



CoC/VSP Comparable Database Responsibilities

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Welcome & Introductions

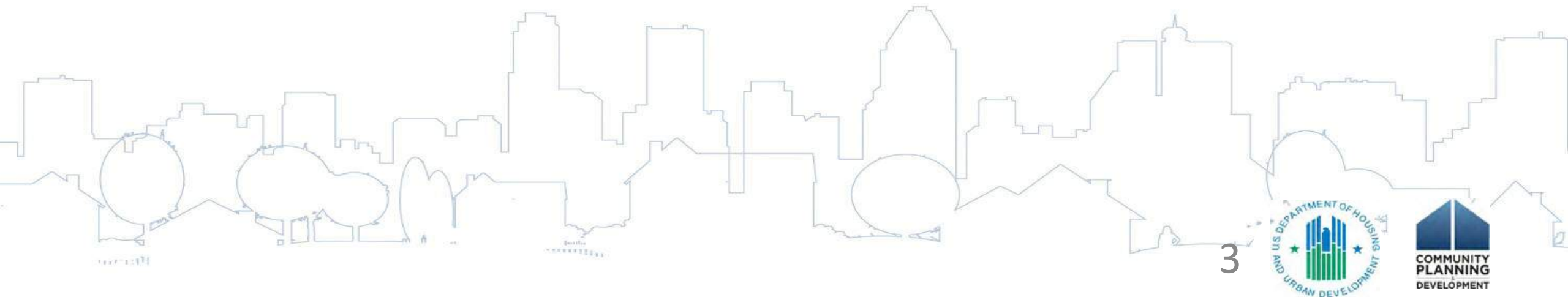
National Domestic Violence Hotline:
1-800-799-7233 (TTY 1-800-787-3224), or
911 if it is safe to do so

National Human Trafficking Hotline:
1-888-373-7888 (TTY: 711)|*Text 233733

Learning Objectives

In this session you will learn:

- HUD's minimum standards/requirements for comparable databases
- We will discuss important partnerships
- We will hear from a community about their experiences
- We will explore common questions/answers

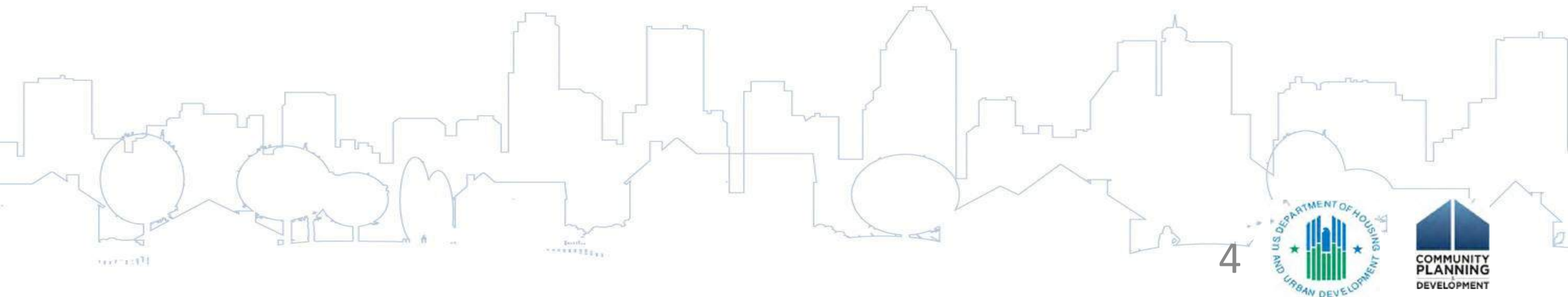


Survivor Data

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.



Victim Service Provider Perspective

- The challenges of HUD funding are very real for VSPs.
- One aspect of the challenge is related to ensuring a VSP selects a HUD compliant comparable database.
- CoCs and HMIS leads should support VSPs with an eye on building relationships that support the capacity of a VSP.
- VSPs should be supported by the CoC to end homelessness for those fleeing violence.

Best Practices

VSPs

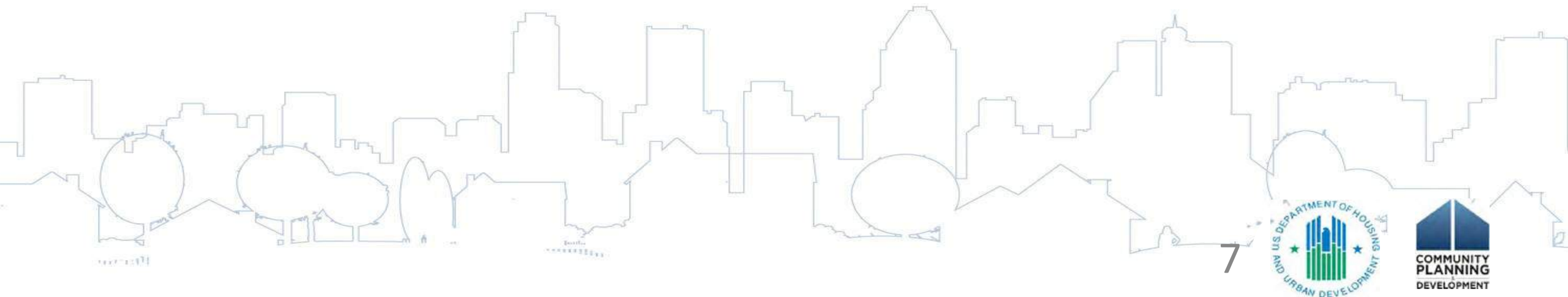
Survivor confidentiality
and safety

**CoC &
VSPs**

Jointly responsible to
ensure compliance

Supporting Culturally Specific VSP Programs

Engaging culturally specific and communities of color



McKinney Vento vs VAWA Data Collection Requirements

Hearth Act

- Establishes HMIS participation requirements for CoC and ESG Program-funded projects.
- Instructs VSPs that are recipients or subrecipients not to disclose data for HMIS.
- Defines VSP designation at the agency level.

VAWA

- Prohibits 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.

Defining Comparable Databases

Identical to HMIS;
Single Provider

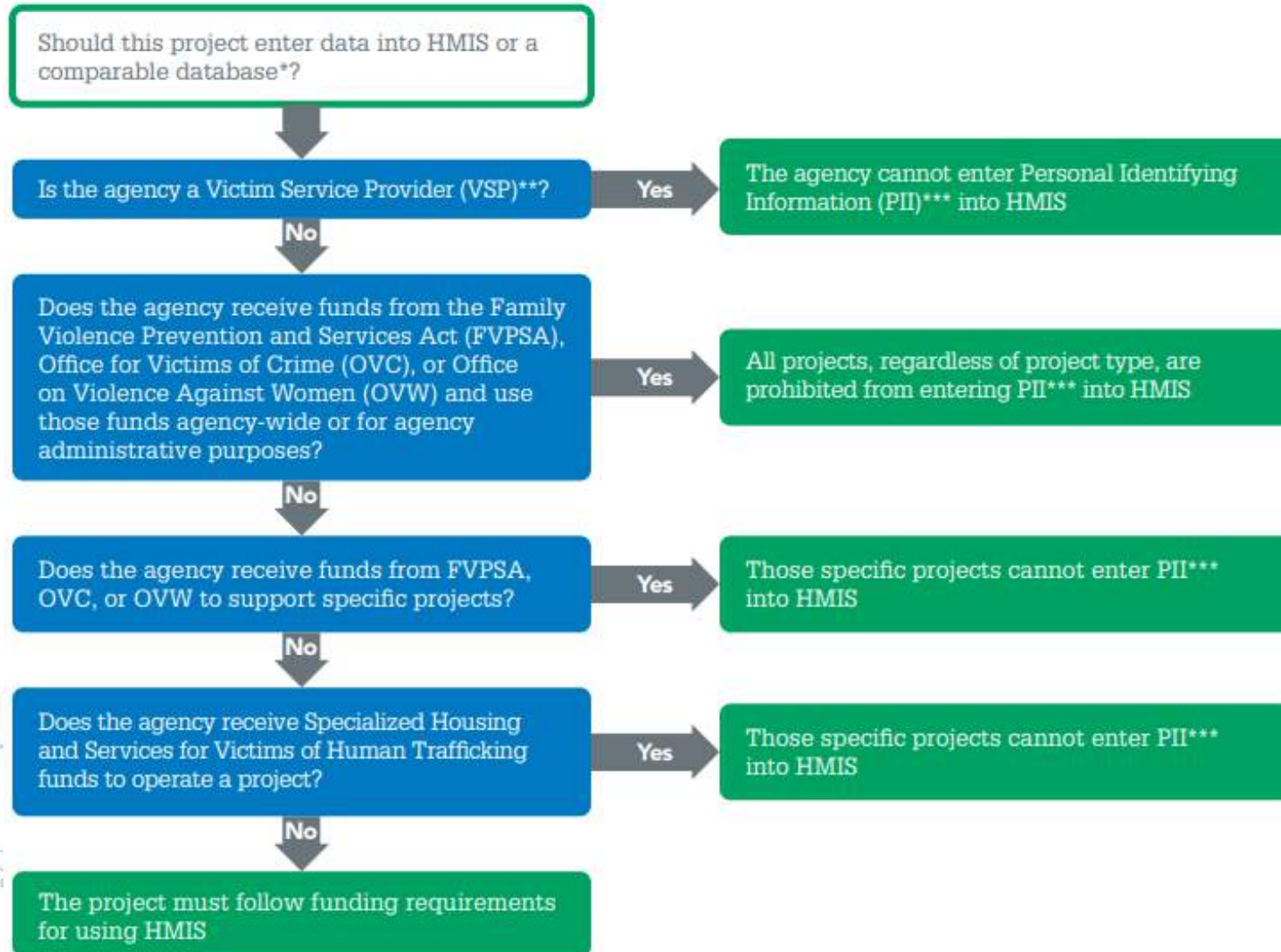
Must produce HUD
reports

Comparable
Database

Must be current with
HMIS data standards

Flexible system that
VSP chooses with
support of CoC

Comparable Database or HMIS?



Comparable Database Reporting

CoC Program

- Annual Performance Report CSV (APR)
- Coordinated Entry Annual Performance Report CSV (CE-APR)

ESG Program

- Consolidated Annual Performance and Evaluation Report CSV (CAPER)

Youth Homelessness Demonstration Program (YHDP)

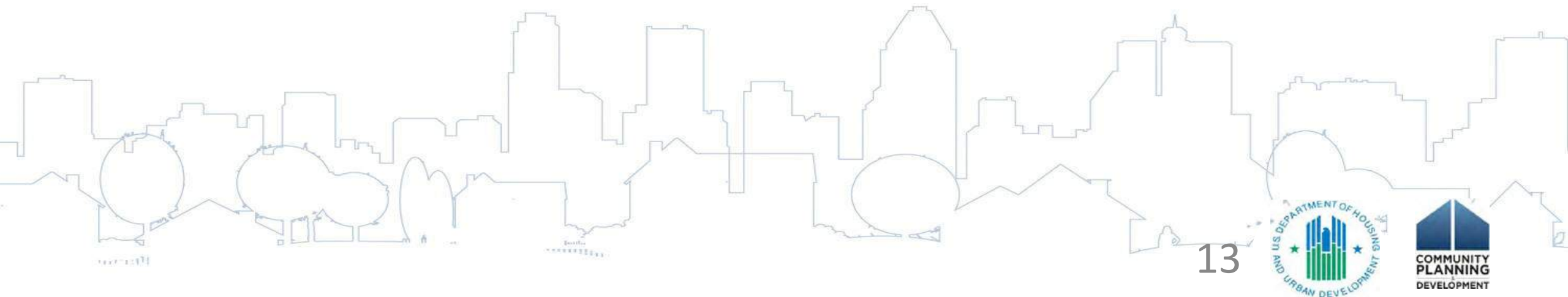
- HMIS CSV - hashed

Why am I hearing so much about comparable databases?

- There has historically been minimal guidance on comparable databases.
- HUD will no longer be giving blanket waivers for victim service providers and their data collection systems.
- VSPs that cannot generate required reporting must submit an AAQ to the Sage AAQ desk to initiate the process for implementing a compliance plan.
- HUD anticipates increasing enforcement of how it addresses concerns around databases that are not compliant.

Recipients that are out of compliance risk HUD monitoring findings.

Relationships & Building Partnerships



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)).
- HMIS Leads should reach out to VSPs 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.

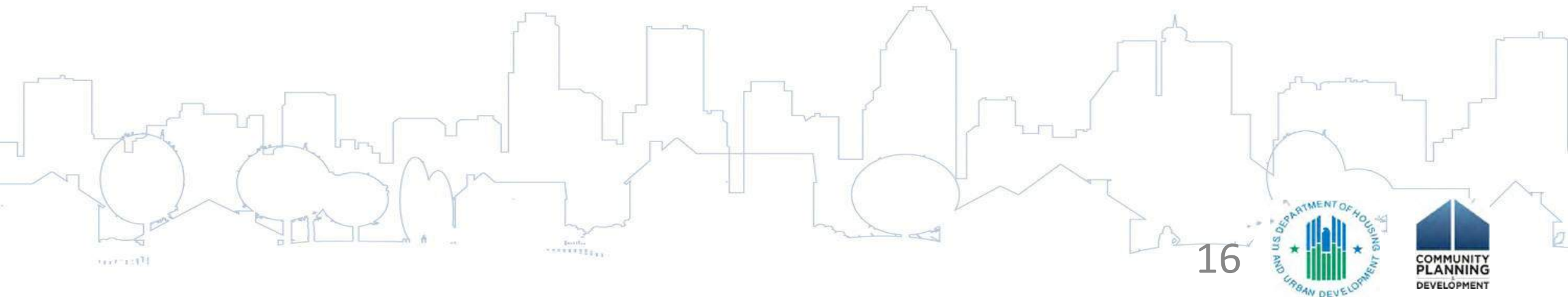
Funding support for VSPs Comparable Database

Cost and Resources for VSPs:

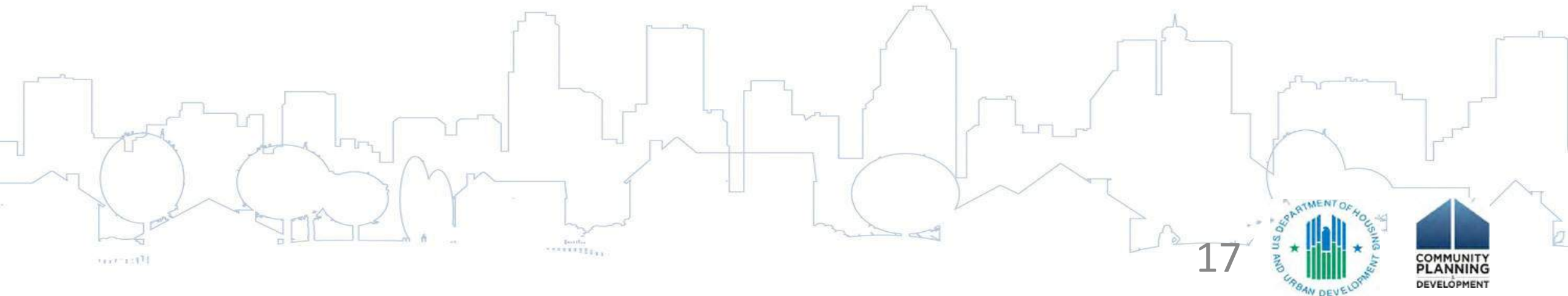
- Cost vary depending on the needs of the VSP
 - Cost to acquire and license the software
 - Cost for customizations
 - Cost for administration
- Resources for funding/supporting VSP
 - CoC Funds
 - ESG - CV Funds
 - Shared Administration responsibilities

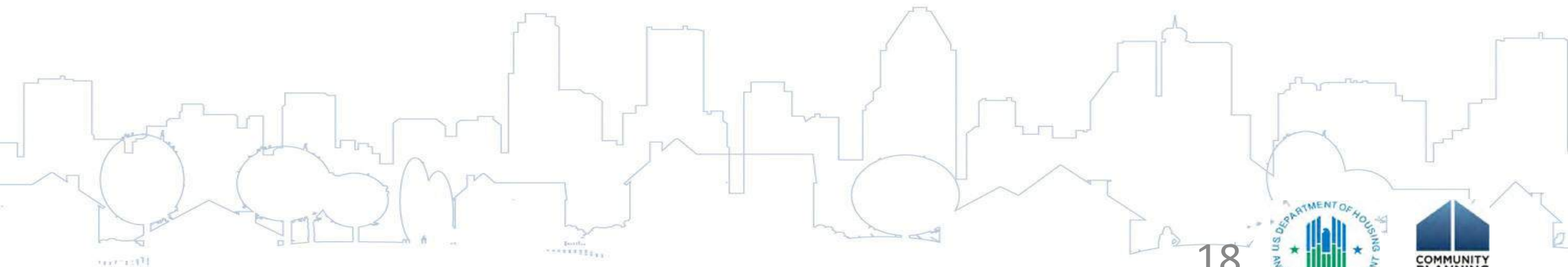
Same Community Goal

Reminder – this is all about working together towards a greater good:
Ending homelessness in your state, city or location; TOGETHER!

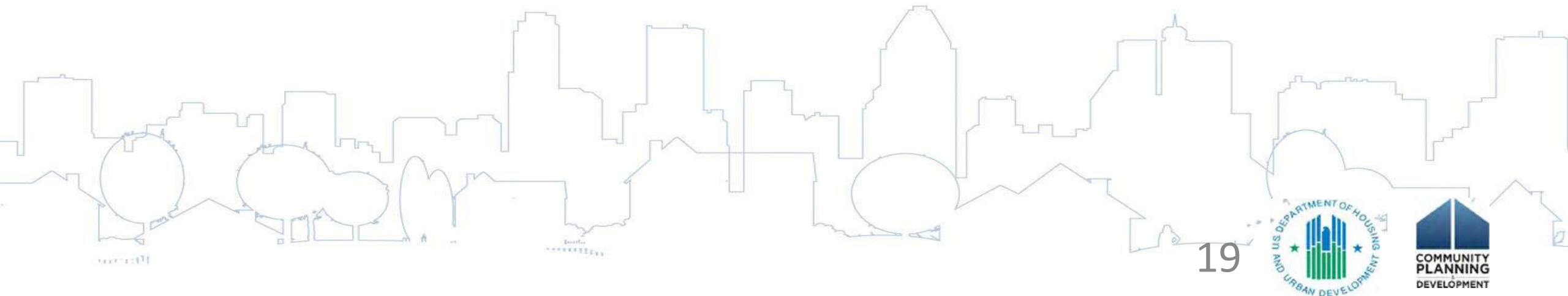


Community Snapshot





Organized Question & Answer session



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/>

[Comparable Database: Vendor Checklist](#)

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/>

Minimum Standards for Comparable Databases

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 product meets the minimum privacy standards and data collection/reporting requirements in addition to the needs of the community. This checklist can also be used as a strategic planning resource for how a comparable database can be used as a tool to prevent and end homelessness in the community. Working with a vendor that meets the minimum standards for 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 Provider \(VSP\) Comparable Database and Reporting Requirements](#) and the U.S. Department of Housing and Urban Development's (HUD'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:

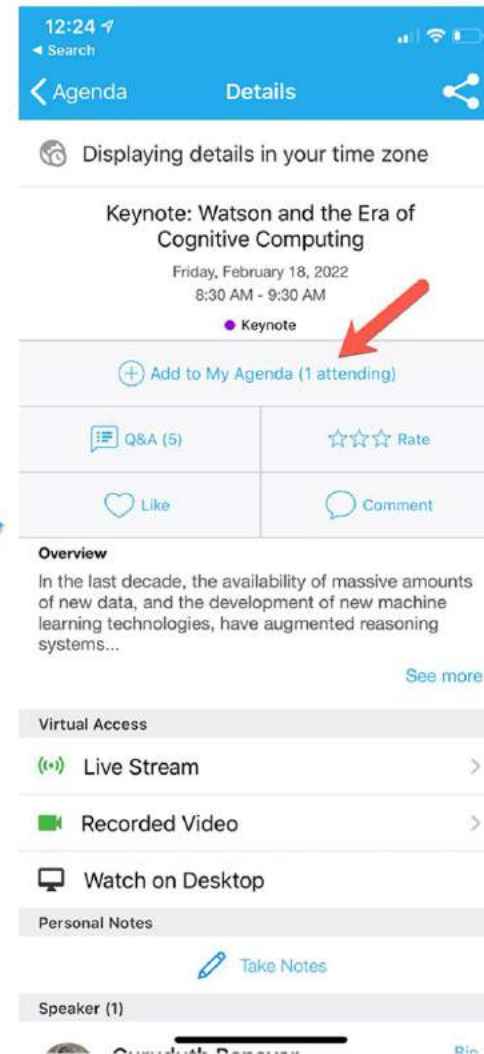
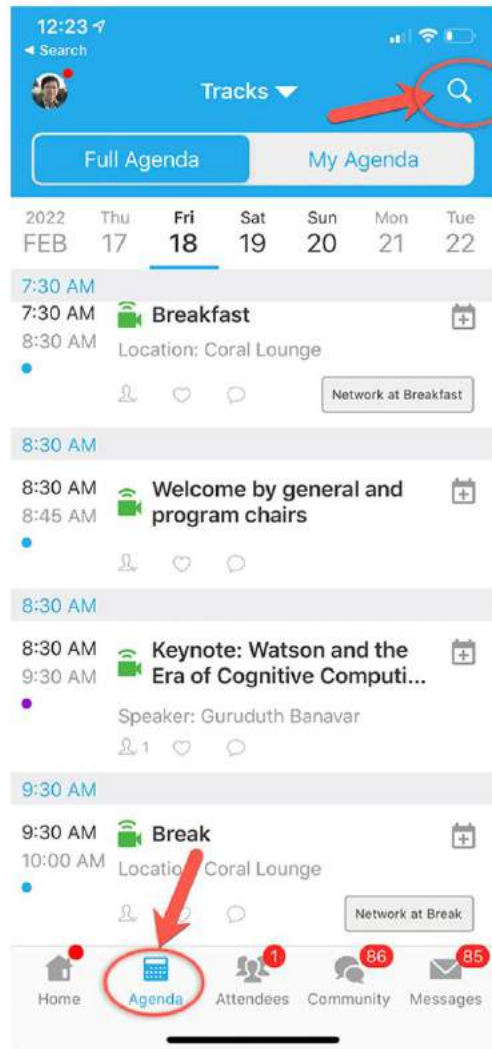
- 3.01 Name
- 3.02 Social Security Number
- 3.03 Date of Birth
- 3.04 Race
- 3.05 Ethnicity
- 3.06 Gender
- 3.07 Veteran Status
- 3.08 Disabling Condition

- 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.

Rate this Session!



Thank you!

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