC)

- •Ensure HMIS software has appropriate import capabilities and data sharing settings for managing client-level imports
- •Identify VAMC HUD-VASH point of contact and initiate request for HUD-VASH HOMES-HMIS Universal Data Elements Report (including providing list of PHAs within the CoC's geography to support accurate report generation)
- Receive HUD-VASH HOMES-HMIS Universal Data Elements Reports via encrypted email
- Utilize the translator tool (if necessary) and validate HUD-VASH HOMES-HMIS Universal Data Elements Report with any data quality checks prior to import into HMIS
- Import the HUD-VASH data into HMIS and securely store or destroy the HUD-VASH HOMES-HMIS Universal Data Elements Report to ensure the protection of Veteran privacy and confidentiality

VA Homeless Program Lead

- Receive request for HUD-VASH HOMES-HMIS Universal Data Elements Reports from the CoC's single point of contact
- •Identify correct report parameters by CoC's corresponding PHA or PHAs and by individual Veteran enrolled in the HUD-VASH program
- Provide HUD-VASH HOMES-HMIS Universal Data Elements Report to the CoC's designated single point of contact

What precautions do CoC and HMIS leadership need to take to protect the privacy and confidentiality of Veterans who are included in the HOMES data set?

VAMCs are making Veteran data available through the HUD-VASH HOMES-HMIS Universal Data Elements Report in accordance with all VA privacy and confidentiality requirements. CoCs must adhere to all HUD privacy, security, and confidentiality requirements. HUD encourages CoCs to closely review all privacy policies for clarity, comprehensiveness, and compliance with all data access and use requirements to ensure that all Veteran data is transmitted, stored, and shared in accordance with all federal and local requirements. You can learn more about HUD's privacy policies by reviewing the 2004 HMIS Technical and Security Standards and the recent Coordinated Entry Data Management Guide.

Can CoCs redisclose HUD-VASH data from HOMES to other community partners after the local VAMC discloses the data to the CoC?

Once the HUD-VASH data from HOMES has been disclosed by VA and integrated with HMIS data, it is considered to be HMIS data. The data is then subject to all HMIS policies and procedures, including the CoC's HMIS privacy standards, which may allow for sharing with community partners. HUD's HMIS privacy standards apply to all agencies, projects and individuals that record, use or disclose protected personal information for an HMIS. This includes employees, volunteers, affiliates, contractors and associates, regardless of funding source. This data may also be redisclosed by CoC and HMIS leadership to community partners and service providers to support the coordination of care for Veterans participating in the HUD-VASH program. Baseline or minimum standards require that the CoC, HMIS, service providers and individual end users:

- I. Must comply with other federal, state, and local confidentiality laws
- II. Must comply with limits to data collection (relevant, appropriate, lawful, specified in the privacy notice)
- III. Must have a written privacy policy, which must be posted on their website
- IV. Must post a sign at each intake desk or comparable location with general reasons for collection and reference to privacy policy

In addition, because the HUD-VASH data being provided by VAMCs includes only relevant Universal Data Element data, the privacy requirements of 38 USC 7332 that ensure confidentiality of HIV, sickle cell anemia, or diagnosis/treatment of drug or alcohol abuse do not apply.