

**Chicago Alliance to End Homelessness' Comments on the
Homeless Management Information Systems Requirements Proposed Rule
February 2012**

The Chicago Alliance to End Homelessness thanks you for the opportunity to submit comments on HUD's proposed rule for HMIS requirements. The Chicago Alliance's mission is to create, support, coordinate, and sustain effective strategies to prevent and end homelessness in Chicago. As the applicant for the HUD homeless assistance funding, the Chicago Alliance is a key player in administering over \$50 million that Chicago receives annually to provide housing and services to homeless individuals and families. The Alliance is in the midst of a transition process to become the HMIS Lead Agency, and the following recommendations were developed in consultation with the Chicago Alliance's Service Providers, many of whom sit on the CoC Governing Body's HMIS subcommittee.

Carrying Out HMIS Activities (§580.25)

Chicago's community of domestic violence victim service providers are part of a national movement to advocate on behalf of victims of domestic violence throughout the country. On their behalf, the Alliance requests that the section that reads,

“...domestic violence victim service providers must not directly enter or provide data into an HMIS if they are legally prohibited from participating in HMIS...”

should be changed to be:

“...domestic violence victim service providers must not directly enter or provide data into an HMIS whether or not they are legally prohibited from participating in HMIS.”

This ensures continuity across CoC's in how they are protecting victims of domestic violence.

Service-Volume Coverage as Proposed in HMIS Technical Standards (§580.33), HMIS Security Standards (§580.35) and Data Quality Standards & Management (§580.37)

The Alliance agrees with HUD that there exists a need to gather data on projects without overnight accommodations. In Chicago, all HUD-SHP service-only grants are entering data into HMIS, and participating in quarterly data quality checks, however the bed coverage rates for projects without overnight accommodations that do not receive HUD-SHP grant funding is unknown. The Alliance would suggest that if HUD begins calculating the bed-coverage rate for projects without overnight accommodations, that there be a transition period of at least 5 years, during which it will not be an official part of the Annual Homeless Assessment Report (AHAR) submission. This will give CoC's time to focus first on increasing the bed-coverage rates for projects that have overnight accommodations. It would also allow sufficient time to implement software adaptations that would allow for appropriate data collection for projects without overnight accommodations.

In regards to the calculation that should be used to calculate bed coverage for projects without overnight accommodations, the Alliance understands HUD's reasoning behind proposing the following calculation:

$$\frac{\text{\# of persons served annually by projects without overnight accommodations that participate in HMIS}}{\text{\# of persons served annually by all projects in CoC without overnight accommodations}}$$

However, in Chicago, we currently have not developed or implemented a way to capture the denominator in the calculation above. This information for projects *with* overnight accommodations comes from the housing inventory

Chicago Alliance to End Homelessness' Comments on the Homeless Management Information Systems Requirements Proposed Rule

February 2012

count, and projects *without* overnight accommodations currently do not provide data as part of the housing inventory count. While we agree with the proposed calculation, we again ask that there be a transition period of 5 years during which we can develop a way to capture all the information required for this calculation.

Definitions (§580.3) – Comparable Database

The Alliance held a special meeting with domestic violence victim service providers to help shape our comments for the definition of a comparable database. We welcome HUD's attempt to help the CoC generate unduplicated, system-wide data by requiring domestic violence victim service providers to be entering data into a comparable database. However, any comparable database our domestic violence victim service providers would use contains de-identified information – demographic data without any personal protected information attached to it – due to security risks. Because generating an unduplicated count typically requires identifying information, this would not be possible even with domestic violence victim service providers providing aggregate-level data to the CoC's HMIS. We recommend HUD remove the "unduplicated" from this definition.

We would also recommend that HUD allow for a period of transition of at least 1 year for domestic violence victim service providers to create or update their comparable database to be in line with the standards proposed in this rule.

HMIS Technical Standards (§580.3) – Unduplication requirements

For the same reasons mentioned above, we recommend that HUD add a statement to the unduplication requirements in the HMIS Technical Standards that allows for domestic violence victim service providers' comparable database to contain de-identified information, and may therefore be unable to unduplicate client records.

Duties of the Continuum of Care (§580.7)

The Alliance appreciates HUD's proposed rule that outlines the duties of the Continuum of Care (CoC) as it relates to HMIS, especially the requirement that a governance charter be created. The Alliance would recommend that HUD's requirement about the governance charter not include HMIS project operational details, such as the participation fee charged by the HMIS Lead agency, as those items may change from time to time, requiring the CoC Governing Body to spend precious time adopting changes to the governance charter on a regular basis. The governance charter could include a statement about how programmatic changes are approved by the CoC instead of outlining such details in the governance charter itself.

Duties of the HMIS Lead (§580.9)

The Alliance is excited by the requirement that the HMIS Lead submit a security plan, data quality plan, and privacy policy to the CoC as this will formalize and require these processes to occur, strengthening our HMIS. However, the Alliance encourages HUD to lengthen the time for which these policies and plans must be submitted to the CoC from 6 months to 1 year. Chicago is often seen as a model for CoC operations due to our structures that allow for significant participation and feedback from all stakeholders in our community. After the policies and plans are developed, the Alliance expects that stakeholders would need time to submit feedback about the policies, and we would recommend that HUD allow time for several drafts of them to be approved throughout the community, and then finally approved by the CoC.

**Chicago Alliance to End Homelessness' Comments on the
Homeless Management Information Systems Requirements Proposed Rule**

February 2012

HMIS Security Standards (§580.35) - Workforce security

The Alliance and its providers felt that requiring CHO's to conduct criminal background checks on the HMIS Security Officers and administrative users places an undue burden on CoC's and agencies. Agencies often deal with frequent turnover of staff entering data into HMIS, and requiring background checks on all users would prove to be very expensive for agencies and the system. Furthermore, domestic violence providers largely felt that background checks do not provide extra protection to the system because often those who intend to use the data maliciously have not been charged in the past, and would appear not to have a background. Finally, providers in Chicago are encouraged by HUD and the local CoC to hire previous consumers of their services, some of whom may have a criminal background. The Alliance recommends that HUD remove this requirement of background checks for both HMIS Security Officers and administrative users.

However, if HUD does not remove the requirement for background checks, then we would advocate for ensuring that the cost for background checks be an eligible use of SHP funds, and that policies about background check results be set by each CoC individually.

Thank you for considering our comments. If you would like to discuss these recommendations further, please contact:

Nicole Bahena
Director of Program Development
Chicago Alliance to End Homelessness
651 W. Washington, Suite 504
Chicago, Illinois 60661
(312) 379-0301, ext. 28
nbahena@thechicagoalliance.org