



CoC/VSP Comparable Database Responsibilities

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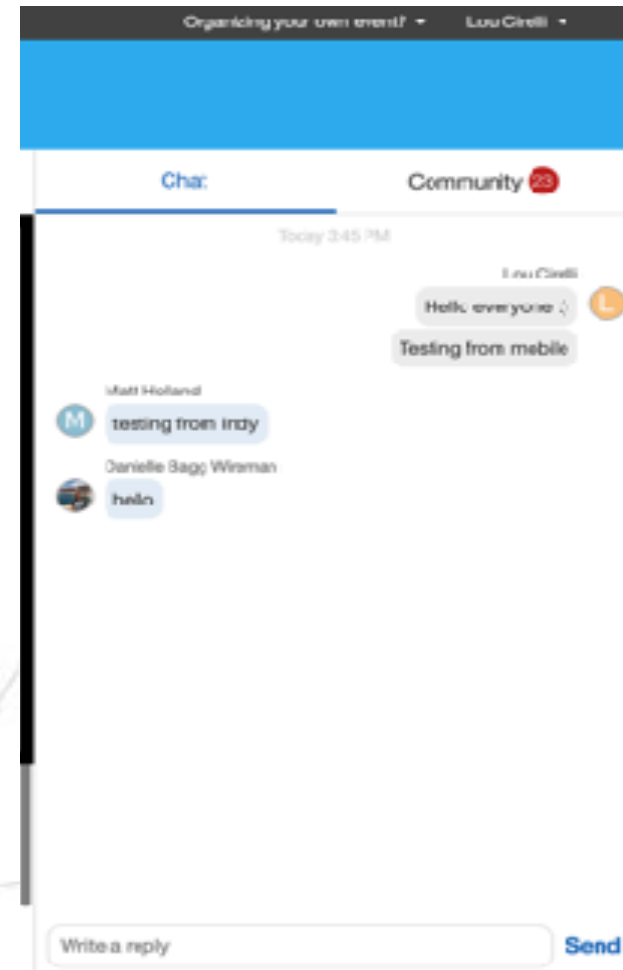


Webinar Instructions

- Webinar will last about 60 minutes
- Participants in 'listen only' mode
- Submit questions in Question and Answer box on right side of screen
- Webinar audio is provided through your computer speakers
- For technical issues, request assistance through the Question and Answer box
- Access to recorded version
- NHSDC will send you an evaluation after the session; please respond!

Questions During This Session

- Please submit your content related questions via the Q&A box
- Send to Host, Presenter and Panelists



Welcome & Introductions

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

Welcome & Introductions

Common Ground:

- The goal for all persons experiencing homelessness is safety and getting the person/family housed.
- Safety with survivors is our number one goal around housing.

We are so glad you have joined us today.

Please share your name, role and one thing you would like to learn in the chat box.

Learning Objectives

In this session you will learn:

- HUD's minimum standards for comparable databases
- Continuums of Care (CoC) and Victim Service Providers (VSP) responsibilities
- Support for CoCs and VSPs working together to ensure compliance
- Basic considerations for contract management-procurement, execution, monitoring

McKinney-Vento Act Requirements

The McKinney-Vento Act, as amended by the HEARTH Act, defines a “victim service provider (VSP)” as 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.

VSP is a designation at the agency level, not the project level.

Project recipients and subrecipients of Continuum of Care (CoC) and Emergency Solutions Grant (ESG) projects must use the HMIS to collect client-level data. However, VSPs must use a comparable database to collect client-level data for their HUD projects.

VAWA and Other Legal Considerations

Regardless of an agency's status as a VSP under HEARTH, VSPs cannot use HMIS if they receive and use funding agency-wide from:

- Office of Violence Against Women (OVW);
- Office for Victims of Crime (OVC); or
- Family-Violence Prevention and Services Act (FVPSA)

Victim Service Providers (VSP) are prohibited by VAWA law from entering Personal Protected Information (PPI) into a Homeless Management Information System (HMIS).

Defining Comparable Databases

Comparable databases are software applications:

- Identical to HMIS but used by a single Victim Service Provider instead of a group of service providers
- Must produce federal HUD reports - ESG CAPER and CoC APR reports that can be uploaded to the SAGE repository
- Must be current with HMIS Data Standards, including all PDDE, UDE, PSDE, Federal Partner Data Elements, and Metadata Elements
- May be more flexible to accommodate for VSP questions
- VSP chooses product but VSP and CoC play role in ensuring the comparable database meets the standards.

Should this project enter data into HMIS or a comparable database*?

Is the agency a Victim Service Provider**?

Yes

The agency cannot enter Personal Identifying Information (PII)*** into HMIS

No

Does the agency receive funds from the Family Violence Prevention and Services Act (FVPSA), Office for Victims of Crime (OVC), or Office on Violence Against Women (OVW) and use those funds agency-wide or for agency administrative purposes?

Yes

All projects, regardless of project type, are prohibited from entering PII*** into HMIS

No

Does the agency receive funds from FVPSA, OVC, or OVW to support specific projects?

Yes

Those specific projects cannot enter PII*** into HMIS

No

The project must follow funding requirements for using HMIS

Survivor Data

Survivor safety is imperative.

This means their data must be secure and confidential.

They must “own” their data for safety reasons. This means they have the right to refuse data collection.

VAWA Requirements

VAWA and FVPSA regulations:

Prohibit grantees from disclosing, revealing, or releasing any personally-identifying information.

States that in no circumstances can any personally-identifying information be shared in order to comply with data collection requirements.

Allows grantees to share non-personally identifying data in the aggregate.

Comparable Database Data

VSPs must enter required client-level data into a comparable database that complies with HMIS requirements.

System must be truly comparable.

However, data collection in comparable databases must be survivor driven. The survivor can say NO to providing their information and cannot be denied services.

Part I – HUD Guidance and Support

It's All About Relationships

- The CoC and VSP both have responsibilities when it comes to ensuring the use of a compliant comparable database (24 CFR 578.57(a)(3); 24 CFR 578.103(b)).
- VSPs should reach out to the HMIS Lead to discuss their need for a comparable database. They are usually the subject matter experts in the community.
- The CoC and VSP should work together in the selection process. It is a partnership!
- It is a process and HUD is giving communities time to make this partnership a successful endeavor.

Minimum Standards for Comparable Databases

Let's broadly review the [Comparable Database Vendor Checklist](#):

- Meet the security and privacy requirements (HUD, VAWA, and other federal, state and local laws)
- Contains all the Data Elements (PDDE, UDE, PSDE, and ME)
- Produces HUD's Annual Performance Report (APR), Consolidated Annual Performance Evaluation Report (CAPER), and Data Quality Framework
- Provides federal partner reports for partners applicable to the victim service provider (VSP)
- Exports all data in a comma-separated values text file
- Meets deadlines for updating HMIS standards

These criteria are not solely used to measure compliance, but rather to ensure that the vendor privacy that meets the minimum privacy standards and data collection/reporting requirements in addition needs of the community. This checklist can also be used as a strategic planning resource for how database can be used as a tool to prevent and end homelessness in the community. Working with Lead on the selection of a comparable database can help provide insight on the data management needs necessary to meet minimum standards.

To understand if you are required to implement a comparable database, review the [Victim Service Comparable Database and Reporting Requirements](#) and the U.S. Department of Housing and Urban Development's guidance on [when to use a comparable database](#).

Criteria	Requirements	Checklist Notes
The comparable database can protect data according to the different federal and local privacy laws, as needed; these laws are not universally applicable (i.e., HIPAA, 42 CFR Part 2) and, if the Violence Against Women Act (VAWA) is more restrictive, VAWA must be followed ¹ .	✓	
The comparable database has sufficient security protocols in place including end-to-end data encryption, automatic time out or lock out, concurrent login prevention, username and password access requirements, at least 128-bit+ encryption, SSL certificate, user log(s), and an automated audit trail.		
The comparable database vendor—if storing information with third-party or "cloud" servers—ensures that the contract with the storage provider specifies that the service provider owns the information, and ensures sufficient protocols are in place to protect personally identifying information. ²		
The comparable database contains all of the Project Descriptor Data Elements (PDDE) and response categories. ³		
The comparable database contains all of the Universal Data Elements (UDE) and response categories. ⁴		

¹ 42 CFR Part 2

² Frequently Asked Questions (FAQs) on the VAWA Confidentiality Provision (34 U.S.C. § 12291(b)(2))

³ HMIS Data Standards Manual: <https://www.hudexchange.info/resource/3824/hmis-data-standards-manual/>



Comparable Database Manual

A GUIDE TO ASSIST VICTIM SERVICE PROVIDERS WITH
UNDERSTANDING HUD FUNDING AND DATA ENTRY REQUIREMENTS

RELEASED APRIL 2021

ALIGNS WITH FY 2020 HMIS DATA STANDARDS

Homelessness Prevention (HP)

Homelessness prevention is housing relocation and stabilization services and possibly short- or medium-term rental assistance necessary to prevent people at risk of becoming homeless from becoming homeless. All participants of the HP project must be entered into the comparable database.

HUD Funding: HP is eligible to be funded under HUD's CoC and ESG programs. However, recipients can only be funded to provide HP under the CoC program if they are designated by HUD as a "high performing community."

Coordinated Entry (CE)

Coordinated entry is a process for people seeking, experiencing, or at risk of homelessness, to access homeless assistance. CE includes how people access services, how they are prioritized, and how referrals to housing and services are provided. The goal of CE is to increase the efficiency of local crisis response systems and improve fairness and ease of access to resources, including mainstream resources.

While VSPs are prohibited from entering PII into HMIS, HUD is encouraging CoCs to work with their VSPs to establish either a process for their participation in the CoC's CE system or establish their own CE process outside of the HMIS. It is important that this process provides access to all available housing and services regardless of whether the individual or family presents for intake at a victim-specific access point or a mainstream homeless service access point.

HUD Funding: CE is eligible to be funded under HUD's CoC (as a Supportive Services Only grant) and ESG programs (through the ES, Street Outreach, RRH, or HP components).

Data Collection Requirements

Further information on the rationale, collection point, subjects, and instructions for each element can be found in the [2020 HMIS Data Standards Dictionary and Manual](#).

Universal Data Elements (UDE)

All ESG and CoC program recipients and subrecipients, for all project types, are required to collect all the Universal Data Elements which include:

- 3.01 Name
- 3.02 Social Security Number
- 3.03 Date of Birth
- 3.04 Race
- 3.05 Ethnicity
- 3.06 Gender
- 3.07 Veteran Status
- 3.08 Disabling Condition

- 3.10 Project Start Date
- 3.11 Project Exit Date
- 3.12 Destination
- 3.15 Relationship to Head of Household
- 3.16 Client Location
- 3.20 Housing Move-in Date
- 3.917 Living Situation

Special notes about UDEs

- Many of these elements comprise basic demographics about a client which are critical to a comparable database's ability to de-duplicate client records.
- Two of the elements are required to identify a client as chronically homeless: Disabling Condition and Prior Living Situation.

Monitoring Roles

- SNAPS does not issue certificates of compliance for HMIS or comparable database software products.
- VSPs receiving HUD funding, are responsible for procuring and implementing a compliant comparable database.
- The CoC is responsible for monitoring recipients to ensure they are meeting program requirements.
- The HUD Field Office monitors recipients to ensure recipients are meeting program requirements.

There must be a partnership; a willingness to work together to help support the use of healthy, safe, and sustainable comparable database systems.

A Word to Vendors

HUD expectations with vendors

- VSP recipients must use a compliant comparable database or be at risk of a HUD Field Office finding or local finding.
- No Vendor is compliant 100% - 100% of the time!
- HUD offers flexibility by way of timeframe necessary to achieve compliance VSPs must demonstrate their Vendor is on a path to compliance through formal documentation (SOW or agreement).

HUD is providing resources for Vendors:

- [AAQ](#)
- Request for Technical Assistance
- Vendor specific calls

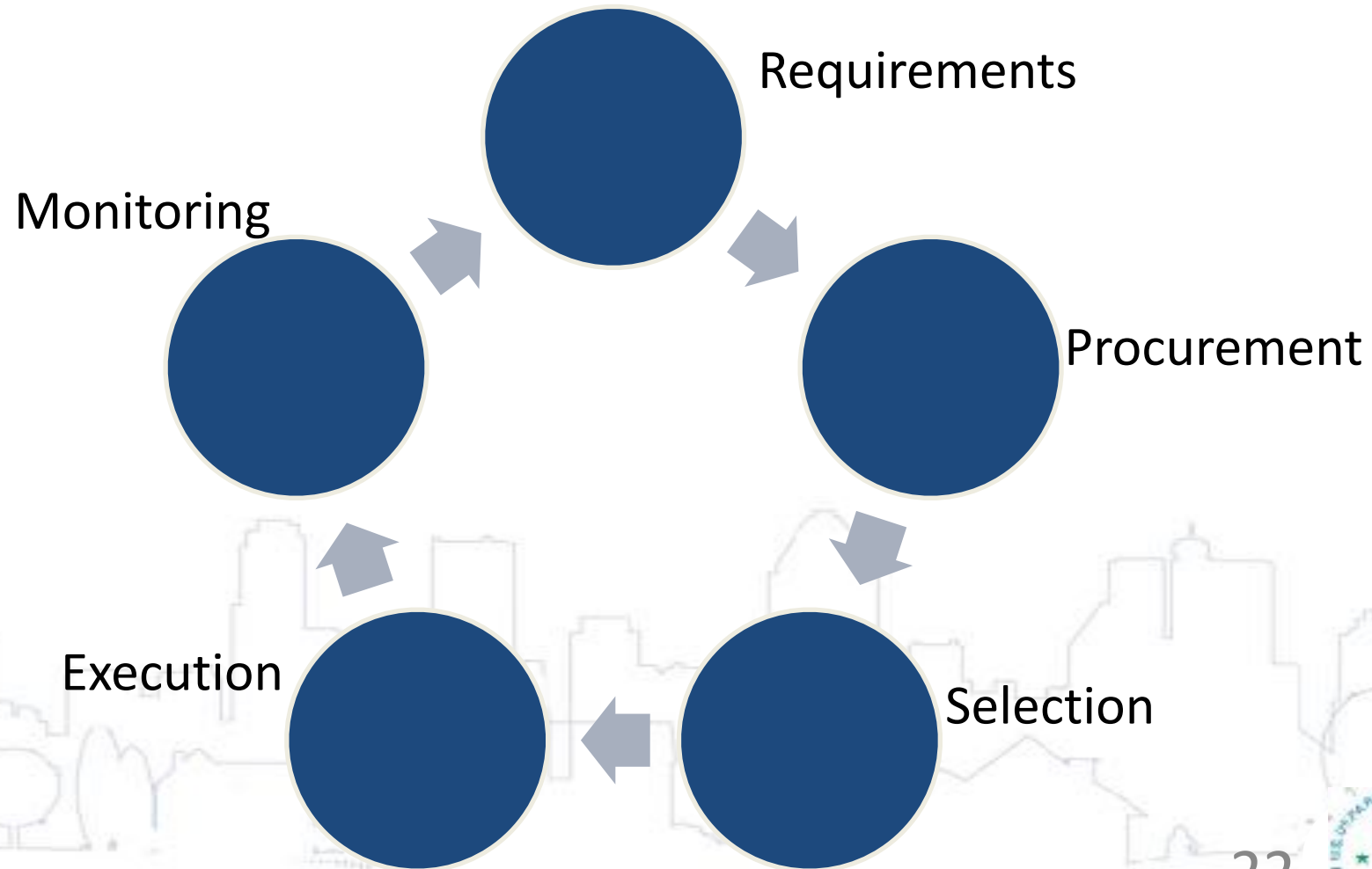
Tension Points Between HUD, CoCs, & VSPs?

Let's discuss the tension points that exist between HUD, CoCs, and VSPs when it comes to selecting a comparable database.

- What are those tension points?
- How do we resolve them?
- What if your CD is not compliant?

Part II – Contract Management

The Contracting Life Cycle



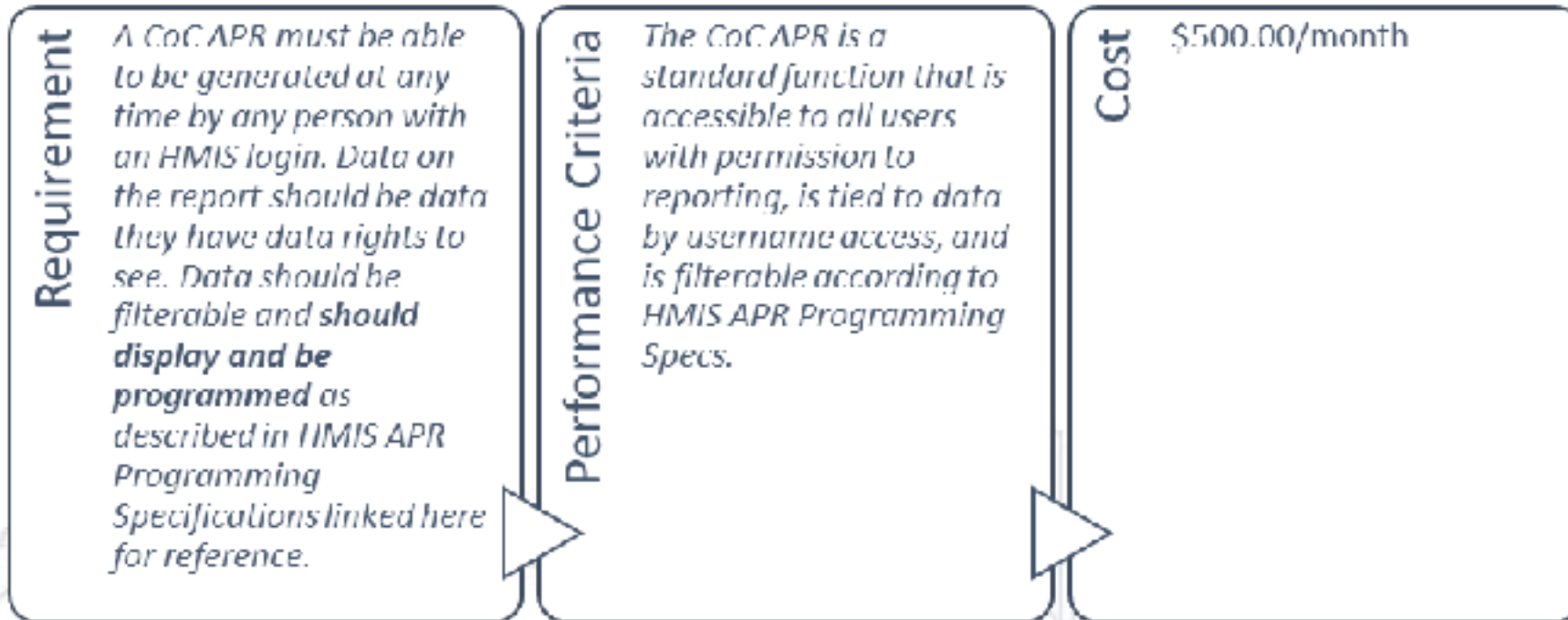
Requirements

- For example:

Category	Requirement	Have to Have (Functionalities)	Nice to Have (Features)
Reporting	Produce APR for upload to HUD on regular grant cycle deadlines (annually for each CoC grant) and for ongoing data quality monitoring of CoC grantees	<ul style="list-style-type: none">• CSV export to HUD specifications*• Data quality output (in addition to APR .csv files) to highlight missing/low quality elements by client & project• Start date, end date, single or multi-project, single or multi-project type filters in addition to HUD required parameters	<p>Multiple formats for output of results:</p> <ul style="list-style-type: none">• Excel• Web page• Hyperlink to client data• Summary <p>Visualizations of output</p>

Procurement / Selection / Execution

- Procurement: The Scope of Work for the contract with the vendor IS THE RFP for the competition and choices are limited for how they can respond

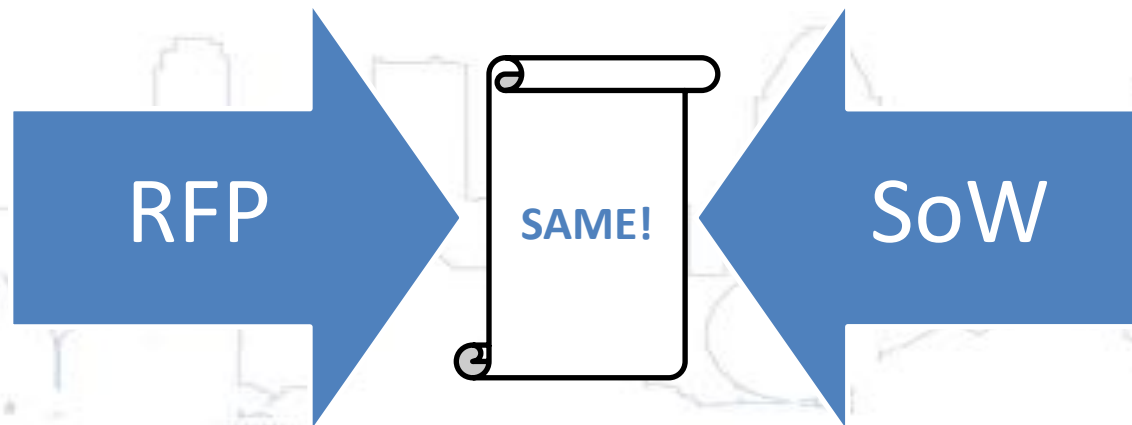


Procurement / Selection / Execution

- Selection: Each stage of the selection process ensures thorough scoring against the possibility that the vendor can carry out the scope of work.
- Scores from selection committee are arrived at by reviewing the words the vendor write in their response, the hands-on demonstration of their product, and what other customers say about those functionalities/features when doing reference checks.

Procurement / Selection / Execution

- Execution: Ideally, following the described process, the contract is essentially already written because the Scope of Work (SoW) was defined in the beginning (in addition to other terms/conditions at RFP release).
- Requires minimal negotiation – negotiation occurred during the RFP response and selection.



Additional Contract Considerations

Your procurement should include what the CoC and VSP must monitor with the vendor.

It's all about the words – what is and is not said and communicated in writing.

Bring your state DV/SA coalition, state and local VSP funders (VOCA/VAWA/FVPSA) for buy-in with decision making and avoid duplication of databases. This may also provide support around state-wide implementations.

Compliance is all about the partnership.

The HMIS toolkit that will be helpful to review. (<https://files.hudexchange.info/resources/documents/HMIS-Tools-for-Contract-Management.pdf>)

Final Contract Considerations

HUD has the HMIS Lead Series Tools for Contract Management toolkit available:

<https://files.hudexchange.info/resources/documents/HMIS-Tools-for-Contract-Management.pdf>

Reminder that contract management is about relationship management – <https://www.hudexchange.info/trainings/courses/implementing-effective-contract-negotiation-and-relationship-management-strategies-101>

PART III – Defining Monitoring

Three Kinds of Monitoring

1. Assessment of the comparable database during procurement
2. Program monitoring
3. Monitoring of the database

Best Practices

Best practices for VSPs include vendors not having access to the data. The goal is to always honor survivor confidentiality and safety.

The CoC and the VSP are jointly responsible for ensuring the comparable databases selected by VSPs complies with HUD's data collection, management, and reporting standards.

Same Community Goal

Reminder – this is all about working together towards a greater good:

Ending homelessness in your state, city or location; TOGETHER!

Community Example

KCADV and CoC collaboration

Katie French, MSW

Senior Program Specialist-Research, Evaluation, and Data Management
Kentucky Coalition Against Domestic Violence

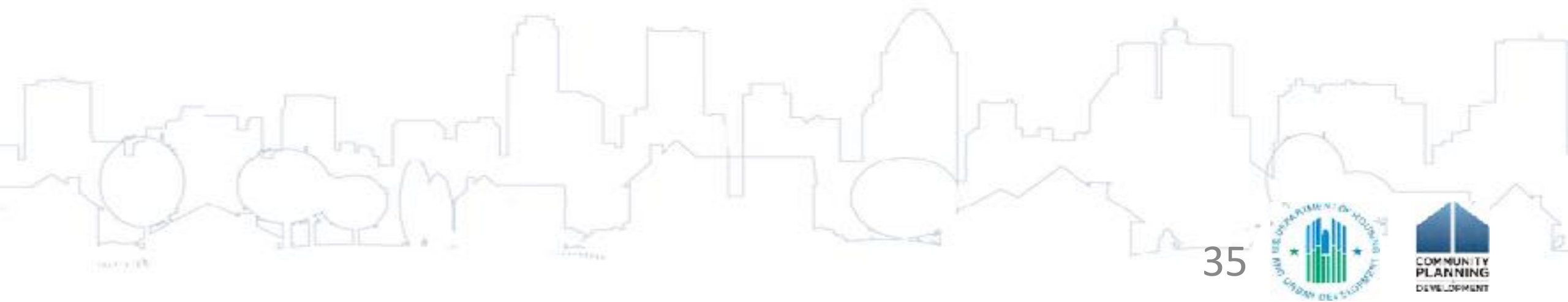
Danielle Humes with Kentucky Housing Corporation

Reflection

What seems possible now?

What seems possible for your communities in successfully implementing comparable databases?

Questions & Answers



Resources

VSP Comparable Database and Reporting Requirements: <https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-VSP-Comparable-Database-and-Reporting-Requirements.pdf>

Comparable Database Manual: <https://www.hudexchange.info/resource/6305/hmis-comparable-database-manual/>

CoC APR Guidebook: <https://files.hudexchange.info/resources/documents/sage-coc-apr-guidebook-for-coc-grant-funded-programs.pdf>

Resources

HMIS Tools for Contract Management: <https://files.hudexchange.info/resources/documents/HMIS-Tools-for-Contract-Management.pdf>

Frequently Asked Questions (FAQs) on the VAWA Confidentiality Provision: (<https://www.justice.gov/ovw/page/file/1006896/download>)

Victim Service Provider—Comparable Database ESG-CV Project Set-Up Tips: <https://www.hudexchange.info/programs/hmis/hmis-guides/#project-setup-and-data-collection-resources>

Resources

ESG HMIS Manual for the ESG-Caper: <https://www.hudexchange.info/resource/4447/esg-program-hmis-manual/>

CoC HMIS Manual for the CoC APR: <https://www.hudexchange.info/resource/4445/coc-program-hmis-manual/>

ESG CV Reporting Guidance: <https://www.hudexchange.info/resource/6181/covid19-homeless-system-response-emergency-solutions-grant-program-esg-cv-reporting-guidance/>