

Sharing of HMIS information among providers within a CoC allows local providers and clients to obtain maximum benefits from such systems. From an operational perspective, it improves the ability of service provider staff to coordinate and deliver services to homeless clients. From a policy and research perspective, sharing enables the CoC to obtain most efficiently and accurately an unduplicated count of homeless persons at the CoC level, analyze its needs and service patterns, and determine the extent to which mainstream programs are serving homeless persons.

Regardless of whether sharing among providers occurs or not, protected personal identifiers must be encrypted within the HMIS using the highest current standards. Unencrypted data should only be accessible through the local HMIS application at the site. Encryption standards are discussed in Part 4 of this notice.

Special Provisions for Domestic Violence Shelters

Domestic violence shelters and other programs targeting victims of domestic violence play an important role in many CoCs and have received significant funding through local Continuums. Domestic violence victims are also served in many general purpose emergency and transitional facilities funded by HUD. HUD is aware of, and is sensitive to, the data confidentiality and security concerns that many domestic violence shelters have with respect to their participation in a local HMIS. HUD is also aware of a range of provider practices and protocols for collecting intake and other information from clients who are victims of domestic violence.

As mentioned in Section 1.2, the ESG and SHP programs have specific domestic shelter/victims protections. These programs must still aggregate basic demographic and other information to submit to the ESG Integrated Disbursement and Information System (IDIS) and/or the SHP Annual Progress Report. The key to many domestic shelters' participation in existing HMIS hinges on the availability of sophisticated specific HMIS software that addresses data security issues and the protocols for data security, confidentiality, and sharing developed at the local level.

At a minimum, HUD will not expect a domestic violence shelter it funds to participate in a local HMIS where HMIS software or data protocols raise a significant risk to its clients. In addition, providers of homeless assistance services will not be required to report

personal identifying information for victims of domestic violence or for people in witness protection programs to a central storage facility given the unique concerns about personal safety for these populations. However, providers will be expected to provide unduplicated project-level data about participant characteristics without personal identifiers.

It should be emphasized that HMIS have the potential for providing valuable data concerning domestic violence victims' needs at the local and national levels. HUD invites continued dialogue with domestic violence shelters and advocates concerning appropriate national data and technology standards to protect domestic violence victims and encourage participation in local HMIS, thus extending HMIS benefits to victims of domestic violence.

1.5 Who Must Participate in Homeless Management Information Systems

Given the benefits of an HMIS for improving housing and service provision at the local level and providing accurate estimates of the homeless population and its needs, all recipients of HUD McKinney-Vento Act program funds are expected to participate in an HMIS. The HUD McKinney-Vento Act programs include Emergency Shelter Grants, Supportive Housing Program, Shelter Plus Care, and Section 8 Moderate Rehabilitation for Single Room Occupancy (SRO). In the FY 2003 funding notices for the Supportive Housing, Shelter Plus Care, and Section 8 SRO Moderate Rehabilitation programs, HUD announced that providing data to an HMIS is a condition of funding for grantees. It is expected that all recipients of Housing Opportunities for Persons with AIDS (HOPWA) funding whose projects intentionally target assistance, conduct outreach, and/or conduct other specialized efforts to serve HOPWA eligible persons who are homeless, should ensure that reporting on assistance to these persons is integrated within the area's HMIS efforts. HOPWA projects that serve homeless persons are expected to, and strongly encouraged to, participate in the area's HMIS.

The annual CoC application requires information about a CoC's progress in developing and implementing its HMIS. This information is used to rank CoCs in order to determine annual program funding. The application questions will be more detailed in the future to make possible an accurate determination of the extent of coverage and stage of implementation of each HMIS.

Recipients of funds under most HUD McKinney-Vento Act programs and HOPWA are required to submit Annual Progress Reports (APRs) to HUD. In the future, much of the information to be included in APRs will be derived from HMIS data. This will be possible since guidelines for reporting to the APR will reflect the data standards set forth in this notice and used in the HMIS. HUD will also be considering the value of automatic submission of aggregate APR data. For ESG and HOPWA grantees and recipients who are covered under the area's Consolidated Plan, performance reporting involves the annual submission of a Comprehensive Annual Performance Evaluation Report (CAPER) along with the use of the Department's Integrated Disbursement and Information System (IDIS). HMIS will also provide a valuable tool to communities to provide the basic data that will be used to inform the performance reports used for these formula programs.

HUD may at some point use an APR driven by HMIS data to measure the performance of both McKinney-Vento Act program grantees and CoC more generally. Should that occur, performance indicators would be developed through a process of consultation with providers of services to homeless persons. Performance indicators would need to be carefully designed to include appropriate adjustments for the characteristics of the population served by a CoC and individual providers and the nature of the services provided. CoC grantees and software developers would be given sufficient time to adopt enhancements to their systems to accommodate these new outcome indicators.

1.6 Staging of Local HMIS Implementation

HUD recognizes that developing and implementing an HMIS is a difficult and time-consuming process and must necessarily be done in stages. A CoC's first priority is to bring on board the emergency shelters and transitional housing programs that receive HUD McKinney-Vento Act funding. However, HUD also encourages CoCs to actively recruit providers that receive HUD funding through sources other than the McKinney-Vento Act. These providers should be included in the HMIS as early as possible.

Other federal agencies that fund McKinney-Vento Act programs have their own data collection and reporting requirements. Key federal agency representatives were invited and participated in consideration of proposed HMIS data elements for this