

Homeless Management Information System (HMIS) for State ESG Program Recipients

The McKinney-Vento Homeless Assistance Act requires that all Continuums of Care (CoCs) maintain a Homeless Management Information System with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. The Act also requires Emergency Solutions Grants (ESG) Program and CoC Program recipients/subrecipients to participate in the HMIS. There are HMIS privacy, security and data standard requirements that all participating recipients/subrecipients must follow. The CoC may set additional requirements beyond what is required and these can be found in the community's HMIS Policies and Procedures. HMIS implementations can encompass geographic areas ranging from a single city to an entire state.

HMIS DATA STANDARDS

Effective October 1, 2017, the <u>2017 HMIS Data Standards</u> provide requirements for the programming and use of all HMIS systems and comparable database systems. These data collection requirements assist jurisdictions in completing the homeless reporting sections of the Consolidated Plan and ESG Program recipients in meeting annual performance reporting requirements. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

USES OF HMIS DATA

CoCs use their HMIS at the local level to, among other things:

- Collect client-level data and data on the provision of housing and services to homeless individuals, families, and youth and to persons at risk of homelessness;
- Produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs;
- Use to facilitate their coordinated entry process;
- Meet HUD's reporting requirements; and
- Measure performance of projects within the CoC.

SPECIAL CONSIDERATIONS FOR VICTIM SERVICES PROVIDERS

ESG Program and CoC Program recipients/subrecipients that are victim services providers, as defined by the McKinney-Vento Homeless Assistance Act, are prohibited from entering client-level data into an HMIS, but must use a comparable database. Legal services providers that can document that entering client-level data would violate client-attorney privilege also may be permitted to instead use a "comparable database."

ESG Program and CoC Program funds may be used to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. To be truly comparable, it must be a relational database that meets all HMIS data standards and the minimum standards of HMIS privacy and security requirements. It also must be able to produce the .csv files required to submit HUD reports. It is the CoC's responsibility to work with the HMIS Lead to determine whether an alternative system qualifies as a comparable database. This means that the CoC must document that the alternative system meets all HUD system requirements.

ESG AND HMIS PARTICIPATION AND DATA COLLECTION REQUIREMENTS

The ESG Program interim rule requires recipients/subrecipients to ensure ESG-funded projects participate in the applicable HMIS and the applicable coordinated entry system for the geographic area in which the projects are located.

All ESG Program recipients/subrecipients are required to collect the Universal Data Elements and a select number of Program-Specific Data Elements, shown below for each program component:

3.1 Name 3.10 Project Entry Date 3.2 Social Security Number 3.11 Project Exit Date

3.3 Date of Birth 3.12 Destination

3.4 Race 3.15 Relationship to Head of Household

3.5 Ethnicity 3.16 Client Location

3.6 Gender 3.20 Housing Move-in Date

3.7 Veteran Status 3.917 Living Situation

3.8 Disabling Condition

PROGRAM-SPECIFIC COMPONENTS AND PROJECT TYPES

Component	Project Type #	Project Type Name	
Emergency Shelter (operating and/or essential services)	1	Emergency Shelter	
Homelessness Prevention	12	Homelessness Prevention	
Rapid Re-Housing	13	Permanent Housing (Rapid Re-Housing)	
Street Outreach	4	Street Outreach	

PROGRAM-SPECIFIC COLLECTION REQUIREMENTS

The elements shown in the chart below are data collected by most projects funded by one of the federal partners. The chart indicates which elements are required for collection for each of the ESG component types. ESG projects must collect data according to the chart below in order to generate the CSV-CAPER Report. HMIS systems collect additional data elements for other programs such as the CoC Program and at the discretion of local program administrators.

Data Element #	Element	Emergency Shelter (entry/ exit)	Emergency Shelter (night- by-night)	Homeless ness Prevention	Rapid Re-Housing	Street Outreach
UDE	All Universal Data Elements	Х	Х	Х	Х	X
4.2	Income and Sources	X		Х	X	X
4.3	Non-Cash Benefits	Х		Х	X	X
4.4	Health Insurance	Х		Х	Х	X
4.5	Physical Disability	X	Х	Х	X	X
4.6	Developmental Disability	Х	Х	Х	Х	Х
4.7	Chronic Health Condition	Х	Х	Х	Х	Х
4.8	HIV/AIDS	Х	Х	Х	Х	Х
4.9	Mental Health Problem	X	Х	Х	Х	X
4.10	Substance Abuse	X	Х	Х	X	X
4.11	Domestic Violence	X	Х	Х	X	X
4.12	Contact		X			X
4.13	Date of Engagement		Х			X
4.14E	Bed=Night Date		Х			
4.18	Housing Assessment Disposition	CA	CA	CA	CA	CA
4.19	Housing Assessment at Exit			Х		

Key: X=data collection is required. CA=data collection is determined by how the CoC has structured the coordinated assessment in its area. Collection of the element would be required for any project that is conducting a coordinated assessment. This collection might be across multiple projects or sited in a central access point or coordinated intake center.

UPDATED ESG REPORTING REQUIREMENTS

- Beginning in October 2017, ESG recipients must report aggregated ESG Program information at the subrecipient level, using Sage. The Sage report replaces the ESG-CAPER Annual Reporting Tool (eCart).
- Subrecipients should have been provided additional instructions on the submission of a CSV-CAPER Report generated from their HMIS or comparable database by their ESG recipient(s).

A project-level CSV-CAPER Report is required to be submitted (by the subrecipient) to each ESG recipient that funded the project, using the data range specified by the recipient.

ELIGIBLE HMIS COSTS UNDER ESG PROGRAM

Per 24 CFR 576.107, recipients/subrecipients may use ESG Program funds to pay the costs of contributing data to the HMIS designated by the CoC for the geographic area, including:

- 1. Hardware and software costs:
 - o purchasing or leasing computer hardware;
 - o purchasing software or software licenses; and
 - o purchasing or leasing equipment, including telephones, faxes, and furniture.
- 2. Training and overhead:
 - o obtaining technical support;
 - o leasing office space;
 - o costs of utilities and high-speed data transmission necessary to operate or contribute data to the HMIS;
 - o staff travel costs to attend HUD-sponsored and HUD-approved HMIS training;
 - o staff travel costs to conduct intake; and
 - o participation fees charged by the HMIS Lead, as defined in 24 CFR 580.3, if the recipient/subrecipient is not the HMIS Lead.
- 3. Staffing:
 - o completing data entry;
 - o monitoring and reviewing data quality;
 - o completing data analysis;
 - o reporting to the HMIS Lead;
 - o training staff on using the HMIS; and
 - o implementing and complying with HMIS requirements.
- 4. Comparable database:
 - o For use by recipients/subrecipients that are victim services or authorized legal services providers.

ADDITIONAL ELIGIBLE COSTS FOR RECIPIENTS THAT ARE ALSO THE HMIS LEAD AGENCY

If the ESG recipient is also the HMIS Lead Agency, as designated by the CoC in HUD's most recent fiscal year CoC Homeless Assistance Grants Competition, ESG funds may be used to cover additional costs, as shown below. In addition, a state ESG recipient designated as the HMIS Lead Agency may retain ESG funds to carry out the activities shown below along with funds for administrative activities, but must subgrant the remaining funds.

HMIS operating costs for HMIS Lead Agencies, per 24 CFR part 576.107(a)(2):

- Hosting and maintaining HMIS software or data.
- Backing up, recovering, or repairing HMIS software or data.
- Upgrading, customizing, and enhancing the HMIS.
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems.
- Administering the HMIS system.
- Reporting to providers, the CoC, and HUD.
- Conducting training on using the HMIS system or a comparable database, including travel to participate in training.

HMIS RECORD KEEPING AND REPORTING REQUIREMENTS

ESG Program recipients/subrecipients must establish and implement written policies and procedures to ensure that ESG funds are used in accordance with the requirements, including maintaining records of participation in HMIS or a comparable database by all projects of the recipients/subrecipients.

HMIS administrators must maintain the confidentiality of personally identifiable information collected and maintained in the HMIS.

ADDITIONAL RESOURCES

ESG Program HMIS Manual

CoC APR and ESG CAPER HMIS Programming Specifications

<u>CoC HMIS Data Collection Template – Street Outreach, Emergency Shelter, and Safe Haven Projects</u>

Supplement

HMIS Data Standards Manual

HMIS Data Dictionary

HMIS Data Quality Monitoring Toolkit