CE Affinity Group Meeting 11.20.19

11/20/19 Page 1 of 20

0:00:02 Mary Schwartz: [0:00:02] _____ Everyone. This is the second day in a row that we are presenting the Affinity Group for coordinated entry. We're so glad you joined us. This will be a repeat for anyone who joined yesterday. So, definitely save yourself on that time if you got to attend yesterday's session.

0:00:26 MS: Welcome. What we're intending to do today, is walk through HMIS project setup and data collection for the new coordinated entry data elements, the coordinated entry systems. Got you, some of the reporting expectations that Abt has and have a lot of time to address your specific questions. I'm gonna run through our presenters, and get us started, but just as a housekeeping you can use the Q and A box there on the right-hand side of your screen to enter whatever questions you have. We will try and verbally address some questions as they come in, we'll try and stop a couple of times throughout the presentation, and make sure questions are addressed.

0:01:10 MS: Please try and reference the slide number as you ask your questions. And, there may be things that we can't answer on this call. And so, they have to be entered into the HMIS AQ will let you know that as well as that's the case. So here with me today, I'm Mary Schwartz from Abt Associates. We have Brian Roccapriore from Cloudburst. We have Abby Miller from the staff's office at HUD. We've Meredith [0:01:36] _____ from the partnership center, and Jules Brown from Abt Associates as well. So, we're gonna get started. And Abby I believe you're up first.

0:01:48 Abby Miller: Alright, thanks Mary. So before we dive into all of the content, I just wanted to give us a moment to step back and think about why we're even collecting coordinated entry data. So, I think there have been so many questions about the nitty gritty and the pain points. So, I think it's just starting here as a good framework. And, so we're collecting coordinated entry data because this is a whole new orientation to one system to thinking about, how we do access and referrals and even a concept of prioritization.

0:02:28 AM: And so, to be able to move forward with continuing to make progress, continuing to make improvements. There are certain things that we have to know... So that we can know what's happening and how we fix things? The first is, there has to be a general sense of who's in need of housing assistance at any given point in time? I have to know who's been prioritized for housing assistance, who's next on the list? I have to understand how many people are accessing the system at a period of time? Who they are, are they families, are they singles? So, we can do better system planning.

0:03:10 AM: And then, we're using it to understand how well the system is functioning and finding bottlenecks. So for instance, if you have an access point that doesn't seem to be referring many people to assessments or you have another access point that's actually doing a great job at diverting people, all of that is helpful to know but you can't know that anecdotally, you have to know that through tracking data. So that, you can find the things that are bottlenecks or the things working well.

0:03:50 AM: So, today what we're talking about is how to set up your coordinated entry data elements in your existing HMIS setup. And, while we had really hoped to be able to have reporting specs at this point for the APR to really closely guide this conversation, I just wanna say at the outset, we do not have reporting specs yet.

0:04:19 AM: They will be coming. We are working on them. I'll say that some of the questions that

11/20/19 Page 2 of 20

we got yesterday and I'm sure questions that we get today are helping us work through some of our decision making in the programming. So, that we will be able to have specs for you as soon as we can. But I do just wanna talk about generally, the types of data that we're going to be including in that reporting. And, I think one of the things that we currently do in the APR is we ask a lot of narrative questions to describe the coordinated entry process and we wanna try to walk back from the burden of those narrative questions and do what I was just saying about meeting data points to really understand what's happening and look at things more like number of persons and household served, the assessment types prioritization status, access events, referral events and just hit these very key milestones.

0:05:25 AM: And so, the reason why we don't have the specs yet is because what we've been working through is that all of you have set up coordinated entry in slightly to widely vary in different ways. And that's perfectly fine. We did not provide guidance over the last handful of years and... So, we've really allowed communities to set up the way that made sense to them. And so, now we're trying to come on the back end and create a reporting schema that works for everybody and doesn't cause you to have to re-do a bunch of work.

0:06:07 AM: And, one of the big things that we've had a lot of confusion about that Jules is gonna talk about a lot today is this idea of coordinated entry, as a project and coordinated entry... We know is not a project, it is a program, it's an orientation, it's a process, but it is not a single project. And so I think at times, we've talked about project to refer to the boundaries that you put around a report.

0:06:43 AM: And that was probably too loose of language for us to be using. But what we're talking about today is that there are required data elements and that you have to figure out how to fit them into the system. You have to figure out how to collect them, and then what we're gonna talk about a lot is about putting the boundaries around those elements and where they're picked up, so that we can get them into reports, because that's when they become useful. So I would ask that folks suspend some of the thinking maybe that you're having coming into this call of like, "We have to dump this all into a single project, and this is gonna blow everything up." And just take today as a chance to step back from that and see that there actually is quite a bit of flexibility that we're building in. So with that, I will turn it over to Jules.

0:07:38 Jules Brown: Thanks, Abby. Hi, everyone. I'm gonna do my best to replicate the conversation that we had yesterday with the other group of folks who joined. Hopefully, we'll be hitting all the same information, but I'm sure you guys might have different questions. We put together these affinity groups, the sort of affinity part of it being whether you have a centralized system or a no-wrong-door system. So the idea being that hopefully you guys all are kind of on the same page in terms of the types of questions that you're asking and those questions will be really meaningful to the other participants in this group. If you also attended yesterday, as Mary said, it's gonna be the same presentation, but the questions might be different from the participants so that might be of interest to you. And sorry if I wasn't listening before, but Mary we're recording these and they'll be posted, right? Yeah, and the question will be posted as well. So that might be good to take a look at if you feel like you want that other perspective as well.

0:08:50 JB: So okay, so as Abby said, we're gonna be talking about this concept of project set up and project being both a term that has a lot of meaning in HMIS, but also just as a general kind of concept here. Today, we're gonna be using this as that boundary that Abby describes for reporting purposes. So we're gonna talk about a spectrum of the way you might consider setting up your

11/20/19 Page 3 of 20

coordinated entry projects in HMIS, ranging from one extreme of setting up only that single coordinated entry project in HMIS. You have that really centralized system, everything goes through that one project, it really mirrors the way you set up your actual process for the clients to experience. There's one staff, they're in one building and they conduct, they do everything from that initial triage all the way to housing matching. Boy that would be such an ideal system for setting up a single project in your HMIS, and everything's just stored in there. Maybe that is true for you, but most likely you have something a little bit messier than that.

0:10:15 JB: And there's a whole spectrum of choices all the way to the other end of the other extreme, which is to have no coordinated entry project in your HMIS. Maybe you've got perfect coverage through your entire system and you can just collect those data elements in those other project types, and you have the capacity to run a report that looks across project types to get at the reporting needs that you need to be up to meet. We're gonna talk about both extremes and we're also gonna talk about a few examples that fall in between and the way you can be flexible in there. We'll also be talking about the actual data collection within the the project or many projects or complete lack of project [laughter] that you set up in your HMIS. This one is really important because I think, as Abby was saying, you guys have had a lot of time now to be working on processes and particularly around data collection that work for you, that meet various requirements that HUD has put out there that are functional for your system, and you're probably already collecting quite a bit of data. And so trying to layer the data requirements or the data standards requirements on top of that can look really different.

0:11:40 JB: It may be that you haven't gotten to a place yet where that, the specifics of where you're collecting the data and who's collecting the data, maybe you haven't gotten to a point where that's really working for you yet, and so the data standards can provide you with a good guidepost for setting that up. On the other end of the spectrum, you are already perfectly set, you know exactly what you guys wanna be doing, you can find those places where you're existing data collection matches what's kind of put out there in the data standards. And that might mean that you need to rename something that's in the data standards or describe it a little bit differently to folks in your community, or put it somewhere else in the process than where it appears in the data standards.

0:12:29 JB: As long as you can pull their data together in the way that the report, that the concept of reporting would need, that you can do it as if it's set up the way that it's set up in the data standards then that's fine. You can rename things, you can be flexible around that. You might also find that you have some things that are working really well for you, but the data standards give you a real opportunity to take a step back, kind of sit with what you've been doing for the last couple of years and check in on what's working and what isn't working, what might need a refresh for you. So, and the idea with the whole presentation that we're gonna be talking about today is that no matter where you fall on this continuum that you can be flexible and that, as Abby said, Abby's here to validate [laughter] that HUD wants you to be able to be flexible as you set these items up in your HMIS.

0:13:28 JB: And we'll talk a little bit more about some of those reporting expectations as we go through, and talk about what those boundaries look like. But as Abby said, we don't fully have those specs yet and we really recognize that that's a challenge to face right now. Alright, I'm gonna start off talking about that project setup. So, some things to think about here, kind of when you think about where your continuum might fall along this spectrum of sort of approaches to thinking about this is your system design itself, whether you have that No-Wrong-Door approach versus whether

11/20/19 Page 4 of 20

you have that centralized model. You're also gonna wanna think about your privacy and security needs in your HMIS. Do you have a closed system, an open system, is that something you need to start thinking about changing or evolving as you implement coordinated entry? And then you also wanna think about the reality of HMIS participation.

0:14:33 JB: So if you've got all of your street outreach projects and your shelters in your HMIS, and they're all already doing a whole bunch of data collection that puts you in a really different position around kind of where you're collecting those data than if you don't have a lot of coverage among those kind of front door projects. So let's start talking about a few examples of types of setups that fall along this spectrum. So on the one extreme as I mentioned before, you've got this, that you could set up a single coordinated entry project, all those coordinated entry specific data elements, 419, 420, that current living situation, they're all set up in there and they're all collected in there. And you could set that up so that any agency that participates in the coordinated entry process can access those client records and then add to them as a client kind of moves through your process. This enrollment that that client would then have would run alongside any other project enrollments they might have. So they might have a little engagement with street outreach, and then move into a shelter, and maybe move into another project. The coordinated entry project would be kind of running in the background alongside all of those other projects.

0:15:54 JB: And then this would set you up really nicely for running a really clear report around that single coordinated entry project. It would show you the active coordinated entry clients at any given point in time, it would show you that sort of longitudinal performance data. So over a period of time, how many folks you're serving. The boundary around the coordinated entry process is that project in HMIS. And so we see that here with that red line, and that'll carry through the other examples. So be super clean and easy, really straightforward. Again, if you have that really, the cleanest possible lines around how your process is working. But we know from talking to communities and just from experience that that's probably not exactly how all of your systems run, that's not really gonna necessarily work for everybody. Then there's the opposite extreme which would be to imagine a CoC that has a No-Wrong-Door model, and they have full HMIS participation among everyone who participates in coordinated entry activities at all.

0:17:12 JB: So they have Street Outreach, every Street Outreach provider is in HMIS. Every shelter, there's no mission shelters that are refusing to participate, anything like that, everything's in there. In this case, you could just add those data elements, 420 and 419, to these existing project types, to the ones in particular that are conducting any coordinated entry activities. Now, if you do, this is a perfectly fine way of setting things up as long as you are able to draw a boundary around the clients that are in the coordinated entry process. And by in we really mean that idea where they've been identified as folks who are homeless, they are experiencing a housing crisis, and they haven't yet moved into a permanent housing situation, either through a moving date in a project or through an exit destination to a permanent housing situation. You also need to be able to identify those clients who haven't been seen for a long period of time, and therefore aren't necessarily part of the system anymore. They might have moved out of the geography.

0:18:43 JB: So this process is a totally fine way to set up your system. It's a little more technically-challenging because of the need to look across project types, and really make a lot of decisions about who's in, who's out. And one of the things we talked about yesterday on the call was the idea of sort of potentially conflicting data points. So if one project says, the client is in one particular location, another project says they're in a different location, which one takes precedence in a

11/20/19 Page 5 of 20

reporting situation? So there's these challenges, but this is perfectly fine, because what you're able to do is report on clients as if they're set up in a single project in HMIS, which is really what the requirements in the data standards say, that you're able to report or produce output from the HMIS as if everything is set up according to the strict requirements in the data standards. And then there's really probably an infinite number of combinations of approaches that fall in between these two extremes on this spectrum. I'm gonna show you two types of examples, but you could... There's a whole bunch of examples that you could look at.

0:20:10 JB: So maybe you have a relatively structured centralized system, but you have... You are a balance of state, so you have 20 different highly structured centralized systems and they're not really connected to each other. People are unlikely to be using back and forth, it would be totally fine then to create multiple coordinated entry projects to accommodate those separations, and then you could run a report that looks across the entire implementation, if that's an important thing for hard reported requirement, but you could also run individual reports for each of those projects, so you are really understanding the sort of bottlenecks, and challenges and successes that you're having within those individual geographic areas, you might also, this might also work for you if you have a set up where you are really focused much more on the front door of the system, and you have a really separate system being even operated, by a different entity that focuses on the housing match and placement side of the system.

0:21:20 JB: Or maybe you just emphasize one or the other of those in your continuum. So kind of narrowing the focus of the coordinated entry project is a perfectly fine way to set this up as well. And/or you could set something up That is a lot like this. No coordinated entry project set up. But if you don't have full... HMIS participation among your street outreach projects or your emergency shelters, you could set up a coordinated entry project that can kind of run in the background To catch All of the data points that you can't collect in non-HMIS participating project. So in this case, there might be a coordinated entry management entity, maybe they host regular conference case conferencing meetings with street outreach shelter projects, if they were to then inform that management entity that they've seen a client, they have a contact with a client or they provided a client with an assessment, they could record that information here in that catch all project and then in that case, you need to be able to run the boundary all the way around all of the projects. So you are seeing the price data that's getting collected in the HMIS participating projects about assessments and about events, but you're also combining that with the data that is in this catch-all-coordinated entry project.

0:23:02 JB: So again, these are just examples of the types of projects and set-ups might that follow on this spectrum? There are probably more that you might wanna consider and you really wanna think carefully about what you have, what's really working for you right now, and then think about what you want. This is a real opportunity to say that this hasn't really been working for us in terms of data collection in these key areas. Here's an opportunity for us to really revisit, what is functional and working for us, we are gonna dive deeper into some of these examples by talking about where the data then gets collected in each of these projects. Set up example again here. I think the real key is the same kind of thing, like thinking about where you're already collecting data, either in HMIS where you are collecting data points that might look very similar to the requirements in HMIS and where you might need to rename things or re-conceptualize your sense of what the requirements are reframe the requirements into your own language, that is fine, you can change the names of things that are in the data standards to match.

11/20/19 Page 6 of 20

0:24:25 JB: What really is meaningful for you, in your COC might also wanna think about where you're collecting data outside of HMIS and you guys are probably already collecting tons and tons of data, especially those projects that aren't participating in HMIS... But are collecting tons of information about clients as they're doing assessments, you this process can just create a place in HMIS to store those data and then really you're gonna need to think carefully about how you work with your vendor to make any of this viable. That's gonna be a huge piece of this puzzle, as well. How much of this flexibility is available in the product that you're using? So I'm gonna dive into a few examples of, again, looking at those models that we talked about before where you actually collect the data and if you have a set-up that is consistent with those models. So, again, in that tidiest scenario that centralized model that covers crisis said referral through a basic triage process and then all of the content that happens after that is happening in a really centralized way.

0:25:52 JB: You are gonna collect all of those data points in that single project the triage piece is a question that has come up before around when you put a client into that coordinated entry project, what is the base level there is that if a client is indeed homeless on the street if you're asking them if they're experiencing a housing crisis, and they're literally, homeless right now, when you ask those 3.917 type questions, then that is the point at which they become someone who is a coordinated entry participant. So you would do the project entry 3.10, you would record that 3.917 that prior living situation, you would collect the 4.12, the current living situation and you would collect as many of these universal data elements as you can at that point of entry, where you recognize that they are in fact a coordinated entry participant.

0:26:57 JB: At the point of crisis assessment. If that's something that you do in your continuum, then you would collect that assessment data element there, and you would... That's the point at which the rest of the universal data elements, like all the data elements that you didn't collect right at that point of triage, that's the point where you wanna make sure you're collecting those. That crisis assessment becomes kind of like that trigger point for when data quality becomes really relevant. It's similar to the way the data engagement functions in the street outreach project. Then events would occur, like a crisis bed referral, maybe a problem solving conversation, and those would all get recorded using Data Element 4.20. Again, you might have a much deeper housing assessment at some point when it seems that the client isn't going to be able to self-resolve or resolve with that problem solving support And you might make a referral, again using that event data element, and at the point of move into some kind of permanent housing project, you would exit the client with the record of their destination. So 3.11 is exit and 3.12 is their destination.

0:28:23 JB: And then again, as we said before, that project, the entry, the event, and the exit really provides that boundary for reporting purposes. Now that's just one approach as we said before. So you might have a more complex system where multiple agent entities are doing the triage and assessment piece, you might have some outreach projects doing that as well as maybe a two-on-one triage model, you might have multiple emergency shelters doing a housing assessment combined with perhaps an entity that's just solely focused on doing those in-depth housing assessments. As long as you can give access to that one particular project to all of these entities you can still leave that set up as a single project in HMIS, if you want to. But again, you might have a much stricter process where that front door piece is really being handled in one way by one entity, and that housing match piece is really being handled in another way.

0:29:38 JB: So again, you would sort of set that up where that client flow through the beginning of the processes is in one project, the wrapping up piece is in another project, and then that boundary

11/20/19 Page 7 of 20

gets drawn around both of those projects for reporting purposes. Too far. You might also have a coordinated entry project for that front door and the housing match coordinated entry piece happens at that exit point, have that separate project, but that's all layered on top of some other project types that are really doing a lot of the work where you don't want them to have to flip back and forth between enrollment. So, one of the things we've heard a lot from when we've talked to continuums is that they don't wanna have a separate coordinated entry project because they don't want the outreach workers who are out doing a regular street outreach enrollment to have to open the client in street outreach, collect that current living situation data in the street outreach project enrollment, also create a coordinated entry project enrollment, and then have to flip back and forth when they record the assessment.

0:31:11 JB: So they'd have to go into the coordinated entry enrollment to record assessment for event information, but switch back to the outreach projects to collect the data that is required for that particular street outreach project, like current living situation or what used to be called contact, every time they have the contact. That makes a lot of sense. So for those street outreach projects that are already in HMIS, you could just add 4.19 and 4.20 to that project data collection process, and then that could run alongside a coordinated entry project that would allow you to have that catch-all place for non-participating projects. For data that the coordinated entry, structure itself, collects from those clients who are, from those clients who are interacting with projects that don't participate in each [0:32:14] _____ math. Again, this is tricky because in order for reporting to work, you need to be able to look across multiple project types. So not just the two coordinated entry projects merged together, but also looking at street outreach, looking across shelter enrollments where folks might be having problem-solving conversations or conducting those assessments, and then looking across permanent housing projects where you might see the referral or somebody being pulled off of a list for a match purpose, and then their move-in date, so that you could understand when they actually are done with that coordinated entry project.

0:32:57 JB: So that piece of drawing the boundary around those multiple projects can be really challenging, but if you can do that, then that becomes a really viable set up, that might work better for your continuum. Again, just a couple more examples. Your COC might not have so much of an in-depth assessment on the front end, that that's something that's happening more in a dispersed way, but really, you do have a really centralized process for that match piece that happens on the back end. That might be the place where you really wanna make sure you're setting up a separate coordinated entry project in HMIS to really focus on that match piece. That's fine. It's fine to be that, to have that kind of centralized approach for one facet of the system, but a more diffuse set up on the other side of the system.

0:34:01 JB: And again, this is pretty consistent with what we talked about, and it's like some data collection happening in that coordinated entry project for the non-participating projects and data collection happening within projects for the ones that are participating in HMIS. I wanna spend some time here because I think ultimately this might be just my assumption and my prejudice, but I do feel like this ultimately probably becomes a pretty common set up. I'm imagining that there is this kind of catch all project where you can put some data but that you might have a lot of data collection or coordinated entry purposes happening in the street outreach projects directly or in the emergency shelter projects directly.

0:34:56 JB: And I wanna pause on this slide and really talk about some of the data elements themselves, because we've gotten lots and lots of questions as we've talked to Continuum about how

11/20/19 Page 8 of 20

to collect these data. And so I mentioned earlier, this idea of current living situation, and how folks don't wanna flip back and forth to have to record data in a street outreach project as well as in a coordinated entry project. This is something we've heard about current living situation a lot, we really do not want you to do double data entry, so if you're already collecting a data point in, for example, a street outreach project like current living situation, you wouldn't... Even if you have a coordinated entry project that's running along side of it, don't also collect it there.

0:35:54 JB: The point is not to create new data collection requirements and more burden. The point is that somewhere in your system, you have a place to document where a client is currently living. And that data element gives you a lot more flexibility, too. I think in a lot of the unsheltered TA work that folks are doing, they've talked about wanting to keep track of where folks are staying when they're staying on the street, like some folks will stay in a particular encampment, just so that when their number comes up for permanent housing or when something else is happening, there's a real... There's a clear out way to locate them. And current living situation can serve that purpose. So, it's really helpful, as they're doing that street outreach, to be able to have a place to record that information.

0:36:46 JB: But if you're doing that street outreach, and you also do coordinated entry and data collection, you don't wanna have to be doing... You don't wanna have to be sort of duplicating the data entry in the coordinated entry project. The coordinated entry, the requirement to collect current living situation in the coordinated entry project, is it's there if you don't have a place to record that information somewhere else in HMIS. So if you've got a client who you haven't seen in 85 days, and your Continuum has decided that if you don't see a client for 90 days, then you're gonna go ahead and close them out of being in coordinated entry, then you'd wanna be able to run that report and say, "Oh here's the list of clients we haven't seen in 85 days. Has anyone in our Continuum seen them?" And in a case conferencing setting, a non HMIS participating provider might say, "Oh yes, I've seen that client." You can then use that current living situation in the coordinated entry project for the non-participating project to document that that client is still on the streets, still in need of assistance and keep them as an active client. So it's really there to serve that purpose. It's like a backup purpose in coordinated entry to record current living situation.

0:38:26 JB: I wanna pause there because I think I'm supposed to be pausing occasionally and I forgot to do that, too...

0:38:32 MS: [chuckle] It's okay. It's okay.

0:38:35 JB: If folks have a question. I do wanna talk about more of those data elements, but the data elements in particular, I know are things that get questioned a lot about.

0:38:44 MS: You're perfect. The question that's kinda hanging out there that we haven't provided an answer yet, and thought maybe could use some discussion is, it's one of those more straightforward ones, and you were just talking about current living situation, and how the intent here isn't to duplicate the same current living situation across multiple projects, that might know or be able to record that data. So the Gather question specifically is should, so can and should, [0:39:14] ____ can. Should projects other than SS... SLMPE be recording current living situations for clients? And I think it fits perfectly to be on this screen to think about the answering of that question. If an RH project is within the boundaries of your CE reporting and everybody can access that data, the RH project could be very well recording current living situations prior to housing kind of thing, or

11/20/19 Page 9 of 20

another non-participating project might know where the client is recording current living situation there. The answer is yes to that question, but it's the perfect time to stop and take a question. Anything else anyone else has seen that might serve some verbal discussion?

0:39:57 Meredith: There's another one that just came in about current living situation, whether it's required to complete... Whether one is required to complete a current living situation entry every time you enter something into 4.19 and 4.20.

0:39:57 JB: I think that would be a really good practice to do so. I think it depends a lot on your setup. If you have, if you're doing those assessments, the 4.19 assessments, in another project type that requires a current living situation, you're gonna do that anyway, because it's a contact, you are having a contact with that client. So I'm imagining a Street Outreach project would be doing that. And so you are required to collect a contact. Now, if you're doing that in a sort of stand-alone entity that does assessments and you aren't also collecting that somewhere else, because it's not a Street Outreach project, then yeah, you should definitely... The data standards do say that at the point of assessment you should collect a current living situation. Great time to check in, make sure you know where the client is living. It's also probably part of the assessment, you wanna know where the client is currently staying. So it makes logical sense that you would record that at that point in time. And Meredith, correct me if I'm wrong, it is required, I think, at that point in time anyway, so. Where you choose to record it though would depend on your projects.

0:41:46 Meredith: Yes, I think that is correct, that we can say it's required when those are updated.

0:41:54 JB: Okay, are there other things or should I move on to some of the other data elements and the kind of hot tips that we have for some of those data elements based on what we're hearing from the ground?

0:42:08 MS: On the current living situation topic Joshua is clarifying, "What about the limited response set versus the larger current living situation?" So, PATH providers really have that much limited set of options and everybody else who might be recording current living situation, those that are PATH funded might definitely have access to the larger list. So, I think he's just pointing out that it's depending on which list that you have access to, you may be missing some data. The PATH data set that they have access to is about recording a street situation, right? Whereas the larger current living situation could record more than that.

0:42:56 JB: That's a really great point. If you have a bunch of HMIS participate, all your CRH providers are HMIS participating, are really good about it, but they're all PATH projects. Do you wanna think about maybe also setting up the Coordinated Entry project that runs along the background so that you can be collecting some of that additional information or is that enough for your continuum? I think that really just depends on the kind of Street Outreach that you're doing and whether it's critically important for your community to know exactly, to have that option to really understand exactly where a client is staying, maybe some of those supplemental optional fields.

0:43:35 Meredith: And I would just plug in there too, that those are the minimum requirements for PATH, and I think is there a conversation that's happening with your PATH providers to expand data collection requirements or within your CoC to look at some other options? So I think I'm just echoing what Jules was saying, but look at some other options for your community as well.

11/20/19 Page 10 of 20

0:44:00 Speaker 5: And before we move on, I wanted to touch on Michael's question regarding the backup nature of 4.12. Is Jules saying that the CE project does not need to collect 4.12 as long as its own staff are making the contact or that the Verified By field is not required as long as the CE staff are making the contact?

0:44:23 JB: Okay, let me read the question, 'cause I feel like I got a little lost in that. Well, if the CE project is making a contact and it's a contact that is not going to be recorded in another project type, like they are not also a Street Outreach project and workers and recording it there then they do need to record that contact. If in a... You only need to use the Verified By field if it's coming to you, because in a case conferencing setting another entity or another person is telling you that they saw the client. So you only need to use that Verified By field if you're getting that information second-hand. So if you're a Street Outreach worker, and you're out there with the client, and you work for a Street Outreach project, and you do Coordinated Entry activity, you can just record 4.12 in your Street Outreach project. If you're a standalone Coordinated Entry entity and that's all you do, you don't also work for a Street Outreach project, then you would record that 4.12 in that Coordinated Entry project. If you're a standalone Coordinated Entry project, and you're hearing second-hand from another Street Outreach worker that they have seen the client, then you would record that in the Coordinated Entry project, and you would use the Verified By field.

0:46:00 JB: I'm gonna move on to some hot tips for some of these other data elements, and we'll circle back to lots of questions. I'm sure.

0:46:06 MS: Yep, thanks.

0:46:11 JB: Okay, let's talk about assessments because this is something else we've talked to folks about on the ground, and we've heard quite a bit of feedback on. So here data collection in an assessment can be pretty minimal. The data standards kind of require that you tell us the date that you conducted the assessment, the results of the assessment, which can be defined however your continuum defines it. That can be a number, it can be a letter grade, it could be a thumbs up, thumbs down, whatever your result is, whatever that looks like, that can be the response that you record in that data field. And then you also wanna record the third thing, which is the status on the priority list. So, for some folks all of those things happen at the same time, you do the assessment, you have a date, you get a result, and that result tells you the status on the priority list. And so kind of the.

0:47:16 JB: The flow associated with that data element makes sense. For other folks it's more disconnected than that. You maybe get a result and you're either on or off the list, or you get a result but you're now ranked in some kind of priority order or you, anyone who gets a result of any kind is on the list, but their score is or whatever is so low on the list, that they effectively aren't really going to come up, but they're still on the list. In other communities, you have to meet a threshold in order to be put on the list. All of those things are fine as long as there's consistency, in the way that you implement it and it's really clear for you guys what being on and off that list, actually mean.

0:48:09 JB: So that might mean that you need to rename that data field or you might need to even move it and put it in a different place sort of connected to another activity that you do, that's fine, as long as you can sort of pin point where in your process that a person can be identified as being on or off your housing priority list or your front door priority list, depending on which assessment you're working on, then that's fine, you can do that, you can rename things, you can move it around, it

11/20/19 Page 11 of 20

doesn't all have to be connected in exactly the way that the data element is described.

0:48:50 JB: You also can collect a lot more data in that data element if you want to. You just have to record the results in the data element, that's all HUD is gonna be working at, but you could use that process to ask the individual questions that are in your assessment, record the individual responses to every single assessment, if that's something that works well for your CFB. And then last, I'm gonna talk about events there are 4.20... 4.20, these all get recorded whenever they happen. There's some data fields upfront, that response categories up front that give you the option of recording referrals to prevention projects or to diversion projects, those are available if you do record data about folks who don't necessarily enter into the coordinated entry system, the sort of in the coordinated entry bucket directly, you don't have to use those if you do wanna be much more strict about how you define who is in or out of your coordinated entry process.

0:50:13 JB: You can use that to record the problem-solving conversations that you have. One question that's come up around problem solving in particular is the question of sort of what if you conduct multiple problem solving conversations or, and multiple entities conduct to those problem solving conversation. You leave an event open as a single problem solving conversation over the course of a client's enrollment and maybe revisit that multiple times or do you create multiple events every single time you have a problem-solving conversation. In talking about it we're really kind of seeming to land on the side of creating multiple events for every single conversation that you have, this gives you a lot better sense of who is having those conversations with clients, what entity is having conversations with clients, and how many of those conversations you're having. One thing that makes it a little more challenging is that then you're expected to record the disposition of the client based on that problem solving conversation which might mean revisiting multiple event records, but from a reporting perspective, if you have a subsequent problem-solving conversation, it's fine to assume that the previous problem-solving conversation didn't result in a stable housing replacement. So you don't have to go back and revisit those every single time.

0:51:52 JB: Another thing that's come up in this data element is the referral process. So referral is a word that is used that imply a sort of an active push of a client out to something else. So you are actively sending a client to another project. Maybe we could have used a different word there to imply more flexibility, but whatever, we accept that got used. It should also be interpreted to encompass the concept of a pull approach. So if you have a set up where the permanent housing project, just pulls the next three people who are eligible off the list and makes an offer of housing to those people and then whoever fits the best is the one who gets that spot, that also should be considered a referral.

0:52:56 JB: And again, you might need to rename that field, you might call that "offer of housing", or "housing match made". There's lots of different ways to label that concept and you can change that if that works better for you. It should still capture that moment when the client, when there's... It kind of mirrors what the acceptance date is in a permanent housing project, so there's a vacancy that's available, the client meets sort of basic eligibility criteria and they're the one who is being offered that housing or they're one of a few who are being offered that housing. I think that's all I had to say about my hot tips for the data elements. Are there other questions that have come in that we should address right now?

0:53:57 MS: I'm looking... We have been pretty seriously answering questions that have come in, so that's good. Things are getting sent out. So definitely be reading the side bar of previously asked

11/20/19 Page 12 of 20

and answered questions. I had a couple of questions...

0:54:22 AM: Mary what do you think about looking at the questions about prevention.

[overlapping conversation]

0:54:27 MS: I was just gonna say that Abby, great minds think alike. We've had a couple of questions come in about homelessness prevention projects and where they fit in 'cause we haven't really put them on the screens as a specific project type to think about here in any of our green sections, but definitely part of the process ESD funding, that ESD funding that goes into homelessness prevention, and some VA funds of course. So the general question Jules, do we need to have our HP projects set up doing their own data collection, using coordinated entry data elements and not try and overlap that I guess with the core data entry project setup we're looking at here.

0:55:25 JB: Well I'm gonna let Abby field this one, because she handled it so beautifully yesterday when it came up.

0:55:31 AM: I did?

0:55:33 JB: Look at her eyebrows she does. [laughter]

0:55:37 AM: I may or may not...

0:55:37 JB: Well okay I can...

0:55:37 AM: Have been drafting a response to another question, sorry.

0:55:41 JB: Totally totally fine. I know we're all kind of multi-tasking here as we try to field your questions in writing and verbally. Okay, so I kind of addressed that. There's this notion that you only really have to look at clients who are literally you enter clients into coordinated entry at the point that you know that they're literally homeless, or having a housing crisis. But you certainly can explore the notion of making it, of collecting a lot more data about those housing prevention referrals that you might be making and including everyone that you triage in the data collection process and then being able to distinguish using 3.917, which one for reporting purposes, in which ones are the ones who are in that coordinated entry boundary, but still collecting data about those folks who are asking for assistance or who are very close to needing to be in that coordinated entry process, but who get diverted or prevented. And that's a great... And it's an opportunity to collect all that data so certainly there's no harm in it. So I'll let you pick up from there Abby.

0:57:02 AM: Thank you. So I think I wanna go back a little bit further just to give a little bit of HUD's intention when we were writing the original notice that required, that set the requirements for coordinated entry. So we did require all COC and ESG funded projects to participate and for ESG obviously that can pick up prevention, but we debated a lot the merits of whether you would want to incorporate all of a community's prevention or all of the prevention available within a COCs geography into a coordinated entry. And there are pros and cons and honestly, it depends on how you're set up and whether the prevention programs that you may work with, the ones that aren't ESG funded, whether they actually want to, whether they wanna prioritize. A lot of places just do

11/20/19 Page 13 of 20

first come, first serve.

0:58:02 AM: I think one of the pushes for including prevention is that it does then allow for you to start thinking about prioritization. So that's just a bit of the policy context, but then in terms of the data elements themselves, in the coordinated entry event up at the top, we have the referred to prevention assistance, and that's meant to just simply trigger counts of prevention referrals at that point. And so folks that are showing up to access points, that aren't literally category one, or for homeless that there will be a count there of referrals but they're not necessarily being counted in as homeless. So when we would report or when you would report we would be able to separate prevention and people who are literally homeless. Did I just make that more confusing? Okay.

0:59:14 MS: Not at all. I was trying to type while you talked so that we could document that answer. Just love that. Okay, any other, folks are saying kind of scrolling through I think there's one [0:59:32] _____.

0:59:32 JB: I see a question from Tracy, "What is the expectation for a client who goes into CE, gets into a permanent housing project, gets closed out of CE, but then ended up homeless over and over and over again, do you keep putting them into coordinated entry? So this is, there's a data side to this question and then there's a policy side to this question. So I think the data side is sure, yeah, every time they come in and you put in, enroll 'em, start for process all over again. But I don't know, Abby do you wanna sort of talk about the larger implications of how you serve that person?

1:00:20 AM: Yes, and that's actually the question that I was working on. So you would continue. So, I wanna reframe the question because it says "would you continue to enter somebody into the project?" and just in the spirit of trying to get out of talking about CE just as a project in HMS I would say, if somebody is permanently housed and then they show back up to an access point that you would continue to collect the coordinated entry data elements in whatever way you're doing that in your system and that you would continue to then collect those no matter how many times they moved through, but in terms of larger implications, and why you would wanna do that, if you are seeing people who are churning is the only word I can think of, like churning through the system over and over again and there's a, what we think is a permanent exit, and then it turns out, not so permanent and two weeks later somebody's coming back, that those hits on the system like those recording 4.19 and 4.20 over and over again those become data points that you can use to understand where maybe parts of your system are not working or people are falling through the cracks. So just to keep beating that drum that these data points are going to become the data points over time, that allow you to evaluate how well your process is working, and where you can focus improvements on. Jules, anything you'd add to that?

1:02:13 JB: No, that sounds great. And thank you for that clarification. Yeah, when I say the data collection side of course... Yes, you'll re-involve them, but yes, where you are collecting data in the appropriate way for sure. And I think that piece about remembering why we're collecting all these data in the first place to get to that point of being able to prepare a an active list to be able to prepare a who's about to fall off the, who's the list of people we haven't seen in X number of days. And then being able to do that kind of, that performance reporting over time is just so critical. So I think that's the piece where when you have those kinds of questions, like well, how will that serve us if we can look back over a client's experience to understand more about how our system is functioning and who it's functioning for is a really critical lens to look at those things through.

11/20/19 Page 14 of 20

1:03:24 JB: Keisha, should we address Keisha's question what's happening at the point problem solving versus housing assessments, I mean that's almost like a bigger question than this particular webinar is focused on, but it's a great question and the way I have really, I've struggled for a long time with what problem solving is, isn't this all problem solving? [chuckle] So I think it might be a good opportunity just to talk a little bit about what that problem-solving philosophy is and how it's different from all the other kind of interactions, we already have with clients. I think that...

1:04:19 AM: Did you say my name? Man!

[chuckle]

1:04:21 JB: I didn't say anyone's name, but I think it might be you.

1:04:24 AM: Okay, I could feel your eyeballs burning into head. And the question is problem solving, like what do we mean by that?

1:04:37 JB: How is it different from a housing assessment or frankly anything else that we do with client? Yeah.

1:04:45 AM: Yeah, Yep so, I'm gonna try not to tie myself in verbal knots as I describe this. For a while, we have had a concept of diversion that's been the term that has been used out in the world and it has tended to mean when people show up to the front door. Front door of a shelter that if they actually have existing supports that they can rely on and not have to go into the crisis response system, that is a good and that we should do that. And so that has been a diversion, historically, that's how we've talked about it, but as diversion has evolved and more people have been doing it they've also been finding that, based on our national data, we know that overexert of people who come to shelter, self-resolve using one to seven days of shelter which is not very much and it means there's something.

1:06:02 AM: It was a respite or they just, they just needed the short period of time, before they could go back to some existing support network or housing of their own. And so people have started to bring this idea of diversion, which was at the front door and bring it inside the shelter. And say we can continue to have these conversations with people to try to get them to resolve more quickly, either raise the percentage of people who are able to resolve at a shelter quickly or shrink a number of days. And so that has just introduced a lot of... Well, what do we call that? And diversions only up to the front door. And so we started calling that rapid exit. But really, I say all of this to say we are using a blanket term of housing problem solving, to describe those activities that we conduct with people whether they are literally homeless in a shelter, whether they're literally homeless, on the street or in a car, some other place not meant for human habitation or whether they're showing up to the shelter door and they weren't homeless the night before, but they would be tonight if they didn't get their immediate housing crisis solved that day.

1:07:23 AM: And so we're calling all of that housing problem solving And I will say there's still a lot of confusion out there and we have a lot of things to clarify, and maybe some of it doesn't need to be clarified, but I think a lot of the questions that people have are, "Well when can you use HUD-funded programs for it? And when can you not?" And we have been working on some of that policy language, but I hope that general description clarifies a little bit and doesn't confuse more. The idea is that you're trying to help somebody exit the Crisis Response System with back to a location, or to

11/20/19 Page 15 of 20

a new location that isn't necessarily a HUD-funded subsidy.

1:08:19 JB: I've also been really intrigued and this is not the place for the conversation, but I've also been really intrigued about how it plays more into the notion of client choice, and sort of trying to articulate with the client, what their actual ideal living situation looks like so much of... Anyway it's just been very interesting to get more immersed in the philosophy of it.

1:08:43 AM: And I can also respond to Shanna, Shanna's question that came in, Mary I think you have it, but it's asking input or guidance about data tracking for diversion. That there are folks that are pushing back about capturing diversion data in HMIS, because they're used to only capturing it on clients that are receiving housing shelters support services. So I can talk about the value of collecting for diversion and it's quite similar to what I was saying earlier about people who are churning through the system, who are exiting to a site that we thought was permanent, but maybe it isn't. That when you... If you're not collecting on people who are being diverted, you will never know how many or what percent are showing back up to an access point with the housing crisis again. There's just no way to ever do any better strategy or targeting at the front end of your system. And I think historically, diversion programs or even prevention programs may have measured their success by saying 100% of people didn't go into the system.

1:10:00 AM: But that's effectiveness, that's not efficiency. Efficiency metrics are looking at how many people in the absence of getting that intervention would have gone into the system. And so, if you're not tracking diversion metrics, if you're not tracking who is showing up and who is having a conversation and going somewhere safe, that is not the shelter system, you're never gonna be able to know what your efficiency on that is, and whether you're actually reducing inflow or whether you're spending that time or maybe those one-time limited financial resources, on people who wouldn't otherwise become homeless. There's my pitch.

1:10:50 MS: That's a good pitch.

1:10:51 JB: It would be good to just... Kelly's question was answered, but I do think it's good to call attention to her question, which was, I don't think I fully grasp how an exit in coordinated entry project, occurs. Can you clarify this? I understand the points at which an individual would enter, but what triggers an exit from the project? I didn't really emphasize that enough probably. So do you just wanna call attention to that? That that would really be tied if you were looking across multiple project types for recording purposes, you would tie that to a move-in date in a permanent housing project that would really represent an exit from the system. You could also, if you know the client moved into some other kind of living situation, a permanent living situation that isn't reflected elsewhere in HMIS, then you would collect, you would exit them, you would do a project exit date and collect the destination for them.

1:11:56 MS: And there's more information in the HMIS manual, there's a whole section in the intro section of the manual that provides a whole bunch of extra further guidance around the exit and that would be good to review. So Abby you wanna take Kimberly's question back to the diversion what is the project type or diversion?

1:12:23 AM: So Kimberly's asking what component type folks are using for diversion and I just wanna address it head on, 'cause I think this is something that we hear a lot of. I think the clearest way to say it, is diversion is not a project, diversion is not a component type, it is not a program, it's

11/20/19 Page 16 of 20

not a funded program, it's not like rapid re-housing prevention. It's an orientation that we believe should be system-wide so that at any point in the system, if you have a no wrong door and you have 15 access points where people are showing up and some of those are shelters and there's a 211 that at every one of those access points before you start figuring out how to get people into the Crisis Response System, you should first be figuring out if there is a safe alternative that they can go to. And if there isn't, then, then you have the next conversation. But I think if I can read a little bit further into the what component type the question that we often get is, "Well then how do we get credit for what we're doing?"

1:13:17 AM: And I think the credit comes with using the coordinated entry event element where there is a problem-solving conversation was had that every time that event is triggered and then there's a dependent on that, which is, "Did that person find safe housing or not?" That there's your credit? So every time that event gets clicked and then that dependent is filled out, Yes/No, then you're starting to collect the information on how well your diversion is working.

1:14:21 MS: Okay, so does HUD see... Abby this is for you, does HUD see a difference between COC why coordinated entry and generating and by-name lists? And if so what is the difference?

1:14:35 AM: So, generating a by-name list is something that... So a coordinated entry process is a system-wide process that is meant to provide open access to all programs that are participating in the coordinated entry. You have to be able to access those, you have to be assessed in a standardized manner that allows the COC or whoever is operating the coordinated entry to then prioritize people and then based on those prioritizations, that referrals get made, starting with those that have higher priority, than others. And all of that is coordinated entry. So a by-name list is a tool that you may use in your community to manage who is homeless at any given point in time. I would also point out by-name list is not the same as a priority list. A priority list is generally a subset of a by-name. So you may be able at a point in time to understand who all is homeless in your community, because you have a by-name list but not everybody is prioritized for housing resources.

1:16:00 AM: And so, that priority list is more about who are the highest priority that we're going to focus on getting housed. And then the question that opens up is, well what are we doing for people who are not prioritized for housing resources that are funded, we are engaging in problem solving, we are referring them to mainstream systems, trying to get them signed up for benefits, all of the other things that are going to help people end an episode of homelessness. Anything you all would add?

1:16:38 MS: I agree. Okay, I am seeing a few more that are assigned to you, but I think probably it's answers that are in process Abby, so maybe letting you focus on that instead of having to talk for a little bit. So let's look and see if there's anything, we are posting the answers, if anything has been brought up on the call verbally, just so folks know we are not also typing in the answer and sending it out publicly. So again, this video will be available to watch later and we will release the Q and A of the things that got written responses, and then there will be some verbal responses that were provided during the webinar. Anybody else see anything important, critical, interesting from the questions that have either been answered or the few that are remaining unanswered right now to bring up?

1:17:54 Meredith: I think they're important questions that are sitting unanswered, which is why they're not answered yet. That we haven't been able to figure out a response to. So I just wanna say,

11/20/19 Page 17 of 20

we are still working on some of those responses, but if you don't get a response and you want to pursue that question, please submit an AAQ but we are working on them if you've submitted something.

1:18:19 JB: The question that is Gather's question about hard, clients that are deemed hard to work with by a permanent housing project. So you made the referral, and then the client as far as you know, according to the permanent housing project, the client rejected the housing. You can doc... How much CE dat should be collected about that person? Presumably, you've been collecting the data about that person up until they got to that point where they didn't wanna be housed in this particular unit. I don't, Abby I don't know if you want some COC do have thresholds for a number of times a person can sort of refuse.

1:19:23 AM: Yeah, so we actually... This is walking the line between honoring client choice and not abandoning somebody. So there are some COCs that have said, "Well we wanna set a threshold that the third time they refuse the housing unit, then they go to the bottom of the list." We would not be in support of that. Because that is essentially moving to the bottom of lists. Now, it depends on which list you're talking about, if it's a by-name list that person is never gonna get offered housing, again, quite likely. If it's a priority list and you have say, 20 people on it and you wanna say, "Okay we need to pause, we're gonna work with the top 10," then that's fine, but at no point should somebody be written off as too hard to work with. I think one of the unintended consequences that folks have had with the concept of prioritization that we're just learning, we're all learning in this, I will say that, is that they felt like, "Okay, if we have a list of 20 people, and one person is labeled number one, and it goes all the way down through to 20, we have to serve number one, before we talk to number two." And what we've been trying to guide people towards is, instead of doing that, if you can look at, for instance how many...

1:20:56 AM: How many permanent housing placements you make a month across the whole COC. Or if you're a big COC, if you're doing it in sub-regions, but how many you do a month or every two months, and then have a priority list that's more like a pool than a list. So if you can serve, if you can place 10 people a month, then take the top 10 people on your list and work with all of them, not just the first, and then the second, and then the third, because that being super strict and moving through that countdown, is creating a bottleneck that is actually making length of time homeless much longer. I will say one last thing...

1:21:49 JB: [1:21:49] ____ circle around to that.

1:21:49 AM: Yeah, I'm just re-reading Gather's question. They're collecting a document that they're refusing housing assistance, that would not be the same as three strikes and you're out, you're off the list. If somebody is wanting to be left alone and this is a way to say, to say, "Okay, this is not the housing provider's fault, this is a client choice to not take this unit." I think that makes sense to use that kind of documentation. It kind of depends on how you're interacting with your permanent housing providers, but that seems like it would be a good way to collect documentation, if you're looking at, for instance, provider, referral rejections. I'll stop talking now.

1:22:50 JB: I was just gonna add that that does loop back to that problem-solving conversation and the notion that that problem-solving happens over and over again, like so what is that person clearly moving into a HUD-operated, formal, but like that's not what's gonna work for that client. So what is that client's vision for their life?

11/20/19 Page 18 of 20

- **1:23:20 JB:** I think there is that one last question that would be kind of a nice wrap-up question. This is for Abby and it might be a little too pointed, a little too on the spot but Sara D. Wants to know, "can we get even a rough estimate of when the APR specs might be released and sort of what that actually, what that timing looks like and what that process might look like. Abby?
- **1:23:47 AM:** So Meredith, I'm not going to put you on the spot, I'm not gonna turn to you, but just don't shoot lightning bolts at me if I say yes, before April 1st.
- **1:24:01 Meredith:** I feel pretty good about that. Yeah.
- 1:24:07 AM: Yes, before April 1st. And we're shooting for way sooner than that, but yes, by then.
- **1:24:14 JB:** And Abby, can you talk a little bit about the scope of what those specs might pull in? Like is it, what's it gonna look like?
- 1:24:24 AM: Meaning what are we asking people to report on?
- **1:24:30 JB:** Yeah, are we maybe gonna try and figure out ways to help people look at multiple project types as we...
- **1:24:38 AM:** Yes, so that is the delay here is that we are trying to figure out... So all of these different types of setups that Jules spent perfect, perfect descriptions of... It's complicated to figure out how to do this type of reporting and it's not the type of APR that we've done before, so because we're trying to tackle this, one in a responsive way to the different setups that exist out there, but two, also still be able to get what we need and to be able to create specs that aren't just useful for us, but are useful for you. I know APRs are used for different things. So this is basically a system-wide APR for us to be able to do it this way, because we need to pull across multiple projects and that's gonna take a minute to figure out.
- 1:25:46 Meredith: And I think saying that, too, it's taking a minute to figure out with HUD and we know that vendors are gonna need some time to do it also. So, I hate being so, I know HUD does too, so coy about a timeline, but we also don't wanna miss another timeline. We wanna commit to doing it right the first time, because it is different than other reports that have been generated, so we're working very closely, meeting regularly with HUD to get the development under way of the specifications and get it wrapped up sooner than later. So it is not gonna be something that is sprung on vendors in June or July and expect it to go live in October. We really... Everyone is trying to get these out as quickly as possible.
- 1:26:40 MS: So, that is the right note to end on, Jules, thanks. If your questions have not yet been answered, please submit a HMICAQ for them. We also have them all recorded. We have this webinar recorded, we will post the slides, all of that will go through the HUB, so make sure you're signed up for that if you're not already. We'll have office hours on December 18th. It's gonna be a follow-up to these two calls we had yesterday and today. [1:27:10] _____ make an announcement about that on the HUB. We anticipate that that will be mostly a discussion like this, Q and A. There won't be a lot of content to present, but we will have more of these kinds of conversations and, of course, we will continue to publish written guidance, including APR specs whenever they are ready, and call attention to those for you through the HUD listserve. So I just wanna say thanks again to

11/20/19 Page 19 of 20

CE Affinity Group meeting 11.20.19

Jules for the heavy lift on the content today, Bryan and Abby and Meredith answering questions, and we look forward to talking to you on December 18th, and have a nice holiday next week.

1:28:00 JB: Thanks.

11/20/19 Page 20 of 20