HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
Finance & Data Committee Meeting Agenda

December 19, 2023, 9:00am

Committee members must participate in person (except for just cause reasons, or personal emergency reasons approved by the HSOC):

Room 356, County of San Luis Obispo Department of Social Services,
3433 South Higuera St, San Luis Obispo, CA 93401

Approved members with just cause reasons and the public may participate by Zoom video call:

https://us06web.zoom.us/j/89521802454?pwd=RjHLnU2P4BYvtYWNlKVug1TrcdyVHJ.1

Or dial in:
+1 669 444 9171 US
Meeting ID: 895 2180 2454
Passcode: 243473

1. Call to Order and Introductions

2. Public Comment

3. Consent: Approval of Minutes

4. Action/Information/Discussion

    4.1.   Implementing Five-Year Plan Line of Effort 3 – Improve and Expand Data Management Efforts Through HMIS and Coordinated Entry System to Strengthen Data-Driven Operational Guidance and Strategic Oversight

        4.1.1.   Homeless Management Information System (HMIS)

            4.1.1.1.   Action Item: Approve the updated Homeless Management Information System (HMIS) Privacy Notice to go into effect with the County's implementation of Bitfocus Clarity Human Services HMIS in 2024.

                4.1.1.1.1.   Attachment: San Luis Obispo County HMIS Privacy Notice

4.1.1.2.   Action Item: Approve the updated HMIS Data Quality Plan to go into effect with the implementation of Bitfocus Clarity Human Services HMIS in 2024

       4.1.1.2.1.   Attachment: Data Quality Improvement Plan

4.1.1.3.   Action Item: Approve the updated HMIS Release of Information (ROI) document to go into effect with the implementation of Bitfocus Clarity Human Services HMIS in 2024

       4.1.1.3.1.   Attachment: HMIS Release of Information Form

4.1.1.4.   Discussion Item: HMIS Upgrade Activities Update

4.1.1.5.   Discussion Item: HMIS System Administrators Monthly Call Report

    4.1.2.   2024 Unsheltered Point-in-Time (PIT) Count

4.1.2.1.   Action Item: Vote to approve the proposed Survey for the 2024 Homeless Point in Time Count of Unsheltered Persons

5.   Future Discussion/Report Items

6.   Next Regular Meeting: January 9 at 9 AM

7.   Adjournment

The full agenda packet for this meeting is available on the SLO County HSOC web page:
https://www.slocounty.ca.gov/Departments/Social-Services/Homeless-Services/Homeless-Services-Oversight-Council-(HSOC).aspx

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
FINANCE AND DATA COMMITTEE MEETING MINUTES

Date
November 28, 2023

Time
9:00-9:53 am

Location
Room 356, Dept of Social Services, 3433 S Higuera St., San Luis Obispo

Members Present
Brandy Graham (attended remotely)
Christy Nichols
Janna Nichols
Lauryn Searles
Mark Lamore
Sstoz Tes

Members Absent
Carrie Collins
Jessica Thomas
Kate Swarthout
Mimi Rodriguez
Shay Stewart

Staff and Guests
Diana Howard
Erica Jaramillo
Kari Howell
Kate Bourne
Laurel Weir
Merlie Livermore
Morgan Torell
Russ Francis
Skylar Caldwell

1. Call to Order and Introductions
Mark Lamore called the meeting to order at 9:00am. Introductions were made by those present at the meeting.

2. Public Comment
Christy Nichols shared that 2024 funding amount for HHIP (Housing and Homelessness Incentive Program) for the San Luis Obispo County could be up to 5M, if all the required metrics are met. She will provide more information at the next meeting.

Brandy Graham of the CAPSLO (Community Action Partnership in San Luis Obispo) shared that the SSVF (Supportive Services for Veteran Families) programs across the nation are seeing a seventy-five increase in funding for next year's services. This increase in funding will significantly impact CAPSLO SSVF and Good Samaritan SSVF programs in continuing to provide services. Brandy reported CAPSLO SSVF program served 119 veteran families at the end of the program year on September 30. Their target for next year with the increased funding will be 130 veteran families. Brandy also reported that on their latest bi-weekly meeting where they've updated the veteran by-name list, there are currently only 16 veterans seeking services that are currently homeless. This is the lowest number on their list as compared to 300-350 veterans seeking help when they started the list eight years ago. She mentioned their collaboration with the People's Self-Help Housing had an impact in lowering the number of homeless veterans down.

Mark Lamore shared that TMHA was just awarded a 5M grant through the CARE (California Reentry and Enrichment) Program. Mark mentioned that with this funding, once they've identified a location, they will develop a 12-bed transitional higher needs facility.

3. Consent: Approval of Minutes
Janna Nichols moved the motion to approve the minutes. Lauryn Searles seconded the motion. Voice vote was taken. All were in favor. Minutes approved.

4. Action/Information/Discussion
4.1 Implementing Five-Year Plan Line of Effort 3 - Improve and Expand Data   Management Efforts Through HMIS and Coordinated Entry System to Strengthen Data-Driven Operational Guidance and Strategic Oversight
4.1.1   Discussion Item: Case Manager Attendance at HSOC Finance and Data Committee Meetings
Kari Howell shared that it could be beneficial for case managers to attend this meeting as they can provide impactful input especially when it comes to policy discussions. Their involvement in this committee could also provide opportunities for case managers to share their expertise. A call to invite case managers via email was suggested by Brandy. Mark Lamore and Kari will work together to draft a letter inviting the case managers.

Lauryn Searles shared that it might be helpful for case managers to sit in on discovery calls, giving them a sneak peek at the HMIS and to segue them to participate in the committee.

4.1.2   Discussion Item: Homeless Management Information System (HMIS)
4.1.2.1 Discussion Item: HMIS Upgrade Activities Update
Kate Bourne shared that the team is holding its final discovery meeting this week with CAPSLO. Then the team will proceed with the actual additional migration activities and data cleanup. She mentioned that Bitfocus has produced their data analysis and in their report, they specified what needs to be fixed in the data provided to be compatible with HUD (Department of Housing and Urban Development) data formatting. After going through the data analysis report tomorrow, the first data HMIS office hour will be on Wednesday, December 6 from 11am-12noon. During this office hour, the team will present on data quality and how to make the fixes to have a successful data migration to Bitfocus. Kate also shared that they have been focusing on getting the learning

management system up and running. Any new users starting December 1 that need access to BellData will go through the learning management website. There will be more training when Bitfocus is launched in February.

4.1.2.2 Discussion Item: HMIS System Administrators Monthly Call Report
Kate Bourne reported that HUD started the call by talking about data standards update and the reports that went with the data standards update that went live earlier this year. She also mentioned that they are waiting on a couple of updates from HUD: the HUD-VASH (HUD-Veterans Affairs Supportive Housing) Translator tool and the updates to the Stella metrics. Kate also mentioned that updates on the SSVF monthly uploads are happening in December, the SLA (Longitudinal System Analysis) submissions opened and launched on November 13, and systems performance measures reporting will happen in early February.

4.1.3. Discussion Item: 2024 Unsheltered PIT (Point in Time) Count Update
Kari Howell shared the county wide PIT Count committee has been launched. Currently there are 21 members comprised of Public Health, outreach teams, local grassroots organizations in North County, Morro Bay, and the City SLO, county staff, and leaders from service providers. Kari shared the invitation for more members to join the PIT Committee. Meetings will be held every Thursday, starting November 30. The immediate priorities for the committee are to confirm the PIT Count start time, input guide incentives and recruitment strategies, and input for the survey. The first draft of the survey will be presented to the Finance & Data committee meeting in December. From December 14 through the first few weeks of January, the focus will be on volunteer recruitment and training. The team has already been engaged in various social media platforms in promoting volunteer recruitment.

4.1.4. Discussion Item: Longitudinal Systems Analysis (LSA) Update
Kate Bourne mentioned that the LSA data submission opened on November 13, and they have uploaded their first set of data successfully. There were only 33 initial flags, mostly issues that had to do with HUD's platform and calculation on data. Continuous uploads will be done to address each issue. The team also started data cleaning, which includes the housing inventory count. According to Kate, the final due date for the LSA is January 17.

5. **Future Discussion/Report Items**
   - Kari Howell proposed moving the next meeting up one week, to December19, to present the first draft of the PIT Count survey.
   - Brandy Graham suggested addressing diversity, equity, and inclusion and what is being done at the county level

6. Next Regular Meeting
December 19, 2023, at 9am

7. Adjournment
Mark Lamore adjourned the meeting at 9:53am.

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
ACTION ITEM
December 19, 2023

AGENDA ITEM NUMBER: 4.1.1.1

ITEM: Approve the updated Homeless Management Information System (HMIS) Privacy Notice to go into effect with the County's implementation of BitFocus Clarity Human Services HMIS in 2024.

ACTION REQUIRED: Vote to approve the updated HMIS Privacy Notice to go into effect with the County's implementation of BitFocus Clarity Human Services HMIS in 2024.

SUMMARY NARRATIVE:

HMIS is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally implemented data system used to record and analyze client, service, and housing data for individuals and families who are experiencing homelessness or at-risk of homelessness. The San Luis Obispo Homeless Services Division (HSD) serve as the HMIS Lead Agency for the San Luis Obispo County CoC and assumes responsibility for HMIS operation on behalf of the CoC.

As part of Line of Effort 3 of the the San Luis Obispo Countywide Plan to Address Homelessness, adopted in 2022, the County and the CoC set a goal of improving and expanding the CoC's HMIS.   To achieve these goals, the County selected a new HMIS vendor, BitFocus, along with a services vendor, Institute for Community Alliances (ICA). In preparation for the changeover from the previous HMIS to a new HMIS, HSD staff, alongside the vendors, conducted a review and developed updates to the governance and operational documentation to align with the future operations in Clarity Human Services.

The HMIS Privacy Notice is a HUD-required document for all HMIS Lead Agencies to implement in their systems. Following review by the vendors and the County, staff have developed a revised Privacy Notice for consideration and approval. This proposed Notice has been modified as follows:

-Added a new Section 2. Consent to align with updated ROI process. Defines "Standard Information" versus "Personal and Health Information".

-Added a new processes for electronic consent and verbal consent

-Section retitled from "Client Control Over Data" to "Understanding Your Rights"

-Additional detail provided in Section 5 with list of applicable privacy laws.

-Additional Section 5 for Grievance Policy. Space for agency information for initial requests and grievance filings.

BUDGET/FINANCIAL IMPACT:

There are no financial impacts to HSOC if the updated HMIS ROI is approved.

STAFF COMMENTS:

Staff recommend the approval of the Privacy Notice updates to align with the functionality of BitFocus.

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San Luis Obispo County HMIS Privacy Notice

This Privacy Notice applies to all San Luis Obispo County HMIS-Participating Providers and addresses how information about you (client) shall be used and disclosed by Providers as well as rights over your information. This notice establishes minimum standards by which the Providers must follow. Providers may implement more stringent rules and procedures. This Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment.

1. HMIS DATA COLLECTION & PURPOSE

A Homeless Management Information System (HMIS) is a local information technology system used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. This information is critical to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Providers may also be required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes.

This agency is an HMIS-participating homeless service provider ("HMIS Provider"). We collect information about the persons we serve in the shared County HMIS (HMIS) database. The agency shall only collect information deemed appropriate and necessary for program operation or information that is required by law or by the organizations that fund this program.

2. CONSENT

Through HMIS, we share your name, date of birth, age, gender, veteran status, and partial SSN ("Standard Information") with other HMIS Providers, unless you indicate that you do not want your Standard Information to be visible or tell an agency to mark your "Profile/Name" as private. You are still eligible for services if you refuse to have your standard information shared in HMIS.

Personal and Health Information: If you choose to sign the HMIS Consent for Release of Information (ROI), we will also share your enrollment information, which may include personal health information and information about your race, ethnicity, disabling conditions, previous residence history, employment history, substance abuse, sexual orientation, educational history and more. Your Standard Information and any information you release in your ROI is referred to as your Personally Identifiable Information (PII). This information will be visible in HMIS and may also be exchanged on paper, verbally or electronically based on uses and disclosures below.

Written consent to share your data in HMIS should be obtained at your first in-person meeting with the provider. Written consent may be obtained using the Electronic HMIS Consent for Release of Information, which indicates your consent to share your information.

Verbal consent to share your PII may only be obtained if the interaction meets the following criteria:

- The visit is not in person or not in a place ~~not~~ conducive to paper or electronic signature.
- Agency staff reviews (or reads, if not in person) the Privacy Notice with ~~the~~ you (posted at intake desk, on clipboard, via electronic methods or comparable location). An electronic link to the privacy notice can be found here (link).
- You verbally agree to provide and share personal information.

San Luis Obispo County HMIS Privacy Notice- 1 of 4

- Agency staff complete the Verbal Consent record in HMIS, attesting to their compliance with the procedure above.

3.PERMITTED USES AND DISCLOSURES

HMIS is designed to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data, including Personally Identifying Information Once collected, we (as an HMIS Provider) have obligations about how these data may be used and disclosed (**uses** are internal activities for which providers interact with your PII; **disclosures** occur when providers share PII with an external entity). **We may use and disclose your PII only for the following purposes:**

To fulfill HUD Requirements:

(1) To allow you to access to your information; and

(2) Disclosures for oversight of compliance with HMIS privacy and security standards.

(3) To provide or coordinate services to an individual or household;

(4) For functions related to payment or reimbursement for services;

(5) To carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions;

(6) For creating de-identified reporting from PII;

Additional Uses and Disclosures: We may use or disclose your Personally Identifying Information for other reasons, even without your permission. Subject to applicable federal or state law, we are permitted to disclose your Personally Identifying Information without your permission for the following purposes:

(7) Uses and disclosures required by law;

(8) Uses and disclosures to avert a serious threat to health or safety;

(9) Uses and disclosures about survivors of abuse, neglect or domestic violence;

(10) Uses and disclosures for research purposes; and

(11) Uses and disclosures for law enforcement when a subpoena is provided.

HMIS Providers must also ensure that **any use or disclosure does not violate other applicable local, state, or federal laws**. Therefore, some HMIS Providers **may have more restrictive privacy policies**, often dependent upon funding source or the nature of a projects. Specific, per-project information regarding data use and disclosure can be obtained upon request. This can include agencies that must comply with the Health Insurance Portability and Accountability Act (HIPAA), Violence Against Women Act (VAWA). In these instances, the more restrictive policies take precedence.

4. UNDERSTANDING YOUR RIGHTS

HMIS recognizes every independent legal adult (person over 17 years of age) as the owner of all information about themselves, and any parent, legal guardian, or legal power of attorney as the designated owner of all information about any household members under their guardianship (all minors and any incapacitated/disabled adults).

By seeking assistance from this HMIS Provider and consenting to your personal information being shared within the HMIS, you transfer governance responsibility over your HMIS record to us, and we are responsible for handling your record in accordance with HMIS privacy policies and any applicable federal, state, or local requirements. You retain ownership of your information within your HMIS record, and as owner **you have the following rights, in general:**

San Luis Obispo County HMIS Privacy Notice- 2 of 4

- Your refusal to share information will not be used to deny you services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request. You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request[1]
- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CRF, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

5. Requests and Grievance Policy

Agency Requests and Grievance

If you feel your privacy rights have been violated, or to request changes or copies of your records, please submit a written request to this agency:

INSERT AGENCY NAME and ADDRESS C/O
Or Via Email to: [INSERT AGENCY EMAIL](#)

Escalated Grievance Policy

The [HMIS Grievance Form)](#) or a similar written format can be used if you feel your privacy rights have been violated by an HMIS Participating Agency. An escalated grievance is to only be used after you have worked with the agency to resolve an HMIS issue and that resolution was not satisfactory.
You will submit this form to the HMIS Lead and will be reviewed by the designated Homeless Services

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[1] We can deny a request to inspect or copy your PII for the following reasons: *(1) Provider Right to Deny Review: if information is compiled in reasonable anticipation of litigation or comparable proceedings; (2) if information about another individual other than the participating provider staff would be disclosed; (3) if information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the sources of the information; or (4) if the disclosure of information would be reasonably likely to endanger the physical safety of any individual; and we can reject repeated or harrasing requests for access or correction.*

Oversight Council Committee to recommend resolution between you and the agency.

It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.

Grievances may be submitted in writing to:

County of San Luis Obispo Dept of Social Services
Attn: HMIS Lead
3433 S. Higuera St San Luis Obispo, CA 93401
Or
Via Email to: SS_HMISSupport@co.slo.ca.us

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[Attachment 4.1.1.1.1](#)

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**HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
ACTION ITEM
December 19, 2023**

AGENDA ITEM NUMBER: 4.1.1.2

ITEM: Approve the updated Homeless Management Information System (HMIS) Data Quality Plan to go into effect with the implementation of BitFocus Clarity Human Services HMIS in 2024.

ACTION REQUIRED: Vote to approve the updated HMIS Data Quality Plan to go into effect with the implementation of BitFocus Clarity Human Services HMIS in 2024.

SUMMARY NARRATIVE:

A Homeless Management Information System (HMIS) is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally implemented data system used to record and analyze client, service, and housing data for individuals and families who are experiencing homelessness or at-risk of homelessness. The San Luis Obispo Homeless Services Division (HSD) serve as the HMIS Lead Agency and assumes responsibility for HMIS operation on behalf of the CoC.

Line of Effort 3 of the San Luis Obispo Countywide Plan to Address Homelessness focuses on the improvement and expansion of HMIS. In order to achieve these goals, a new HMIS vendor, BitFocus, was selected along with a services vendor, Institute for Community Alliances (ICA). HSD staff, alongside the vendors, have conducted a review and are providing updates to the governance and operational documentation to align with the future operations in Clarity Human Services.

The San Luis Obispo HMIS Data Quality Plan was approved by HSOC on May 6, 2020 and reflected the 2020 HMIS Data Standards. There have been two subsequent sets of data standards implemented since that time. In order to reflect the most-recent HUD guidance and new ability to review and monitor in Clarity Human Services, the prior Data Quality Plan has been revised to become the HMIS Data Quality Management Plan. Some key additions and revisions include:

- Expand the scope of the plan to include DV Comparable Databases

-Clarified roles and responsibilities of staff and HMIS Participating Agencies

-Description of HMIS Data types and elements

-Coordinated Entry Timeliness standard updated to 48 hours. All other projects listed at 72 hours of contact.

-Description of Self-Monitoring tools

-Addition of Appendix A: Data Quality Improvement Plan

BUDGET/FINANCIAL IMPACT:

There are no financial impacts to HSOC if the Data Quality Plan is approved.

STAFF COMMENTS:

Staff recommend the approval of the Data Quality Plan updates to align with the functionality of BitFocus.

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
HOMELESS SERVICES DIVISION

DQMP

HMIS Data Quality Management Plan

DQMP
Version Number 1
Status: Draft
Approvers:

Implementation Partners (ICA)
12-11-2023

CONTENTS

DOCUMENT CONTROL

Change Log

Date	Changed By	Description	Reviewed by	Effective Date
12/11/2023	Abby Burgess, Zach Ehmann, Jessica Jones	Initial Version		

Distribution List

Date	Name	Title	Status

INTRODUCTION

Purpose

The San Luis Obispo County CoC Data Quality Management Plan (DQMP) articulates the CoC's goal to continuously improve the completeness, timeliness, accuracy, and consistency of its data and establishes the policies and procedures for meeting this goal as a community. This document aims to provide all participating entities with a shared context for the plan and a clear understanding of their roles and responsibilities in its execution.

Administrative Scope:

This document was expanded and updated as part of the implementation of the Clarity Human Services HMIS software and will contain the required information to maintain the HMIS after implementation.

CoC Data Systems

The CoC is required to gather information on all persons experiencing homelessness and all homeless service providers (sometimes called "Covered Homeless Organizations") within their geographic jurisdiction. While the CoC is required to collect HMIS data elements using a single centralized database for federal reporting purposes and is charged with expanding its coverage, statutory and practical limitations introduce other systems of record into the CoC's data ecosystem.

The sections below define the two types of databases that are subject to this DQMP. Collectively, these are referred to as the **CoC Data Systems**.

Homeless Management Information System

HMIS serves as the primary system of record for all federally funded projects. Clarity Human Services is administered by San Luis Obispo County Homeless Services Department as the CoC's designated HMIS Lead, and the software vendor is Bitfocus. The required structure and baseline functionality of the system is defined according to the HMIS Data and Technical Standard Final Notice (July 2004).

DV Comparable Databases

CoC-participating Victim Service Providers (VSPs) that are funded to serve survivors of domestic violence are prohibited from participating in the CoC's designated HMIS and instead are required to utilize a "comparable database" that mirrors the capability of HMIS while complying with stricter privacy regulations. VSPs that receive HUD funding are still required to contribute to the CoC's reporting through the provision of aggregate data and through limited client-permitted data sharing for service coordination. Requirements are documented in the HMIS Comparable Database Manual.

Target Audience:

HMIS Participating Agencies and End Users

COC, HMIS LEAD AND HMIS PROVIDER STAFFING

Roles and Responsibilities

List the key stakeholders involved in this procedure. For each stakeholder, specify their roles and responsibilities related to the Data Quality Plan. Clearly define any specific tasks or obligations they have.

Title	Description of Role	Tasks
HMIS Program Manager	Management of HMIS Assigned initiative (PIT, etc.) and policy issues. Vendor management.	Oversight, review, and support of policy and procedures. Ensure adherence to data quality management plan, monitoring process and compliance.
Program Review Specialist	System Administrator role in application.	Assist in identification and correction of data quality issues with HMIS Providers. Provide support, technical assistance and training.
Business Systems Analyst	Lead on system administration and data / reporting.	System Administration tasks. Ensure data quality reports are available and accurate. Create self-monitoring tools for data quality. Assist in identification and correction of data quality issues with HMIS Providers.
Implementation Partner	Provide subject matter expertise and technical assistance to Homeless Services Department and HMIS Team.	Understand data quality elements required by HUD and Federal Partner programs. Systematically monitor the data. Communicate regularly with CoC and HMIS Providers to ensure resources are available to address data quality concerns. Support creation of data quality management plan and subsequent tools/ reports to support the implementation of the plan.
HSOC Data and Finance Committee (or designated sub-committee for HMIS Data and Reporting functions)	HMIS Oversight	Review and approve data quality plan. Set data quality benchmarks. Review data quality reports. Determine expectations for monitoring and compliance. Work with providers and the HMIS lead to develop and implement solutions for improving data quality. Consider data quality in the rating and

		ranking process for funding decisions.
HMIS Providers/ Participating Agencies	Adherence to HMIS policies and procedures, including the data quality management plan.	Set the tone for the agency's commitment to data quality. Monitor a project's data quality. Prepare for APR/ funding report requirements. Resolve any data quality findings as quickly as possible
HMIS Agency Administrator (s)	Serve as the primary contact (s) for all communications regarding the quality of data entered into CoC data systems.	Serve as a subject matter expert for the HMIS Provider. Support agency end users with system navigation and data quality. Ensure end users receive necessary training for HMIS. Maintain quality and accuracy of client data, user data and project information for the agency. Communicate project and funding updates and change to HMIS Lead, including changes to bed/ unit inventory. Review project set up requests and custom report request prior to submission to HMIS Lead.
HMIS End Users	HMIS Data Entry and adherence to HMIS policies and procedures, including the data quality management plan.	Enter data with completeness, accuracy, timeliness, and consistency.

HMIS DATA QUALITY RESOURCES

HUD's existing HMIS documentation and guidance serves as a key reference point for the CoC DQMP. The HUD Exchange links below provide access to the most recent versions of relevant documents considered in the formulation of the DQMP:

- HMIS Data Standards (*HMIS Data Dictionary* & *Data Standards Manual,* updated biannually)
- CoC Data Quality Brief (May 2017)
- System Performance Improvement Briefs (July 2017)
- SNAPS Data TA Strategy to Improve Data and Performance (September 2018)

HMIS DATA TYPES & CONVENTIONS

For the purposes of the DQMP, HMIS data elements are grouped into four types. Universal Data Elements (UDEs), Program Specific Data Elements (PSDEs), and Project Data Descriptor Elements (PDDEs), are designations derived from the HUD Data Dictionary. "Administrative" data elements reflect measures of data quality that are derived from data system metadata and calculated performance metrics rather than a discrete field in a database.

Project Data Descriptor Elements (PDDEs)

The Project Descriptor Data Elements (PDDEs) contain basic information about projects in CoC data systems. PDDEs are the 'building blocks' of these systems, enabling the following functions:

- Marking project data for inclusion or exclusion for federal reporting;
- Association of client-level records with the various projects in which clients will enroll in across project types;
- Definition of the type of project with which the client is associated the entire time they received housing or services;
- Identification of federal partner programs providing funding to the project; and
- Documentation of bed and unit inventory and other information relevant for federal reporting and strategic planning related to system capacity and utilization.

PDDEs are entered and managed by CoC data system administrators in collaboration with each CHO. They are created at initial project setup within the data system and updated as changes occur to project or funding and are subject to annual review by data system administrators.

HUD requires that the CoC (typically via the data system Lead) collect project descriptor information for all continuum projects within its jurisdiction participating in CoC data systems by collecting and entering client-level HMIS data elements as well as all residential continuum projects, regardless of their participation in CoC data systems. If the databases include client and service data entered by non-continuum projects (e.g., food pantries or other services that might be used by people who are not experiencing homelessness), the continuum must identify them as such using the PDDEs to ensure that data are excluded from required reporting on continuum projects.

Universal Data Elements (UDEs)

The Universal Data Elements (UDEs) establish the minimum data collection requirements for all CHO projects entering data into CoC data systems, regardless of funding source. The Personally Identifiable Information (PII) and UDEs (3.01 through 3.07) must be collected once per client, regardless of how many project stays that client has in the system. The remaining UDEs (3.08 through 3.917) are to be collected at least once per project stay.

Program Specific Data Elements (PSDEs)

The Program Specific Data Elements (PSDEs) have been designed by HUD to allow projects that receive funding from any HMIS Federal partners. As such, requirements to collect specific PSDE's vary based on funding source and project type. The HUD Exchange Federal Partners landing page serves a gateway to the manuals that provide the specific PSDE data collection requirements per program and project type.

PSDEs, as defined by HUD, provide additional information about the characteristics of clients, the services they are provided, and program outcomes. Many of these data elements represent repeated transactions and were designed to collect information that may change over time. The "Common Program Specific Data Elements," which are the PSDEs that are collected across most Federal
Partner programs, are presented in the table below.

Administrative Data Quality Measures

This document defines "Administrative Data Quality Measures" as metrics derived from other HMIS elements that establish validity or describe the relationship between data captured in the CoC data systems and the overall amount of data available in the community it is charged with collecting.

- **Timeliness** refers to the number of days between when information was effective and when that information was entered into the CoC Data System.

- **Bed/Unit Coverage** refers to the percentage of non-VSP homeless-serving projects' residential capacity and utilization is captured in HMIS. It is a function of a project's overall HMIS-participation status. The CoC aims to have this be as close to 100% as possible.

- **Utilization** refers to the occupancy percentage for available units/beds in CoC residential projects. Overly high or low utilization may reflect issues with PDDE data that must be corrected by data system administrators.

- **User Metadata** are captured automatically by CoC Data Systems and are used to understand the patterns of system access and data entry for organizations.

Missing Data Responses to HMIS Elements

Required HMIS data elements left blank in CoC data systems are considered "missing" for data quality purposes. However, to distinguish between cases where data collection was not attempted or recorded and those where a client declined to provide the information, most required HMIS data elements provide the options "Client doesn't know," "Client prefers not to answer," and/or "Data not collected" to be recorded in place of a blank value. **Although non-blank, these *may* have a negative impact on data quality.**

It is not the intention of HUD, Federal Partners, or the San Luis Obispo County CoC that clients be denied assistance if they refuse or are unable to supply the information. However, some information may be required by projects or public or private funders to determine eligibility for housing or services or to assess service needs.

Usage of "Client Prefers Not to Answer" and "Client Doesn't Know" Responses

These options are considered poor data quality but are provided to allow a response to be recorded for elements required to proceed with an assessment when a client is unwilling or unable to provide a response. These are never to be used in place of asking a client for information or in a situation where there was no opportunity to collect information. It is expected that service providers will attempt to collect responses to all required fields and develop rapport with clients to encourage responsiveness.

Usage of "Data Not Collected" Response

CoC data systems may require users to input a non-blank response for required HMIS data elements. In cases where information was not collected or is unknown to the end user entering the data, this response may be used. However, it is expected that this will be a last resort when information cannot be obtained through reference of other records or consulting the client.

Automatic Exits & Exit Destination Completeness in HMIS

Upon agency request and subject to existing policies and procedures, CoC HMIS system administrators may set up projects to automatically exit clients after a set number of days of non-activity. This approach is most often employed to reduce data entry burden and address Exit record timeliness issues for Street Outreach projects and Emergency Shelter projects utilizing a Night-by-Night workflow. However, their use comes with significant trade-offs for data quality: faulty exits may be created if contact/bed night services are not recorded in a timely manner, and all system-generated exits will have missing data for the Exit Destination element. At this time, there is no uniform requirement to utilize either an automated or manual workflow. CoC leadership reserves the right to approve or deny automation requests based on the expected impact to data quality.

Data Quality Standards

This section defines the data quality standards to which CHOs and CoC Data System

administrators are held accountable under the DQMP. The table below the next page shows the minimum benchmarks within each sub-component of the DQMP. In cases where sub-components encompass multiple data elements, the standard applies equally to each element rather than being an average of performance across elements. Sub-sections following this table provide additional information on these sub-components and procedural requirements that go beyond the data quality benchmarks listed.

Data Quality Benchmark Minimums by Project Type	CE	HP	ES (E/E)	ES (NbN)	PSH / OPH	RRH	SO[1]	SSO	TH
Project Descriptor Data Elements (PDDEs) (Completeness)	95%	95%	95%	95%	95%	95%	95%	95%	95%
Completeness: Universal Data Elements (UDEs)	90%	90%	80%	80%	95%	95%	80%*	80%	90%
Completeness: Program Specific Data Elements (PSDEs)	90%	90%	80%	80%	95%	95%	80%*	80%	90%
Timeliness	95%	95%	95%	95%	95%	95%	95%	95%	95%
Accuracy	95%	95%	95%	95%	95%	95%	95%	95%	95%
Consistency[2]	95%	95%	95%	95%	95%	95%	95%	95%	95%
CoC Data System Bed/Unit Coverage: Federally Funded	N/A	N/A	100%	100%	100%	100%	N/A	N/A	100%
CoC Data System Bed/Unit Coverage: Non-Federally Funded	N/A	N/A	85%	85%	85%	85%	N/A	N/A	85%
Bed Utilization	N/A	N/A	65% - 105%	65% - 105%	85% - 105%	85% - 105%	N/A	N/A	65% - 105%

Project Type Key			
CE	Coordinated Entry	**RRH**	Rapid Re-housing
HP	Homelessness Prevention	**SO**	Street Outreach
ES (E/E; NbN)	Emergency Shelter (Entry/Exit workflow; Night-by-Night workflow)	**SSO**	Supportive Services Only
PSH / OPH	Permanent Supportive Housing / Other Permanent Housing	**TH**	Transitional Housing

Standards for Project Descriptor Data Elements (PDDEs)

As CHOs do not enter PDDE information directly, meeting PDDE benchmarks requires active participation in CoC Data System information gathering and monitoring processes. In addition to responding to *ad hoc* requests for information in a timely manner, **CHO's are**

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[1] For UDE & PSDE Completeness, only considers clients with a Date of Engagement in the period, indicating that the client has agreed to actively participate in case management services.

[2] Depending on the element, calculated based on either level of individual administrative events or agency users.

required to notify the CoC data system leads of any project and funding changes (including updates to bed/unit inventory) by the 5th business day of month immediately following the month the update/change occurs. Updates and changes to PDDEs in HMIS can be communicated to the CoC HMIS System Administrator by submitting an (HMIS Project Set Up Form or Change Form TBD).

Standards for Client, Enrollment, & Assessment Data (UDEs & PSDEs)

In its CoC Data Quality Brief, HUD identifies data quality for client, enrollment, and assessment data as having four components: completeness, timeliness, accuracy, and consistency. The tables below provides a brief overview of these components, whereas the following sections address the standards the DQMP applies to CHOs.

Completeness	Timeliness	Accuracy	Consistency
All clients entered	Data are entered soon after collection	Truthfulness from clients	Common interpretation of questions
Complete identifying data entered	Changing data are kept up to date	Accurate data entered by staff	Common interpretation of client answers
Complete characteristics fields entered		Logical discrepancies between data elements entered for the same client are minimized	Common knowledge of what fields are required
All required enrollment, service, assessment, and exit data entered			

Completeness

HUD's CoC Data Quality Brief defines data completeness as "The degree to which all required data is known and documented." For the purposes of the DQMP's standards, completeness is measured as the percentage of non-missing values for each non-administrative HMIS data element at each point of data collection.

The San Luis Obispo County CoC encourages all CHOs contributing to its data systems to aspire to 100% collection of all data elements but recognize that this may not be realistic or possible in all cases. To further support continuous data improvement in this area, the CoC has created minimum percentage requirements for data completeness, which apply equally to each element of the UDE and PSDE data types, respectively.

Timeliness

The San Luis Obispo County CoC encourages all CHO's to aspire to 100% of data being entered into CoC Data Systems in a live and timely manner to facilitate HMIS being a tool for day-to-day business operations. However, the CoC recognizes that this may not be

realistic or even possible in all cases, and therefore have created the following minimum requirements for data timeliness based on project type:

Project Type	Client Event	Timeliness Standard (time between event occurrence and data entry)
Coordinated Entry	Current Living Situation	Within **48 hours** of client contact/service
	Entry	Within **48 hours** of client contact/service
	Exit	Within **48 hours** of client contact/service
Homelessness Prevention	Entry	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service
Emergency Shelter (Entry Exit workflow)	Entry	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service
Emergency Shelter (Night-by-Night workflow)	Current Living Situation	Within **72 hours** of client contact/service
	Entry	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service[3]
Permanent Supportive Housing / Other Permanent Housing	Entry	Within **72 hours** of client contact/service
	Move-in	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service
Rapid Re-housing	Entry	Within **72 hours** of client contact/service
	Move-in	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service
Street Outreach	Entry	Within **72 hours** of client contact/service
	Current Living Situation	Within **72 hours** of client contact/service
	Exit (completed or terminated program)	Within **72 hours** of client contact/service
	No-Contact Exits	After 90-days of no contact, project exit needs to be recorded by the end of the 93rd day of no-contact.
Supportive Services Only	Entry	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service
Transitional Housing	Entry	Within **72 hours** of client contact/service
	Exit	Within **72 hours** of client contact/service

Accuracy

Data quality measures of accuracy consider the degree to which the information present in CoC Data Systems reflect the actual situations of clients. Data accuracy is not easy to manage or monitor, requiring reference to sources of documentation external to CoC Data Systems as well as regular auditing of responses in the data systems for internal logical

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[3] Users should back-date to the date of last shelter night stay, NOT the date the client did not return.

congruence.

External Record Standard

To ensure accurate reporting of events, CoC leadership will cross-reference CoC Data System data against internal agency documentation as part of the annual HMIS monitoring process. **The goal is that 100% of client external agency records match the client's information entered into the CoC Data Systems, but a minimum of 95% is acceptable.**

Data System Correction Standard

Due to the complexity of data accuracy, specific standards have not been developed. Some amount of data incongruity may be unavoidable; however, CHO's should strive to minimize data incongruity that occurs. It is expected that CHOs will respond to requests to correct internal Data System accuracy errors within the timeframe parameters of the request. It is expected that accuracy corrections may be included as part of the quarterly Data Quality Monitoring process.

Known accuracy issues that may be included in cleanup requests will be updated in this plan after review of the new HMIS software system logics and common data quality issues.

Consistency

Data consistency means that data is understood, collected, and entered in the same way across all projects in CoC Data Systems. The CoC Lead will work with CoC Administrative Partners to ensure congruence across data systems, while CHOs are expected to meet the following standards by through their user management practices.

Initial User Training Standard

All CHO's data-contributing staff must complete an initial training prescribed by the CoC & HMIS Leads before being granted access to any of the CoC Data Systems. **It is expected that this training will be completed within 15 business days of assignment.**

Annual User Training Standard

For HMIS users, the CoC has established minimum annual HMIS training requirements.

User Activity Standard

End users must log into each CoC Data System to which they have access at least once in a 60-day period to maintain active user status. After 60-days of no use, the user account will be made inactive by the data system administrator.

CoC Data System Bed/Unit Coverage

Bed coverage is the number of homelessness services program beds in the CoC's geographic area that contribute data to the CoC Data Systems. The following project types are considered for this measure:

- Emergency Shelter (ES)
- Transitional Housing (TH)
- Rapid Re-Housing (RRH)
- Permanent Supportive Housing (PSH)
- Other Permanent Housing (OPH)[4]

As a lack of bed coverage limits the CoC's ability to evaluate its clients needs and project performance in addition to reducing the overall comprehensibility of its Data Systems, ensuring that bed coverage is as close to 100% is a high priority for CoC leadership. CoC leadership will focus on project types in the CoC that have less than 85% bed coverage for improvement efforts.

Bed Utilization

Utilization applies to residential (shelter and housing) projects and is measured as the percentage of project inventory that is being used to shelter/house a client in a given period. This measure not only serves to identify issues with client access to resources or bottlenecks in referral processes but also can serve as an indication of inaccurate or incomplete inventory or enrollment data.

The CoC acknowledges that the factors impacting utilization differ between project types and has set benchmarks accordingly. **Emergency Shelter & Transitional Housing projects are to maintain bed utilization between 65% - 105%. Permanent housing projects are to maintain bed utilization between 85% - 105%.**

Situations where a change in inventory records is necessary are defined by HUD in the Data Standards Manual. Refer to the PDDE Data Quality Standards for the requirements for reporting inventory changes.

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[4] Includes "Housing without Services" and "Supportive Housing without Services" designations.

CHO SELF-MONITORING TOOLS

CHOs are encouraged to self-monitor their data quality performance using reports available in the CoC Data Systems. This section details resources that are currently available for self-monitoring.

HUD Data Quality Report

The HMIS Lead recommends that CHOs run the HUD Data Quality Report to self-monitor **completeness** data quality for the HMIS Universal Data Elements (UDEs). Additionally, this report can be used to verify that enrollment data is up to date by comparing overall client counts against other data sources.

Documentation for running and interpreting this report can be found (future HelpScout Knowledge Base article) and technical specifications can be found within the HUD Standard Reporting Terminology Glossary.

APR & CAPER Reports

The HMIS recommends that CHOs run the CoC / ESG APR and CAPER reports to self-monitor **completeness** data quality for the Program Specific Data Elements (PSDEs). The APR & CAPER reports also provide more detail for **accuracy verification** and **Entry/Exit timeliness monitoring** than the HUD Data Quality Report, including demographic breakouts, client resources and barriers, and program-specific performance measures (e.g., number of outreach contacts prior to engagement; days from enrollment to housing move-in).

EVA Reporting Tool

TBD

Report Library

HMIS provides a standard set of "canned" reports that can be used for data quality self-monitoring. These typically allow the user to select a series of parameters on a report setup page, may be run immediately or scheduled, and are easily exportable after running.

The following reports are available (TBD)

DATA QUALITY MONITORING PROCESSES

Routine data quality monitoring at the CoC, CHO, project, and user level will be conducted by the CoC HMIS Lead (in collaboration with Administrative Partners for non-HMIS systems) to ensure the CoC and all its constituent data-contributing CHOs meet the data quality goals defined in this DQMP. In response to findings from monitoring, the CoC HMIS Lead will request corrections and provide support to improve the quality of data at the point of entry into the CoC Data Systems.

The HMIS Lead will perform monthly data integrity checks on the HMIS data, which will include the following steps:

- Run latest version of the HUD Eva Data Quality Tool
- Notify Partner Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Partner Agency Administrators if necessary;
- Notify Agency Executive Director if Partner Agency Administrators are not responsive to required corrective actions; and
- Notify HSOC Finance and Data Committee regarding any uncorrected data quality issues.

APPENDIX A: DATA QUALITY IMPROVEMENT PLAN

DEFINITIONS AND ABBREVIATIONS

Term	Acronym	Definition
Coordinated Entry System	CE	CoC system used to identify persons experiencing homelessness, prioritize them for intervention, make referrals to housing projects, and monitor progress from homelessness to housing.
Continuum of Care	CoC	Federally-defined administrative entity that is composed of homeless serving organizations, administrators, and other stakeholders; charged with ending homelessness in their geographic jurisdiction.
CoC Data Systems	-	Term used in this document to refer collectively to the HMIS and DV Comparable, databases that are used to collect, store, and report on HMIS data elements for CoC purposes.
CoC Lead	-	Organization responsible for administering CoC operations; manages system-wide report submissions and the community's application for CoC funding. San Luis Obispo County is the CoC Lead.
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes HMIS data elements for persons engaged by the CoC.
Data Quality	DQ	A measure of the validity and usefulness of data. Defined in this case as how accurately it portrays the conditions and operations of the CoC community.
Data Quality Improvement Plan	DQIP	Agreement between the CoC Lead and data-entering organization that establishes steps and benchmarks for data quality improvement for the data-entering organization.
Data Quality Management Plan	DQMP	The documented policies and procedures employed by a CoC to move toward its stated goals for data quality improvement and maintenance.
Department of Housing and Urban Development	HUD	Source of the majority of federal funding for CoC-participating organizations that establishes guidelines for HMIS data quality.

Domestic Violence	DV	Also called "inter-personal" or "intimate partner" violence, defined in this case as an experience of violence that qualifies a person for intervention from VAWA- and VOCA-funded entities.
DV HMIS Comparable Database	-	Database type required for DV-serving organizations (VSPs) funded by HUD as a substitute for participation in the CoC's HMIS.
Homeless Management Information System	HMIS	Database structure established by HUD for the collection of homeless services data. HUD-funded CHOs are required to participate in their CoC's HMIS, and the CoC is required to submit annual reports comprised of HMIS data elements.
HMIS Lead	-	CoC administrative entity charged with the operational management of the CoC's HMIS software. San Luis Obispo County is the HMIS Lead.
HMIS Participation	-	When A project collects all required data elements according to funder requirements and local CoC Policies and Procedures within the CoC's designated HMIS implementation, or that data is submitted to the CoC's designated HMIS implementation at least once a year to cover the whole year of required client data collected by the project.
Universal Data Elements	UDEs	HMIS data elements pertinent to clients and service interventions that are required across HMIS, regardless of funding type and that are generally applicable across project types.
Program-Specific Data Elements	PSDEs	HMIS data elements pertinent to clients and service interventions that are required by specific funding sources or for specific project type configurations.
Project Descriptor Data Elements	PDDEs	HMIS data elements that pertain to organization and project setup, essential for establishing the framework of service interventions for HMIS data collection and reporting.
Victim Service Provider	VSP	Term for a VAWA- or VOCA-funded organization who has at least one project that is dedicated to serving persons who have experienced DV.

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
ACTION ITEM
December 19, 2023

AGENDA ITEM NUMBER: 4.1.1.3

ITEM: Approve the updated Homeless Management Information System (HMIS) Release of Information (ROI) document to go into effect with the implementation of BitFocus Clarity Human Services HMIS in 2024.

ACTION REQUIRED: Vote to approve the updated HMIS ROI document to go into effect with the implementation of BitFocus Clarity Human Services HMIS in 2024.

SUMMARY NARRATIVE:

A Homeless Management Information System (HMIS) is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally implemented data system used to record and analyze client, service, and housing data for individuals and families who are experiencing homelessness or at-risk of homelessness. The San Luis Obispo Homeless Services Division (HSD) serve as the HMIS Lead Agency and assumes responsibility for HMIS operation on behalf of the CoC.

Line of Effort 3 of the San Luis Obispo Countywide Plan to Address Homelessness focuses on the improvement and expansion of HMIS. In order to achieve these goals, a new HMIS vendor, BitFocus, was selected along with a services vendor, Institute for Community Alliances (ICA). HSD staff, alongside the vendors, have conducted a review and are providing updates to the governance and operational documentation to align with the future operations in Clarity Human Services.

The Consent for Release of Information (ROI) document allows for sharing of client data between agencies in HMIS. Case managers and agency staff must obtain informed consent from the client or otherwise mark a client's record as "Private" in HMIS. A paper or electronic signature on an ROI confirms the client's consent. This process is further detailed in the HMIS Policies and Procedures and the HMIS Privacy Notice. Release of Information has been updated in the following areas:

-Categorize data elements into "Standard Information" and "Personal and Health Information"

-Additional section "How your information will be used?"

-Additional language to reflect functionality in BitFocus including marking data as private, and procedure for withdrawing consent

-Additional language added to clarify the ability to change information in HMIS

-Additional language added to clarify the applicable privacy laws.

-Additional language added to state client consent is needed for disclosures that are not detailed in the ROI

BUDGET/FINANCIAL IMPACT:

There are no financial impacts to HSOC if the updated HMIS ROI is approved.

STAFF COMMENTS:

Staff recommend the approval of this ROI document to align with the functionality of BitFocus and to unify HMIS operations in the San Luis Obispo CoC. A single CoC ROI document is consistent with other California CoCs including but not limited to Los Angeles HMIS Collaborative (LAHSA, City of Pasadena, City of Glendale), County of Riverside, Orange County, Santa Clara, and Santa Barbara.

San Luis Obispo County Continuum of Care
Homeless Management Information System

Consent for Release of Information

The San Luis Obispo County Continuum of Care (CoC) Homeless Management Information System (HMIS) is a secure database used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. Providers participating in a HMIS are required to collect universal data elements from all clients, including Personally Identifying Information, demographic characteristics, and residential history. This information is critical for providers and communities to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Some providers are also required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes. Most federally funded homeless service providers are required to participate and record the clients they serve in an HMIS.

This Agency participates in HMIS and shares information with other HMIS Participating Agencies to help coordinate the most effective services for you and your household members.

What information is shared in HMIS?

Standard Information	Personal and Health Information
- Name - Date of Birth - Age - Gender - Veteran Status - Partial SSN - Race and Ethnicity	- Disabling Conditions, including substance use disorder and mental health conditions - Homeless History - Employment Status - Sexual Orientation - Educational History - Domestic Violence Survivor data, if applicable.

How your information will be used?

- To provide or coordinate services on behalf of an individual or household.
- For payment or reimbursement for services.
- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating summary reports without identifying, you or confusing you with someone else
- For additional, specific uses defined in the HMIS Privacy Policy.

Who can have access to your information?

Your information will be shared with other San Luis Obispo CoC HMIS Participating Agencies that agree to maintain the security and confidentiality of the information. A list of HMIS Participating Agencies is available upon request.

How is your personal information protected?

The information that is collected in HMIS is protected by limiting access to the database and by limiting with whom the information will be shared, in compliance with the standards set forth in federal, state, and local regulations governing confidentiality of client records. Each person and agency that is authorized to read or enter data into HMIS has signed an agreement to maintain the security and confidentiality of the information. HMIS data is secured by passwords and encryption technology.

By signing this form, you understand and agree that:

- Your refusal to share information will not be used to deny your services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request.   You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request.
- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS, and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CRF, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

SIGNATURE AND ACKNOWLEDGEMENT

Your signature indicates that you have read (or been read) this client consent form, have received answers to your questions, and you willingly consent to have your information, and that of your minor children or dependents (if any), entered into the HMIS database. You also consent to share your information with other participating organizations as described in this consent form.

_____	_____	_____
CLIENT NAME	**SIGNATURE OF CLIENT**	**DATE**

_____	_____	_____
SPOUSE NAME	**SIGNATURE OF SPOUSE**	**DATE**

Signature of guardian or authorized representative (when required): _____

Relationship to client: _____ Date signed by guardian/authorized representative: _____

This release of information also applies to the following dependents:

Last Name	First Name	Date of Birth

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
ACTION ITEM
December 19, 2023

AGENDA ITEM NUMBER: 4.1.2.1

ITEM: Vote to approve the proposed Survey for the 2024 Homeless Point in Time Count of Unsheltered Persons.

ACTION REQUIRED:

Vote to approve the proposed Survey for the 2024 Homeless Point in Time Count of Unsheltered Persons.

SUMMARY NARRATIVE:

The U.S. Department of Housing and Urban Development (HUD) requires all HUD-funded Continuums of Care (CoCs) to conduct a Point in Time (PIT) count of all sheltered and unsheltered homeless persons within the CoC service area at least once every two years. The count must be conducted within a single, 24-hour period during the last ten days in January.

The purpose of the count is to provide the federal government with national data on the prevalence and demographics of homelessness. HUD also uses data from the Point in Time count, together with data from the County's Homeless Management Information System (HMIS), to measure the County's performance comparatively with CoCs in addressing homelessness. Additionally, the count has been used by the State of California to determine how much homeless assistance funding the CoC would receive from certain one-time only homeless assistance grants, such as the Homeless Emergency Aid Program (HEAP).

Thurmond Consultants, contracted to lead the County in the PIT Count, has ensured the proposed survey is consistent with the requirements promulgated by the U.S. Department of Housing and Urban Development (HUD). San Luis Obispo County CoC is required to ask certain questions to meet HUD standards to achieve nationwide consistency and nationwide trend analysis. In addition to HUD-required questions, each CoC can include additional questions to address local needs in homelessness response and prevention. The County Homeless Services Division provided planning and operational support alongside

the 2024 PIT Count Committee, comprised of representatives from service providers, city and government officials, people with lived experience, and local nonprofit agencies. Thurmond Consultants, County Staff, and the PIT Count Committee met and discussed over the course of two weeks the questions being asked, language and phrasing, and how many questions are used. Moreover, the proposed survey was sent to self-identified people with lived experience of homelessness to ensure accessible language within a client-centered approach to data collection.

For the 2024 Count, staff are recommending the proposed survey to meet HUD regulations and to address local homelessness needs.

For the sheltered count, the CoC will use a combination of HMIS data from HMIS Participating Emergency Shelters, data from comparable data bases for victim service providers, and interviews and surveys to collect demographic data from non-HMIS participating shelters and transitional housing.

BUDGET/FINANCIAL IMPACT:

The HSOC vote is advisory and will have no immediate financial impact. Once adopted, the survey will be implemented into software, for which the County already has licensing and dedicated staff. On the day of the count, Paper surveys will be available in Spanish and English.

STAFF COMMENTS:

Staff recommend the use of the proposed survey for the unsheltered count to obtain demographic information and other client-level data.