

# HMIS LEAD WEBINAR

July 20, 2022



# PURPOSE

## Homeless Management Information System (HMIS)



Inform HMIS Leads & System Admins of upcoming HMIS events, information, and changes to guidance



Provide broad overviews of HMIS guidance & foundational HMIS knowledge



Provide forum for questions from the field of HMIS Leads & System Admins



Remind CoCs and HMIS Leads about upcoming reporting deadlines & reporting requirements using HMIS and other data sources



Provide leadership to HMIS Leads & System Admins for implementation success

# WEBINAR REMINDERS

- HUD Exchange Website:
  - For all materials, past, present, future
  - For HMIS Lead listserv management
  - For links to other HMIS information
  - For AAQ submission
- During & after the webinar today:
  - You are muted
  - Use Q&A features of WebEx to interact with us\*
  - Use slide numbers in your questions
  - Follow up via HMIS AAQ submission

## HUD & TECHNICAL STAFF

- Fran Ledger, SNAPS Office (they, them)
- Meradith Alspaugh, PCL (she, her)
- Genelle Denzin, Abt Associates (she, her)
- Elena Hampton-Stover, Collaborative Solutions (she, her)
- Danielle Humes, PCL (she, her)
- Jesse Jorstad, Abt Associates (he, him)
- Brian Roccapriore, Cloudburst (he, him)
- Mary Schwartz, Abt Associates (she, her)
- Kayla Thompson, Abt Associates (she, her)

# AGENDA

## Announcements & Reminders

- Reporting Timelines
- HIC/PIT Update
- NHSDC Recap

## Deeper Dive Content

- SSN Data Collection
- Report Specification Updates
- VAWA and Compliance



# ANNOUNCEMENTS & REMINDERS

HUD Staff & Technical Assistance Providers



# REPORTING TIMELINES

Report	Timeline
Stellavizification	Available Now in HDX 2.0
RHY Q3 Uploads	July 18 – July 29, 2022
ESG-CV Reporting	Due July 30, 2022
SSVF Monthly Uploads – August 2022	August 1-7, 2022



## HIC/PIT UPDATES

- Outreach started this week. If they haven't already, your CoC (CoC "Primary Contact" and HIC/PIT "Submitter" contacts in HDX) should expect to hear from your liaisons by the end of the week.
- Even if your community didn't do an unsheltered count last year, you may see some flags about changes in unsheltered counts. This is based on previously reported data where there still seems to be an unexpected shift in the numbers that needs to be understood and verified.



# NHSDC

- Virtual summer institute recap
- Save the Date: October 24-26 in Seattle for NHSDC Fall 2022



# DEEP DIVES INTO CONTENT

Technical Assistance Providers



# FY 2024 HMIS DATA STANDARDS UPDATES

- Guiding Principles for Data Standards Changes
  - Basing collection on experience of people with lived expertise
  - Grounding data collection in equity and inclusion
  - Burden on client
  - Burden on provider staff (e.g., cost to implement changes)
  - Agency legal requirements (e.g., statute, regulations)
  - Agency reporting requirements (e.g., PRA)
  - Consistent data collection across federal partners
  - Simplest way to collect the necessary data
  - Data that will improve how you operate and coordinate services



# SSN COLLECTION CONCERNS

Concerns that have been raised to HUD about requiring SSN data collection in Data Standards:

- Security
  - safety concerns for survivors
  - identity theft
- Reducing collection burden
- Collecting only what is needed and used to serve and house the individual
- Creates incentive to give false SSN if they don't feel safe or don't have one.



## SSN DATA COLLECTION

- HUD is contemplating removing the requirement to collect SSN. Many discussions are occurring internally, with other federal partners, and other key stakeholders.
- **NOTHING IS CHANGING ABOUT SSN DATA COLLECTION AT THIS TIME.** Any potential changes would become effective in the FY 2024 HMIS Data Standards Update (10/1/2023).

# PROVIDE FEEDBACK

- Please use the Chat feature in Webex to provide HUD with feedback.
- Additional feedback can be provided by AAQ.

<https://www.hudexchange.info/program-support/my-question/>

Select “HMIS: Homeless Management Information System” when asked “My question is related to:”

HMIS Data Standards Team will review and consider all feedback submitted via this forum, from federal partners, or other stakeholder groups.



## FEEDBACK REQUEST # 1

- **Tell us how removing the requirement to collect SSN would impact your (and your users) use of HMIS.**



## FEEDBACK REQUEST # 2

- **What are other ideas on how to de-duplicate client records that don't require a full SSN?**



## FEEDBACK REQUEST # 3

- **Anything else you think is important for HUD and their partners to consider when determining if the SSN collection requirement should be changed?**

# PATH CONTACTS & REPORTING

Contact definition, per [PATH HMIS Manual](#)

An **interaction between a PATH-funded worker(s) and an individual who is potentially eligible for PATH or enrolled in PATH**. Contacts may range from a brief conversation between the PATH-funded worker and the client about the client's well-being or needs, to a referral to service. A **contact must always include the presence of or interaction with the client**—the facilitation of a referral between a PATH-funded worker and another case manager or service provider without the involvement of the client would not be considered a contact. A contact may occur in a street outreach setting or in a service setting such as an emergency shelter or drop-in center. **Contacts are recorded in HMIS using *Current Living Situation* (data element 4.12).**

**Every time a PATH worker contacts a client, they must record a Current Living Situation in HMIS.**



# PATH ANNUAL REPORT

**12a. Instances of contact this reporting period prior to date of enrollment**

**12b. Total instances of contact during the reporting period**

- SAMHSA has clarified how to report PATH contacts using [Current Living Situation], [date of engagement], [PATH Status] and [services provided].
  - If multiple [CLS] are recorded on a single day, count each as a contact.
  - If there is no [CLS] recorded, all remaining types of dates ([date of engagement], [PATH status], [services provided]) should only count once per day, and only when there is no other relevant contact on that day.

# PATH ANNUAL REPORT SPECIFICATION UPDATE

Use any of the records in Determining Which Clients to include – 1. Active as a “contact” with the client. [\[Current living situation\]](#) (4.12) records should each count separately as a contact, even if multiple records occur on the same day. All remaining types of dates ([\[date of engagement\]](#), [\[PATH status\]](#), [\[services provided\]](#)) should only count once per day, and only when there is no other relevant contact on that day. For example, a worker meets with a client, formally engages the client, and enrolls them:

- i. [\[current living situation\]](#) on 6/1/2021 (contact #1)
  - ii. [\[current living situation\]](#) on 6/1/2021 (contact #2)
  - iii. [\[date of engagement\]](#) on 6/1/2021 (not counted as contact as there is already a CLS on 6/1)
  - iv. [\[PATH status - date of status determination\]](#) on 6/2/2021 and [\[client became enrolled in PATH\]](#) = 1 (contact #3)
  - v. [\[services provided\]](#) on 6/2/2021 (not counted as there is already something else on this date)
    - These five records amount to three contacts.
- Updated specs have been provided to vendors and made available on the [HUD Exchange](#).
  - Vendors should have updates programmed by October 1, 2022.



# CE APR CLARIFICATIONS

- **Universe of projects to be included in the APR**
  - Project universe should include *all* projects that collect 4.19 and/or 4.20 data elements.
- **Q10 Total Coordinated Entry Activity During the Year**
  - This table should include **all** coordinated entry data recorded in 4.19 and 4.20 in the report date range, regardless of if clients have a qualifying assessment in the date range.
- Updated specs with these clarifications have been provided to vendors and made available on the [HUD exchange](#).



# SAFETY IS KEY

- National Domestic Violence Hotline:
  - 1-800-799-7233 (TTY 1-800-787-3224), or
    - 911 if it is safe to do so
- National Human Trafficking Hotline:
  - 1-888-373-7888 (TTY: 711)|\*Text 233733



## SETTING THE STAGE

- We acknowledge that survivor data may be in HMIS. However, we will not be discussing this today.
- You may wonder about organizations that are not VSPs that serve survivors. This will not be today's focus.



## TODAY'S DISCUSSION

- Today we will be talking about the Violence Against Women Act (VAWA) and compliance for victim service providers (VSP).
- “VSP” means: a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Such organizations includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs. Our considerations will not cover those non-VSP organizations serving survivors.
- We’ll explore implications for VSPs and for HMIS admins



# FEDERAL PROVISIONS PROTECTING SURVIVOR INFORMATION

- Violence Against Women Act (VAWA)
  - Universal Grant Conditions: Nondisclosure of Confidential or Private Information (VAWA 2013 Section 3: 34 USC §12291 (a)(20) & (b)(2))
  - VAWA amended the McKinney-Vento Homeless Assistance Act at (42 U.S.C. 11363) (VAWA 2005, Section 605)
- Family Violence Prevention and Services Act (FVPSA)
  - FVPSA 42 U.S.C. 10406(c)(5)
- Additional supporting regulations on confidentiality by Department of Justice for Victims of Crime Act (VOCA) grantees



# VIOLENCE AGAINST WOMEN ACT OVERVIEW

- VAWA provides housing protections for survivors of domestic violence, sexual assault, dating violence, and stalking who are applying for or living in federally assisted housing. The law applies to a survivor (actual or perceived) regardless of sex, gender identity, sexual orientation, disability or age. Adopted in 2005 expanded in 2013.
- VAWA does not apply to market-rate rental housing
  - If a voucher is used, VAWA applies.
- Confidentiality provision provides standards for survivor information



# VIOLENCE AGAINST WOMEN ACT BACKGROUND

- Reauthorization in 2013
- HUD issued final ruling related to VAWA protections in 2016
  - Clarified and expanded upon housing protections
  - Required HUD programs to
    - adopt model emergency transfer plans for use in specific HUD covered programs
    - establish policies and procedures where victims of abuse requesting emergency transfer may receive assistance through tenant-based rental section 8, depending on availability.



## VAWA 2013 REAUTHORIZATION CHANGES

- Applies to all survivors: regardless of age, sex, gender identity, race, national origin, familial status, disability, and sexual orientation
- Expands protections to individuals affiliated with victims: spouses, parents, siblings, children, and anyone residing in the household
- Expands protections to more housing programs and enhances housing protections: includes expansion to housing programs such as CoC, ESG, HOPWA, and HOME and enhances protections with emergency transfers

# HUD PROGRAMS COVERED BY VAWA HOUSING PROTECTIONS

HUD Programs	
Public Housing	§ 236 Multifamily rental housing
Section 8 vouchers	§ 221d3/d5 Below Market Interest Rate (BMIR)
Project-based Section 8	HOME
Section 202 Supportive Housing for the Elderly	HOPWA (Housing Opportunities for People with AIDS/HIV)
Section 811 Supportive Housing for People with Disabilities	McKinney-Vento Homelessness Programs (includes Emergency Solutions Grant; Continuum of Care)
Housing Trust Fund	
Department of Agriculture	
Rural Development (RD) Multifamily	
Department of Treasury/IRS	
Low Income Housing Tax Credit (LIHTC)	



## SURVIVOR RIGHTS UNDER VAWA

- Not be denied admission, not be evicted, and not have their assistance terminated because of the violence committed against them;
- Get a notice of housing rights under VAWA;
- Request that an abuser be removed from the lease and housing, where applicable;
- For participants with Housing Choice Voucher assistance, move with continued assistance;



## SURVIVOR RIGHTS UNDER VAWA (CONTINUED)

- Seek an emergency transfer to another in the same program and/or to a unit under another federally subsidized housing program;
- Stay in the unit, even if there is (or has been) criminal activity that is directly related to the violence;
- Strict confidentiality of information;
- Self-certify using the HUD self-certification form. If there is conflicting information, a provider may ask for additional documentation.



# VAWA CONFIDENTIALITY PROVISION

- The VAWA Confidentiality Provision requires all grantees and subgrantees to protect the confidentiality and privacy of persons receiving services.
- Designed to ensure the safety of adult, youth, and child victims of domestic violence, dating violence, sexual assault, and stalking.
- May not disclose, reveal, or release personally identifying information (PII) or individual information collected in connection with services requested, utilized, or denied through grantees' and subgrantees' programs, regardless of whether the information has been encoded, encrypted, hashed, or otherwise protected



## WHAT IS PERSONALLY IDENTIFYING INFORMATION (PII)?

- “Personally identifying information” means information about an individual that may directly or indirectly identify that individual or their location
- Includes name, address, social security number, date of birth
- Can also include information such as an individual’s race or number of children if that information would identify the individual.



## WHEN VSPS CAN RELEASE INFORMATION

- When the victim provides written, informed, and reasonably time-limited consent to the release of information (“a release”);
- When a statute compels that the information be released;
- When a court compels that the information be released.
  - If a statute or court compels the release of information, VSPs must
    - (1) make reasonable attempts to provide notice of the release to affected victims and
    - (2) take steps necessary to protect the privacy and safety of persons affected by the release.



## WHEN SURVIVORS DECLINE TO SHARE INFORMATION

- Both VSPs and CoCs need to ensure meaningful access to housing resources for those who deny to share some information or refuse their information be entered into a database (including comparable databases).
- HUD states that clients cannot be denied service if they refuse to supply identifying information.

# RESOURCES

- Building an Equitable and Trauma-Informed Coordinated Entry and Case Conferencing Process for Survivors: It Takes Time and Intentionality with Alicia Aiken, Rachna Khare, D. Fox, Jill Robertson  
[https://whova.com/portal/nhsdc\\_202104/videos/IQjM5IDOIYTM/](https://whova.com/portal/nhsdc_202104/videos/IQjM5IDOIYTM/)
- Frequently Asked Questions (FAQs) on the VAWA Confidentiality Provision:  
(<https://www.justice.gov/ovw/page/file/1006896/download>)
- Survivor Safety: [https://safehousingpartnerships.org/sites/default/files/2019-05/NRCDV\\_SHP-HUDCoCEmergencySolutionsGrants-2018.pdf](https://safehousingpartnerships.org/sites/default/files/2019-05/NRCDV_SHP-HUDCoCEmergencySolutionsGrants-2018.pdf)

## RESOURCES 2

- Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule: <https://www.govinfo.gov/content/pkg/FR-2016-11-16/pdf/2016-25888.pdf>
- Violence Against Women Act (VAWA) Resources for Multifamily Assisted Housing: [https://www.hud.gov/program\\_offices/housing/mfh/violence\\_against\\_women\\_act](https://www.hud.gov/program_offices/housing/mfh/violence_against_women_act)

# DATA STANDARD REMINDERS

If you have recommendations on changes to the HMIS Data Standards, please submit them to the AAQ:

<https://www.hudexchange.info/program-support/my-question/>

Select “HMIS: Homeless Management Information System” when asked “My question is related to:”

HMIS Data Standards Team will review and vet each request submitted via this forum, AAQs, from federal partners, or other stakeholder groups.

Each change request is considered, but **not all requests or suggestions will be accepted and incorporated** in FY 2024 Data Standards.

## RESOURCE LINKS

- [HMIS Lead Webinars & Archive](#)
- [HMIS Lead Series Tools and Products](#)
- [HMIS Data Standards](#)
- [Comparable Database Decision Tree](#)
- [Comparable Database Manual](#)
- [Comparable Database Checklist](#)
- [HMIS Project Set-up Tool](#)
- [EHVs in HMIS](#)
- [CSV Data Quality Tool](#)

### Newest Resources



## UPCOMING MEETINGS

All meetings are 1:00 pm to 2:30 pm ET

### Welcome to 2022

- ✓ January 19<sup>th</sup>
- ✓ February 16<sup>th</sup>
- ✓ March 16<sup>th</sup>
- ✓ April 20<sup>th</sup>
- ✓ May 18<sup>th</sup>
- ✓ June 15<sup>th</sup>
- ✓ July 20<sup>th</sup>
- August 17<sup>th</sup>
- September 21<sup>st</sup>
- November 16<sup>th</sup>
- December 21<sup>st</sup>