Slide 1

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Slide 2 – Comparable Databases

Hello and welcome to Part 7 of Violence Free Minnesota's Housing 101 for Victim Service Providers series, entitled Comparable Databases. My name is Twyla Olson. I am the Technology Innovation Project Program Manager for Violence Free Minnesota, and I will be your host for this session. It will be most useful for agency administrators and people who are involved with funding decisions, grant writing and reporting.

So far in this series we have covered affordable housing models, the HUD Continuum of Care and its funding, and survivor confidentiality in relation to housing. We've touched on the Homeless Management Information System, or HMIS, that most providers must use, except for victim service providers, or VSPs, who must instead use a database that is comparable in most respects to HMIS. Today we'll provide an overview of what a comparable database is, why it's required, who is required to use it, what it is used for, and what VSPs can expect to encounter when implementing it. This is ***not*** a comprehensive training on

comparable databases, but rather a brief overview. A lot of the information in this session has been pulled directly from publicly available resources which will be noted on our resource page.

Slide 3 – HUD Data Collection Requirements: Homeless Management Information System (HMIS)

A Homeless Management Information System, or HMIS, is a locally administered data system used to record and analyze client, service, and housing data for individuals and families who are unhoused or at risk of experiencing houselessness. The U.S. Department of Housing and Urban Development, or HUD, and other policymakers use HMIS data to better inform homeless policy and decision making at the federal, state, and local levels. HUD envisioned HMIS as a way for communities to create data-driven solutions to ending houselessness in communities. HMIS assists agencies providing services to people who are unhoused to coordinate care, manage their Continuum of Care and Emergency solutions resources, and report outcomes to HUD.

To accomplish this, HUD is seeking detailed information about the people who receive HUD support, including demographics, services provided, program

outcomes and detailed information about program participants' personal data. We already know that victim service providers, or VSPs, are prohibited from entering client-level data into HMIS and must use a comparable database. Let's briefly review what the HMIS is, and its data requirements.

Slide 4 – Homeless Management Information System (HMIS)

We know that HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to unhoused individuals and families and persons at risk of becoming unhoused. In other words,

- HMIS is a centralized and shared database. This means that it records and tracks system-wide data, not just data that is specific to one provider. Many different providers and stakeholders can access and view the database contents.
- Each Continuum of Care, or CoC, is required to establish an HMIS system with an HMIS lead to manage it. In Minnesota, all 10 CoCs use the same HMIS database, managed by the Institute for Community Alliances, or ICA, as the HMIS lead.

- HMIS allows for access and information sharing with others participating in the HMIS.
- For instance, individual providers have licenses to access HMIS. Once they have a license, they can enter information, view that information, and in some cases, view information entered by other providers.
- While this level of data sharing and system access is beneficial for HUD to help with system-wide coordination of services, program evaluation, and other programmatic needs, it is obviously not a confidential system.

Slide 5 – Types of Data

It's important to know what type of data HUD is seeking. In this session we will refer to three types of data.

- Aggregate data is information about a group as a whole and not any specific person. For instance, an aggregate report could include the number of survivors that a victim service provider, or VSP, served during a particular time period, the percentage of those survivors who received certain services, and the percentage of those survivors who fit into certain demographic categories.

- De-Identified Data is program participant-level data about a specific person, that has been stripped of identifiers such as name, address, date of birth, and so on.
- Personal Identifying Information, or PII, is identifying information on individuals, including information that could potentially disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking.
- It can include detailed information, such as first and last name, social security number, address, date of birth, demographic information, household members, medical conditions and more.
- However, VSP staff must be alert to the possibility that some data classified as de-identified or even aggregate data can actually fall into the PII category, depending on circumstances and the makeup of the community. Any data that could potentially identify an individual is not de-identified or aggregate data. Sometimes, even if the data is stripped of the person's name or address, it can be possible to deduce the participant's identity from other data that is generally viewed as de-identified or aggregated. For example, particularly in a small community, there may be a limited pool of immigrant residents, or

residents belonging to a particular racial or ethnic group. Even reporting that the VSP served someone from one of those communities can reveal their identity and location, compromising their safety.

Finally, every participant should be advised that they can refuse to provide any information and that they cannot be denied services if they refuse. Survivors should be fully informed about the reason information is being requested, how it will be used and of their right to refuse.

Slide 6 – Victim Service Provider Confidentiality Duties: Data Reporting, Collection, Evaluation

The reason HUD requires that VSPs use a comparable database rather than HMIS is to protect survivor confidentiality, and thus, their safety. We talked about VSP duties in relation to this in the last session, so we'll cover it only briefly here.

Slide 7 – Applicable Confidentiality Laws

The Violence Against Women Act, or VAWA, the Family Violence Prevention & Service Act, known as FVPSA, and the Victims of Crime Act, often called VOCA, contain strict confidentiality requirements that all grantees must observe. All

grantees or subgrantees of these agencies are prohibited from disclosing or revealing any personal identifying information in a shared database such as HMIS. These provisions are intended to protect the safety and privacy of survivors of domestic violence, sexual assault, stalking and trafficking who receive services. Most VSPs are grantees or subgrantees of these acts, and even if not, are encouraged to adhere to these confidentiality standards.

This means that VSPs are prohibited from disclosing, revealing, or releasing individual program participant information that was collected in connection with services that were requested, utilized, or denied through the VSP's program, regardless of whether the information has been encoded, encrypted, hashed, or otherwise protected.

The only exceptions are the written, time-limited, specific consent of the survivor, if required by a court order; or when disclosure is mandated by statute, such as reporting child abuse.

- Funders cannot require VSPs to share any personally identifying information, or PII, to comply with federal, tribal, or state reporting, evaluation, or data collection requirements.

- VAWA also prohibits requiring anyone to sign a release of information as a condition of receiving services.

The only information that ***can*** be shared is aggregate information, which by definition does not contain any data on individuals or PII. But it's very important to remember that although aggregate data does not include participant-level data, it's possible that this level of data can show up in aggregate reporting. VSPs must carefully review their aggregate reports before sharing them to ensure that they do not include any PII.

Slide 8 – The Comparable Database Requirement

We've learned a little about HMIS, how it impacts data collection and sharing of information about survivors of violence, and why VSPs are not permitted to use it. Let's now turn to the alternative: comparable databases.

Slide 9 – The Comparable Database Requirement

Since HMIS is not a confidential database, VSPs must use a database that is comparable in all other respects. According to HUD, a comparable database is a

relational database that meets all HMIS Data Standards and does so in a method that protects the safety and privacy of the survivor.

Slide 10 – A Comparable Database Generally…

A comparable database is a database that looks like and acts like HMIS EXCEPT…

- It is NOT a shared or centralized database. It is a stand-alone system unique to each VSP grantee.
- Each VSP owns their own comparable database that must be purchased from the private market.
- And unlike HMIS, must build in protections so that no one outside of the VSP, including the HMIS Lead or other providers, can access the VSP's comparable database.

Slide 11 – Comparable Database Characteristics

Three basic requirements of a comparable database are that it must be a relational database; it must meet all HMIS data standards, including reporting requirements, and that it must adhere to all the confidentiality requirements mandated by the VAWA, FVPSA, VOCA, and HUD.

Slide 12 – HMIS Equivalent: Relational Database

A relational database is defined as a collection of information that organizes data points with defined relationships for easy access and reporting.

HUD specifically notes that Excel sheets and Google docs are not relational databases. They collect information but do not have the capability of organizing, sorting, and cross connecting information in a way that meets the definition of a relational database.

Slide 13 – HMIS Data Standards

A comparable database is meant to function in the same way as an HMIS system and must meet all HMIS Data Standards.

This means that the comparable database must be able to collect all fields, or data elements, by the kind of project it is, such as Emergency Shelter, Rapid Re-Housing, and so on. It must also allow the user to enter specific data at multiple data collection stages, for example, record creation, project start, status update, annual assessment, and project exit, to support reporting and performance measurements.

The database must permit grantees or subgrantees to gather and record specific data elements about their organization, their HUD grant program, the specific projects that are funded, the services they provide under that funding, and the individuals they work with under each of their funded projects. The HMIS data standards require that this information be recorded in specific fields with specific drop-down options.

- The HMIS data standards also require that the comparable database has the same functional capacity as HMIS. For example, the comparable database must have the capacity for de-duplication, dynamic household linking, cross-project data sorting, and meta-data requirements. This means that, for instance, when a user updates a piece of information in the database, such as a participant's address, the new information must appear, but the old information must be preserved and recorded in a specific format within the database.
- The HMIS data standards are complicated but are outlined in HUD's Data Standards Manual. A link to the manual will be provided on the resource page connected to this session.

<u>Slide 14 – HMIS Standards : Reporting</u>

Comparable databases must also meet HMIS reporting standards.

CoC and ESG funded projects require two main reports. CoC funded projects require the Annual Performance report, or APR. ESG funded projects require the Consolidated Annual Performance and Evaluation Report, or CAPER. Each report requires the inclusion of specific data elements, which must be arranged and coded in a specific format outlined by HUD. Additionally, APR and the CAPER reports must be generated in comma-separated value format, referred to as CSV.

All APR and CAPER reports must be submitted to HUD through an electronic portal called SAGE. If a report is not in proper CSV format, SAGE will reject the report.

To comply, a comparable database must be able to generate aggregate reports from their comparable database, in CSV format, and upload those reports to SAGE.

Slide 15 – Confidentiality Requirements

A comparable database must also comply with the VAWA, FVPSA, VOCA confidentiality requirements, and any other applicable confidentiality laws. These

laws prohibit the sharing or disclosure of a survivor's personally identifying information, or PII.

A VSP must take reasonable precautions to prevent this information from being shared via the comparable database. A comparable database must have protections in place to prevent information disclosure to third parties, including the database vendor itself or other third-party vendors such as a cloud-based data storage provider.

HUD specifies certain requirements to ensure privacy and confidentiality of survivor PII.

First the VSP, *and only the VSP, not the* vendor or any other third party, must own the data that is entered into their database.

Next, the database must have security features that prevent data breaches and protect the contents of the database from outside exposure, for example, data encryption, automatic time-out functions, username, and password requirements, and so on.

And finally, the system should not allow third-party access to the data, including by the database vendor. This also applies to other VSPs, even if they are working with the same survivor, or using the same system. They must not have the ability to access one another's databases.

HUD has prepared a comparable database manual, including a vendor checklist, to provide guidance to VSPs and vendors about confidentiality requirements and other data standards. A link to these documents is included in the resource page connected to this session, along with information about available technical assistance.

Slide 16 – Comparable Database Challenges and Considerations

Some VSPs have been reluctant to pursue Emergency Solutions Grant or Continuum of Care funding because of the comparable database requirement. It can be daunting, but perhaps we can demystify it and suggest how programs can access technical assistance to support acquisition and development of a comparable database.

Slide 17 – Comparable Database Challenges

It is true that implementing a comparable database presents challenges. First, we know that HUD requires that grantees and subgrantees gather and store extensive information from program participants. VSPs generally take the approach that limiting this type of data collection as much as possible is necessary to provide safe, trauma-informed, and survivor-centered services. It can be difficult for many VSPs to reconcile the HUD requirements with their overall service philosophy.

Next, a comparable database must be purchased from an unregulated private market. HUD does not provide grantees or subgrantees with comparable databases, provide a list of acceptable databases, or step in to prevent companies from advertising a product as HMIS compliant even if it doesn't meet HMIS standards.

This means that VSPs are individually responsible for identifying a comparable database and assessing whether it is HMIS compliant, a time-consuming and complex process. Many VSPs lack the internal expertise to make this assessment, although the HMIS lead is a good source of information and support in making this determination, and ultimately must do so.

There can also be substantial costs associated with comparable databases, including set-up, data migration, licensing fees and technical assistance.

It may also be necessary to devote extensive staff time to comply with the database requirement. In addition to vetting and purchasing a comparable database, additional staff time will be needed to set it up, learn how to operate it, trouble-shoot issues, and conduct ongoing monitoring activities. HUD reporting and comparable database standards can mean that these steps can be more time-consuming when dealing with a comparable database versus other databases.

Also, unfortunately, many databases that vendors hold out as comparable databases are not user friendly for VSPs, and in some cases, are not even compliant with basic HUD standards. For instance, some databases meet all the HMIS data standards, and work for HUD reporting purposes, but are not practical for the other day-to-day work of a VSP. Other databases may be more user-friendly for a VSP's workflow, but cannot record data or generate reports in compliance with HUD standards or the SAGE uploading requirements. In either of

these cases, a VSP has spent time and money to purchase a database that is virtually unusable for its intended purpose.

Slide 18 – Addressing Challenges

Don't be intimidated, though! There are ways to prevent or alleviate these challenges and increase access to HUD funding for VSP, and in turn, housing access for survivors.

First, while there are considerable costs associated with comparable databases, it is possible to anticipate and even minimize them.

- Before applying for Continuum of Care, or CoC, or Emergency Solutions Grant, or ESG, funding it's necessary to determine what the full cost of your comparable database will be, including the upfront and ongoing database costs, as well as the staff time that will be dedicated to the data collection and maintenance of the database. This can prevent you from encountering unexpected costs after you are awarded funding. Once the costs are identified, determine how much can be covered under the administrative portion of your grant, and how much of it can be listed as a line-item under the HMIS portion of your budget proposal. CoCs should be able to help you sort through the

eligible expenses under each budget category and provide guidance about how to best designate database costs in your project budget.

It’s also important to thoroughly vet comparable databases to avoid post-purchase issues. Each vendor will have a sales team that will share information about their product. Prepare for those sales meetings by developing your own targeted questions for the vendor that address your specific workflow issues, HMIS data standards compliance, and VAWA confidentiality compliance. HUD and national organizations like NNEDV are good resources for helping you prepare.

Once you have selected a vendor, be sure to include in the contract written information about the database's HMIS data standards compliance, data ownership, safety protocols, and protection against third party access including within the vendor itself. This will force the vendor to clearly articulate those features and hold them accountable if for any reason the contract terms are not met.

Finally, you don’t have to work through all these issues alone. Having outside assistance with the process of vetting databases, contracting with vendors, and troubleshooting technology issues can prevent problems from arising in the first

place and help reduce cost, staff time, and heartache if issues arise post-purchase.

- There are several resources such as toolkits, checklists and guides from HUD and technical assistance providers that can help. The resource pages connected to this session will provide links to these resources.
- Individual technical assistance is also available from several sources.
- For example, the HMIS Lead can be a very helpful resource for many of your technology-related questions. Both the CoCs and the HMIS lead are required by HUD as part of their duties to provide VSPs with assistance where possible. They cannot purchase a database for a VSPs and cannot view the database to provide technical help with individual issues, but there are other ways that they can assist. First, the HMIS could help the VSP understand some of the technical language that the vendor uses when talking about their product. Also, the HMIS could do screen sharing sessions in a test site that is identical to the VSP's database that does not include client information.

- Other VSPs who have HUD funding can also be helpful resources. They will have practical experience and can provide candid feedback, tips, and lessons learned.
- Finally, technical assistance is available from providers at the Coalitions and national organizations.

Slide 19 – Resources

The resource page connected to this session will include links to the HUD Comparable Database Manual, information from NNEDV, the Safe Housing Network and more.

Slide 20 – Gratitude

Special thanks to everyone who participated in the development of this sessions and thanks to all of you for joining us. We hope we have been able to provide a basic understanding of comparable databases. We are aware this is a complex topic, so please don't hesitate to reach out to VFMN or some of the resources we're offering should you want more information.

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