



**San Luis Obispo
Countywide 10 Year
Plan to End
Homelessness**

*We envision a future
in which the housing
and comprehensive
services necessary to
remain housed are
available for all,
affording everyone
maximum self-
sufficiency, and the
opportunity to be
productive and
participating
members of our
community*

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)

Meeting Agenda

May 6, 2020, 1 p.m.

Physical Location: Room 101, Department of Social Services,
3433 S Higuera Street, San Luis Obispo, CA

Members and the public may also participate by phone.

Call In Number: (717) 275-8940

PIN #: 798 2958

1. Call to Order and Introductions
2. Public Comment
3. Consent: Approval of Minutes
4. Action/Information/Discussion
 - 4.1. Discussion Item: COVID-19 impacts, responses, and resources
 - 4.1.1. Discussion Item: Combined Request for Proposals for COVID-19 Emergency Funding, Community Development Block Grant (CDBG) Funding, Federal Emergency Solutions Grant COVID-19 (ESG-CV) Funding, State Emergency Solutions Grant COVID-19 (ESG-CV) Funding
 - 4.1.2. Discussion Item: Local impact and response
 - 4.2. Action Item: Vote to approve the Ad Hoc Grant Review Committee's recommendations regarding prioritization for funding allocations for the pass through federal Emergency Solutions Grant Continuum of Care Allocation from the State of California
 - 4.3. Action Item: Vote to approve the Finance & Data Committee's recommendations for San Luis Obispo Continuum of Care Homeless Management Information System documents
 - 4.3.1. Action Item: Vote to approve the Finance & Data Committee's recommendations for San Luis Obispo Continuum of Care Homeless Management Information System Privacy Notice and Privacy Posted Notice

4.3.2. Action Item: Vote to approve the Finance & Data Committee's recommendations for San Luis Obispo Continuum of Care Homeless Management Information System Data Quality Plan

5. Committee Reports
6. Future Discussion/Report Items
7. Next Meeting Date: May 29, 2020
8. Adjournment

HOMELESS SERVICES OVERSIGHT COUNCIL

HSOC Meeting

March 18, 2020 1:00 p.m.

Physical Location: Veterans Hall, 801 Grand Ave, San Luis Obispo, CA

Members and the public were also able to participate by phone.

Call In Number: (717) 275-8940

PIN #: 798 2958

MEMBERS PRESENT	MEMBERS ABSENT	STAFF & GUESTS	
Amelia Grover Anne Robin Bettina Swigger Brandy Graham Carlyn Christianson Caroline Hall Deanna Cantrell Grace McIntosh Janna Nichols Jessica Thomas Joe Thompson Kristen Barneich Mariam Shah Marlys McPherson Nicole Bennett (alt. Theresa Scott) Scott Smith Steve Gregory (alt. Steve Martin) Susan Funk	Adam Hill Devin Drake Marcia Guthrie Marianne Kennedy Mark Lamore Paul Worsham Shay Stewart Tim Waag	Airlin Singewald Anne Wyatt George Solis Jeff Al-Mashat Jessica Lorange Laurel Weir Russ Francis Tony Navarro Wendy Lewis	
AGENDA ITEM		CONCLUSIONS/ACTIONS	FOLLOW UP
1. Call to Order and Introductions	Mariam Shah called the meeting to order at 1pm. Introductions were made.		

2. Public Comment	N/A		
3. Consent: Approval of Minutes	Carlyn made a motion to approve the minutes from the previous meeting, seconded by Kristen. All were in favor.		
ACTION/INFORMATION/DISCUSSION			
4.1 Discussion Item: Proposed HSOC Bylaw changes related to Election of Members	<p>Laurel provided some background to the changes proposed. At the last full HSOC meeting, the Council voted to amend the bylaws. This item is for discussion only; a vote will take place at the next full HSOC meeting. Laurel discussed the changes:</p> <ul style="list-style-type: none"> • Staff to convene ad hoc nominating committees, rather than the HSOC Executive Committee appointing these. This change is necessary because members are often unavailable, and this will enable HSOC to respond to nominations more quickly. • Changing the word 'amendment' to 'comment' regarding the Executive Committee's review of the annual proposed Membership Roster, as this is more appropriate. • Changing 'in November' to 'by the last meeting of each year' regarding the Executive 		

	<p>Committee's submitting the proposed Membership Roster, as due to the timing of grant actions, meetings sometimes take place in December.</p> <ul style="list-style-type: none"> • Adding 'along with any comment...' to the section regarding the Executive Committee's submitting the proposed Membership Roster, allowing the Executive Committee to pass comment on recommendations. • Adding 'as possible' to the end of a sentence – this is to correct a grammatical error in the original and does not change the meaning in any way. <p>Laurel confirmed that the proposed changes were the same as those in the agenda packet. There were no further questions. These changes will be voted on at the next meeting.</p>		
4.2 Discussion Item: State Homeless Assistance Grant Updates	<p>Updates were shared on the grants that the County currently receives.</p> <p>Homeless Emergency Aid Program (HEAP):</p> <ul style="list-style-type: none"> • 5Cities Homeless Coalition (5CHC): Janna gave an update about the funding 5CHC are 		

	<p>receiving for the acquisition and retrofitting of a building in Grover Beach, and for a homeless youth assistance program. Regarding the building, they have found more severe issues than anticipated. Emergency work has taken place to mitigate leaks, but there are still drainage issues. 5CHC are currently working with an architect on plans to modify an entrance/exit on the 2nd floor. The building will allow 5CHC to have eight private client meeting spaces as well as staff offices, hopefully in the next six months. Regarding the youth project, 5CHC are working with schools, particularly Lopez High School, in order to meet with youth, connect them with benefits, job searches and after school opportunities. They are also looking to rent a facility for youth who are able to live independently.</p> <p>The emergency building repairs were not anticipated, and so some additional funds will be needed, although the greater</p>		
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	<p>need is that 5CHC are short on funds for prevention and rapid rehousing. 5CHC has submitted a proposal to the County to increase allocations needed for direct financial assistance for these ends.</p> <ul style="list-style-type: none"> • El Camino Homeless Organization (ECHO): Jeff gave updates on ECHO's HEAP-funded projects in North County. Construction is about to begin on the Atascadero shelter expansion. This will expand from 50 to 60 beds, though there is some uncertainty due to COVID-19. The Atascadero building is moving towards being a 24 hour shelter. <p>Tony Navarro (County Planning & Building Department) shared that the only issue that needs to be addressed with the shelter is the testing of suspect building materials, as the building is from the late 1950s and so could contain asbestos or lead based paint.</p> <p>Jeff also provided information on ECHO's new building in Paso Robles. The plan for this center</p>		
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	<p>is to provide meals and a place for people to shower and sleep. The center will be open during the day for partner nonprofits to provide services, but ECHO will only provide overnight services for six months. This center will be open continuously regardless of weather.</p> <p>Steve Gregory (Paso Robles City Council) shared that the cost of this new building has been approved. A Memorandum of Understanding has been drawn up between ECHO and Paso Robles to operate this facility. Caltrans (Department of Transportation) have raised some concerns about access to the site, including pedestrian access. Some of these issues have been resolved.</p> <p>Wendy Lewis shared that ECHO has an employee in a new position, allowing them to provide more daytime hours which has proven critical. This has also given ECHO an extra layer of resources, so they have been able to add a job skills training program to work</p>		
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	<p>directly with individuals seeking employment. There have been several success stories from this program in just a few months.</p> <p>Homeless Housing, Assistance, and Prevention Program (HHAP): Laurel clarified that this is a one time grant from the state that HSOC has applied for. HSOC voted for priorities for this funding in January. Since then, the state has released more information on how this grant differs from the HEAP funding. The HHAP funding cannot be used to just fund shelter – the focus has to be on getting people out of shelter and into housing. Therefore, any proposal for shelter or emergency housing needs to include a plan for moving people into housing. This may have implications for some projects, particularly on the North coast. Supervisor Gibson will be convening meetings to begin discussions with the community on what kinds of projects may be needed on the North coast that would meet the new HHAP requirements. HSOC will also need to report on outcomes, not outputs (so we will need to say e.g. ‘we will</p>		
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	<p>decrease unsheltered homelessness by X% over Y years'). This will be discussed by the Finance & Data committee then recommendations brought to the full HSOC. The state expects HSOC and the County to work together on this, and that HSOC will periodically monitor its own outcomes, so a schedule will need to be set up for this. The state will also have to approve outcomes before HSOC can proceed with this fund. The County is still waiting to hear back from the state about this funding, and had expected to hear back in April, but this may be moved back due to COVID-19. There is therefore no indication at present for when the Request for Proposals (RFP) will go out. Following this, the Board will select grantees, and the funding will then be released fairly quickly by the state.</p> <p>California Emergency Solutions and Housing Grant (CESH): Laurel explained that the County receives two grants under the CESH program.</p> <ul style="list-style-type: none"> • The first grant is the 2018 funding which has been awarded. This has mostly 		
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	<p>funded outreach – 5CHC, ECHO and CAPSLO (Community Action Partnership of San Luis Obispo) are coordinating under this project and have outreach workers doing coordinated entry in the field.</p> <p>Grace shared that all providers have been talking about using a shared intake document to ensure they capture the same information.</p> <p>Janna and Wendy discussed the challenge of knowing what kind of outreach they should or should not be doing, particularly given COVID-19.</p> <p>Laurel covered this in the next section (4.3).</p> <ul style="list-style-type: none"> • The second grant is the 2019 funding of an additional \$392k, which has not yet been committed. The intent was to include this in local proposals for HHAP funding. Laurel suggested that HSOC may now want to allocate these funds towards a COVID-19 response, though the County is still waiting on a response from the state on whether this would be considered eligible activities. 		
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	<p>Laurel also proposed that as CESH funds can be spent over several years, HSOC may want to allocate some funding for future years, as if there is an economic crash due to COVID-19, it will be harder for government to provide funding for nonprofits. HSOC will need to look at all options and have a fuller discussion once the state has issued clarification on how the CESH funding can be used.</p> <p>California Emergency Solutions Grant (CA ESG): The County has just over \$100k to give out under this annual grant, which comes through the state but is federal in origin. This funding can be used only for very specific activities, although the federal government has put out guidelines for how this can be used for certain COVID-19 related activities. The funds won't be available for the County until July 2021. The County has issued RFPs, and applications are due from local providers soon, which will then be brought to the full HSOC meeting in May. Due to the timing of other meetings, HSOC will need to meet</p>		
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	<p>earlier than the intended date of May 20th. In order for the County to approve the grant on time, the full HSOC meeting must take place on May 6th instead. However, the County is still waiting to hear if the state is going to maintain or extend the current application deadline.</p> <p>Permanent Local Housing Allocation (PLHA): Airlin (Department of Planning & Building) updated the Council on this state grant. The state released a Notice of Funding Availability (NOFA) two weeks ago. The County's application is due to the state on July 27th, though deadlines may be adjusted in response to COVID. The tentative plan is for PLHA funds to be used for a wide variety of homeless and housing activities. The application needs to show how the County's funding requests will meet the unmet housing needs of the County, based on a regional housing needs allocation. The estimated value of this fund was \$680k initially, but this has increased to \$872k for the first year (this is an ongoing funding stream, annually renewed, though the amount of funding will fluctuate).</p>		
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	<p>The County's current plan is to start the application by developing draft funding recommendations based on input received from stakeholders including HSOC, nonprofit housing developers and homeless service providers. Based on this input, the County will draft the application, make this available for public review for 30 days, then take this to the Board of Supervisors for consideration for July 14th, in order to meet the state's July 27th deadline.</p>		
<p>4.3 Discussion Item: Coronavirus and Homelessness</p>	<p>The Council shared updates, including the Executive Order signed by Governor Newsom preventing evictions. Cities have been urged to adopt this order. While the order prohibits evictions, it does not exempt tenants from having to pay rent and so 5CHC are expecting people to be approaching them seeking assistance. Payment can be deferred for six months under this order, but the eviction limitation only relates to those who have seen a reduction in pay as a result of COVID-19.</p> <p>Laurel provided an update from the County. The County has declared a state of emergency, and activated an</p>		

	<p>emergency center, coordinating between different county agencies. Laurel has conferred with service providers and they are all taking steps to mitigate the issue, such as taking people's temperatures and creating isolation rooms. Laurel noted that this is a significant challenge for providers, especially shelters. All agencies have expressed concerns about ensuring they have personal protective equipment for staff, volunteers and clients. There are also concerns about the number of volunteers declining. The County has requested additional masks, gloves and hand sanitizer from the State but have not been able to procure any yet. The limited supplies that the County has at present are being prioritized for hospitals and first responders.</p> <p>Grace shared that no one has tested positive at 40 Prado, where they have begun taking people's temperatures at the door. Anyone who has a temperature over 100.4 is required to see onsite medical personnel. The biggest concern is losing staff, as the shelter cannot run without staff. The decision has been taken to close the doors if there are only two staff</p>		
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	<p>remaining. They are reaching out to old providers of overflow shelters, but there are concerns that these shelters (e.g. churches) need to understand the population and the situation and be properly equipped.</p> <p>Wendy gave an update on ECHO. They are following the CDC's recommendations, but in need of cleaning supplies and gloves. A major concern is losing volunteers, as they need volunteer chaperones for overnight shelters, but many of their current volunteers belong to at risk groups. They have had to postpone their Empty Bowls event in April, and are very concerned about funding. They have managed to secure three handwashing stations, and are taking temperatures as overnight guests come in. They are working with the County to secure one or two FEMA trailers, and have secured emergency food from the Food Bank.</p> <p>Janna gave an update on 5CHC. With regard to regular services, the office is closed but they are dealing with clients remotely. They had been operating a warming center, but there are a number of challenges with</p>		
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	<p>continuing to do this, as there is no isolation room and no showers. They are working to identify other options, such as creating shelter in place locations, to stop people moving around and provide services where they are. They have acquired 30 sleeping bags and tarps.</p> <p>Jeff commented that the biggest issue ECHO has encountered in Paso Robles is getting clients to take the situation seriously. They are trying to keep the meal program going, but are evaluating the situation day by day. The biggest concern here is that people do not have a place they can shelter.</p> <p>The Council discussed the guidance from the CDC (Centers for Disease Control and Prevention), to send people to hospital if they are showing the main symptoms, and how this differs from the Public Health protocol which is to not inundate local emergency rooms with people not in medical crisis. Public Health has stated that people's first option should be to go to their primary care physician, but many people experiencing homelessness (both</p>		
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	<p>sheltered and unsheltered) do not have these. This is also more challenging currently as physicians are also trying to reduce the number of people coming into their offices.</p> <p>Susan provided an update on the Atascadero warming center. This was slated to close for the season on Sunday, but has received funding from the County to remain open continuously through March 31st until further notice. They are offering lunch bags and breakfast, but not congregate meals. Susan thanked the County for this additional funding.</p> <p>Laurel reported that she spoke with the County's two DV (Domestic Violence) shelters recently, and they are working to try to create rooms to set aside for isolating people with symptoms. TMHA have seven vacancies through their Permanent Supported Housing program which they are reserving as isolation units for their clients if they become symptomatic. Laurel thanked all staff in all agencies who are working so hard in this very difficult time.</p> <p>Bettina informed the Council that she</p>		
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	<p>has been working with the businesses, restaurants and bars that have had to close downtown, and encouraging them to donate any goods that would otherwise spoil. If any providers are looking for food or other goods that could be donated, please reach out to Bettina by email: bettina@downtownslo.com</p> <p>This meeting took place just prior to the County's edict on sheltering in place. The Council discussed the need for guidance around unsheltered people. Laurel confirmed that shelter workers are considered essential and so should continue to go to work. It was not clear if this also applied to volunteers, so Laurel will follow up with the EOC (Emergency Operations Center).</p> <p>Laurel shared the recent announcement that Governor Newsom is trying to make hotels and motels available to shelter homeless people. The State is compiling lists of hotels and motels in different jurisdictions and will provide this to counties. It is not yet clear if there will be funding associated with this.</p>		
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<p>4.3.1 Discussion Item: Prevention and Mitigation Needs</p>	<p>Laurel shared that the County is currently working on getting a standardized screening tool out to shelters. Personal protective equipment is currently in short supply. Shelters are working on ways to safely isolate people by setting aside space and using trailers. The County is continuing to explore all options, including motels. Going forward, HSOC will need to create a working group to look at options and resources. Given the impact on staff both at the County and among providers, fewer HSOC committee meetings may take place, though the Full and Executive meetings will continue as planned.</p>		
<p>4.3.2 Action Item: Vote to authorize the HSOC Executive Committee to vote on grant recommendations, Continuum of Care policies, or urgent matters when action is needed before the next scheduled meeting of the full HSOC</p>	<p>Laurel clarified that this action is to authorize the Executive Committee to make decisions only when the full HSOC cannot be convened, i.e. a quorum cannot be gathered in time. Carlyn asked for this to be clearer in the authorization, and for this to be a standing agenda item so that each quorate meeting of the full HSOC can decide whether or not to reauthorize the Executive Committee.</p>	<p>Carlyn made a motion to authorize the HSOC Executive Committee to vote on urgent matters before the next scheduled meeting of the full HSOC, where a quorum cannot be gathered in time, and that this must be on the agenda for reauthorization by each quorate meeting of the full HSOC. All were in favor.</p>	

5. Committee Reports	The Encampments Committee met, and had planned for the next meeting to focus on trash issues, but the focus will now be on encampments and COVID-19. Future meetings will be held by phone until further notice.		
6. Future Discussion/Report Items			
7. Next Meeting Date	May 6, 2020 at 1pm. This meeting will be held by phone, but there will also be a physical location for those unable to call in: Veterans Hall, 801 Grand Ave, San Luis Obispo		
7. Adjournment	Mariam adjourned the meeting at 3pm.		

HOMELESS SERVICES OVERSIGHT COUNCIL

HSOC Meeting

April 3, 2020 1:00 p.m.

Physical Location: Conference Room 1, Department of Social Services, 3563 Empleo St, San Luis Obispo, CA

Members and the public were also able to participate by phone.

Call In Number: (717) 275-8940

PIN #: 798 2958

MEMBERS PRESENT	MEMBERS ABSENT	STAFF & GUESTS	
Amanda Piper (alt for Theresa Scott) Anne Robin Bettina Swigger Caroline Hall Devin Drake Grace McIntosh Janna Nichols Jeff Smith (alt for Deanna Cantrell) Joe Thompson Kristen Barneich Liz Snyder (alt for Amelia Grover) Mariam Shah Mark Lamore Shay Stewart Steve Gregory (alt for Steve Martin) Susan Funk Tim Waag	Adam Hill Carlyn Christianson Jessica Thomas Marcia Guthrie Marianne Kennedy Marlys McPherson Paul Worsham Scott Smith	Anne Wyatt Dawn Anderson George Solis Jan Maitzen Jeff Al-Mashat Jessica Lorange Laurel Weir Lisa Howe Russ Francis Susan Warren	
AGENDA ITEM		CONCLUSIONS/ACTIONS	FOLLOW UP
1. Call to Order and Introductions	Mariam called the meeting to order at 1pm. Introductions were made.		

2. Public Comment	<p>A message had been passed to County staff from Carlyn Christianson. This meeting and the previous week's took place at 1pm on Friday, which is the same time the SLO City Council's Disaster Council meets (12:30pm-1:30pm). This makes it difficult for SLO City Council employees to attend, so Carlyn requested that HSOC consider another time to meet.</p> <p>Laurel shared that the County has now received information that additional funds will be available for the Emergency Solutions Grant (ESG), from the recently passed CARES (Coronavirus Aid, Relief, and Economic Security) Act. This funding should be available in the next 30 days. Laurel recommended that another full HSOC meeting be held in two weeks' time to discuss planning and make recommendations about the additional funds.</p> <p>Given Carlyn's comment above, it was decided that more options will be provided for meeting times for the next and future HSOC meetings.</p>		
3. Consent: Approval of Minutes	Grace made a motion to approve the minutes from the previous meeting,		

	seconded by Devin. All were in favor.		
4. Action/Information/Discussion			
4.1. Discussion Item: COVID-19 Emergency Homelessness Funding	<p>Laurel outlined the County's recommendations for the Emergency Homelessness Funding. The County has received two award letters from the State – one to the County directly, and one to HSOC. Combined, these funds come to nearly \$555k. Eligible activities for this funding include emergency shelter operations, shelter capacity, isolation capacity, street outreach, transportation and staffing. Additional guidance from the State (since the agenda packet for this meeting was sent out) has been to not use this funding for case management, as the upcoming ESG funding (see item 2) can be used for this instead. Homeless prevention is not an eligible activity under this funding but will be under the ESG funding. Although the funding cannot go towards prevention of homelessness, it can be used for preventing the spread of infection among unsheltered homeless people, such as by installing handwashing stations and showers. County Staff recommend the following activities:</p>		

	<ol style="list-style-type: none"> 1. Increasing isolation capacity for people who are homeless and have either tested positive for COVID-19 or are at high risk of medical complications if they become infected (e.g. those age 65+ and those with preexisting conditions). 2. Wrap around services to ensure homeless people have food, transportation, and access to other services. These wrap around services can include security assistance and monitoring of people placed in motels. 3. Street outreach, to prevent the spread of COVID-19 among the large number of unsheltered homeless people in the County. <p>To ensure regional parity of funding, County Staff recommend that HSOC follow an average of the last four PIT (Point In Time) counts. The recommendations in the agenda packet are based on these figures.</p> <p>The Council discussed safe parking programs, which this funding could be used for. Two such programs have been launched by the County, in SLO</p>		
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	<p>City and Los Osos, with a further program proposed in North County. Laurel confirmed that all safe parking programs in the County are being operated in the same way. The ReadySLO website has information on locations of safe parking programs: https://www.emergencyslo.org/en/safe-parking-program.aspx</p> <p>Nonprofit service providers could partner with a transportation company to get funding for safe parking programs.</p> <p>The County is still waiting for information from the State on the timeline for this funding but should have this within the week commencing April 6. This information includes which expenses that will be reimbursable.</p> <p>Jan Maitzen stated that the North County may be underrepresented in the PIT count as this region became involved later than other regions. Jan also reported that the Atascadero warming center closed on March 31, and Transitional Food & Shelter are no longer carrying out street outreach, as all their outreach workers are among vulnerable populations. Jan therefore requested that homeless people in</p>		
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	<p>Atascadero are duly considered among funding applicants.</p> <p>Laurel confirmed that nonprofit service providers can apply for this funding for motel placements which would be in addition to the County's own placements. Providers can establish their own contracts with hotels and motels. The County would want to see plans for security, transportation and food provision in an application for funding to be used for this purpose.</p> <p>The State's time frame for how long these funds should last is up to six months.</p> <p>People who have gone to hospital for a coronavirus infection, have since been released and are in recovery, are eligible for this funding.</p> <p>Janna and Jeff raised the issue that there is no clarity about whether tents are allowed in safe parking areas. This is particularly an issue with warming centers closing and the County expecting rainfall. Laurel to follow up with the EOC (Emergency Operations Center) and report back.</p>		
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4.1.1. Action Item: Vote on recommendations for prioritization and allocation of San Luis Obispo County Continuum of Care's (CoC-614) COVID-19 Emergency Homelessness Funding Allocation	<p>Susan Funk made a motion to approve the staff recommendations for priorities for the funding, with "case management" removed from item 2, given the recent guidance from the State. The priorities are:</p> <ul style="list-style-type: none"> • Isolation Capacity • Staffing and wrap around services in support of isolation capacity • Street Outreach <p>Shay Stewart seconded. The motion passed. All were in favor.</p>		
5. Adjournment	<p>Laurel asked that staff from the cities please let County staff know if they are currently having emergency meetings outside of normal meeting hours, so that the County is able to plan HSOC meetings that do not clash with these. Please email rfrancis@co.slo.ca.us with this information.</p> <p>Mariam adjourned the meeting at 1:50pm.</p>		

**HOMELESS SERVICES OVERSIGHT COUNCIL
ACTION ITEM
MAY 6, 2020**

AGENDA ITEM NUMBER: 4.2

ITEM: VOTE TO RECOMMEND PROJECTS FOR STATE PASS-THROUGH OF FEDERAL EMERGENCY SOLUTIONS GRANT.

ACTION REQUIRED:

Vote to recommend proposed projects for State of California Department of Housing and Community Development (HCD) pass-through of federal Emergency Solutions Grant (ESG) funds.

SUMMARY NARRATIVE:

The federal ESG program, authorized by the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, provides funds to: (1) engage homeless individuals and families experiencing homelessness; (2) improve the quality of emergency shelters for homeless individuals and families by helping to operate these shelters and provide essential services to shelter residents; (3) rapidly re-house homeless individuals and families experiencing homelessness, and (4) prevent families/individuals from becoming homeless.

ESG funding is distributed to States and local entitlement jurisdictions. California distributes its ESG funds to two type of entities, CoC's and non-entitlement jurisdictions. The State Department's newly redesigned State ESG Program aims to align with local systems' federal ESG and HEARTH goals, invest in impactful activities based on key performance goals and outcomes, improve geographic distribution of funded activities and continuity of funded activities, and create a streamlined delivery mechanism. The program emphasizes the involvement of local Continuums of Care (CoC) and ESG entitlement entities in the funding distribution process. The State has approved the County of San Luis Obispo to act as the Administrative Entity (AE) for the State ESG program funds in collaboration with the County of San Luis Obispo CoC.

On February 28, 2020, HCD released a Notice of Funding Availability (NOFA) for Emergency Solutions Grant funds for Continuums of Care. The preliminary 2020 ESG Allocation for the San Luis Obispo County CoC in the NOFA is shown in Table 1:

Table 1: Preliminary Estimated HCD ESG (Federal Pass-through only) Allocation for San Luis Obispo County CoC

CoC #	CoC Name	2020 Total CA CoC ESG Allocation	2020 CA CoC ESG Admin	Minimum for Rapid Rehousing	Balance for other activities (RR, ES, HP, SO)
614	San Luis Obispo County CoC	\$ 119,621	\$ 3,366	\$ 46,502	\$ 69,753

The County Department of Social Services released the local Request for Proposals on March 12, with a due date of April 21, 2020, for \$116,255. This amount is the preliminary estimate from the State as to how much will be made available to the CoC. The final amount available may change once the State receives its allocation from HUD.

Federal ESG-funded activities may serve the entire service area of the CoC but must serve non-entitlement areas within the service area. An entitlement area as defined by HUD is as follows: "metropolitan cities with populations of at least 50,000; and qualified urban counties with a population of 200,000 or more". San Luis Obispo County is considered an entitlement area. A non-entitlement area is one that does not qualify as an entitlement area or is located within an entitlement jurisdiction but has elected not to participate. The City of Grover Beach has elected not to participate in the Urban County's entitlement jurisdiction.

The State RFP requires that a minimum of 40% of the funds must be used for Rapid Rehousing. A maximum of 10% may be used for Homeless Management Information System activities. Rental assistance payments provided as part of RR or HP activity typically may not exceed HUD's Fair Market Rent (FMR) and must comply with rent reasonableness standards established by HUD under 24 CFR Part 982.507.

Funded applicants must make matching contributions in an amount that equals the amount of federal ESG funds awarded. ESG match is provided by the applicant on a dollar for dollar basis. Specific sources of match or leverage are identified at the time of application and must comply with 24 CFR 576.201. The primary sources of match identified for this funding round for ESG include local match funding (such as cities and counties), private match funding including cash fundraising, federal match funding, and donated goods, volunteers, building value or lease.

Provider Selection Process

On March 12, 2020, the County issued an RFP. The County received one application. This was a combined application from the 5Cities Homeless Coalition (5CHC), the El Camino Homeless Organization (ECHO), and the Community Action Partnership of San Luis Obispo (CAPSLO). The application met the threshold requirements for State Regulation Core Practices (Section 8709),

which include Housing First/low-barrier practices, and the application was scored based on the criteria scoring guideline in Section 8407.

Table 2: 2020 Pass Through ESG Requests from Respondents to the RFP

ESG Requests		
Applicant	Project	Recommendation
5Cities Homeless Coalition, together with CAPSLO and ECHO	Emergency Shelter, Street Outreach, Rapid Re-Housing	\$116,255

A non-conflicted ad hoc Grant Review Committee (Committee) met on April 27, 2020 to discuss the recommendations for the state's pass-through ESG funding. Using the State's criteria, the Committee considered applicant experience, need for funds, program design, impact and effectiveness, cost efficiency, and State objectives. The Committee also considered the needs and priorities identified in the May 2018 HSOC recommendations to the Board of Supervisors.

The Committee recommended the following awards listed in Table 3.

Table 3: HSOC Ad Hoc Grant Review Committee Recommendations

FEDERAL PASS-THROUGH ESG RECOMMENDATIONS		
Applicant	Project	Recommendation
5Cities Homeless Coalition, together with CAPSLO and ECHO	Emergency Shelter, Street Outreach, Rapid Re-Housing	\$116,255
PROJECT TOTAL		\$116,255
Administrative Entity	Administration and staffing	\$3,366
TOTAL ALLOCATION		\$119,621

There was unanimous consent from the committee that the recommended project offered a collaborative approach and covered all regions of the county.

BUDGET/FINANCIAL IMPACT:

If successful, the application may result in approximately \$119,621 in additional grant funds being secured.

STAFF COMMENTS:

It is important to clarify that the funding being awarded through the current RFP process is separate from the ESG funding allocations that the HSOC voted on in December 2019. The U.S. Department of Housing and Urban Development (HUD) distributes ESG funding annually via a formula block grant to states, and local governments that qualify to be entitlement communities for purposes of the ESG, Community Development Block Grant, and HOME grant. As an entitlement community, the County receives ESG funding directly from the HUD for use in the Urban County.

Each of the seven incorporated cities in the county may either choose to participate in the Urban County for purposes of qualifying for the ESG and the other HUD administered block grants noted above, or a city may opt out of the Urban County entitlement and apply through a competitive process for Balance of State ESG and other block grant funds. If a city opts out of participating in the Urban County, ESG entitlement funds received directly from HUD by the County may not be used to serve people in that city.

The State of California allocates its ESG funding to serve areas in the state that are not ESG entitlement communities. This is done through two mechanisms. The first is a competitive Balance of State allocation. The second is through a formula grant allocation from the State to Continuums of Care (CoCs). CoC that receive ESG funds from the State must guarantee that portion of the funds used will fund services that are accessible to homeless persons in cities in the CoC that opted out of the Urban County.

The funds being made available through the current NOFA and RFP are the CoC funds passed through by the State. For the pass through funds, the State has estimated the funding that will be available. The amount available to the San Luis Obispo Continuum of Care may change once the final amount allocated to the State from HUD is known. If the final award amount exceeds the estimated CoC allocation, staff recommends the final award be adjusted proportionately.

ATTACHMENT:

- A. Notice of Funding Availability – FY2020 Preliminary CoC Award

Appendix A: Estimated Continuum of Care Allocation

2020 Estimated CoC Allocation*						
	CoC #	CoC Name	Grant Admin	Minimum of 40% for RR	Balance for other activities (RR, ES, HP, SO)	2020 ESG Formula Allocation
1	604	Bakersfield/Kern Co CoC	\$7,368	\$101,789	\$152,683	\$261,840
2	512	Daly/San Mateo Co CoC	\$5,248	\$72,500	\$108,751	\$186,499
3	514	Fresno/Madera Co CoC	\$7,957	\$109,916	\$164,873	\$282,746
4	600	Los Angeles City & Co CoC	\$31,543	\$435,746	\$653,620	\$1,120,909
5	502	Oakland/Alameda Co CoC	\$10,280	\$142,014	\$213,021	\$365,315
6	611	Oxnard/San Buenaventura/ Ventura Co CoC	\$4,536	\$62,665	\$93,997	\$161,198
7	505	Richmond/Contra Costa Co CoC	\$7,749	\$107,041	\$160,562	\$275,352
8	608	Riverside City & Co CoC	\$8,490	\$117,282	\$175,923	\$301,695
9	503	Sacramento City & Co CoC	\$6,067	\$83,808	\$125,712	\$215,587
10	506	Salinas/Monterey, San Benito Counties CoC	\$6,817	\$94,169	\$141,254	\$242,240
11	609	San Bernardino City & Co CoC	\$8,427	\$116,409	\$174,613	\$299,449
12	601	San Diego City and Co CoC	\$11,276	\$155,770	\$233,654	\$400,700
13	500	San Jose/Santa Clara City & Co CoC	\$11,711	\$161,784	\$242,677	\$416,172
14	614	San Luis Obispo Co CoC	\$3,366	\$46,502	\$69,753	\$119,621
15	602	Santa Ana/Anaheim/Orange Co CoC	\$18,018	\$248,906	\$373,359	\$640,283
16	603	Santa Maria/Santa Barbara Co CoC	\$8,783	\$121,325	\$181,988	\$312,096
17	504	Santa Rosa/Petaluma/ Sonoma Co CoC	\$5,995	\$82,820	\$124,229	\$213,044
18	511	Stockton/San Joaquin Co CoC	\$5,464	\$75,477	\$113,216	\$194,157
19	510	Turlock/Modesto/Stanslaus Co CoC	\$7,560	\$104,444	\$156,665	\$268,669
TOTAL						\$6,277,572

*Estimates are based on HCD's 2019 ESG allocation. Amounts are subject to award of 2020 ESG funds by HUD to the State and will be finalized prior to issuance of Standard Agreements to State grantees. Note: Allocations are also subject to change if AEs or CoCs do not continue to participate for 2020.

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
ACTION ITEM
May 6, 2020

AGENDA ITEM NUMBER: 4.3.1

ITEM: Approve the revised San Luis Obispo County CoC HMIS Privacy Notice and HMIS Privacy Posted Notice

ACTION REQUIRED: Vote on the recommendation of the HSOC Finance and Data Committee to approve the revised the San Luis Obispo County CoC HMIS Privacy Notice and HMIS Privacy Posted Notice.

SUMMARY NARRATIVE:

[HUD's HMIS Privacy and Security Standards](#) specify the guidelines for the privacy and security of personal information collected and stored in an HMIS. The standards require each covered homeless organization (CHO) to publish a privacy notice. The standards establish baseline privacy requirements for CHOs. A CHO must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. Consent of the individual for data collection may be inferred from the circumstances of the collection.

On March 27, 2020 HUD released [HMIS Privacy and Security Standards and COVID-19 Response](#) as guidelines to protect a participants personally identifiable information (PII) but also allow for uses and disclosures for specific situations. The CoC is increasing receiving requests from the state to share client level data for purpose of program evaluation. The state is also requiring the CoC's to enter into a data use agreement to share HMIS data for state funded projects.

Due to these data sharing requirements, staff worked with HUD Technical Assistance to ensure the San Luis Obispo County CoC's HMIS Privacy Notice and HMIS Privacy Posted notice were in compliance with HUD's HMIS Privacy and Security Standards.

On April 15, 2020, HUD TA provided feedback and recommendations to staff to have a comprehensive privacy notice.

On April 28th, County Counsel reviewed and approved both the HMIS Privacy Notice and HMIS Privacy Posted Notice.

On April 29th, the HSOC Data and Finance Committee reviewed and voted to approve both the HMIS Privacy Notice and HMIS Privacy Posted Notice and send to the full HSOC for approval.

BUDGET/FINANCIAL IMPACT:

No financial impact to the HSOC

STAFF COMMENTS:

Staff recommend that this item be adopted to ensure compliance with federal CoC regulations.

HMIS PRIVACY NOTICE

This Notice applies to all SLO County HMIS-Participating Providers and addresses how information about clients may be used and disclosed at Providers as well as client rights over their information. This Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment.

A. 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 homeless individuals and families and persons at risk of homelessness. Providers participating in an 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 assess services, 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 is an HMIS-participating homeless service provider (“HMIS Provider”), meaning we collect and enter information about the persons we serve in the private and secure the County HMIS (HMIS) database, the local HMIS for this community. There are firm policies and procedures in place to protect against unauthorized disclosure of any personal information collected, and this information is critical to obtain an accurate picture of the homeless population we serve and for this agency to continue to offer you the service(s) you are accessing today. We 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. We do not need your consent to enter a record of your visit into the HMIS, but you may refuse to have your personal identifying information within this record and still be eligible to receive services.

If you have any concerns or questions about the information provided above, please speak to an intake worker.

B. PERMITTED DATA 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 (PII is any information that can be used to identify a particular individual, including a client’s name, Social Security Number, and Date of Birth). 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 client PII; **disclosures** occur when providers share PII with an external entity). **HMIS Providers are limited to the following circumstances for the use and disclosure of HMIS PII:**

HUD required:

- (1) Client access to their information; and
- (2) Disclosures for oversight of compliance with HMIS privacy and security standards.

HUD permitted:

- (3) To provide or coordinate services to an individual;
- (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;
- (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 victims of abuse, neglect or domestic violence;
- (10) Uses and disclosures for research purposes; and
- (11) Uses and disclosures for law enforcement purposes.

A client must provide prior written consent for any other use or disclosure of HMIS PII.

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.

C. CLIENT CONTROL OVER DATA

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 entered into a record 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:**

- » **Refusal:** to refuse to answer a question you do not feel comfortable with and not have it recorded within HMIS;
- » **Access/Correction:** to request and view a copy of your project information record within HMIS from your provider, including those who have accessed and/or edited your record, and to request corrections to that record;
- » **Grievance:** to ask questions of or submit grievances to your provider regarding privacy and security policies and practices;
- » **Anonymized Record:** to request that your provider anonymize your personal data record within HMIS; and
- » **Optional Data Sharing:** to choose if your information is shared outside of HMIS with researchers and other providers, and to make this decision at each project you receive services from. (Please note that if you decide NOT to data share, it does not prohibit the project from entering your data into HMIS – it prohibits the sharing of your data as outlined on the consent form).

HMIS Providers reserve the following exceptions to the above: (1) Provider Right to Deny Review: if information is compiled in reasonable anticipation of litigation or comparable proceedings; if information about another individual other than the participating provider staff would be disclosed; 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 if the disclosure of information would be reasonably likely to endanger the physical safety of any individual; and (2) Provider Right to Deny Access/Correction: in response to repeated or harassing requests.

D. RESPONSIBILITY TO PROTECT DATA

The County of San Luis Obispo Department of Social Services is the System Administrator of HMIS. HMIS uses Belldata Technology's software application and database, which is maintained in compliance with all federal standards set forth in the Health Insurance Portability and Accountability Act (HIPAA) and its subsequent legislation – the standards required to protect medical records – as well as U.S. Department of Housing and Urban Development HMIS standards.

The County HMIS staff take the protection of client confidentiality and privacy seriously. **The following security measures, among others, are in place to ensure that your information is protected:**

- » **System Security:** HMIS data is encrypted and securely transmitted from Providers to the HMIS database, extensive procedures are in place to prevent unauthorized access, and the entire HMIS system and database is protected at the highest level of security for health data;
 - » **Access:** Only County HMIS staff and staff at providers may receive authorization to access HMIS, and authorization requires comprehensive initial training and annual privacy and security training thereafter;
 - » **Confidentiality Agreements:** Every HMIS Provider and every person authorized to read or enter information into HMIS signs an agreement every year that includes: (1) commitments to maintain the confidentiality of all HMIS information; (2) commitments to comply with all security measures in compliance with federal HMIS requirements and any applicable federal, state, or local laws; and (3) penalties for violation of the agreement;
 - » **Monitoring:** Annual monitoring is conducted for HMIS providers to ensure compliance with privacy and security policies; and
 - » **Reporting:** Published HMIS reports are comprised of aggregate data only, and never contain any client-level or identifying (PII) data.
-

IMPORTANT INFORMATION FOR ALL CLIENTS – PLEASE READ

If you do not understand any of the information within this form, you may ask your intake worker for further explanation or an alternate format.

You may **keep the first 2 pages** of this form (containing the HMIS Privacy Notice) for your records.

You may request a copy of any participating provider or HMIS policies from your intake worker.

You may contact your participating provider regarding any of your rights as listed above, including if you feel that any of these rights have been violated. If your provider's response does not satisfy you, you may then contact County HMIS staff directly at ss_hmissupport@co.slo.ca.us.

DRAFT

HMIS Privacy Posted Notice

We collect personal information directly from you for reasons that are discussed in our Privacy Notice. We may be required to collect some personal information as mandated by law or as requested from organizations that fund this program. Personal information we collect is necessary to operate programs, improve services and better understand the needs of homelessness at the local level. We collect appropriate information only. A Privacy Notice is available upon request.

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
ACTION ITEM
May 6, 2020

AGENDA ITEM NUMBER: 4.3.2

ITEM: Approve the San Luis Obispo County CoC HMIS Data Quality Plan

ACTION REQUIRED: Vote on the recommendation of the HSOC Finance and Data Committee to approve the San Luis Obispo County CoC HMIS Data Quality Plan.

SUMMARY NARRATIVE:

On April 2017, HUD released the [CoC Data Quality Brief](#) to help guide Continuum Of Care's efforts in improving HMIS Data Quality. To end homelessness, a community must know the scope of the problem, the characteristics of those who find themselves homeless, and understand what is working in their community and what is not. A Data Quality Plan is a systematic approach for the CoC to establish and define data quality expectations. Solid data enables a community to work confidently towards their goals as they measure output, outcomes, and impacts.

HMIS Data Quality has become a scoring criteria for the CoC Program Competition. Implementing a HMIS Data Quality Plan will assist the CoC in being more competitive in the application process.

Staff collaborate on a monthly basis with HMIS participating agencies to review and correct any HMIS data discrepancies. The HSOC Finance and Data committee reviews CoC data quality on a quarterly basis to identify any data weaknesses and collaborates with staff on recommendations for improvement. While the CoC is already implementing most of these processes, HUD TA recommended that we formalize our policies into a Data Quality Plan.

On April 15, 2020, HUD Technical Assistance provided feedback and recommendations to staff to implement a comprehensive HMIS Data Quality Plan. It was recommended that the CoC reduce its current data timeliness requirements of 14 days to enter HMIS data to 3 days. This change might have a slight impact at implementation on HMIS participating agencies.

On April 29th, the HSOC Data and Finance Committee reviewed and voted to approve the HMIS Data Quality Plan and send to the full HSOC for approval. The committee recommended clarifying the data timeliness language from 3 days to 3 business days to account for clients entering or exiting projects over the weekends.

BUDGET/FINANCIAL IMPACT:

No financial impact to the HSOC

STAFF COMMENTS:

Staff recommend that this item be adopted to improve outcomes and increase our competitiveness in the CoC application process.

San Luis Obispo County Continuum of Care Homeless Management Information System (HMIS) Data Quality Plan

Introduction

To end homelessness, a community must know the scope of the problem, the characteristics of those who find themselves homeless, and understand what is working in their community and what is not. Solid data enables a community to work confidently towards their goals as they measure output, outcomes, and impacts.

What is a Data Quality Plan?

A Data Quality plan is a systematic approach for the CoC to establish and define data quality expectations. Data quality is a key component for HUD reporting purposes such as the System Performance Measures (SPM), Longitudinal Systems Analysis Report (LSA), Annual Performance Report (APR), Point-In-Time (PIT), Housing Inventory Count (HIC) as well as reporting purposes for the federal partners. In addition, HUD ties data quality to overall CoC competitiveness for funding.

Data Quality Elements

HMIS Data Standards

The [2020 HMIS Data Standards](#) provide communities with baseline data collection requirements developed by HUD and its federal partners.

A. Universal Data Elements

HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source. The Universal Data Elements establish the baseline data collection requirements for all contributing CoC projects. They are the basis for producing unduplicated estimates for the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stays and homelessness over time.

The most current Universal Data Elements are listed in the [2020 HMIS Data Standards Manual](#).

B. Program Specific Data Elements

Program Specific Data Elements differ from the Universal Data Elements in that no one project must collect every single data element.

The most current Program Specific Data Elements are listed in the [2020 HMIS Data Standards Manual](#).

Data Quality Benchmarks

Policy

In order to qualify as “participating in the HMIS” all HMIS Participating Agencies must meet the data quality benchmarks as described in the San Luis Obispo Continuum of Care’s HMIS Data Quality Plan. These benchmarks apply to all HMIS Participating Agencies whether or not the agency provides the data directly into the HMIS or submits it to the HMIS Lead Agency for input into HMIS. Including the following mandated projects HUD CoC & ESG, VA SSVF & GPD-OTH, and HHS RHY & PATH.

HMIS Coverage

Definition

The degree to which all homeless assistance providers within the CoC enter all homeless clients into HMIS.

Rationale

Partial participation across the CoC geography can negatively affect the ability of the CoC to report and analyze community performance. If some providers are not participating in the HMIS, it will be difficult to determine whether the data accurately reflects what is happening within projects or across the system.

Required Benchmarks:

1. 100% of all HUD funded homeless assistance programs (excluding Domestic Violence programs) must participate in HMIS.
2. 100% of all beds in non-funded projects.

Bed Utilization

Definition

The degree to which the total number of homeless beds within the HMIS are recorded as occupied divided by the total number of homeless beds within the CoC.

Rationale

Utilization rate, or the number of beds occupied as a percentage of the entire bed inventory, is an excellent barometer of data quality. It is difficult to measure data quality if the utilization rate is too low (below 65%) or too high (above 105%) without a reasonable explanation.

Required Benchmarks:

Housing Program Type	Target Utilization Rate
Emergency Shelter	85%
Transitional Housing	85%
Permanent Housing	85%

Data Completeness

Definition

The degree to which all required HMIS Universal Data Elements and Program Specific Data Elements are recorded in the HMIS.

Rationale

Partially complete or missing data (e.g. SSN digits, year of birth, disability or veteran status) can negatively affect the ability to provide comprehensive services and could mean participants do not get the help they need to become permanently housed. It also makes it difficult to unduplicate the number of clients served.

Required Benchmarks:

The required benchmarks reflect the [2020 HMIS Data Standards](#).

Data Timeliness

Definition

The degree to which the data is collected and recorded into HMIS.

Rationale

Entering data in a timely manner can reduce human error when too much time has elapsed between data collection and date entry. Also, when a user exits a person from one program and enters them into another, this may affect outcomes such as income. Timely data entry assures data is accessible when it is needed (e.g. monitoring purposes, funding reporting, responding to requests for information).

Required Benchmarks:

HMIS data must be entered into HMIS in real time or within three (3) business days from the point of the event, (intake/ enrollment, service delivery, annual assessments, or exit/ discharge) to record the information into the HMIS software.

Data Accuracy

Definition

The degree to which the data reflects the real-world client or service.

Rationale

To ensure data is collected and entered accurately. Accuracy of data in HMIS can be difficult to access. It depends on the client's ability to provide the correct data and the intake worker's ability to document and enter the data accurately.

Required Benchmarks:

100% of data entered into HMIS must reflect what clients are reporting.

Data Consistency

Definition

The degree to which the data is equivalent in the way it is collected and stored.

Rationale

To ensure that data is understood, collected, and entered consistently across all programs in the HMIS.

Consistency directly affects the accuracy of data; in an end user collects all the data, but does not collect it in a consistent manner, and then the data may not be accurate.

Required Benchmarks:

100% of data in the HMIS should be collected and entered in a consistent manner across all programs. Data collection and entry should be conducted in accordance with the most current HUD HMIS Data Standards.
