MEMORANDUM

To: Alameda County CoC Projects and Stakeholders
From: EveryOne Home
Date: February 6, 2019
Re: FY 2018 Continuum of Care (CoC) Program Competition: Funding Awards and Local Implications - New Projects, Domestic Violence Bonus Project, and CoC Planning Grant Awards

We have very exciting news to share! After last week’s release of renewal funding awards for the FY 2018 Continuum of Care Program competition, the U.S. Department of Housing and Urban Development (HUD) released today its funding announcement of new projects, including Domestic Violence Bonus projects and CoC Planning Grants. The Alameda County Continuum of Care award met our most optimistic projections. All 5 new projects, including 2 in Tier 2 were awarded for a total of $3,025,331. We added 108 permanent supportive housing subsidies/units and 15 rapid rehousing slots, as well as gaining technical assistance and training funds to improve Coordinated Entry’s ability to serve domestic violence victims and survivors of human trafficking. Projecting funding announced today:

- City of Berkeley’s COACH Project Expansion (PSH) - $1,583,136
- City of Oakland’s The Grand TH/RRH Project - $584,000
- SAHA’s Peter Babcock House & Redwood Hill (PSH) - $61,626
- HCD’s Welcome Home Expansion (PSH) - $636,432
- Building Futures/Domestic Violence Law Center’s Alameda County Domestic Violence SSO CES Project - $160,137

In addition, the CoC received $1,029,893 for its Planning Grant. Please use this link to view HUD’s list of funded projects. Alameda County’s list starts on page 4. Our CoC list of funded projects comparing what was requested versus what was awarded along with last Friday’s analysis memo are below.

Alameda County’s final CoC award package totals $37,648,221, which represents a $3.3 million increase from our 2018 Annual Renewal Demand of $34,329,783. This amount continues to place Alameda County as the third largest HUD CoC grantee in California, following Los Angeles and San Francisco. The CoC Committee and NOFA Committee constructed a strategic package that took risks by placing new projects in Tier 1 and reallocating unspent funds. We believe this made the overall package more competitive and contributed to so many Tier 2 projects also getting funded. EveryOne Home would like to thank the members for their leadership and hard work throughout the process.

Congratulations to the all applicants, grantees, HUD CoC Committee, and NOFA Committee members for your continuous hard work in serving our populations impacted by homelessness and assisting to enhance our housing portfolio in order to effectively address the scale of our housing crisis. Please feel free to distribute this to any sub-grantees or colleagues who were also part of the CoC NOFA process.
<table>
<thead>
<tr>
<th>Rank</th>
<th>Project</th>
<th>Agency</th>
<th>Program Type</th>
<th>Application Amount</th>
<th>Award Amount</th>
<th>Percent Funded</th>
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<td><strong>$36,689,511</strong></td>
<td><strong>$37,648,221</strong></td>
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MEMORANDUM

To: Alameda County CoC Projects and Stakeholders
From: EveryOne Home
Date: February 1, 2019

Re: FY 2018 Continuum of Care (CoC) Program Competition: Funding Awards and Local Implications

On January 26, 2019 the U.S. Department of Housing and Urban Development (HUD) announced funding awards for the FY 2018 Continuum of Care Program Competition which includes all renewal projects and projects that applied for transition and/or consolidation grants. Awards for new projects, including projects being awarded with Domestic Violence Bonus (DV Bonus) funding, and CoC Planning Grants will be announced later. Our Continuum was awarded $33,592,887 for renewing projects, including all Tier 1 renewals and 2 renewals in Tier 2. This amount exceeds the CoC’s Tier 1 allocation by $1.3 million. Use this link to view HUD’s list of funded projects. Alameda County’s list starts on page 4.

Many renewing projects house thousands of people who used to be homeless and now live in permanent, affordable homes. Other projects assist hundreds of people to end their homelessness each year. The list below provides a comparison of what was requested by the Continuum versus what was awarded in the rank order, except for consolidate projects. Consolidated projects are listed where the lead project ranked when they submitted as individual projects.

Result highlights include:

- All but three renewals/transition grants funded. Most renewals were funded in this round including two projects in Tier 2:
  - Welcome Home, operated by Alameda County HCD for $843,587. It was combine with two other scattered site PSH projects described below.
  - North County Homeless Youth RRH funded at $983,781.

Three renewals at the bottom of Tier 2 were not funded:
  - Housing Stabilization (Building Opportunities for Self-Sufficiency) providing 14 family Rapid Rehousing (RRH) slots.
  - Russel Street Residence (Berkeley Food and Housing Project) providing 13 permanent housing (PH) beds for single adults living with serious mental illness.
  - Bridget House (Women’s Daytime Drop in Center) a 4-unit Transitional Housing project that sought to transition to TH-RRH.

The funding for these three projects totaled $847,217. The CoC will continue to work with local funders and are very hopeful we can maintain the capacity those projects provide for our Housing Crises Response System.

- The largest transitional housing (TH) project in the package received a TH-RRH Transition award. The Housing Fast Support Network, also known as the Henry Robinson enabled us to
reallocate over $1.8 million from TH to Joint TH-RRH. The package included $3.4 million in reallocations and may have helped to ensure funding for the two large renewals in Tier 2.

- **Adjustments to Fair Market Rent (FMR) lead to higher awards for some projects.** In accordance to HUD’s adjustments to FMR, awards increased for projects that include rental assistance. HUD uses the FMRs that were in effect at the time applications were due, rather than the annual renewal demand. Increases to the total grants range from 4-7% depending on how much of the project budget is rental assistance.

- **HUD approved all four proposals to consolidate projects.** Nine projects have been consolidated into four, which should simplify the administration of projects that have the same grantee, provide similar housing response, or in the same location. The new consolidated projects and award amounts are indicated on the list below.
  
  - The City of Berkeley consolidated Tenant Based Rental Assistance and Housing for Older Adults Project (HOAP) for a total award amount of $3,594,226.
  - The Alameda County Housing and Community Development Department (HCD) consolidated Spirit of Hope and Alameda Point Permanent for a total award of $388,651.
  - The Alameda County Housing and Community Development Department (HCD) consolidated Lorenzo Creek SHP and Alameda County Shelter Plus Care -Lorenzo Creek for a total award of $315,501.
  - The Alameda County Housing and Community Development Department (HCD) consolidated Welcome Home, Alameda County Shelter Plus Care – HOST, and Alameda County Shelter Plus Care HOPE housing for a total award of $2,707,400.

- **Our CoC is anticipates another $3,173,551 for new projects and the CoC Planning Grant.** The application package included three new projects totaling $2,143,658 in Tier 1 and a CoC Planning Grant for $1,029,893. The CoC believes these will be awarded along with the DV bonus project at $160,000 and new PSH project at $600,000 may also be awarded. The CoC predicts that our final package amount will be between $36.76 million and $37.52 million when final awards are announced. The final award will represent a significant increase from our 2018 Annual Renewal Demand of $34,329,783.

Congratulations to all grantees and to our community for its participation, commitment to excellence, and strategic approaches to our collaborative application each year. We are looking forward to continuing to advance our collective efforts to strengthen our Continuum’s outcomes, maintain and enhance our housing and homeless services’ portfolio, and further develop housing access and resources for those most vulnerable through our newly implemented Coordinated Entry system, new HMIS System implementation, and our Result Based Accountability processes and dashboard. 2019 will be a very busy and productive year!

Please feel free to distribute this to any sub-grantees or colleagues who were also part of the CoC NOFA process. If you have questions about your specific funding award amount, please direct them to Riley at riley.wilkerson@acgov.org. Other questions may be directed to EveryOne Home at info@everyonelome.org.

A community debrief of the NOFA process will be initiated in this first quarter. Please stay tuned for more from EveryOne Home.
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<td>Program Type</td>
<td>Award Amount</td>
</tr>
<tr>
<td>------</td>
<td>----------------------------------------------</td>
<td>--------------------</td>
<td>--------------</td>
<td>----------------</td>
</tr>
<tr>
<td>21</td>
<td>Pathways Project</td>
<td>City of Berkeley</td>
<td>PSH</td>
<td>$188,768.00</td>
</tr>
<tr>
<td>22</td>
<td>Welcome Home San Leandro</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$683,628.00</td>
</tr>
<tr>
<td>23</td>
<td>Lorenzo Creek SHP</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$77,369.00</td>
</tr>
<tr>
<td>24</td>
<td>Supportive Housing Network</td>
<td>City of Berkeley</td>
<td>PSH</td>
<td>$194,131.00</td>
</tr>
<tr>
<td>25</td>
<td>Tri-City FESCO Bridgeway Apartments</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$42,973.00</td>
</tr>
<tr>
<td>26</td>
<td>Alameda County Shelter Plus Care - SRO</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$627,108.00</td>
</tr>
<tr>
<td>27</td>
<td>The Grand</td>
<td>City of Oakland</td>
<td>NEW Joint TH and PH-RRH</td>
<td>$584,000.00</td>
</tr>
<tr>
<td>28</td>
<td>Housing Fast Support Network TH &amp; RRH</td>
<td>City of Oakland</td>
<td>NEW Joint TH and PH-RRH</td>
<td>$1,865,465.00</td>
</tr>
<tr>
<td>29</td>
<td>Alameda County Shelter Plus Care - TRA</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$6,746,471.00</td>
</tr>
<tr>
<td>30</td>
<td>Alameda County Shelter Plus Care - SRA</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$1,313,084.00</td>
</tr>
<tr>
<td>31</td>
<td>Channing Way Apartments</td>
<td>Bonita House, Inc.</td>
<td>PSH</td>
<td>$39,767.00</td>
</tr>
<tr>
<td>32</td>
<td>Alameda County Shelter Plus Care - PRA</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$471,604.00</td>
</tr>
<tr>
<td>33</td>
<td>Southern Alameda County Housing/Jobs Linkages Program</td>
<td>Alameda County HCD</td>
<td>RRH</td>
<td>$1,499,466.00</td>
</tr>
<tr>
<td>34</td>
<td>Turning Point</td>
<td>Fred Finch Youth Center</td>
<td>TH-TAY</td>
<td>$422,579.00</td>
</tr>
<tr>
<td>35</td>
<td>Laguna Commons Rental Assistance Program (RAP)</td>
<td>Alameda County BHCS</td>
<td>PSH</td>
<td>$173,080.00</td>
</tr>
<tr>
<td>36</td>
<td>Peter Babcock House</td>
<td>Satellite Affordable Housing Associates</td>
<td>PSH</td>
<td>$28,321.00</td>
</tr>
<tr>
<td>37</td>
<td>Homes for Wellness</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$917,900.00</td>
</tr>
<tr>
<td>38</td>
<td>APC Multi-Service Center</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$1,111,092.00</td>
</tr>
<tr>
<td>39</td>
<td>Alameda County Shelter Plus Care - HOST</td>
<td>Alameda County HCD</td>
<td>PSH</td>
<td>$1,309,124.00</td>
</tr>
<tr>
<td>40</td>
<td>North County Family Rapid Rehousing Collaborative</td>
<td>City of Oakland</td>
<td>RRH</td>
<td>$822,119.00</td>
</tr>
<tr>
<td>41</td>
<td>Oakland Homeless Youth Housing Collaborative</td>
<td>City of Oakland</td>
<td>TAY-TH</td>
<td>$713,095.00</td>
</tr>
<tr>
<td>42</td>
<td>Health, Housing and Integrated Services Network</td>
<td>LifeLong Medical Care</td>
<td>PSH</td>
<td>$549,672.00</td>
</tr>
<tr>
<td>43</td>
<td>Banyan House Transitional Housing</td>
<td>Alameda County HCD</td>
<td>Gen-TH</td>
<td>$81,320.00</td>
</tr>
<tr>
<td>Rank</td>
<td>Project</td>
<td>Agency</td>
<td>Program Type</td>
<td>Award Amount</td>
</tr>
<tr>
<td>------</td>
<td>----------------------------------------------</td>
<td>-------------------------</td>
<td>--------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>44</td>
<td>Alameda County CES</td>
<td>Alameda County HCD</td>
<td>CES</td>
<td>$1,038,171.00</td>
</tr>
</tbody>
</table>

**Tier 1 Subtotal** $32,269,996

<table>
<thead>
<tr>
<th>Rank</th>
<th>Project</th>
<th>Agency</th>
<th>Program Type</th>
<th>Award Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>45</td>
<td>Welcome Home</td>
<td>Alameda County HCD</td>
<td>RRH</td>
<td>$843,587.00</td>
</tr>
<tr>
<td>46</td>
<td>North County Homeless Youth RRH</td>
<td>City of Oakland</td>
<td>PSH</td>
<td>$939,681.00</td>
</tr>
<tr>
<td>47</td>
<td>Alameda County DV-SSO CES</td>
<td>Building Futures for Women and Children</td>
<td>NEW SSO-CES</td>
<td>$160,137.00</td>
</tr>
<tr>
<td>48</td>
<td>Alameda County Shelter Plus Care - Welcome Home Expansion</td>
<td>Alameda County HCD</td>
<td>NEW PSH</td>
<td>$600,000.00</td>
</tr>
<tr>
<td>49</td>
<td>Russell Street Residence</td>
<td>Berkeley Food and Housing Project</td>
<td>RRH</td>
<td>$372,040.00</td>
</tr>
<tr>
<td>50</td>
<td>Housing Stabilization</td>
<td>Building Opportunities for Self-Sufficiency</td>
<td>Joint TH and PH-RRH</td>
<td>$404,888.00</td>
</tr>
<tr>
<td>51</td>
<td>Bridget House TH/PH-RRH</td>
<td>Women's Daytime Drop-In Center</td>
<td>NEW Joint TH and PH-RRH</td>
<td>$70,289.00</td>
</tr>
</tbody>
</table>

**Tier 2 Subtotal** $3,390,622

**Total Ask for Projects w/o CoC Planning** $35,660,618

<table>
<thead>
<tr>
<th>Tiers and Package Options</th>
<th>Actuals</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Renewal Demand (ARD)</td>
<td>$34,329,783</td>
<td>$0.00</td>
</tr>
<tr>
<td>Tier 1</td>
<td>$32,269,996</td>
<td>$0.00</td>
</tr>
<tr>
<td>ARD in Tier 2</td>
<td>$2,059,787</td>
<td>$0.00</td>
</tr>
<tr>
<td>Possible Bonus</td>
<td>$2,059,787</td>
<td>$1,358,933.00</td>
</tr>
<tr>
<td>Total Tier 2 Amount</td>
<td>$4,119,574</td>
<td>$3,230,485.00</td>
</tr>
<tr>
<td>DV Bonus</td>
<td>$1,062,887</td>
<td>$160,137.00</td>
</tr>
<tr>
<td>Planning Grant</td>
<td>$1,029,893</td>
<td>$1,029,893.00</td>
</tr>
<tr>
<td>Total possible package</td>
<td>$37,452,457</td>
<td>$36,690,511</td>
</tr>
</tbody>
</table>

**Projects Not Renewing**

<table>
<thead>
<tr>
<th>Project</th>
<th>Agency</th>
<th>Amount</th>
<th>Type and Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>North County Women's Center</td>
<td>Berkeley Food and Housing Project</td>
<td>$390,535.00</td>
<td>Program ended</td>
</tr>
</tbody>
</table>
Before Starting the CoC Application

The CoC Consolidated Application consists of three parts, the CoC Application, the CoC Priority Listing, and all the CoC's project applications that were either approved and ranked, or rejected. All three must be submitted for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for reviewing the following:

1. The FY 2018 CoC Program Competition Notice of Funding Available (NOFA) for specific application and program requirements.
2. The FY 2018 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.
6. Questions marked with an asterisk (*), which are mandatory and require a response.
1A. Continuum of Care (CoC) Identification

Instructions:
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number: CA-502 - Oakland, Berkeley/Alameda County CoC

1A-2. Collaborative Applicant Name: Alameda County

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Alameda County
1B. Continuum of Care (CoC) Engagement

Instructions:
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. CoC Meeting Participants. For the period from May 1, 2017 to April 30, 2018, using the list below, applicant must: (1) select organizations and persons that participate in CoC meetings; and (2) indicate whether the organizations and persons vote, including selecting CoC Board members.

<table>
<thead>
<tr>
<th>Organization/Person Categories</th>
<th>Participates in CoC Meetings</th>
<th>Votes, including selecting CoC Board Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Government Staff/Officials</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>CDBG/HOME/ESG Entitlement Jurisdiction</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Local Jail(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Hospital(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>EMS/Crisis Response Team(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Mental Health Service Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Substance Abuse Service Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Affordable Housing Developer(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Disability Service Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Disability Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Public Housing Authorities</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>CoC Funded Youth Homeless Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Non-CoC Funded Youth Homeless Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Youth Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>School Administrators/Homeless Liaisons</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>CoC Funded Victim Service Providers</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Non-CoC Funded Victim Service Providers</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Domestic Violence Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Street Outreach Team(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>LGBT Service Organizations</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Agencies that serve survivors of human trafficking</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Other homeless subpopulation advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Homeless or Formerly Homeless Persons</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Mental Illness Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Substance Abuse Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
1B-1a. Applicants must describe the specific strategy the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness.  

(limit 2,000 characters)

The CoC solicits input from a broad array of stakeholders through meetings, focus groups, committees, online surveys, and participation in other planning bodies. CoC membership is open to anyone. Invitations and agendas are issued to a 2000 name list of consumers, providers, jurisdictional staff, and elected officials. In June of 2017, the CoC Lead EveryOne Home began a twelve-month, collaborative community process to develop “Homelessness in Alameda County: 2018 Strategic Plan Update”, with a focus on eliminating unsheltered homelessness by reducing homelessness overall. The draft Plan was informed by over a dozen of key stakeholder interviews, six county-wide consumer focus groups, members of Leadership Board, CoC Board, Results Based Accountability and System Coordination committees, four community forums with the CoC membership (attended by over 100 people), and a review of best practices and plans from communities with similar homeless populations and housing markets. It was posted to the EveryOne Home website for public comment between July 2nd through August 10th of 2018. Community members provided written comment using an electronic form available on the website or by email. Two additional open meetings were held. In all, the CoC received written comments from 15 sources including jurisdictions, nonprofit organizations, community members, and formerly homeless consumers. Feedback broadened and strengthened the Plan’s recommendations. Examples include: 1) People currently experiencing homelessness prioritized health and sanitary services for the unsheltered and leadership recruitment and training programs for people with lived experiences. Both are in the Plan; 2) Survivors and advocates informed the discussion of improving Coordinated Entry’s response to those fleeing domestic violence and human trafficking; 3) Per the request of local elected officials, the Plan includes examples of local public policies that if passed could support ending homelessness.

1B-2. Open Invitation for New Members. Applicants must describe:
(1) the invitation process;
(2) how the CoC communicates the invitation process to solicit new members;
(3) how often the CoC solicits new members; and
(4) any special outreach the CoC conducted to ensure persons experiencing homelessness or formerly homeless persons are encouraged to join the CoC.  

(limit 2,000 characters)

CoC membership is open to any individual interested in and committed to EveryOne Home, the collective impact initiative to end homelessness. Members
can join anytime by completing a brief application on-line or by attending a meeting and providing contact information and relationship to the CoC’s work. Members attend the annual meeting to elect representatives to the Leadership Board and CoC Board. The CoC lead works with partners to assure the inclusion of all stakeholders, including homeless/formerly homeless individuals. Two formerly homeless persons serve on the CoC Board, two on the Leadership Board, two on the project rating and ranking panel, and two on Appeals. The CoC did special outreach this winter to solicit the opinions and expertise of people currently experiencing homelessness and held six county-wide consumer focus groups in the early development of the Strategic Plan. Sixty-seven individuals, primarily unsheltered, single adults served through meal programs and warming shelters, participated in the focus groups held in Berkeley, Oakland, Fremont and Livermore. Consumers reported that the dignity and value of people with lived experience must be honored and respected and prioritized access to health and safety protections, rental subsidies, and opportunities to increase income and skills through leadership, employment training, and jobs. Given these recommendations, the Plan Update calls for Dignity and to deepen collaborations with people experiencing homelessness by intentionally seeking out their expertise and leadership, respect their dignity, increase their safety, and meet their needs. In addition, the CoC Board approved in April of 2018 the creation of the Youth Action Board (YAB) as a working group of the Board. The YAB is composed of formerly and currently homeless youth age 18 to 24 who are charged with the development of a plan to prevent and end youth homelessness in collaboration with the CoC Board and a county-wide collaborative.

1B-3. Public Notification for Proposals from Organizations Not Previously Funded. Applicants must describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding, even if the CoC is not applying for new projects in FY 2018, and the response must include the date(s) the CoC publicly announced it was open to proposals. (limit 2,000 characters)

The CoC has created new projects through reallocation or bonus funds since 2013. The CoC announces the funding opportunity electronically to its own and HCDs listservs (2000+ names); publishes the application, instructions and FAQs on its website; and holds input meetings and a bidders’ conference open to all interested applicants. The 2018 RFP New Projects Local Application explicitly states that eligible applicants include “Non-CoC funded existing Projects seeking to expand existing operations for eligible project types” or to provide “DV Bonus projects under eligible new DV Bonus project types” to better serve the needs of DV survivors. At the Bidders’ Conference held on 7/20/2018, CoC staff educated CoC and non-CoC funded projects on HUD criteria and creation of new projects and trained all attended on the New Projects Local Application’s requirements and rating factors for new project types. New and renewal applications are scored against each other using the same objective performance criteria. New applicants must demonstrate experience with similar projects and capacity to administer federal grants. All projects must earn a threshold score of 60 to be included. Applicants who have not previously received CoC or other federal funding are encouraged to consider partnering with existing grantees to strengthen their proposal. This submission includes 1 new sub-grantee for the Alameda County DV SSO
Coordinated Entry Project, the CoC’s Domestic Violence Bonus proposed project.
1C. Continuum of Care (CoC) Coordination

Instructions:
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. CoCs Coordination, Planning, and Operation of Projects. Applicants must use the chart below to identify the federal, state, local, private, and other organizations that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness that are included in the CoCs coordination, planning, and operation of projects.

<table>
<thead>
<tr>
<th>Entities or Organizations the CoC coordinates planning and operation of projects</th>
<th>Coordinates with Planning and Operation of Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Opportunities for Persons with AIDS (HOPWA)</td>
<td>Yes</td>
</tr>
<tr>
<td>Temporary Assistance for Needy Families (TANF)</td>
<td>Yes</td>
</tr>
<tr>
<td>Runaway and Homeless Youth (RHY)</td>
<td>Yes</td>
</tr>
<tr>
<td>Head Start Program</td>
<td>Yes</td>
</tr>
<tr>
<td>Funding Collaboratives</td>
<td>Yes</td>
</tr>
<tr>
<td>Private Foundations</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and services programs funded through U.S. Department of Justice (DOJ) Funded Housing and Service Programs</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and services programs funded through U.S. Health and Human Services (HHS) Funded Housing and Service Programs</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and service programs funded through other Federal resources</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and services programs funded through State Government</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and services programs funded through Local Government</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and service programs funded through private entities, including foundations</td>
<td>Yes</td>
</tr>
<tr>
<td>Other:(limit 50 characters)</td>
<td></td>
</tr>
<tr>
<td>Public Housing Authorities</td>
<td>Yes</td>
</tr>
</tbody>
</table>

1C-2. CoC Consultation with ESG Program Recipients. Applicants must describe how the CoC:
(1) consulted with ESG Program recipients in planning and allocating ESG funds; and
(2) participated in the evaluating and reporting performance of ESG Program recipients and subrecipients.
(limit 2,000 characters)

ESG recipients serve on the CoC Board, which meets monthly, and establishes funding priorities for use of ESG and CoC funds. All Con Plan jurisdictions and ESG recipients participate actively on Committees including the CoC Board, System Coordination, Results Based Accountability, and the Funders
Collaborative. Recipients utilize HMIS performance data to evaluate ESG funded activities and the scoring of sub-recipient applications. The CoC provides HIC, PIT and performance data to all ten Con Plan jurisdictions, Alameda, Berkeley, Hayward, Fremont, Livermore, Oakland, Pleasanton, San Leandro, Union City and the Urban County. In 2017 a new PIT Count methodology provided each jurisdiction unsheltered and sheltered PIT counts. Previously, jurisdiction level counts were extrapolated using the county-wide PIT and city level HMIS data. ESG recipients align funding with the CoC’s plan and Coordinated Entry by supporting shelter and rapid rehousing slots for chronically homeless and high need individuals and families. The CoC and ESG jurisdictions are in the process of evaluating how to best spend RRH funds in the CE system to assess which populations benefit from rapid rehousing to permanently end homelessness. CoC staff drafts and/or reviews Consolidated Plan updates and annual reports, ensuring use of data and alignment with CoC priorities. The CoC and ESG recipients will convene in early Spring 2019 in preparation for the 2020-2025 Alameda County Consolidated Plan and to review annual plans and CAPERS reports. In 2018, the CoC’s System Coordination Director participated as reviewer for the 2018 County’s ESG RFP funds.

| 1C-2a. Providing PIT and HIC Data to Consolidated Plan Jurisdictions. Did the CoC provide Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area? | Yes to both |
| 1C-2b. Providing Other Data to Consolidated Plan Jurisdictions. Did the CoC provide local homelessness information other than PIT and HIC data to the jurisdiction(s) Consolidated Plan(s)? | Yes |

1C-3. Addressing the Safety Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors. Applicants must describe:

1. the CoC’s protocols, including the existence of the CoC’s emergency transfer plan, that prioritizes safety and trauma-informed, victim-centered services to prioritize safety; and
2. how the CoC maximizes client choice for housing and services while ensuring safety and confidentiality.

The CoC has voluntary transfer policies that are written to protect the safety of clients and prevent homelessness due to safety concerns. The CoC is also committed to client safety, confidentiality and trauma informed practices by offering secure and standard procedures that provide flexibility to choose services and housing that meet participant needs. Emergency shelters, DV services, and Veterans services are low-threshold and access information is available 24/7 without the need for CE screening. If a client accesses the system through CE, intake begins with an anonymous Safety Screening with
built-in protocol to connect households to victim services agencies through regional hotlines. DV survivors are informed of the options to seek services through the DV system, CE or both. Next, through a Housing Crisis Screening, households may choose how to access the system: identifying the place in the region where they consider home and choosing the Housing Resource Center (HRC) or Outreach Teams where they would like to be served. Veterans can choose to be served at an HRC or at Veteran specific services. In accordance with HMIS standards, DV service providers use a comparable database and are not required to use HMIS. All HMIS and other applicable privacy and security policies are extended to any data collection methods outside of the HMIS as well as case conferencing. For clients who are assessed using the CE Assessment tool, all assessors are trained and certified by EveryOne Home on standard assessment practices, using trauma informed interviewing methods, and the fundamental principles of low-threshold, housing first, and harm-reduction. The HCRS includes a range of services and housing programs targeting the diverse populations of the County including shelters, navigation services, TH, PSH, and RRH programs that target trauma and DV survivors.

1C-3a. Applicants must describe how the CoC coordinates with victim services providers to provide annual training to CoC area projects and Coordinated Entry staff that addresses best practices in serving survivors of domestic violence, dating violence, sexual assault, and stalking. (limit 2,000 characters)

It is standard practice that CoC providers, as well as, the 211 Call Center offer regular training to their staff on how to offer trauma informed and culturally competent services, harm-reduction approaches and motivational interviewing, safety planning, and providing low-threshold, non-judgmental support. In addition, local DV providers offer state-mandated 48-hour DV counselor certification trainings, and make those trainings available to CoC providers, several times per year. Training for any staff who have client contact as an access point to the system or who are responsible for collecting client level data are given specific training on screening, referral, and confidentiality practices for victims of domestic violence, sexual assault, or human trafficking. This year’s CoC application includes a DV bonus project that intends to partner with DV providers to increase DV specific training for Coordinated Entry staff and to further refine or improve implementation of the screening and referral processes for households who have experienced severe trauma and/or victims of domestic violence and assault.

1C-3b. Applicants must describe the data the CoC uses to assess the scope of community needs related to domestic violence, dating violence, sexual assault, and stalking, including data from a comparable database. (limit 2,000 characters)

The CoC uses a number of sources of data to assess community need. Those include data from the National Network to End Domestic Violence (NNEDV), the National Domestic Violence Hotline, the California Department of Justice and our own HMIS. Alameda County has seven providers that serve survivors of domestic violence, dating violence, sexual assault and stalking, all operate 24-hour hotlines, five provide emergency shelter and are required to have comparable data bases. Each provider has the capacity to aggregate the
deidentified data within their own programs but are unable to deduplicate and aggregate across provider agencies, making local data bases unreliable for assessing the scope of community need. According to the NNEDV 2017 Domestic Violence Count annual report, there were 20,352 domestic violence hotline calls across the United States in one day. Of those calls, 65% of those requests were for housing. According to the California Department of Justice, there were a total of 6,230 domestic violence related “911” calls in Alameda County in 2017. If we assume each call was from a unique individual and 65% (4,050 victims) had the need for housing, the CoC could estimate the upper bound of domestic violence survivors who need assistance with housing. That number is nearly nine times the number of survivors served in 2017 by the Homeless Services System who reported fleeing domestic violence when they entered programs.

1C-4. DV Bonus Projects. Is your CoC applying for DV Bonus Projects? Yes

1C-4a. From the list, applicants must indicate the type(s) of DV Bonus project(s) that project applicants are applying for which the CoC is including in its Priority Listing.

| SSO Coordinated Entry | X |
| RRH                  |   |
| Joint TH/RRH         |   |

1C-4b. Applicants must describe:
(1) how many domestic violence survivors the CoC is currently serving in the CoC’s geographic area;
(2) the data source the CoC used for the calculations; and
(3) how the CoC collected the data.
(limit 2,000 characters)

The 2017 Point in Time Count identified 1,026 individuals, 18% of the homeless population, who had experienced domestic violence or sexual assault at some point in their lifetime. 2017 HMIS data indicates that of the 10,329 adults served in PSH and homeless programs 24% (2,499 adults) had experienced domestic violence, 444 (18%) of those adults were fleeing domestic violence at the time of program entry. Numbers for the entire system are based on self-reports. Alameda County’s housing inventory dedicates a total of 32 permanent supportive housing beds and 180 temporary shelter beds to domestic violence survivors. Survivors that utilize these projects provide the on-site staff with more information about the nature or their experiences to assist in risk assessment and safety planning. At the 2018 Point in Time Count of sheltered homelessness, these beds had a 90% occupancy rate. In addition, four domestic violence shelter operators are part of the Housing/Jobs Linkages Collaborative which provided RRH to 58 survivor households in FY 2017.

1C-4c. Applicants must describe:
(1) how many domestic violence survivors need housing or services in the CoC’s geographic area;  
(2) data source the CoC used for the calculations; and  
(3) how the CoC collected the data.  
(limit 2,000 characters)

Alameda County’s CoC looks to nation and state-wide data for the context on the number of DV survivors needing housing or services in Alameda County as the National Network to End Domestic Violence (NNEDV) which leads the Domestic Violence annual count, does not provide regional or county level data out of concern for the safety and confidentiality of survivors. According to the NNEDV 2017 Domestic Violence Count annual report, there were 20,352 domestic violence hotline calls across the United States in one day. Of those calls, 11,441 requests for DV services were unmet and 65% of those requests were for housing. The same year, the National Domestic Violence Hotline received 5,438 requests for DV shelter from California. A large amount of the hotline’s contacts where from Oakland, which was ranked 6th out of the top 10 California cities with the highest volume of contacts. This is not surprising given the data on domestic violence related calls in Alameda County. According to the California Department of Justice, there were a total of 6,230 domestic violence related “911” calls in Alameda County in 2017. It is unknow if the calls represent unique persons. Assuming calls were from different people, and 65% had the need for housing, as many as 4,050 domestic violence survivors who called 911 also need housing assistance, which could range from prevention/relocation, to shelter, RRH and PSH. The CoC is looking forward to strategizing along DV survivors and organizations on how to enhance data collection to appropriately assess local need while protecting survivors’ confidentiality and safety concerns. The proposed DV Bonus Project seeks to address the need for better data through collaboration between the CoC, DV systems and DV survivors.

1C-4d. Based on questions 1C-4b. and 1C-4c., applicant must:  
(1) describe the unmet need for housing and services for DV survivors, or if the CoC is applying for an SSO-CE project, describe how the current Coordinated Entry is inadequate to address the needs of DV survivors;  
(2) quantify the unmet need for housing and services for DV survivors;  
(3) describe the data source the CoC used to quantify the unmet need for housing and services for DV survivors; and  
(4) describe how the CoC determined the unmet need for housing and services for DV survivors.  
(limit 3,000 characters)

The Alameda County (ALCO) DV SSO Coordinated Entry Project aims to assist the EveryOne Home’s System Coordination Committee to more fully integrate victim service providers to ensure that survivors have access to the Coordinated Entry process, are safely and confidentially assessed, and can make informed decisions about accessing resources. Survivors and victim service providers have struggled to adjust to the implementation of Coordinated Entry (CE), launched by the CoC in October of 2017. Many victim service providers are hesitant to coordinate with the CoC, as they often have funding requirements, goals, policies and practices that do not align with HUD requirements. Consequently, there has been a gap in understanding, communications, and referrals/linkages between CE and victim service providers. As a result, survivors have difficulties navigating the CE process. The System Coordination
Committee, a system-wide stakeholder planning body with representation from the CoC Board, users and operators of the CE system, county and city departments, and non-profit service providers, has identified improving access to CE for DV survivors as a priority area of improvement. As described under 1C-4c above, there is a need to improve local data collection to appropriately assess DV survivors’ housing and service needs, including designing a uniform and comparable data base to better quantify access and outcomes for DV survivors, and closer collaboration in referrals and data sharing between the CoC and DV systems. The ALCO DV SSO CE project design includes reviewing and making proposals to enhanced data collection and confidentiality and better integrating the two systems to increase access to housing and services for all survivors.

1C-4e. Applicants must describe how the DV Bonus project(s) being applied for will address the unmet needs of domestic violence survivors. (limit 2,000 characters)

The Alameda County DV SSO Coordinated Entry project aims to address the identified gaps in the Coordinated Entry system (described under 1C-4d) to address the needs of DV survivors with the following proposed activities: 1) Seek feedback from survivors and victim service providers to identify gaps in CE and develop policy recommendations; 2) Review CE policies and propose appropriate changes and training requirements for the CoC to ensure that survivors have access to the CE process, are safely and confidentially assessed, and are able to make informed decisions about accessing resources through CE and/or victim services. These policies may include CE access points, screening and assessment; emergency transfer planning protocols; data collection and confidentiality; and training requirements; and 3) Develop and conduct a specialized training module on trauma informed care, cultural competency, domestic violence, sexual assault and other forms of trauma for CoC’s housing crisis response staff and other CoC service providers. 4) Improve data collection and analysis to more fully assess housing and service needs.

1C-4f. Applicants must address the capacity of each project applicant applying for DV bonus projects to implement a DV Bonus project by describing:
(1) rate of housing placement of DV survivors;
(2) rate of housing retention of DV survivors;
(3) improvements in safety of DV survivors; and
(4) how the project applicant addresses multiple barriers faced by DV survivors.
(limit 4,000 characters)

The Alameda County DV SSO Coordinated Entry Project is a joint project of Building Futures and Family Violence Law Center (FVLC). They are highly regarded, integral partners in both the homeless and victim services systems, uniquely qualified to improve inter-system collaboration and performance on behalf of survivors. For 30 years, Building Futures, a domestic violence and homeless organization, has met the safety and housing needs of survivors with trauma informed and harm reduction services across its programs. It manages Bessie Coleman Court, a CoC-funded, housing first, permanent supportive
housing program serving survivors of DV with a 100% housing retention rate. It enjoys an 81% housing placement rate in its RRH programs and serves as a sub-contractor in two of the CoC’s CE hubs. The FVLČ helps diverse communities in Alameda County heal from domestic violence and sexual abuse and provides survivor-centered legal services, advocacy, and emergency housing and relocation to DV and sexual abuse survivors. Both projects conduct regular domestic violence counselor certification trainings for volunteers and staff of partner agencies as well as their own. They are well positioned to enhance the system’s ability to assist survivors with obtaining and retaining permanent housing through reviewing CE policies and practices, identifying gaps and areas of improvement, researching best practices, and drafting recommendations to ensure survivors have access to safe housing opportunities and are provided trauma informed support to retain housing. The project will aim to reduce the length of homelessness for trauma survivors by establishing and enhancing protocols that ensure survivors have seamless access to the CE, victim services, and the housing services and programs connected to each system. For all systems survivors will be assessed, appropriately prioritized and quickly matched with services to help them attain or maintain housing stability and safety.

1C-5. PHAs within CoC. Applicants must use the chart to provide information about each Public Housing Agency (PHA) in the CoC’s geographic areas:

1. Identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA who were experiencing homelessness at the time of admission;
2. Indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV Program; and
3. Indicate whether the CoC has a move on strategy. The information should be for Federal Fiscal Year 2017.

<table>
<thead>
<tr>
<th>Public Housing Agency Name</th>
<th>% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2017 who were experiencing homelessness at entry</th>
<th>PHA has General or Limited Homeless Preference</th>
<th>PHA has a Preference for current PSH program participants no longer needing intensive supportive services, e.g. move on?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Livermore Housing Authority</td>
<td>0.00%</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Oakland Housing Authority</td>
<td>12.00%</td>
<td>Yes-Public Housing</td>
<td>Yes</td>
</tr>
<tr>
<td>Berkeley Housing Authority</td>
<td>0.07%</td>
<td>Yes-Public Housing</td>
<td>Yes</td>
</tr>
<tr>
<td>City of Alameda Housing Authority</td>
<td>14.00%</td>
<td>Yes-HCV</td>
<td>No</td>
</tr>
<tr>
<td>Alameda County Housing Authority</td>
<td>14.50%</td>
<td>Yes-HCV</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

1C-5a. For each PHA where there is not a homeless admission preference in their written policy, applicants must identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 2,000 characters)
Livermore Housing Authority (LHA) has exceeded its reputation of low turnover of vouchers, by experiencing 0 turnover of vouchers in the most recent grant year. Progress has also been made towards the adoption of a homeless preference. Project Based Vouchers (PBV) will incorporate a homeless preference for the new Stoney Creek property. The Admin Plan is in the process of being updated, with a final review by the Board planned for Dec 2018/Jan 2019. The LHA is also in the beginning stages of a newly proposed PBV project where tenants would be eligible for a voucher after completing 12 months in a participating program.

1C-5b. Move On Strategy with Affordable Housing Providers. Does the CoC have a Move On strategy with affordable housing providers in its jurisdiction (e.g., multifamily assisted housing owners, PHAs, Low Income Tax Credit (LIHTC) developments, or local low-income housing programs)?

Yes

Move On strategy description.
(limit 2,000 characters)

The CoC has “Move On” programs in three of the five PHAs within its geography. Since 2010, Alameda County S+C has a program with Oakland Housing Authority (OHA) that provides CoC PSH tenants in Oakland an opportunity to transfer/graduate from S+C and obtain an OHA HCV according to OHA’s vouchers capacity. To be eligible for the program the head of household must be residing in Oakland utilizing an OHA administered S+C voucher. In 2016, 38 people graduated from S+C to HCV through this “Move On” program and maintained tenancy for a least a year. This calendar year, 27 tenants are in process for transferring their vouchers to HCV. Berkeley Housing Authority (BHA) operates the Project Move Up program which issues ten 2-year vouchers annually to Mod Rehab (SRO) or S+C clients in Berkeley who have demonstrated desire and readiness to move up from respective programs and properties. Housing Authority of the County of Alameda (HACA) partners with Alameda County Behavioral Healthcare Services (BHCS) to provide HCVs to 75 of graduates of three BHCS supportive housing programs. Clients have the option of a Mental Health Services Act (MHSA) Project-Based subsidies program, a MSHA HCV program, and a CoC grant program. Unfortunately, neither BHA or HACA were able to issue vouchers in 2018 due to the programs being in shortfall situations regarding funding.

1C-6. Addressing the Needs of Lesbian, Gay, Bisexual, Transgender (LGBT). Applicants must describe the actions the CoC has taken to address the needs of Lesbian, Gay, Bisexual, and Transgender individuals and their families experiencing homelessness.
(limit 2,000 characters)

The CoC has focused on addressing the needs of Lesbian, Gay, Bisexual and Transgender individuals and families experiencing homelessness through a variety of strategies: 1) Data collection: the CoC has added sexual orientation as a data element during the 2018 HMIS conversion into Clarity in order to
better understand the needs, gaps and outcomes for lesbian, gay and bisexual individuals and families; 2) Governance: the CoC Board recruited and appointed a new CoC Board member from the Domestic Violence Law Center in Oakland, which provides legal services and advocacy to DV and sexual abuse survivors and violence prevention for LGBTQ+ youth and leads a project that focus on the impact of homelessness on women and individuals that identify as LGBTQ+, adding to the CoC expertise on behalf of LGBTQ+ communities, women, youth and DV survivors. In addition, the CoC has been targeting the recruitment of LGBTQ+ youth through the Youth Action Board’s outreach sessions at youth organizations that target queer youth; 3) Technical Assistance: CoC’s staff has provided technical assistance to CoC funded projects on the application of the CoC-wide LGBT Housing Access Anti-Discrimination Policy that was approved on 8/31/2017; and 4) Training: CoC has scheduled a CoC wide training on the Equal Access Rule for the month of October 2018.


1. Did the CoC implement a CoC-wide anti-discrimination policy that applies to all projects regardless of funding source? Yes
2. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)? No
3. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access to Housing in HUD Programs in Accordance with an Individual’s Gender Identity (Gender Identity Final Rule)? No

1C-7. Criminalization of Homelessness. Applicants must select the specific strategies the CoC implemented to prevent the criminalization of homelessness in the CoC’s geographic area. Select all that apply.

- Engaged/educated local policymakers: X
- Engaged/educated law enforcement: X
- Engaged/educated local business leaders: X
- Implemented communitywide plans: X
- No strategies have been implemented: 
- Other:(limit 50 characters)
  - PSH subsidies for CH identified by law enforcement: X
  - Proposal for repeal/stop of criminalization laws: X
  - Proposal for uniform County encampment policy: X
1C-8. Centralized or Coordinated Assessment System. Applicants must:
(1) demonstrate the coordinated entry system covers the entire CoC geographic area;
(2) demonstrate the coordinated entry system reaches people who are least likely to apply homelessness assistance in the absence of special outreach;
(3) demonstrate the assessment process prioritizes people most in need of assistance and ensures they receive assistance in a timely manner; and
(4) attach CoC’s standard assessment tool.

Coordinated Entry covers the entire CoC area. People who are homeless/at risk can access CE through a network of access points (211, Housing Resource Centers, Outreach Teams) which screen, assess, prioritize, refer or match eligible people to a variety of housing programs including prevention and legal services, housing navigation, shelter, transitional housing, rapid rehousing, and permanent supportive housing. CE uses a housing first approach and targets support for households with the greatest needs. It is accessible 24/7, with virtual and in-person access points. Countywide outreach teams offer services to homeless households that are not willing or able to be served through any other access point. All CE providers uses the Housing Crisis Response System Manual, approved by the CoC, and its standard components include safety and housing crisis screening, housing problem solving, CE Assessment, prioritization, and matching. CE uses a standardized Access Packet which includes the CE Assessment, a comprehensive tool to determine need, priority, and eligibility for housing or services. All literally homeless assessed households are included on the By-Name List and ranked in order of priority using a standard scoring method based on household characteristics, vulnerabilities, longer histories of homelessness, and housing barriers. CE is evaluated to support quality improvement based on performance and feedback from stakeholders via the System Coordination and Results Based Accountability (RBA) committees. Quality assurance includes monitoring the performance of the comprehensive assessment tool and the distribution of vulnerability scores across all households and within specific groups including chronically homeless, veterans, TAY, families, and seniors. The RBA Committee has set system performance measures designed to assess system coordination including length of time from assessment to match, referral to enrollment, and from assessment to permanent housing.
### 1D. Continuum of Care (CoC) Discharge Planning

**Instructions:**
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

#### 1D-1. Discharge Planning–State and Local.
Applicants must indicate whether the CoC has a discharge policy to ensure persons discharged from the systems of care listed are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

<table>
<thead>
<tr>
<th>System of Care</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Foster Care:</td>
<td>X</td>
</tr>
<tr>
<td>Health Care:</td>
<td>X</td>
</tr>
<tr>
<td>Mental Health Care:</td>
<td>X</td>
</tr>
<tr>
<td>Correctional Facilities:</td>
<td>X</td>
</tr>
<tr>
<td>None:</td>
<td></td>
</tr>
</tbody>
</table>

#### 1D-2. Discharge Planning Coordination.
Applicants must indicate whether the CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

<table>
<thead>
<tr>
<th>System of Care</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Foster Care:</td>
<td>X</td>
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<td>Mental Health Care:</td>
<td>X</td>
</tr>
<tr>
<td>Correctional Facilities:</td>
<td>X</td>
</tr>
<tr>
<td>None:</td>
<td></td>
</tr>
</tbody>
</table>
1E. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Project Ranking and Selection. Applicants must indicate whether the CoC used the following to rank and select project applications for the FY 2018 CoC Program Competition:

(1) objective criteria;
(2) at least one factor related to achieving positive housing outcomes;
(3) a specific method for evaluating projects submitted by victim services providers; and
(4) attach evidence that supports the process selected.

<table>
<thead>
<tr>
<th>Used Objective Criteria for Review, Rating, Ranking and Section</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Included at least one factor related to achieving positive housing outcomes</td>
<td>Yes</td>
</tr>
<tr>
<td>Included a specific method for evaluating projects submitted by victim service providers</td>
<td>Yes</td>
</tr>
</tbody>
</table>

1E-2. Severity of Needs and Vulnerabilities. Applicants must describe:

(1) the specific severity of needs and vulnerabilities the CoC considered when reviewing, ranking, and rating projects; and
(2) how the CoC takes severity of needs and vulnerabilities into account during the review, rating, and ranking process.

(limit 2,000 characters)

Projects are scored on a 100-point scale, up to 10 points awarded for projects serving those with more severe need and vulnerabilities. The CoC prioritizes chronically homeless, DV survivors, transition aged youth, veterans, and people on the street in its rating and ranking process. PSH projects serving 100% chronically homeless households earn the full 10 points, while new PSH/DedicatedPLUS projects earn 9 points, and rapid rehousing for families and TAY earn 8 points. Projects can also earn 8 points if 75% of those served came directly from the streets. Projects serving 80% veterans, TAY or those fleeing DV can earn up to 6 points of the 10. All claims are backed up by APR data. 10 additional points are awarded to projects that demonstrate housing first principles, including specific points for those that have written documentation which shows they do not reject individuals and families with criminal histories, provide low barriers to entry and voluntary participation in services, and prioritize rapid placement and stabilization in permanent housing -showing eviction back to homelessness is avoided. This year’s process included 10 Housing First (HF) technical assistance sessions for projects to better align with HF practices, and further reduce barriers to housing for individuals and families.
with prior evictions, credit or criminal histories, offer voluntary services, and increase housing retention and harm reduction housing through review of housing applications and lease revisions. Projects that resubmitted documentation in alignment with HF received extra points. The CoC also encouraged and incentivized new projects through the expansion of permanent housing projects, reallocation or DV Bonus targeting 100% chronically homeless individuals and families, people with high needs coming from the streets, and DV survivors. Given the DV Bonus project was completely new in the CoC application, the NOFA Committee provided additional time to DV Bonus applicants.

1E-3. Public Postings. Applicants must indicate how the CoC made public:

(1) objective ranking and selection process the CoC used for all projects (new and renewal);

(2) CoC Consolidated Application— including the CoC Application, Priority Listings, and all projects accepted and ranked or rejected, which HUD required CoCs to post to their websites, or partners websites, at least 2 days before the CoC Program Competition application submission deadline; and

(3) attach documentation demonstrating the objective ranking, rating, and selections process and the final version of the completed CoC Consolidated Application, including the CoC Application with attachments, Priority Listing with reallocation forms and all project applications that were accepted and ranked, or rejected (new and renewal) was made publicly available, that legibly displays the date the CoC publicly posted the documents.

<table>
<thead>
<tr>
<th>Public Posting of Objective Ranking and Selection Process</th>
<th>Public Posting of CoC Consolidated Application including: CoC Application, Priority Listings, Project Listings</th>
</tr>
</thead>
<tbody>
<tr>
<td>CoC or other Website</td>
<td>□ CoC or other Website</td>
</tr>
<tr>
<td>Email</td>
<td>□ Email</td>
</tr>
<tr>
<td>Mail</td>
<td>□ Mail</td>
</tr>
<tr>
<td>Advertising in Local Newspaper(s)</td>
<td>□ Advertising in Local Newspaper(s)</td>
</tr>
<tr>
<td>Advertising on Radio or Television</td>
<td>□ Advertising on Radio or Television</td>
</tr>
<tr>
<td>Social Media (Twitter, Facebook, etc.)</td>
<td>□ Social Media (Twitter, Facebook, etc.)</td>
</tr>
</tbody>
</table>

1E-4. Reallocation. Applicants must indicate whether the CoC has cumulatively reallocated at least 20 percent of the CoC’s ARD between the FY 2014 and FY 2018 CoC Program Competitions.

Reallocation: Yes

1E-5. Local CoC Competition. Applicants must indicate whether the CoC: (1) established a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline—attachment required;
(2) rejected or reduced project application(s)—attachment required; and
(3) notify applicants that their project application(s) were being rejected or
reduced, in writing, outside of e-snaps, at least 15 days before FY 2018
CoC Program Competition Application deadline—attachment required.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Did the CoC establish a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline? Attachment required.</td>
<td>Yes</td>
</tr>
<tr>
<td>(2) If the CoC rejected or reduced project application(s), did the CoC notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline? Attachment required.</td>
<td>Yes</td>
</tr>
<tr>
<td>(3) Did the CoC notify applicants that their applications were accepted and ranked on the Priority Listing in writing outside of e-snaps, at least 15 before days of the FY 2018 CoC Program Competition Application deadline?</td>
<td>Yes</td>
</tr>
</tbody>
</table>
2A. Homeless Management Information System (HMIS) Implementation

Instructions:
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Roles and Responsibilities of the CoC and HMIS Lead. Does your CoC have in place a Governance Charter or other written documentation (e.g., MOU/MOA) that outlines the roles and responsibilities of the CoC and HMIS Lead? Attachment Required.

Yes

2A-1a. Applicants must:
(1) provide the page number(s) where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document(s) referenced in 2A-1, and
(2) indicate the document type attached for question 2A-1 that includes roles and responsibilities of the CoC and HMIS Lead (e.g., Governance Charter, MOU/MOA).


Yes

2A-3. HMIS Vendor. What is the name of the HMIS software vendor?

BitFocus

2A-4. HMIS Implementation Coverage Area. Using the drop-down boxes, applicants must select the HMIS implementation Coverage area.

Single CoC

2A-5. Bed Coverage Rate. Using 2018 HIC and HMIS data, applicants must report by project type:
(1) total number of beds in 2018 HIC; and
(2) total beds dedicated for DV in the 2018 HIC; and
### (3) total number of beds in HMIS.

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Total Beds in 2018 HIC</th>
<th>Total Beds in HIC Dedicated for DV</th>
<th>Total Beds in HMIS</th>
<th>HMIS Bed Coverage Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Shelter (ES) beds</td>
<td>872</td>
<td>180</td>
<td>501</td>
<td>72.40%</td>
</tr>
<tr>
<td>Safe Haven (SH) beds</td>
<td>12</td>
<td>0</td>
<td>12</td>
<td>100.00%</td>
</tr>
<tr>
<td>Transitional Housing (TH) beds</td>
<td>752</td>
<td>12</td>
<td>660</td>
<td>89.19%</td>
</tr>
<tr>
<td>Rapid Re-Housing (RRH) beds</td>
<td>602</td>
<td>0</td>
<td>529</td>
<td>87.87%</td>
</tr>
<tr>
<td>Permanent Supportive Housing (PSH) beds</td>
<td>2,925</td>
<td>32</td>
<td>2,267</td>
<td>78.36%</td>
</tr>
<tr>
<td>Other Permanent Housing (OPH) beds</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

2A-5a. To receive partial credit, if the bed coverage rate is 84.99 percent or lower for any of the project types in question 2A-5., applicants must provide clear steps on how the CoC intends to increase this percentage for each project type over the next 12 months. (limit 2,000 characters)

ES: We were successful this year in on-boarding agencies that have been reluctant to join in the past by offering them staff support during the Point-In-Time count. We have added the 74 (7%) bed Salvation Army project and will work with them to get data entered this year. We have created a project for the Second Chance 42 (4%) bed shelter and they have agreed to begin entering data.

PSH: 13% of the CoC’s PSH is made up of VASH vouchers through the Oakland and Alameda County Housing Authorities. We will increase efforts to garner their participation in HMIS for data collection. For the remaining 9% of non-participating providers, we will reach out to property managers and service providers to have them join the CoC for Coordinated Entry with the goal of providing them with more rapid filling of vacancies.


2A-7. CoC Data Submission in HDX. Applicants must enter the date the CoC submitted the 2018 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy) 04/30/2018
2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. PIT Count Date. Applicants must enter the date the CoC conducted its 2018 PIT count (mm/dd/yyyy).

01/30/2018

2B-2. HDX Submission Date. Applicants must enter the date the CoC submitted its PIT count data in HDX (mm/dd/yyyy).

04/30/2018
2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2C-1. Change in Sheltered PIT Count Implementation. Applicants must describe any change in the CoC’s sheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018. Specifically, how those changes impacted the CoC’s sheltered PIT count results. (limit 2,000 characters)

Not Applicable

2C-2. Did your CoC change its provider coverage in the 2018 sheltered count?  No

2C-2a. If “Yes” was selected in 2C-2, applicants must enter the number of beds that were added or removed in the 2018 sheltered PIT count.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Beds Added:</td>
<td>0</td>
</tr>
<tr>
<td>Beds Removed:</td>
<td>0</td>
</tr>
<tr>
<td>Total:</td>
<td>0</td>
</tr>
</tbody>
</table>

2C-3. Presidentially Declared Disaster Changes to Sheltered PIT Count. Did your CoC add or remove emergency shelter, transitional housing, or Safe Haven inventory because of funding specific to a Presidentially declared disaster, resulting in a change to the CoC’s 2018 sheltered PIT count?  No

2C-3a. If “Yes” was selected for question 2C-3, applicants must enter the number of beds that were added or removed in 2018 because of a Presidentially declared disaster.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Beds Added:</td>
<td>0</td>
</tr>
<tr>
<td>Beds Removed:</td>
<td>0</td>
</tr>
<tr>
<td>Total:</td>
<td>0</td>
</tr>
</tbody>
</table>
2C-4. Changes in Unsheltered PIT Count Implementation. Did your CoC change its unsheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018? If your CoC did not conduct and unsheltered PIT count in 2018, select Not Applicable. Not Applicable

2C-5. Identifying Youth Experiencing Homelessness in 2018 PIT Count. Did your CoC implement specific measures to identify youth experiencing homelessness in its 2018 PIT count? No

2C-6. 2018 PIT Implementation. Applicants must describe actions the CoC implemented in its 2018 PIT count to better count:
(1) individuals and families experiencing chronic homelessness;
(2) families with children experiencing homelessness; and
(3) Veterans experiencing homelessness.
(limit 2,000 characters)
Not Applicable
3A. Continuum of Care (CoC) System Performance

Instructions
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. First Time Homeless as Reported in HDX. In the box below, applicants must report the number of first-time homeless as reported in HDX.

| Number of First Time Homeless as Reported in HDX. | 2,979 |

3A-1a. Applicants must:
(1) describe how the CoC determined which risk factors the CoC uses to identify persons becoming homeless for the first time;
(2) describe the CoC’s strategy to address individuals and families at risk of becoming homeless; and
(3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the number of individuals and families experiencing homelessness for the first time. (limit 2,000 characters)

The CoC had 168 (Metric 5.1) and 291 (Metric 5.2) more first-time homeless than last year. The CoC added prevention strategies through its CE implementation including for those not yet literally homeless. 211 and assessors engage in housing problem solving conversations that explore every personal and mainstream resource available to help avoid homelessness. CE prevention services (information and referral, legal services, benefits advocacy, housing problem solving and one-time financial assistance) target those on the verge of losing their housing and assist them to retain their current living situation or relocate without becoming homeless, but the resources do not match the scale of the problem. The CoC has performed an analysis of HUD’s annual system performance measures to assess the number of people entering and exiting the homeless safety net and evaluate the capacity of the current system to serve people experiencing homelessness. Using PIT census data, EveryOne Home estimates that 12,000 people experience homelessness annually in the CoC. Of those 12,000 roughly 3,000 unduplicated people became homeless for the first time in 2017, while 1,400 people exited homelessness to permanent housing. Systems level changes are needed to increase capacity while also preventing people from becoming homeless by working in closer collaboration with other systems such as the criminal justice, work force development, and education. The Plan Update is asking jurisdictional stakeholders to adopt the target of reducing first time homelessness by 500 persons year over year by implementing renter protections, increasing temporary financial assistance, a flexible subsidy pool for households on fixed incomes, and increasing connection to cash income and mainstream benefits. Everyone Home’s Systems Analyst oversees this metric and will continue to use data to guide strategic conversations to reduce
first time homelessness through the RBA Committee.

3A-2. Length-of-Time Homeless as Reported in HDX. Applicants must:
(1) provide the average length of time individuals and persons in families remained homeless (i.e., the number);
(2) describe the CoC’s strategy to reduce the length-of-time individuals and persons in families remain homeless;
(3) describe how the CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and
(4) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the length of time individuals and families remain homeless.
(limit 2,000 characters)

On average, individuals and families remained homeless for 170 nights in 2017, a decrease of 16 nights from 2016. The median length of time homeless was 93 nights in 2017, a decrease of 21 nights from 2016. The CoC aims to reduce average length of time homeless through coordinated entry by prioritizing resources to households with the longest duration of homelessness and the highest barriers to housing. This prioritization strategy will increase the resources accessible to households experiencing long durations of homelessness and end their homelessness. In keeping with this effort, the CoC provides technical assistance and training to build a housing-first culture that effectively engages vulnerable persons who historically have been the most difficult to house and continues to increase RRH units to assist individuals and families to obtain stable housing faster. In addition, the CoC has begun looking closely at the record level data that comprises this metric. We have found that the 77-night gap between the average and median lengths of time homeless is a consequence of a small but significant group of about 50 people who have been homeless for more than 2 years. Their extremely long lengths of homelessness offset the majority with much shorter lengths. We expect that these persons have high vulnerabilities both because of their length of time homeless as well as their demographic characteristics: 43% are seniors and 24% are TAY headed households with minor children. As a system, we have identified and are working to engage these persons in coordinated entry activities. If successful, we could quickly bring down system averages. EveryOne Home’s System Analyst oversee this metric and will continue to use data to guide strategic conversations to reduce length of time through the RBA Committee.

3A-3. Successful Permanent Housing Placement and Retention as Reported in HDX. Applicants must:
(1) provide the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid re-housing that exit to permanent housing destinations; and
(2) provide the percentage of individuals and persons in families in permanent housing projects, other than rapid rehousing, that retain their permanent housing or exit to permanent housing destinations.

<table>
<thead>
<tr>
<th>Percentage</th>
<th>46%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid re-housing that exit to permanent housing destinations as reported in HDX.</td>
<td></td>
</tr>
</tbody>
</table>
3A-3a. Applicants must:
(1) describe the CoC’s strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations; and
(2) describe the CoC’s strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations.
(limit 2,000 characters)

The CoC continues to maintain a high rate of permanent housing retention, which increased by 1% from 2016, and experienced a slight decrease (1%) in successful permanent housing exits. To increase the proportion of people exiting sheltered homelessness to permanent housing, the CoC has expanded housing navigation resources through CE, with the intention of providing a housing navigator to every household in emergency shelter. The CoC also continues to expand RRH and Landlord Liaison services with an eye toward quick and flexible housing options in the private market. To address the lack of affordable housing and increase the number of permanent housing units for people experiencing homelessness, EveryOne Home’s Strategic Plan Update asks jurisdictional partners to adopt the county-wide target of housing 500 more individuals year over year by creating a flexible subsidy pool; linking subsidies to affordable housing developments to ensure access by homeless people; expanding and strengthening the team of landlord partners; growing the stock of permanent supportive housing; and increasing the stock of alternative housing opportunities such as shared housing, ADUs, and microunits. Once in housing, our system has expanded tenancy sustain services to ensure adequate support for households that struggle to retain housing. As mentioned above, the CoC is also growing the spectrum of prevention resources and working to prioritize households at highest risk of homelessness. The CoC continues to advocate investments in permanent housing solutions. As local and State resource expand, EveryOne Home's System Analyst and RBA Committee will track progress toward permanent housing exits and retention targets on a quarterly basis. The data will guide strategic conversations about increasing exits to permanent housing.

3A-4. Returns to Homelessness as Reported in HDX. Applicants must report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX.

<table>
<thead>
<tr>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>5%</td>
</tr>
</tbody>
</table>

3A-4a. Applicants must:
(1) describe how the CoC identifies common factors of individuals and persons in families who return to homelessness;
(2) describe the CoC’s strategy to reduce the rate of additional returns to homelessness; and
(3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the rate individuals and persons in families returns to homelessness.

(limit 2,000 characters)

Although the CoC has increased the number of people exiting to permanent housing since 2015, the rate of returns to homelessness has remained relatively flat at between 18% and 19% within 24 months. In 2017 there was an increase in the proportion of people who returned to homelessness within 6-12 months of obtaining permanent housing. RRH projects have been a common factor among individuals and families who return to homelessness. During the past year, the CoC has revisited RRH policies to ensure that the proportion of rent RRH participants pay increases gradually, versus suddenly at program end. RRH programs use the CTI model to ensure that households are connected to neighborhood and mainstream supports before exiting CoC-funded services. In the last 12 months, the CoC has increased landlord liaison and tenancy sustaining services to mediate landlord relationships and provide support to tenants. The CoC has also developed the 211 operators' capacity to provide housing problem-solving conversations and referrals to prevent homelessness. Developing the housing crisis response system in these ways will help sustain permanent housing for formerly homeless people. In the coming year, the RBA Committee and System Analyst will focus attention to obtaining and analyzing record level data from HMIS on the individuals and families who return to homelessness in 2017. We anticipate being able to identify best practices and areas for technical assistance using this data. Everyone Home's System Analyst will be overseeing the strategy to reduce returns to homelessness.

3A-5. Job and Income Growth. Applicants must:
(1) describe the CoC’s strategy to increase access to employment and non-employment cash sources;
(2) describe how the CoC works with mainstream employment organizations to help individuals and families increase their cash income; and
(3) provide the organization name or position title that is responsible for overseeing the CoC’s strategy to increase job and income growth from employment.
(limit 2,000 characters)

27% of adult system stayers increased their total income in FY 2017, an increase of 8% over the previous year. This includes a 2% increase in earned income by adult system stayers in 2017 and a 7% increase in non-employment cash income by adult system stayers in 2017. The CoC directs programs to assess income and non-cash benefits of all participants at intake and upon re-eligibility to ensure they are informed of and supported to access all resources for which they are eligible. Participants are connected to non-CoC funded, homeless-specific and general employment services. Mainstream partners fund legal assistance that sends staff to housing programs to assist with benefits applications and hearings. Health Care for the Homeless funds a contract with LifeLong Medical Care for integrated primary and behavioral health care for people with serious health issues on GA while applying for SSI. The County Social Services Agency oversees the strategy to increase funded client incomes. The Strategic Update Plan calls for increased capacity for participants’ connection to income and benefits. For those who are employable, the Plan recommends the expansion of job training, apprenticeship and
educational opportunities for people with lived experience, including creating positions within the County Housing Crisis Response System workforce to improve service delivery and pilot a peer-to-peer training program. For the CoC-funded projects, the RBA Committee and System Analyst will continue to oversee this strategy and analyze HMIS data quarterly to evaluate progress and make further recommendations to increase jobs and income growth of participants.

3A-6. System Performance Measures Data Submission in HDX. Applicants must enter the date the CoC submitted the System Performance Measures data in HDX, which included the data quality section for FY 2017 (mm/dd/yyyy)

05/31/2018
3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Instructions
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3B-1. DedicatedPLUS and Chronically Homeless Beds. In the boxes below, applicants must enter:
(1) total number of beds in the Project Application(s) that are designated as DedicatedPLUS beds; and
(2) total number of beds in the Project Application(s) that are designated for the chronically homeless, which does not include those that were identified in (1) above as DedicatedPLUS Beds.

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of beds dedicated as DedicatedPLUS</td>
<td>1,097</td>
</tr>
<tr>
<td>Total number of beds dedicated to individuals and families</td>
<td>483</td>
</tr>
<tr>
<td>experiencing chronic homelessness</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>1,580</td>
</tr>
</tbody>
</table>

3B-2. Orders of Priority. Did the CoC adopt the Orders of Priority into their written standards for all CoC Program-funded PSH projects as described in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing? Attachment Required.

Yes

3B-2.1. Prioritizing Households with Children. Using the following chart, applicants must check all that apply to indicate the factor(s) the CoC currently uses to prioritize households with children during FY 2018.

<table>
<thead>
<tr>
<th>Factor</th>
<th>Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>History of or Vulnerability to Victimization (e.g. domestic</td>
<td>X</td>
</tr>
<tr>
<td>violence, sexual assault, childhood abuse)</td>
<td></td>
</tr>
<tr>
<td>Number of previous homeless episodes</td>
<td>X</td>
</tr>
<tr>
<td>Unsheltered homelessness</td>
<td>X</td>
</tr>
<tr>
<td>Criminal History</td>
<td>X</td>
</tr>
<tr>
<td>Bad credit or rental history</td>
<td>X</td>
</tr>
<tr>
<td>Head of Household with Mental/Physical Disability</td>
<td>X</td>
</tr>
</tbody>
</table>
3B-2.2. Applicants must:
(1) describe the CoC’s current strategy to rapidly rehouse every household of families with children within 30 days of becoming homeless;
(2) describe how the CoC addresses both housing and service needs to ensure families successfully maintain their housing once assistance ends; and
(3) provide the organization name or position title responsible for overseeing the CoCs strategy to rapidly rehouse families with children within 30 days of becoming homeless.

CoC partners work to rehouse all homeless households within 30 days. Last year the median length of time spent homeless was 93 nights. The CoC has grown the stock of rapid re-housing available to households with children from 89 to 131 units, as documented in the HIC. In FY 2018 the COC implemented an assessment tool that prioritizes families with children under 5 and larger households to ensure that these households are quickly connected to permanent housing. The CoC believes this strategy combined with increases in the availability of rapid rehousing will reduce both the length of time homeless for families. All CoC funded family programs are low barrier, with no income, sobriety, or treatment requirements for entry. Housing navigators work with families immediately on income and benefits and getting “document ready” for housing. RRH options connect to every family shelter in the CoC include ESG, CoC, TANF, SSVF, and general funds, making it possible to match the best subsidy for the family through one intake process. All family RRH programs include both housing navigation to assist in locating housing, and stabilization supports after moving and up to six months post exit from subsidy. Stabilization supports focus on increasing income, non-cash benefits, and connect families to supports in their new communities include school-based services, recreation and child care health care, food banks and other resources to ensure families successfully maintain their housing. The City of Oakland Human Services Department and Alameda County HCD are the lead agencies on rehousing homeless families.

3B-2.3. Antidiscrimination Policies. Applicants must check all that apply that describe actions the CoC is taking to ensure providers (including emergency shelter, transitional housing, and permanent supportive housing (PSH and RRH) within the CoC adhere to antidiscrimination policies by not denying admission to or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status, or disability when entering a shelter or housing.

| CoC conducts mandatory training for all CoC and ESG funded service providers on these topics. | ☐ |
| CoC conducts optional training for all CoC and ESG funded service providers on these topics. | ☐ |
| CoC has worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients. | ☐ |
| CoC has worked with ESG recipient(s) to identify both CoC and ESG funded facilities within the CoC geographic area that may be out of compliance, and taken steps to work directly with those facilities to come into compliance. | ☑ |
| CoC has sought assistance from HUD through submitting AAQs or requesting TA to resolve non-compliance of service providers. | ☑ |

3B-2.4. Strategy for Addressing Needs of Unaccompanied Youth Experiencing Homelessness. Applicants must indicate whether the CoC’s
strategy to address the unique needs of unaccompanied homeless youth includes the following:

<table>
<thead>
<tr>
<th>Human trafficking and other forms of exploitation</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>LGBT youth homelessness</td>
<td>Yes</td>
</tr>
<tr>
<td>Exits from foster care into homelessness</td>
<td>Yes</td>
</tr>
<tr>
<td>Family reunification and community engagement</td>
<td>Yes</td>
</tr>
<tr>
<td>Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs</td>
<td>Yes</td>
</tr>
</tbody>
</table>

3B-2.5. Prioritizing Unaccompanied Youth Experiencing Homelessness Based on Needs. Applicants must check all that apply from the list below that describes the CoC’s current strategy to prioritize unaccompanied youth based on their needs.

<table>
<thead>
<tr>
<th>History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Previous Homeless Episodes</td>
<td>X</td>
</tr>
<tr>
<td>Unsheltered Homelessness</td>
<td>X</td>
</tr>
<tr>
<td>Criminal History</td>
<td>X</td>
</tr>
<tr>
<td>Bad Credit or Rental History</td>
<td>X</td>
</tr>
</tbody>
</table>

3B-2.6. Applicants must describe the CoC’s strategy to increase:
(1) housing and services for all youth experiencing homelessness by providing new resources or more effectively using existing resources, including securing additional funding; and
(2) availability of housing and services for youth experiencing unsheltered homelessness by providing new resources or more effectively using existing resources.

(limit 3,000 characters)

The CoC has partnered on several initiatives in the past that have transformed the system of care for youth in the County, including the Youth Transitions Partnership, to provide stable housing and supportive services to homeless and foster youth and the DA’s Human Exploitation and Trafficking unit, which identifies and links youth victims of commercial and sexual with services to ensure safety. In early 2018, the Social Services Agency, the Interagency Children’s Policy Council, and the CoC Lead signed a collaborative agreement to develop the Youth Action Board (YAB) of current and formerly homeless transition-age youth; participate in the 2018 Youth Homeless Demonstration Project; and leverage existing resources and secure additional funding to support efforts to end youth homelessness. The YAB was formed in April of 2018 as a working group of the CoC Board to determine gaps in housing and services and work closely in the planning and implementation of a coordinated community plan to prevent and end youth homelessness. The YAB is currently composed of 4 formerly homeless, African American foster care transition age youth (TAY), two of them parents, who are in the process of recruiting a diverse...
group of youth to play a leadership role in the 2019 Youth Count by assisting to
design the Count and recruit Youth Guides. The Youth Collaborative is also
planning to assist the CoC in applying for the Homeless Emergency Aid
Program ( HEAP), a new block grant that will provide a total of $16 million in
direct assistance to address the homelessness crisis in the County, of which 5%
must be used to establish or expand services to homeless and at risk youth. In
this package, the City of Oakland has voluntarily reallocated $400,000 in its
youth RRH funding by reducing subsidies by one third, as the partner youth
agencies have struggled to fully implement the program and expend all funds.
This strategic reallocation will assist Oakland and the CoC to fund new RRH
slots for unsheltered, single adults which constitute the largest unsheltered
population in Oakland and the most under-resourced. The planning and
implementation work led by the YAB will ensure effective use of the remaining
RRH slots for youth along with the added housing resources anticipated from
the new State Funds.

3B-2.6a. Applicants must:
(1) provide evidence the CoC uses to measure both strategies in question
3B-2.6. to increase the availability of housing and services for youth
experiencing homelessness;
(2) describe the measure(s) the CoC uses to calculate the effectiveness of
the strategies; and
(3) describe why the CoC believes the measure it uses is an appropriate
way to determine the effectiveness of the CoC’s strategies.
(limit 3,000 characters)

The CoC has improved its ability to measure the needs and outcomes of youth
experiencing homelessness in the CoC. It now conducts a youth specific count
biannually that includes homeless and formally homeless youth as expert
guides in identifying and surveying youth in the count. Following the
recommendation to create a prioritized pathway for youth within the system, the
Coordinated Entry standard assessment tool prioritizes households based on
vulnerability, taking into consideration length of homelessness, household
configuration, housing barriers, safety and risk, health conditions, and
disabilities. In this framework, transition-age youth headed households receive
additional weight in the prioritization, and pregnant and parenting TAY are
further elevated in the prioritization. The tool also prioritizes households in
which members have engaged in risky survival strategies as well as those with
histories of running away from a family, group, or foster home. In these areas,
the tool seeks to recognize and respond to the unique challenges faced by
homeless TAY. Although the CoC designed a single tool for all populations, it
was specifically tested with youth-serving organizations. The resulting set of
questions and prompts are designed to elicit the information necessary to
properly prioritize TAY-headed households. In addition, staff from youth-
focused agencies, such as Covenant House and First Place for Youth, have
been trained to be certified assessors and to administer the assessment tool in
a way that is relevant and youth-friendly. As a continuum, we are closely
watching the TAY population. Each quarter the System Analyst provides a
detailed analysis of TAY households distribution of prioritization scores and a
comparison to the population at large. We are seeing a normal distribution of
scores among TAY households, and that the distribution is slightly lower than
the general population. As a continuum, this data reinforces the need for
housing and service resources that are dedicated to serving homeless TAY.
3B-2.7. Collaboration–Education Services. Applicants must describe how the CoC collaborates with:

1. youth education providers;
2. McKinney-Vento State Education Agency (SEA) and Local Education Agency (LEA);
3. school districts; and
4. the formal partnerships with (1) through (3) above.

(limit 2,000 characters)

The Alameda County Office of Education McKinney-Vento (MKV) works with the CoC as well as with 17 school districts and charter schools. Each public school has an MKV liaison who provides limited support services to students experiencing homelessness. CoC staff participated in the most recent MKV Strategic Planning meeting on 8/15/18 during which MKV Needs Assessment findings were released by the County Office of Education. Key themes included lack of time for students to do their work; learning challenges experienced by students; lack of cultural competency among teachers; and lack of affordable housing. The Needs assessment will inform a capacity building strategy for county-wide and district level MKV programs, in which the CoC will actively participate. The CoC has also been invited to collaborate to increase access and linkages with MKV programs for households with children living in shelters, awareness of homelessness throughout school districts, and supporting the academic needs of homeless youth. The County MKV program was recently awarded a 3-year grant to add staff to provide training to districts on the educational needs of homeless children, inform county-wide policies, and formally participate in CoC committees. Several CoC funded projects operate educational centers that offer after school and summer activities on-site. Agencies also meet with school staff and teachers to develop and evaluate students' IEPs. One housing provider is a member of HouseEd, a program to promote high quality education services at housing sites. Its staff are licensed administrators for the City of Alameda online student documentation program, to monitor homework, attendance, grades and overall student performance. By increasing focus on academic services for teens 4 years ago, the project has seen a significant increase in school success: 80% of program participants were once failing school, now 80% are earning a 2.5 GPA or higher.

3B-2.7a. Applicants must describe the policies and procedures the CoC adopted to inform individuals and families who become homeless of their eligibility for education services.

(limit 2,000 characters)

It is CoC policy that school-aged children are enrolled within 5 days of program entry. Districts have procedures in place to facilitate rapid enrollment and stays to the end of a semester when a family relocates. Staff assesses educational needs at in-take and informs families of educational services for which they are eligible and provides advocacy with school districts to ensure desired services are accessed. Verification letters for school's free lunch programs, school site resources (i.e. tutoring and counseling services) and any other services needed to protect educational rights of the child are provided as needed. Family and youth serving agencies in the CoC attend quarterly provider meetings for several districts to ensure children and youth access services and programs that best meet their needs, such as literacy skills, earning their GED, or
complete certificates at vocational schools or community colleges.

3B-2.8. Does the CoC have written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select “Yes” or “No”. Applicants must select “Yes” or “No”, from the list below, if the CoC has written formal agreements, MOU/MOA’s or partnerships with providers of early childhood services and support.

<table>
<thead>
<tr>
<th>Early Childhood Providers</th>
<th>MOU/MAO</th>
<th>Other Formal Agreement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head Start</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Early Head Start</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Child Care and Development Fund</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Federal Home Visiting Program</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Healthy Start</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Public Pre-K</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Birth to 3 years</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Tribal Home Visiting Program</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Other: (limit 50 characters)</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

3B-3.1. Veterans Experiencing Homelessness. Applicants must describe the actions the CoC has taken to identify, assess, and refer Veterans experiencing homelessness, who are eligible for U.S. Department of Veterans Affairs (VA) housing and services, to appropriate resources such as HUD-VASH, Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD).

CoC coordinates Operation Vets Home (OVH), which includes all SSVF grantees, Grant per Diem providers, the VA HUD VASH, and others. The three SSVF grantees collaborate closely with the Housing Resource Centers in Alameda County’s Coordinated Entry to receive and make referrals. Relationships with community resources, including cities, ensure that Veteran focused outreach workers are available at multi-service centers, meals and drop-in sites where veterans may seek service. Provider agencies can complete a one-page referral form with ROI and e-fax it to the CoC who maintains a by-name Master List of all homeless Vets and will connect the Vet to a SSVF provider and/or the VA who determines eligibility and best service match. Anyone who has been assessed into Coordinated Entry and who is not connected with SSVF will also receive follow-up from SSVF services. In April 2017, the CoC Board voted to prioritize all PSH for chronically homeless vets not eligible for VA medical benefits to finish the job ending chronic veteran homelessness.

3B-3.2. Does the CoC use an active list or by name list to identify all Veterans experiencing homelessness in the CoC? Yes
3B-3.3. Is the CoC actively working with the VA and VA-funded programs to achieve the benchmarks and criteria for ending Veteran homelessness? Yes

3B-3.4. Does the CoC have sufficient resources to ensure each Veteran experiencing homelessness is assisted to quickly move into permanent housing using a Housing First approach? No

3B-5. Racial Disparity. Applicants must:
(1) indicate whether the CoC assessed whether there are racial disparities in the provision or outcome of homeless assistance;
(2) if the CoC conducted an assessment, attach a copy of the summary.

Yes

3B-5a. Applicants must select from the options below the results of the CoC’s assessment.

| People of different races or ethnicities are more or less likely to receive homeless assistance. |   |
| People of different races or ethnicities are more or less likely to receive a positive outcome from homeless assistance. |   |
| There are no racial disparities in the provision or outcome of homeless assistance. | X |
| The results are inconclusive for racial disparities in the provision or outcome of homeless assistance. |   |

3B-5b. Applicants must select from the options below the strategies the CoC is using to address any racial disparities.

| The CoC’s board and decisionmaking bodies are representative of the population served in the CoC. |   |
| The CoC has identified steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC. |   |
| The CoC is expanding outreach in geographic areas with higher concentrations of underrepresented groups. |   |
| The CoC has communication, such as flyers, websites, or other materials, inclusive of underrepresented groups |   |
| The CoC is training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness. |   |
| The CoC is establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector. |   |
| The CoC has staff, committees or other resources charged with analyzing and addressing racial disparities related to homelessness. |   |
| The CoC is educating organizations, stakeholders, boards of directors for local and national non-profit organizations working on homelessness on the topic of creating greater racial and ethnic diversity. |   |
The CoC reviewed coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness.

The CoC is collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system.

The CoC is conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness.

Other:
4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:
For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

4A-1. Healthcare. Applicants must indicate, for each type of healthcare listed below, whether the CoC:
(1) assists persons experiencing homelessness with enrolling in health insurance; and
(2) assists persons experiencing homelessness with effectively utilizing Medicaid and other benefits.

<table>
<thead>
<tr>
<th>Type of Health Care</th>
<th>Assist with Enrollment</th>
<th>Assist with Utilization of Benefits?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Health Care Benefits</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>(State or Federal benefits, Medicaid, Indian Health Services)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Private Insurers:</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Non-Profit, Philanthropic:</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Other: (limit 50 characters)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4A-1a. Mainstream Benefits. Applicants must:
(1) describe how the CoC works with mainstream programs that assist persons experiencing homelessness to apply for and receive mainstream benefits;
(2) describe how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for persons experiencing homelessness (e.g., Food Stamps, SSI, TANF, substance abuse programs); and
(3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy for mainstream benefits. (limit 2,000 characters)

The CoC partners with Alameda County Health Care Services Agency (HCSA) in the Medicaid Waiver program focused on housing stability for the highest cost, sickest patients in their system, many of whom are homeless. Services funded include CE, Housing Navigation, Housing Case Management, Landlord Liaisons, a Landlord Risk Mitigation fund, and legal assistance. A primary job duty of housing navigators is to assist with mainstream benefits enrollment. The TRUST Clinic, another HCSA partnership, provides health care for homeless people and improves Social Security benefits access using approaches promoted by SOAR. The Health Care for the Homeless program also funds two Street Medicine programs that provide medical outreach to homeless people living in public places, with benefit enrollment specialists included in the
outreach teams. In addition, Alameda County SSA has been awarded $1,962,954 from the California Department of Social Services’ Housing & Disability Advocacy Program (HDAP), in partnership with Alameda County Behavioral Health Care Services (BHCS). HDAP will provide outreach, case management, disability advocacy, and housing navigation and assistance to General Assistance (GA) clients who are homeless and SSI eligible for three years. HDAP seeks to ensure homeless GA clients with the highest needs are provided timely services including housing navigation, disability advocacy, and housing research and financial assistance to return to permanent housing as quickly as possible. Funds include provision of housing financial assistance, through an expansion of HCSA’s contract with Bay Area Community Services (BACS). SSA will work in partnership with the HCSA’s Alameda County Care Connect team to help clients navigate housing resources and place clients into permanent supportive housing. The CoC and HCSA distribute updates from mainstream partners via email, meetings and trainings. HCSA is the lead on these efforts.

### 4A-2. Housing First: Applicants must report:

1. total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition; and
2. total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach—meaning that the project quickly houses clients without preconditions or service participation requirements.

<table>
<thead>
<tr>
<th>Item</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition</td>
<td>48</td>
</tr>
<tr>
<td>Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach—meaning that the project quickly houses clients without preconditions or service participation requirements</td>
<td>48</td>
</tr>
<tr>
<td>Percentage of new and renewal PSH, RRH, Safe-Haven, SSO non-Coordinated Entry projects in the FY 2018 CoC Program Competition that will be designated as Housing First</td>
<td>100%</td>
</tr>
</tbody>
</table>

### 4A-3. Street Outreach. Applicants must:

1. describe the CoC’s outreach;
2. state whether the CoC’s Street Outreach covers 100 percent of the CoC’s geographic area;
3. describe how often the CoC conducts street outreach; and
4. describe how the CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance. (limit 2,000 characters)

Street-level outreach is a critical tool for engaging vulnerable homeless people and is focused on unsheltered individuals. Workers seek to meet the immediate needs of individuals encountered and offer connections to available services. Teams are trained to “bring the front door” to those who need additional support in receiving care, and perform all key CE functions (Screening, Housing Problem Solving, Assessment, and Prioritization) in the field, rather than requiring clients to travel to a service site. Clients are supported with whatever it...
takes to access housing assistance, including regular follow-up, connections to emergency shelter, and making a warm hand-off to staff associated with housing opportunities. Outreach covers 100% of the CoC geographic area, and operates on varying schedules, including mornings, weekends, and evenings. Call center operators and outreach workers speak multiple languages, have translation services, and TTY machines available to assist with access. Street Outreach is a priority area of expansion under the Strategic Plan Update.

4A-4. Affirmative Outreach. Applicants must describe:
(1) the specific strategy the CoC implemented that furthers fair housing as detailed in 24 CFR 578.93(c) used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status or disability; and
(2) how the CoC communicated effectively with persons with disabilities and limited English proficiency fair housing strategy in (1) above. (limit 2,000 characters)

The CoC utilizes direct outreach and marketing, use of phone or internet services such as 211 and listserv (2000+ names), and making physical and virtual locations accessible to those with disabilities. In addition, the CoC accommodates formerly homeless voting members of the CoC living with disabilities by printing and delivering CoC-related documentation to their homes and providing individualized support and training as needed. The CoC’s latest implementation of furthering Fair Housing includes Housing First Technical Assistance sessions with housing developers and property managers to increase documentation alignment with housing first practices, including reviews and recommendations for CoC funded units’ Resident Selection Criteria, Applications and Rejection grounds, and Lease Agreements. Some of these sessions focused on providing guidance on HUD’s Application of Fair Housing Act Standards to the use of criminal history and records on housing decisions. The EOH Strategic Plan update is proposing to expand language accessibility to the housing crisis response system, including expanding capacity so more people experiencing housing crisis have access to multilingual materials and staff can assist them in their native language.

4A-5. RRH Beds as Reported in the HIC. Applicants must report the total number of rapid rehousing beds available to serve all household types as reported in the Housing Inventory Count (HIC) for 2017 and 2018.

<table>
<thead>
<tr>
<th>RRH beds available to serve all populations in the HIC</th>
<th>2017</th>
<th>2018</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>443</td>
<td>602</td>
<td>159</td>
</tr>
</tbody>
</table>

4A-6. Rehabilitation or New Construction Costs. Are new proposed project applications requesting $200,000 or more in funding for housing rehabilitation or new construction?

No


No
Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children or youth defined as homeless under other Federal statutes?
## 4B. Attachments

**Instructions:**

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site: https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Required?</th>
<th>Document Description</th>
<th>Date Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>1C-5. PHA Administration Plan–Homeless Preference</td>
<td>No</td>
<td>PHA Administration Plan–Homeless Preference</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>1C-5. PHA Administration Plan–Move-on Multifamily Assisted Housing Owners’ Preference</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1C-8. Centralized or Coordinated Assessment Tool</td>
<td>Yes</td>
<td>CE Assessment Tool</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>1E-1. Objective Criteria–Rate, Rank, Review, and Selection Criteria (e.g., scoring tool, matrix)</td>
<td>Yes</td>
<td>CoC Rating and Ra...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>1E-3. Public Posting CoC-Approved Consolidated Application</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1E-3. Public Posting—Local Competition Rate, Rank, Review, and Selection Criteria (e.g., RFP)</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1E-4. CoC’s Reallocation Process</td>
<td>Yes</td>
<td>CoC Process for R...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>1E-5. Notifications Outside e-snaps—Projects Accepted</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1E-5. Notifications Outside e-snaps—Projects Rejected or Reduced</td>
<td>Yes</td>
<td>Project Rejection...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>1E-5. Public Posting—Local Competition Deadline</td>
<td>Yes</td>
<td>Local Competition...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>2A-1. CoC and HMIS Lead Governance (e.g., section of Governance Charter, MOU, MOA)</td>
<td>Yes</td>
<td>CoC and HMIS Lead...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>2A-2. HMIS–Policies and Procedures Manual</td>
<td>Yes</td>
<td>HMIS Policy and P...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>3A-6. HDX–2018 Competition Report</td>
<td>Yes</td>
<td>FY 2018 CoC Compe...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>3B-2. Order of Priority–Written Standards</td>
<td>No</td>
<td>Order of Priority</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>3B-5. Racial Disparities Summary</td>
<td>No</td>
<td>Racial Disparity ...</td>
<td>09/14/2018</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>----</td>
<td>---------------------</td>
<td>------------</td>
</tr>
<tr>
<td>4A-7.a. Project List–Persons Defined as Homeless under Other Federal Statutes (if applicable)</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attachment Details

Document Description: PHA Administration Plan

Attachment Details

Document Description:

Attachment Details

Document Description: CE Assessment Tool

Attachment Details

Document Description: CoC Rating and Ranking Procedure

Attachment Details

Document Description:

Attachment Details

Document Description: Part 1/2 Public Posting Project Selections,
Attachment Details

**Document Description:** CoC Process for Reallocation

Attachment Details

**Document Description:**

Attachment Details

**Document Description:** Project Rejection-Reduction Notification

Attachment Details

**Document Description:** Local Competition Deadline

Attachment Details

**Document Description:** CoC and HMIS Lead Governance
Document Description:  HMIS Policy and Procedures Manual

Attachment Details

Document Description:  FY 2018 CoC Competition Report

Attachment Details

Document Description:  Order of Priority

Attachment Details

Document Description:  Racial Disparity Assessment Summary

Attachment Details

Document Description:

Attachment Details
BERKELEY HOUSING AUTHORITY
ADMINISTRATIVE PLAN

For Section 8 Programs

2018-19

1936 University Avenue, Suite 150
Berkeley, CA 94704
c. Attempt to utilize the assistance to rent a unit in Berkeley for 24 months before becoming eligible for portability

Candidates for this program must have a written referral from the property manager and/or case manager.

Targeted Funding [24 CFR 982.204(e)]

HUD may award BHA funding for a specified category of families on the waiting list. BHA must use this funding only to assist the families within the specified category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

BHA Policy

For any specified category of families for which HUD may award funding to BHA, applicants will be selected in the following order:

1. Any manner set forth by HUD in funding award
2. If not set forth by HUD funding award, in the order of first come, first served.

HUD designated assistance or awarded funding to BHA in response to an application from BHA:

The waiting list is always open to an otherwise eligible homeless applicant referred to BHA for assistance by the research project/administration, up to the maximum number of vouchers approved for the project.

To the extent BHA is awarded funding (vouchers) under a HUD Notice of Funding Availability (NOFA) or other means, for any specific or broader-based category, BHA will:

- Review the current S8 Waiting list for a pending application and grant assistance in accordance with its position on the waiting list; or
- Reopen the waiting list to accept an eligible household, not presently on the waiting list.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

BHA must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that BHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated
plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

**BHA Policy**

- Resident families that at the time of selection from the waiting list, reside in the City of Berkeley, or include a member who works, or has been hired to work in the jurisdiction. Use of this preference will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family. (100 points)

- Veteran Preference (as required by State law). Granted to households with one or more active member(s) of the military, or a veteran discharged or released under conditions other than dishonorable, or a surviving spouse (as defined by the Department of Veteran Affairs) (50 points)

- Households with a project “Move-Up” referral (50 points)

- Family Unification/Emancipated Youth – with a Family Unification Plan from the governing jurisdiction (20 points)

- Elderly (62 or older), Disabled or Family (any 2- or more person household), status based on head of household or (10 points)

- Date and time of application (tie breaker).

**Section 8, Single Room Occupancy, Moderate Rehabilitation Program (Mod Rehab)**

The Single Room Occupancy, Moderate Rehabilitation program “Interest Lists” are managed by The Hub, operated by Berkeley Food and Housing Project and referred to Home Stretch, the Alameda County Health Care Services agency’s program. (See Chapter 18 for details.)

**Income Targeting Requirement [24 CFR 982.201(b)(2)]**

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during BHA’s fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, BHA may skip non-ELI families on the waiting list in order to select an ELI family. This means that 75% of BHA’s admissions must be at or below 30% of AMI; so 25% of BHA’s admissions may be at 31 – 50% AMI.

Low income families admitted to the program that are “continuously assisted” under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

**BHA Policy**

BHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families (up to 30% AMI) will be selected ahead of other eligible low-income (50% AMI) families on an as-needed basis to ensure the income
Administrative Plan

Updated and Approved
April 2017
Chapter 4 – Applications, Site-based Waiting Lists and Tenant Selection (Excerpt from ACOP - 2017 – page 4-13)

Local Preferences [24 CFR 960.206]

OHA is permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits OHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with OHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

OHA will use the following preferences to select families from the waiting list:

- A Veterans Preference (as required by state law);
- A Residency Preference (for persons living or working in Oakland);
- A Family Preference for applicant families with two or more persons, a single person applicant that is 62 years of age or older, or a single person applicant with a disability.
- A family preference for applicant families that are homeless at admission based on the McKinney Vento Act definition.

Applicants to the public housing conventional program, within the above preferences, will be selected from the waiting list in the order of their assigned lottery number and according to OHA preference(s) for which they qualify. Among applicants with the same preference, families will be selected according to a random selection process.

Chapter 4 – Applications, Site-based Waiting Lists and Tenant Selection (Excerpt from Administrative Plan - 2017 – page 4-13 – 4-14)

Local Preferences [24 CFR 982.207; HCV p. 4-16]

The PHA is permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA’s plan, the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

OHA Policy

OHA will use the following preferences to select families from the MTW Section 8 tenant-based voucher program waiting list:
- A Residency preference (Applicants who live or work in the City of Oakland at the time of the application interview and/or applicants that lived or worked in the City of Oakland at the time of submitting their initial application and can verify their previous residency/employment at the applicant interview, qualify for this preference).

- A Family preference (Applicant families with two or more persons, or a single person applicant that is 62 years of age or older, or a single person applicant with a disability, qualify for this preference).

- A Veteran and active members of the military preference.

- A DVP/DHAP assistance preference (Applicant families currently receiving Disaster Voucher Program (DVP) or Disaster Housing Assistance Program (DHAP) assistance from OHA and where DVP/DHAP program funding has expired, qualify for this preference (New admission for DVP/DHAP conversions is to limited 50 new admission families per calendar year).

- A Family Unification Program (FUP) conversion preference. OHA may expand the Family Unification Program (FUP) by converting certain families who were assisted by a targeted FUP voucher, to the Housing Choice Voucher (HCV) program. The families selected for this conversion must have successfully reunified, maintained housing independent of services and demonstrated stability in their assisted tenancy for a consecutive 3-year period. Emancipated foster youths admitted to the FUP program will also be evaluated at the end of their 18-month term and upon demonstrated stability in their FUP tenancy, may also be offered the opportunity for continued assistance under the Housing Choice Voucher program. The conversion of FUP assisted families to the Housing Choice Voucher program is limited to 15 or an amount to be determined at the discretion of the Executive Director or his designee families per calendar year.

Pending HUD approval of OHA participation in the FUP/FSS Demonstration program, FUP program participants who agree to sign an FSS Contract of Participation (Form HUD-52650) will maintain their housing assistance for a period not exceeding the length of the FSS Contract of Participation, including extensions.

If OHA participates in the Family Unification Program and Family Self-Sufficiency Demonstration per PIH Notice 2016-01, all provisions of the notice will be implemented and be in effect until amended, superseded or rescinded.

- A Shelter-Plus Care conversion preference. OHA may expand its Shelter-Plus Care program by converting certain families who are assisted by the Shelter-Plus Care program, operated in partnership with the County of Alameda. An OHA administered Shelter-Plus Care family who has maintained housing independent of services and who has demonstrated stability in their assisted tenancy for a consecutive 3-year period may be converted to the Housing Choice Voucher (HCV) program. The conversion of Shelter-Plus Care assisted families to the Housing Choice Voucher program is limited to 20 families per calendar year.
• **A Local Housing Assistance Program (LHAP) conversion preference.** A family assisted by the OHA administered Local Housing Assistance Program (LHAP is authorized under MTW and adopted by the OHA Board of Commissioners, December 7, 2009), may be converted to the Housing Choice Voucher (HCV) program subject to funding availability and applicant eligibility for admission the HCV program.

• **A Section 8 Homeownership Program preference.** Applicant families who meets all Family Eligibility criteria for participation in the Section 8 Homeownership program (Section 15-VII.B.), and who are a participant in good standing in any OHA administered program, qualify for this preference. (New admission to the Section 8 Homeownership program for families who are participants from other OHA programs (see Section 15-VII.C.) is limited 15 new admission families per calendar year). The families will be selected based on the order (date and time) in which their completed application is received by OHA under all available positions are filled.

• **A Homeless preference.** Applicant families who meet the McKinney-Vento Act definition of homelessness qualify for this preference.
4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16; CA Health & Safety Code Section 34322.2(a) and (b)]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

HACA Policy

Section 8 Housing Choice Voucher Program (HCV)

HACA applies the following preferences and priority:

- **Shortfall Terminated (250 points):** Participants of HACA’s HCV program that were terminated due to insufficient funding.
- **Shortfall Recalled (130 points):** Applicants on HACA’s HCV waiting list who received a voucher but had not yet utilized the voucher when it was recalled and were returned to the waiting list due to insufficient funding.
- **CHOICES or FACT Graduates (40 points):** Participants of the CHOICES or FACT programs sponsored by the Alameda County Behavioral Health Care Services Agency (BHCS), who, as determined by BHCS, are in good standing; are nearing the end of their participation; will soon graduate from the program; and, have been referred to HACA by BHCS. Applicants may not receive both the CHOICES or FACT Graduates preference and the MHSA Graduates preference.
- **Displaced-HACA (50 points):** Displaced family—HACA-owned or HACA-managed housing as set forth in the Glossary.
- **Displaced-Other (10 points):** Displaced family as set forth in the Glossary.
- **MHSA Graduates (40 points):** Participants of the State of California Mental Health Services Act (MHSA) shelter and services program sponsored by the Alameda County Behavioral Health Care Services Agency (BHCS), who, as determined by BHCS, are in good standing; are nearing the end of their participation; will soon graduate from the program; and, have been referred to HACA by BHCS.
- **Homeless (20 points):** Individual applicants or applicant families that verifiably lack housing, including one whose primary residence during the night is a supervised public or private facility that provides temporary living accommodations; an individual who is a resident in transitional housing; or an individual who has as a primary residence a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings as
confirmed by the applicant’s local homeless service organization or consortia of organizations.

- **Veteran (1 point):** Priority will be given to veterans or servicepersons as set forth in the *Glossary* within each preference category.

HACA will select applicants from its waiting list for HCV assistance in the following order:

1. Applicants for Targeted Funding as set forth in Section 4-III.B above
2. Shortfall Terminated families
3. Shortfall Recalled families
4. CHOICES, FACT or MHSA Program Graduates
5. Prior to assisting further applicants on the waiting list, HACA will assist the following families, in the following order:
   a. Current HCV participants whose moves have been denied due to insufficient funding.
   b. Currently housed Project-Based Voucher holders who have priority to receive the next available opportunity for continued tenant-based assistance as outlined in Section 17VII.C.
6. HACA will select remaining applicants on the waiting list.

Note #1: HACA will limit the number of applicants that may qualify for the Displaced-Other and Homeless preferences such that no more than five applicants from these preferences will be selected in any calendar month.

Note #2: For CHOICES, FACT, or MHSA Program Graduates:

a. HACA will conduct a lottery of MHSA, CHOICES and FACT Program graduates referred by BHCS and assist applicants in order of ascending lottery “tiebreaker” number (that is, applicants with a lower lottery “tiebreaker” number are selected before applicants with a higher one) except that veterans or servicepersons as set forth in the *Glossary* will be assisted before applicants who are not veterans or servicepersons.

b. HACA will limit the number of applicants that may qualify for this preference such that no more than 75 applicants of the combined MHSA, CHOICES and FACT graduates from this preference will be selected annually.

Preference points are aggregated to produce the total preference points for each applicant. Applicants with the same total preference points will then be sorted by the method in which they were selected to be placed on the waiting list (i.e., date and time of application or order of random selection).

**Section 8 Project-Based Voucher Program (PBV)**

HACA selectively applies the following preferences and priorities as set forth in the individual waiting lists listed below:
• **In-Place Family (400 points):** A PBV In-Place Family living in a PBV contract unit as set forth in Section 17-VI.B.

• **Displaced-Emeryville (2 points):** Qualified households who have been displaced as a result of the City of Emeryville’s or City of Emeryville Redevelopment Agency’s public projects or the City’s code enforcement activities.

• **Displaced-HACA (50 points):** Displaced family—HACA-owned or HACA-managed housing as set forth in the Glossary.

• **Displaced-Other (10 points):** Displaced family as set forth in the Glossary.

• **Homeless (20 points):** Individual applicants or applicant families that verifiably lack housing, including one whose primary residence during the night is a supervised public or private facility that provides temporary living accommodations; an individual who is a resident in transitional housing; or an individual who has as a primary residence a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings as confirmed by the applicant’s local homeless service organization or consortia of organizations.

• **CCT Participant (20 points):** Families that include at least one household member who is a person with a disability and a MediCal recipient who has resided in an institution for at least 90 days and is transitioning into the community as confirmed by the Non-Elderly Disabled (NED) program Lead Organization.

• **Voluntary Supportive Services (8 points):** Voluntary Supportive Services families as set forth in the Glossary.

• **Extremely Low-Income (30 points):** Families whose annual income does not exceed the higher of, by family size, 1) the federal poverty level applicable to the family; or 2) 30% of area median income (AMI), as determined by HUD.

• **Veteran (1 point):** Priority will be given to veterans or servicepersons as set forth in the Glossary within each preference category.

Preference points are aggregated to produce the total preference points for each applicant. Applicants with the same total preference points will then be sorted by the method in which they were selected to be placed on the waiting list (i.e., date and time of application or order of random selection).

Except for applicants referred by an owner participating in HACA’s PBV Program in instances when HACA failed to provide sufficient eligible families from the waiting list to fill a vacancy within 30 days of the owner’s notification to HACA of the vacancy, HACA will select as follows:

**WAITING LISTS**

**Carlow Court**

At least one household member must be age 62 or older to qualify.

50% AMI Units

Displaced-Other
Veteran

30% AMI Units
Displaced-Other
Extremely Low-Income
Veteran

Wexford Way

50% AMI Units
Displaced-Other
Veteran
30% AMI Units
Displaced-Other
Extremely Low-Income
Veteran

Rotary Bridgeway East

At least one household member must be eligible for Voluntary Supportive Services offered by the project.

Displaced-Other
Voluntary Supportive Services
Homeless
Veteran

Lorenzo Creek

At least one household member must be eligible for Voluntary Supportive Services offered by the project.

Displaced-Other
Voluntary Supportive Services
Homeless
Veteran

Magnolia Terrace

At least one household member must be a person with a disability in order to qualify. Note: This project’s funding for supportive services is targeted to serve persons with developmental disabilities.

Displaced-Emeryville
Displaced-Other
Voluntary Supportive Services
Veteran

Main Street Village
At least one household member must be eligible for Voluntary Supportive Services offered by the project and at least one household member must be homeless as defined in Preferences (above) for the Section 8 PBV program in order to qualify.

Homeless Units
- Displaced-Other
- Homeless
- Voluntary Supportive Services
- Veteran

Homeless and Disabled Units
In addition to the other requirements above for this project, at least one household member must be a person with a disability.
- Displaced-Other
- Homeless
- Voluntary Supportive Services
- Veteran

Maple Square
- Displaced-Other
- Veteran

MAYDEN MANOR
At least one household member must be age 62 or older or a person with a disability in order to qualify.
- Displaced-Other
- Veteran

Peppertree Village
- Displaced-Other
- Veteran

Station Center
- Displaced-Other
- Veteran

Third Street Apartments
At least one household member must be homeless as defined in Preferences (above) for the Section 8 PBV program in order to qualify.
Displaced-Other  
Homeless  
Veteran  

*Union City Units (58 Scattered)*  
Displaced-HACA  
Displaced-Other  
Veteran  

*Nidus Court*  
At least one household member must be age 62 or older to qualify.  
Displaced-HACA  
Displaced-Other  
Veteran  

*Dyer Street*  
At least one household member must be age 62 or older to qualify.  
Displaced-HACA  
Displaced-Other  
Veteran  

*Howard Collins Bridgeway*  
Displaced-Other  
Veteran  

*Eden Commons*  
At least one household member must be a person with a disability, as well as, a MediCal recipient who has resided in an institution for at least 90 days and is transitioning into the community.  
Displaced-Other  
CCT Participant  
Veteran  

*Flanders House*  
At least one household member must be a person with a disability, as well as, a MediCal recipient who has resided in an institution for at least 90 days and is transitioning into the community.  
Displaced-Other  
CCT Participant  
Veteran
Coordinated Entry Access Packet

Instructions: Fill out this access packet for ONE ADULT IN EACH HOUSEHOLD seeking services. If there are multiple adults in a household, choose one adult to complete the access packet as the head of household. The head of household should be the adult with the most barriers to obtaining and maintaining housing, such as the longest history of homelessness or greatest medical need. Or, each adult can access the housing crisis response system independently as separate households. It is up to the clients.

Ask each question as written, in order, and mark the response. Some questions include prompts or additional clarifications you can say if a question is unclear.

Notes and directions for staff appear in italics.
Questions and answer options for the client appear in regular type.

Notes and directions for data entry staff appear in shaded text boxes

The workflow through the access packet will depend on whether the household is literally homeless or not literally homeless. The workflows are as follows:

Not Literally Homeless Households
1. Safety Screening
2. Housing Crisis Screening
3. Housing Problem Solving
4. Referrals

Literally Homeless Households
1. Safety Screening
2. Housing Crisis Screening
3. Housing Problem Solving
4. Referrals
5. Option to complete the Assessment immediately or schedule an appointment with an HRC
6. Release of Information
7. Client Profile
8. Assessment

When complete, return the entire packet to the appropriate person at your agency for data entry and secure storage.

Introduction to Client Household: Hi! My name is FIRST NAME. Can you share your first name with me?

The Alameda County housing crisis response system is shifting to a new way of connecting people to available housing and support. Everything I’m going to ask will help with knowing what supports we may be able to offer. Some of the questions are personal. You don’t have to answer anything that makes you uncomfortable, but you should know that not answering questions may make it harder to connect you and your household with support.

For most people it takes 30 minutes to go through these questions. It’s best if we can get through them today, but we can come back to them later if needed. Answering the questions will also help us figure out some referrals to immediate support.

If it’s okay with you, let’s get started.
SAFETY SCREENING

1. Are you in immediate danger now or do you need immediate medical attention? No Yes (call 911)

2. Are you currently fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking? No Yes

2a. If No to 2, continue to the housing crisis screening.

2b. If Yes to 2 ask, Are you interested in services specifically for victims of domestic violence?
   • A domestic violence or sexual assault service provider can help you arrange a safe shelter and other specialized things you might need, like a safety plan.
   • The housing crisis response system can connect you with non-domestic violence related housing support.

Household choice:

☐ Victim of domestic violence interested in accessing services via a Domestic Violence Hotline.
   Connect the household to a DV hotline. Stop.
   o A Safe Place crisis line 510-536-7233
   o Building Futures with Women and Children 1-866-292-9688
   o Ruby's Place 888-339-7233
   o Tri-Valley Haven 1-800-884-8119
   o Next Door Solutions 408-279-2962
   o Family Violence Law Center Mobile Response Team 1-800-947-8301
   o National Domestic Violence Hotline 1-800-799-7233

☐ Victim of domestic violence interested in accessing services via the Housing Crisis Response System.
   Households that are actively fleeing a domestic violence situation are considered literally homeless. Skip the housing crisis screening. Proceed to housing problem solving.
HOUSING CRISIS SCREENING

3. What kind of place did you sleep or stay last night?
   - Homeless Situation, (LITERALLY HOMELESS) such as:
     - Place not meant for habitation like the street, outside, in a tent, in a car/van/RV, in an abandoned building, on a bus or BART, etc.
     - Emergency Shelter, including a hotel or motel paid for with an emergency shelter voucher
     - Interim Housing
     - Fleeing domestic violence
   - Institutional Housing Situation, such as:
     - Psychiatric hospital or other psychiatric facility
     - Substance abuse treatment facility or detox center
     - Hospital or other residential non-psychiatric medical facility
     - Jail, prison, or juvenile detention facility
     - Foster care home or foster care group home
     - Long term care facility or nursing home

   □ AND Has the household been staying in this kind of place less than 90 days?
   □ AND Was the household staying on the streets or in a shelter prior to this stay? (LITERALLY HOMELESS)

   □ Temporary Housing Situation, such as:
     - Hotel or motel paid for without emergency shelter voucher
     - Staying or living temporarily in a FRIEND’S or FAMILY MEMBER’s room, apartment, or house

   □ AND Has the household been staying in this kind of place less than 7 days?
   □ AND Was the household staying on the streets or in a shelter prior to this stay? (LITERALLY HOMELESS)

   □ Transitional and Permanent Housing Situations, such as:
     - Owned by client, no ongoing housing subsidy
     - Transitional housing for homeless (including homeless youth)
     - Residential project or halfway house with no homeless criteria.
     - Permanent housing (other than RRH) for formerly homeless persons*
     - Rental by client, with VASH subsidy*
     - Rental by client, with GPD TIP (transition-in-place) subsidy*
     - Rental by client with other housing subsidy (Including RRH) *
     - Owned by client, with ongoing housing subsidy
     - Rental by client, no ongoing subsidy
     - Living with friends or family on a permanent or long-term basis

   □ AND Has the household been staying in this kind of place less than 7 days?
   □ AND Was the household staying on the streets or in a shelter prior to this stay? (LITERALLY HOMELESS)

   □ Staff Use Only:
   Is the household literally homeless? ____ No _____ Yes

To be literally homeless the household must meet one of the below criteria:
  • Did the household stay in a homeless situation last night (see answer to question 3)?
  • Is the household exiting an institution where they have stayed for 90 days or less and did they reside in an emergency shelter or place not meant for human habitation immediately before entering that institution (all 3 Institutional Setting boxes)?

What is the final disposition of the housing crisis screening?
   □ Not literally homeless (continue to housing problem solving and referral)
   □ Literally homeless (continue to housing problem solving, referral, and assessment)
HOUSING PROBLEM SOLVING

What is happening with your housing situation?

Engage in active listening. Repeat and reflect back what is being said to clarify and ensure understanding.

Possible exploratory questions:
- What have you already tried to help with this situation?
- Who is in your support system? Could these people help you resolve your housing situation and what would it take?
- Do you have a social worker, advocate, case manager, or someone else who is working with you? Do they know about what's happening?

What do you think would help to resolve your housing crisis?

Based on what you've said, would information about [affordable housing, eviction prevention, legal, financial assistance, relocation, etc.] resources would helpful? Check all referrals provided

Information About Affordable Housing

- Bay Area Community Services Housing Education and Counseling Workshops: M-F around Alameda County, call 510-613-0330 for more information or visit bayareacs.org
- Eden I&R's affordable housing list: call 2-1-1
- AIDS Housing Information Project, M-F 9am-4pm through 510-537-2600 or 877-424-3746

Eviction Prevention

- Bay Area Legal Aid's Tenant Rights Line: leave a message at 1-888-382-3405
- Catholic Charities Housing Clinics, 2nd and 4th Tuesday of the month from 9-11:30AM @ 433 Jefferson St. in Oakland, call 510-768-3100 for more information
- Causa Justa/Just Cause: 510-TENANTS/ 510-836-2687 @ 3022 International Blvd Suite 205, Oakland
- Centro Legal de la Raza: 510-437-1554 or visit centrolegal.org
- East Bay Community Law Center: 510-548-4040 or visit info@ebclc.org
- ECHO Housing: 510-581-9380 or toll free 855-ASK-ECHO
- Eviction Defense Center: (510) 452-4541 or visit www.evictiondefensecenteroakland.org
- Tenants Together Tenant Rights Hotline: 1-888-495-8020

Financial Assistance

- Catholic Charities Housing and Financial Services Center: 510-768-3100 @ 433 Jefferson St, Oakland
- ECHO Housing: 510-581-9380 or toll free 855-ASK-ECHO
- Eden I&R: call 2-1-1
- Neighborhood Law Corps: 510-238-6628 (utility shut-off help)
- Season of Sharing: 510-272-3700
- Utility Assistance, REACH: 1-800-933-9677 or HEAP: 510-881-0300

Legal (including, but not limited to, clean slate and credit repair services)

- Bay Area Legal Aid's Legal Advice Line: 1-800-551-5554
- East Bay Community Law Center: 510-548-4040 or info@ebclc.org
- Housing and Economic Rights Advocates (HERA): 510-271-8443
- Neighborhood Law Corps: 510-238-6628

Information and Referral to Other Services:

- Eden I&R information and referral service: call 2-1-1

Veteran Specific Services

- VA Homeless Triage 510-453-8478; M-F 8am-4pm @ 525 21st St Oakland (shower, laundry, referrals, connections to VA housing)
- Swords to Plowshares 510-844-7500 @ 2719 Telegraph Ave, Oakland (legal, employment, housing, prevention assistance)
- VA Drop-In Housing Resource Group Wednesday 11:30am-12:30pm @ 39199 Liberty St. Fremont
- VA Drop-In Housing Resource Group Mon 10am-11am @ 4951 Arroyo Rd, Bldg. 62 Room 505, Livermore

Other:

Stop for Not Literally Homeless households.
Coordinated Entry Access Packet: Screening and Housing Problem Solving

Literally Homeless Households:

There may be additional housing and support resources (like shelter, transitional housing, or housing navigation) available to you. Alameda County is using an assessment to prioritize and match people to resources as they become available. Would you like to do the assessment now? Or, I can help you connect with a housing resource center, and they can do the assessment.

Assigning a Resource Zone:
In what part of the Bay Area do you spend most of your time? Or, what city do you identify as “home?”

<table>
<thead>
<tr>
<th>Alameda = Mid County</th>
<th>Emeryville = North County Adults or North County Families</th>
<th>Piedmont = Oakland Adults or North County Families</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albany = North County Adults or North County Families</td>
<td>Fremont = South County</td>
<td>Pleasanton = East County</td>
</tr>
<tr>
<td>Berkeley = North County Adults or North County Families</td>
<td>Hayward = Mid-County</td>
<td>San Leandro = Mid-County</td>
</tr>
<tr>
<td>Castro Valley = Mid County</td>
<td>Livermore = East County</td>
<td>San Lorenzo = Mid-County</td>
</tr>
<tr>
<td>Dublin = East County</td>
<td>Newark = South County</td>
<td>Sunol = South County</td>
</tr>
<tr>
<td></td>
<td>Oakland = Oakland Adults or North County Families</td>
<td>Union City = South County</td>
</tr>
</tbody>
</table>

How are you/your household connected there?
- Family
- Job
- School
- Sleep/stay
- Support service programs
- Support system
- Other: ____________________________

Based on where you usually stay, it sounds like you should be connected with and HRC in [insert appropriate resource zone]. Your HRC is [Use following list of HRCs by resource zone to assign an HRC. When there are multiple HRCs in a zone, the client can choose the HRC that they’d prefer to access.]

For households wishing to schedule an appointment with the HRC: Call the HRC with the household and schedule the appointment together, provide HRC contact information to the household so they can remain in touch (reverse of this page). If they lose the contact info or can’t remember, the household can call 211. Stop.

For households wishing to do the assessment now, assign the HRC and provide contact information to the household so that they can remain in touch (reverse of this page). If they lose the contact info or can’t remember, the household can call 211. Proceed to the ROI.
Coordinated Entry Access Packet: Screening and Housing Problem Solving

East County:
- Abode Services Tri-Valley Housing Resource Center (all households)
  - Call 2-1-1

Oakland
- Bay Area Community Services (BACS) Downtown Oakland Housing Resource Center (adults)
  - Call 2-1-1
  - Walk in hours M-W 12-3 @ 559 16th St. Oakland, CA 94612
- East Oakland Community Project (EOCP) East Oakland Housing Resource Center (adults)
  - Call 2-1-1
  - Walk in ours Th and F 12-3 @ 7515 International Blvd, Oakland CA 94621
- Family Front Door (families)
  - Call 2-1-1

North County
- Berkeley Food and Housing North County Housing Resource Center (adults)
  - Call 2-1-1
- Family Front Door (families)
  - Call 2-1-1

Mid County
- Abode Services Mid County East Housing Resource Center (all households)
  - Call 2-1-1
- Building Futures with Women and Children (BFWC), Mid County West Housing Resource Center (all households)
  - Call 2-1-1

South County
- Abode Services Tri-City Housing Resource Center (all households)
  - Call 2-1-1
What is InHOUSE and Why Should I Use It?

InHOUSE is a database system used to
• Coordinate efforts to help you obtain and maintain permanent housing
• Secure files electronically
• Ensure these projects continue receiving funding to keep them open
• Reduce the information you have to repeat and answer at multiple agencies

The InHOUSE system is used by many agencies throughout the county that provide services to homeless and low-income persons. A current list of participating health, housing, and human service agencies that provide housing-related supports is available at (acgov.org/cda/hcd/documents/roi_providers.pdf). InHOUSE data is used to assess your needs, track and improve services provided, and to match you to helpful resources based on priorities and standards established by the Alameda County HUD Continuum of Care (viewable at everyonehome.org).

When you request or receive services from a program participating in the Alameda County Continuum of Care, information collected about your household is entered into the InHOUSE system.

What information is shared about me?

My name, social security number, alias, date of birth, gender, race, ethnicity, veteran status, education, employment, if I have a disability, household relationships, living situation, income amount(s) and type, benefit(s) information, if I have health coverage and type, assessments, services needed and provided, and outcomes of services provided, including the name of the projects where I received services. Other information that might be collected (dependent on program) include income, non-cash benefits, health insurance, physical disability, developmental disability, chronic health condition, HIV/AIDS status, mental health, substance abuse, domestic violence, sexual orientation, etc. Additional information may include sharing of my photo and previously collected InHOUSE data.
Who can view and share information about me?

Information shared about me will ONLY be viewable by the participating agencies listed at (acgov.org/cda/hcd/documents/roi_providers.pdf). Each person or agency with access rights to the InHOUSE system must sign an agreement to maintain the security and confidentiality of client records.

Funders, cities, and other housing-related planning groups require InHOUSE to provide reports, which enable them to better understand the people-served, services provided and outcomes achieved. InHOUSE helps by pooling your data with others for these reports. This supports continued funding and improvement of services and housing projects for you and other homeless and low-income households. In addition, InHOUSE data is used for research purposes (including coordination with other systems of care), analysis about programs, specific service types, targeting of services, understanding best practices and improvements needed, or other uses to enhance the homeless and housing service delivery system. Keeping your information within the InHOUSE system helps us pool your data with others for these reports.

You have the right to receive a copy of all information collected about you and shared between the participating agencies. You may also amend and correct information collected about you that may be incorrect.
Client Name (Print): ____________________________________________

Accompanying children: _________________________________________
(under the age of 18)

___________________________________________________________

(Initial Here)

I have received and reviewed the “What is InHOUSE and Why Should I Use It” information sheet.

Consent to share and view my data:

By signing below, I agree that program intake/exit and service information collected about me and my household can be shared among InHOUSE participating agencies for the purposes of helping me to obtain and maintain permanent housing.

- I understand that a regularly updated list of the agencies participating in InHOUSE is available at (acgov.org/cda/hcd/documents/roi_providers.pdf).
- I know that the agencies participating in the system (listed at acgov.org/cda/hcd/documents/roi_providers.pdf) must follow strict privacy laws regarding protection of electronic and paper records.
- I understand that this acknowledgement is valid for ten (10) years from the date that I sign this form.
- I understand that my name, date of birth, gender and Social Security Number are used to identify my record in the database.
- I understand that my photo may be shared in the system.
- I understand that my services and project data will be used in reporting and in research or analysis about programs, specific service types, targeting of services, or other uses to improve the homeless and housing service delivery system.

_________________________       _____________  
Signature of Client             Date

_________________________       _____________
Agency Representative         Date

______________________________
Agency Representative Printed Name
RELEASE OF INFORMATION (ROI)

Client received data privacy and security notice and opted into the HMIS by signing the Release of Information.

Start Date: Reference the ROI form for start date
End Date: 10 years after start date
Documentation Type:
Location: With what agency is the signed document on file?

Keep the signed ROI with this form. Continue to the client profile.

Client declined to share information and did not sign Release of Information (ROI). STOP. Be sure to complete housing problem solving, provide referrals, and reiterate that the household can reach out to 211 to get assessed at a later date.

CLIENT PROFILE

What is your Social Security Number? __ __ ___ - ___ ___ ___ ___

☐ Full SSN Reported ☐ Approximate or Partial SSN Reported ☐ Client Doesn’t Know ☐ Client Refused

What is your full name?
First: ___________________________ Middle: ___________________________ Last: ___________________________
Suffix: ___________________________ Alias: ___________________________

☐ Full Name Reported ☐ Partial, Street, or Code Name ☐ Client Doesn’t Know ☐ Client Refused

What is your Date of Birth? ___ / ___ / ___ ___

☐ Full DOB Reported ☐ Approximate or Partial DOB Reported ☐ Client Doesn’t Know ☐ Client Refused

How do you describe or identify your gender?

☐ Female ☐ Trans Female (MTF or Male to Female)
☐ Male ☐ Trans Male (FTM or Female to Male)

☐ Gender Non-Conforming (doesn’t identify as female, male, or transgender) ☐ Client Doesn’t Know ☐ Client Refused

How do you describe or identify your sexual orientation?

☐ Heterosexual/Straight ☐ Lesbian ☐ Bisexual
☐ Gay ☐ Questioning/unsure ☐ Client Doesn’t Know ☐ Client Refused

What race do you identify with? You can identify more than one. Please select all that apply:

☐ American Indian or Alaskan Native ☐ Asian ☐ Black or African American
☐ Native Hawaiian or Other Pacific Islander ☐ White ☐ Client Doesn’t Know ☐ Client Refused

What is your ethnicity? Do you identify as Hispanic or Latino?

☐ Hispanic/Latino ☐ Non-Hispanic/Non-Latino ☐ Client Doesn’t Know ☐ Client Refused

Have you served on, or completed a call to, active duty in the Armed Forces of the United States?

☐ Yes ☐ No (skip additional veteran questions) ☐ Client Doesn’t Know (skip additional veteran questions) ☐ Client Refused (skip additional veteran questions)
If yes, a veteran: There are some resources that are only for veterans, so I have a few additional questions to help determine if you may be eligible for these veteran resources.

- What year did you enter military service? ________________________________
- What year did you leave military service? ______________________________
- In what theater of Operations did you serve?
  - World War II
  - Korean War
  - Vietnam War
  - Persian Gulf War
  - Afghanistan
  - Iraq (Iraqi Freedom)
  - Iraq (New Dawn)
  - Other Operations
  - Client Doesn’t Know
  - Client Refused
- In what branch of the military did you serve?
  - Army
  - Air Force
  - Navy
  - Marines
  - Coast Guard
  - Client Doesn’t Know
  - Client Refused
- What is your discharge status?
  - Honorable
  - General under honorable conditions
  - Other Than Honorable (OTH)
  - Bad Conduct
  - Dishonorable
  - Uncharacterized
  - Client Doesn’t Know
  - Client Refused

Where was the last permanent housing where you lived for 90 days or more?
- Alameda
- Albany
- Berkeley
- Castro Valley
- Dublin
- Emeryville
- Fremont
- Hayward
- Livermore
- Newark
- Oakland
- Piedmont
- Pleasanton
- San Leandro
- San Lorenzo
- Sunol
- Union City
- Other Unincorporated Alameda County
- Contra Costa County
- Marin County
- San Francisco
- San Mateo County
- Santa Clara County
- Another California County
- Another State
- Another Country

Where did you go to high school (if applicable)?
- Alameda
- Albany
- Berkeley
- Castro Valley
- Dublin
- Emeryville
- Fremont
- Hayward
- Livermore
- Newark
- Oakland
- Piedmont
- Pleasanton
- San Leandro
- San Lorenzo
- Sunol
- Union City
- Other Unincorporated Alameda County
- Contra Costa County
- Marin County
- San Francisco
- San Mateo County
- Santa Clara County
- Another California County
- Another State
- Another Country

Where were you born?
- Alameda
- Albany
- Berkeley
- Castro Valley
- Dublin
- Emeryville
- Fremont
- Hayward
- Livermore
- Newark
- Oakland
- Piedmont
- Pleasanton
- San Leandro
- San Lorenzo
- Sunol
- Union City
- Other Unincorporated Alameda County
- Contra Costa County
- Marin County
- San Francisco
- San Mateo County
- Santa Clara County
- Another California County
- Another State
- Another County
Coordinated Entry Access Packet: Release of Information and Client Profile

What is/are the best way(s) to contact you? Prompt: We want to be able to reach you when something useful becomes available for you.

Do you have a physical address? Prompt: where do you sleep or spend your time?
☐ Yes. Provide physical address below ☐ No. Move on to mailing address

<table>
<thead>
<tr>
<th>Physical Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street/Apartment</td>
</tr>
<tr>
<td>City</td>
</tr>
<tr>
<td>State</td>
</tr>
<tr>
<td>ZipCode</td>
</tr>
</tbody>
</table>

Do you have a mailing address?
☐ Yes ☐ No. Move on to phone information

<table>
<thead>
<tr>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, is your mailing address the same as the physical address?</td>
</tr>
<tr>
<td>☐ Yes. Move on to phone information ☐ No. Provide mailing address below</td>
</tr>
<tr>
<td>Street/Apartment</td>
</tr>
<tr>
<td>City</td>
</tr>
<tr>
<td>State</td>
</tr>
<tr>
<td>ZipCode</td>
</tr>
</tbody>
</table>

Phone, Primary:

Phone, Alternate:

Email, Primary:

Email, Alternate:

Notes:

(End of Client Profile)
Coordinated Entry Access Packet: Assessment

Date: ___ / ___ / ___  Staff Name: ________________________________

Agency: ________________________________

Setting: □ Housing Education Workshop  □ HRC Walk-in  □ Outreach  □ Other in Person Setting

Please assign the resource zone by referencing the household configuration (Adults only or Families with minor children) and where the household spends most of their time. Answer the below question by referencing the housing crisis screening on page 5 or verbally verifying with the head of household.

In what part of the Bay Area do you spend most of your time? Or, what city do you identify as “home?”

| □ Alameda = Mid County | □ Emeryville = North County Adults or North County Families | □ Piedmont = Oakland Adults or North County Families |
| □ Albany = North County Adults or North County Families | □ Fremont = South County | □ Pleasanton = East County |
| □ Berkeley = North County Adults or North County Families | □ Hayward = Mid-County | □ San Leandro = Mid-County |
| □ Castro Valley = Mid County | □ Livermore = East County | □ San Lorenzo = Mid-County |
| □ Dublin = East County | □ Newark = South County | □ Sunol = South County |
| | □ Oakland = Oakland Adults or North County Families | □ Union City = South County |

Zone Assignment: □ North County Adults (Adults from Albany, Berkeley, Emeryville)

□ Oakland Adults (Adults from Oakland, Piedmont)

□ North County Families (Families with minor children from Albany, Berkeley, Emeryville, Oakland, Piedmont)

□ Mid County Adults and Families (All households from Alameda, Ashland, Castro Valley, Cherryland, Hayward, San Leandro, San Lorenzo)

□ East County Adults and Families (All households from Dublin, Livermore, Pleasanton, and surrounding unincorporated areas)

□ South County Adults and Families (All households from Fremont, Newark, Sunol, Union City, and surrounding unincorporated areas)
Living Situation
What kind of place did you sleep or stay last night?

☐ Homeless Situation, such as:
  - Place not meant for habitation like the street, outside, in a tent, in a car/van/RV, in an abandoned building, on a bus or BART, etc.
  - Emergency Shelter, including a hotel or motel paid for with an emergency shelter voucher
  - Interim Housing
  - Fleeing domestic violence

☐ Institutional Housing Situation, such as:
  - Psychiatric hospital or other psychiatric facility
  - Substance abuse treatment facility or detox center
  - Hospital or other residential non-psychiatric medical facility
  - Jail, prison, or juvenile detention facility
  - Foster care home or foster care group home
  - Long term care facility or nursing home

☐ And, has the household been staying in this kind of place less than 90 days?
☐ And, was the household staying on the streets or in a shelter prior to this stay?

☐ Temporary Housing Situation, such as:
  - Hotel or motel paid for without emergency shelter voucher
  - Staying or living temporarily in a FRIEND’S or FAMILY MEMBER’S room, apartment, or house

☐ And, has the household been living in this kind of place for less than 7 days?
☐ And, was the household staying on the streets or in a shelter prior to this stay?

☐ Permanent Housing Situation, such as:
  - Owned by client, no ongoing housing subsidy
  - Residential project or halfway house with no homeless criteria.
  - Transitional housing for homeless (including homeless youth)
  - Permanent housing (other than RRH) for formerly homeless persons*
  - Rental by client, with VASH subsidy*
  - Rental by client, with GPD TIP (transition-in-place) subsidy*
  - Rental by client with other housing subsidy (Including RRH) *
  - Owned by client, with ongoing housing subsidy
  - Rental by client, no ongoing subsidy
  - Living with friends or family

☐ And, has the household been living in this kind of place for less than 7 days?
☐ And, was the household staying on the streets or in a shelter prior to this stay?

How long have you been sleeping or staying in this kind of place (i.e. the emergency shelter or place not meant for human habitation listed directly above)?

<table>
<thead>
<tr>
<th>One night or less</th>
<th>Two to six nights</th>
<th>One week or more, but less than one month</th>
<th>One month or more, but less than 90 days</th>
</tr>
</thead>
<tbody>
<tr>
<td>90 days or more, but less than one year</td>
<td>One year or more, but less than 2 years</td>
<td>Two years or more, but less than 5 years</td>
<td>Five years or more, but less than 10 years</td>
</tr>
<tr>
<td>Ten years or more</td>
<td>Client Doesn’t Know</td>
<td>Client Refused</td>
<td></td>
</tr>
</tbody>
</table>

Approximate date homelessness started: When did you become homeless this time? When did you start staying in a shelter or a place not meant for people to sleep? If not previously homeless but will be tonight, use today’s date. Approximate date is okay.

____ / ____ / ______
Times Homeless in the Past Three Years: Over the past three years, how many separate times have you been homeless in an Emergency Shelter or a place not meant for people to sleep, including today?

☐ One time  ☐ Two times  ☐ Three times  ☐ Four or more times  ☐ Client Doesn’t Know  ☐ Client Refused

Total Months Homeless in the Past Three Years: Over the past three years, what is the total number of months you have been homeless in an Emergency Shelter, on the street, in a vehicle, or in another place not meant for people to sleep, including today?

☐ One month (this time is first month)  ☐ 2 months  ☐ 3 months  ☐ 4 months  ☐ 5 months  ☐ 6 months  ☐ 7 months

☐ 8 months  ☐ 9 months  ☐ 10 months  ☐ 11 months  ☐ 12 months  ☐ More than 12 months  ☐ Client Refused  ☐ Client Doesn’t Know

Over your whole life, how long have you lived in an emergency shelter or place not meant for people to sleep?

☐ One night or less  ☐ Two to six nights  ☐ One week or more, but less than one month  ☐ Between 30 and 90 days

☐ 90 days or more, but less than one year  ☐ One year or more, but less than 2 years  ☐ Two years or more, but less than 5 years  ☐ Five years or more, but less than 10 years

☐ Ten years or more  ☐ Client Doesn’t Know  ☐ Client Refused

When was the last time you or any adult in your household had a lease on an apartment (or owned a property) that was in your name? Answer this question for the adult who had a lease the longest time ago.

☐ Now/Currently  ☐ One year ago, or less  ☐ 1 to 5 years ago  ☐ More than 5 years ago  ☐ Never

Have you or any adult in your household left housing due to a legal eviction or foreclosure notice in the last 5 years? I’m talking about a situation in which you/they were legally forced to leave by a court order. Answer this question for the adult with the most legal evictions/foreclosures in the past 5 years.

☐ 0 / Never  ☐ 1 to 2 times  ☐ 3 or more times

Continued on next page.
**Household Information**
Please indicate the total number of persons in your household for whom you are seeing assistance for right now. By household, I mean the people you are planning to live with and are seeking assistance for right now. ________

Please list the **names** and **date of birth** of all household members and their **relationship** to you.

<table>
<thead>
<tr>
<th>Name</th>
<th>Date of Birth/ Age</th>
<th>Relationship (Spouse, child, etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**True for any of the household members, including the head of household**
- [ ] Age 2 years or younger
- [ ] Age 3-5 years
- [ ] Age 62 or older
- [ ] Head of Household age 18-24 years

**Pregnancy Status:** Are you or anyone in your household currently pregnant?
- [ ] Yes
- [ ] No
- [ ] Client Doesn’t Know
- [ ] Client Refused

**Formerly a Ward of Child Welfare or Foster Care Agency:** Have you or anyone in your household aged out of foster care?
- [ ] Yes
- [ ] No
- [ ] Client Doesn’t Know
- [ ] Client Refused

**Housing Barriers**
These next questions are things a property manager might ask about or find out about as they consider you for housing. Please answer these questions as honestly as you can. Having these kinds of things in your past will not prevent you from getting assistance from us and knowing about them will help us work with you to address these housing challenges.

In the past five years, have you or another adult in your household been arrested by the police?
**Answer this question for the adult with the most arrests in the past five years.**
- [ ] 0 / Never
- [ ] 1 to 3 times
- [ ] 4 or more times

Have you or another adult in your household ever been convicted of any of the following offenses? *(May select more than one)*

<table>
<thead>
<tr>
<th>Arson</th>
<th>Methamphetamine production</th>
<th>A sexual offense that requires you to register with law enforcement</th>
<th>A crime that led to an eviction or loss of your housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ] Yes</td>
<td>[ ] Yes</td>
<td>[ ] Yes</td>
<td>[ ] Yes</td>
</tr>
<tr>
<td>[ ] No</td>
<td>[ ] No</td>
<td>[ ] No</td>
<td>[ ] No</td>
</tr>
<tr>
<td>[ ] Client Doesn’t Know</td>
<td>[ ] Client Doesn’t Know</td>
<td>[ ] Client Doesn’t Know</td>
<td>[ ] Client Refused</td>
</tr>
</tbody>
</table>
Income and Benefits
What is your household’s monthly income? 

Use the annualized household income to identify the corresponding Area Median Income (AMI)

Health Information
How many times have you or any other adult in your household been hospitalized or used health care crisis services (like an emergency room, ambulance, psychiatric emergency services, suicide prevention hotline, detox program) in the past 30 days? Answer this question for the adult with the most hospitalizations/highest use of health care crisis services.

| □ 0 / None | □ 1 time | □ 2 times | □ 3-5 times | □ 6 or more times |
| Client Doesn’t Know | □ Client Refused |

Do any of the following specific conditions apply to you? Mark all that apply.

- □ Physical disability
- □ Chronic health condition(s) such as, but not limited to, heart disease, severe asthma, diabetes, traumatic brain injury, post-traumatic stress syndrome, dementia, severe headache/migraine, cancer, chronic bronchitis, etc.
- □ Psychiatric/Mental health conditions such as depression or schizophrenia
- □ Excessive use or dependency on alcohol
- □ Use of illegal drugs or prescriptions not written for them
- □ Both alcohol and drugs
- □ Developmental disability
- □ HIV/AIDS

Do any of the following specific conditions apply to any other household members? Mark all that apply.

<table>
<thead>
<tr>
<th>Household Member’s Name</th>
<th>Condition (check all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Physical Disability</td>
<td></td>
</tr>
<tr>
<td>□ Chronic health condition(s)</td>
<td></td>
</tr>
<tr>
<td>□ Psychiatric/Mental Health such as depression or schizophrenia</td>
<td></td>
</tr>
<tr>
<td>□ Excessive use or dependency on alcohol</td>
<td></td>
</tr>
<tr>
<td>□ Use of illegal drugs or prescriptions not written for them</td>
<td></td>
</tr>
<tr>
<td>□ Both alcohol and drugs</td>
<td></td>
</tr>
<tr>
<td>□ Developmental Disability</td>
<td></td>
</tr>
<tr>
<td>□ HIV/AIDS</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Household Member’s Name</th>
<th>Condition (check all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Physical Disability</td>
<td></td>
</tr>
<tr>
<td>□ Chronic health condition(s)</td>
<td></td>
</tr>
<tr>
<td>□ Psychiatric/Mental Health such as depression or schizophrenia</td>
<td></td>
</tr>
<tr>
<td>□ Excessive use or dependency on alcohol</td>
<td></td>
</tr>
<tr>
<td>□ Use of illegal drugs or prescriptions not written for them</td>
<td></td>
</tr>
<tr>
<td>□ Both alcohol and drugs</td>
<td></td>
</tr>
<tr>
<td>□ Developmental Disability</td>
<td></td>
</tr>
<tr>
<td>□ HIV/AIDS</td>
<td></td>
</tr>
</tbody>
</table>
When you last had any type of housing, have you or another adult in your household experienced difficulties with things like shopping, preparing food, using public or other forms of transportation, taking medications, or handling your money and paying bills?

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

Have you or anyone in your household been told by a medical provider that you have a life-threatening illness that requires you to have stable shelter before you can obtain the treatment you need? For example, people that need oxygen, chemotherapy/radiation treatment, regular insulin injections, organ transplants, etc.

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

**Violence and Risk**
We are almost done. These next questions are about things that have happened to you or members of your household.

In the past 30 days, have you or another member of your household had to do things that felt unsafe to survive?

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

If yes, how frequently did you or another member of your household do things that felt unsafe to survive?

☐ 0 / None  ☐ Daily  ☐ Once a week  ☐ Two or three times a month

☐ Once  ☐ Client Doesn’t Know  ☐ Client Refused

Have you or any other adult in your household ever become homeless because you ran away from your family home, a group home, or a foster home?

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

**Current Resources Assessment**
Currently, do you and/or members of your household receive any of the below? Check the resources the household currently receives. Would you be interested in seeing if you qualify for these types of income and support?

Income Sources:

☐ Earned income (i.e. employment, job
☐ Supplemental Security Income (SS)
☐ Retirement Income from Social Security
☐ VA Non-Service Connected Disability Pension
☐ VA Service Connected Disability Pension
☐ Temporary Assistance for Needy Families (TANF)
☐ Private disability insurance
☐ Child Support
☐ Unemployment Insurance
☐ Social Security Disability Insurance (SSDI)
☐ Workers Compensation
☐ General Assistance
☐ Pension/Retirement income from a former job
☐ Alimony or other spousal support
☐ Other
(resource assessment continues, next page)

Non-Cash Benefits:
- [ ] Supplemental Nutrition Assistance Program (SNAP), CalFresh, Food Stamps, EBT
- [ ] TANF Child Care Services
- [ ] TANF Transportation Services
- [ ] Special Supplemental Nutrition Assistance Program for Women, infants, and Children (WIC)
- [ ] Other TANF Services
- [ ] Other

Health Insurance:
- [ ] MEDICAID/MediCal
- [ ] MEDICARE
- [ ] State Children’s Health Insurance (SCHIP)
- [ ] VA Medical Services
- [ ] Employer-Provided Health Insurance
- [ ] Health Insurance obtained through COBRA
- [ ] Private Pay Health Insurance
- [ ] State Health Insurance for Adults
- [ ] Indian Health Services Program
- [ ] Other:

Let’s think together about the personal strengths, connections, and positive supports that you have in your life, and how they could help you get back into permanent housing with support from our program or other programs.

We have completed the coordinated entry assessment. Let’s talk now about staying in touch and next steps.

As you know there are very few affordable housing resources available and many people in need. I do not know at this point if your household will be prioritized for housing support, or when support may become available. If you are matched to housing support, you will be contacted using the information you provided. Please stay in touch and let us know if anything changes in your life, either positive or negative, that may impact your housing situation. Here is the contact information for:

HRC: __________________________

Outreach Worker: __________________________

Before we go, are there any other resources or services I can connect you to?
STAFF USE ONLY

Referrals Provided (Check ALL that APPLY)

☐ Community Mental Health

☐ Employment Assistance

☐ Health Insurance

☐ Identification Documents

☐ Income Assistance

☐ Non-Cash Benefits (Cal-Fresh, Cal-Works Childcare, Cal-Works Transportation, WIC, etc.)

☐ Primary Health/Dental Care

☐ Substance Use Treatment

☐ Applicant declined referral/acceptance.

☐ Applicant terminated assessment prior to completion.

☐ Other/Specify:__________________________________________________________
<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Project Cover Sheet = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>1.b Primary Activity type = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>□ Existing Permanent Housing (PSH &amp; RRH) and Youth-Serving TH = 5 Points</td>
<td></td>
</tr>
<tr>
<td>□ General use (non-youth serving) Transitional Housing = 3 Points</td>
<td></td>
</tr>
<tr>
<td><strong>2</strong> Project addresses Local and HUD Priorities = 16 Points maximum</td>
<td></td>
</tr>
<tr>
<td>2.a Target populations and severity of need = (up to 10 points)</td>
<td></td>
</tr>
<tr>
<td>Check any boxes that are true and can be verified by back up documentation. Project will receive the score from the highest single point value that can be verified, section is not cumulative.</td>
<td></td>
</tr>
<tr>
<td>□ Provides PSH to 100% of chronically homeless households as evidenced by EveryOne Home HUD CoC APR tool = 10 Points</td>
<td></td>
</tr>
<tr>
<td>□ Existing PSH which became DedicatedPLUS in 2017 = 9 Points</td>
<td></td>
</tr>
<tr>
<td>□ Provides PSH and fills 100% of turnover with chronically homeless households as evidenced by EveryOne Home HUD Target Population Report tool = 8 Points</td>
<td></td>
</tr>
<tr>
<td>□ Provides Rapid Rehousing to families, individuals and/or transition aged youth as evidenced by APR = 8 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = 6 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = 3 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = 6 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = 3 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of heads of households entered project from the streets or other places not meant for human habitation = 8 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of heads of households entered project from the streets or other places not meant for human habitation = 4 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of heads of households are fleeing domestic violence and/or human trafficking = 6 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of heads of households are fleeing domestic violence and/or human trafficking = 3 Points</td>
<td></td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>-------------</td>
</tr>
<tr>
<td>2.b</td>
<td>Housing First and Low Barrier documentation</td>
</tr>
<tr>
<td>3</td>
<td>Outcome Performance = 32 Points maximum</td>
</tr>
<tr>
<td>3.a APR Performance Outcomes A-D</td>
<td>32 Points maximum</td>
</tr>
<tr>
<td>4</td>
<td>Grant Management = up to 20 Points maximum</td>
</tr>
<tr>
<td>4.a</td>
<td>Reports and Invoicing = 10 points maximum</td>
</tr>
<tr>
<td>4.b</td>
<td>Capacity and Utilization = 5 points maximum</td>
</tr>
<tr>
<td>4.c</td>
<td>Client Eligibility = 5 points maximum</td>
</tr>
<tr>
<td>5</td>
<td>Organizational Capacity = 6 points maximum for entire section</td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>5.a HMIS Data Completeness Report Card = 2 Points maximum</td>
<td>☐ Exiting project’s data quality score is greater than or equal to 95%, as evidenced by the EveryOne Home HUD CoC APR Tool = 2 Points  ☐ Greater than or equal to 90% and below 95%, as evidenced by the EveryOne Home HUD CoC APR Tool = 1 Point  ☐ Below 90%, as evidenced by the EveryOne Home HUD CoC APR Tool = 0 Points</td>
</tr>
<tr>
<td>5.b Fiscal Management = 4 points maximum</td>
<td>☐ Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2016, that shows no findings or areas of concern in the management letter. = 4 Points  ☐ Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2015, that does show findings or areas of concern in the management letter. = 0 Points</td>
</tr>
</tbody>
</table>

**Local Application Criterion – Renewal Projects**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>
| 1 | Project Evaluation of Objective Criteria Preliminary scores (Up to 79 points)  
*Note: Preliminary Project Evaluation scoring for Renewals is cumulative with Local Application scores* |
| 2 | Narrative for Housing First (up to 4 points)  
*Note: Points will be cumulative for this section when combined with the Project Evaluation Package’s HF Objective Criteria preliminary scores.* |
| 5 | Narrative for Community Engagement – Not Scored in 2018. |
| 6 | Narrative(s) for Performance Outcomes A-D (low scoring projects only) |
| 7 | Spending (criteria to be determined) (5 points) |
| 8 | Cost Effectiveness (criteria to be determined by workgroup) (5 points) |
| 9 | Narrative for Client Eligibility (low scoring projects only) |
| 10 | Narrative for Fiscal Management (low scoring projects only) |
| 11 | Narrative for Quality Assurance (up to 7 points) |

**Total Local Application Points Possible:** 21  
**Total Project Evaluation Points Possible:** 79  
*Note: Local Application scoring for Renewals is cumulative with preliminary Project Evaluation scores*  
**Total Points Possible:** 100
<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Project addresses Local and HUD Priorities = up to 6 Points</td>
<td>Housing First Narrative Questions = up to 4 Points as determined by application scorers following Housing First Checklist (Principles: low barrier and no preconditions to entry; voluntary services and prioritizing engagement and problem-solving over therapeutic goals; and rapid placement and stabilization in permanent housing).</td>
</tr>
<tr>
<td>1.a Housing First narrative = 4 Points as determined by application scorers.</td>
<td></td>
</tr>
<tr>
<td>Points will be cumulative up to 10 points for this section when combined with the Project Evaluation Package:</td>
<td></td>
</tr>
<tr>
<td>1.b Cost Effectiveness = 2 points</td>
<td>Projects 100% dedicated to chronically homeless since inception or currently serving at least 50% chronically homeless adults. Average cost per outcome is 60% or less above average for comparable projects in package = 2 Points.</td>
</tr>
<tr>
<td></td>
<td>Project's average cost per outcome is 25% or less above average of comparable projects in package = 2 Points.</td>
</tr>
<tr>
<td></td>
<td>Project's average annual cost per outcome is 26% or more above average of comparable projects in package = 0 Points.</td>
</tr>
<tr>
<td>2. Grant Management = up to 5 Points</td>
<td></td>
</tr>
<tr>
<td>2.a Spending = 5 Points maximum</td>
<td>Existing project spent 100-95% of funds in the last grant year = 5 Points.</td>
</tr>
<tr>
<td></td>
<td>Existing project spent 94% or less of funds in the last grant year and provided a reasonable explanation (as determined by application scorers) = up to 3 Points.</td>
</tr>
<tr>
<td></td>
<td>Existing project spent 94% or less of funds in the last grant year = 0 Points.</td>
</tr>
<tr>
<td>3. Organizational Capacity = up to 7 points</td>
<td></td>
</tr>
<tr>
<td>3.a Quality Assurance = 7 Points as determined by application scorers.</td>
<td>Existing project will be scored a maximum of 7 points for their Quality Assurance narrative as determined by application scorers.</td>
</tr>
<tr>
<td>4. Consolidation = 3 points</td>
<td>Project is applying to consolidate programs = 3 points.</td>
</tr>
</tbody>
</table>
1. Permanent Supportive Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Retains and/or exits to other Permanent Housing &gt; 12 months</td>
<td>95%</td>
</tr>
</tbody>
</table>
|         | □ Meets or exceeds local benchmark in an existing project = **10 Points**  
□ Is within 5 percentage points of the local benchmark in existing project = **8 Points**  
□ Is within 10 percentage points of the local benchmark within an existing project = **4 Points**  
□ Is > 10 percentage points below the local benchmark = **0 Points** |
| B       | Adults who maintain or increase income | 50% of leavers and stayers |
|         | □ Meets or exceeds local benchmark in existing project = **7 Points**  
□ Is within 5 percentage points of local benchmark in existing project = **5 Points**  
□ Is within 10 percentage points of local benchmark in existing project = **3 Points**  
□ Is > 10 percentage points below the local benchmark in existing project = **0 Points** |
| C       | Obtains/maintains non-cash mainstream benefits | 56% leavers and stayers |
|         | □ Meets or exceeds local benchmark in existing project = **7 Points**  
□ Is within 5 percentage points of local benchmark in existing project = **5 Points**  
□ Is within 10 percentage points of local benchmark in existing project = **3 Points**  
□ Is > 10 percentage points below the local benchmark in existing project = **0 Points** |
| D       | Exits to Homelessness | Approx. 10% of total bed capacity |
|         | □ Meets or exceeds local benchmark in existing project = **8 Points**  
□ Is within 1 exit of local benchmark in existing project = **6 Points**  
□ Is within 2 exits of local benchmark in existing project = **3 Points**  
□ Is 3 or more exits above the local benchmark in existing project = **0 Points** |

<table>
<thead>
<tr>
<th>Total Bed Capacity in Program</th>
<th>Benchmark Number of Exits to Homelessness (Approx. 10% of bed capacity)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-14</td>
<td>1</td>
</tr>
<tr>
<td>15-24</td>
<td>2</td>
</tr>
<tr>
<td>25-34</td>
<td>3</td>
</tr>
<tr>
<td>35-44</td>
<td>4</td>
</tr>
<tr>
<td>45-54</td>
<td>5</td>
</tr>
<tr>
<td>55-64</td>
<td>6</td>
</tr>
<tr>
<td>65-74</td>
<td>7</td>
</tr>
<tr>
<td>75-84</td>
<td>8</td>
</tr>
<tr>
<td>85-94</td>
<td>9</td>
</tr>
<tr>
<td>95-104</td>
<td>10</td>
</tr>
<tr>
<td>115-124</td>
<td>12</td>
</tr>
<tr>
<td>175+</td>
<td>18</td>
</tr>
</tbody>
</table>
### 2. Rapid Rehousing, Youth Serving Transitional Housing and Joint TH and PH-RRH

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtains Permanent Housing</td>
<td>80%</td>
<td>- Meets or exceeds local benchmark in an existing project = <strong>10 Points</strong>&lt;br&gt;- Is within 5 percentage points of the local benchmark in existing project = <strong>8 Points</strong>&lt;br&gt;- Is within 10 percentage points of the local benchmark within an existing project = <strong>4 Points</strong>&lt;br&gt;- Is &gt; 10 percentage points below the local benchmark = <strong>0 Points</strong></td>
</tr>
<tr>
<td>B Adults who increase income</td>
<td>30% of leavers and stayers</td>
<td>- Meets or exceeds local benchmark in existing project = <strong>7 Points</strong>&lt;br&gt;- Is within 5 percentage points of local benchmark in existing project = <strong>5 Points</strong>&lt;br&gt;- Is within 10 percentage points of local benchmark in existing project = <strong>3 Points</strong>&lt;br&gt;- Is &gt; 10 percentage points below the local benchmark in existing project = <strong>0 Points</strong></td>
</tr>
<tr>
<td>C Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td></td>
</tr>
<tr>
<td>D Returns to Homelessness</td>
<td>&lt;10%</td>
<td>- Meets or exceeds local benchmark in existing project = <strong>8 Points</strong>&lt;br&gt;- Is within 5 percentage points of local benchmark in existing project = <strong>6 Points</strong>&lt;br&gt;- Is within 8 percentage points of local benchmark in existing project = <strong>3 Points</strong>&lt;br&gt;- Is &gt;8 percentage points below the local benchmark in existing project = <strong>0 Points</strong></td>
</tr>
</tbody>
</table>
### 3. General (non-youth serving) Transitional Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtains Permanent Housing</td>
<td>80%</td>
<td>Meets or exceeds local benchmark = <strong>10 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 5 percentage points of the local benchmark = <strong>8 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 10 percentage points of the local benchmark = <strong>4 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is &gt; 10 percentage points below the local benchmark = <strong>0 Points</strong></td>
</tr>
<tr>
<td>B Adults who maintain or increase income</td>
<td>50% of leavers and stayers</td>
<td>Meets or exceeds local benchmark = <strong>7 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 10 percentage points of local benchmark = <strong>6 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 15 percentage points of local benchmark = <strong>3 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is &gt; 15 percentage points below the local benchmark = <strong>0 Points</strong></td>
</tr>
<tr>
<td>C Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% leavers and stayers</td>
<td>Meets or exceeds HUD benchmark = <strong>7 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 5 percentage points of HUD benchmark = <strong>6 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 10 percentage points of HUD benchmark = <strong>3 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is &gt; 10 percentage points below the local benchmark = <strong>0 Points</strong></td>
</tr>
<tr>
<td>D Length of Time Homeless (length of stay in program)</td>
<td>Median LOS &lt;180 days</td>
<td>Meets or exceeds local benchmark = <strong>8 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 10% (18 days) of local benchmark = <strong>6 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is within 20% (36 days) of local benchmark = <strong>3 Points</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is &gt; 20% above local benchmark = <strong>0 Points</strong></td>
</tr>
</tbody>
</table>
Attachment A

Instructions for 2018 HUD NOFA Target Population Report

Updated March 26th, 2018
by EveryOne Home

These Instructions have been prepared to guide Projects on completing the 2018 HUD NOFA Target Population Report, which assesses the practices and prioritization of Target Populations and Severity of Need for each Project. This Report looks at data for clients with a program entry date from 10/1/16 - 9/30/2017. This method of calculation takes into account the fact that many projects have long-time clients who skew their data in a certain way but are now filling any turnover beds with high-needs or priority target populations. The instructions cover three Sections: (1) Running the **2017 NOFA - Program Entry Report**, (2) Running the **Demographics - With Detail** report (for PSH Projects only), and (3) Running the Excel **EveryOne Home HUD Target Population Data Tool** to summarize the data. The corresponding manual calculations behind this Tool can be found starting on Page 16 of **Attachment C - Manual Calculations & Explanation of Tool Calculations for Performance Outcomes**.

**NOTE:** Agencies not using HMIS (e.g. domestic violence providers) can submit a Target Population Report following the instructions starting on Page 9 of this Attachment.

If you have any questions, please direct them to info@everyonehome.org. The FAQ period begins Monday, April 2, 2018 and ends Friday, April 6, 2018.

Projects renewing for the first time that are not yet under contract, or which were not in operation for a full twelve months since October 1, 2016:
Renewing projects without a year of operation and expenditures need only to submit an updated Project Cover Sheet. They will receive the score awarded when they applied as a new project and be ranked according to that score.

Projects with a start date later than October 1, 2016 and a full year of program data may elect to receive the score awarded when they applied as a new project or submit a full Project Evaluation Package based on data from their start date to twelve months later.

New TH-RRH Projects can have the option to: 1) keep the score obtained when applying as a new TH-RRH project in 2017, or 2) or submit a full Project Evaluation package to be evaluated according to data from 2017 as a general TH Project.

Projects that choose to keep their prior score need only to submit an updated Project Cover Sheet. They may also be asked to complete a Project Milestone Update as part of a Monitoring TA/Site Visit.
Target Population Report Tool Instructions for Agencies Not in HMIS

Given that the 2018 NOFA Program Entry Report is dependent on Alameda County’s ServicePoint HMIS system, Agencies not in HMIS cannot complete the 2018 HUD NOFA Target Population Report as instructed above. Agencies such as DV providers with a comparable database with the necessary information, can perform the calculations and enter data manually into the 2018 HUD NOFA Target Population Report.

The calculations for Target Population data are tabulated as follows:

1. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who entered from a place not meant for human habitation. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>Residence Prior to Program Entry</td>
<td>Place not meant for habitation (HUD)</td>
</tr>
</tbody>
</table>

2. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who are fleeing from domestic violence or human trafficking. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>Survivor or Victim of Domestic</td>
<td>Yes (HUD)</td>
</tr>
<tr>
<td>Violence or Human Trafficking</td>
<td></td>
</tr>
<tr>
<td>If yes to the above question, still</td>
<td>Yes (HUD)</td>
</tr>
<tr>
<td>currently fleeing?</td>
<td></td>
</tr>
</tbody>
</table>

3. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who are veterans of the U.S. Military. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>U.S. Military Veteran?</td>
<td>Yes (HUD)</td>
</tr>
</tbody>
</table>
4. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who were between the ages of 18 and 24 at the time of program entry. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>Age at Program Entry</td>
<td>Between 18-24</td>
</tr>
</tbody>
</table>

5. (PSH Only) Households with a program entry date between 10/1/2016 – 9/30/17 with one or more chronically homeless persons. The count is based on number of HOUSEHOLDS who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>With 1 or more CH persons</td>
<td>Yes</td>
</tr>
</tbody>
</table>

6. (All projects) Households with a program entry date between 10/1/2016 – 9/30/17. The count is based on number of HOUSEHOLDS who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
</tbody>
</table>

Once the above information, from 1 to 6, is gathered, open the Non-HMIS Version of the EveryOne Home Target Population Report and input the information into the “Report Details” tab.

In the following illustration, the red numbers correspond directly to 1 through 6 of the above list and indicate the data that should be entered.

There are already formulas in the Excel sheets to calculate the summary score, % households, and other information. Therefore, sections 1 through 6 are the only data points that the agency needs to input.
2018 NOFA Local Review Process Renewals’ Project Evaluation Package

Please download the Project Evaluation Instructions and Form below. Review the instructions located on pages i-v of the EveryOne Home instructions and Evaluation Form carefully. The Cover Sheet for each Project has been emailed to the specific NOFA grantee.

The Project Evaluation Package is due via email to info@everyonelhome.org by 5pm on Thursday, April 26th, 2018. Preliminary scores will be released via email by close of business on Monday, April 30, 2018.

Instruction Update for All Projects: The APR and Target Population Report Tools have been updated from our initial release on 3/29/2018 to correct errors, missing to: (i) divisions by zero; (ii) calculations for Outcome B for RRH and TAYTH; (iii) import errors, and (iv) rounding errors. All projects are asked to re-run reports using the updated APR and Target Population Report Tools for submission.

The Project Eval Form was updated on 4/12/2018 to correct a technical error when making selections in the Scoring Tool.

2018 Project Evaluation FAQ and Instruction Update
2018 Project Evaluation Instructions and Form
2018 EveryOne Home HUD CoC APR Tool (Updated 4.6.18)
2018 EveryOne Home HUD Target Population Report Tool (Updated 4.5.18)
2018 (Non-HMS Agencies Only) HUD Target Population Report Tool
Target Population Instructions (Attachment A)
APR Instructions (Attachment B)
Performance Outcome Manual Calculations (Attachment C)
2017 HIC and GRW (Attachment D)

2017 NOFA Debrief Input Session Materials

Below are the materials from the NOFA Debrief Input Session on February 27th. Please note that the date for the 2018 NOFA Process Renewals Project Evaluation package release has been moved.
HUD COC NOFA

2018 HUD COC NOFA Materials

2018 Applications

2018 COC Program Competition NOFA Wider Change and Highlights

2018 COC Program Application

Strategic Direction Memo to NOFA Committee

2018 NOFA Program Housing Aid Committee

2018 News and Press Release Updates

Everyone Home and the 2018 HUD COC NOFA

Check the NOFA for new projects (not DOB); has not changed

The deadline for submitted projects and other new projects (not DOB) is not changed

The NOFA Committee has determined to extend the application deadline for the 2018 NOFA DOB

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EveryOne Home INSTRUCTIONS and EVALUATION FORM for
2018 CoC RENEWAL LOCAL APPLICATION PACKAGE SUBMISSIONS

2018 CoC Renewal Local Application Instructions

2018 Local Renewal Process
EveryOne Home (EOH), Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting renewing CoC projects anticipating CoC-funds in 2018 to participate in the Local Application Package – Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its NOFA Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD NOFA is released

For further information on this Process, please refer to EveryOne Home’s 2018 Local Renewal and New Projects Review Process available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.

The United States Department of Housing and Urban Development (HUD) requires that all Project applications included in the CoC Consolidated Application be rated and ranked by the local Continuum of Care (CoC) including renewal projects, and proposed new reallocation, bonus, and Domestic Violence (DV) Bonus projects proposed. Without a Local Application, Projects cannot be scored or ranked and cannot be included in the final application package.

Previously, Renewal Project applications and Newly Proposed Project applications were combined into a single project application. As of 2018, EOH will be returning to two separate applications for renewing and new projects. These Local Application Instructions and Evaluation Form are for Renewal Projects only. Newly proposed projects are asked to complete a New Projects Local Application available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/and should not make any submissions using this form.

New this year, EveryOne Home Staff scored Renewal Projects’ objective criteria (previously scored during the Local Application competition) during the Project Evaluation of Objective Criteria. Preliminary scores resulting from the Project Evaluation of Objective Criteria (worth up to 79 points) were released to projects on Monday, April 30, 2018 via email.

Renewal Project Local Applications will be scored on a 21-point scale in five categories:
1. Narrative for Housing First (scored by NOFA Committee) = Up to 4 points
2. Spending = Up to 5 points
3. Cost Effectiveness = Up to 2 points
4. Narrative for Quality Assurance (scored by NOFA Committee) = Up to 7 points
5. NEW: Consolidation of existing renewals = 3 points
Scores to be awarded to renewal projects during the Local Application (up to 21 points possible) are cumulative with preliminary scores awarded to the Project Evaluation Package (up to 79 points) for a total of 100 points possible.

Renewal Projects may also increase Project Evaluation Preliminary scores under the following four Sections:
1. Documentation for Housing First = Up to 6 points
2. Documentation for Client Eligibility = Up to 5 points
3. Performance Outcomes = Up to 32 points
4. Fiscal Management = Up to 2 points

All Renewal Projects will be invited to submit additional or updated Housing First documents (to reflect Housing First compliance) and may increase points for this section.

All Renewal Projects that scored less than full points for certain objective criteria during the Project Evaluation may attach an Annual Performance Report (APR) or equivalent report from a more recent period than the Project Evaluation Package and may increase points under each section, as applicable.

All projects seeking to potentially increase Project Evaluation Preliminary scores must attach documentation as required on Page 6 of this Application.

In addition, all Projects will be responding to an additional question, that will not be scored in 2018, consistent with HUD requirements for the Competitive application:
1. Community and Client Engagement, including describing Projects
   - Relationships and/or MOU with schools or projects to meet children’s educational needs (for family/youth projects only)
   - Whether project offers volunteer/work opportunities to clients/tenants or links them with vocational programs

New in 2018, Eligible renewal projects will have the ability to consolidate two or more projects (up to four) in one project application – without having to wait for a grant amendment to be executed to consolidate two or more grants. Applicant must consult first with HUD Field Office on whether the Project is eligible for consolidation and provide proof when submitting Local Application package. Projects with outstanding audits or findings, obligation to HUD in arrears, history of poor financial management/drawdowns, or low-occupancy and/or capacity will not be allowed to consolidate. Eligible renewals will receive 3 additional points for applying to consolidate their existing grants.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Monday, September 3, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.

Projects renewing for the first time that are not yet under contract, which were not in operation for a full twelve months since October 1, 2016, or Projects with a start date later than October 1, 2016 and a full year of Project data have previously been provided the opportunity to elect to receive the score awarded when they applied as a
new project or submit a full application during the Project Evaluation Package. **Projects that previously chose to keep their prior score do not need to make any submissions at this time.**

New Joint TH and PH-RRH have previously been provided the opportunity to elect to receive the score awarded when they applied as a new project or submit a full application during the Project Evaluation Package stage. **New Joint TH and PH-RRH that chose to keep their prior score do not need to make any submissions at this time.**

**Project types that must submit the attached Renewal Local Application Form:**
- **Renewing** Permanent Supportive Housing (PSH),
- **Renewing** Transitional Housing (TH) (both youth-serving and general-use), and
- **Renewing** Rapid Rehousing (RRH) projects that serve homeless individuals and families, including unaccompanied youth;


**Total Funding Available:**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Annual Renewal Demand (ARD)</td>
<td>$34,329,783</td>
</tr>
<tr>
<td>Tier 1 Amount (94% ARD)</td>
<td>$32,269,996</td>
</tr>
<tr>
<td>ARD in Tier 2 (6%)</td>
<td>$2,059,787</td>
</tr>
<tr>
<td>Bonus</td>
<td>$2,059,787</td>
</tr>
<tr>
<td>Total Tier 2 (6% + Bonus)</td>
<td>$4,119,574</td>
</tr>
<tr>
<td>DV Bonus</td>
<td>$1,062,887</td>
</tr>
<tr>
<td>CoC Planning Grant</td>
<td>$1,029,893</td>
</tr>
<tr>
<td><strong>2018 Total Submission allowed</strong></td>
<td><strong>$37,452,457</strong> (does not include CoC Planning Grant)</td>
</tr>
</tbody>
</table>

Alameda County’s approved Annual Renewal Demand (ARD) = $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in bonus new projects and up to three (3) additional Domestic Violence (DV) Bonus projects funded by the 2018 new DV Bonus. The application package to HUD will also include a CoC Planning Grant, requested only by the Collaborative Applicant for CoC-related activities, which is not ranked competitively and does not affect the amount available to projects.

The total funds requested from Alameda County that are competitively scored cannot exceed the combined amounts of the ARD, bonus, and DV Bonus funds, which is currently $37,452,457.

HUD continues to require CoCs to rank their projects in two tiers, Tier 1 and 2. Tier 2 projects are at risk of not getting funded and must compete against all other Tier 2 projects nationally. For 2018, Tier 1 is 94% of the CoCs FY 2018 Annual Renewal Demand. Tier 2 is the 6% difference between Tier 1 and the CoC’s ARD, plus any amount for the bonus. HUD will fund Tier 2 projects after it has made funding awards to all Tier 1 projects nationally. Projects will be scored on a 100-point scale based on the following:

a. **CoC Score:** Up to 50 points in direct proportion to the score received on the CoC Application rounded to the nearest whole point. **Based on last year’s CoC score of 157.25, our Tier 2 projects would have received 39 points out of 50.**
b. CoC Project Ranking: Up to 40 points for the CoCs ranking of the project. See page 16 of the NOFA for a detailed description of the formula.

c. Up to 10 points for commitment to applying the Housing First model.

**Eligible Renewal Projects:**
Applicants for Renewal Projects must be listed as the current grant recipient on the CoC’s 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the Grant Inventory Worksheet (GIW), please contact Riley Wilkerson at Riley.Wilkerson@acgov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant.

**Projects that are not planning on renewing their CoC funding:**
Projects who find mainstream funders to cover project costs with resources that are a better fit, or that determine they are unlikely to receive the minimum score in the Local Competition may elect not to submit an eligible project for renewal. Projects eligible to be renewed, but not planning on renewing CoC funding in the 2018 NOFA competition should have reported it to EveryOne Home before April 26, 2018. If you have missed this deadline and would like to withdraw your project from consideration, please notify EveryOne Home via email at info@everyonehome.org by August 17, 2018 to certify the projects’ withdrawal in writing.

The funds for projects not electing to renew will be added to the pool of available funds for reallocation to new projects. **The decision not to renew is permanent.** Once eliminated from the package, the same project cannot reapply in subsequent years. Only **new** projects created by reallocated funds or bonus funds can get added to our package in future application rounds.

**Voluntary reductions of grants:** Projects that have consistently underspent funds may wish to consider reducing their renewal amounts. Page 1 of the application has a space to indicate if the amount requested is less than the amount indicated on the GIW and by how much. Projects cannot request more than what is listed on the GIW.

**Submission Requirements:**
All project types must submit their Local Application via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed Local Application Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the Applicant and Project names.

The Local Application Package will be released on Friday, July 20, 2018. A complete submitted Package will contain: 1) a complete Local Application Form and; 2) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are **required** to be attached for Projects to receive full points on a related section of the application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

**Coordinated Entry Threshold Requirements:**
All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred
from Coordinated Entry. All 2018 NOFA Local competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required for participation.

Required Documentation for Local Application (see Checklist under Local Application Form, Page 1):

1. **Local Application Form**
   i. A completed Local Application Form

2. **NEW Consolidation**
   i. Projects applying for Consolidation must attach written approval by HUD that projects are eligible for Consolidation.

3. **NEW Community and Client Engagement**: Serving the Educational Needs of children and youth (Projects serving households with children and youth only):
   i. Projects written policies, formal agreements, MOUs or partnerships with local school(s), youth education providers, early childhood providers, Head Start or other educational services to meet the educational needs of children and youth.

Required Documentation for the Project Evaluation Resubmission (see Checklist under Project Evaluation Resubmission Form, Page 6):

1. **HMIS-Based Reports**:
   i. Annual Performance Report (or equivalent report for non-HMIS providers) from date range: 10/1/2017 – Present (as applicable)

2. **Housing First Documents**:
   i. Updated or revised Resident Selection Criteria and Housing Applications; Project Participant Agreements; House Rules; Lease and sub-Leases; and/or additional Housing First documents as discussed in Housing First TA sessions (as applicable)

3. **Client Eligibility**:
   i. Updated or revised Project Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, Vet, etc.), or written procedures for verifying eligibility (as applicable)

4. **Grant and Fiscal Management**:
   i. For Audits with findings, a formal documented response by the Agency and/or funder on how they have addressed the deficiency (as applicable)

The scoring tool at the back of this application details how projects earn points in each category. The application form and the scoring tool are tightly linked. As you prepare the application, the scoring chart at the end of this Local Application can be detached and used alongside many of the sections to self-score.

**Project Scoring and Ranking:**

Projects must score a minimum of 60 points to be assured inclusion in the application package. Projects scoring below that threshold will be reallocated. Applicants are strongly encouraged to review the Local Application, and to self-score their project on the performance indicators as soon as possible to determine if they will meet the minimum score. If in self-scoring the project does not appear to meet threshold, please contact info@everyonehome.org.

In addition to the total score projects receive, reviewers may use additional factors to break ties, adjust the final ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other local
objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that may be considered include:

- the geographic and population diversity of the projects included;
- the projected impact of the loss of any residential buildings on homeless people;
- the expiration date and amount of the grant.

Download a Word version of this application from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on Page i. Multiple PDFs for agencies with large files for backup are acceptable.

For questions regarding the completion of the Local Application, please contact EveryOne Home at info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on August 2, 2018. Questions received will be responded to in writing individually and posted to the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/ in two batches on July 31, 2018 and August 3, 2018.

**Appeals Process**

The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) **What can be appealed:** An application that
   a. Was not evaluated according to the published local NOFA process **AND/OR**
   b. Evaluated in a way that violates federal regulations **AND**
   c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked **OR** whether an Applicant project is included in the package at all. **Note:** this includes any Project who meet Appeals Criteria #a and/or #b, and its initial ranking and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) **What is not eligible for appeal:**
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project's scores
   d. Need for funds
   e. Appeals submitted after stated deadline


All project applications received by the deadline will be reviewed and applicants will be notified by Friday, August 31, 2018 of their score, their initial ranking, and whether they are being included in the Consolidated Application. Ranking is subject to change according to appeals (if any) and the final ranking will be released September 14, 2018.

**2018 NOFA Timeline Highlights:**

- Project Evaluation Package Preliminary scores released to Projects – April 30, 2018
- Local Application released – July 20, 2018
- FAQ period begins – July 20, 2018
- FAQ period ends – August 2, 2018
- Local Application due back to EveryOne Home – August 17, 2018
- Preliminary Rating & Ranking List scores released to Projects - August 31, 2018
- Appeals Period begins - September 5, 2018
- Appeals Period ends – September 7, 2018
- Final Rating & Ranking List released to Projects - September 14, 2018
2018 New Projects Review Process
EveryOne Home, Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting projects anticipating CoC-funds to participate in the 2018 New Projects Local Application - Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its Local Application into three Stages:
- Stage 1 - Renewals’ Project Evaluation of Objective Criteria
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD CoC NOFA is released

For further information on this Process, please refer to the EveryOne Home’s 2018 Local Renewal and New Projects Review Process (available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/).

The United States Department of Housing and Urban Development (HUD) requires that all local project applications included in the CoC Consolidated Application be rated and ranked, including renewal projects, and proposed new projects created with reallocation, bonus, and Domestic Violence Bonus funds. Without a local application, projects cannot be scored or ranked and cannot be included in the final application package submitted to HUD.

Previously, Renewal Project applications and New Projects applications were combined into a single project application. As of 2018, EveryOne Home will be returning to two separate applications for renewing and new projects. These Local Application Instructions and Evaluation Form are for New Projects only.

Total Funding Available:
Total Annual Renewal Demand (ARD) = $34,329,783
Tier 1 Amount (94% ARD) = $32,269,996
ARD in Tier 2 (6%) = $2,059,787
Bonus = $2,059,787
Total Tier 2 (6% + Bonus) = $4,119,574
DV Bonus = $1,062,887
CoC Planning Grant = $1,029,893
2018 Total Submission allowed = $37,452,457 (does not include CoC Planning Grant)

Alameda County’s 2018 approved Annual Renewal Demand (ARD) is $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in Bonus funds for one or more eligible project components. New in 2018, our CoC may apply for up to $1,062,887 for up to three (3) Domestic Violence Bonus projects (DV Bonus) to provide housing and services to survivors of domestic violence, dating violence, human trafficking and stalking. The application package will also include a CoC Planning Grant of up to $1,029,893. The CoC Planning grant, requested only by the Collaborative Applicant for CoC-related activities, is not ranked competitively and does not affect the amount available to projects.
The total funds requested from Alameda County that are competitively scored (excluding the CoC Planning Grant) cannot exceed the combined amounts of the ARD and the Bonus and DV funds, which is equals $37,452,457.

**Project types eligible for New Projects Local Application**

- **New** Permanent Supportive Housing (PSH) where 100% of the beds are dedicated to serve chronically homeless individuals, households with children, including unaccompanied youth and/or Projects designated as DedicatedPLUS (DDP)
- **New** Rapid Rehousing (RRH) for individuals and families, including unaccompanied youth
- **New** Joint Transitional Housing and Permanent Housing and Rapid Rehousing component (Joint TH and PH-RRH)
- **New** Homeless Management Information System Project
- **New** Support Services Only for Coordinated Entry to develop or operate a Centralized or Coordinated Assessment System (SSO-CE)
- **For New Domestic Violence Bonus Projects** to provide housing and services to domestic violence, dating violence, stalking and trafficking survivors:
  - **New** Rapid Rehousing (RRH)
  - **New** Joint Transitional Housing and Permanent Housing and Rapid Rehousing component (Joint TH and PH-RRH) to better serve individuals and families, including individuals and families fleeing or attempting to flee DV, dating violence, sexual assault, stalking and trafficking.
  - **New** Supportive Services Only for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, human trafficking, or stalking (i.e., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers).

**Eligible Applicants**

To apply for a new project, Applicants must be a non-profit or entity of local government that operates a:

1) **CoC funded Renewal Project** listed as the current grant recipients on the CoC’s 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the GIW, please contact Riley Wilkerson at Riley.Wilkerson@acgov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant; or

2) **Non-CoC funded existing Projects** seeking to expand existing operations for eligible new project types (PH-PSH; PH-RRH; Joint TH and PH-RRH) or to provide a new DV Bonus project under eligible new DV Bonus project types (PH-RRH, Joint TH and PH-RRH, and SSO Projects for Coordinated Entry to implement policies, procedures, and practices for Coordinated Entry (CE) to better meet the need of survivors of DV, dating violence, sexual assault, or stalking. Project applicants cannot use CoC program funds to replace state and local funds.

   a. **Non CoC funded Projects** must demonstrate capacity and appropriate qualifications, including prior experience managing projects and performing activities like those proposed in the application, prior performance on relevant grants, and experience in utilizing government funds. For DV Bonus Projects, Applicants must demonstrate experience in serving survivors of domestic violence, dating violence, sexual assault, stalking, and trafficking, and ability to house survivors and meet safety outcomes. For those applying for SSO Projects for Coordinated Entry.
Applicants must also demonstrate prior experience providing services to DV survivors and expertise in policy and training in the fields of domestic violence, sexual assault and/or trafficking.

New Projects Creation:
Applicants may apply for new projects through:

A. Reallocation and Bonus for Conversion/Expansion of current operations:
The CoC welcomes voluntary reallocation of HUD funds that strengthens our system and application package and is aligned with our guiding principles.

- **Reallocation:** CoC funded renewal projects may apply to reallocate an existing project into a new eligible project type (such as from TH to PH-RRH). The process requires the elimination of the existing renewal.
  - **Transition Grants (new in 2018):** Applicants seeking to reallocate an existing renewal project may apply as a Transition grant (NOFA, Page 20). Up to 50% of each transition grant may be used for costs of eligible activities of the program component originally funded. Project will have one year to fully transition from the original component to the new component and this will take place during the transition grants normal year and must have the consent of the Continuum of Care (CoC). Projects using Consolidation of existing projects cannot apply for Transition grants (NOFA, Page 1).

- **Bonus:** The CoC is also inviting CoC-funded and non-CoC program funded projects seeking expansion of current operations to apply as new Bonus projects (NOFA, Page 17).
  - **Expansion:** Applicants (CoC funded and non CoC-funded) may submit a new project application to expand current operations to add units, beds, persons served, and services provided to existing participants, or in the case of HMIS, increase the current HMIS grant activities. Non-CoC project applicants may request CoC program funds to add to a current project funded from sources other than CoC funds, except to replace state or local funds.

B. New Domestic Violence (DV) Bonus Projects (new in 2018)
HUD added up to $50 million in DV Bonus to provide housing and services to survivors of domestic violence, dating violence, sexual assault and stalking. As stated above, $1,062,887 is available for the CoC to select up to three (3) DV Bonus Projects. The CoC will select and include in its package submission one project application per project type as required by HUD. Applicants can submit a new project application for the following project types:

1. Permanent Housing-Rapid Rehousing (PH-RRH) projects that follow a Housing First approach
2. Joint TH and PH-RRH projects (TH and PH-RRH) that follow a Housing First approach
3. SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, or stalking (e.g., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers).

Applicants may apply to expand an existing CoC funded renewal project not dedicated to DV survivors and dedicate additional units, beds, persons served, or services provided for this population. The DV
Bonus Projects will be ranked on the new Project Listing of the CoC Priority Listing with a unique rank number.

Scoring of New Project Applications
New Project applications will be scored on a 100-point scale in five categories:
1. Primary Activity Type = Up to 5 points
2. How Project Addresses Local and HUD Priorities = Up to 25 points
3. Outcome Performance = Up to 32 points
4. Grant Management = Up to 20 points
5. Organization Capacity = Up to 18 points

In addition, Projects will be responding to an additional question, that will not be scored in 2018:
1. Community and Client Engagement, including describing Projects:
   - Relationships and/or MOU with schools or projects to meet children’s educational needs (for family/youth projects)
   - Whether project offers volunteer/work opportunities to clients/tenants or links them with vocational programs.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Monday, September 3, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website.

Appeals Process
The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) **What can be appealed**: An application that
   a. Was not evaluated according to the published local NOFA process AND/OR
   b. Evaluated in a way that violates federal regulations AND
   c. **The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR** whether an Applicant project is included in the package at all. **Note**: this includes any Project who meet Appeals Criteria #1 and/or #2, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) **What is not eligible for appeal**:
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project’s scores
   d. Need for funds
   e. Appeals submitted after stated deadline

Submission Requirements:
All project types must submit their Local Application Package response via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed New Projects Local Application Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the applicant and Project names.

The Local Application Package will be released on Friday, July 20, 2018. A complete submitted Package will contain: 1) A completed Cover Sheet; 2) a complete New Projects Local Application Form; 3) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Projects to receive full points on a related section of the Application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

Coordinated Entry Threshold Requirement
All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred from Coordinated Entry. All 2018 NOFA Local competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required by participation.

Required Documentation (see Checklist under New Projects Local Application Form, Pages 1 through 2):
1. Homeless Management Information System (HMIS) or comparable Reports (Reports should be from October 1, 2016 – September 30, 2017):
   CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.
   a. Applicants proposing new projects can submit up to 2 APRs
      • If expanding an existing CoC funded project to a different population, including DV survivors, the existing project APR and an APR (or appropriate reports from a comparable data base) from a project serving the proposed population must be included.
      • If converting to a different project type, include APR for existing program and an APR (or appropriate reports from a comparable data base) from the program type being proposed.
      • If applicant is not an HMIS user, attach appropriate reports from a comparable data base. Contact EveryOne Home via email at info@everyonehome.org if you have questions about which reports in your data base to attach.

2. Housing First Documentation
   CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.
   a. Applicants proposing new projects must submit documentation consistent with Housing First principles (please refer to Appendix B – Housing First Checklist at EveryOne Home’s website at http://everyonehome.org/our-work/hud-coc-nofa/)
      • If proposing to serve a different population that modifies the Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules, the new or proposed housing first documentation must be submitted.
• If converting to a different project type, include existing or proposed housing first documentation, including Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules.

• If applicant not CoC funded, include documentation that shows implementation of housing first principles in a comparable program, including Resident Selection Criteria/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules. Contact EveryOne Home via email at info@everyonehome.org if you have questions about appropriate documents to attach.

3. Client Eligibility:

CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.

   a. Applicants must submit documentation of client eligibility and verification of eligibility.
      • If proposing to serve a different population that modifies the client eligibility and/or verification of eligibility, documentation must be submitted.
      • If converting to a different project type, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, vet, etc.), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. HOPWA or MHSA require specific disabilities).
      • If applicant not CoC funded, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children; individuals and families fleeing domestic violence), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. Housing for People with AIDS or Mental Health Services Administration) require specific disabilities).

4. Grant and Fiscal Management:

CoC funded projects do not need to submit documents in this section. Scores from their renewal application will be applied to the expansion or conversion new project.

   a. Reports and Invoicing
      • Applicants not CoC funded must submit proof of meeting report deadlines and invoicing draws on comparable HUD grants or government grants.

   b. Audits
      • Applicants not CoC funded must submit most recent annual independent audit with Management Letter or financial statement if audit not required —must be from a fiscal year ending December 31, 2015 or later.

   c. Proof of 501c3 non-profit status
      • Applicants not CoC funded must submit proof of 501c3 non-profit status

   d. Evidence of Site Control for Direct-Grantee Site-Based projects (Scattered-site PSH & RRH projects are exempt). Required for any proposed projects for which HUD is paying leasing, operating or rehabilitation cost on a building, both residential and service delivery sites. Without evidence of site control for new projects for whom the above is true, the project cannot be included in the package.
5. Qualifications and Experience (Non-CoC funded applicants and DV Bonus projects)
   a. Must provide 1 Letter of Recommendation demonstrating applicant’s capacity and
      experience managing projects and performing activities proposed in the application, and a
      list of applicant’s current government and private grants

   For DV Bonus Projects
   a. For RRH and Joint TH and PH-RRH, must provide 1 Letter of recommendation demonstrating
      experience in serving survivors of domestic violence, dating violence, sexual assault,
      stalking, and trafficking, and ability to house survivors and meet safety outcomes.
   b. For SSO Projects for Coordinated Entry, must provide 1 Letter of Recommendation
      documenting applicant’s experience providing services to DV survivors and expertise in
      policy and/or training in the fields of domestic violence, sexual assault and/or trafficking (for
      SSO Projects for Coordinated Entry)

6. NEW Community and Client Engagement: Serving the Educational Needs of children and youth (new
   projects serving households with children and youth only):
   a. Existing or proposed Applicant’s written policies, formal agreements, MOUs or partnerships with
      local school(s), youth education providers, early childhood providers, Head Start or other
      educational services to meet the educational needs of children and youth.

The scoring tool at the back of the application details how projects earn points in each category. The application
form and the scoring tool are tightly linked. As you prepare the application, the scoring chart at the end of this
local application can be detached and used alongside many of the sections to self-score.

Projects must score a minimum of 60 points to be assured inclusion in the application package. Applicants are
strongly encouraged to review the local application, and to self-score their project on the performance indicators
as soon as possible to determine if they will meet the minimum score. If in self-scoring the project does not appear
to meet threshold, please contact info@everyonehome.org.

In addition to the total score projects receive, reviewers may use additional factors to break ties, adjust the final
ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other
local objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that
may be considered include:
   • the geographic and population diversity of the projects included;
   • the projected impact of the loss of any residential buildings on homeless people;
   • the expiration date and amount of the grant.

Download a PDF version of the 2018 NOFA New Projects Local Application from the EveryOne Home website at
http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a
PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to
submit as described on Page 1. Multiple PDFs for agencies with large files for backup are acceptable. Public
entities are welcome to submit their formal audit responses via link in the cover email with relevant page
numbers of findings and letters indicated in their communication.

For questions regarding the completion of the local application, please contact EveryOne Home at
info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on

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EveryOne Home INSTRUCTIONS and EVALUATION FORM for
2018 CoC HMIS LOCAL APPLICATION PACKAGE SUBMISSIONS

2018 CoC HMIS Renewal and New HMIS Project Local Application Instructions

2018 Local Renewal Process
EveryOne Home, Alameda County's Continuum of Care (CoC) Lead Agency, is inviting projects anticipating CoC-funds to participate in the 2018 Local Application for the 2018 Notice of Funding Availability (NOFA), including to respond to the HMIS Renewal and New Project Local Application. In 2018, EveryOne Home divided its Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria (did not include HMIS project)
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD CoC NOFA is released

For further information on this Process, please refer to the EveryOne Home’s 2018 Local Renewal and New Projects Review Process [available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/]. The United States Department of Housing and Urban Development (HUD) requires that all local project applications included in the CoC Consolidated Application be rated and ranked, including renewal projects, and proposed new projects created with reallocation, bonus, and Domestic Violence Bonus funds. Without a local application, projects cannot be scored or ranked and cannot be included in the final application package submitted to HUD.

These Local Application Instructions and Evaluation Form are for HMIS Projects only. Non-HMIS New and Renewal Projects should not make any submissions using this form.

Total Funding Available:
Total Annual Renewal Demand (ARD) = $34,329,783
Tier 1 Amount (94% ARD) = $32,269,996
ARD in Tier 2 (6%) = $2,059,787
Bonus = $2,059,787
Total Tier 2 (6% + Bonus) = $4,119,574
DV Bonus = $1,062,887
CoC Planning Grant = $1,029,893
2018 Total Submission allowed = $37,452,457 (does not include CoC Planning Grant)

Alameda County's 2018 approved Annual Renewal Demand (ARD) is $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in Bonus funds for one or more eligible project components). New in 2018, our CoC may apply for up to $1,062,887 for up to three (3) Domestic Violence Bonus projects (DV Bonus) to provide housing and services to survivors of domestic violence, dating violence, human trafficking and stalking. The application package will also include a CoC Planning Grant of up to $1,029,893. The CoC Planning grant, requested only by the Collaborative Applicant for CoC-related activities, is not ranked competitively and does not affect the amount available to projects.
The total funds requested from Alameda County that are competitively scored (excluding the CoC Planning Grant) cannot exceed the combined amounts of the ARD and the Bonus and DV funds, which is equals $37,452,457.

**New Projects Creation:**
HMIS applicant can apply for a new HMIS project through reallocation or bonus funds. The CoC is inviting CoC-funded projects seeking expansion of current operations to apply as new Bonus projects, and in the case of HMIS, to propose to expand current HMIS grant activities.

**HMIS Project Scoring and Ranking:**
HMIS projects will be score on a 100-point scale in five categories:
1. Project Type = Up to 5 points
2. Bed Coverage = Up to 15 points
3. Generating Required Reports = Up to 15 points
4. Point-In-Time Count = 15 Points
5. Ability to Generate System Performance Report = 10 points
6. Fully Expend Grant = Up to 5 points
7. Timely Submission of Grant Reports = 10 points
8. Data Quality assurance = Up to 15 points
9. Quality Assurance = Up to 10 points

If expanding to a new HMIS Project, a 110-point scale will be used by including the same point values as described above and adopting the performance of the existing HMIS project, with the addition of earning up to 10 additional points by describing how the proposed increased HMIS activities and funds will be expended consistent with the CoC’s HMIS funding and implementation strategy (see Page 9). This is a new required HUD rating factor for new HMIS Projects (NOFA, Page 38).

**Project must score a minimum of 60 points to be assured inclusion in the application package.** Projects scoring below that threshold will be reallocated. Applicants are strongly encouraged to review the Local Application, and to self-score their project on the performance indicators as soon as possible to determine if they will meet the minimum score. If in self Scoring the project does not appear to meet threshold, please contact info@everyonehome.org.

In addition to the total score projects receive, reviewers may use additional factors to break ties, adjust the final ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other local objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that may be considered include:
- the geographic and population diversity of the projects included;
- the projected impact of the loss of any residential buildings on homeless people;
- the expiration date and amount of the grant.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Friday, August 31st, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.
Eligible Applicants:
Only the HMIS Lead Agency may apply to the HUD CoC program for operating a Homeless Management Information System (HMIS). Alameda County Department of Housing and Community Development is the HMIS Lead agency for the Continuum of Care and the only eligible applicant for this project type. Applicants for renewing grants must be listed as the current grant recipient on the CoC’s 2018 Grant Inventory Worksheet approved by HUD.

Submission Requirements:
All project types must submit their Local Application Package response via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed HMIS Local Application Form, Grantee must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the applicant and Project name.

The HMIS Local Application Package will be released on Monday, July 30, 2018. A complete submitted package will contain: 1) a complete HMIS Local Application Form; and 2) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Project to receive full points on a related section of the Application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

The required documents and instructions for their uses are described in greater detail in the sections below.

HMIS-based Reports:
- HMIS report verifying bed coverage (2018 HIC)
- HMIS report verifying ability to generate, system-wide APRs, AHAR, and the CAPER (most recent submissions)
- Proof of the sheltered PIT and sub-populations report submitted for January 2018 (2018 PIT)
- Systemwide APR for Federal fiscal year ending 9/30/17
- HMIS reports verifying ability to produce HDX tables for systemwide performance report (Federal fiscal year ending 9/30/17)

Grant and Fiscal Management documents:
- Proof of submission of the last three APRs, including due date and date of submission
- Proof of LOCCS draws, including date of draw request, for the last two complete grant cycles
- Most recent annual audit with Management Letter—must be from a fiscal year ending December 31, 2016 or later. If Applicant has submitted this document for another renewal project, the HMIS applicant will receive the same score for the renewal project under this Section.

Applicants responding to this RFP should be very familiar with the 2018 HUD NOFA and with the detailed guidance for completing new and renewing applications in e-snaps. Applicants are expected to know the eligible types of assistance, eligible populations, required match and other requirements from HUD. See 2018 CoC Notice of Funding Availability (NOFA) Competition.pdf for more information.
Download a Word version of this application from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on Page 1. Multiple PDFs for agencies with large files for backup are acceptable.

For questions regarding the completion of the Local Application, please contact EveryOne Home at info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on August 2, 2018. Questions received will be responded to in writing individually and posted to the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/ in two batches on July 31, 2018 and August 3, 2018.

Appeals Process
The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) What can be appealed: An application that
   a. Was not evaluated according to the published local NOFA process AND/OR
   b. Evaluated in a way that violates federal regulations AND
   c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all.
   Note: this includes any Project who meet Appeals Criteria #a and/or #b, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) What is not eligible for appeal:
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project’s scores
   d. Need for funds
   e. Appeals submitted after stated deadline


All project applications received by the deadline will be reviewed and applicants will be notified by Friday, August 31, 2018 of their score, their initial ranking, and whether they are being included in the Consolidated Application. Ranking is subject to change according to appeals (if any) and the final ranking will be released September 14, 2018.
MEMORANDUM

To: NOFA Committee; System Coordination Committee; EveryOne Home Leadership Board; Funder’s Collaborative

From: HUD CoC Committee

Date: July 17th, 2018

Re: Strategic Direction from HUD CoC Committee for Responding to the 2018 Continuum of Care Program Notice of Funding Availability (CoC NOFA)

The purpose of this Memo is to provide the HUD NOFA Committee with strategic guidance for approaching the local rating and ranking process for projects seeking to be included in the collaborative application for up to $37,452,457 in 2018 CoC Program funding for Alameda County. It is also a recommendation to the System Coordination Committee, EveryOne Home Leadership Board, Funders’ Collaborative, and local elected officials.

This strategic guidance was approved by the HUD CoC Committee in its July 17th meeting in Oakland. EveryOne Home staff provided analysis of the last two competitive applications and NOFA results and recommended strategies for this year’s NOFA competition. HUD CoC and NOFA committee members discussed and provided feedback that resulted in the set of Recommendations below to execute a fair local process to maintain an effective array of HUD CoC funded projects.

In addition to the set of Recommendations below, the most important message coming from the HUD CoC Committee is that without increasing local investment and aligning strategies to impact system performance, our Continuum is at serious risk of losing HUD funds in future NOFA rounds. As HUD continues to increase its ranking of Continuum’s based on their system performance, including how CoCs reduce first time homelessness, increase placement and retention into permanent housing, and reduce returns to homelessness, we must advocate the urgency of marshalling resources and strategies to improve aspects of system performance that are beyond the scope of HUD CoC funded individual projects. For example, the 11% increase in first time homelessness between FY 2016 and FY 2017 is a prevention issue, and there are not prevention projects in the HUD CoC package or prevention funds targeted for individuals and families facing imminent homelessness.

This Strategic Direction will be shared at the upcoming July 20th Bidder’s Conference for community’s consideration of the implementation of this guidance. In addition, we will share the same direction with the System Coordination Committee, the EOH Leadership Board, the
Funder's Collaborative, and with elected officials, as we adopt specific strategies and actions focused on preventing homelessness and increasing permanent homes through the Alameda county-wide 2018 Ending Homelessness Strategic Plan Update.

The NOFA Committee incorporate this strategic direction and set of recommendations in its process of designing the 2018 Local Application and scoring criteria:

**Recommendations**

**Recommendation 1: Strategic and purposeful Reallocation of Projects to better meet the needs of the Continuum of Care**

The HUD CoC Committee directs the NOFA Committee to pursue reallocation that strengthens our system and application package and is aligned with our guiding principles. For this year and future years, the HUD CoC Committee strongly recommends strategic reallocation of Projects with unspent funds and existing Projects seeking to convert to other project types (such as TH projects seeking to reallocate to Joint TH and PH-RRH projects) to better meet the needs of the CoC.

The Committee is also supportive of continuing to pursue strategies already in use such as; 1. Maintaining a minimum scoring threshold, and 2. Inviting voluntary reallocation.

**Recommendation 2: Incentivize the consolidation of existing renewal projects.**

Given that this year's NOFA allows two or more projects eligible for renewal to consolidate and apply for funding to be combined into a single renewal project (once awarded), the HUD CoC Committee recommends the NOFA Committee considers providing point incentives during the Local Application to grantees willing to apply for consolidation of existing projects.

**Recommendation 3: Solicit applications for new projects under the Domestic Violence (DV) Bonus and limit the invitation of new project applications under Bonus funds to existing projects seeking expansion under NOFA criteria.**

**DV Bonus:** The HUD CoC Committee recommends encouraging applications targeting Domestic Violence survivors under HUD's addition of $50 million in DV bonus funds to provide housing and services to survivors of domestic violence, dating violence, sexual assault and stalking. This new opportunity, which allows CoCs to create up to three new projects targeting DV survivors may allow our CoC to gain points, increase funding, and strengthening our Coordinated Entry's system to better meet the need of DV, dating violence, sexual assault and stalking survivors.

**Bonus:** The Committee also recommends this year to limit the invitation of new projects under the Bonus funds to existing renewal projects seeking reallocation and expansion under the NOFA Expansion definition criteria on Page 17, including CoC program projects (new project application to expand current operations of a CoC funded renewal project) or non-CoC program
funded projects (an existing funded homeless project seeking CoC program funds). This strategy is intended to achieve HUD's expressed desire, to see projects fully occupied and expending funds as quickly as possible.

Recommendation 4: Utilize the 2017 Guiding Principles

The HUD CoC Committee reaffirmed the existing 2016/17 Guiding Principles, and added Principle #8, which was recommended at our February, 27th community meeting:

1. Maximize the resources available to community
2. Package submitted will align with HUD priorities to meet local needs
3. Prioritize ensuring existing residential capacity and housing stability is maintained systemwide
4. Keep the renewal process as simple as possible
5. Continue to emphasize project performance and the submission of projects that will meet HUD’s thresholds
6. Support individual projects seeking to reallocate or reclassify where relevant
7. Facilitate a clear, fair and transparent local process
8. Advocate locally and nationally to protect and fund projects that add value to our Continuum of Care and response to homelessness
FY 2018 CoC Program Competition Results--Alameda County HCD

EveryOne Home <info@everyonehome.org> Fri, Aug 31, 2018 at 4:33 PM
To: Riley Wilkerson <riley.wilkerson@acgov.org>, "Shek, Flora, CDA" <flora.shek@acgov.org>, Daniel CDA Scott <daniel.scott@acgov.org>

Dear Applicant,

Thank you for submitting your application to the 2018 NOFA round! After a thorough review by our NOFA Committee, we are releasing the final results of the Local competition. You may find the list attached, along with additional scoring details for your project(s). If you are a lead-grantee, please forward this information to your sub-grantees. If you have any other questions please feel free to contact us at: info@everyonehome.org.

Best,
EveryOne Home

4 attachments

- Appendix A 2018 HUD CoC NOFA Appeals Process Final 720180719.pdf
  125K
- Alameda County HCD.docx
  61K
- Com. Announcement Memo CoC NOFA 2018 Final.pdf
  138K
- 2018 R&R List 20180830.pdf
  153K
Below please find the scoring for the project above the table. If the project’s Total Points do not match the project’s Score, one or more criteria did not apply and therefore the score was pro-rated out of total possible points less than 100.

Agency: Alameda County HCD
Project: CES

*This project elected to keep the score awarded when previously submitting as a new/proposed project. If you would like to receive a copy of the point analysis from your original submission, feel free to contact us at: info@everyonehome.org

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<thead>
<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
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Total Score: 69.6
Percentage: 69.6%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Agency: Alameda County HCD

### Project: Alameda County Shelter Plus Care - HOPE Housing

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Total Score: 83  
Percentage: 90.22%

Note: The Award Amount for this grant was reduced by $97,000.00. **The New Award Amount is $390,069.00.** Grant reduced by last year’s underspending. Left 1/12th (8%) of grant for cushion. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Agency: Alameda County HCD

**Project:** Alameda County Shelter Plus Care - TRA

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**Total Score:** 88.00  
**Percentage:** 88.17%

This project's scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - HOST

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Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - Lorenzo Creek

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Total Score: 91
Percentage: 90.83%

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Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - PRA

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<th>HMIS Data Quality</th>
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Total Score: 86.60
Percentage: 87%
This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD
Project: Alameda County Shelter Plus Care - SRA

<table>
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<th>Target Populations</th>
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<th>Resubmission Scores</th>
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<th>Rptrs &amp; invoicing</th>
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Total Score: 87
Percentage: 86.67%

Note: The Award Amount for this grant was reduced by $342,413.00. The New Award Amount is $1,314,975.00. Consistently underspent by 26-29% over last 3 grant years. Reduction amount is lowest underspent of 3 years. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care – SRO

<table>
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<th>Target Populations</th>
<th>Housing 1st Doc</th>
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<th>Rpts &amp; Invoicing</th>
<th>Capacity &amp; Utilization</th>
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Total Score: 88
Percentage: 87.67%

Note: The Award Amount for this grant was reduced by $167,651.00. The New Award Amount is $627,313.00. Site-based Project with general pattern of underspending grant by 30% over last 3 grant years. Reduction amount is lowest unspent of 3 years. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Agency: Alameda County HCD

### Project: Alameda Point Permanent

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<th>Target Populations</th>
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Total Score: 93  
Percentage: 92.50%

This project's scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: APC – Multi Service Center

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<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
<th>Outcome B</th>
<th>Outcome C</th>
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Total Score: 83
Percentage: 83%

This project's scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Project: Banyan House

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<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
<th>Outcome B</th>
<th>Outcome C</th>
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<th>Resubmission Scores</th>
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<th>Rpts &amp; Invoicing</th>
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</table>

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Homes for Wellness

*This project elected to keep the score awarded when previously submitting as a new/proposed project. If you would like to receive a copy of the point analysis from your original submission, feel free to contact us at: info@everyonehome.org

<table>
<thead>
<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
<th>Outcome B</th>
<th>Outcome C</th>
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<th>Outcomes Total</th>
<th>Resubmission Scores</th>
<th>Outcomes Final</th>
<th>Rprts &amp; Invoicing</th>
<th>Capacity &amp; Utilization</th>
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<th>HMIS Data Quality</th>
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<th>Cost Effectiveness</th>
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Total Score: 83.29  
Percentage: 83.29%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Agency: Alameda County HCD

**Project:** InHouse (HMIS)

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<th>Target Populations</th>
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**Total Score:** 82  
**Percentage:** 91.11%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Lorenzo Creek SHP

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<th>Target Populations</th>
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<th>Outcome A</th>
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<th>Rprts &amp; Invoicing</th>
<th>Capacity &amp; Utilization</th>
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Total Score: 89
Percentage: 88.50%

Note: The Award Amount for this grant was reduced by $8,419.00. The New Award Amount is $77,369.00. Consistently underspent grant. Site-based Project with fluctuation in needs for services. Reduction amount is lowest unspent of 3 years. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
**Agency:** Alameda County HCD

**Project:** Reciprocal Integrated Services for Empowerment (RISE) Project

<table>
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<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
<th>Outcome B</th>
<th>Outcome C</th>
<th>Outcome D</th>
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**Total Score:** 91  
**Percentage:** 91.17%  

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Southern Alameda County Housing/Jobs Linkages Program

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<th>Target Populations</th>
<th>Housing 1st Doc</th>
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Total Points: 79
Percentage: 85.87%

Note: The Award Amount for this grant was reduced by $140,000.00. **The New Award Amount is $1,359,466.00.** Grant reduced by last year’s underspending. Left 1/12th (8%) of grant for cushion. If you have any questions, please feel free to contact us at: info@everyonehome.org
Agency: Alameda County HCD

Project: Tri-City FESCO Bridgeway Apartments

<table>
<thead>
<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
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Total Points: 88
Percentage: 88.33%
## Project: Welcome Home

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<th>Housing 1st Doc</th>
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<th>Outcome B</th>
<th>Outcome C</th>
<th>Outcome D</th>
<th>Outcomes Total</th>
<th>Resubmission Scores</th>
<th>Outcomes Final</th>
<th>Rprts &amp; invoicing</th>
<th>Capacity &amp; Utilization</th>
<th>Client Eligibility</th>
<th>HMIS Data Quality</th>
<th>Fiscal Management</th>
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Agency: Alameda County HCD
Project: Welcome Home San Leandro

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Total Points: 89

Percentage: 88.50%
Below please find the scoring for the project above the table. If the project’s Total Points do not match the project’s Score, one or more criteria did not apply and therefore the score was pro-rated out of total possible points less than 100.

Agency: Alameda County HCD
Project: Spirit of Hope 1

*This project elected to keep the score awarded when previously submitting as a new/proposed project. If you would like to receive a copy of the point analysis from your original submission, feel free to contact us at: info@everyonehome.org

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<tr>
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Total Score: 86
Percentage: 89.93

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
HUD CoC NOFA

2018 Hud CoC NOFA Materials

8/13/18 — Given the Strategic Direction provided by the HUD CoC Committee to encourage applications for the 2018 NOFA DV Bonus projects and the unanticipated challenges and complexity in applying for these new projects, the NOFA Committee has determined to extend the deadline for all new DV Bonus project applications through August 21st at noon. The August 17th deadline for renewal and all other new projects (not DV Bonus) has not changed.

EveryOne Home held the 2018 HUD CoC NOFA Bidders’ Conference for the Local Competition on Friday, July 20th. In addition to releasing NOFA timelines and Local Competition’s instructions for renewal and new projects, ECH staff will provide further debriefing from the 2017 scores; a brief analysis on the CoC’s strengths and challenges; and this year’s NOFA highlights and opportunities to apply for new projects:

- 2018 New and Renewal Process Update Final
- 2018 NOFA Timeline Highlights Bidders’ Conference
- 2018 CoC Program Competition NOFA What’s New, Changes, and Highlights
- Joint TH & PH RRH Summary

2018 APPLICATIONS

- Renewal Application
- New Application
- HMIS Application

Appendix A 2018 HUD CoC NOFA Appeals Process
Appendix B 2018 Housing First Checklist
Appendix C 2018 Calculating Performance and Target Populations—updated 8/7
Frequently Asked Questions 7/27
Frequently Asked Questions 8/3
2018 HUD CoC NOFA is out!

The HUD CoC Notice of Funding Availability (NOFA) for the 2018 Continuum of Care (CoC) Program Competition was released today by the US Department of Housing and Urban Development (HUD) and is now open. The competition will close Tuesday, September 18, 2018. Click here to review the Notice and find out more guidance from HUD. We encourage you to review this year’s NOFA, including its resources link FY 2018 Continuum of Care (CoC) Program Competition What’s New, Changes, and Highlights. Please share the Notice with anyone who may be interested in applying this year!

EveryOne Home, as Alameda County’s Continuum of Care Lead, will facilitate the local funding application process, conduct the rating and ranking of applicant projects, and write and submit the Consolidated Application to HUD in partnership with Alameda County Housing and Community Development (HCD).

Within the next weeks, we will be sending an email to current and prospective grantees specific information related to this NOFA, NOFA Timelines and next steps – as we continue to move forward with this year’s Competition. Make sure you are on our email list by registering here.

2018 Renewal’s Project Evaluation Preliminary Scores Package Memo

Thank you for working with us on completing the first stage of the 2018 NOFA Local Renewal and New Projects Review Process. Please see the memo below:

2018 NOFA Renewal’s Project Evaluation Preliminary Scores and Next Steps

2018 NOFA Local Review Process Renewals’ Project Evaluation Package

Please download the Project Evaluation Instructions and Form below. Review the Instructions located on pages i-v of the EveryOne Home Instructions and Evaluation Form carefully. The Cover Sheet for each Project has been emailed to the specific NOFA grantee.
MEMORANDUM OF UNDERSTANDING
BETWEEN
ALAMEDA COUNTY HUD CONTINUUM OF CARE
COMMITTEE, (ACTING AS THE CONTINUUM OF CARE
BOARD) AND
ALAMEDA COUNTY DEPARTMENT OF HOUSING AND
COMMUNITY DEVELOPMENT, (ACTING AS THE
HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS) LEAD

I. Introduction and Purpose
The Alameda County Continuum of Care (the “CoC”) is the governing body organized to carry out the
responsibilities required under HUD’s Homeless Emergency Assistance and Rapid Transition to
Housing Continuum of Care Program Interim Final Rule at 24 CFR Part 578.7(b) (the “Interim Rule”),
including designating a Homeless Management Information System (HMIS) lead to operate HMIS. In
addition, the CoC is responsible for making decisions about HMIS management and administration as
required under 24 CFR Part 580, a separate rule establishing regulations for HMIS issued by HUD as
part of the implementation of the HEARTH Act of 2009. The CoC is responsible for ensuring that the
HMIS is operated in accordance with the provisions of the new regulations and other applicable laws
(24 CFR Part 580.5).

The Alameda CoC is part of EveryOne Home, a collective impact effort to end homelessness. It is
composed of representatives of organizations including nonprofit homeless providers, victim service
providers, faith-based organizations, governments, businesses, advocates, public housing agencies,
school districts, social service providers, mental health agencies, hospitals, universities, affordable
housing developers, law enforcement, organizations that serve homeless and formerly homeless
veterans, and homeless and formerly homeless persons. The HUD Continuum of Care Committee
(the “CoC Board”) functions as the Alameda County CoC Board, required by the Interim Rule to act on
behalf of the membership to ensure the CoC responsibilities are fulfilled.

The CoC relies upon data collected in the HMIS to understand the extent and nature of homelessness,
and how well the system is working to address it, and to report system and project performance to
HUD. If implemented well, the HMIS should also support the operation of the housing and service
system, including the CoC’s coordinated entry. Under HUD mandates, the CoC must designate a
single information system as the official HMIS software for the geographic area, and an HMIS Lead,
an entity designated to operate the HMIS (24 CFR Part 580.7). While the CoC must review, revise and
approve all policies and plans the HMIS Lead is required to develop, the HMIS Lead must develop
written policies and procedures for all Covered Homeless Organizations (CHOs), serve as the
applicant to HUD for any HMIS grants, and monitor compliance by all CHO of the CoC (24 CFR Part
580.9)

Because managing the HMIS is a shared responsibility between the CoC and the HMIS Lead,
expectations around each entity’s role must be agreed to and clearly documented, along with any
role envisioned for the CoC Board and CoC Lead agency in its relationship to the HMIS.

This MOU describes in detail the roles, responsibilities, and accountability that guide the
cooperation for the Alameda County Homeless Management Information System (HMIS) among
the Parties described below, consistent with the Alameda County Continuum of Care/EveryOne Home Governance Charter approved in October of 2017 and 24 CFR Parts 578 and 580.

II. Parties to this Memorandum of Understanding:

1. The Continuum of Care Board ("CoC Board"): HUD Continuum of Care Committee

   The Alameda County CoC has designated the HUD Continuum of Care Committee (HUD CoC) to function as the CoC Board. The CoC Board is required by the Interim Rule, and acts on behalf of the membership to ensure the CoC responsibilities are fulfilled. The CoC is responsible for "ensuring that the HMIS for the Continuum of Care is operated in accordance with the provisions of the new regulations and other applicable laws. (24 CFR Part 580.5).

   The CoC Committee, acting as the CoC Board, may designate an organization to act on its behalf and/or provide staff support. That entity, identified as the CoC Lead, may undertake the activities of the CoC specified in this MOU.

2. The Homeless Management Information System Lead ("HMIS Lead"): Alameda County Department of Housing and Community Development (HCD)

   The Alameda County CoC has designated the Alameda County Department of Housing and Community Development Department as the HMIS Lead to operate the HMIS as required under 24 CFR Part 580.7, for assuring the CoC is compliant with all applicable HUD rules and regulations. HCD administers the HMIS funds provided by the CoC funding as well as the local match.

III. Roles and Responsibilities of Parties

   A. Roles and responsibilities of the HUD Continuum of Care Committee (CoC Board) with respect to HMIS:

      1. Act on behalf of the membership to ensure HMIS is administered in compliance with HUD CoC regulations.

      2. Designate a single Homeless Management Information System (HMIS) for the geographical area (24 CFR Part 578.7(b)(1) and 24 CFR Part 580.5

      3. "Designate an eligible applicant to manage the Continuum’s HMIS, which will be known as the HMIS Lead." (24 CFR Part 578.7(b)(2).

      4. "Review, revise and approve the policies and plans required by this part and by any notices issued from time to time (24 CFR Part 580.7),” including but not limited to a privacy plan, security plan, and data quality plan for the HMIS (24 CFR Part 578.7(b)(3).

      5. "Ensure consistent participation of recipients and subrecipients in the HMIS.” (24 CFR Part 578.7(b)(4).

      6. Analyze and approve the annual review of the HMIS system’s performance and functionality, using HMIS work-plan to measure progress.

   B. Roles and Responsibilities of Alameda County Housing and Community Development as HMIS Lead Agency (HMIS Lead):

      1. As per 24 CFR 580.9(a), the HMIS lead must ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include
establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if
needed, to ensure that the HMIS is compliant with the requirements of this part.

2. Develop written HMIS policies and procedures in accordance with § 580.31 for all Covered
Homeless Organizations (CHOs) (24 CFR Part 580.9).

3. Execute a written HMIS Participation Agreement with each CHO, which includes the obligations
and authority of the HMIS Lead and CHO (24 CFR Part 580.9), the requirements of the security
plan with which the CHO must abide (24 CFR Parts 580.31), the requirements of the privacy
policy with which the CHO must abide, the sanctions for violating the HMIS Participation
Agreement (e.g., imposing a financial penalty, requiring completion of standardized or
specialized training, suspending or revoking user licenses, suspending or revoking system
privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the
CHO will process Protected Identifying Information consistent with the agreement. The HMIS
Participation Agreement may address other activities to meet local needs. (24 CFR Part 580.9).

4. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum
of Care’s geographic area (24 CFR Part 580.9), as directed by the Continuum, and, if selected
for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved
activities.

5. Monitor and enforce compliance by all CHOs with the requirements of this part and report on
compliance to the Continuum of Care and HUD.

6. The HMIS Lead must submit a security plan (see § 580.35), a data quality plan (see § 580.37),
and a privacy policy (see § 580.31(g)) to the Continuum of Care for approval within [the date
that is 6 months after the effective date of the final rule to be inserted at final rule stage] and
within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must
review and update the plans and policy at least annually. During this process, the HMIS Lead
must seek and incorporate feedback from the Continuum of Care and CHO. The HMIS Lead
must implement the plans and policy within 6 months of the date of approval by the
Continuum of Care.

7. Provide staffing for HMIS.

8. Provide standard and customized reports, and technical support, as applicable and requested
by participating agencies in accordance with the mutually adopted customization policy.

9. Develop and implement HMIS-related training for end users, including regular Privacy and
Security training and software training. Develop written procedures and job aides for users.

10. Review data quality monthly and take necessary actions per mutually adopted data quality
assurance policy to maintain input of high-quality data from all HMIS-utilizing agencies. Report
to the COC Committee on data quality and quality assurance activities on a quarterly basis.

11. Solicit HMIS user feedback through using a variety of mechanisms, such as on-line forums,
surveys and user groups, such as the HMIS User Group. The User Group will work with the
HMIS Lead to: 1) Provide recommendations on use of software and software enhancements; 2)
Troubleshoot frequent data quality errors; 3) Recommend modifications to HMIS staff created
reports; and 4) improve coordinated entry workflow.

12. To the extent possible, ensure that CoC projects using an alternate data collection system
(such as Domestic Violence providers) are compliant with maintaining a “comparable
database” and collecting the necessary HMIS data elements.
13. Generate reports on HMIS data and additional data available to present results to HUD CoC Committee for gap analysis. Configure and maintain the HMIS to be an effective performance management system that is capable of measuring progress in meeting the system and project performance measures established through the EveryOne Home’s Results Based Accountability (RBA) Committee.

14. Develop an effective communication plan to reach all HMIS participants to communicate changes to policy and procedures.

15. Develop an annual work plan for the HMIS System for review and final approval by HUD CoC. The annual work plan will be presented along with the HMIS budget proposal to the Board of Supervisors, including costs and funding sources.

C. Joint Responsibilities of the HUD CoC Committee (CoC Board) and Alameda County Housing and Community Development (HMIS Lead)

1. Participate in the HUD Continuum of Care Committee, and its HMIS-related sub-committees, including the HMIS Oversight Subcommittee.

2. Support the implementation of, and compliance with local HMIS policies such as, data quality and security, participation, and customization.

3. Collaborate to design and modify the configuration of HMIS projects, such that it meets program reporting and system analysis needs.

4. Participate in the EveryOne Home Results Based Accountability (RBA) Committee in using the HMIS to develop system performance measures, data dashboards, and other analytical tools that follow HUD HMIS standards and meet community needs.

5. Analyze system and programmatic data for trends, costs, performance, compliance, and progress on the Alameda CoC Plan to End Homelessness.

6. Work collaboratively with other committees in analyzing annual reports from HMIS, including the Longitudinal Analysis report (formerly AHAR), System Performance Measures, PIT Count, and HIC chart.

7. Establish the HMIS Oversight Subcommittee, that will act as a liaison between the HUD CoC Committee and the HMIS Lead Agency, with the following responsibilities:
   a. Review data quality reports and recommend a quality improvement program to the HUD CoC.
   b. Ensure compliance with federal requirements.
   c. Support and protect the rights and privacy of service users.
   d. Recommend to the HUD CoC a policy and set of procedures that will guide decisions about customization including establishing: A) a process through which a Contributing HMIS Organization (CHO) may request that project configuration, custom data collection fields, and/or assessments be built into the HMIS; B) the criteria upon which those requests are evaluated; and C) guidance for CHOIs to appropriately manage requests for custom data collection fields and assessments.
   e. Collaborate with the HMIS lead on all HMIS policies the HMIS Lead is required to develop, including Privacy, Security, and Data Quality Plans as required by federal
8. Review data quality reports and take appropriate action to ensure accountability and improved performance of CHOs and system per approved policies.

9. Conduct an annual review of the HMIS system's performance and functionality, using HMIS work-plan to measure progress. Criteria will be discussed with HMIS Lead.

10. Revisit license users' policies and collaborate when additional funding is needed to expand programs and users.

IV. DURATION AND RENEWAL

1. Except as provided in the TERMINATION section, the duration of the MOU shall be for an initial five-year term from June 6, 2018, through June 6, 2023.

2. This agreement may be renewed by written agreement of both parties.

V. AMENDMENTS/NOTICES

The MOU may be amended in writing by the parties and is in effect upon signature of all parties. Notices shall be mailed, emailed or delivered to:

1. Chair of the HUD CoC Committee
2. Director of Alameda County Department of Housing and Community Development

VI. TERMINATION

Any party may terminate this MOU at a date prior to the renewal date specified in the MOU by giving 120 days written notice to the other party. The termination shall be effective on the date specified in the notice of termination.

In addition, if any of the Parties to this Memorandum of Understanding shall fail to fulfill in a timely and proper manner its obligations under this agreement, or if the Parties shall violate any of the covenants, agreements, or stipulations of this agreement, any of the Parties shall thereupon have the right to terminate this agreement by giving written notice of such termination and specifying the effective date thereof, which shall be at least 120 days before the effective date of such termination.

Signatures:

[Signatures]

Chair, HUD CoC Committee, on behalf of the Alameda County Continuum of Care (CoC Board Director, Alameda County of Housing and Community Development (HMIS Lead)

[Dates]
Alameda Countywide
Homeless Continuum of Care Council
InHOUSE Policies and Procedures Manual
Alameda Countywide Homeless Continuum
of Care Council
Policies and Procedures
for the
InHOUSE System

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1.0 InHOUSE Partner MOU:

Policy:

Each participating agency/jurisdiction must have a signed Memorandum of Understanding (MOU) with the Alameda Countywide Homeless Continuum of Care Council to use the InHOUSE system and must be compliant with the terms of the MOU to continue use of InHOUSE.

Procedure:
A. Each participating agency/jurisdiction will be given two copies of the InHOUSE Partner MOU by the Council staff for signature.
B. The participating agency/jurisdiction will sign and return both copies of the MOU to the Council.
C. Council Staff will sign the MOU, retain one signed MOU and return the second copy to the agency/jurisdiction.
   See Appendix A.

1.1 Privacy Agreement:

Policy:

A Privacy Agreement must be signed by each agency/jurisdiction staff who will handle client data intended for or generated by the InHOUSE system prior to collecting or handling client data. The Privacy Agreement lists the privacy and confidentiality provisions to abide by.

Procedure:
A. Each participating agency/jurisdiction will provide Council staff with the names of their identified staff requiring certification and Privacy Agreements.
B. Each participating agency/jurisdiction’s staff will be given a Privacy Agreement for signature at the Privacy and Security Certification Training.
   See Appendix B.
1.2 User Agreement:

Policy:

A User Agreement must be signed by each InHOUSE system user prior to a license being issued to that user and the terms of use must be adhered to in order to retain user access and rights.

Procedure:

A. Each participating agency/jurisdiction will provide Council staff with the names of their identified system users requiring licensed access.

B. Each participating agency/jurisdiction will be given a User Agreement for each of its InHOUSE system users by the Council staff for signature.

C. Council Staff will retain the original User Agreements and copies will be provided to the agency/jurisdiction.

D. Licensed access to the InHOUSE system will be granted after receipt of the User Agreement and completion of both Privacy and Security Certification Training and User Training.

See Appendix C.
Participating Agency/Jurisdiction:

2.0 Roles and Responsibilities:

Policy:

Each participating agency/jurisdiction is responsible for developing and maintaining an internal infrastructure to support and monitor their agency and users’ adherence to the Governing Principles and Policies and Procedures of the Countywide InHOUSE system.

Procedure:

A. Each participating agency/jurisdiction will identify an InHOUSE “Manager” who will hold final responsibility for the adherence of his/her agency’s/jurisdiction’s personnel to the Governing Principles, and Policies and Procedures outlined in this document.

B. Each participating agency/jurisdiction will identify personnel to fulfill the following roles for implementation and maintenance of the InHOUSE system. The roles may be re-assigned to more or fewer than four individuals.

**Implementation Team Leader** (role de-activated after implementation)

1. Lead agency contact with InHOUSE Implementation Project Manager.
2. Responsible for insuring HMIS is fully implemented in their agency.
3. Insures all tasks for three roles listed below are completed in a timely manner as specified.
4. Must attend all Implementation Team meetings or to debrief and strategize regularly with three team members listed below.

**Implementation Specialist** (role de-activated after implementation)

1. Data collection needs-related contact person for InHOUSE Countywide Project Manager.
2. Communicate about the services and reporting requirements of agency for incorporation into the InHOUSE system.
3. Make recommendations about data elements and pick lists.
4. Shop ideas and discuss decisions back at the agency and build buy-in for the system and decisions made in InHOUSE Implementation meetings.
Policies and Procedures Administrator

2. Maintain current InHOUSE-related files, including Privacy and User Agreements and InHOUSE Partner MOU.
3. Conduct one-on-one Privacy and Security Certification Training as needed.
4. Maintain compliance with confidentiality policies.
5. Respond to end-user system questions.

Technical Administrator

1. Add users to agency system.
2. Setup/monitor password screensavers.
3. Monitor end user workstation security.
5. Maintain and update firewalls and virus protection on agency computer system/network.
6. Maintain system software updates on end user workstations.
7. Manage digital certificates.
8. Respond to end-user system questions.
9. Work with InHOUSE System Administrator on unresolved software issues.
10. Work with InHOUSE System Administrator when Administrative system changes are requested by Agency.
11. Add/Update Agency & Program I&R.
12. Run Provider Reports.
13. Create Custom Reports.
15. Audit User Reports.

Note: Must be able to perform all client/services/shelter software functions at agency level.
2.0 Roles and Responsibilities: (continued)

**InHOUSE Manager** (begins after agency/jurisdiction’s implementation)

1. Lead contact for the InHOUSE System Administrator.

2. Responsible for insuring InHOUSE is properly utilized and in compliance in their agency.

3. Responsible for insuring that his/her agency’s/jurisdiction’s personnel adhere to the Governing Principles and Policies and Procedures outlined in this document.

4. Respond to questions from Technical Administrator and Policy and Procedures Administrator.

5. Oversee and monitor the ongoing tasks of the Technical Administrator and Policy and Procedures Administrator.

6. Represent agency/jurisdiction at periodic InHOUSE user meetings.

7. Bring ideas, concerns and issues to periodic InHOUSE user meetings to facilitate enhancements and improvements to the system.

8. Conduct one-on-one Privacy and Security Certification Training as needed.
2.1 Access to Internet:

Policy:

Each participating agency/jurisdiction is responsible for maintaining their agency's/jurisdiction's Internet Connection and troubleshooting any problems with the connection.

2.2 Privacy Requirements:

Policy:

Each participating agency/jurisdiction must comply with the HMIS Privacy Standards 4.1 through 5.2.1 described in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice, including all Baseline Requirements and with Additional Privacy Protections specified by the InHOUSE Policies and Procedures manual.

Each participating agency/jurisdiction will document all baseline privacy requirements and all additional privacy protections in its Privacy Notice document.

Procedure:

A. Each participating agency/jurisdiction will document and publish a Privacy Notice describing its policies and practices for the processing of Protected Personal Identifiers (PPI). This notice must include all baseline privacy protections and all additional privacy protections.

B. If the agency/jurisdiction has a website, a copy of the Privacy Notice document will be posted on that website.

C. Agency/jurisdiction must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (annually or otherwise) a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.
2.2 Privacy Requirements: (continued)

Baseline Requirements:

All baseline privacy requirements described in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice are included in full text and summary in Appendix C and Appendix D of this manual.

Additional Privacy Protections:

Collection Limitation
1. PPI will only be collected with the knowledge or consent of the individual (unless required by law).
2. Written consent will be obtained from the individual for the collections of personal information from the individual or from a third party.

Purpose Specifications and Use Limitation
1. Users and agency/jurisdiction agree to additional restrictions on use or disclosure of an individual’s PPI at the request of the individual if the request is reasonable. The agency/jurisdiction is bound by this agreement except if inconsistent with legal requirements.

Access and Correction
1. Client appeals of a denial of access to or correction(s) of collected data will be accepted. Each participating agency/jurisdiction will adopt its own appeal procedure and describe the procedure in its Privacy Notice.
2. The agency/jurisdiction will provide to any individual appealing an access or correction decision a written explanation of the reason(s) for the denial.

Accountability
1. Each member of agency/jurisdiction staff (including employees, volunteers, affiliates, contractors and associates) of a participating agency/jurisdiction will undergo (annually or otherwise) formal training in privacy requirements.
2. Each participating agency/jurisdiction will establish a method, such as an internal audit, for regularly reviewing compliance with its privacy policy.
3. Each participating agency/jurisdiction will establish an internal appeal process for hearing an appeal of a privacy complaint or an appeal of a denial of access or corrections rights.
2.3 Notification of Privacy Protections:

Policy:

Each participating agency/jurisdiction will document all privacy protections in its Privacy Notice document.

Procedure:

A. Each participating agency/jurisdiction will document and publish a Privacy Notice describing its policies and practices for the processing of Protected Personal Identifiers (PPI). This notice must include all the above listed additional privacy protections in its published Privacy Notice.

B. The Council has a sample privacy notice that describes the data uses and system-wide privacy protections for non-HIPAA covered entities. Agencies/jurisdictions may customize this sample, adding in the agency name and any additional uses or protections specific to the agency/jurisdiction.

C. If the agency/jurisdiction has a website, a copy of the Privacy Notice document must be posted on that website.

D. Agency/jurisdiction must post a sign stating the availability of its privacy notice to any individual who requests a copy. The Council has prepared a sample of this signage.

E. Each participating agency/jurisdiction will establish or modify all necessary internal or external processes required to accommodate all the above listed additional privacy protections.

F. HIPAA-covered entities should review their current Privacy Notice to ensure it accurately discloses the collection and use of data for InHOUSE.

G. Further guidance from CoC will be forthcoming as it becomes available regarding InHOUSE implementation specific to HIPAA-covered entities.
Participating Agency/Jurisdiction:

2.4 Notice to Clients of Participation in InHOUSE:

Policy:

Clients of each agency/jurisdiction participating in the InHOUSE system will be informed by a posted notice of the agency's/jurisdiction's participation.

Procedure:
A. Each participating agency/jurisdiction will post a notice in full view of clients in the offices where intake occurs.
B. The size of the notice must compete favorably with others posters and notices in the intake office.
C. Disclosure of the agency's/jurisdiction's participation in the Alameda County InHOUSE system may be added to the 4.2.1 Collection Limitation sign template identified in the HUD HMIS Final Standards. The Council has prepared a sample of this signage.
D. When administration of an intake occurs in an off-site location (e.g. the home of a participant), the client must be given a copy of the agency/jurisdiction’s Privacy Notice in addition to the “What is INHOUSE?” form distributed while seeking consent for the Release of Information.

2.5 Need-based Access:

Policy:

Access to the InHOUSE system will be based on need. Need exists only for staff who work directly with (or supervise staff who work directly with) clients or have data entry or data reporting responsibilities. Appropriate license access levels will correspond to staff’s need and use of data.

Procedure:
A. Each participating agency/jurisdiction will identify the specific staff members to obtain licensed access to the InHOUSE system based on this policy and assist the InHOUSE System Administrator in determining appropriate level of access.
2.6 Access Privileges to InHOUSE Software:

Policy:

Each participating agency/jurisdiction staff member must be trained in both privacy and security procedures, and in specific software use to obtain licensed access to the InHOUSE system. Licensed access to the InHOUSE system may never be “shared” with another individual.

Procedure:

A. Each participating agency/jurisdiction will identify the specific staff members to obtain licensed access to the InHOUSE system.

B. Each identified member must successfully complete the following:
   1. InHOUSE Privacy and Security Certification training.
   2. Agree to all provisions of use by reading and signing the InHOUSE Privacy Agreement. (See Appendix B)
   3. Agree to all provisions of use by reading and signing the InHOUSE User Agreement. (See Appendix C)
   4. ServicePoint User Training or InHOUSE agency administrator training.

C. Each user will create and maintain an independent and private password which will not be disclosed to anyone.
Participating Agency/Jurisdiction:

2.7 Breach of Confidentiality and/or Security:

Policy:

A breach of confidentiality and/or security by any agency/jurisdiction participant in the InHOUSE system will result in consequences up to and including termination of user rights and, potentially, termination of employment. An agency/jurisdiction that is found to have consistently and/or flagrantly violated confidentiality and/or security protocols may have their access privileges suspended or revoked.

Procedure:

A. Agency/Jurisdiction will notify InHOUSE System Administrator within three (3) business days of any identified breach of security.

B. InHOUSE System Administrator will review agency/jurisdiction data and discuss the situation with the agency/jurisdiction within three (3) business days. In addition, the InHOUSE System Administrator will inform designated CoC staff about the issue and convey the relative seriousness of the breach.

C. Based on the seriousness of the breach of security and/or confidentiality, CoC staff will recommend an appropriate intervention to the Executive Committee of the Council.

D. The Executive Committee of the Council, or a designated special committee of the Executive Committee, will decide whether a downgrading of system access, loss of user privileges, or other intervention is necessary.

E. Appeals may be made to the Executive Committee of the Council or a designated special committee of the Executive Committee.

F. Agency/jurisdiction is expected to make decisions about disciplinary action, up to and including termination, in accordance with agency/jurisdiction policies and values.

G. The InHOUSE System Administrator will monitor access logs regularly and report suspicious activity to the designated CoC staff person and agency/jurisdiction InHOUSE Manager.
2.8 Revocation or Revision of Access Privileges:

Policy:

Other violations of system use protocols (other than breaches of confidentiality and/or security) may warrant revocation of user privileges, downgrading of access, and/or disciplinary action of specific end users by the agency/jurisdiction.

Procedure:

A. Agencies/jurisdictions should undertake disciplinary action with employees as appropriate and in accordance with agency/jurisdictional policies.

B. Agencies/jurisdictions must notify the InHOUSE System Administrator with information about any violation(s) of the policies and procedures set forth in this document or any signed MOUs and/or signed InHOUSE forms within three (3) business days of the identified incident(s) of misuse or abuse of InHOUSE privileges.

C. The InHOUSE System Administrator will monitor access logs and other system information regularly and report suspicious activity to the designated CoC staff person and agency/jurisdiction InHOUSE Manager.

D. Once notified by agency/jurisdiction of a violation, CoC staff will respond within fifteen (15) working days with appropriate discussions and/or intervention steps. Possible intervention steps, depending on the severity of the violation, include revocation of user privileges or downgrading of access rights.

E. All sanctions are imposed by the agency/jurisdiction and/or the Council’s Executive Committee or a special committee of the Executive Committee (such as the System Grievance and Security Committee, see Section 10.1).

F. All sanctions imposed by the agency/jurisdiction can be appealed to the CoC Executive Committee or a special committee of the Executive Committee (such as the System Grievance and Security Committee, see Section 10.1).

G. All sanctions imposed by the CoC Executive Committee or its designee following the disposition of the appeal are final and binding.
2.9 Participant Data:

Policy:

HUD prohibits predicing access and utilization of services on consent for entry into the HMIS. However, funders of certain programs may require that data be collected and electronically entered and maintained in order to provide services. CoC acknowledges this conundrum and lays out the following procedures to accommodate this discrepancy in the guidelines for some programs.

Agency/jurisdiction may collect and store Client data in InHOUSE without express written consent providing the following are completed:

- the data is stored within InHOUSE such that it is inaccessible to other agencies,
- appropriate disclosure is included in the agency/jurisdiction’s Privacy Notice, and
- clients receive and initial for receipt of the “What Is InHOUSE?” form.
2.10 Quarterly Compliance Review:

Policy:

Each participating agency/jurisdiction will conduct a quarterly monitoring to review adherence to the Governing Principles and Policies and Procedures of the Countywide InHOUSE system. A plan must be developed to correct any problems that are identified. Council staff or designees will periodically review participating agency/jurisdiction’s quarterly monitoring to ensure system-wide compliance and adherence to Governing Principles and Policies and Procedures of the Countywide InHOUSE system.

Procedure:

A. Agency/jurisdiction’s quarterly monitoring will review privacy/confidentiality, data quality, and security, as follows:

1. Privacy/Confidentiality
   a) The agency/jurisdiction must review dataflow to insure all Privacy and Security requirements are met in obtaining and entering client data.

2. Data Quality
   a) Review system reports on completeness of required data.
   b) Determine that all definitions are being applied uniformly.

3. Security
   a) Review if all workstations are being updated regularly for virus protection.
   b) Review if system firewall is regularly updated
   c) Review handling of hardcopy versions of client data.
   d) Review disposal procedures (hard and soft copy) of client data.
Client Rights:

3.0 Decision to Participate:

Policy:

Clients have the right to specify if their personal information from the Standardized Intake may be shared in the InHOUSE system. Clients can not be refused services if they choose not to share the Intake in InHOUSE.

Procedure:

A. Each participating agency/jurisdiction will post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. The language of the sign should read:

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

B. Each participating agency/jurisdiction will provide a copy of its Privacy Notice document to any individual upon request.

C. Clients will be informed both verbally and in writing about what information is being collected and how the information will be used.

D. Clients will be informed both verbally and in writing about their options for participation in InHOUSE.

E. Clients will initial on the “Client Release of Information Authorization” to acknowledge receipt of the “What is InHOUSE?” form following the verbal explanation. The “What is InHOUSE?” form will be given to the client.

F. If a client chooses to share Intake data, the client will sign the “Client Release of Information Authorization” form. This form must be “witnessed” in writing by an agency/jurisdiction representative.

G. If a Client chooses to not share Intake data, the “Consent” section of the “Client Release of Information Authorization” form is not signed. All collected data may be entered into InHOUSE, but must be secured appropriately to forbid any sharing. Client may not be denied services based on that choice.

H. Client information may only be searched for or entered in the InHOUSE system AFTER the client has been informed of data collection and use, the option for data sharing, and presented the “What is InHOUSE?” form.
I. Reasonable accommodations will be made with regards to the Privacy Notice, release of information forms and posted signs for persons with disabilities and non-English speaking clients as required by law.

3.1 Client Revisions to Participation:

Policy:

Clients have the right to specify when and how their personal information in the InHOUSE system may be changed. Clients may revoke, revise, and/or amend their levels of data sharing at any time during the course of service use. Clients may not be refused services if they choose to modify their participation in InHOUSE.

Procedure:

A. Each participating agency/jurisdiction will complete a new Release of Information authorization form each time a Client asks to share his/her data in InHOUSE.

B. Each participating agency/jurisdiction will complete a Revocation of Consent form each time a Client requests to no longer share data in InHOUSE.

C. Agency/jurisdiction will modify Client ROI in InHOUSE within one (1) business day in accordance with Client’s revised authorization.
Client Rights:

3.2 Client Access to Personal Information:

Policy:

Clients have the right to inspect and to have a copy of their personal information which is stored in the InHOUSE system. Clients also have the right to request that information be corrected and/or updated.

Procedure:

A. Each participating agency/jurisdiction will, within five (5) workings days of request, allow the client to review their InHOUSE record.

B. At the reasonable written request of a client, each participating agency/jurisdiction will, within 5 working days, provide a printed “hard” copy of the client’s InHOUSE record.

C. The agency/jurisdiction must offer to explain any information that the client does not understand.

D. Each participating agency/jurisdiction must consider any request by a client for correction of inaccurate or incomplete personal information pertaining to that client.

E. An agency/jurisdiction is not required to remove any information but may mark information as client-identified as inaccurate or incomplete and may supplement data fields with additional information and/or explanations.

F. Each participating agency/jurisdiction must have in its Privacy Notice the specific conditions under which it may deny the inspection of or copying of a client’s record (upon that client's request) in InHOUSE.
3.3 Filing Client Grievances:

Policy:

Clients have the right to file a grievance for denial of access to or correction of data in the InHOUSE system, or if they believe their specific written release of information consent for the InHOUSE system has been violated.

Procedure:

A. Client files a grievance as specified in the agency/jurisdiction Privacy Notice.

B. Agency/jurisdiction must review all grievances at all levels identified in the Privacy Notice.

C. If client is unsatisfied with the resolution at the agency level, the client may request mediation at the system level. Within five (5) working days, a copy of the grievance is sent to the CoC staff member of the InHOUSE Grievance and Security Committee, who notifies and convenes the committee to review the grievance.

D. The InHOUSE Grievance and Security Committee as identified in Section 10.1 meets within ten (10) working days and sends written decision to the agency/jurisdiction and the client.
**InHOUSE License Administration:**

**4.0 Issuing of User Licenses:**

**Policy:**

The InHOUSE System Administrator will issue all initial agency/jurisdiction user licenses for system users. The agency/jurisdiction Technical Administrator will administer user IDs and passwords for the eligible user at agency/jurisdiction site(s).

**Procedure:**

A. Upon completion of a signed User Agreement and Privacy and Security Certification, a system user will be eligible to be issued a license.

B. The InHOUSE System Administrator will allocate a user access license and privileges to the user prior to InHOUSE hands-on system training.

**Passwords:**

1) First-time, temporary passwords are automatically generated by the InHOUSE system when a user is created. This temporary password must be changed the first time the user logs onto the system.

2) InHOUSE User IDs and first-time, temporary passwords will be transmitted in two separate emails to the user.

3) NO SUBSEQUENT ELECTRONIC TRANSMISSION OF AUTHENTICATORS (PASSWORDS OR USER NAMES) MAY TAKE PLACE.

4) Passwords selected by users to replace the first-time, temporary password must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:

   (a) Using at least one number and one letter;
   (b) Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and/or
   (c) Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

**Additional Licenses:**

1) If a participating agency/jurisdiction purchases additional user licenses to the InHOUSE system, the above outlined Procedures will be followed.

C. The agency/jurisdiction Technical Administrator will administer any changes in issued licenses and user IDs and passwords for eligible users at their site.
4.1 User Licenses:

Policy:

A User issued licensed access to the InHOUSE system may not share that access with any other person at any time. Sharing access is considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual.

4.2 Maintenance of User Licenses:

Policy:

Agency/jurisdictions’ InHOUSE Manager or Technical Administrator must notify the InHOUSE System Administrator upon termination or extended leave of absence of any licensed InHOUSE system user. User access will terminate at the end of business on their last day of employment or sooner if requested by the agency/jurisdiction InHOUSE Manager. If a licensed user is to go on leave for a period of longer than 45 days, their access will be inactivated within 5 business days of the start of their leave.

Procedure:

A. The agency/jurisdiction InHOUSE Manager or Technical Administrator will notify the InHOUSE System Administrator by both email and phone of any user termination or extended leave from employment in sufficient time to comply with the above stated policy.

B. Failure to make such notifications in the time required will be considered a breach of confidentiality and will be grounds for suspending and/or revoking access of the agency/jurisdiction to the InHOUSE system.

C. Such sanctions will be imposed by agency/jurisdiction and the Council’s Executive Committee.
Maintaining InHOUSE Security:

5.0 Tracking of Unauthorized Access:

Policy:

The agency/jurisdiction Technical Administrator will track system access logs and audit reports weekly. The Technical Administrator will immediately notify the agency/jurisdiction InHOUSE Manager and CoC staff of suspicious or inappropriate access.

Procedure:

A. Upon notification from the agency/jurisdiction Technical Administrator of suspicious or inappropriate access, the agency/jurisdiction InHOUSE Manager will investigate the specific situation and report back to the CoC staff in writing.

B. If an infraction of security did occur, the agency/jurisdiction InHOUSE Manager will provide CoC staff with a written plan for rectifying the infraction and monitoring against further such infractions.

C. Failure to respond to such CoC notification will result in downgrading of license access.

D. CoC staff will prepare a sample corrective plan showing a plan to rectify infractions and monitor against further infractions.
5.1 Unauthorized Remote Access:

Policy:
Access to the InHOUSE system is allowed only from authorized agency locations. Remote access (from an unauthorized agency location) to the InHOUSE system is not permitted under any circumstances. Such access is considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual. The InHOUSE System Administrator will monitor access of the InHOUSE system to ensure compliance with the access policy. Agencies/jurisdictions must monitor all staff to ensure such compliance.

Procedure:
A. In addition to the InHOUSE Privacy and Security Certification Training, the agency/jurisdiction shall make this policy and its consequences known to all licensed users.
B. If a breach of security occurs, the agency/jurisdiction InHOUSE Manager will provide CoC staff with a written notice and plan for rectifying the infraction and monitoring against further such infractions.
C. Agencies wishing to authorize remote workstations as a secure and compliant authorized agency location must submit a written request to the agency Technical Administrator who will physically inspect the remote workstation for security compliance as detailed in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice. If remote workstations comply with the security standards, the Technical Administrator will complete the Authorized Remote Access Form and submit it to the InHOUSE System Administrator.
D. An authorized remote site must be inspected by the Technical Administrator once a quarter to insure the firewall is functioning properly and the virus software is up to date. Each visit will be documented on an Authorized Remote Access Form and submitted to the InHOUSE System Administrator.
E. Council staff or its designee may monitor the remote access inspection records from the agency/jurisdiction or InHOUSE System Administrator.
Maintaining InHOUSE Security:

5.2 Downloading of Data from InHOUSE System:

Policy:

InHOUSE aggregate data for an agency or system-wide must not contain any PPI and therefore does not require the highest levels of protection reserved for PPI. However, this aggregate data should be limited to authorized use and disclosure.

Data containing PPI (non-aggregated data) must always be stored in binary, not text, format. Agency/Jurisdiction may download data. However, to comply with the binary format, if an agency/jurisdiction chooses to download its data, it must download to common database applications that use a binary format which include Microsoft Access, Microsoft SQL Server, Oracle, or other appropriate databases. No data containing PPI may be downloaded to any unauthorized remote access site at any time for any reason.

Agency/Jurisdiction must never download data for clients not in its programs.

Downloaded data that includes PPI may not be stored on any network drive accessible to anyone not trained through the InHOUSE Privacy and Security Training. If the data is stored on a portable medium (e.g. disks, CDs, tape), that medium must be securely stored when not in use and never left unattended in a public area. Such storage mediums may not be taken off site at any time for any reason.

Access to the downloaded data is restricted to persons successfully completing Privacy and Security Certification Training to maintain security standards.

Failure to follow this policy will be considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual. Agency/Jurisdiction is responsible for ensuring its data users’ compliance with this policy.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy, and train and monitor all users.
5.3 Deleting of Data Downloaded from InHOUSE System:

Policy:

In order to delete downloaded HMIS data containing PPI from a data storage medium, the agency/jurisdiction must reformat the storage medium a minimum of two (2) times before reusing or disposing of the medium. This is true for hard drives, floppy disks, zip drives/disks, tape backups, etc. To dispose of data stored on CDs, the CD must be physically destroyed.

If an agency/jurisdiction is not prepared to reformat a hard drive as specified to delete downloaded HMIS data containing PPI, the data should not be downloaded to that medium.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy, and train and monitor all agency/jurisdiction users.

5.4 Printing of Hard Copy Data:

Policy:

Hard copy data containing PPI may only be printed from the InHOUSE system at the physical agency/jurisdiction location(s) and only on printers secured from public access.
Maintaining InHOUSE Security:

5.5 Disposing of Hard Copy Data:

Policy:

An agency/jurisdiction is responsible for disposing of documents that contain PPI by shredding paper records.

Procedure:
A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy.
B. CoC staff and/or CoC/InHOUSE consultants will periodically review agency/jurisdiction compliance with this policy in the course of monitoring agency/jurisdiction compliance with privacy and security standards.

5.6 Reported Data:

Policy:

Only aggregated data not containing any PPI will be released or reported outside of the agency/jurisdiction that collected or has access to such information.

Procedure:
A. A participating agency/jurisdiction shall only release or report de-identified aggregate data that does not contain PPI.
B. Failure to comply with this policy will result in the downgrading or suspension of license access to the InHOUSE system.

5.7 Reporting Security Violations:

Policy:

If a security violation should occur, the agency/jurisdiction must notify the InHOUSE System Administrator and CoC staff of the violation within 24 hours by email and phone.

Procedure:
A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy.
B. Failure to comply with this policy will result in the downgrading or suspension of license access to the InHOUSE system.
5.8 Virus Protection on User Systems:

Policy:

Each agency/jurisdiction will take all necessary precautions to prevent any destructive or malicious program (virus) from being introduced into their system that is used to access the InHOUSE system. If a virus is introduced into the agency/jurisdiction system, the agency/jurisdiction must act rapidly to resolve the issue, including completing agency-/jurisdiction-wide security checks as appropriate.

Procedure:

A. A participating agency/jurisdiction shall adopt, if it has not previously, the following standards:
   1) Industry-recognized Anti-Virus software will be installed and maintained in all user workstations.
   2) No un-scanned media will be introduced to the system.
   3) No downloading of internet programs/files will be permitted, except for necessary software or operating system updates issues by the manufacturer.
   4) Individual workstation virus definitions will be updated weekly or more often when required.
   5) Virus protection on all servers will be updated regularly.
   6) System server(s) will be scanned daily.
   7) Spyware that is included with Anti-Virus or firewall software should be loaded for added protection.

B. If infection does occur, NO ACCESS TO THE InHOUSE SYSTEM WILL BE ALLOWED BY ANY USER UNTIL THE ENTIRE SYSTEM IS CLEANED AND DECLARED SECURE BY THE SYSTEM ADMINISTRATOR.
Maintaining Data Integrity:

6.0 Weekly Data Entry:

Policy:

Data entry by an agency/jurisdiction must take place, at minimum, on a weekly basis. Participating agencies/jurisdictions are responsible for assuring that the reportable HUD data is as complete and accurate as possible.

Procedure:

A. The Technical Administrator will run weekly custom reports to identify missing data elements required for HUD reporting.
B. The agency/jurisdiction will have established a procedure to address report results and enter missing data.

6.1 Monthly ROI Monitoring:

Policy:

A participating agency/jurisdiction will run a monthly report to identify upcoming ROI expiration dates for active client records in the InHOUSE system. Staff will make all reasonable efforts to obtain a new ROI and enter in the InHOUSE system prior to the expiration of the existing ROI.

Procedure:

A. The Technical Administrator will run a monthly report to identify active clients with an ROI expiring in the next month for all programs that operate at least three times per week except Shelter Plus Care.
B. The Technical Administrator for Shelter Plus Care and all programs operating less frequently than three times per week will run a monthly report to identify active clients with an ROI expiring in the next two months to allow ample time to secure renewal of ROI.
C. The agency/jurisdiction will have established a procedure to obtain new ROIs from these active clients and enter the new ROI information into the InHOUSE system prior to the expiration of the existing ROI.
6.2 Previously Obtained Data without an ROI:

Policy:

If an agency/jurisdiction possesses a current ROI on an active client, historical data may be entered for the program year.

If no current ROI is possessed, agency/jurisdiction may enter client data and close it to others in limited circumstances with the set-up and permission from the System Administrator. Entry of such data needs to be completed correctly to minimize risk to the InHOUSE and secure other system data for HUD-mandated homeless counts.

Agency/jurisdiction is responsible for the costs of manual or electronic entry of historical data.

Procedure:

A. The System Administrator must approve all agency/jurisdictions seeking to enter historical data.

B. All staff designated to manually input or oversee input of historical data must successfully complete Additional User Training to learn proper techniques to accurately enter such data. Availability of the Additional User Training is subject to the System Administrator’s availability.

C. All agency/jurisdictions seeking to electronically transfer and upload historical data must partner with the System Administrator for guidance in mapping all data fields and other tasks required by the System Administrator to ensure an efficacious upload of data.
Training:

7.0 Privacy and Security Certification Training:

Policy:

Any agency/jurisdiction staff or designees conducting any intake, data entry, or other data processing functions must complete Privacy and Security Certification Training and become certified. Upon initial implementation of an agency/jurisdiction, Privacy and Security Certification Training will be provided by CoC staff. All subsequent Privacy and Security Certification Training of new agency/jurisdiction staff for the InHOUSE system will be completed by either attending a Council-sponsored Certification Training or by one-on-one training sessions conducted by the agency/jurisdiction's InHOUSE manager or Policy and Procedure Administrator using Alameda Countywide Homeless Continuum of Care Council-provided Training and Certification materials. The Council-sponsored Privacy and Security Certification Trainings, conducted by CoC staff, will occur regularly, and will be open to all new agency/jurisdiction staff.

Procedure:

A. Upon initial implementation, agency/jurisdiction will identify all relevant staff, volunteers, interns, and contractors who must complete Privacy and Security Certification training and submit the list of names to the System Administrator upon request.

B. CoC staff will schedule and provide Privacy and Security Certification training to all initial InHOUSE users and intake staff.

C. Upon completion of the Privacy and Security Certification Training, the Council will notify the Implementation Team Lead and agency executive director/jurisdictional lead staff of the certification status of its staff. Certification will be mailed for staff successfully completing the Privacy and Security Certification.

D. Staff who do not successfully complete the Certification (by failing to pass the Certification test) will be rescheduled into a future Privacy and Security Certification Training.

E. Upon completion of initial implementation, CoC staff will provide the agency/jurisdiction Policies and Procedures Administrator with a master set of training materials to be used (copied) for subsequent Privacy and Security Certification Training of new agency/jurisdiction staff.

D. CoC updates made to Privacy and Security Certification Training materials will be sent to the agency/jurisdiction Policies and Procedures Administrator.
E. The agency/jurisdiction Policies and Procedures Administrator must sign-off on the successful completion of Privacy and Security Certification Training for each new user trained by the agency/jurisdiction. The Policies and Procedures Administrator will provide verification to the InHOUSE System Administrator, including the names and contact information of all individuals who completed the Privacy and Security Certification Training, a completed Certification test, and a signed Privacy Agreement. Council staff will correct the test and complete the Certification before a user access license to the InHOUSE system will be issued.

F. The agency/jurisdiction Policies and Procedures Administrator must sign-off on the successful completion of any supplemental Privacy and Security Training conducted by the agency/jurisdiction for users and provide such verification to the InHOUSE System Administrator, including the names and contact information of all individuals who completed supplemental Privacy and Security Training.
7.1 ServicePoint User Training:

Policy:

Upon initial implementation of an agency/jurisdiction, CoC staff will provide ServicePoint User Training. All subsequent ServicePoint User Training of new agency/jurisdiction staff for the InHOUSE system will be completed by either attending a Council-sponsored ServicePoint User Training or by one-on-one training sessions conducted by the agency/jurisdiction's InHOUSE manager or Technical Administrator using Alameda Countywide Homeless Continuum of Care Council-provided User Training materials. The Council-sponsored ServicePoint User Trainings, conducted by CoC staff, will occur regularly, and will be open to all new agency/jurisdiction staff. In addition, the Council will convene future user trainings to address large system-wide topics, such as new ServicePoint modules or major software upgrades.

Procedure:

A. Upon initial implementation, agency/jurisdiction will identify relevant staff, volunteers, interns, and contractors who must complete ServicePoint User Training and submit the list of names to the System Administrator upon request.

B. CoC staff will schedule and provide ServicePoint User Training to all initial InHOUSE users.

C. Upon completion of initial implementation, CoC staff will provide the agency/jurisdiction Technical Administrator with a master set of training materials to be used (copied) for subsequent ServicePoint User Training of new agency/jurisdiction staff.

D. CoC updates made to ServicePoint User Training materials will be sent to the agency/jurisdiction Technical Administrator.

E. The agency/jurisdiction Technical Administrator must sign-off on the successful completion of ServicePoint User Training for each new user and provide such verification to the InHOUSE System Administrator before a user access license to the “live” InHOUSE system will be issued.
Training:

7.2 ServicePoint Technical Administrator Training:

Policy:

Upon initial implementation of an agency/jurisdiction, ServicePoint Technical Administrator training will be provided by CoC staff.

Should a change occur in the staffing of the Technical Administrator role at an agency/jurisdiction, the agency/jurisdiction InHOUSE Manager will confer with the InHOUSE System Administrator as to the plan for training the new Technical Administrator.

Procedure:

A. Upon determination of a change of Technical Administrator at an agency/jurisdiction, the agency/jurisdiction InHOUSE Manager will notify the InHOUSE System Administrator of the upcoming change. Together, they will determine the plan for training the new Technical Administrator.
8.0 Agency/Jurisdiction Reporting Technology Solutions:

Policy:

CoC staff and consultants will continue to secure appropriate reporting technology, software and training for InHOUSE partner agencies such that agency/jurisdiction can internally generate agency-specific and some system-wide reports.

8.1 Agency/Jurisdiction APR Reporting:

Policy:

An agency/jurisdiction can generate its own program’s APR reporting using the InHOUSE ServicePoint software.

8.2 Agency/Jurisdiction Custom Reporting:

Policy:

Agencies/jurisdictions are responsible for their own custom reporting of agency/program data. It is the goal of the CoC to provide additional custom reporting options to agencies and jurisdictions. CoC is currently awaiting the release of a new reporting solution by Bowman Internet System targeted for January 2005. Following the release of that product, CoC will evaluate its utility to agency/jurisdiction’s needs and either purchase that product or secure other software as a reporting solution. When the final reporting solution is identified, the InHOUSE System Administrator will provide the relevant information and training.
Reporting:

8.3 Reports for Collaboratives:

Policy:

A reporting solution for collaborative grants currently resides with the InHOUSE System Administrator who can prepare collaborative reports at the agency/jurisdiction’s request. Specific software solutions that will allow collaborative partners to generate reports themselves are in process, but are not available at this time.

8.4 System-wide Reporting:

Policy:

Until specific software solutions are available to enable participating agency/jurisdictions to generate aggregate system-wide reports, the Council will generate annual and periodic data for public use.
InHOUSE System Maintenance/Upgrades:

9.0 Upgrading ServicePoint Software:

Policy:

Periodically it will be necessary to upgrade ServicePoint software. This upgrade will be done by Bowman Internet Systems, the software vendor. The InHOUSE System Administrator will coordinate system upgrades with Bowman Systems and make the necessary notifications to all participating users.

Procedure:

A. System software upgrades will be scheduled in advance and notification will be made to all participating users via the ServicePoint System News and notification to agency/jurisdiction Technical Administrators. Every effort will be made to minimize system downtime.
InHOUSE System Governance and CoC Roles and Responsibilities:

10.0 System Governance and Oversight:

Policy:

The Executive Committee of the Alameda Countywide Homeless Continuum of Care Council will provide system governance and oversight of policies, procedures, and significant concerns about the InHOUSE system. Issues affecting the entire user system or large population segments will be vetted in appropriate community-wide forums which may include Council meetings, focus groups, or public comments periods.

Procedure:

A. CoC Council staff and consultants will identify the most appropriate forum from which to solicit comment and input about policy decisions and implementation documents.

B. Staff will publicize and invite relevant parties and specify the scope of conversation/comments and the length of the comment period.

C. Revisions of this Policy and Procedures document may be necessary from time to time. Supplemental and/or replacement pages may be distributed. A full community-wide review and revision will occur in July 2006 and periodically thereafter.

D. The Executive Committee of the Council will approve revisions to the Policies and Procedures contained in this document, this document as amended, and any other documents that establish policy.

E. Appeals to published policies and procedures after the comment period may be made by any party to the Executive Committee of the Council. Appeals must be in writing and will then be scheduled for review by the Executive Committee or a special committee of the Executive Committee.
10.1 InHOUSE System Grievance and Security Committee:

Policy:

An InHOUSE System Grievance and Security Committee will be created and meet as needed to address reported agency/jurisdiction client grievances and reported/suspected system security violations. Client grievances that will be considered by this committee are limited to denial of access to or correction of data in the InHOUSE system, or violations of their specific written release of information consent for the InHOUSE system. The committee will consist of CoC Staff, and uninvolved non-conflicted Jurisdiction Staff, and uninvolved non-conflicted Agency staff that are members of or appointed to the CoC Executive Committee. A Consumer will also participate when available.

Procedure:

A. In the case of reported/suspected security violations, a formal letter will be sent to the license holder (with copies to the agency/jurisdiction InHOUSE Manager, Policies and Procedures Administrator and Technical Administrator) detailing the reported violation and requesting corrective action.

B. Written notification of corrective action, detailing the plan for rectifying the security violation, must be sent from the agency/jurisdiction InHOUSE Manager or Policies and Procedures Administrator to designated CoC Staff or InHOUSE System Administrator.

C. The plan must include monitoring as part of the corrective action.

D. Failure to comply with the plan will result in downgrading of license access, and possible suspension or revocation of licenses.

E. Failure to respond to a notification by the InHOUSE System Grievance and Security Committee within 10 working days will result in downgrading of license access, suspension or revocation of licenses.

F. Eligible client grievances will only be considered following completion of the entire agency/jurisdiction grievance process.
InHOUSE System Governance and CoC Roles and Responsibilities:

10.2 Right to Deny Access:

Policy:

The access of a participating agency/jurisdiction and/or user(s) may be suspended for suspected violation of security protocols. The access of a participating agency/jurisdiction and/or user(s) may be suspended or revoked for actual violation of security protocols.

10.3 CoC Roles and Responsibilities:

**Executive Committee**

The Executive Committee will provide oversight and governance, including financial oversight, and ensure that InHOUSE (including Phase 1 and Phase 2) is implemented in a manner consistent with the vision established in the HMIS Planning Committee.

1. Approve annual budget for InHOUSE, including staffing.
2. Approve the annual InHOUSE workplan, including scheduling for implementation.
3. Approve contracts and principal documents.
4. Receive and review monthly written financial reports.
5. Receive and review monthly written reports on progress and issues.

**Stakeholder Community**

The Stakeholder Community will provide input to community-wide or population-specific policy level decisions affecting the full implementation.

1. Receive regular e-mail updates on InHOUSE developments, major issues, implementation schedule and progress.
2. Provide input through email/mail reviews of InHOUSE documents and implementation process.
3. Participate in forums as requested.
CoC Staff

The CoC staff and/or project-based consultants will manage and oversee the entire InHOUSE implementation and on-going operations.

1. Prepare annual InHOUSE budget for Executive Committee approval.
2. Prepare the annual InHOUSE work plan.
3. Prepare contracts and documents.
4. Prepare monthly written financial reports.
5. Prepare monthly written reports on progress and issues and annual reports including budget, project status, and work plan.
6. Distribute InHOUSE documents and implementation processes for review.
7. Arrange and staff regular HMIS forums.
8. Develop InHOUSE configuration, implement and operate the InHOUSE system on a day-to-day basis, including providing training and technical assistance.
9. Maintain relationship with the software vendor, negotiate any contractual changes and provide significant input on proposed software solutions.
10. Work with participating agencies.
11. Work with the federal Department of Housing and Urban Development (HUD) to ensure InHOUSE meets all relevant federal mandates and is in accordance with HUD HMIS priorities.
12. Work with and coordinate with Bay Area Counties and other HMIS interested groups.
InHOUSE System Governance and CoC Roles and Responsibilities:

10.3 CoC Roles and Responsibilities: *(continued)*

**InHOUSE System Administrator**

The InHOUSE System Administrator will manage the day-to-day software application, oversee the agency-specific implementation and compliance, and liaison between the agency/jurisdiction and the software vendor.

1. Perform initial agency setup and configuration within the system.
2. Administer and manage user accounts, logins and passwords for local agency administrators.
3. Update training modules (including training materials) for agency administrators.
4. Provide technical assistance within the continuum and facilitate trouble-shooting and problem resolution.
5. Perform data quality review on an ongoing basis.
6. Review and monitor across user agencies to ensure security, confidentiality and quality of the information within the system and adherence to standard policy and procedures.
7. Coordinate and manage all system upgrades with the software vendor and users.
8. Create and run all required custom and collaborative reports.
9. Liaison with system software vendor to resolve technical issues.
Work Flow Procedures:

11.0 Data Element Definitions:

A few key data elements are defined because no definition exists from HUD and the element is critical within the system of care locally.

Definitions:

A. The following is the proposed definition for “earned Income” within the InHOUSE HMIS system. When more rigid standards apply for a specific funding stream, particularly for employment programs, the more rigid standard shall supercede this definition and apply for that program or programs.

**Earned Income**

Earned income is verifiable financial compensation that is received in exchange for someone’s time and labor, regardless of duration, permanency, or subsidized or transitional nature of the relationship. This includes:

- Full Time Employment – A job in which an employee works thirty-five (35) or more (usually 40) hours during a typical workweek.
- Part Time Employment – A job in which an employee works between 1 to 34 hours during a typical workweek.
- Temporary Employment – A job that lasts for a limited time whereby an employee generally works less than a year on one assignment, regardless of the number of hours worked per week.
- Day Labor – A job in which an employee is hired and paid one day at a time, with no promise that more work will be available in the future.

Verifiable: Able to be confidently validated through means such as copy of a check stub, a payment voucher, letter of hire, or conversation with an employer. While not all programs require the verification of earned income, in order to be counted as earned income, the source must be able to be verified.

Financial: cash or other legal tender such as checks. This does NOT include barter-like arrangements where cash or other legal tender is not exchanged. For example, an arrangement where a client works in exchange for room, utilities, and/or meals can not be counted as a financial compensation since no cash exchange is made between the two parties.

Regardless of duration, permanency, or subsidized or transitional nature: Determining earned income is not dependant on whether the individual has worked a specified number of days; whether the employment is seasonal, temporary, or permanent; or whether the job is a supported employment opportunity or subsidized in any way. This is the biggest variant from other “employment” or “earned income” definitions in other programs.
B. **Other Income**

Other income not meeting the above definition can be reported as income in the “other” category with the specific source and amount identified on the Intake and in InHOUSE. This may include panhandling, recycling, live-in barter or “work for rent” arrangements, and other informal activities.

**11.1 Client Search Prior to Intake:**

**Policy:**

Prior to conducting an Intake for a new program entry, staff of each participating agency/jurisdiction will obtain and print the most current Basic Intake or Basic Eligibility information (if available) for each client. Agency/jurisdiction staff will verify the information and then conduct the remaining Intake questions with the client.

**Procedure:**

A. Staff of each participating agency/jurisdiction will, prior to conducting an intake, log into InHOUSE and search for the client.

B. Upon locating the specific client, the agency/jurisdiction will print the Basic Intake or Basic Eligibility for the client.

C. The agency/jurisdiction staff will then review the printed details with the client to insure accuracy and complete any unanswered questions.

D. The agency/jurisdiction staff will then complete the remaining Intake sections or forms for each new Intake.

E. Should the client not be found to exist within InHOUSE, the agency/jurisdiction staff would conduct a complete Intake set.

**11.2 Entry Procedures:**

**Policy:**

Every household member receiving any type of service (e.g., a meal, a bed, any type of counseling, medical services, housing, or any other service) must have a completed intake and be entered into the InHOUSE system.

**Procedure:**

First ask the question as printed on the Intake form. If the client is unsure of what is being asked, restate the question, as needed, to insure understanding.
11.3 Update Procedures:

Housing Assessment Policy:

Every housing change for a household must be recorded and entered into InHOUSE.

Procedure:

A. A Housing Assessment form will be completed by agency/jurisdictions staff each time a household moves in or out of permanent housing.
B. Data from the form will be entered into InHOUSE.
C. Data entry will follow the InHOUSE Policy and Procedure expectation of once per week.

Annual Update Policy:

Every client that is in a program one year or longer must have his/her record annually updated with information prescribed by HUD and this community, which minimally includes income, non-cash benefits, and disabilities. A Housing Assessment update will also be completed on the Head of Household’s record (if applicable).

Procedure:

A. Each agency/jurisdiction will run the Annual Update Report (ART) to generate a list of clients in need of an Annual Update. Clients will appear on the ART report if they have not had a new program entry or update (by any other agency) within the last twelve months.
B. Each agency/jurisdiction will complete a new Release of Information (v. 5.1) and Annual Update for each client who appears on the Annual Update Report. The Annual Update will be completed annually for each client.
D. The agency/jurisdiction will enter an Annual Update service, in InHOUSE, on the Head of Household’s record. When entering the service, also select any other family members that received the service at the same time as the Head of Household.
E. The Annual Update service will be entered for the program that performed the Annual Update and/or collected the data.

Approved: Performance Management Committee, March 2012
11.4 Exit Procedures:

Policy:

Persons will be exited from Outreach and Drop In Center programs when:

- the person moves to any location where the program will not continue working with the individual, such as a residential treatment program, jail, permanent housing, or some shelter situations where the program does not continue working with the individual, OR
- the person has had no contact within the prior six months.

Approved: Performance Management Committee, Oct. 2010

Procedure:

A. Identify the last date of contact with a client. Reports in InHOUSE HMIS can help identify the date of last contact if services are being entered.

B. Administratively complete the exit form utilizing the most recent data in the case file, client records, or from client interview.

C. Date the exit back to the date of last contact and complete the correct data entry procedures for exiting a client from a program.

D. For the best data quality, at every contact, attempt to update someone’s housing situation and income in the case notes so that at exit to the last date of contact, the case notes will reflect the person’s housing and income situations at the time. This will most accurately reflect the person’s situation and will also mitigate numerous “unknown” and “refused” responses at exit.

11.5 Exit Dates:

Policy:

The exit must be dated back to the date of last contact for every client exit.
Appendices:

Appendix A - Agency/Jurisdiction Participant Agreement (MOU)

Appendix B - Privacy Agreement

Appendix C - User Agreement

Appendix D - HUD Final Data Standards

Appendix E - HUD HMIS Privacy and Security Standards - Summary

Appendix F - Sample Privacy Notice

Appendix G - Client Release of Information Authorization

Appendix H - HUD HMIS Required Data Elements List

Appendix I - Glossary
Appendices:

Appendix A – InHOUSE Partner MOU
Appendix B – Privacy Agreement
Appendix C – User Agreement
Appendix D – HUD Final Data Standards
Appendix E – HUD HMIS Privacy and Security Standards – Summary
Appendix F – Sample Privacy Notice
Appendix G – Client Release of Information Authorization
Appendix H – HUD HMIS Required Data Elements List
Appendix I – Glossary
Appendix A

InHOUSE Partner MOU
Alameda Countywide HMIS

InHOUSE: Information about Homelessness, OUtcomes, and Service Engagement

InHOUSE Partner MOU

The Alameda Countywide Homeless Management Information System (HMIS) known as InHOUSE is an information system that maintains information regarding the characteristics and service needs of Clients. InHOUSE will facilitate more effective and streamlined services to Clients and create information that communities can use to determine the use and effectiveness of services.

The InHOUSE system is designed to benefit multiple stakeholders, including persons using homeless-targeted services, provider agencies, jurisdictions, other systems of care, funders and the community. Improved knowledge gained from InHOUSE about various communities with special needs and their service usage will lead to a more effective and efficient service delivery system.

The Alameda Countywide Homeless Continuum of Care Council (Council) has been designated through a broad community planning process to oversee the planning, funding, implementation and on-going operation of the InHOUSE system.

__________________________ ("Agency" or “Jurisdiction”) has elected to participate in the InHOUSE system.

Agency/Jurisdiction and Alameda Countywide Homeless Continuum of Care Council agree as follows:

1. General Understandings:

   a. In this Agreement, the following terms will have the following meanings:

      (i) "Client" refers to a consumer of services.

      (ii) "Agency" or “Agency/Jurisdiction” refers generally to any Agency or Jurisdiction participating in the InHOUSE system in accordance with a current InHOUSE Partner Memorandum Of Understanding.

      (iii) “Agency staff” refers to paid employees, volunteers, affiliates, contractors, and associates of Agencies and Jurisdictions using InHOUSE.

      (iv) “Council staff” refers to the Council Coordinator, other Council employees, volunteers, affiliates, contractors, and associates performing tasks pertaining to InHOUSE on behalf of the Council.

      (v) “InHOUSE” refers to Information about Homelessness, OUtcomes and Service Engagement, the Alameda Countywide HMIS system.

      (vi) “Enter(ing)” or “entry” refers to the input of any Client information into InHOUSE.

      (vii) “Share(ing)” or “Information Share(ing)” refers to the sharing of basic Intake information which has been entered in InHOUSE with another Partner Agency/Jurisdiction.

      (viii) “Executive Committee” refers to the Alameda Countywide Homeless Continuum of Care Council’s governing body responsible for advising about and overseeing the implementation and operation of the InHOUSE HMIS. The Executive Committee is composed of representatives from Alameda Countywide Homeless Continuum of Care Council, other stakeholders, and subject-specific members. A list of the current members of the Executive Committee is available from the Council Coordinator.
(ix) "Identified or Confidential Data" refers to Client data containing Protected Personal Identifiers that can be used to identify a specific Client.

(x) "Deidentified Data" refers to data that has Client-specific information removed, allowing use of the data without identifying a specific Client. Also referred to as "non-identifying" or "aggregate" information.

b. Agency/Jurisdiction understands that when it enters information into InHOUSE, such information will be available to the Council staff or contractors who may review the data to administer InHOUSE; to conduct analysis; and to prepare reports which may be submitted to others in de-identified aggregate form without individual identifying Client information.

c. Agency/Jurisdiction understands that Client will have the ability to indicate whether basic Intake information Agency/Jurisdiction entered into InHOUSE may be shared with and accessible to Partner Agencies/Jurisdictions in the InHOUSE system. Agency/Jurisdiction is responsible for designating within InHOUSE, according to Client's desire, whether Intake information may or may not be shared.

d. Correspondence with other communities about the InHOUSE system or the Countywide HMIS will be directed to and originate from the Continuum of Care Coordinator.

2. Supplemental Documents:

Three additional documents further lay out expectations and agreements among the parties using the InHOUSE system. These include the InHOUSE Policies and Procedures Manual, the InHOUSE User Agreement, and the Privacy Agreement. These documents are distinct yet supplemental to this agreement to allow updating of said documents from time to time according to the system governance guidelines in the Policies and Procedure Manual.

a. InHOUSE Policies and Procedures Manual details the policy and implementation steps for roles and responsibilities, privacy requirements, notification of privacy protections, access privileges, breach of confidentiality and/or security, client rights, maintenance of system security and data integrity, training requirements, reporting of data, and system governance.

b. InHOUSE User Agreement specifically details the obligations and responsibilities of each User of the InHOUSE system. Each InHOUSE User must agree to abide by and sign the User Agreement.

c. Privacy Agreement details the obligations and responsibilities of each person who collects data for and/or utilizes sensitive data generated from InHOUSE. Anyone who collects data for or works with data generated by the InHOUSE system that contains Protected Personal Identifiers must agree to abide by and sign the Privacy Agreement.

Agency/Jurisdiction and Council staff will abide by the InHOUSE Policies and Procedure Manual, the InHOUSE User Agreement, and the Privacy Agreement at all times. Agency/Jurisdiction will monitor its staff in such a way as to reasonably assure compliance with the Policies and Procedure Manual, the User Agreement, and the Privacy Agreement by its entire staff.
4. **Additional Confidentiality Protections:**
   a. The Agency/Jurisdiction will uphold applicable federal and state confidentiality regulations and laws that protect Client records.
   
b. The Agency/Jurisdiction shall only release client records with signed consent by the client or in accordance with applicable law.
   
c. Parties to this Agreement will not share medical, HIV/AIDS, mental health, substance use, details about a disability, or any violence-related information without a separate written consent by the client for the release of such information.
   
d. The Agency/Jurisdiction shall verbally explain to a Client about the InHOUSE database and the terms of consent and shall arrange for a qualified interpreter or translator in the event that Client is not literate in English or has difficulty understanding the consent form.

5. **Storage of Data:**
The Agency/Jurisdiction understands the file server, which will contain all Client information, including encrypted identifying Client information, will be located at Bowman Internet System, Inc. offices at 400 Travis Street, Suite 1900, Shreveport, LA 71101.

6. **Readiness for Implementation and Use of InHOUSE:**
Agency/Jurisdiction must complete specific tasks listed below for implementation of InHOUSE. The primary readiness tasks are noted below. Council staff must verify completion of all Readiness tasks. Failure to complete all readiness tasks at Agency/Jurisdiction may result in delay of the implementation.

   a. **Technological Readiness Assessment:** Agency/jurisdiction will correct all mandatory findings identified in their Technological Readiness Assessment.
   
   b. **Privacy Notice:** Agency/Jurisdiction must create or adapt an existing privacy notice detailing the Use and Disclosure of Client data within InHOUSE.
   
   c. **Workflow Document:** Agency/Jurisdiction must produce a Workflow Document as detailed by Council Staff.
   
   d. **Privacy and Security Certification Training:** All Agency/Jurisdiction staff that conduct Intake functions or handle data containing Protected Personal Identifiers must successfully complete the InHOUSE Privacy and Security Certification Training before conducting Intakes (including paper-based forms) for InHOUSE or handling such data.
   
   e. **ServicePoint User Training:** All users of the InHOUSE system must complete an InHOUSE ServicePoint User Training (after completing the Privacy and Security Certification Training) before being given access to a User license.
   
   f. **Agency/Jurisdiction-specific Set-up Information:** Agency/Jurisdiction will complete all programmatic diagramming, selection of picklists, identification of custom data fields, and other items as requested by the System Administrator in order to be set up in the software.
7. **No Conditioning of Services:**
Agency/Jurisdiction will not make sharing of Client Intake information in InHOUSE a condition for receiving any services.

8. **Restrictions on Release of Information from InHOUSE:**
Agency/Jurisdiction agrees not to release any Client identifying information received from InHOUSE to any other person or organization without written informed Client consent, or as required by law.

9. **Availability and Assistance:**
   a. All requests for troubleshooting or other assistance regarding the software or system utilization shall be directed to the Council’s InHOUSE System Administrator.

   b. InHOUSE staff will be reasonably available during the Council’s weekday business hours for technical assistance (i.e. troubleshooting and report generation).

   c. Requests for assistance will be addressed within two working days from receipt of the request. Concerns, complaints, or other communication about the competency and/or responsiveness of InHOUSE staff shall be directed to the Council Coordinator.

   d. Partner Agency/Jurisdiction shall not direct any inquiries directly to the software vendor.

10. **Records:**
Agency/Jurisdiction and the Council will maintain records of any disclosures of Client identifying information for a period of three years after such disclosure. Upon written request of a Client, Agency/Jurisdiction and Council staff will provide an accounting of all such disclosures within the prior three-year period. The Council will have access to an audit trail from InHOUSE to produce an accounting of disclosures made from one Agency/Jurisdiction to another.

11. **Use of InHOUSE:**
   a. Agency/Jurisdiction and Council Staff will use InHOUSE for its legitimate business purposes only.

   b. The Agency/Jurisdiction shall use Client information in the InHOUSE system, as provided to the Agency/Jurisdiction, to assist the Agency/Jurisdiction in providing adequate and appropriate services to the Client.

   c. Agency/Jurisdiction and its staff will not access identifying information for any individual for whom services are neither sought nor provided by the Agency/Jurisdiction. Agency/Jurisdiction may access identifying information for its Clients and may request access to statistical, non-identifying information on both its Clients and Clients served by other InHOUSE participating agencies.

   d. The transmission of material in violation of any federal or state regulations is prohibited. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
a. Agency/Jurisdiction will not use InHOUSE with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

12. Fee:
   a. The Alameda Countywide Homeless Continuum of Care Council will cover the majority of Agency/Jurisdiction-specific costs (e.g. licenses) and system administration costs (e.g. InHOUSE staff) beginning July 1, 2005.
   
   b. Agency/Jurisdiction is responsible for costs associated with connectivity to the internet, hardware that is compliant with software, privacy and security requirements, staff time for InHOUSE training activities, and staff data entry time.
   
   c. While the Council has every intention of maintaining this funding arrangement, the Council reserves the right to charge the Agency/Jurisdiction fees to cover funding shortfalls and/or agency/jurisdiction-specific costs in excess of planned allocations.
   
   d. Any fees not specific to an Agency/Jurisdiction requiring support in excess of planned allocations will be proposed by the Executive Committee of the Council, presented to the InHOUSE partners for comments, and adopted by the Executive Committee following review of partner feedback and InHOUSE financials. Agency/Jurisdiction will have sufficient time to identify appropriate resources.

13. Damage to InHOUSE:
Agency/Jurisdiction shall take due diligence not to cause in any manner, or way, corruption of InHOUSE, and Agency/Jurisdiction agrees to be responsible for any damage it may cause.

14. Community Stakeholders:
Council Staff will consult with the Council, Partner Agencies/Jurisdictions, and other stakeholders from time to time regarding community-wide issues such as revision to policy, procedures, and forms.

15. Grievance:
Written Agency/Jurisdiction complaints that are not resolved within the Agency/Jurisdiction may be forwarded to the InHOUSE Grievance and Security Committee of the Executive Committee, which will try to reach a voluntary resolution of the complaint.

16. Limitation of Liability and Indemnification:
   a. No party to this Agreement shall assume any additional liability of any kind due to its execution of this Agreement. The parties intend that each party shall remain liable, to the extent provided by law, regarding its own acts and omissions, but that no party shall assume additional liability on its own behalf or liability for the acts of any other person or entity except for the acts and omissions of their own employees, volunteers, agents or contractors through participation in InHOUSE. The parties specifically agree that this agreement is for the benefit of the parties only and this agreement creates no rights in any third party.
   
   b. To the fullest extent permitted by law, Agency/Jurisdiction agrees to indemnify, defend, and hold Alameda Countywide Homeless Continuum of Care Council, its agents, officials, and staff harmless from and against any and all claims, losses, damages, liabilities, and expenses, including legal fees and disbursements paid or incurred, arising from any breach of this Agreement or any of Agency/Jurisdiction's obligations under this Agreement.
To the fullest extent permitted by law, Alameda Countywide Homeless Continuum of Care Council agrees to indemnify, defend, and hold Agency/Jurisdiction, its agents, officials, and staff harmless from and against any and all claims, losses, damages, liabilities, and expenses, including legal fees and disbursements paid or incurred, arising form any breach of this Agreement or any of Agency/Jurisdiction’s obligations under this Agreement.

The Alameda Countywide Homeless Continuum of Care Council shall not be held liable to any member Agency/Jurisdiction for any cessation, delay or interruption of hosting or software services, nor for any malfunction of hardware, software or equipment. Liability and complaints regarding the Council’s responsiveness to technical assistance requests shall be directed to the Executive Committee.

### 17. Additional Terms and Conditions:

a. Agency/Jurisdiction will abide by such rules and regulations promulgated by HUD and/or the Council and/or the Executive Committee regarding administration of InHOUSE.

b. Agency/Jurisdiction and Council intend to abide by applicable law. Should any term of this Agreement be inconsistent with applicable law, or should additional terms be required by applicable law, Agency/Jurisdiction and Council agree to modify the terms of this agreement so as to comply with applicable law. No such change to particular sections will impact the validity or standing of other parts of the Agreement.

c. Neither Council nor Agency/Jurisdiction will transfer or assign any rights or obligations regarding Alameda Countywide HMIS without the written consent of either party.

### 18. Termination:

This Agreement will be in force until terminated by either party. Either party may terminate this agreement at will with 60 day written notice. Either party may terminate this agreement immediately upon a material breach of this Agreement by the other party, including but not limited to the breach of InHOUSE security or confidentiality by Agency/Jurisdiction. Exercising termination rights may affect Agency/jurisdiction’s eligibility for federal funding including those that are locally administered (e.g. SHP, ESG, CDBG, CSBG, and HOPWA).

d. If this Agreement is terminated, Agency/Jurisdiction will no longer have access to InHOUSE. Council and the remaining Partner Agencies/Jurisdictions will maintain their right to use all of the Client information previously entered by Agency/Jurisdiction except to the extent a restriction is imposed by Client or law.

e. Upon termination, Council will notify representatives of the jurisdiction(s) in which the Agency/Jurisdiction provides services.

f. If this Agreement is terminated, the Council and remaining Partner Agencies/Jurisdictions shall maintain their right to use all Client data previously entered by the terminating Partner Agency/Jurisdiction; this use is subject to any restrictions requested by the Client and by the Policies and Procedures Manual.

g. Upon termination, copies of Agency/Jurisdiction data will be provided to the Agency/Jurisdiction. Data will be provided on CDs or other mutually agreed-upon media.
h. Unless otherwise specified in writing, copies of data will be delivered to Agency/Jurisdiction within twenty-one (21) calendar days of receipt of written requests for data copies.

i. If termination is being pursued by the Council due to breach of contract, Agency/Jurisdiction will receive notice of breach and have the right to address and correct said breach. Only in the absence of appropriate and reasonable intervention and resolution by Agency/Jurisdiction will termination of Agency/Jurisdiction participation be completed by Council.

Signed,

_________________________________________  
Signature of Executive Director/Manager  

_________________________________________  
Date

_________________________________________  
Print Executive Director/Manager Name

_________________________________________  
Agency/Jurisdiction Name

_________________________________________  
Street and/or Mailing Address  
City  
State  
Zip Code

_________________________________________  
Signature of Alameda County Housing and Community Development Department Director  
Linda M. Gardner  

_________________________________________  
Date

_________________________________________  
Signature of Council Coordinator  
Megan H. Schatz  

_________________________________________  
Date
Appendix B

Privacy Agreement
Information about Homelessness, Outcomes and Service Engagement
...the Alameda Countywide Homeless Management Information System

InHOUSE Privacy Agreement

While I am not currently a licensed user of the Alameda County InHOUSE system, I am collecting HUD mandated data for entry into that system and/or utilizing collected data that contains sensitive personal information about clients. As a data collection participant, I agree to uphold the confidentiality and privacy standards set forth in this document, excerpted from the HUD HMIS Standards and the Alameda County-wide InHOUSE Policies and Procedures Manual.

Please initial each statement below to indicate your agreement:

____ I recognize I have access to confidential client information collected for the InHOUSE system.

____ I recognize that I am bound to keep confidential all protected personal information with which I come in contact in the course of carrying out my job responsibilities.

____ I recognize that the improper disclosure of confidential and protected personal information, by anyone, could result in violation of the laws, violation of a client’s legal rights and could jeopardize the security of the InHOUSE system.

____ I recognize that any improper disclosure or violation of confidential or protected information may result in disciplinary action and/or termination from any contracts/agreements with the Alameda County-wide Continuum of Care Council with which my employer may be associated, and possible termination of my employment.

____ I agree to make no disclosure, except to authorized agency staff as necessary to the performance of my job duties, to anyone of any data in, to go in, or from the InHOUSE system.

____ I will not solicit information from Clients unless the information is required for a legitimate business purpose such as to provide services to the Client.

____ I will not decline services to a Client or potential Client if that person refuses to share their personal information with other agencies via InHOUSE.

____ Upon Client written request, I will ensure a Client receives a copy of the Client’s own information maintained within InHOUSE. Information compiled in reasonable anticipation of or for use in a civil, criminal or administrative action or proceeding need not be provided to Client.

____ I will permit Clients to file a written complaint regarding the use or treatment of their information within InHOUSE. Client may file a written complaint within the Agency Grievance Procedure. Client may not be retaliated against for filing a complaint.

____ I understand that all InHOUSE information (hard copies and soft copies) must be kept secure and confidential at all times. When no longer needed, the information must be destroyed according to written Policy and Procedures to maintain confidentiality.

I understand and agree to comply with all the confidentiality statements listed above. I agree to maintain strict confidentiality of information obtained for the InHOUSE system. This information will be used only for the legitimate client service and administration of the agency named below.

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<tr>
<th>InHOUSE Participant Signature</th>
<th>Agency</th>
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Agency/System Administrator

<table>
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<th>Date</th>
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01.05.04
Appendix C

User Agreement
InHOUSE USER AGREEMENT

POLICY, RESPONSIBILITIES, & CODE OF ETHICS

USER POLICY

The Alameda Countywide Homeless Management Information System named InHOUSE (Information about Homelessness, Outcomes and Service Engagement), is a collaborative project that will enable homeless service providers to collect uniform client information over time. Participating Agencies in the InHOUSE system shall share information for provision of services to homeless persons through a networked infrastructure that establishes electronic communication among the Participating Agencies. This system is essential to efforts that streamline client services, continually improve the quality of homeless and housing services, and inform public policy. Through InHOUSE, homeless clients benefit from reduced intake processes, improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through InHOUSE is critical to accurately estimate the size, characteristics, and needs of the homeless population to inform service and systems planning, funding and advocacy.

The Client and his/her needs are a primary consideration in the design and management of the Alameda Countywide InHOUSE system. This includes the need to vigilantly maintain client confidentiality and treat personal data with significant respect and care. As the guardians entrusted with this personal data, InHOUSE users have a moral and legal obligation to ensure that the data they collect is being collected, accessed and used appropriately. It is also the responsibility of each user to ensure that client data uses and benefits are made explicitly clear to service users, and only used to those ends for which it was collected. Proper user training, adherence to the InHOUSE Policies and Procedures, and strict protection of client confidentiality are vital to the overall InHOUSE system. The InHOUSE system is a tool to assist agencies in focusing services and locating alternative resources to help homeless persons. Therefore, agency staff should use the Client information in InHOUSE to target services to the Client's needs.

The Client Release of Information Authorization form must be signed by Client before any information that identifies the Client (name, social security number, etc.) is searched for or entered into InHOUSE in a shared portion of the database. For each new Client, User shall insure that prior to obtaining Client's signature, the What is InHOUSE? and Client Release of Information Authorization forms were fully reviewed with Client such that the Client fully understood the information.

Partner Agencies shall have rights to data in InHOUSE pertaining to their clients that was created or entered by them. Partner Agencies shall be bound by all restrictions imposed by clients, privacy and security policies, and applicable laws pertaining to the use of personal data.

Minimum data entry for each Client will include:
- Completing the section(s) containing the HUD data elements

Data necessary for the development of aggregate reports of homeless services, including Annual Progress Reports, service needs, services provided, referrals and Client goals and outcomes will require data entry for all of the InHOUSE data sets and relevant forms including but not limited to the Standardized Intake, Program Entry/Exit, and Custom Assessment forms.
USER RESPONSIBILITY

User must be prepared to answer Client questions regarding the InHOUSE system.

User must faithfully respect Client preferences with regard to the entry of Client information within InHOUSE.

User must accurately record Client's preferences by making the proper designations for sharing of Client information and/or any restrictions on the sharing of Client information.

User must allow Client to change his or her information sharing preferences at the Client's request.

User must not decline services to a Client or potential Client if that person refuses to share the Intake information with other agencies via InHOUSE.

The User has primary responsibility for information entered by the User. Information entered by User must be truthful, accurate and complete to the best of User's knowledge.

User will not solicit from or enter information about Clients into InHOUSE unless the information is required for a legitimate business purpose such as to provide services to the Client.

Users will not alter or delete information entered by another Agency.

User will not use the InHOUSE database for any violation of any law, to defraud any entity or conduct any illegal activity.

Upon Client written request, User must allow a Client to inspect and obtain a copy of the Client's own information maintained within InHOUSE. Information requested by the Client to be compiled in reasonable anticipation of or for use in a civil, criminal or administrative action or proceeding need not be provided to Client.

User must permit Clients to file a written complaint regarding the use or treatment of their information within InHOUSE. Client may file a written complaint within the Agency/Jurisdiction Grievance Procedure. Client may not be retaliated against for filing a complaint.

The protection of confidentiality is critically important in the InHOUSE system. Your User ID and Password give you access to the InHOUSE system and must not be disclosed or shared.

Initial each item below to indicate your understanding and acceptance of the confidentiality protection measures and the proper use of your User ID and password. Failure to uphold the confidentiality standards set forth below is grounds for downgrading your access, immediate termination from the InHOUSE system, and/or potential termination from employment.

I understand that an InHOUSE Privacy and Security Certification training must be successfully completed before I administer Intake and Release of Authorization Forms.

I must successfully complete a ServicePoint User Training before I receive my username and password to the InHOUSE system.

I have read and will abide by all the InHOUSE Policies and Procedures.

I understand that my User ID and Password are for my use only and must not be shared with anyone, including other staff members.
I must take all reasonable measures to keep my Password physically secure.

I understand that my User ID and Password will terminate should I move employment and will not be passed on to the new staff member or transferred to my new employer.

I understand that the Client Release of Information Authorization form must be signed by the Client before any identifiable Client information is searched for, entered into InHOUSE, or designated in InHOUSE for sharing with any Partner Agencies.

I will not knowingly enter malicious or erroneous information into the InHOUSE system.

I understand that I may only view, obtain, disclose, or use the database information that is necessary to perform my job.

I understand that the only individuals who can view information in the InHOUSE system are authorized users and the Clients to whom the information pertains.

A computer that has the InHOUSE “open and running” shall never be left unattended.

If I am logged into InHOUSE and must leave the work area where the computer is located, I **must log-off** of the software application before leaving the work area.

A computer that has the InHOUSE system “open and running” must have a password protected screen saver installed.

A computer that has the InHOUSE system “open and running” shall never be physically arranged so that unauthorized individuals may see the information on the screen.

Failure to log off the InHOUSE system appropriately and leaving the system exposed may result in a breach in client confidentiality and system security, and may terminate my participation in the InHOUSE system.

I understand that if I notice or suspect a security breach within the InHOUSE system, I must immediately notify my Agency Policy and Procedure Administrator (as defined in the Policies and Procedures Manual).

I understand that all InHOUSE information (hard copies and soft copies) must be kept secure and confidential at all times. When no longer needed, they must be destroyed according to written Policies and Procedures to maintain confidentiality.

I understand that these rules apply to all users of the InHOUSE system, whatever their work role or position.

**USER CODE OF ETHICS**

A. InHOUSE Users must treat Partner Agencies/Jurisdictions with respect, fairness and good faith.

B. Each User should maintain high standards of professional conduct in the capacity as an InHOUSE User.

C. The InHOUSE User has primary responsibility for his/her Client(s).
I understand and agree to comply with all the confidentiality and user ethics statements listed above. I agree to maintain strict confidentiality of information obtained for and through the InHOUSE system. This information will be used only for the legitimate client service and administration of the above named agency. Any breach of confidentiality will result in downgrading of my access, immediate termination of my participation in the InHOUSE system, and may furthermore jeopardize my employment.

InHOUSE User Signature

Date

Agency or System Administrator

Date
Appendix D

HUD Final Data Standards
Homeless Management Information System (HMIS)
Data Standards

Revised Notice

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

March 2010
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<td>4.9</td>
<td>Domestic Violence</td>
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<tr>
<td>4.10</td>
<td>Destination</td>
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<td>4.11</td>
<td>Date of Contact (required for street outreach programs only; optional for other programs)</td>
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<tr>
<td>4.12</td>
<td>Date of Engagement (required for street outreach only; optional for other programs)</td>
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<td>4.13</td>
<td>Financial Assistance Provided (required for HPRP-funded programs only; optional for all other programs)</td>
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<td>4.14</td>
<td>Housing Relocation &amp; Stabilization Services Provided (required for HPRP funded programs only; optional for all other programs)</td>
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<td>Veteran’s Information</td>
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<td>Reason for Leaving</td>
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<tr>
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</tr>
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</table>
reporting requirements while protecting the privacy and informational security of all homeless individuals.

**Process for Revising the 2004 Data Standards**

Starting in late 2007, HUD began the process of identifying potential changes to the 2004 HMIS Standards. Some changes were anticipated to occur in conjunction with HUD’s effort to revise the Annual Progress Report (APR) for Homeless Assistance Programs. (As of 2009, the Annual Progress Report will be re-named the Annual Performance Report (APR). This new title is used in the remainder of this Notice.) In addition, since the publication of the 2004 Notice, HUD has received feedback from communities that suggested the need for clarification or modification to some standards. Thus, HUD’s interest in addressing several community concerns and ensuring the alignment of the standards and the APR – along with the ongoing need to keep pace with current industry standards for technology and security – prompted a thorough re-examination of the HMIS Standards.

In order to develop recommendations for changes to the standards, HUD convened a number of work groups – comprised of HMIS administrators, homeless assistance program representatives, homelessness researchers, and legal and technical advisors. Each group focused on a specific topic, such as HMIS security, privacy, data quality, changes to the Universal and Program-Specific data elements, and potential methods for including domestic violence (DV) service provider data in homelessness reporting.

Following the work group meetings, HUD sought feedback on proposed changes from a broader audience. First, HMIS software solution providers were given the opportunity to comment in writing on proposed changes to security, data quality and software requirements. Second, as part of a HMIS Training held in Atlanta, Georgia in September 2008, HMIS administrators, CoC representatives, and other interested parties were presented with proposed changes to the HMIS Standards and given the opportunity to provide verbal and written feedback. Their feedback was collated and discussed by representatives from the work groups prior to preparation of this Notice. Input from all of
based on best practices currently being implemented at the local level. Others have been included in an effort to begin to standardize reporting on homeless clients across federal agencies.

1.2 Significant Differences between the 2004 and 2009 Notice

The key differences between the 2004 Notice and the 2009 Notice with regard to HMIS Data Standards are described below.

Program Descriptor Data Elements

The 2009 Notice adds a set of program descriptor data standards – that is, data to be collected about all homeless assistance and HPRP homelessness prevention programs in the CoC. The purpose of these new data standards is to ensure that the HMIS is the central repository for all information about homelessness in the CoC, including both programs and clients. These data elements are needed for the following HUD reports: the Annual Performance Report (APR), the Quarterly Performance Report (QPR) for HPRP funded programs, the Annual Homeless Assessment Report (AHAR) and the Housing Inventory that is submitted as part of the annual CoC application for funding.

Universal Data Elements

A new data element, Housing Status has been added in order to distinguish persons who are literally homeless from those who are at imminent risk of losing housing, or in a stable housing situation. The Universal Data elements from the 2004 notice are largely unchanged. Minor changes include: 1) response categories have been added to a number of data elements to provide more detailed information and to be consistent with other federal reporting on homeless programs; and 2) “Don’t Know” and “Refused” response categories are added for those data elements that previously did not include those responses.

Program-Specific Data Elements

In order to align the HMIS Data Standards with the proposed revisions to the APR, this Notice modifies a number of program-specific data elements. For example, certain data elements, such as Income and Sources and Non-Cash Benefits, must now be
communities in order to develop an unduplicated count of homeless people nationwide and analyze the use and effectiveness of homeless assistance services. In subsequent years, Senate and House Appropriations Committee reports have reiterated Congress’ directive to HUD to: 1) assist communities in implementing local Homeless Management Information Systems (HMIS), and 2) develop an Annual Homeless Assessment Report (AHAR) that is based on HMIS data from a representative sample of communities. Most recently, Congress renewed its support for the HMIS initiative and the AHAR in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115).

In addition to Congressional direction on HMIS, HUD, other federal agencies and the U.S. Interagency Council on Homelessness are required under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and reporting on the outcomes of federal assistance in helping homeless people to become more independent. The major congressional imperatives in HUD’s McKinney-Vento Act programs are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of these services in enabling homeless persons to become more self-sufficient; and
- Reporting to Congress on the characteristics of homeless persons and effectiveness of federal efforts to address homelessness.

For the Homelessness Prevention and Rapid Re-Housing Program, the American Recovery and Reinvestment Act of 2009 requires that “grantees receiving such assistance shall collect data on the use of the funds awarded and persons served with this assistance in the HUD Homeless Management Information System ("HMIS") or other comparable database.”
risk of losing their housing (as defined in data element 3.11, Housing Status.).
Homelessness prevention programs include those funded by HPRP and other homelessness prevention programs identified by the CoC as part of its service system.

**Contributory CoC Program:** A homeless assistance program or homelessness prevention program that contributes Protected Personal Information (PPI) or other client-level data to an HMIS.

**Contributory Non-CoC Program:** A program that is neither a homeless assistance program nor a homelessness prevention program that contributes PPI or other client-level data to an HMIS.

**Contributory HMIS Organization (CHO):** An organization that operates a contributory homeless assistance program or homelessness prevention program or contributory non-homeless assistance program.

**Data Recipient:** A person who obtains PPI from an HMIS Lead Agency or from a CHO for research or other purposes not directly related to the operation of the HMIS, CoC, HMIS Lead Agency, or CHO.

**End User (or User):** An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data in the HMIS or another administrative database from which data are periodically uploaded to the HMIS.

**Homeless Management Information System (HMIS):** The information system designated by a CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

**HMIS Lead Agency:** An organization designated by a CoC to operate the CoC’s HMIS on its behalf.

**HMIS Participating Bed:** For any residential homeless program, a bed is considered a “participating HMIS bed” if the program makes a reasonable effort to record all universal data elements on all clients served in that bed and discloses that information through agreed upon means to the HMIS Lead Agency at least once annually.
**Unduplicated Count of Homeless Persons**: An enumeration of homeless persons where each person is counted only once during a defined period of time.

**Victim Service Provider**: A nonprofit or nongovernmental organization including rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

### 1.5 Victim Service Providers

Victim service providers that are funded under HUD’s Supportive Housing Program are instructed not to disclose personally identifying data about any client for purposes of HMIS, per the requirements of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA).

HPRP subgrantees that are victim service providers must collect and record all of the data elements that are required for HPRP subgrantees on all clients served with HPRP funds in a comparable database, and should not directly or indirectly enter personally identifiable information about HPRP beneficiaries in an HMIS.

HUD does not expect victim service providers funded through other sources to disclose personally identifying information for the purposes of HMIS, therefore HMIS coverage will be calculated excluding victim service providers from the universe of homeless assistance programs.

Regardless of funding sources, Program Descriptor data for each homeless assistance program within the CoC operated by a victim service provider must be recorded in the HMIS (either by provider staff member or by the HMIS system administrator), with the exception of a street address for a facility that provides victim services to clients.
<table>
<thead>
<tr>
<th>Program Identifier</th>
<th>1 Organization Identifier</th>
<th>Program Name</th>
<th>3 Program Identifier</th>
<th>2 Organization Name</th>
<th>5 Direct Service Code</th>
<th>4 Program Name</th>
<th>6 Site Information</th>
<th>7 Continuum of Care Number</th>
<th>8 Program Type Code</th>
<th>9 Bed and Unit Inventory Information</th>
<th>10 Target Population A (Optional for all programs)</th>
<th>11 Target Population B</th>
<th>12 Method for Tracking Residential Program Occupancy</th>
<th>13 Commerce Identifier</th>
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<tr>
<th>Program Applicability</th>
<th>Data Standards</th>
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Exhibit 1.1: Summary of Program Descriptor Data Elements
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<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
<tr>
<td>All Clients</td>
<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
<tr>
<td>All Clients</td>
<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
<tr>
<td>All Clients</td>
<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
<tr>
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<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
<tr>
<td>All Clients</td>
<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
<tr>
<td>All Clients</td>
<td>COC/HUD Comprehensive Programs</td>
<td>COC/HUD Comprehensive Programs</td>
</tr>
</tbody>
</table>

### Exhibit 1.3: Summary of Program-Specific Data Elements

- **Assistance**: Financial
- **Eligibility**: Income
- **Contact**: Every
- **Exit**: Every
- **Entry**: Every
- **Program**: Funding
- **Monitoring**: Monthly
- **Assessment**: Every
- **Client**: Year
- **Eligibility**: Program
- **Income**: Source
- **Standards**: Data
<table>
<thead>
<tr>
<th>1QH Services Provided</th>
<th>1QG Reasons for Leaving</th>
<th>1QF Child's Education</th>
<th>1QF Children's Information</th>
<th>1QF Voluntary Information</th>
<th>1QG Pregnancy Status</th>
<th>1QG General Health Status</th>
<th>1QG Employment</th>
<th>1QG Employment Program</th>
<th>1QG Optional For</th>
<th>1QG Program Data Standards</th>
<th>1QG Program Data Specific Data Elements: Optional Data Elements</th>
<th>1QH Services Provided</th>
<th>1QG Reasons for Leaving</th>
<th>1QF Child's Education</th>
<th>1QF Children's Information</th>
<th>1QF Voluntary Information</th>
<th>1QG Pregnancy Status</th>
<th>1QG General Health Status</th>
<th>1QG Employment</th>
<th>1QG Employment Program</th>
<th>1QG Optional For</th>
<th>1QG Program Data Standards</th>
<th>1QG Program Data Specific Data Elements: Optional Data Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
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<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>
2.8. Program Type Code
2.9. Bed and Unit Inventory Information
2.10. Target Population A
2.11. Target Population B
2.12. Method for Tracking Residential Program Occupancy
2.13. Grantee Identifier

2.1 Organization Identifier

*Rationale:* To uniquely identify an organization that operates a CoC Program within the CoC.

*Data Source:* Automatically generated by the HMIS software.

*When Data are Collected:* The Organization Identifier is assigned once for each organization. An Organization Identifier must be associated with each CoC Program operated by the organization.

*Subjects:* All organizations operating a CoC Program within the CoC.

*Definitions and Instructions:* A unique Organization Identifier needs to be assigned to each distinct organization that operates a CoC Program. There is no specified format for this data element. The Organization Identifier can be a randomly generated number or some other code as long as each organization receives a distinct identifier that is consistently associated with that organization.

*Required Response Categories:*

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Organization Identifier</td>
<td>A unique Organization Identifier needs to be assigned to each distinct organization that operates a CoC Program. There is no specified format for this data element.</td>
</tr>
</tbody>
</table>

*Special Issues:* None.

*Changes from Previous Notice:* This is a new data element.
Data Source: Automatically generated by the software at the time the program is created in the HMIS.

When Data are Collected: The Program Identifier is assigned once for each CoC Program. The Program Identifier must be associated automatically with each client for each service record.

Subjects: All programs.

Definitions and Instructions: A unique Program Identifier needs to be assigned to each distinct CoC Program. There is no specified format for this data element. The Program Identifier can be a randomly generated number or some other code as long as each program receives a distinct identifier that is consistently associated with that program. All other program descriptor data elements must be associated with the Program Identifier.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.3 Program Identifier</td>
<td>A unique Program Identifier needs to be assigned to each distinct CoC Program. There is no specified format for this data element.</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: This is a new data element. The Program Identification Information data element in the 2004 Notice will no longer be used for HUD reporting purposes.

2.4 Program Name

Rationale: To identify the name of each CoC Program within the CoC. This can be used within the software to associate a client with a program. This name must be listed on a CoC’s Housing Inventory (if applicable), on the HUD APR for programs receiving HUD homeless assistance funding and on the HUD QPR for programs receiving HPRP funding.

Data Source: HMIS Lead Agency or program staff.
Subjects: All programs.

Definitions and Instructions: If clients can directly enroll in the program then the Direct Service code is ‘Yes.’ If the program does not enroll clients directly, then the Direct Service code is ‘No.’ CoC Programs that provide direct services to clients but do not have a formal enrollment process or period (e.g. 2-1-1 Information & Referral programs, street outreach, drop-in or day resource centers, food pantries, or other supportive services) should code ‘Yes.’

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.5. Direct Service Code</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
</tbody>
</table>

Special Issues: Software must be programmed so that only programs with ‘Yes’ in the Direct Service field can enter information about client stays or service encounters into HMIS.

Changes from Previous Notice: This is a new data element.

2.6 Site Information

Rationale: To describe the overall program configuration and the facility where the CoC Program provides most housing and/or services (i.e. the principal program service site) within the CoC.

DataSource: HMIS Lead Agency.

When Data are Collected: Data is collected once for each CoC Program but must be reviewed annually to ensure that it is up to date.

Subjects: All programs.

Definition and Instructions: Site information is collected at the program- and site-level. For each CoC Program, record the program site configuration type in accordance with the guidance below. For the principal program service site within the CoC, or the site where the greatest level of housing or services are provided, record: 1) the site address, 2) geocode, 3) site type, and 4) housing type.
building or complex that houses both persons with special needs—e.g., homeless or formerly homeless persons, persons with substance abuse problems, persons with mental illness, or persons with HIV/AIDS—and persons without any special needs.

3. Residential: special needs only. Residential housing is located within a building or complex that houses only persons with special needs—e.g., homeless or formerly homeless persons, persons with substance abuse problems, persons with mental illness, persons with HIV/AIDS, persons with a physical disability, and/or elderly persons.

2.6E Housing Type. For the principal program service site, record the appropriate housing type. Non-residential programs should select “Not applicable: non-residential program.”

1. Mass shelter/barracks. Multiple individuals and/or family households sleep in a large room with multiple beds.

2. Dormitory/hotel/motel. Most individuals and/or families share small to medium sized sleeping rooms or have private sleeping rooms. Persons may or may not share a common kitchen, common bathrooms, or both.

3. Shared housing. Most individuals and/or families reside in one or more shared housing units that house up to 8 individuals or 4 families. Each unit includes a kitchen and bath. Each family generally has a private sleeping room, though more than one individual may share sleeping space.

4. Single Room Occupancy (SRO) units. Most individuals reside in a private unit with a sleeping/living room intended for one occupant that contains no sanitary facilities or food preparation facilities, or contains either, but not both, types of facilities.

5. Single apartment (non-SRO) units. Most individuals and/or families reside in a self-contained apartment intended for one individual or family household that includes a private kitchen and bath.
Changes from Previous Notice: These data elements have been added to allow CoCs to use the HMIS to produce a Housing Inventory, Annual Performance Reports and local submissions for the Annual Homeless Assessment Report (AHAR). The site address and geocode replaces the FIPS code requirement that was part of the Program Identifier code in the 2004 Notice.

2.7 Continuum of Care Number

Rationale: To associate each CoC Program with a CoC for HUD reporting purposes.

Data Source: HMIS Lead Agency.

When Data are Collected: The CoC number is collected once for each CoC Program but must be reviewed annually and updated if there are changes to the CoC.

Subjects: All programs that directly serve clients.

Definitions and Instructions: Each CoC Program is assigned a designated HUD CoC number.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.7 Continuum of Care Code</td>
</tr>
<tr>
<td>Response Categories</td>
</tr>
<tr>
<td>HUD-assigned CoC Number</td>
</tr>
</tbody>
</table>

Special Issues: Programs that are located in more than one CoC must either establish separate programs in the HMIS for each CoC (if one HMIS covers multiple CoCs) such that each HMIS program is only associated with a single CoC or establishes separate programs in each CoC’s HMIS.

Changes from Previous Notice: The CoC number was previously included as part of the Program Identification Number and is now treated as a separate data element.

2.8 Program Type Code

Rationale: To associate each CoC Program with the specific type of service offered.

Data Source: HMIS Lead Agency.
Data Source: HMIS Lead Agency or program staff.

When Data are Collected: At least annually, or whenever inventory information changes.

Subjects: All residential homeless assistance programs.

Definitions and Instructions: One or more Bed and Unit Inventory Information records must be established for each program. Historical values are needed for the inventory in order to generate reports that relate to various reporting periods. These fields must be transactional, meaning they need to be able to record multiple values over time along with the date that the information changed.

An HMIS may track the data in a variety of ways as long as historical data is maintained, the Housing Inventory for the CoC application can be produced, and inventory data can be mapped to the linked inventory data elements described in this section. Data can be collected annually, as long as the data reflects the changes in inventory over the course of the year, rather than at only a single point in time. The inventory history should reflect changes in standard program operations, but need not reflect day-to-day fluctuations. Examples of housing inventory changes that should be tracked historically include: the addition or removal of a group of new beds or units; the addition or removal of seasonal beds that are available for any period in the year; a program decision to target beds to a different household type; or changes in HMIS participation as a standard practice. Neglects to enter HMIS data on clients using the bed.

The inventory data elements are: Household Type, Bed Type, Availability, Bed Inventory, Unit Inventory, Inventory Start Date, Inventory End Date, HMIS Participating Beds, HMIS Participation Start Date, and HMIS Participation End Date. Permanent supportive housing programs must also record the Chronic Homeless Bed inventory.

Records must be established for each program depending on the combination of Household Types served, Bed Types, and Availability as described in 2.9A, 2.9B, and 2.9C. A program that serves both households without children and households with children will have at least two Bed and Unit Inventory information records in order to track inventory information by household type. If a program provides different types of beds (e.g., year-round and seasonal) then a separate record is established for each bed type. For example, a program that serves single adults and has 100 beds, of which 20 are
2.9A Household Type. This data element describes the household type served by beds and units counted in the Bed and Unit Inventory Information data elements. If some or all beds and units are not designated exclusively for a particular type of household, then record the household type most frequently served by the associated beds and units. For purposes of this data element, persons 18 and over are considered adults and persons under 18 are children. Record the household type for the associated beds and units as follows:

1. *Households without children.* Beds and units are intended for households with adults only. This includes households composed of unaccompanied adults and multiple adults.

2. *Households with children.* Beds and units are intended for households with (at least) one adult and one child, or households with an unaccompanied youth only, or households with multiple children only (e.g., juvenile parent and child).

2.9B Bed Type. The Bed Type describes the type of program beds based on whether beds are: located in a residential homeless assistance program facility (including cots or mats); provided through a voucher with a hotel or motel; other types of beds. Record the bed type as follows:

1. *Facility-based.* Beds (including cots or mats) are located in a residential homeless assistance facility dedicated for use by persons who are homeless.

2. *Voucher.* Beds are located in a hotel or motel and made available by the homeless assistance program through vouchers or other forms of payment.

3. *Other.* Beds are located in a campground, church, or other facility not dedicated for use by persons who are homeless.

2.9C Availability. Describes the availability of beds based on whether beds are available on a planned basis year-round or seasonally (during a defined period of high demand), or on an ad hoc or temporary basis as demand indicates. Record the availability as follows:

1. *Year-round.* Beds are available on a year-round basis.
2.9G Inventory Start Date. The inventory start date is the date when the bed and unit inventory information first applies. This may represent the date when a change in household type, bed type, availability, bed inventory or unit inventory occurs for a given program.

2.9H Inventory End Date. The inventory end date is the date when the Bed and Unit inventory information as recorded is no longer applicable (i.e. the day after the last night when the record is applicable). This may be due to a change in household type, bed type, availability, bed inventory or unit inventory. For seasonal beds, this should reflect the projected end date for the seasonal bed inventory.

2.9I HMIS Participating Beds. This data element is an integer that tracks the total number of beds participating in HMIS as of the HMIS participation start date recorded in 2.9J. For programs that serve a mixed population without a fixed number of beds per household type, record participating beds according to instructions provided in 2.9D.

2.9J HMIS Participation Start Date. This is the date when the HMIS participating bed information first applies (i.e., the date when a change in the number of HMIS participating beds occurs for a program's Bed and Unit inventory record). The HMIS Participation Start Date is the earliest program entry date that could be associated with a client using the bed or unit.

2.9K HMIS Participation End Date. The HMIS participation end date is the date when the HMIS Participation information record is no longer applicable (i.e. the day after the last night when the number of HMIS participating beds is applicable for a program's Bed and Unit Inventory record),
Changes from Previous Notice: Although this information has been collected in the past in order to develop the Housing Inventory for the CoC application, it was not required in the 2004 Notice.

2.10 Target Population A (Optional)

Rationale: This information may be used to track bed utilization and service gaps.

Data Source: HMIS Lead Agency.

When Data are Collected: At least annually, or whenever inventory information changes.

Subjects: All residential homeless assistance programs.

Definitions and Instructions: Record the appropriate Target Population served by the program. Select only one response. A population is considered a "target population" if the program is designed to serve that population and at least three-fourths of the clients served by the program fit the target group descriptor.
1. DV: Domestic Violence victims. The program targets persons who have experienced domestic violence.

2. VET: Veterans. The program targets veterans.

3. HIV: Persons with HIV/AIDS. The program targets persons with HIV/AIDS.

4. NA: Not Applicable. The program does not target domestic violence victims, veterans, or persons with HIV/AIDS.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.11 Target Population B</td>
<td></td>
</tr>
<tr>
<td>Target Population Type</td>
<td>1 = DV: Domestic Violence victims</td>
</tr>
<tr>
<td></td>
<td>2 = VET: Veterans</td>
</tr>
<tr>
<td></td>
<td>3 = HIV: Persons with HIV/AIDS</td>
</tr>
<tr>
<td></td>
<td>4 = NA: Not Applicable</td>
</tr>
</tbody>
</table>

Special Issues: None

Changes from Previous Notice: Although this information has been collected in the past in order to develop the Housing Inventory for the CoC application, it was not required in the 2004 notice.

2.12 Method for Tracking Residential Program Occupancy

Rationale: This data element is needed to identify the method for accurately calculating program utilization and length of stay.

Data Source: HMIS Lead Agency.

When Data are Collected: Annually.

Subjects: All residential homeless assistance programs.

Definitions and Instructions: Record the method used to track the actual nights that a client stays in a program. The standard method for residential homeless assistance programs that complete APRs must be based on a comparison of program entry and exit dates. A residential program that is not required to produce an APR may alternatively
historical bed utilization data for reporting purposes; and 4) provide a mechanism to aggregate distinct nights stayed to calculate each client's total length of stay in the program. If using a bed management system to track shelter stays, the program must record every night of shelter stayed for every client served, mirroring the requirements for program entry and exit date.

**Service Transaction Model.** Programs may use a similar approach to tracking nights of shelter provided using a service transaction approach, where each night of shelter is listed as a shelter service provided to the client wherever “services received” are recorded. The service transaction model is acceptable if: 1) the program records every discrete night (or series of nights) that residential services are recorded; 2) the system maintains historical data on the residential service provided; and 3) the duration of each residential stay can be accurately determined and aggregated to calculate each client’s total length of stay in the program. If using a service transaction approach to track shelter stays, the program must record residential services mirroring the requirements for program entry and exit date.

*Changes from Previous Notice:* This is a new data element.

### 2.13 Grantee Identifier

**Rationale:** To uniquely identify HPRP grantees and subgrantees that receive funding under the American Recovery and Reinvestment Act of 2009. HPRP state and local government grantees may select one or more organizations (called “subgrantees”) to administer HPRP-funded programs. All subgrantees of a federal HPRP grantee must identify their projects with the original state or local grantee identifier as assigned by HUD.

**Data Source:** HPRP grantee or subgrantee.

**When Data Are Collected:** Data is collected once for each HPRP program but must be reviewed annually to ensure that it is up to date.

**Subjects:** All HPRP programs
3. **Universal Data Elements**

The Universal Data elements establish the baseline data collection requirements for all Contributory CoC Programs. HUD carefully weighed the reporting burden of the universal data elements against the importance of the information for producing meaningful local and federal reports. Of special concern to HUD was the reporting burden for programs that register large numbers of applicants on a daily basis, with little time to collect information from each applicant. As a result, the number of Universal Data elements was kept to a minimum.

The Universal Data standards are the basis for producing unduplicated estimates of the number of homeless people accessing services from homeless assistance providers, basic demographic characteristics of people who are homeless, and patterns of service use, including information on shelter stays and homelessness episodes over time. The universal data elements are:

3.1 Name  
3.2 Social Security Number  
3.3 Date of Birth  
3.4 Race  
3.5 Ethnicity  
3.6 Gender  
3.7 Veteran Status  
3.8 Disabling Condition  
3.9 Residence Prior to Program Entry  
3.10 Zip Code of Last Permanent Address  
3.11 Housing Status  
3.12 Program Entry Date  
3.13 Program Exit Date  
3.14 Unique Person Identification Number  
3.15 Household Identification Number
applying for services. The children do not need to be present at the time the household head applies for services. However, information should not be recorded for children under age 18 if it is indicated that these children will not be entering the program on the same day as the household head. Information for these children should be recorded when the children join the program. Information on any other adults (18 years of age or older) who are applying for services as part of the household will be obtained directly from that adult. Generally, one adult should not provide information for another adult.

3.1 Name

_Rationale:_ The first, middle, last names, and suffix should be collected to support the unique identification of each person served.

_Data Source:_ Client interview or self-administered form.

_When Data are Collected:_ Upon initial program entry or as soon as possible thereafter.

_Subjects:_ All clients.

_Definitions and Instructions:_ Four fields should be created in the HMIS database to capture the client’s full first, middle, and last names and any suffixes (e.g., John David Doe, Jr.). Programs should seek to obtain legal names only and avoid aliases or nicknames.

_Required Response Categories:_

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Name</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>First, Middle, Last, Suffix</td>
<td>John David Doe, Jr.</td>
</tr>
</tbody>
</table>

_Special Issues:_ None.

_History of Change:_

_Last Change:_ None.

3.2 Social Security Number

_Rationale:_ The collection of a client’s Social Security Number (SSN) and other personal identifying information is required for _two_ important reasons. First, unique identifiers are key to producing an accurate, unduplicated local count of homeless persons accessing
recorded, the database should fill in the missing numbers with blanks so that the numbers provided are stored in the correct place of the Social Security Number. (For example, if only the last four digits of the SSN, “123456789” are given, it should be stored as “___-___-6789” and if only the first three digits are provided, it should be stored as “123-___-___”.) This will allow maximum matching ability for partial SSNs.

Under federal law (5 U.S.C. Section 552a), a government agency cannot deny shelter or services to clients who refuse to provide their SSN, unless the requirement was in effect before 1975 or SSN is a statutory requirement for receiving services from the program. No HUD-administered McKinney-Vento Act program qualifies under this exception.

Changes from Previous Notice: None.

3.3 Date of Birth

Rationale: The date of birth can be used to calculate the age of persons served at time of program entry or at any point in receiving services. It will also support the unique identification of each person served.

Data Source: Client interview or self-administered form.

When Data are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Definitions and Instructions: Collect the month, day, and year of birth for every person served. If a client cannot remember the year of birth, ask the person’s age and calculate the approximate year of birth. If a client cannot remember the month or day of birth, record an approximate date of “01” for month and “01” for day. CoCs that already have a policy of entering another approximate date may continue this policy. Approximate dates for month and day will allow calculation of a person’s age within one year of their actual age. In another field, record the appropriate date of birth type (data quality code).

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3 Date of Birth</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

44
2 = Asian is a person having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.

3 = Black or African American is a person having origins in any of the black racial groups of Africa. Terms such as “Haitian” can be used in addition to “Black or African American.”

4 = Native Hawaiian or Other Pacific Islander is a person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

5 = White is a person having origins in any of the original peoples of Europe, the Middle East or North Africa.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race</strong></td>
</tr>
<tr>
<td><strong>Response Categories</strong></td>
</tr>
<tr>
<td>1 = American Indian or Alaska Native</td>
</tr>
<tr>
<td>2 = Asian</td>
</tr>
<tr>
<td>3 = Black or African American</td>
</tr>
<tr>
<td>4 = Native Hawaiian or Other Pacific Islander</td>
</tr>
<tr>
<td>5 = White</td>
</tr>
<tr>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: Race and Ethnicity were previously combined as a single data element with a two-part question. They are now two distinct data elements. The responses “Don’t Know” and “Refused” have been added as response categories for the Race data element.

3.5 Ethnicity

Rationale: Ethnicity is used to count the number of homeless persons who identify themselves as Hispanic or Latino.

Data Source: Client interview or self-administered form.
**Required Response Categories:**

<table>
<thead>
<tr>
<th>Universal Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3.6 Gender</strong></td>
</tr>
<tr>
<td><strong>Response Categories</strong></td>
</tr>
<tr>
<td>Gender</td>
</tr>
<tr>
<td>0 = Female</td>
</tr>
<tr>
<td>1 = Male</td>
</tr>
<tr>
<td>2 = Transgendered Male to Female</td>
</tr>
<tr>
<td>3 = Transgendered Female to Male</td>
</tr>
<tr>
<td>4 = Other</td>
</tr>
<tr>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

**Special Issues:** None

**Changes from Previous Notice:** Transgendered has been added as an official response category for the gender data element. Staff observations should not be used as the sole source of information on gender. Staff should ask for the client’s self-perceived gender identity. The responses “Other,” “Don’t Know” and “Refused” have been added as response categories for the Gender data element.

### 3.7 Veteran Status

**Rationale:** To determine the number of homeless veterans.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All adults served.

**Definitions and Instructions:** A veteran is someone who has served on active duty in the Armed Forces of the United States. This does not include inactive military reserves or the National Guard unless the person was called up to active duty.
Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.8 Disabling Condition</td>
<td></td>
</tr>
<tr>
<td>Disabling Condition</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

Special Issues: For residential homeless assistance programs, client intake as part of the program admission process must be separated from the collection of disability information in order to comply with Fair Housing laws and practices, unless this information is required to determine program eligibility or is needed to determine whether applicants need units with special features or if they have special needs related to communication.

It is possible to derive client responses to the Disabling Condition question from certain program-specific data elements if the HMIS software can automatically map those responses to the Disabling Condition data element. For example, if a client responds affirmatively to having a physical disability (Data Element 4.3), a developmental disability (Data Element 4.4), HIV/AIDS (Data Element 4.6), or a substance abuse problem (Data Element 4.8), then the response to Disabling Condition is “Yes.” If a client affirms that they have a mental health problem (Data Element 4.7) and they also affirm that the problem is expected to be of long duration and substantially impairs their ability to live independently, then the response to Disabling Condition is “Yes.” An affirmative response to Chronic Health Condition (Data Element 4.5) does not provide enough information to assess whether the response to disabling condition is “Yes.” Additional assessment is needed to determine whether the condition substantially impedes a client’s ability to live independently and could be improved by more suitable housing conditions. It is important to note that a “no” to any of the questions in 4.3, 4.4, 4.6, 4.7, or 4.8 does not automatically preclude a client from being disabled under the SSA definition. However, a “no” response may require additional assessment to determine whether a physical, emotional or mental impairment is present, whether the condition is expected to last for a long duration, and whether it significantly impedes the client’s ability to live independently.
Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9 Residence Prior to Program Entry</td>
<td>Type of Residence</td>
</tr>
<tr>
<td></td>
<td>1 = Emergency shelter, including hotel or motel paid for with emergency shelter voucher</td>
</tr>
<tr>
<td></td>
<td>2 = Transitional housing for homeless persons (including homeless youth)</td>
</tr>
<tr>
<td></td>
<td>3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab)</td>
</tr>
<tr>
<td></td>
<td>4 = Psychiatric hospital or other psychiatric facility</td>
</tr>
<tr>
<td></td>
<td>5 = Substance abuse treatment facility or detox center</td>
</tr>
<tr>
<td></td>
<td>6 = Hospital (non-psychiatric)</td>
</tr>
<tr>
<td></td>
<td>7 = Jail, prison or juvenile detention facility</td>
</tr>
<tr>
<td></td>
<td>12 = Staying or living in a family member’s room, apartment or house</td>
</tr>
<tr>
<td></td>
<td>13 = Staying or living in a friend’s room, apartment or house</td>
</tr>
<tr>
<td></td>
<td>14 = Hotel or motel paid for without emergency shelter voucher</td>
</tr>
<tr>
<td></td>
<td>15 = Foster care home or foster care group home</td>
</tr>
<tr>
<td></td>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside); inclusive of &quot;non-housing service site (outreach programs only)&quot;</td>
</tr>
<tr>
<td></td>
<td>17 = Other</td>
</tr>
<tr>
<td></td>
<td>18 = Safe Haven</td>
</tr>
<tr>
<td></td>
<td>19 = Rental by client, with VASH housing subsidy</td>
</tr>
<tr>
<td></td>
<td>20 = Rental by client, with other (non-VASH) ongoing housing subsidy</td>
</tr>
<tr>
<td></td>
<td>21 = Owned by client, with ongoing housing subsidy</td>
</tr>
<tr>
<td></td>
<td>22 = Rental by client, no ongoing housing subsidy</td>
</tr>
<tr>
<td></td>
<td>23 = Owned by client, no ongoing housing subsidy</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Length of Stay in Previous Place</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 = One week or less</td>
</tr>
<tr>
<td></td>
<td>2 = More than one week, but less than one month</td>
</tr>
<tr>
<td></td>
<td>3 = One to three months</td>
</tr>
<tr>
<td></td>
<td>4 = More than three months, but less than one year</td>
</tr>
<tr>
<td></td>
<td>5 = One year or longer</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

Special Issues: This standard does not preclude the collection of residential history information beyond the residence experienced the night prior to program admission. This data element must be recorded in a transactional field each time a client enters a program. Communities may decide whether to include additional response values as long as they can be mapped to the categories included here, including the “other” category.

Changes from Previous Notice: Response value 18, Safe Haven, has been added. A safe haven is a form of transitional supportive housing or a drop-in supportive service center.
Program Entry Date) should record the zip code of the apartment, room, or house, where the client is currently living.

Changes from Previous Notice: Zip Code Type response value 1 was changed to “Full or Partial Zip Reported”.

3.11 Housing Status

Rationale: To identify persons who, at program entry and program exit, are literally homeless; housed, but at imminent risk of losing their housing; housed, but at-risk of losing their housing; or in a stable housing situation. This data element allows programs that serve homeless and non-homeless persons to separate these two populations for reporting purposes. This data element is not intended to be used for program eligibility determination purposes, as program eligibility criteria may vary by program and/or funding source. This information can help homelessness prevention programs target their resources appropriately.

Data Source: Client interview or self-administered form.

When Data are Collected: Upon initial program entry or as soon as possible thereafter and at program exit for all programs except emergency shelters. This information may be needed prior to admission to determine program eligibility.

Subjects: All clients.

Definitions and Instructions: For each client, determine whether the client is: literally homeless; imminently losing their housing; unstably housed and at-risk of losing their housing; or stably housed at program entry and exit. A client must be coded to a single response category. For clients exiting a program, the Housing Status should reflect their housing status immediately after exiting the program as determined by the client’s housing destination and anticipated housing stability.

Persons who are literally homeless include people who at program entry or program exit are in one of the following:

- Places not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- Are experiencing housing instability, but may have one or more other temporary housing options; and
- Lack the resources or support networks to retain or obtain permanent housing.

Housing instability may be evidenced by:

- Frequent moves because of economic reasons;
- Living in the home of another because of economic hardship;
- Being evicted from a private dwelling unit (including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations);
- Living in a hotel or motel not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations;
- Living in severely overcrowded housing;
- Being discharged from a hospital or other institution; or
- Otherwise living in housing that has characteristics associated with instability and an increased risk of homelessness.

Persons who are **stably housed** are in a stable housing situation and not at risk of losing this housing (i.e., do not meet the criteria for any of the other housing response categories, per above definitions).

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.11 Housing Status</td>
<td></td>
</tr>
<tr>
<td>1 = Literally homeless</td>
<td></td>
</tr>
<tr>
<td>2 = Imminently losing their housing</td>
<td></td>
</tr>
<tr>
<td>3 = Unstably housed and at-risk of losing their housing</td>
<td></td>
</tr>
<tr>
<td>4 = Stably housed</td>
<td></td>
</tr>
<tr>
<td>8 = Don't Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>
program by the user or provider must be recorded as a new program entry date. A definition of what constitutes a break in the treatment depends on the program and needs to be defined by program staff. For example, programs that expect to see the same client on a daily (or almost daily) basis may define a break in treatment as one missed day that was not arranged in advance or three consecutive missed days for any reason. Treatment programs that are scheduled less frequently than a daily basis may define a break in treatment as one or more missed weekly sessions.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12 Program Entry Date</td>
</tr>
<tr>
<td>Program entry date</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Special Issues: Two methods are suggested below for noting and tracking supportive services provided/received by a client prior to Program Entry. It may be useful to record these service events for case management purposes although they would not be included in the APR (for a HUD funded homeless assistance program) or other reports that define clients served based on program entry and exit dates associated with the program.

Service Transaction Model. To track services provided before official program entry and/or after program exit, program staff can use the optional “Services Provided” data element described under the Program-Specific Data Element section of this Notice, if the software supports this approach. CoC Programs may select a service type from the response categories in the “Services Provided” data element to track client contacts, engagements, enrollment processes and/or screenings that occur prior to program entry and/or aftercare services provided after program exit.

Separate Program Model. Alternatively, CoC Programs may establish a separate program profile within the locally-defined profile of program types in HMIS as another option for tracking provision of services prior to program entry date. Services received by clients in a pre-program entry setting may include enrollment screening, eligibility determination, housing search assistance prior to move to residential-based programs, and/or services that are not eligible activities under the primary program’s funding.
For programs that are not required to collect program-specific data, alternate methods can be used for recording actual dates stayed in the program. HUD-funded Transitional Housing programs should use Program Exit Date to record the day that the client leaves the residential portion of the program; follow-up services can be recorded using the methods discussed under Special Issues below, but should not be reported as part of the APR.

For non-residential service programs, the exit date may represent the day a service was provided or the last date of a period of ongoing service. The exit date should coincide with the date the client is no longer considered a program participant. Programs should have a clear and consistently applied procedure for determining when a client who is receiving supportive services is no longer considered a client. For example, if a person has been receiving weekly counseling as part of an ongoing treatment program and either formally terminates his or her involvement or fails to return for counseling, the last date of service is the date of the last counseling session. If a client uses a service for just one day (i.e., starts and stops before midnight of same day, such as an outreach encounter), the entry and exit date would be the same date.

For HPRP programs the Program Exit Date may be the same as the Program Entry Date if the participation in the service begins and ends on the same day. For a client receiving short-term or medium-term rental assistance for two or more consecutive months, the Program Exit Date should be equivalent to the last day of the last month for which the rental assistance payment applies.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13 Program Exit Date</td>
<td>_ _ / _ / _ / _ _ _ _ (Month) (Day) (Year)</td>
<td>(08/31/2007)</td>
</tr>
</tbody>
</table>

**Special Issues:** Programs may choose to track client contacts or provision of service after a program exit. For example some transitional housing programs offer a period of “aftercare” or “follow up” that corresponds to a period of client contact after the client has exited the residential program component. Depending on the software, service transactions that occur after exit may be able to be tracked using the optional **Services Provided** data.
client. If the client has not been served by their program previously, a PIN is randomly generated and assigned to the client.

When Data Are Collected: Upon program entry.

Subjects: All clients.

Definition and Instructions: Assign a unique ID number to each client served. The PIN is a number automatically generated by the HMIS application. The PIN will not be based on any client-specific information, but instead should be a randomly assigned, computer-generated number.

The HMIS must have functionality to allow the HMIS Lead Agency to de-duplicate clients with distinct PINs using identifying information.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.14 Personal Identification Number</td>
<td>A PIN must be created, but there is no required format as long as there is a single unique PIN for every client served in the CoC using a consistent format and it contains no personally identifying information.</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: None.

3.15 Household Identification Number

Rationale: To count the number of households served in a program.

Data Source: Interview or staff observation that a client is participating in a program as a single person household or as a household with two or more members. May be generated automatically by the HMIS application.

When Data Are Collected: Upon any program entry.

Subjects: All clients.

Definition and Instructions: A household is a single individual or a group of persons who together apply to a CoC program for services. Assign a unique ID number to each household
4. Program-Specific Data Elements

Program-Specific Data elements provide information about the characteristics of clients, the services that are provided, and client outcomes. These data elements must be collected from all clients served by programs that are required to report this information to HUD. Specifically, programs that receive funding through HUD’s Supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program, and the homeless programs funded through the Housing Opportunities for Persons with AIDS (HOPWA) Program are required to collect most of this information in order to complete Annual Performance Reports (APRs). Likewise, programs that are funded through the Homelessness Prevention and Rapid Re-Housing Program are required to collect some of these data elements in order to submit Quarterly and Annual Performance Reports.

For programs with no such reporting requirements, these data standards are optional but recommended since they allow local Continuums of Care (CoCs) to obtain consistent information across a range of providers that can be used to plan service delivery, monitor the provision of services, and identify client outcomes. However, these data elements do not constitute a client assessment tool, and providers will need to develop their own data collection protocols in order to properly assess a client’s need for services.

The Program-Specific Data elements that are needed for HUD reporting include:

4.1 Income and Sources
4.2 Non-Cash Benefits
4.3 Physical Disability
4.4 Developmental Disability
4.5 Chronic Health Condition
4.6 HIV/AIDS
4.7 Mental Health
4.8 Substance Abuse
4.9 Domestic Violence
4.10 Destination
4.11 Date of Contact
the question. It is not HUD’s intention that clients be denied service if they refuse or are unable to supply the information; however, some information may be required by programs or public or private funders to determine eligibility for housing or services, to assess needed services, or to fulfill reporting requirements. The “Don’t Know” or “Refused” responses should not be used to indicate that the case manager or data entry person does not know the client’s response.

Finally, many of these data elements represent transactions or information that may change over time. Most Program-Specific Data elements should be captured at program entry and exit, and a few must be captured at program entry, exit, and on an annual basis. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

4.1 Income and Sources

Rationale: Income and sources of income are important for determining service needs of people at the time of program entry, determining whether they are accessing all income sources for which they are eligible, and describing the characteristics of the homeless population. Capturing the receipt of cash income from various sources will help to: ensure all income sources are counted in the calculation of total income; enable program staff to take into account the composition of income in determining needs; determine if people are receiving the mainstream program benefits to which they may be entitled; help clients apply for benefits assistance; and allow analysis of changes in the composition of income between entry and exit from the program and annual changes prior to program exit. Income data are also needed to complete APRs for all HUD funded CoC Programs, including HPRP programs.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year. Programs may decide when to collect the
<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
<th>Source of Income</th>
<th>Receiving income source?</th>
<th>Amount from Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 Income and Source</td>
<td></td>
<td>Source and Amount of Income</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial Resources</td>
<td>Income received from any source in past 30 days?</td>
<td>(i.e., employment income)</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
</tr>
<tr>
<td>1 = Earned Income</td>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 = Unemployment Insurance</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 = Supplemental Security Income (SSI)</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 = Social Security Disability Income (SSDI)</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 = Veteran's disability payment</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 = Private disability insurance</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 = Worker's compensation</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10 = Temporary Assistance for Needy Families (TANF) (or use local program name)</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11 = General Assistance (GA) (or use local program name)</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 = Retirement income from Social Security</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13 = Veteran's pension</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14 = Pension from a former job</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15 = Child support</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16 = Alimony or other spousal support</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17 = Other source</td>
<td>0 = No</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Monthly Income</td>
<td>Monthly income from all sources</td>
<td>$ _ _ _ .00</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
complete picture of their economic circumstances. This information is needed to complete APRs and QPRs for IIUD funded CoC Programs, including HPRP programs.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: For each source listed below, determine if the client received any non-cash benefits in the past 30 days. Clients may identify multiple sources of non-cash benefits. For households with more than one member, non-cash benefits should be assigned in HMIS to all members of the household for whom the benefit is intended. For example, if an entire family is enrolled in Medicaid, the “Non-cash benefits received from any source in the past 30 days” question would be assigned as “Yes” for all household members and the “Source of non-cash benefit: Medicaid health insurance program” would be assigned as “Yes” for all household members.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.2 Non-Cash Benefits</td>
<td></td>
</tr>
<tr>
<td>Non-Cash Benefit</td>
<td>Non-cash benefit received from any source in past 30 days?</td>
</tr>
<tr>
<td></td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Source of Non-cash Benefit</th>
<th>Receive Benefit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Supplemental Nutrition Assistance Program (SNAP) (Previously known as Food Stamps)</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>2 = MEDICAID health insurance program (or use local name)</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>3 = MEDICARE health insurance program (or use local name)</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>4 = State Children’s Health Insurance Program (or use local name)</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
</tbody>
</table>
Changes from Previous Notice: Under the previous notice, collection of this information was required only at program entry and program exit. Non-cash benefits information also is now required to be collected at least once annually during program enrollment, if the period between program entry and exit exceeds one year. Data collection in the 2004 Notice was limited to adults and unaccompanied youth. Also, a general question on whether any non-cash benefit has been received has been added, as well as response categories to determine if a client is receiving a non-cash benefit from each source. Response category 12 has been changed to clarify that it refers specifically to ongoing rental assistance. A new response category 14 has been added to track temporary rental assistance.

4.3 Physical Disability

Rationale: To count the number of physically disabled persons served, determine eligibility for disability benefits, and assess the need for services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).

Data Source: Client interview, self-administered form, or case manager records.

When Data Are Collected: In the course of client assessment once the individual is admitted—unless this information is needed prior to admission to determine program eligibility—at program exit, and at least once annually during program enrollment if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: In separate fields, determine (a) if the client has a physical disability, and (b) if the client is currently receiving services or treatment for this disability or received services or treatment prior to exiting the program. For the purposes of this Notice, a physical disability means a physical impairment which is (a) expected to be of long, continued and indefinite duration, (b) substantially impedes an individual's
**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.3 Physical Disability</strong></td>
<td></td>
</tr>
<tr>
<td>Physical disability</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If yes)</td>
<td></td>
</tr>
<tr>
<td>[At entry]</td>
<td></td>
</tr>
<tr>
<td>Currently receiving services or treatment for this condition?</td>
<td>0 = No</td>
</tr>
<tr>
<td>[At annual assessment and at exit]: Received services/treatment while in the program?</td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

**Special Issues:** Programs should be especially sensitive to the collection of disability information from clients under the age of 18. In households with children accompanied by an adult, children’s disability should be determined based on an interview with the adult in the household.

If the response to physical disability is yes, the case manager records must document the physical disability. Documentation includes written verification from a state-licensed professional, such as a medical service provider or a health-care provider, the Social Security Administration, or the receipt of a disability check (i.e., SSDI check or VA disability benefit check).

**Changes from Previous Notice:** Under the previous notice, collection of this information was required only at program entry, and data collection was limited to adults and unaccompanied youth. The second part of the question related to services or treatment has been added. Response categories for “Don’t Know” and “Refused” were also added to capture information when the client does not know or the client refuses to respond and to ensure consistency in data quality reporting.

**4.4 Developmental Disability**

**Rationale:** To count the number of developmentally disabled persons served, determine eligibility for disability benefits, and assess their need for services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).
by an adult, children’s disability should be determined based on an interview with the adult in the household.

If the response to developmental disability is yes, the case manager records must document the developmental disability. Documentation includes written verification from a state-licensed professional, such as a medical service provider or a health-care provider, the Social Security Administration, or the receipt of a disability check (i.e., SSDI check or VA disability benefit check).

Changes from Previous Notice: Under the previous notice, collection of this information was required only at program entry, and data collection was limited to adults and unaccompanied youth. The second part of the question related to treatment has been added. Response categories for “Don’t Know” and “Refused” were also added to capture information when the client does not know or the client refuses to respond and to ensure consistency in data quality reporting.

4.5 Chronic Health Condition

Rationale: To count the number of persons served with severe health conditions and assess their need for healthcare and other medical services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).

Data Source: Client interview, self-administered form or case manager records.

When Data Are Collected: In the course of client assessment once the individual is admitted—unless this information is needed prior to admission to determine program eligibility—at program exit, and at least once annually during program enrollment if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: In separate fields, determine (a) if the client has a chronic health condition, and (b) if the client is currently receiving services or treatment for this condition or received services or treatment prior to exiting the program. For the purposes
4.6 HIV/AIDS

Rationale: To count the number of persons served who have been diagnosed with AIDS or have tested positive for HIV and assess their need for services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).

Data Source: Client interview, self-administered form and/or case manager records.

When Data are Collected: In the course of client assessment once the individual is admitted—unless this information is needed prior to admission to determine program eligibility—at program exit, and at least once annually during program enrollment if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: In separate fields, determine if the client (a) has been diagnosed with AIDS or has tested positive for HIV, and (b) if the client is currently receiving services or treatment for this diagnosis or received services or treatment prior to exiting the program.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.6 HIV/AIDS</td>
<td></td>
</tr>
<tr>
<td>HIV / AIDS</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don't Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If yes) [At entry]</td>
<td></td>
</tr>
<tr>
<td>Currently receiving services</td>
<td>0 = No</td>
</tr>
<tr>
<td>or treatment for this condition?</td>
<td>1 = Yes</td>
</tr>
<tr>
<td>[At annual assessment and at exit]:</td>
<td>8 = Don't Know</td>
</tr>
<tr>
<td>Received services/treatment while in the program?</td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>
**Definition and Instructions:** In separate data fields, determine: (a) if the client has a mental health problem, (b) if the problem is expected to be of long-continued and indefinite duration and substantially impedes a client’s ability to live independently, and (c) if the client is currently receiving services or treatment for the condition or received services or treatment prior to exiting the program. A mental health problem may include serious depression, serious anxiety, hallucinations, violent behavior or thoughts of suicide.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental health problem</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If client has a mental health problem) Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If client has a mental health problem) {At entry}</td>
<td>0 = No</td>
</tr>
<tr>
<td>Currently receiving services or treatment for this condition?</td>
<td>1 = Yes</td>
</tr>
<tr>
<td>[At annual assessment and at exit]: Received services/treatment while in the program?</td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

**Special Issues:** Programs should be especially sensitive to the collection of disability information from clients under the age of 18. In households with children accompanied by an adult, children’s disability should be determined based on an interview with the adult in the household.

If the response to mental health condition is yes, the case manager records must document the mental health condition. Documentation includes written verification should from a state-licensed professional, such as a medical service provider or a health-care provider, the Social Security Administration, or the receipt of a disability check (i.e., SSDI check or VA disability benefit check).
| Substance abuse problem | 0 = No  
 1 = Alcohol abuse  
 2 = Drug abuse  
 3 = Both alcohol and drug abuse  
 8 = Don't Know  
 9 = Refused |
|------------------------|--------------------------------------------------|
| (If client has a substance abuse problem) Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently | 0 = No  
 1 = Yes  
 8 = Don't Know  
 9 = Refused |
| (If client has a substance abuse problem) [At entry] Currently receiving services or treatment for this condition? | 0 = No  
 1 = Yes  
 8 = Don't Know  
 9 = Refused |
| [At annual assessment and at exit]: Received services/treatment while in the program? | 0 = No  
 1 = Yes  
 8 = Don't Know  
 9 = Refused |

**Special Issues:** Programs should be especially sensitive to the collection of disability information from clients under the age of 18. In households with children accompanied by an adult, children’s disability should be determined based on an interview with the adult in the household.

**Changes from Previous Notice:** For the substance abuse data element, the “dually diagnosed” response category has been changed to “Both alcohol and drug abuse.” Under the previous Notice, collection of this information was required only at program entry, and data collection was limited to adults and unaccompanied youth. A response option of “No” was added to the “Substance abuse problem” question to ensure consistency in data quality reporting. The third part of the question related to treatment has been added. Response categories for “Don’t Know” and “Refused” were also added to capture information when the client does not know or the client refuses to respond and to ensure consistency in data quality reporting.

### 4.9 Domestic Violence

**Rationale:** Ascertaining whether a person is a victim of domestic violence is necessary to provide the person with the appropriate services to prevent further abuse and to treat the physical and psychological injuries from prior abuse. Also, ascertaining that a person may be experiencing domestic violence may be important for the safety of program staff.
4.10 Destination

Rationale: Destination is an important outcome measure needed to complete APRs and QPRs for all HUD funded CoC Programs, including HPRP programs.

Data Source: Client interview or self-administered form.

When Data Are Collected: At program exit.

Subjects: All clients served.

Definition and Instructions: Determine the response value that best describes where the client will be staying after they leave the program. For clients who will be staying with family or friends, select the response that includes the expected tenure of the destination (permanent or temporary). For rental by client and owned by client, select the response that includes the type of housing subsidy, if any, the client will be receiving. A housing subsidy may be tenant-, project- or sponsor-based and provides ongoing assistance to reduce rent burden. This includes either a housing subsidy provided through the Veterans Affairs Supportive Housing (VASH) program or other housing subsidy. Other housing subsidies may include a HUD-funded subsidy (e.g., public housing, Housing Choice Voucher or “Section 8”) or other housing subsidy (e.g., state rental assistance voucher).
destinations where no housing subsidy exists. Response categories 12 and 13 have been revised to refer specifically to destinations with temporary tenure. New response categories 19 through 21 refer to destinations that include ongoing subsidies. New response values 22 and 23 refer to destinations with permanent tenure. Finally, two other new response categories were added: “Safe Haven” and “Deceased.”

4.11 Date of Contact (required for street outreach programs only; optional for other programs)

Rationale: To record and count the number of contacts with homeless persons by street outreach programs. Needed to complete APRs for HUD-funded homeless assistance programs that conduct street outreach.

Data Source: Program staff

When Data Are Collected: Each time a client is contacted.

Subjects: All clients served.

Definition and Instructions: The definition of a client contact may vary among programs and communities. As a matter of general principle, a contact is defined as an interaction between the street outreach worker and the client. A contact may include the distribution of brochures or other materials, a verbal conversation between the street outreach worker and the client about the client’s well being or service needs, or a referral to service. For the purpose of the APR, street outreach programs must report the total number of contacts during the operating year by location of contact.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.11 Date of Contact</td>
<td></td>
</tr>
<tr>
<td>Date of contact</td>
<td><strong>/</strong>/____ <em><strong>:</strong></em></td>
</tr>
<tr>
<td></td>
<td>(Month) (Day) (Year) (Hour) (Minute) (Use 24-hour ‘military’ time)</td>
</tr>
</tbody>
</table>
**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.12 Date of Engagement</td>
</tr>
<tr>
<td><strong>Date of engagement</strong></td>
</tr>
<tr>
<td>_/<strong>/</strong></td>
</tr>
<tr>
<td>(Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

**Special Issues:** None.

**Changes from Previous Notice:** This is a new data element and is required for street outreach programs only.

**4.13 Financial Assistance Provided (required for HPRP-funded programs only; optional for all other programs)**

**Rationale:** To determine the type of financial assistance (including rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel and hotel vouchers) and amount provided during program participation. This data element is required for HPRP-funded programs only in order to complete the QFR and APR.

**Data Source:** Case manager records.

**When Data are Collected:** When HPRP financial assistance is provided as a one-time transaction and at least once every three months for participants receiving medium-term rental assistance.

**Subjects:** All clients served.

**Definition and Instructions:** Record HPRP financial assistance that is provided to a third party for the benefit of program clients. In separate fields record the following financial assistance information: start date for financial assistance, end date of financial assistance, type of financial assistance, and amount of HPRP financial assistance. Response categories for the types of financial assistance are consistent with the requirements of the HPRP Notice (FR-5307-N-01). Financial Assistance Provided data should be collected for each member of the household benefiting from HPRP financial assistance.

Programs that provide on-going rental assistance for consecutive months (i.e., short-term rental assistance for two to three months or medium-term rental assistance) must minimally enter one *Financial Assistance Provided* record for each three-month period of
Programs must record the amount of HPRP financial assistance provided for each instance of one-time or ongoing financial assistance, as described above. Programs may also choose to record information on financial assistance provided through other sources. However, this should be recorded as a separate transaction in order to distinctly record and track HPRP financial assistance payments.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Required for HPRP-Funded Programs; Optional for All Other Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.13 Financial Assistance</strong></td>
<td>Response Categories</td>
</tr>
<tr>
<td>Start Date of Financial Assistance</td>
<td>_ _ / _ / _ _ _ _ _ _ (Month) (Day) (Year)</td>
</tr>
<tr>
<td>End Date of Financial Assistance</td>
<td>_ _ / _ / _ _ _ _ _ _ (Month) (Day) (Year)</td>
</tr>
<tr>
<td>Financial Assistance Type</td>
<td>1 = Rental assistance</td>
</tr>
<tr>
<td></td>
<td>2 = Security deposits</td>
</tr>
<tr>
<td></td>
<td>3 = Utility deposits</td>
</tr>
<tr>
<td></td>
<td>4 = Utility payments</td>
</tr>
<tr>
<td></td>
<td>5 = Moving cost assistance</td>
</tr>
<tr>
<td></td>
<td>6 = Motel &amp; hotel vouchers</td>
</tr>
<tr>
<td>Financial Assistance Amount</td>
<td>$ _ _ _ .00</td>
</tr>
</tbody>
</table>

**Special Issues:** For HPRP reporting, categorization as short- or medium-term rental assistance is determined based on the number of months for which rental assistance is provided during a period of continuous program participation (as determined by the program entry and exit dates or end of reporting period). Programs also may choose to record the number of specific months for which assistance with rental or utility arrearage payments apply in order to assist with recordkeeping and compliance monitoring related to adherence to the financial assistance eligibility requirements of the HPRP Notice (FR-5307-N-01). However, this is not a requirement of this Notice.
When Data are Collected: At least once every three months during program enrollment, if the period between program entry and exit exceeds three months, and at program exit.

Subjects: All clients served.

Definition and Instructions: Services provided are those that the program provides directly for the benefit of program clients. In separate fields record the following information: start date of services, end date of services, and type of service(s) provided. Response categories for the types of housing relocation and stabilization services are consistent with the requirements of the HPRP Notice (FR-5307-N-01).

To minimize staff burden at programs that provide one-time services to clients, the program can enter the start and end dates at the same time or can specify software that automatically enters the end date as the day of or the day after the start date for clients receiving one-time services.

For data collection purposes, a period of service (determined by start and end dates) must not exceed three months and should not overlap with other recorded periods. A new service record with start and end dates must be recorded at least every three months during a period of program participation (as established by a program entry date and program exit date). Programs may decide to record services provided information for intervals less than three months (e.g. every month).

HMIS software must allow HPRP programs to record transactional data for services provided in intervals not greater than three months in order to meet HPRP reporting requirements. Each record must allow one or more types of HPRP services that were provided during the service period to be selected.

While Housing Relocation & Stabilization Services Provided data must be collected for each client receiving HPRP assistance (i.e. all members of the assisted household), data collection can either occur by entering a record for each member of the household enrolled in the program or HMIS software can automate the process of adding records to all household members whenever one member receives the service. If automated, HMIS software can only add records for other household members if the other household members have the same Household Identification Number and Housing Status at program entry as the client for whom the Housing Relocation & Stabilization
4.15C General Health Status
4.15D Pregnancy Status
4.15E Veteran’s Information
4.15F Children’s Education
4.15G Reason for Leaving
4.15H Services Provided

4.15A Employment

Rationale: To assess client’s employment status and need for employment services.

Data Source: Client interview or self-administered form.

When Data Are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year.

Subjects: All clients served or all adults and unaccompanied youth.

Definition and Instructions: In separate fields, determine: (1) if the client is currently employed; (2) if currently employed, how many hours did the client work in the last week; (3) if currently employed, is the work permanent, temporary, or seasonal; and (4) if the client is not currently working, if they are currently looking for work and/or increased work hours. Seasonal employment is work that can, by the nature of it, ordinarily only be performed during a certain season in the year. Temporary employment is work for a limited time only or for a specific piece of work and that work will last a short duration. Permanent employment is work that is contemplated to continue indefinitely.

Required Response Categories:

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.15A Employment</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Employed</strong></td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td><strong>If currently working, number of hours worked in the past week</strong></td>
<td>_____ hours</td>
</tr>
</tbody>
</table>
school diploma or General Equivalency Diploma (GED), what degree(s) has the client earned. Allow clients to identify multiple degrees.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>4.15B Education</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Currently in school or working on any degree or certificate</td>
<td>0 = No</td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
<td>9 = Refused</td>
</tr>
<tr>
<td>Received vocational training or apprenticeship certificates</td>
<td>0 = No</td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
<td>9 = Refused</td>
</tr>
<tr>
<td>Highest level of school completed</td>
<td>0 = No schooling completed</td>
<td>1 = Nursery school to 4th grade</td>
</tr>
<tr>
<td></td>
<td>2 = 5th grade or 6th grade</td>
<td>3 = 7th grade or 8th grade</td>
</tr>
<tr>
<td></td>
<td>4 = 9th grade</td>
<td>5 = 10th grade</td>
</tr>
<tr>
<td></td>
<td>6 = 11th grade</td>
<td>7 = 12th grade, No diploma</td>
</tr>
<tr>
<td></td>
<td>10 = High school diploma</td>
<td>11 = GED</td>
</tr>
<tr>
<td></td>
<td>12 = Post-secondary school</td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
<td></td>
</tr>
<tr>
<td>If client has received a high school diploma, GED or enrolled in post-secondary education, what degree(s) has the client earned</td>
<td>0 = None</td>
<td>1 = Associates Degree</td>
</tr>
<tr>
<td></td>
<td>2 = Bachelors Degree</td>
<td>3 = Masters Degree</td>
</tr>
<tr>
<td></td>
<td>4 = Doctorate Degree</td>
<td>5 = Other graduate/professional degree</td>
</tr>
<tr>
<td></td>
<td>6 = Certificate of advanced training or skilled artisan</td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** None.

**Changes from Previous Notice:** Information on education may be collected from all clients or all adults and unaccompanied youth served by the program. The previous notice recommended limiting data collection to adults and unaccompanied youth. In
when the client refuses to respond and to ensure consistency in data quality reporting. In addition, it is recommended that the revised data element be collected at program entry, program exit and on an annual basis.

4.15D Pregnancy Status

_Rationale:_ To determine eligibility for benefits and need for services, and to determine the number of women entering CoC programs while pregnant.

_Data Source:_ Client interview or self-administered form.

_When Data are Collected:_ In the course of client assessment nearest to program entry.

_Subjects:_ All females of child-bearing age served.

_Definition and Instructions:_ In separate fields, determine (a) if a client is pregnant and (b), if so, what is the due date. The due date is one field that consists of the two-digit month, two-digit day and four-digit year. If the day is unknown, programs are encouraged to record “01” as a default value. Communities that already have a policy of entering another approximate day may continue this policy. If the month is unknown, programs should leave the data field blank.

_Required Response Categories:_

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15D Pregnancy Status</td>
<td></td>
</tr>
<tr>
<td><strong>Pregnancy status</strong></td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td><strong>If yes, due date</strong></td>
<td>__ <strong>/</strong>/__ __ __ __</td>
</tr>
<tr>
<td></td>
<td>(Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

_Special Issues:_ Records for pregnant clients should be updated automatically to account for changes in clients’ pregnancy status (e.g., following the birth of a child). Using the “If yes, due date” field, the HMIS should automatically update, but not overwrite, the client’s record by changing the “Pregnancy status” field from “Yes” to “No” once the due
Required Response Categories:

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15E Veteran’s Information</td>
<td></td>
</tr>
<tr>
<td>Military service eras</td>
<td></td>
</tr>
<tr>
<td>1 = Persian Gulf Era (August 1991 – September 10, 2001)</td>
<td></td>
</tr>
<tr>
<td>2 = Post Vietnam (May 1975 – July 1991)</td>
<td></td>
</tr>
<tr>
<td>3 = Vietnam Era (August 1964 – April 1975)</td>
<td></td>
</tr>
<tr>
<td>4 = Between Korean and Vietnam War (February 1955 – July 1964)</td>
<td></td>
</tr>
<tr>
<td>5 = Korean War (June 1950 – January 1955)</td>
<td></td>
</tr>
<tr>
<td>6 = Between WWII and Korean War (August 1947 – May 1950)</td>
<td></td>
</tr>
<tr>
<td>7 = World War II (September 1940 – July 1947)</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
<tr>
<td>10 = Post September 11, 2001 (September 11, 2001 – Present)</td>
<td></td>
</tr>
<tr>
<td>Duration of active duty</td>
<td>______ months</td>
</tr>
<tr>
<td>Served in a war zone</td>
<td></td>
</tr>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
<tr>
<td>If yes, name of war zone</td>
<td></td>
</tr>
<tr>
<td>1 = Europe</td>
<td></td>
</tr>
<tr>
<td>2 = North Africa</td>
<td></td>
</tr>
<tr>
<td>3 = Vietnam</td>
<td></td>
</tr>
<tr>
<td>4 = Laos and Cambodia</td>
<td></td>
</tr>
<tr>
<td>5 = South China Sea</td>
<td></td>
</tr>
<tr>
<td>6 = China, Burma, India</td>
<td></td>
</tr>
<tr>
<td>7 = Korea</td>
<td></td>
</tr>
<tr>
<td>8 = South Pacific</td>
<td></td>
</tr>
<tr>
<td>9 = Persian Gulf</td>
<td></td>
</tr>
<tr>
<td>10 = Other</td>
<td></td>
</tr>
<tr>
<td>11 = Afghanistan</td>
<td></td>
</tr>
<tr>
<td>12 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>13 = Refused</td>
<td></td>
</tr>
<tr>
<td>If yes, number of months in war zone</td>
<td></td>
</tr>
<tr>
<td>1 = ______ Months</td>
<td></td>
</tr>
<tr>
<td>If yes, received hostile or friendly fire</td>
<td></td>
</tr>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>
When Data are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year.

Subjects: All children between 5 and 17 years of age.

Definition and Instructions: For each child, determine in separate fields: 1) if the child is currently enrolled in school; 2) if the child is currently enrolled, the name of the school; 3) if the child is currently enrolled, indicate if the child is connected with the McKinney-Vento Homeless Assistance Act school liaison; 4) the type of school; 5) if the child is not currently enrolled in school, what date was the child last enrolled in school; and 6) what problems has the head of household had in getting the child enrolled into school. The last date of enrollment consists of the two-digit month and four-digit year. If the month is unknown, programs are encouraged to record “01” as a default value. Communities that already have a policy of entering another approximate month may continue this policy. If the year is unknown, programs should leave the data field blank. When identifying the problems the head of household encountered when enrolling the child in school, allow clients to identify multiple reasons for not enrolling the child in school.

Required Response Categories:

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15F Children’s Education</td>
<td></td>
</tr>
<tr>
<td>Current enrollment status</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If yes, name of child’s school</td>
<td>(Example: Lone Pine Elementary School)</td>
</tr>
<tr>
<td>If yes, was/is the child connected to the McKinney-Vento Homeless Assistance Act school liaison?</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If yes, type of school</td>
<td>1 = Public school</td>
</tr>
<tr>
<td></td>
<td>2 = Parochial or other private school</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If not enrolled, last date of enrollment</td>
<td><strong>/____/</strong>___ (Month) (Year)</td>
</tr>
<tr>
<td>Optional Program-Specific Data Element</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>4.15G Reason for Leaving</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Response Categories</strong></td>
<td></td>
</tr>
<tr>
<td>Reason for leaving</td>
<td></td>
</tr>
<tr>
<td>1 = Left for a housing opportunity before completing program</td>
<td></td>
</tr>
<tr>
<td>2 = Completed program</td>
<td></td>
</tr>
<tr>
<td>3 = Non-payment of rent/occupancy charge</td>
<td></td>
</tr>
<tr>
<td>4 = Non-compliance with program</td>
<td></td>
</tr>
<tr>
<td>5 = Criminal activity/ destruction of property/violence</td>
<td></td>
</tr>
<tr>
<td>6 = Reached maximum time allowed by program</td>
<td></td>
</tr>
<tr>
<td>7 = Needs could not be met by program</td>
<td></td>
</tr>
<tr>
<td>8 = Disagreement with rules/persons</td>
<td></td>
</tr>
<tr>
<td>9 = Death</td>
<td></td>
</tr>
<tr>
<td>10 = Unknown/disappeared</td>
<td></td>
</tr>
<tr>
<td>11 = Other</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** None.

**Changes from Previous Notice:** Under the previous notice, this information was required for all programs; it is now optional.

### 4.15H Services Provided

**Rationale:** To determine the services provided to clients during program participation. This data element can be used to track referrals from street outreach programs. It may also be useful in identifying service gaps in a community and for meeting monitoring and reporting requirements for non-HUD funded programs.

**Data Source:** Case manager records.

**When Data are Collected:** When services are provided during the course of program participation.

**Subjects:** All clients served.

**Definition and Instructions:** Services Provided are those that the program provides directly for the benefit of program clients. For each service encounter, two types of information are recorded in separate fields. Record “date of service” as the two-digit month, two-digit day and four-digit year. Record “type of service” as one of the service types listed below.

**Required Response Categories:**
Friday,
July 30, 2004

Part II

Department of Housing and Urban Development

Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice
Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice

AGENCY: Office of the Assistant Secretary for Community Planning and Development, U.S. Department of Housing and Urban Development (HUD).

ACTION: Final notice.

SUMMARY: This notice implements data and technical standards for Homeless Management Information Systems (HMIS). The final Notice follows publication of a draft Notice on July 22, 2003.

DATES: Effective Date: August 30, 2004.

FOR FURTHER INFORMATION CONTACT: Michael Roanhouse, Office of Special Needs Assistance Programs, Office of the Assistant Secretary for Community Planning and Development, Room 7262, Department of Housing and Urban Development, 451 Seventh Street, SW, Washington, DC 20410–7000; telephone (202) 708–1226, ext. 4482 (this is not a toll-free number). Hearing- or speech-impaired individuals may access this toll-free number by calling the toll-free Federal Information Relay Service at 1–800–877–8399.

SUPPLEMENTARY INFORMATION:

I. Background—The July 22, 2003 Draft Notice

On July 22, 2003 (68 FR 43430), HUD published a draft Notice that described the data and technical standards for implementing HMIS. An HMIS is a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance services and stores that data in an electronic format.

Because an HMIS has the capacity to integrate data from all homeless service providers in the community and to capture basic descriptive information on every person served, it is a valuable resource for communities. HMIS can be employed to: better understand the characteristics of homeless persons in the community, including their demographic characteristics, patterns of homelessness, and use of services; improve the delivery of housing and services to specific sub-populations such as veterans or persons experiencing chronic homelessness; and assess and document the community’s progress in reducing homelessness.

Over the past several years, Congress has directed HUD to assist local jurisdictions in implementing HMIS and in using data from these systems to understand the size and characteristics of the homeless population, analyze local patterns of services usage, and assess local service needs. HUD’s goals for the development of local HMIS are threefold:

1. Bringing the power of technology to the day-to-day operations of individual housing and service providers;
2. Knitting together housing and service providers within a local community into more coordinated and effective delivery systems for the benefit of homeless clients; and
3. Obtaining and reporting critical aggregate information about the characteristics and service needs of homeless persons.

To achieve these goals, HUD has initiated a yearlong process to develop national data and technical standards for HMIS. The standards have been developed with extensive input from an expert panel composed of practitioners, advocates, government representatives, and researchers. The composition of the expert panel was designed to make sure that the need for addressing key policy questions would be balanced against practical considerations about the data collection environment.

A draft Notice that outlined the data and technical standards was published in July 2003, to permit Continuums of Care (CoCs) (local bodies that plan for and coordinate homeless services), homeless service providers, local and State governments, advocates, and homeless clients an opportunity to review and comment on the proposed standards. The draft Notice was divided into five sections.

Section 1, the Introduction, presented background information on the Congressional direction on improving homeless data collection and analysis at the local and national levels, and specific statutory based programmatic and planning requirements for addressing homeless needs. This section also described HUD’s major policy decisions regarding HMIS and the benefits of developing an HMIS for homeless persons, local homeless assistance providers, CoCs and national policy makers.

Section 2, the Universal Data Elements, described the data elements that are to be collected from all clients served by all homeless assistance programs reporting to the HMIS. Universal data elements (including date of birth, gender, race, ethnicity, and veteran’s status) are needed for CoCs to understand the basic dynamics of homelessness in their communities and for HUD to meet Congressional direction to develop unduplicated counts of homeless service users at the local level; describe their characteristics; and identify their use of homeless assistance and mainstream resources.

Section 3, the Program Level Data Elements (called Program-Specific Data Elements in the final Notice), described data elements that are required for programs receiving certain types of funding, but are optional for other programs. Most program-specific data elements are required for programs that receive funding under the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act) (42 U.S.C. 13101 et seq.) and complete Annual Progress Reports (APRs). In the future HUD intends to use HMIS data as a basis for grantees to complete APRs.

Finally, Section 4, Standards for Data Confidentiality and Security, and Section 5, Technical Standards, described how data are to be safeguarded and the technical requirements for HMIS applications and for the CoCs or other entities responsible for storing HMIS data.

II. Significant Differences Between the July 22, 2003, Draft Notice and This Final Notice

The final Notice takes into consideration the public comments received on the July 22, 2003 draft Notice. After reviewing the public comments, the significant changes described below have been made to the Notice.

1. The methodology for obtaining data has been made less prescriptive. The final Notice no longer prescribes a methodology for obtaining the data, as long as the definitions of the data elements are used to collect client information. This allows housing and service providers the flexibility to collect the required information in ways that are suitable for the operation of their programs and their local circumstances. For many providers, there may be very few changes in the way they already obtain information from clients.

Specifically, the data standards have been changed from a survey format that presented both recommended questions and required response categories for each data element to a format that specifies only the required response categories. The draft Notice included questions for obtaining each data element to ensure collection of consistent information across communities. To meet the same objective, the final Notice includes a definition of each data element and the required response categories, but does not mandate the procedures for...
collecting the information. Data collection procedures can be tailored to meet the circumstances of providers as long as the collected information is consistent with the definition of the data element. Also, follow-up questions and corresponding data fields for use when a client provides only partial answers have been removed. For providers that want to use the questions, they are presented in Exhibits 2 and 4 of the final Notice.

The timing of the data collection has also been made more flexible so that providers can choose the time most appropriate to collect the information. One important exception involves Disabling Condition, a data element that was added to the universal data standards in the final Notice. As discussed in the final Notice, providers are required to report a client’s disability status only after the client has been accepted into the program, unless disability is an eligibility criterion for the program (such as disability status for the Shelter Plus Care program or HIV status for the Housing Opportunities for Persons with AIDS Program). Instructions for the program-specific data standards allow providers to collect the information at the time when it makes most sense, for example, during a client needs assessment, or provision and monitoring of services, or from case management records.

Finally, the final Notice acknowledges that providers or communities can collect additional data elements to meet other information needs in the community. Also, required response categories can be disaggregated to meet local information needs, as long as the locally-developed response categories can be aggregated to the response categories for each data element in the final Notice. For example, programs may choose to collect more detailed information regarding a client’s residence prior to program entry by disaggregating the emergency shelter response category into several categories (hotel, motel, campground paid for with emergency shelter voucher, particular type of crisis shelter or runaway youth shelter). For reporting purposes, the more detailed categories must be combined into the emergency shelter response category.

2. Privacy and security standards are more flexible than in the draft Notice.

This final Notice has been revised to provide housing and service providers more flexibility in implementing privacy and security standards, while establishing minimum requirements for protecting HMIS data. The revised standards establish policies and procedures for addressing the privacy and confidentiality of information collected by HMIS, while allowing for reasonable and responsible uses and disclosures of data.

The privacy and security section provides baseline standards required of all programs that record, use or process HMIS data. The baseline standards are based on principles of fair information practices and security standards recognized by the information privacy and technology communities as appropriate for securing and protecting personal information. The section also identifies additional protocols or policies that communities may choose to adopt to further ensure the privacy and confidentiality of information collected through HMIS. Programs are encouraged to apply these additional protections as needed to protect client confidentiality. Programs may also implement other forms of protections not specified in the Notice as long as these protections do not conflict with the standards in this Notice.

The revision has been made in recognition of the broad diversity of programs involved in HMIS and the various programmatic and organizational realities that may prompt some programs to implement higher standards. While some programs (e.g., programs that serve particularly vulnerable populations) strive to implement the highest level of privacy and security standards possible because of the nature of their homeless population and/or service provision, other programs (e.g., programs that serve large numbers of clients daily) may find higher standards to be excessively prescriptive and overly burdensome. At a minimum, however, all programs must meet the baseline requirements described in the Notice.

III. Discussion of the Public Comments Received on the July 22, 2003, Draft Notice

The public comment period for the proposed Notice closed on September 22, 2003. HUD received comments on the draft Notice from 167 commenters, representing a variety of organizations and entities. Comments were received from: members of CoCs and homeless service providers; disability and domestic violence advocacy groups; homeless and low-income housing advocacy organizations; HMIS software vendors; legal and privacy organizations; Federal, State, county and city government agencies; a public housing authority; consulting firms and research organizations; and the general public. Overall, more than 1,600 distinct comments were made.

The comments expressed a wide range of viewpoints. Very few commenters expressed unqualified support for, or opposition to, the draft Notice. Instead, many commenters mixed broad statements with criticisms of specific provisions in the Notice. The statements of support frequently commended HUD for issuing the draft Notice, stating that uniform data collection and technical standards will benefit homeless persons, the programs that serve them, and the policies designed to address homelessness. Some commenters wrote that accurate HMIS data will “improve services provided to homeless families and individuals,” help agency staff to “streamline referrals and coordinated case management” and comprise “one of the cornerstones of a comprehensive plan to prevent and end homelessness.” A few commenters urged HUD to expand the scope of the draft Notice by requiring all programs affected by the Notice to share HMIS data, and some commenters recommended adding data elements or questions. However, a few commenters condemned the entire HMIS initiative as invasive of client privacy, burdensome to programs and beyond Congressional intent.

The criticisms raised by the commenters generally focused on the data collection requirements and the privacy and security standards of the draft Notice. A number of commenters expressed concerns that the data collection requirements would be burdensome to program staff or invasive of client privacy. Some commenters believed the proposed requirements would take time away from service provision and potentially discourage clients from seeking services. Other commenters expressed concerns about the implication of the draft Notice for particular subpopulations. Some commenters took the position that the collection of disability-related information and other medical information violates fair housing or privacy laws and could lead to discriminatory housing practices. Several domestic violence groups were particularly concerned with the collection of personal identifying information, and stated that the privacy standards in the Notice were inadequate to protect the safety of domestic violence victims. On the other hand, a number of commenters indicated that the security standards were overly prescriptive and costly to implement.

The following sections of this preamble present a more detailed review of the most significant concerns raised by the public in response to the
July 22, 2003, draft Notice and HUD’s response to each concern. The sections proceed as follows:

Section IV of this preamble discusses general comments on the draft Notice. Section V of this preamble discusses the comments regarding the Universal Data Elements.

Section VI of this preamble discusses the comments regarding the Program-Specific Data Elements.

Section VII of this preamble discusses the comments regarding the Privacy and Security Standards and Technical Standards.

IV. General Comments About the Draft Notice

Several commenters expressed general concerns with the draft Notice that were not associated with specific data elements or technical provisions.

Comment: HUD should not require CoCs to develop HMIS systems. Some commenters wrote that HUD should not require communities to develop HMIS, noting that HMIS could be used to track homeless people and could put some people, particularly vulnerable populations, at risk. Other commenters supported the development of local HMIS. One commenter applauded the Department’s efforts to collect better data to further improve services to homeless families and individuals. Another commenter stated that implementation of HMIS had enabled his community to better serve their consumers. Another noted the benefits of HMIS, both in terms of its ability to better inform a community’s understanding of the problem of homelessness and as a case management tool for individual providers.

HUD Response: The development of local HMIS began as a grassroots effort over 20 years ago, led by homeless program administrators in a small number of communities across the country. The positive experiences with HMIS in shaping local homeless policies and improving services to homeless clients led the Congress to authorize federal agencies to begin providing support for the local development of HMIS starting in the 1990s.

HUD recognizes that: (1) Development of HMIS can pose a burden on clients and the providers that assist them; and (2) without adequate safeguards, providing data to an HMIS could put a homeless person at risk. However, the burden of data collection must be balanced against the benefits of HMIS, including better coordination and delivery of services to homeless persons and obtaining information that can help providers and policymakers to understand the magnitude of homelessness and the needs of homeless individuals and families. Also, HUD has consulted with information privacy experts to develop privacy and confidentiality standards that are regarded as best practices and providing optional privacy protections for programs that require additional safeguards. HUD is committed to working with CoCs to ensure that adequate safeguards are in place so that information collected through HMIS is protected.

Comment: Clarify HUD’s position on the creation of a national database. A few commenters were concerned that the draft Notice contained the necessary elements to create a centralized, nationwide database. These commenters were particularly troubled by the requirement to collect personal identifying information since this information could be used to track homeless persons at the national level.

HUD Response: HUD believes that its position in the draft Notice is clear: “The HMIS initiative will include no Federal effort to track homeless people and their identifying information beyond the local level.” As stated in the final Notice, HUD will only require CoCs to report HMIS data in the aggregate and not by individual.

Comment: Funding for HMIS is not adequate. Some commenters noted that there are significant costs associated with implementing an HMIS at the local level (e.g., purchasing software and hardware, training staff, and collecting data on an on-going basis). Several commenters who represented communities with existing HMIS systems noted that significant costs would be associated with changing their system to conform with the proposed data standards. In addition, some commenters expressed concern that HUD funding for HMIS would reduce the resources available for direct services and stated that a separate funding source should be made available for HMIS.

HUD Response: Congress has authorized HUD to provide Federal funding to support the development of HMIS at the local level. Starting in 2001, Congress directed HUD to make HMIS an eligible cost under the Supportive Housing Program (SHP). Subsequently, HUD’s 2001, 2002 and 2003 CoC Notice of Funding Announcements allowed CoCs to apply for SHP funding in order to pay for the costs associated with HMIS equipment, software, computer services, managing and operating the system, analyzing HMIS data and producing reports, and training. While planning costs are not an eligible activity under SHP, some communities have used Community Development Block Grant funds to cover HMIS planning costs. (For more information on using SHP and other sources to pay for HMIS implementation, see HUD’s Homeless Management Information System: Implementation Guide, p. 56.)

Congress has also provided funding for technical assistance on the HMIS initiative. HUD has used these funds to engage experienced technical assistance providers to work with communities across the country to plan for, implement and update HMIS.

Comment: HMIS is not a good way to count homeless people. There are other ways to obtain an estimate of the number of homeless persons and their needs. Some commenters stated that HMIS is not a good way to obtain a count of the number of homeless people in a community because: (1) It only counts persons who are receiving services; and (2) it is invasive and, therefore, will discourage homeless persons from seeking services. Several commenters indicated that a number of organizations in their communities that serve homeless persons do not participate in HMIS, and as a result, their clients would not be included in the HMIS count of homeless persons. These commenters were concerned that using HMIS would lead to undercounts of homelessness and result in cuts in homeless programs. Several commenters stated that HUD could obtain an unduplicated count by conducting annual point-in-time counts of homeless persons. Other commenters stated that HUD could conduct intensive research in a small number of communities to obtain information about the number and characteristics of homeless persons.

HUD Response: HUD agrees that HMIS will not produce an unduplicated count of all homeless persons, but rather an unduplicated count of all homeless persons who use homeless assistance services and participate in HMIS. However, research has shown that, over the course of a year, a very high proportion of homeless persons will use some kind of homeless service; therefore, HMIS will capture information on most homeless persons in a community.

It was also noted that not all housing and service providers in a community participate in HMIS. Obtaining participation of all providers is critical to a comprehensive HMIS system but it will take time. In the near term, HUD will provide guidance to CoCs on how they can use existing HMIS information to estimate the number of persons who are not included in an HMIS because they use services of a non-participating
provider. Technical assistance will also be provided on building broad-based provider participation in local HMIS.

HUD disagrees that small research studies or point-in-time counts will provide information of equal or better quality to HMIS on the characteristics and needs of homeless persons. Point-in-time counts provide information on the number of people experiencing homelessness on a particular day. One of the key benefits of HMIS is that it can produce an accurate count of the number of people in a community who experience homelessness over the course of a year (or some other period of time) and their patterns of homelessness and service use.

Generally, HMIS counts reveal a much higher number of persons experiencing homelessness than point-in-time estimates, which tend to underestimate people who are homeless only for short periods.

In-depth studies are useful for probing into a particular issue, but cannot be used to understand the magnitude of homelessness across a community or beyond particular communities. HMIS can be used for this purpose and, in combination with other data sources (such as in-depth interviews), can be used to explore specific policy-relevant topics in a cost-efficient manner.

Comment: Proposed data collection requirements go beyond Congressional intent. Several commenters stated that the draft data standards go beyond Congressional intent to produce an unduplicated count of homelessness. For example, some commenters stated that questions about physical and behavioral health are irrelevant to Congressional intent and others questioned the need to collect personal identifiers to meet the directive.

HUD Response: HUD disagrees that the data standards go beyond Congressional intent. The draft and final Notice present the Congressional authority for data collection. These include two requirements: First, that HUD grantees assess client needs; and second, that the Interagency Council on Homelessness submit reports to Congress regarding how federal funds are used to meet the needs of homeless persons. Further, as described in the draft and final Notice, Congress has directed HUD (see Consolidated Appropriations Act of 2004 [Pub. L. 108–199, approved January 23, 2004], Fiscal Year [FY] 2001 H.R. Report 106–988; Pub. L. 106–377; FY 2001 Senate Report 106–410; and FY 1999 House Report 105–610) to use HMIS data to develop an unduplicated count of homeless persons and to analyze patterns of use of assistance, including how people enter and exit the homeless assistance system, and the effectiveness of such assistance. In the FY 2001 Senate Report 106–410, Congress also expressed concern about the role of mainstream income support and social services programs in addressing the problems of homelessness and has charged HUD and other agencies to identify ways in which mainstream programs can prevent homelessness among those they serve.

Moreover, it would not be possible for HUD to respond to Congressional concerns without obtaining information on the characteristics and needs of homeless persons, including the types of disabilities that may contribute to homelessness. It is also not possible for local providers to determine whether homeless clients are accessing mainstream resources without collecting Social Security Numbers (SSNs) and other personal identifying information. Section V of this preamble discusses the standards regarding the collection of SSNs in more detail.

Comment: The data required for HMIS poses a significant burden on homeless clients and service providers. A number of commenters were concerned about the amount of information to be collected from homeless clients and the personal nature of some of this information. Commenters stated that collecting the information would have numerous negative effects, including: Discouraging homeless persons from seeking services; reducing the amount of time the provider has to provide services; undermining the client/provider relationship; and discouraging non-HUD funded providers from participating in HMIS.

HUD Response: HUD acknowledges that data collection can be burdensome, especially for programs that register large numbers of people each night. In developing the data standards, every effort was made to balance the need for obtaining basic information about users of homeless assistance services against the need to avoid disrupting the provision of services. In revising the Notice, HUD reviewed all of the universal data elements and made some adjustments in order to limit data collection as much as possible. It is important to emphasize that only the universal data elements are required for all providers reporting to the HMIS. Many homeless assistance providers are already collecting much of this information as part of their intake process and for program administration purposes, including reporting to HUD and other funding sources. Further, some of this data (name, date of birth, race, and ethnicity) does not need to be re-collected every time a client re-enters a program because this information does not change between service encounters.

A subset of the program-specific data elements is required for: (1) Programs that receive HUD McKinney-Vento Act funds and complete Annual Progress Reports [APRs]; and (2) Housing Opportunities for People with AIDS (HOPWA) projects that target homeless persons and complete APRs. These data elements are consistent with the information that communities already collect and aggregate for the APRs.

There will be some additional effort required as programs adjust to the HMIS-based APR that HUD will adopt in the future.

HUD has attempted to address the burden issue by providing flexibility with respect to when and how client information is obtained. As the final Notice indicates, there is no longer a requirement that program-specific data elements be collected from clients at or shortly after intake. The information can be collected during the client assessment process, taken from client records, or recorded based upon the observations of case managers.

Comment: Clarify the special provision for domestic violence programs. Some commenters stated that HUD’s special provisions for domestic violence programs are inadequate because many victims seek services at mainstream homeless programs. Several commenters suggested an exemption from HMIS for any individual accessing homeless services who reports that he/she is, or has been, a victim of domestic violence.

However, some commenters disagreed with the special provision for domestic violence programs. These commenters stated that domestic violence providers may constitute a significant part of a CoC and, if they do not participate, the CoC will not be able to produce an accurate count of the homeless. The commenters were concerned that, if domestic violence victims are not included in a description of the local homeless population, it will not be possible to identify the level of resources needed to provide for their special needs.

HUD Response: HUD has carefully considered the special circumstances associated with victims of domestic violence and domestic violence programs with respect to participation in the HMIS. It is understood that unlike other special populations, victims of domestic violence could be physically at risk if individuals who intend to cause them harm are able to obtain personal information from an HMIS.
V. Comments Regarding Universal Data Elements

Comments about the universal data standards ranged from overall statements about reducing the number of elements to detailed suggestions for revising response categories and recommendations for adding elements. Comment: Remove some of the universal data elements to reduce the burden on providers, particularly large overnight shelters and family shelters. Several commenters indicated that the number of universal data elements should be reduced to limit the burden on shelters that serve a large number of clients every night. Some commenters stated that only the elements needed for an unduplicated count of homeless service users should be part of the required universal data elements. A few commenters suggested having two tiers of universal data elements, with a smaller number of elements for emergency shelters and the full list for other providers. Several commenters also stated that collecting all the universal data elements for each child in the family is too burdensome for providers serving large families. On the other hand, some commenters suggested adding more detailed response categories, moving some of the program-specific data elements to universal data elements or adding new data elements.

HUD Response: In developing and reviewing the universal data standards, HUD made every effort to balance the need for requiring basic information about users of homeless services against the data collection burden for service providers and clients. All of the data elements are necessary for meeting Congress’s desire for an unduplicated count of people using homeless assistance services and an analysis of the characteristics and patterns of service use of people who are homeless.

In reviewing the universal data elements, HUD identified several areas in which the Notice could be and was revised to reduce the burden of data collection for the universal data elements while still fulfilling Congressional instructions. The “Month/Year of Last Permanent Address” and “Program Event Number” data elements were dropped from the data standards due to data quality concerns and burden issues.

Requirements for obtaining follow-up information when clients could only provide partial or incomplete information were eliminated for many elements. The number of required response categories was also reduced for several data elements to facilitate the intake for each client. In addition, “Don’t Know” and “Refused” response categories were removed from almost every data element.

Finally, many of the comments on the burden of universal standards assumed that every universal data element would need to be collected each time a person uses a provider’s services or uses any service in a community that shares data across providers. This is not required. Many of the universal data elements do not change over time (e.g., SSN and birth date), so these elements only have to be collected the first time the person is served. To clarify this, we have added a column to Exhibit 1 of the final Notice, Summary of Universal Data Elements, which specifies whether the element needs to be collected the first time only or every time the person uses a service.

Comment: Universal data elements should include all information needed to determine whether a client is chronically homeless. Several commenters said that HUD’s initiative to end chronic homelessness defines a chronically homeless person as someone who has a pattern of homelessness over the past year or years and is disabled. Therefore the universal data elements need to include an indicator of whether or not the client is disabled in order to measure chronic homelessness.

HUD Response: HUD agrees that the elements needed to identify chronic homeless individuals should be part of the universal data standards. A Disabling Condition data element has been added as a universal data element for this purpose. For programs that do not require this information to determine program eligibility, this data element can be obtained from assessment of a client’s needs, by asking the client about their disability status, through observation, or through reviewing case management records kept by the provider. Where disability information is not required for program eligibility, homeless service providers must separate the client intake process for program admission from the collection of disability information in order to comply with Fair Housing laws and practices. Thus, unless the information is needed for eligibility determination, Disabling Condition should be collected only after the client has been admitted into the program.

Comment: Collection of full SSNs is unnecessary for obtaining unduplicated count of the homeless and may discourage clients from obtaining services. A number of commenters stated that collection of SSNs was unnecessary for obtaining an
unduplicated count of homeless service users. Some commenters suggested that a partial SSN (e.g., last 5 digits) should be collected and used along with other information such as name, birth date, and gender to obtain an unduplicated count. Several of the commenters also wrote that collection of SSNs infringed on a client’s privacy and would discourage clients from seeking services.

HUD Response: HUD has carefully considered commenters expressing concerns about collection of SSNs, but has concluded that the benefits of collecting SSNs outweigh the burden. Some CoCs and many individual providers already collect SSNs as part of their program operations without reporting any problems. On the contrary, many programs report that collecting SSN greatly facilitates the process of identifying clients who have been previously served. Further, the Notice explicitly states that a client who does not have or refuses to provide his/her SSN cannot be denied service for this reason unless it is a statutory requirement of the program under which the service is provided.

While name and date of birth are useful identifiers, these identifiers by themselves do not produce as accurate a method for distinguishing individual homeless persons as using SSN, since names change and people share the same date of birth. Overall, the collection of SSNs greatly improves the accuracy of deduplication.

Also, an important Congressional goal is to increase the use of mainstream programs to prevent homelessness. To achieve this goal, providers need the SSN along with the other personal identifiers in order to access mainstream services for their clients.

Comment: Transgender categories should be added to the Gender data element. Several commenters recommended adding “transgender male to female” and transgender “female to male” categories to the Gender element to provide transgender clients these options for self-identification. Some commenters also wrote that it was inappropriate to specify that providers who use transgender categories should aggregate them to “Don’t Know” for reporting purposes.

HUD Response: The final Notice allows local communities to add transgender response categories to meet their local needs, but has not made transgender response categories mandatory for the HMIS. The HMIS will be implemented by a wide variety of providers in a variety of circumstances. HUD has tried to keep mandatory reporting elements and response categories to a minimum, while allowing local communities and individual providers the flexibility to include additional response categories as appropriate for their community. However, the response categories used by local communities or individual providers must be aggregated to the required response categories for reporting purposes. For providers who add transgender categories, the responses should be aggregated to the self-identified gender of the client, for example a client who reports “transgender male to female” should be aggregated to the female category.

Comment: Drop the Zip Code of Last Permanent Address element because it is too difficult to collect. Some commenters stated that Zip Code of Last Permanent Address would not be a reliable element, because clients may not remember it because of their unstable living arrangements, cognitive problems, or simply because they have forgotten it. Commenters also raised concern about the burden of collecting last permanent street address for clients who could not recall their zip code. A few commenters suggested adding a response category for clients who report never having had a permanent address.

HUD Response: HUD does not agree that the zip code should be dropped. HUD recognizes that Zip Code of Last Permanent Address may be difficult for some clients to report accurately, but believes the information that is reported will be valuable for local communities to understand the geographic mobility of the homeless population and the effective catchment areas for service providers. For example, CoCs that currently collect this data element have used this information to raise awareness of homeless issues in communities that were disengaged previously from the CoC planning process.

In order to reduce data collection burden, one modification has been made to the data element. In the final Notice, programs are not required to collect the street address of clients who cannot recall their last permanent zip code.

Comment: Inserting an “X” for unknown digits in SSN and birth date fields is burdensome for software developers and adds extra key strokes for persons entering information. Some commenters stated that placing an “X” for each unknown date in the date field conflicts with many software applications, because they allow only numeric digits in the date fields. They suggested using an approximate date, such as January (i.e., 01) for missing month and 01 for missing day. Some commenters also wrote that placing an “X” for missing digits in the SSN field adds unnecessary key strokes and will require software developers to create nine data fields instead of one for SSN.

HUD Response: HUD agrees with these suggestions. The final Notice does not require entering an “X” for missing SSN digits and allows for approximate dates for missing month and day where appropriate.

Comment: Do not mandate “Don’t Know” and “Refused” response categories for each question. A number of commenters suggested eliminating the requirement for “Don’t Know” and “Refused” response categories for each data field in the universal and program-specific standards or making them optional fields. Some commenters pointed out that, for elements with specific data formats (e.g., birth date) or text fields (e.g., name), a second data field would be required to capture this information. Other commenters noted that these response categories would take up excess computer screen or paper form space and require the creation of additional fields. Finally, some commenters were concerned that these categories would diminish the value of some key data elements because staff and clients would check these responses for expediency, neglecting the opportunity to collect valuable information. A few commenters expressed support for having these response options for each data element.

HUD Response: HUD agrees that requiring “Don’t Know” and “Refused” response categories for every data field is an unnecessary burden. While individual providers and local communities still have the option of including these data fields, they are only required for the following elements: SSN; Veterans Status; Disability Condition; Residency Prior to Program Entry; and Zip Code of Last Permanent Address.

VI. Comments Regarding Program-Specific Data Elements

Comment: Program-specific data elements are too burdensome. Several commenters stated that too many program-specific data elements are required. Some commenters estimated that collecting the program-specific data elements would require a significant amount of time and resources, exceeding the current capacity of most programs.

HUD Response: As discussed in the general comments section, HUD is sensitive to the burden that data collection represents to homeless assistance providers. However, a misunderstanding as to which programs are required to collect program-specific
data elements contributed to concerns about burden. Many commenters thought that all providers were required to collect the program-specific data elements in addition to the universal data elements. This is not HUD’s intent. Programs that do not complete APRs are not required to collect any of the program-specific data elements.

HUD will require providers that receive McKinney-Vento or HOPE funding for homeless services and complete APRs to collect a select number of program-specific data elements. Since these data elements are necessary for APR reporting purposes, providers should be collecting much of this information already.

The standards also include optional program-specific data elements (that is, elements that are not required to complete APRs). These optional elements were included based on discussions with other Federal agencies that administer programs for homeless persons. HUD is working with these agencies to standardize, to the maximum extent possible, the data elements and definitions used by various agencies in their reporting requests of homeless providers. The long-term goal is to make reporting easier and more consistent for homeless providers who use multiple Federal programs.

HUD recognizes that the mixing of APR-required and optional program-specific data elements contributed to concerns about burden. The final Notice discusses the two types of data elements separately. Data elements 3.1 through 3.11 are needed to complete APRs. Data elements 3.12 through 3.17 are recommended for inclusion in an HMIS because they provide important additional information about homeless persons and are needed for non-HUD-funded reporting purposes.

Finally, HUD is aware that the question and answer format presented in the draft Notice contributed to concerns about burden. For each data element, the draft Notice provided a series of questions that providers would use to collect and record client information. For some APR-required data elements (e.g., Income and Sources), the questions were intended to provide a step-by-step process for making (sometimes difficult) determinations about the status of a person. The final Notice does not specify the questions to be asked.

Comment: Health-related or other sensitive client information should not be collected at intake. Commenters expressed two main concerns with the collection of health-related or other sensitive data at intake. First, several commenters stated that intake staff could not be expected to properly collect some of the program-specific data elements—in particular physical or developmental disability, behavioral health status, and experience with domestic violence—since many front-line staff are not trained to make assessments about these conditions. Commenters also wrote that program staff should not collect health-related or other sensitive information at program entry, because clients often resist such inquiries when asked by people they do not know or trust. Commenters emphasized the need to build a rapport with clients throughout the assessment process to gain their trust, correctly identify their needs, and provide the appropriate service or referral.

Some commenters suggested that collecting health-related and other sensitive client information at intake could lead to unfair and discriminatory treatment of persons with disabilities. Some of these commenters were concerned that clients would be stigmatized or possibly denied shelter or services solely on the basis of their disability status or other health condition.

HUD Response: HUD agrees with these comments. The Notice no longer allows program staff to collect health-related information (including Physical Disability, Developmental Disability, HIV/AIDS, Mental Health, and Substance Abuse) at intake, unless this information is a statutory or regulatory eligibility requirement (e.g., such as disability status for the Shelter Plus Care program or HIV status for the Housing Opportunities for Persons with AIDS program). Where disability status is not an eligibility requirement, the collection of health-related information may occur throughout the client assessment process to ensure that a client’s disability status is properly recorded. The change in the timing of data collection also creates more time for providers to build a rapport with clients.

Furthermore, HUD has made it clear throughout the final Notice that homeless service providers cannot deny services to an otherwise eligible person on the basis of his/her disability or health status. In addition, the final Notice requires programs for which disability is not an eligibility criterion to collect disability-related information only after the client has been admitted into the program.

The final Notice also contains specific language in Section 4 that requires providers to post a sign at each intake desk (or comparable location) stating the reasons for collecting this information.

Providers are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include, but is not limited to, providing a qualified sign language interpreter, readers, or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability.

In addition, providers that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program.

Comment: Unclear how the program-specific data elements relate to the APR. Some of the commenters suggested that HUD clarify the relationship between the APR and the HMIS data collection requirements. Many of these commenters indicated that the proposed data elements and required response categories were not consistent with APR reporting requirements, despite HUD’s stated intention to use HMIS data for APR reporting in the future.

HUD Response: As discussed in the general comments section, HUD anticipates moving toward an APR based on HMIS data, and therefore has made the final Notice consistent with the current APR. The response categories for several program-specific data elements (e.g., Destination and Services Received) were modified to be consistent with the APR. For example, the Destination data element contains the same places listed as response categories in the APR and asks service providers to report whether the destination is permanent or temporary and if the move involves one of HUD’s housing programs. Also, a Reason for Leaving data element was added to the program-specific data elements with response categories identical to the APR categories. Grantees that implement an HMIS in accordance with the final Notice will be able to satisfy HUD APR reporting requirements.

In addition, a cross-walk of HMIS and APR response categories is provided for both the Services Received and Destination program-specific data elements in Section 3 of this notice. The cross-walk provides guidance on how to meet APR reporting requirements using the HMIS response categories for these data elements.

As previously noted, HUD anticipates changes to the APR in the future, but not before most HUD grantees have implemented an HMIS that is compliant with this Notice. HUD will begin working with interested parties and its research and technical assistance
experts to review the current competitive SHP, Shelter Plus Care (S+C), Section 8 Moderate Rehabilitation Single Room Occupancy Program (SRO) and formula Emergency Shelter (ESG) reports in order to standardize reporting across HUD homeless programs. The changes may include provisions allowing for the electronic submission of reports.

VII. Comments Regarding Privacy/Security and Technical Standards

Comment: Some commenters stated that the privacy standards were too demanding and impractical. Others viewed the standards as too lenient. Public comments on the privacy standards were mixed. Several commenters suggested that programs will not be able to implement many of the proposed privacy standards without significant increases in staffing and funding. In particular, commenters said that it is unrealistic to expect front-line program staff to explain to each and every client how the information will be used and protected, and the advantages of providing accurate information.

Other commenters viewed the privacy standards as too lenient and were concerned about: Misuse of data by staff with access to the data; the lack of grievance procedures for investigating programs that violate privacy standards; the use of oral consent rather than written consent; and the impact of the standards on vulnerable populations, such as victims of domestic violence and persons with mental illness.

HUD Response: The wide range of public comments to the privacy standards underscores the diversity of providers and organizations involved in developing HMIS and the unique circumstances within programs that shape the various levels of privacy standards needed to protect clients. Providers that serve particularly vulnerable populations or those that conduct client assessments press for the highest possible privacy standards. Providers that serve large numbers of clients nightly and collect a limited amount of information or that have limited time to engage clients call for minimum standards that are less burdensome to implement. HUD clearly must be sensitive to all types of providers and design privacy standards that are sufficiently flexible to meet these dissimilar needs.

The final Notice addresses these differing needs by presenting the two-tiered privacy approach that is described in Section II of this preamble. Baseline privacy standards are required of all programs and balance the need to protect the confidentiality of client data with the practical realities of homeless service providers. Additional optional privacy protections are also presented for programs that choose to implement higher privacy standards because of the nature of their programs or service population. Although these additional privacy protections are optional, they are based on principles of fair information practices recognized by the information privacy community as appropriate for protecting personal information. Programs are encouraged to apply these additional protections as needed to provide a higher level of privacy when appropriate to meet local circumstances.

Comment: Security standards were too prescriptive. Some commenters objected to the security standards as overly prescriptive, particularly the proposed standards for passwords, workstation firewalls, and physical access. Some commenters stated that the password requirements were too complex for staff to remember, thus the requirement could prompt program staff to post their passwords in publicly accessible places, negating the security provided by the password. The requirement to install workstation firewalls was criticized by several commenters as cost prohibitive for agencies that are understaffed, especially in terms of information technology IT support, and underfunded. Some commenters indicated that the physical access provision requiring program staff to shut down a workstation when not in use was burdensome and unrealistic.

HUD Response: HUD agrees with these comments and has modified the security standards accordingly. The security standards in the final Notice follow the format of the privacy standards by presenting baseline requirements for all programs and additional security protections that communities may choose to implement to further ensure the security of their HMIS data. The baseline requirements are based on current information technology practices and rely on software applications that typically come with hardware purchased within recent years. For example: The password requirements have been simplified to meet minimum industry standards with the aim of reducing breaches in security from staff writing the passwords in publicly accessible areas; firewalls are not required on each individual workstation, so long as there is a firewall between that workstation and the outside world; and password-protected screen savers that automatically turn on are required to mitigate the burden of shutting down workstations.

Comment: Clarify how the privacy and security standards relate to the Health Insurance Portability and Accountability Act (HIPAA). Several commenters wanted HUD to clarify how the privacy and security standards for HMIS relate to the privacy and security rules for health information issued by the Department of Health and Human Services (HHS) under the authority of HIPAA. The commenters especially wanted clarification on how these standards would apply to homeless service providers that are not “covered entities” under HIPAA and therefore not obligated to abide by HIPAA regulations.

HUD Response: Based on input from a panel of experts (composed of homeless service providers, representatives from various federal agencies and national advocacy groups, and leading homeless researchers) and legal consultants, it is HUD’s understanding that very few homeless service providers are “covered entities” under HIPAA. When a homeless service provider is a covered entity, the provider is required to operate in accordance with HIPAA regulations. The final Notice states that such a provider is not required to comply with the HMIS privacy or security standards. Exempting HIPAA covered entities from the HMIS privacy and security rules avoids all possible conflicts between the two sets of rules. Where a homeless service provider is not a covered entity under HIPAA, it is subject to the HMIS privacy and security standards. A provider is also subject to applicable state and local privacy laws.

Although most homeless programs are not subject to HIPAA, HUD recognizes that the HIPAA privacy rule establishes a national baseline of privacy standards for most health information. Accordingly, the HIPAA privacy rule was used as a guide for developing the HMIS privacy standards. For example, both the final Notice and HIPAA seek to assure that clients’ personal information is properly protected while allowing for the flow of client information needed to provide and promote high quality services to clients. Like HIPAA, the HMIS final Notice strikes a balance between important and responsible uses of information and protecting the privacy of homeless persons who seek services. Further, both the HMIS final Notice and HIPAA are designed to recognize the unique programmatic and operational realities of a range of entities.

In several instances the HMIS baseline requirements exceed the
requirements in the HIPAA privacy rule. Where programmatic and organizational realities of certain programs (e.g., programs that register a large numbers of clients daily) would make the use of HIPAA standards impractical, the privacy standards in this Notice diverge from HIPAA. Yet, in all instances, additional protocols or policies are presented that communities may choose to adopt to further ensure the privacy and confidentiality of information collected through HMIS.

Comment: Clarify disclosure provision for law enforcement purposes. Several commenters criticized the disclosure provision for law enforcement purposes as too lax and particularly inadequate in domestic violence situations. Commenters indicated a concern that some law enforcement personnel may have abused their access to databases containing sensitive personal information in the past. Furthermore, in situations involving domestic violence, commenters said that they are aware of instances where law enforcement personnel are the abusers; thus, the provision would place victims of domestic violence at risk. Most of these commenters suggested that the uses and disclosures provision for law enforcement purposes should require a court order, court ordered warrant, or a subpoena.

HUD Response: The standards pertaining to the uses and disclosures of information were based on the standards set forth in HIPAA. The general principle in HIPAA is that a covered entity is permitted, but not required, to disclose protected health information for law enforcement purposes, without an individual's authorization, for six specified purposes or situations. HIPAA allows covered entities to disclose protected health information to a law enforcement official: (1) As required by law or in compliance with court orders, subpoenas, and administrative requests; (2) to identify or locate a suspect, fugitive, material witness, or missing person; (3) in response to a law enforcement official’s request for information about a victim or suspected victim of a crime; (4) to alert law enforcement of a person’s death, if the covered entity suspects that criminal activity caused the death; (5) when a covered entity believes that protected health information is evidence of a crime that occurred on its premises; or (6) by a covered health care provider in a medical emergency not occurring on its premises, when necessary to inform law enforcement about the commission and nature of a crime, the location of the crime or crime victims, and the perpetrator of the crime 45 CFR 164.512(f). HIPAA clearly allows disclosure of protected health information to law enforcement officials under several circumstances that do not involve court orders, warrants, or subpoenas.

In accordance with HIPAA standards, the final Notice adopts the general principle that all uses and disclosures are permissible and not mandatory, except for first party access to records and any required disclosures for oversight of compliance with HMIS privacy and security standards. However, HUD recognizes the particularly sensitive circumstances within certain programs and has made the following modifications to the final Notice. Among those permitted disclosures to law enforcement, this final Notice specifies that service providers may (but are not required to) disclose protected information in response to a law enforcement official’s oral request for the purpose of identifying or locating a suspect, fugitive, material witness, or missing person. In this case, the protected information is limited to name, address, date of birth, place of birth, SSN, and distinguishing physical characteristics. This provision is comparable to HIPAA. Furthermore, service providers may (but are not required to) disclose protected information for other law enforcement purposes to a law enforcement official if the law enforcement official: Makes a written request that is signed by a supervisory official of the law enforcement agency seeking the protected information; states that the information is relevant and material to a legitimate law enforcement investigation; identifies the protected information sought; is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and states that de-identified information could not be used to accomplish the purpose of the disclosure. This requirement is more restrictive than HIPAA.

Comment: Clarify HUD’s intention that clients not be denied service if they refuse to supply identifying information, and how data collection may prompt some clients to feel coerced into participating in the HMIS. A few commenters were concerned that the proposed standards do not require providers to explicitly inform each client that some information requests are optional and that services cannot be denied if a client refuses to provide information. The commenters indicated that clients frequently perceive a power imbalance between themselves and housing and service providers and will consequently feel compelled to provide the requested information or risk being denied services.

HUD Response: The draft Notice stated that it is not HUD’s intention that clients be denied service if they refuse to supply identifying information. HUD expects homeless service providers to attempt to collect the information specified in the final Notice for each client, but acknowledges that clients may choose not to provide information when Federal, State or local laws grant persons the right not to provide certain types of information.

HUD, other Federal agencies, State and local governments, and private funders of homeless services often require certain information to determine eligibility for housing or services or to assess needed services. This eligibility-related information is often statutory and/or regulation-based and is contained in provider agreements. Therefore, some providers are required to obtain certain information from homeless persons as a condition for receiving services. (See HUD's McKinney-Vento Act client-eligibility and assessment program requirements above). Exceptions to this requirement may occur in outreach programs to the street homeless or other nonresidential-based services such as soup kitchens. In such cases, an intake is often not taken, or even possible, and no information is required to access the service.

In addition, in some situations the potential dynamics within programs may prompt clients to feel coerced into supplying information. The final Notice has been modified to mitigate those circumstances. As discussed in previous sections, the methodology for collecting data was modified and programs are no longer required to collect sensitive data, particularly medical and health-related information, at program intake. The final Notice permits programs to collect much of this information during the client assessment process. By separating the data collection process from program entry, programs can build a relationship with clients and work to diminish any perceived power imbalances between provider and client.

In accordance with the baseline privacy standards specified in Section 4 of the Notice, providers are required to include a statement in their privacy notice that explains generally the reasons for collecting this information. Providers may use the following language to meet this standard: "We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be
required to collect some personal information by law, or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.”

VIII. Paperwork Reduction Act

The information collection requirements in this Notice have been approved by the OMB and assigned OMB control numbers 2506-0145, 2106-0112, 2506-0133 and 2506-0117, respectively. In accordance with the Paperwork Reduction Act of 1995 U.S.C. (44 U.S.C. 3501–3520), an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number.

1. Introduction to the Notice

This Notice sets forth the results of the Department’s deliberative process to develop national data and technical standards for locally administered Homeless Management Information Systems (HMIS). An HMIS is a computerized data collection application designed to capture client-level information over time on the characteristics and service needs of homeless persons. HMIS is being used increasingly by communities across the country to improve the delivery of service to homeless persons and to obtain better information about their needs. Today’s advanced HMIS applications offer homeless assistance providers the opportunity to collect information about client needs, service usage, and service outcomes. They also permit provider staff to access timely resource and referral information and to manage operations.

This Notice is divided into five parts. This Introduction describes the benefits of an HMIS for homeless persons, local homeless assistance providers, local bodies that plan for and coordinate homeless services (most frequently known as Continuums of Care [CoC]), and policy makers at the local and national levels. It also describes the statutory authority that allows HUD to prescribe HMIS data and technical standards and provides an overview of the standards and related requirements.

The next two parts of the Notice set forth the HMIS data standards. Section 2 presents the Universal data elements that HUD has determined must be collected from all clients receiving homeless assistance services. Section 3 presents Program-specific data elements that are to be collected from clients served by certain types of programs. Recommended data collection steps, required response categories, and suggested question wording are provided for each universal and program-specific data element, and, when appropriate, there is a discussion of special issues. Section 4 of the Notice describes the HMIS privacy and security standards for data confidentiality and security that apply to an HMIS and programs that collect, use, or process HMIS data. Finally, Section 5 addresses Technical standards for the creation of HMIS data systems.

This Notice is being published following a public comment period (July 22, 2003, to September 22, 2003) during which CoC planning bodies, homeless service providers, local and State governments, advocates, professional associations, homeless clients, and the general public had an opportunity to review and comment on the proposed standards.

1.1. The Benefits of a Local HMIS

The development of a local HMIS is about: (1) Bringing the power of computer technology to the day-to-day operations of individual homeless assistance providers; (2) knitting together providers within a local community in a more coordinated and effective housing and service delivery system for the benefit of homeless clients; and (3) obtaining and reporting critical aggregate information about the characteristics and needs of homeless persons.

An HMIS provides significant opportunities to improve access to, and delivery of, housing and services for people experiencing homelessness. An HMIS can accurately describe the scope of homelessness and the effectiveness of efforts to ameliorate it. An HMIS can strengthen community planning and resource allocation.

1.1.1. Benefits to Homeless Clients and Homeless Assistance Providers

An HMIS offers many specific benefits to homeless persons seeking assistance and the organizations that provide assistance. An HMIS offers front-line program staff tools for providing more effective client services through improved referrals, case management, and service coordination. If programs choose to share data about clients and services, program staff will be able to retrieve records of clients previously served, thereby streamlining the intake process. An HMIS reduces the frequency with which clients are required to complete intake forms and assessments. Homeless clients benefit directly from these service improvements as well as from the providers’ improved ability to understand the needs of homeless persons and their use of homeless assistance resources.

1.2. Policy Makers and Planners

Local policy makers, planners, and advocates can use aggregated HMIS data to demonstrate the size and characteristics of the homeless population in their communities and improve their understanding of service usage patterns by that population. HMIS data can also be used to identify and address service delivery gaps within the CoC and improve planners’ ability to link clients to mainstream programs that are essential to the prevention of homelessness and to sustaining formerly homeless people in permanent housing. Compared to other commonly used methods for gathering information on homeless persons, notably point-in-time census counts, HMIS allows local CoCs to obtain significantly better point-in-time and longitudinal data about homeless persons in their communities.

In addition, HMIS helps national policy makers and advocates to more effectively address homelessness. Congress has charged HUD with producing an Annual Homeless Assessment Report (AHAR) based on HMIS data. To carry out that responsibility, HUD has developed a representative sample of 80 jurisdictions that is helping those jurisdictions develop their HMIS, collect good quality data, and conduct analysis to support unduplicated counts of homeless service users and their characteristics at the local level. Analysis of HMIS data from the 80-jurisdiction sample will form the core of the AHAR and will enable Congress and HUD to better understand the needs of homeless persons and target Federal resources accordingly.

HUD also has responsibility for funding and monitoring several McKinney-Vento Act programs [42 U.S.C. 11301 et seq.]. Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and the reporting of outcomes of Federal assistance in helping homeless people to become more independent. HMIS will make it possible for HUD to request—and grantees to more quickly generate—information for Annual Progress Reports (APRs) that will enable...
HUD to report program results to Congress and the American public as required by the Government Performance Results Act and to meet its administrative and program responsibilities.

1.2. Statutory Authority

1.2.1. Direction to HUD on Homeless Management Information Systems

Over the past several years, Congress has expressed its concern for better local and national information about homeless persons through numerous conference and committee reports. Most recently, the Consolidated Appropriations Act of 2004 (Pub. L. 108–199, approved January 23, 2004) Conference Report (H.R. 108–401) stated: “The Congress reiterates the direction and reporting requirement included in the Senate Report regarding the collection and analysis of data to assess the effectiveness of the homeless system.”

Senate Report 108–143 stated:

The Committee remains supportive of the Department’s ongoing work on data collection and analysis within the homeless program. HUD should continue its collaborative efforts with local jurisdictions to collect an array of data on homelessness in order to analyze patterns of use of assistance, including how people enter and exit the homeless assistance system, and to assess the effectiveness of the homeless assistance system. The Committee directs HUD to take the lead in working with communities toward this end, and to analyze jurisdictional data within one year. The Committee directs HUD to report on the progress of this data collection and analysis effort by no later than May 13, 2003.

The Congress previously discussed the need for better data on homelessness in the Conference Report (H.R. Report 106–968) for Fiscal Year (FY) 2001 HUD Appropriations Act (Pub. L. 106–377, approved October 27, 2000). It stated:

The conference reiterates and endorses language included in the Senate report regarding the need for data and analysis on the extent of homelessness and the effectiveness of McKinney Act programs. "The conference concur with the importance of developing unduplicated counts of the homeless at the local level, as well as taking whatever steps are possible to draw inferences from this data about the extent and nature of homelessness in the nation as a whole. Likewise, the conference agrees that local jurisdictions should be collecting an array of data on homelessness in order to prevent duplicate counting of homeless persons, and to analyze their patterns of use of assistance, including how they enter and exit the homeless assistance system and the effectiveness of the systems. HUD is directed to take the lead in working with communities toward this end, and to analyze jurisdictional data within three years. Implementation and operation of Management Information Systems (MIS), and collection and analysis of MIS data, have been made eligible uses of Supportive Housing Program funds. The conference directs HUD to report to the Committees within six months after the date of enactment of this Act on its strategy for achieving this goal, including details on financing, implementation, and maintenance of the effort.

Congress directed HUD to take the lead in requiring every jurisdiction to have unduplicated client-level data within three years. The reasons for the emphasis and the specific directives on encouraging these systems were articulated in FY 2001 Senate Report 106–410:

The Committee believes that HUD must collect data on the extent of homelessness in America as well as the effectiveness of the McKinney homeless assistance programs in addressing this problem. The Committee believes that these programs have been in existence for some 15 years and there has never been an overall review or comprehensive analysis on the extent of homelessness or how to address it. The Committee believes that it is essential to develop an unduplicated count of homeless people, and an analysis of their patterns of use of assistance (HUD McKinney homeless assistance as well as other assistance both targeted and not targeted to homeless people), including how they enter and exit the homeless assistance system and the effectiveness of assistance.

In the FY 1999 HUD Appropriations Act, Congress directed HUD to collect data from a representative sample of existing local HMIS. Specifically, House Report 105–610 stated that HUD should:

- Collect, at a minimum, the following data: the unduplicated count of clients served; client characteristics such as age, race, disability status, units (days) and type of housing received (shelter, transitional, or permanent); and services rendered. Outcome information such as housing stability, income, and health status should be collected as well.

In the FY 2001 HUD appropriations process, Senate Report 106–410 directed HUD to build on its earlier preliminary work with communities with an advanced HMIS and continue assessing data from these communities:

To continue on an annual basis to provide a report on a nationally representative sample of jurisdictions whose local MIS data can be aggregated yearly to document the change in demographics of homelessness, demand for homeless assistance, to identify patterns in utilization of assistance, and to demonstrate the effectiveness of assistance.

The Committee instructs HUD to use these funds to contract with experienced academic institutions to analyze data and report to the agency, jurisdictions, providers, and the Committee on findings.

1.2.2 Direction to HUD and Other Federal Agencies on Homeless Data Collection

In addition to Congressional direction relating to HMIS, HUD, other Federal agencies and the Interagency Council on the Homeless are required under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and reporting on the outcomes of federal assistance in helping homeless people to become more independent. The major Congressional imperatives in HUD’s McKinney-Vento Act programs are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of the services in nurturing efforts by homeless
persons to become more self-sufficient; and

- Reporting to Congress on the characteristics and effectiveness of Federal efforts to address homelessness.

Both individually and as a whole, these provisions provide statutory imperatives for collecting comprehensive data on homeless individuals and their needs. This section progresses from the most general of the statutory authorities to the most specific programmatic authorities.

**Interagency Council on the Homeless.** The McKinney-Vento Homeless Assistance Act directs the Interagency Council on the Homeless (ICH) to undertake a number of tasks on interagency coordination, evaluation, and reporting that mandate the collection and dissemination of information on homeless individuals and their needs:

(a) Duties.

- The Council shall—
  1. Review all Federal activities and programs to assist homeless individuals;
  2. Take such actions as may be necessary to reduce duplication among programs and activities by Federal agencies to assist homeless individuals;
  3. Monitor, evaluate, and recommend improvements in programs and activities to assist homeless individuals conducted by Federal agencies, State and local governments, and private voluntary organizations;
  4. Collect and disseminate information relating to homeless individuals;
  5. Prepare the annual reports required in subsection (c)(2) of this section; (Section 203(a), McKinney-Vento Homeless Assistance Act).

Each Federal agency is required to report to the ICH: A description of each program to assist homeless individuals and the number of homeless individuals served by the program; impediments to use of the program by homeless individuals; and efforts by the agency to increase homeless assistance services. The ICH, in turn, is required to submit an annual report to the President and Congress that:

(A) Assesses the nature and extent of the problems relating to homelessness and the needs of homeless individuals;
(B) Provides a comprehensive and detailed description of the activities and accomplishments of the Federal Government in resolving the problems and meeting the needs assessed pursuant to subparagraph (A); (Section 203(a), McKinney-Vento Homeless Assistance Act)

In the following excerpt from the 2001 Senate Report on the HUD Appropriations Act, at page 53, Congress further directed the revised ICH to assess how mainstream programs can prevent homelessness.

ICH to assess how mainstream programs can prevent homelessness.

The committee also recognizes that homelessness cannot be eradicated by homeless assistance providers alone—it requires the involvement of a range of Federal programs. Accordingly, it has included $500,000 for the staffing of the Interagency Council on the Homeless. It instructs the Council specifically to require HUD, HHS, Labor, and VA to quantify the number of their program participants who become homeless, to address ways in which mainstream programs can prevent homelessness among those they serve, and to describe specifically how they provide assistance to people who are homeless* * *

**Comprehensive Housing Affordability Strategy/Consolidated Plan.** Every jurisdiction that receives funding from certain HUD programs (HOME, Community Development Block Grant, Housing Opportunities for Persons with AIDS, Emergency Shelter Grants) must submit a comprehensive housing strategy that includes a Consolidated Plan section dealing with homeless needs and an analysis of impediments to fair housing choice. Every jurisdiction is required to:

Describe the nature and extent of homelessness, including rural homelessness, within the jurisdiction, providing an estimate of the special needs of various categories of persons who are homeless or threatened with homelessness, including tabular presentation of such information; and a description of the jurisdiction's strategy for (A) helping low-income families avoid becoming homeless; (B) addressing the emergency shelter and transitional housing needs of homeless persons (including a brief inventory of facilities and services that meet such needs within that jurisdiction); and (C) helping homeless persons make the transition to permanent housing and independent living. (Section 106(a)(2), Cranston-Gonzalez National Affordable Housing Act 42 U.S.C. 12701 et seq.)

The implementing regulations and administrative directions detail how the 50 states, Puerto Rico, the U.S. territories and over 1000 metropolitan cities and urban counties present narratives and data tables on homeless needs, current services, and the plans to address and prevent homelessness. HUD's McKinney-Vento Act Program Requirements. The McKinney-Vento Act contains a consistent philosophy and an accompanying set of statutory mandates concerning the framework for assessing homeless needs and addressing them with appropriate services. The McKinney-Vento Act also recognizes the importance of ensuring confidentiality in recordkeeping and public disclosure of information concerning homeless persons seeking domestic violence shelter and services. In addition, all of

HUD’s McKinney-Vento Act assistance must be consistent with the local jurisdiction’s Consolidated Plan. Emergency Shelter Grants (ESG) Program. Each governmental and nonprofit recipient of ESG funds is required to certify to HUD that it will undertake certain responsibilities regarding the provision of services, including that:

* * * * *

(3) I will assist homeless individuals in obtaining—

(A) Appropriate supportive services, including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living; and

(B) Other Federal, State, local, and private assistance available for such individuals; * * * * *

(5) It will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under this subtitile and that the address or location of any family violence shelter project assisted under this subtitle will, except with written authorization of the person or persons responsible for the operation of such shelter, not be made public; and

(6) Activities undertaken by the recipient with assistance under this subtitile are consistent with any housing strategy submitted by the grantees in accordance with Section 106 of the Cranston-Gonzalez National Affordable Housing Act (Sections 415c)(3), (5) and (6), McKinney-Vento Homeless Assistance Act).

**Supportive Housing Program.** The Supportive Housing Program (SHP) funds transitional and permanent supportive housing and supportive services only projects that require grant recipients to collect specific information from clients concerning their qualification for services, their service needs, and progress toward assisting clients to independent living. HUD requires projects to report on the number and characteristics of clients served and their outcomes.

The statute provides that:

(a) IN GENERAL—To the extent practicable, each project shall provide supportive services for residents of the project and homeless persons using the project, which may be designed by the recipient or participants.

(b) REQUIREMENTS—Supportive services provided in connection with a project shall address the special needs of individuals (such as homeless persons with disabilities and homeless families with children) intended to be served by a project (Section 425(a) and (b), McKinney-Vento Homeless Assistance Act).

The McKinney-Vento Act requires every project in the Supportive Housing
Program to conduct an on-going assessment of client needs for services and their availability for the client. This information is necessary to assess the progress of the project in moving clients to independent living and to report to HUD. In addition, special protections on confidentiality of recordkeeping involving persons provided domestic violence services are specified.

Section 426 of the McKinney-Vento Homeless Assistance Act provides that—

(c) REQUIRED AGREEMENTS—The Secretary may not provide assistance for any project under this subtitle unless the applicant agrees—

(1) To operate the proposed project in accordance with the provisions of this subtitle;

(2) To conduct an ongoing assessment of the supportive services required by homeless individuals served by the project and the availability of such services to such individuals;

(3) To provide such residential supervision as the Secretary determines is necessary to facilitate the adequate provision of supportive services to the residents and users of the project;

(4) To monitor and report to the Secretary on the progress of the project;

(5) To develop and implement procedures to ensure (A) the confidentiality of records pertaining to any individual provided family violence prevention or treatment services through any project assisted through this subtitle, and (B) that the address or location of any family violence shelter project assisted under this subtitle will not be made public, except with written authorization of the person or persons responsible for the operation of such project;

(7) To comply with such other terms and conditions as the Secretary may establish to carry out this subtitle in an effective and efficient manner.

Shelter Plus Care (S+C) Program. The Shelter Plus Care (S+C) Program funds tenant-, sponsor-, and project-based rental assistance and rental assistance in connection with moderate rehabilitation for single-room occupancy units in conjunction with supportive services funded from other sources for homeless persons with disabilities. Specific information is required to establish both the initial disability status of the client to enter the program and to ensure that appropriate supportive services are provided during the full term of the program to address the needs of the client and to meet the match requirement of the program.

Section 454(b) of the McKinney-Vento Homeless Assistance Act provides in part that:

(e) MINIMUM CONTENTS—The Secretary shall require that an application identify the need for the assistance in the community to be served and shall contain at a minimum—

(2) A description of the size and characteristics of the population of eligible persons;

(4) The identity of the proposed service provider or providers;

(5) A description of the supportive services that the applicant proposes to assure will be available for eligible persons;

(6) A description of the resources that are expected to be made available to provide the supportive services required by section 453;

(7) A description of the mechanisms for developing a housing and supportive services plan for each person and for monitoring each person's progress in meeting that plan.

The McKinney-Vento Act also requires recipients to provide for ongoing client assessments and provision of needed services. Section 456 states that the Secretary may not approve assistance under this subtitle unless the applicant agrees

(1) To operate the proposed project in accordance with the provisions of this subtitle;

(2) To conduct an ongoing assessment of the housing assistance and supportive services required by the participants in the program;

(3) To assure the adequate provision of supportive services to the participants in the program.

1.3. Development of Systems and Software

With Congressional support, HUD has been encouraging local CoCs to implement HMIS. Since 2001, the implementation of HMIS has been a fundable activity for CoCs under the Supportive Housing program, and since 2002, making progress towards implementing an HMIS has been part of HUD's review of the CoC applications.

Before implementation of an HMIS became a federal initiative, some communities had already developed sophisticated client-level information systems based on the technology of the time. Some of these were management systems for large local government programs (e.g., New York, Philadelphia). Others linked decentralized service providers around a centralized bed registry (e.g., St. Louis) or an information and referral system. The success of these pioneering data management systems has prompted an increasing number of CoCs to develop similar systems to meet the needs of their clients and participating service providers. Software companies are developing specialized systems capable of documenting client demographic data, storing information on clients needs and on case management or treatment plans, identifying available services and tracking referrals, and monitoring service provision, progress, outcomes, and follow-up.

Reflecting experiences at both local and national levels to develop and test first-generation HMIS software, today's most advanced HMIS software combines a number of functions to enhance individual service provider operations and to link providers together into a broader CoC data system. These functions include:

Client Profile: Client demographic data obtained at intake and exit.

Client Assessment: Information on clients' needs and goals, as well as case management or treatment plans.

Service Outcomes: Client-level data on services provided, progress, outcomes, and follow-up.

Information and Referral/Resource Directory: Timely data on the network of available services within the Continuum to determine eligibility and provide referrals. Some systems provide documentation and tracking of a referral from one provider to the next and messaging capability.

Operations: Operational functionality that permits staff to manage day-to-day activities, including bed availability, and incident reporting.

Accounting: Traditional accounting tools and special components to record service activity/expenditures against specific grants. Some systems have donor and fundraising elements.

Thus, HMIS software provides local providers and agencies not only with comprehensive information on the nature of homelessness in their communities, but also with the ability to generate reports on their internal operations and for various funders. Because each participating provider agrees to share certain information with the HMIS central server, it also offers the capacity to generate reports on the operations of the CoC system as a whole.

One of HUD's major goals in this HMIS initiative is to help individual homeless service providers access the very best computer technology to assist them in their day-to-day operations and to help increase the effective coordination of services in the CoC. To this end, HUD has developed several publications to assist local jurisdictions including: Homeless Management Information System Consumer Guide: A Review of Available HMIS Solutions, January 2003; and Homeless Management Information Systems: Implementation Guide, September 2002. These guides can be found at: http://www.hud.gov/offices/cepd/homeless/hmis/guide. HUD is also preparing a
guide on local uses of HMIS data that will be available on HUD's Web site following the publication of this Notice in 2004.

1.4. Overview of Data Standards, Definitions, and Collection Requirements

1.4.1. Universal Data Elements

Data to be collected by all HMIS are those essential to the administration of local homeless assistance programs and to obtaining an accurate picture of the extent, characteristics and the patterns of service use of the local homeless population. These data elements are critical to meeting the Congressional requirement for HMIS. Therefore, all providers participating in a local HMIS will be required to collect the universal data elements from all homeless clients seeking housing or services, including data of birth, race, ethnicity, gender, veteran's status and Social Security Number (SSN). Standards for notification about the purposes of data collection, non-disclosure, and protection of this and other data elements are discussed in Section 4 of this Notice.

In addition to personal identifying information, the universal data elements include information on a client's demographic characteristics and recent residential history in order to enable local providers and communities to analyze patterns of homelessness and service use. Among other important uses, these data will enable CoCs to identify the chronically homeless. Section 2 of this Notice provides more detail on the standards for the universal data elements.

1.4.2. Program-Specific Data Elements

Program-specific data elements are needed to assess the operations and outcomes of programs that provide services to homeless clients. HUD, other Federal agencies, State and local governments, and private funders of homeless services often require certain information to assess services, to determine eligibility for housing or services provided by particular programs, and to monitor service provision and outcomes for clients. This eligibility-related information is often statutory and/or regulation-based and is contained in provider agreements. Therefore, some providers are required to obtain certain information from homeless persons as a condition for receiving services. (See HUD's McKinney-Vento Act client-eligibility and assessment program requirements above).

Program-specific data elements should be collected from all clients served by programs that are required to report this information to HUD or other organizations. For programs with no such reporting requirement, these standards are recommended to allow data across all local programs to be easily analyzed. For programs that receive funding through HUD's SHP, S+C Program, and Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program, as well as HOPWA-funded homeless programs, most program-specific data elements are required to complete APRs. Exceptions to this requirement may occur in outreach programs to the street homeless or other nonresidential-based services such as soup kitchens. In such cases, an intake is often not taken, or even possible, and no information is required to access the service.

Data elements required to assess operations and outcomes of programs include private or sensitive information on topics such as income, physical disabilities, behavioral health status, and whether the client is currently at risk of domestic violence. As described in Section 4, CoCs will have to establish firm policies and procedures to protect against unauthorized disclosure of personal information. Section 3 of this Notice provides more detail on the standards for program-specific data elements.

1.4.3. Data Collection and Reporting

As will be discussed further in Sections 2 and 3, the data standards establish uniform definitions for the types of information to be collected but not uniform protocols for how the data are to be collected. With some exceptions, the data need not be collected at a standard point in time during intake, assessment, or provision of services, as programs differ in the ways in which these functions are performed. The intent is not to add the administration of a survey questionnaire to other program activities, but rather to ensure that information with standardized meaning is entered into the HMIS.

Providers will be required to report the client-level data specified in this Notice on a regular basis to a central data storage facility in order to make it possible for the CoC to eliminate duplicate records and analyze the data for local planning purposes. The CoC will be responsible for aggregating the data and preparing an unduplicated local count of homeless persons and a description of their characteristics and patterns of service use. The CoC must retain the data for a period of seven years, adhering to the security provisions set forth in Section 4 of this Notice. An HMIS should have the ability to record client data from a limitless number of service transactions for longitudinal data analysis and assessment of client outcomes (often referred to as a "transactional" or "relational" database structure). The maintenance of historical data is discussed in Section 5 of this Notice.

1.4.4. Additional HMIS Data Elements

Particular programs (or the entire local CoC) may wish to collect assessment, service tracking, and outcome information in more detail than required by the uniform HMIS standards. For example, with regard to behavioral health, a program may wish to capture significantly more information about a client's psychiatric history or current status than is specified under the program-specific data elements. Such elective data elements are developed at the discretion of each CoC.

Just as is the case for the universal data elements and program-specific data elements, the collection of additional data within the HMIS is subject to privacy and fair housing laws and practices.

1.5. Other HMIS Provisions

1.5.1. Participation Requirements for Providers Receiving HUD McKinney-Vento Act Funding

Given the benefits of an HMIS for providing accurate estimates of the homeless population and its needs and improving housing and service provision at the local level, all recipients of HUD McKinney-Vento Act program funds are expected to participate in an HMIS. The HUD McKinney-Vento Act programs include ESG, SHP, S+C, and Section 8 Moderate Rehabilitation for SRO. In the FY 2003 funding notices for the SHP, S+C, and Section 8 Moderate Rehabilitation for SRO programs, HUD announced that providing data to an HMIS is a condition of funding for grantees.

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.

1.5.2. Participation Requirements for HOPWA-Funded Homeless Projects

Projects that receive HOPWA funding and target homeless persons are
required to participate in HMIS. Such projects involve efforts to: provide outreach and assess the needs of persons with HIV/AIDS who are homeless; provide housing and related supportive services; and conduct project evaluation activities for this sub-population. HOPWA projects that assist persons who are homeless but do not target this sub-population are not required to participate in HMIS. However, such projects are encouraged to consider the benefits of an HMIS in coordinating assistance for clients and in reporting to funders. HOPWA projects that target homeless persons are required to integrate efforts within their Continuum of Care, including the use of the HMIS.

As noted in Section 3 (data element 3.5: HIV/AIDS), the HMIS standards will require the collection of information on a client’s HIV/AIDS status. Such information is covered by confidentiality requirements. As in other areas involving sensitive or protected client information, information should be recorded only when a program or project has adequate data confidentiality protections. These protections include agency policies and procedures and staff training to ensure that HIV-related information cannot be learned by anyone without the proper authorization.

1.5.3. Annual Progress Reports

Recipients of funds under the SHP, S+C, Section 8 SRO and HOPWA Programs are required to submit APRs to HUD. The Notice provides guidance for how to use HMIS data in submitting the current version of the APR. Homeless shelter and service providers receiving funds under the Emergency Shelter Grant (ESG) program are required to participate in an HMIS if the provider is located in a jurisdiction covered by a CoC with an HMIS. Entitlement communities and states are not required to set up an HMIS for homeless providers receiving ESG funds in jurisdictions not covered by a CoC HMIS.

HUD intends at some point to use an APR driven by HMIS data to measure the performance of both McKinney-Vento Act program grantees and CoCs more generally. Prior to implementation of performance-based measures, performance indicators would be developed through a process of consultation with homeless service providers. 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.

CoCs and software developers would be given sufficient time to adopt enhancements to their systems to accommodate new outcome indicators.

1.5.4. Sharing HMIS Data Among Providers Within a CoC

While local providers will be required to report client-level data to a CoC’s central data storage facility on a regular basis, sharing of HMIS data among providers within the CoC is not required by HUD and is at the discretion of each CoC and its providers. In communities where data are shared, providers may choose to share all of the information that is collected about clients or limit that information to a small number of data elements. Where there is limited data sharing, providers should allow access to at least the clients’ names, SSNs, and birthdates in order to prevent the creation of duplicate client records within the CoC. HUD encourages data sharing among providers within a Continuum of Care as sharing of HMIS information allows 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.

1.5.5. Access To HMIS Data Outside the Local Continuum of Care

The HMIS initiative is not a federal effort to track homeless people and their identifying information beyond the local level. HUD has no plans to develop a national client-level database with personal identifiers of homeless service users, having concluded that such an endeavor would create serious impediments to provider participation in local HMIS.

To produce the AHAR, HUD will request aggregated data produced by local HMIS analysts responsible for the 80 jurisdictions in the AHAR sample as well as self-selected non-sample jurisdictions that have a high proportion of homeless assistance providers contributing data to their local HMIS. The aggregated data will represent an unduplicated count of client records at the CoC level. There will be no use of protected personal identifiers to de-duplicate records across CoCs.

Any research on the nature and patterns of homelessness that uses client-level HMIS data will take place only on the basis of specific agreements between researchers and the entity that administers the HMIS. These agreements must reflect adequate standards for the protection of confidentiality of data and must comply with the disclosure provisions in Section 4 of this final Notice. For example, such agreements will be necessary if any of the jurisdictions included in the AHAR sample choose to report client-level data to the organizations conducting the AHAR analysis for HUD rather than reporting aggregated data. Under no circumstances will any identifiers be shared with the Federal Government under these special arrangements. For more information on the AHAR research project, see HUD’s Web site at http://www.hud.gov/offices/cpd/housing/ hmis/standards/hmisfaq.pdf.

1.5.6. Special Provision for Domestic Violence Shelters

Domestic violence shelters and other programs that assist victims of domestic violence play an important role in many CoCs and have received significant funding through local Continuums. Victims of domestic violence are also served in many general purpose programs funded by HUD. HUD is aware of, and is sensitive to, the data confidentiality concerns that many domestic violence programs have with respect to their participation in a local HMIS.

At the same time, HUD recognizes that HMIS can provide valuable data concerning domestic violence victims’ needs, and localities have been able to greatly improve their service delivery to this vulnerable population. In communities across the country, domestic violence programs are already providing data to local HMIS. The key to participation hinges on the availability of sophisticated HMIS software that addresses data security issues and the development of protocols within programs for data security, confidentiality, and sharing that satisfy the concerns of domestic violence programs.

After careful review, HUD has determined that it will require domestic violence programs that receive HUD McKinney-Vento funds to participate in local HMIS. HUD expects domestic violence programs that receive HUD McKinney-Vento funds to implement the universal and, where applicable, program-specific data elements described in this final Notice. Adopting these standards is essential if domestic violence programs are to comply with HUD reporting requirements. CoC representatives are instructed to meet with domestic violence program staff in their communities with the goal of developing procedures and protocols that will provide the necessary safeguards for victims of domestic
violence and address the concerns of domestic violence programs. All HMIS data is subject to the privacy and security standards set forth in Section 4 of this Notice.

HUD is prepared to provide extensive technical assistance to communities to develop the best possible solutions for domestic violence victims and providers. Given that it may take additional time to reach agreement in communities where domestic violence programs do not presently provide data, HUD will permit CoCs to stage the entry of domestic violence programs last, including after the October 2004 goal for HMIS implementation. The later staging of entry into the HMIS by domestic violence programs will be taken into account in HUD’s assessment of CoC progress in HMIS implementation in the national CoC competitive ranking process.

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. It is expected that all CoCs will make progress toward meeting the Congressional direction for implementation of HMIS by October 2004. As shown in the chart, a CoC’s first priority is to bring on board emergency shelters, transitional housing programs, and outreach programs. Providers of emergency shelter, transitional housing, and homeless outreach services should be included in the HMIS as early as possible, regardless of whether they receive funding through the McKinney-Vento Act or from other sources.

As a second priority, HUD encourages CoCs to actively recruit providers of permanent supportive housing funded by HUD McKinney-Vento Act programs and other HUD programs. As a third priority, CoCs should recruit homelessness prevention programs, Supportive Services Only programs funded through HUD’s Supportive Housing Program, and non-federally funded permanent housing programs.

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 the proposed HMIS data elements for this Notice. HUD continues to work with those agencies to maximize standardization of McKinney-Vento Act reporting requirements and to broaden adoption of HMIS-based data.

Efforts to recruit providers into the HMIS will require local HMIS designers to make trade-offs between the desirability of including as many homeless service providers as early as possible and the feasibility of obtaining high quality data. At the same time, given the benefits of HMIS to clients, service providers, and the larger CoC system, a high degree of coverage is both desirable and advantageous.
## Priority Participation\(^1\) in HMIS

By Program Type

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</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Federal Programs</th>
<th>Residential</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Food and Shelter (FEMA)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>NA</td>
<td>1</td>
<td>1</td>
<td>NA</td>
<td>3</td>
</tr>
<tr>
<td>Runaway and Homeless Youth (HHS)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Projects for Assistance in Transition from Homelessness (PATH)(HHS)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Traditional Living for Homeless Youth (HHS)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>NA</td>
<td>NA</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Family Violence Prevention and Services (HHS)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Health Center Grants for Homeless Persons (Health Care for the Homeless)(HHS)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Violence Against Women Grants (DOJ)</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>VA Homeless Providers Grants and Per Diem</td>
<td>Outreach To Street</td>
<td>Emergency</td>
<td>Transitional</td>
<td>Permanent Supportive Housing</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

Non-Federally Funded Service Providers

For example, programs operated by faith-based and community based organizations that take no federal funds

<table>
<thead>
<tr>
<th></th>
<th>Outreach To Street</th>
<th>Emergency</th>
<th>Transitional</th>
<th>Permanent Supportive Housing</th>
<th>Homeless Prevention</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>3</td>
</tr>
</tbody>
</table>

---

\(^1\) The Department expects that communities will set priorities for HMIS participation by beginning with activities designated as "1", then "2" and finally "3."

\(^2\) Supportive Service Only programs funded under SHP are designated as "3" priority for HMIS participation.
2. Data Standards For Universal Data Elements

The universal data elements should be collected by all agencies serving homeless persons. HUD carefully weighed the reporting burden of the universal data elements against the importance of the information for producing meaningful local and Federal reports. Of special concern to HUD was the reporting burden for programs that register large numbers of applicants on a daily basis, with little time to collect information from each applicant. As a result, the number of universal data elements was kept to a minimum, and the ease of providing the information requested and whether or not many homeless service providers were already collecting such information was considered for each element.

The universal data standards will make possible unduplicated estimates of the number of homeless people accessing services from homeless providers, basic demographic characteristics of people who are homeless, and their patterns of service use. The universal data standards will also allow measurement of the number and share of chronically homeless people who use homeless services. The standards will enable generation of information on shelter stays and homelessness episodes over time. The universal data elements are:

2.1: Name
2.2: Social Security Number
2.3: Date of Birth
2.4: Ethnicity and Race
2.5: Gender
2.6: Veteran Status
2.7: Disabling Condition
2.8: Residency Prior to Program Entry
2.9: Zip Code of Last Permanent Address

2.10: Program Entry Date
2.11: Program Exit Date
2.12: Unique Person Identification Number
2.13: Program Identification Number
2.14: Household Identification Number

Data elements 2.1 through 2.9 require that staff from a homeless assistance agency enter information provided by a client into the HMIS database. Data elements 2.1 to 2.5 only need to be collected the first time a client uses a program offered by a provider or, within a CoC that shares local HMIS data, uses a program offered by any provider in that community. If some of this information is not collected the first time a client accesses services or is inaccurate, it may be added or corrected on subsequent visits. Data elements 2.6 to 2.9 may need to be collected in subsequent visits as this information can change over time. However, the new information that changes over time should be captured without overwriting the information collected previously.

The next two elements, 2.10 and 2.11, are entered by staff (or computer-generated) every time a client enters or leaves a program. Elements 2.12 to 2.14 are automatically generated by the data collection software, although staff inquiries are essential for the proper generation of these elements. Data elements 2.13 and 2.14 need to be generated for each program entry.

Exhibit 1 at the end of this section summarizes the above information for each universal data element.

The following are questions for obtaining the required information, although recommended questions are provided in Exhibit 2 at the end of this section. Providers have the flexibility to tailor data collection questions and procedures to their circumstances as long as the information is accurately and consistently collected given the response categories and definitions provided. As discussed in Section 4, HUD requires that clients be notified of the purpose for which the information is being collected and the ways in which the client may benefit from providing the information.

The response categories are required and the HMIS application must include the exact response categories that are presented in this section. For each data element, a definition indicating the type of information to be collected and the response categories are shown separately. Exhibit 3, at the end of this section, summarizes the required response categories for all the universal data elements. Section 5 of this Notice, Technical Standards, discusses approaches for handling missing response categories throughout the HMIS application.

All universal data elements must be obtained from each adult and unaccompanied youth who applies for a homeless assistance service. Most universal data elements are also required of children under age 18 in a household. Where a group of persons apply for services together (as a household or family), information about any children under the age of 18 in the household can be provided by the household head who is applying for services. The children do not need to be present at the time the household head applies for services. However, information should not be recorded for children under age 18 if it is indicated that these children will not be entering the program on the same day as the household head. Information for these children should be recorded when the children join the program. Information on any other adults (18 years of age or older) who are applying for services as part of the household will be obtained directly from that adult. Generally, one adult should not provide information for another adult.

All identifying information, including data elements 2.1 (Name), 2.2 (SSN), 2.3 (Date of Birth), 2.9 (Zip Code of Last Permanent Address), 2.10 Program Entry Date, 2.11 (Program Exit Date), 2.12 (Unique Person Identification Number), and 2.13 (Program Identification Number) need to have special protections to ensure the data are unusable by casual viewers. HMIS user access to this information will be highly restricted in accordance with Section 4 of this Notice.

2.1. Name

_Rationale:_ The first, middle, last names, and suffix should be collected to support the unique identification of each person served.

_Data Source:_ Client interview or self-administered form.

_When Data Are Collected:_ Upon initial program entry or as soon as possible thereafter.

_Subjects:_ All clients.

_Definition and Instructions:_ Four fields should be created in the HMIS database to capture the client’s full first, middle, and last names and any suffixes (e.g., John David Doe, Jr.). Try to obtain legal names only and avoid aliases or nicknames. Section 5 of this Notice discusses how to treat missing information for open-ended questions.

_Required Response Categories:_

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1. Name</td>
<td></td>
</tr>
<tr>
<td>Current name</td>
<td>First name</td>
</tr>
<tr>
<td>Other Name Used to</td>
<td>Middle name</td>
</tr>
<tr>
<td>Receive Services</td>
<td>Last name</td>
</tr>
<tr>
<td>previously</td>
<td>Suffix.</td>
</tr>
<tr>
<td></td>
<td>First name</td>
</tr>
<tr>
<td></td>
<td>Middle name</td>
</tr>
<tr>
<td></td>
<td>Last name</td>
</tr>
<tr>
<td></td>
<td>Suffix.</td>
</tr>
</tbody>
</table>
### Universal Data Element—Continued

<table>
<thead>
<tr>
<th>2.1. Name</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>John .................</td>
</tr>
</tbody>
</table>

**Special Issues:** This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Part 4 of this Notice.

#### 2.2. Social Security Number

**Rationale:** The collection of a client's Social Security Number (SSN) and other personal identifying information is required for two important reasons. First, unique identifiers are key to producing an accurate, unduplicated local count of homeless persons accessing services covered by HMIS. This is particularly critical in jurisdictions where homeless assistance providers do not share data at the local level and are, therefore, unable to use a Personal Identification Number to de-duplicate (at intake) across all the programs participating in the CoC's HMIS (see data element 2.12 for more information). Where data are not shared, CoCs must rely on a set of unique identifiers to produce an unduplicated count once the data are sent to the CoC or central server. Name and date of birth are useful unique identifiers, but these identifiers by themselves do not facilitate as accurate an unduplicated count of homeless persons as using SSN since names change and people share the same date of birth. Where data are shared across programs, SSN greatly improves the process of identifying clients who have been previously served and allows programs to de-duplicate upon program entry.

**Second,** an important Congressional goal is to increase the use of mainstream programs by homeless persons. To achieve this goal, homeless service providers need the SSN along with the other personal identifiers in order to access mainstream services for their clients.

**Data Source:** Interview or self-administered form.

**When Data Are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All clients.

**Definitions and Instructions:** In one field, record the nine-digit Social Security Number. In another field, record the appropriate SSN data quality code.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>2.2 Social security number</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Security number</td>
<td></td>
</tr>
<tr>
<td>SSN data quality code</td>
<td></td>
</tr>
<tr>
<td>/ / (example: 123 45 6789)</td>
<td>1 = Full SSN reported.</td>
</tr>
<tr>
<td></td>
<td>2 = Partial SSN reported.</td>
</tr>
<tr>
<td></td>
<td>8 = Don't know or don't have SSN.</td>
</tr>
<tr>
<td></td>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

**Special Issues:** Although the HMIS application’s data entry form may include hyphens or back slashes within the SSN to improve readability, one alphanumeric field without hyphens should be created within the HMIS database. Ideally, if only a partial SSN is recorded, the database should fill in the missing numbers with blanks so that the provided numbers are saved in the correct place of the Social Security Number. (For example, if only the last four digits of the SSN, “123456789” are given, it should be stored as “1234 56789” and if only the first three digits are provided, it should be stored as “123”.) This will allow maximum matching ability for partial SSNs.

Under Federal law (5 U.S.C. 552a), a government agency cannot deny shelter or services to clients who refuse to provide their SSN, unless the requirement was in effect before 1975 or SSN is a statutory requirement for receiving services from the program. This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

#### 2.3. Date of Birth

**Rationale:** The date of birth can be used to calculate the age of persons served at time of program entry or at any point in receiving services. It will also support the unique identification of each person served.

**Data Source:** Client interview or self-administered form.

**When Data Are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All clients.

**Definitions and Instructions:** Collect the month, day, and year of birth for every person served. If a client cannot remember the year of birth, ask the person's age and calculate the approximate year of birth. If a client cannot remember the month or day of birth, communities may record an approximate date of “01” for month and “01” for day since this approximation is a best practice among data users. Communities that already have a policy of entering another approximate date may continue this policy. Approximate dates for month and day will allow calculation of a person's age within one year of their actual age.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>2.3 Date of birth</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>/ / (e.g., 09/31/1965).</td>
<td></td>
</tr>
</tbody>
</table>
Special Issues: One date-format field for birth dates should be created in the HMIS database. This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.4. Ethnicity/Race

Rationale: Ethnicity and race are used to count the number of homeless persons who identify themselves as Hispanic or Latino and to count the number of homeless persons who identify themselves within five different racial categories. In the October 30, 1997 issue of the Federal Register (62 FR 58782), the Office of Management and Budget (OMB) published "Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity." All existing Federal recordkeeping and report requirements must be in compliance with these Standards as of January 1, 2003. The data standards in this Notice follow the OMB guidelines and can be used to complete HUD form 27061.

Data Source: Interview or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Definitions and Instructions: In separate data fields, collect both the self-identified Hispanic or Latino ethnicity and the self-identified race of each client served. Allow clients to identify multiple racial categories. Staff observations should not be used to collect information on ethnicity and race.

2.4.1. Ethnicity

The definition of Hispanic or Latino ethnicity is a person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture of origin, regardless of race.

2.4.2. Race

Definitions of each of the race categories are as follows:

1.—American Indian or Alaska Native is a person having origins in any of the original peoples of North and South America, including Central America, and who maintains tribal affiliation or community attachment.

2.—Asian is a person having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.

3.—Black or African American is a person having origins in any of the black racial groups of Africa. Terms such as "Haitian" or "Negro" can be used in addition to "Black or African American."

4.—Native Hawaiian or Other Pacific Islander is a person having origins in any of the original peoples of Hawaii, Guam, Samoas or other Pacific Islands.

5.—White is a person having origins in any of the original peoples of Europe, the Middle East or North Africa.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>2.4—Ethnicity and race</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ethnictiy</td>
<td>0 = Non-Hispanic/Latino.</td>
</tr>
<tr>
<td></td>
<td>1 = Hispanic/Latino.</td>
</tr>
<tr>
<td>Race</td>
<td>1 = American Indian or</td>
</tr>
<tr>
<td></td>
<td>Alaska Native.</td>
</tr>
<tr>
<td></td>
<td>2 = Asian.</td>
</tr>
<tr>
<td></td>
<td>3 = Black or African-Amer-</td>
</tr>
<tr>
<td></td>
<td>ican.</td>
</tr>
<tr>
<td></td>
<td>4 = Native Hawaiian or</td>
</tr>
<tr>
<td></td>
<td>Other Pacific Islander</td>
</tr>
<tr>
<td></td>
<td>5 = White</td>
</tr>
</tbody>
</table>

2.5. Gender

Rationale: To create separate counts of homeless men and homeless women served.

Data Source: Interview, observation, or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Definitions and Instructions: Record the gender of each client served.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>2.5 Gender</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0 = Female.</td>
</tr>
<tr>
<td></td>
<td>1 = Male.</td>
</tr>
</tbody>
</table>

Special Issues: Programs may add "transgender male to female" and "transgender female to male" categories as needed. However, for reporting purposes these categories are to be aggregated to the "male" or "female" categories based on the client's self-perceived sexual identity.

2.6. Veteran Status

Rationale: To determine the number of homeless veterans.

Data Source: Interview or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>2.6 Veteran status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0 = No.</td>
</tr>
<tr>
<td></td>
<td>1 = Yes.</td>
</tr>
<tr>
<td></td>
<td>8 = Don't Know.</td>
</tr>
<tr>
<td></td>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

2.7. Disabling Condition

Rationale: Disability condition is needed to help identify clients meeting HUD's definition of chronically homeless and, depending on the source of program funds, may be required to establish client eligibility to be served by the program.

Data Source: Client interview, self-administered form, observation, or assessment. Where disability is a statutory or regulatory eligibility criteria, the data source is the evidence required by the funding source.

When Data Are Collected: At any time after the client has been admitted into the program.

Subjects: All adults served.

Definitions and Instructions: For this data element, a disabling condition means: (1) A disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes an individual's ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions; (3) a developmental disability as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; (4) the disease of acquired immunoodeficiency syndrome or any conditions arising from the etiological agency for acquired immunoodeficiency syndrome; or (5) a diagnosable substance abuse disorder.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>2.7 Disabling condition</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0 = No.</td>
</tr>
<tr>
<td></td>
<td>1 = Yes.</td>
</tr>
<tr>
<td></td>
<td>8 = Don't Know.</td>
</tr>
<tr>
<td></td>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>
**Special Issues:** Homeless service providers must separate the client intake process for program admission from the collection of disability information in order to comply with Fair Housing laws and practices, unless this information is required to determine program eligibility.

For the purposes of defining an adult that meets HUD's definition of chronically homeless, programs should use the Disabling Condition data element along with: Date of Birth (to determine that the person is 18 years of age or older); Household Identification Number (to identify unaccompanied individuals); and Residence Prior to Program Entry or prior information on Program Entry and Program Exit dates (to determine the number of episodes of homelessness and length of time a person is homeless).

### 2.8 Residence Prior to Program Entry

**Rationale:** To identify the type of residence and length of stay at that residence just prior to program admission.

**Data Source:** Interview or self-administered form.

**When Data Are Collected:** At any time after the client has been admitted into the program.

**Subjects:** All adults and unaccompanied youth served.

**Definition and Instructions:** In separate fields, determine the type of living arrangement the night before entry into the program and the length of time the client spent in that living arrangement.

**Required Response Categories:**

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>Type of Residence</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher).</td>
<td></td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons (including homeless youth).</td>
<td></td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab).</td>
<td></td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility.</td>
<td></td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center.</td>
<td></td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric).</td>
<td></td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility.</td>
<td></td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent.</td>
<td></td>
</tr>
<tr>
<td>11 = Apartment or house that you own.</td>
<td></td>
</tr>
<tr>
<td>12 = Staying or living in a family member's room, apartment, or house.</td>
<td></td>
</tr>
<tr>
<td>13 = Staying or living in a friend's room, apartment, or house.</td>
<td></td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher.</td>
<td></td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home.</td>
<td></td>
</tr>
<tr>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside).</td>
<td></td>
</tr>
<tr>
<td>17 = Other.</td>
<td></td>
</tr>
<tr>
<td>8 = Don't know.</td>
<td></td>
</tr>
<tr>
<td>9 = Refused.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Length of Stay in Previous Place</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = One week or less.</td>
<td></td>
</tr>
<tr>
<td>2 = More than one week, but less than one month.</td>
<td></td>
</tr>
<tr>
<td>3 = One to three months.</td>
<td></td>
</tr>
<tr>
<td>4 = More than three months, but less than one year.</td>
<td></td>
</tr>
<tr>
<td>5 = One year or longer.</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** For APR reporting purposes, programs should use the following coding approach to conform with the response categories in the current APR:

### CROSS-WALK OF HMIS AND APR RESPONSE CATEGORIES FOR RESIDENCE PRIOR TO PROGRAM ENTRY

<table>
<thead>
<tr>
<th>Response categories in the final notice</th>
<th>Corresponding response categories in the current APR</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Emergency shelter</td>
<td>b = Emergency Shelter.</td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons</td>
<td>c = Transitional housing for homeless persons.</td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons</td>
<td>k = Other.</td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility</td>
<td>d = Psychiatric facility.</td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center</td>
<td>e = Substance abuse treatment facility.</td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric)</td>
<td>f = Hospital.</td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility</td>
<td>g = Jail/prison.</td>
</tr>
<tr>
<td>8 = Don't know</td>
<td>k = Other.</td>
</tr>
<tr>
<td>9 = Refused</td>
<td>k = Other.</td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent</td>
<td>i = Rental housing.</td>
</tr>
<tr>
<td>11 = Apartment or house that you own</td>
<td>k = Other.</td>
</tr>
<tr>
<td>12 = Staying or living in a family member's room, apartment, or house</td>
<td>i = Living with relatives/friends.</td>
</tr>
<tr>
<td>13 = Staying or living in a friend's room, apartment, or house</td>
<td>k = Other.</td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher</td>
<td>k = Other.</td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home</td>
<td>a = Non-housing.</td>
</tr>
<tr>
<td>16 = Place not meant for habitation</td>
<td>k = Other.</td>
</tr>
</tbody>
</table>
In addition, for response categories marked with an asterisk (*), if the client came from one of these institutions but was there for less than 30 days and was living in an emergency shelter or in a place not meant for habitation prior to entry, the client should be counted for APR reporting purposes in either the “emergency shelter” or “place not meant for habitation” categories, as appropriate.

This standard does not preclude the collection of residential history information beyond the residence experienced the night prior to program admission.

2.9 Zip Code of Last Permanent Address

**Rationale:** To identify the former geographic location of persons experiencing homelessness.

**Data Source:** Interview or self-administered form.

**When Data Are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All adults and unaccompanied youth.

**Definition and Instructions:** In one field, record the five-digit zip code of the apartment, room, or house where the client last lived for 90 days or more. In another field, record the appropriate Zip data quality code.

**Required Response Categories:**

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>UNIVERAL DATA ELEMENT</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.9 Zip code of last permanent residence</td>
<td></td>
</tr>
<tr>
<td>Zip Code ...................................</td>
<td></td>
</tr>
<tr>
<td>(e.g., 12345) 1 = Full Zip Code Recorded.</td>
<td></td>
</tr>
<tr>
<td>2 = Don't Know. 9 = Refused.</td>
<td></td>
</tr>
<tr>
<td>Zip Data Quality Code</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.10 Program Entry Date

**Rationale:** To determine the length of stay in a homeless residential program or the amount of time spent participating in a services-only program.

**Data Source:** Recorded by the staff responsible for registering program entrants.

**When Data Are Collected:** Upon any program entry (whether or not it is an initial program entry).

**Subjects:** All clients.

**Definition and Instructions:** Record the month, day, and year of first day of program entry. For a shelter visit, this date would represent the first day of residence in a shelter program following residence outside of the shelter or in another program. For services, this date may represent the day of program enrollment, the day a service was provided, or the first date of a period of continuous participation in a service (e.g., daily, weekly or monthly).

There should be a new program entry date (and corresponding program exit date) for each period/episode of service. Therefore, any return to a program after a break in treatment, completion of the program, or termination of the program by the user or provider must be recorded as a new program entry date. A definition of what constitutes a break in the treatment depends on the program and needs to be defined by program staff. For example, programs that expect the same client on a daily (or almost daily) basis may define a break in treatment as one missed day that was not arranged in advance or three consecutive missed days for any reason. Treatment programs that are scheduled less frequently than a daily basis may define a break in treatment as one or more missed weekly sessions.

**Required Response Categories:**

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.11 Program Exit Date</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month (Day) (Year)</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.12 Unique Person Identification Number

**Rationale:** Every client receiving homeless assistance services within a CoC is assigned a Personal Identification Number (PIN), which is a permanent and unique number generated by the HMIS application. The PIN is used to obtain an unduplicated count of persons served within a CoC. The PIN is the only identifier that is guaranteed to be present and unique for each client served. A client may not have or may not know their SSN, while other identifying information such as name may be the same as another client’s.

**Data Source:** Where data are shared across programs in a CoC, staff will determine at intake whether a client has been assigned a PIN previously by any of the participating programs. To make this determination, the staff enters personal identifying information (Name,
SSN, Date of Birth, and Gender) into the HMIS application. The application then searches a CoC's centralized database for matching records. If a match is found and a PIN is retrieved, the same PIN will be assigned to the client. If no matches are found, a new randomly generated PIN is assigned to the client.

Where data are not shared across programs, staff will similarly determine at intake whether a client has been assigned a PIN previously by their agency or program. If the client is found within their program records, the same PIN will be assigned to the client. If the client has not been served by their program previously, a PIN is randomly generated and assigned to the client. The PIN will allow programs to produce an unduplicated count of clients served by their program. Programs will provide client-level information on a regular basis to the CoC system administrators who are responsible for producing a CoC-wide unduplicated count.

**When Data Are Collected:** Upon program entry.

**Subjects:** All clients.

**Definition and Instructions:** Assign a unique ID number to each client served. The PIN is a number automatically generated by the HMIS application (see Section 5 of this Notice). The PIN will not be based on any client-specific information, but instead should be a randomly, computer-generated number.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Identification Number</td>
<td>A PIN must be created, but there is no required format as long as there is a single unique PIN for every client served in the CoC and it contains no personally identifying information.</td>
</tr>
</tbody>
</table>

**Special Issues:** This data standard should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.13 Program Identification Information

**Rationale:** Program identification information will indicate the geographic location of a program, its facility and CoC affiliation, and whether the program is a street outreach, emergency shelter, transitional housing, permanent supportive housing, homeless prevention, services-only or other type of program.

**Data Source:** Selected by staff from a list of programs available within a particular agency or the CoC. Upon selection of a program from the list, the HMIS application will assign the program identification information to every program event for each client.

**When Data Are Collected:** Upon any program entry (whether or not it is an initial program entry).

**Subjects:** All clients.

**Definition and Instructions:** The program identification information consists of four components that identifies the geographic location of a program Federal Information Processing Standards (FIPS code), its facility and CoC affiliation, and whether it is a street outreach, emergency shelter, transitional housing, permanent supportive housing, homeless prevention, services-only or other type of program. For each client, staff will only need to select the name of the program servicing the client. Staff will not need to view or have access to the actual program identification number. For some providers with only one program for all clients, the HMIS application can be specified to automatically generate the Program Identification Information. For more information on the components of this data element, see Section 5 of this Notice.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Type Code</td>
<td>1 = Emergency shelter (e.g., facility or vouchers)</td>
</tr>
<tr>
<td>2 = Transitional housing</td>
<td></td>
</tr>
<tr>
<td>3 = Permanent supportive housing</td>
<td></td>
</tr>
<tr>
<td>4 = Street outreach</td>
<td></td>
</tr>
<tr>
<td>5 = Homeless prevention (e.g., security deposit or one month's rent)</td>
<td></td>
</tr>
<tr>
<td>6 = Services only type of program</td>
<td></td>
</tr>
<tr>
<td>7 = Other</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** The FIPS code, facility code, CoC code, and program type code should be stored as separate fields in the database. This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.14 Household Identification Number

**Rationale:** To count the number of households served.

**Data Source:** Interview or staff observation that a client is participating in a program with other members of a household.

**When Data Are Collected:** Upon any program entry (whether or not it is an initial program entry) or as soon as possible thereafter.

**Subjects:** All clients.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household identification number</td>
<td>A Household ID number must be created, but there is no required format as long as the number allows identification of clients that receive services as a household.</td>
</tr>
</tbody>
</table>

**Special Issues:** A household is a group of persons who together apply for homeless assistance services. If it is not evident to program staff whether or not the others are applying for assistance with the client, then program staff should ask if anyone else is applying for assistance with the client.

Persons can join a household with members who have already begun a program or leave a program although other members of the household remain in the program. A common household identification number should be assigned to each member of the same
household. Individuals in a household (adults and/or children) who are not present when the household initially applies for assistance and later join the household should be assigned the same household identification number that links them to the rest of the persons in the household. For example, a child may be in school when the adult applies for assistance, but will be part of the household receiving assistance from the program right from the start. Or, a child may be in foster care at the time service is initiated, but may rejoin the household to receive services several weeks later. See Section 5 of this Notice for more information on this data element.

### EXHIBIT 1: SUMMARY OF UNIVERSAL DATA ELEMENTS

<table>
<thead>
<tr>
<th>Data standards</th>
<th>Subjects</th>
<th>Protected personal information</th>
<th>Data entry or computer generated</th>
<th>Collect at initial or every service event</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Name</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.2 Social Security Number</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.3 Date of Birth</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.4 Ethnicity and Race</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.5 Gender</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.</td>
</tr>
<tr>
<td>2.6 Veteran Status</td>
<td>Adults</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.7 Disabling Condition</td>
<td>Adults</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.8 Residence Prior to Program Entry</td>
<td>Adults and Unaccompanied Youth.</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.9 Zip Code of Last Permanent Address</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.10 Program Entry Date</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.11 Program Exit Date</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.</td>
</tr>
<tr>
<td>2.12 Unique Personal Identification Number</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.</td>
</tr>
<tr>
<td>2.13 Program Identification Number</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.1</td>
</tr>
<tr>
<td>2.14 Household Identifier Number</td>
<td>All Clients</td>
<td>Protected</td>
<td>Data Entry</td>
<td>Initial Only.</td>
</tr>
</tbody>
</table>

1 Note that one or more of these personal identifiers may need to be asked on subsequent visits to find and retrieve the client’s record. However, this information only needs to be recorded on the initial visit.

### EXHIBIT 2: RECOMMENDED QUESTIONS FOR UNIVERSAL DATA ELEMENTS

#### 2.1 Name

Q: “What is your first, middle, and last name, and suffix?” (legal names only; avoid aliases or nicknames)

#### 2.2 Social Security Number (SSN)

Q: “What is your Social Security Number?”

#### 2.3 Date of Birth

Q: “What is your birth date?”

If complete birth date is not known:

Q: “What is your age?”

#### 2.4 Ethnicity and Race

Q: “Are you Hispanic or Latino?”
Q: “What is your race (you may name more than one race)?”

#### 2.5 Gender

Q: “Are you male or female?”

#### 2.6 Veteran Status

Q: “Have you ever served on active duty in the Armed Forces of the United States?”

#### 2.7 Disabling Condition

Q: “Do you have a physical, mental, emotional or developmental disability, HIV/AIDS, or a diagnosable substance abuse problem that is expected to be of long duration and substantially limits your ability to live on your own?”

#### 2.8 Residence Prior to Program Entrance

Q: “Where did you stay last night?”
Q: “How long did you stay at that place?”

#### 2.9 Zip Code of Last Permanent Residence

Q: “What is the zip code of the apartment, room, or house where you last lived for 90 days or more?”
EXHIBIT 2: RECOMMENDED QUESTIONS FOR UNIVERSAL DATA ELEMENTS—Continued

2.10 Program Entry Date
No question needed.

2.11 Program Exit Date
No question needed.

2.12 Personal Identification Number (PIN)
To facilitate the search for an existing PIN, may want to ask:
Q: “Have you ever been served by this [name of facility or program] before?”

2.13 Program Identification Number
No question needed.

2.14 Household Identification Number
If it is not evident that others are applying for or receiving assistance with the client, then may want to ask:
Q: “Is there someone else who is applying for (or receiving) assistance with you?” If yes,
Q: “What is their first, middle, and last name?” (legal names only; avoid aliases and nicknames)
Q: “Do you have any children under 18 years of age with you?” If yes,
Q: “What is (are) the first, middle, and last name(s) of the child(ren) with you?”

EXHIBIT 3: REQUIRED RESPONSE CATEGORIES FOR UNIVERSAL DATA ELEMENTS

2.1 Name

<table>
<thead>
<tr>
<th>Current Name</th>
<th>First Name</th>
<th>Middle Name</th>
<th>Last Name</th>
<th>Suffix</th>
<th>Suffix</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Name Used to Receive Services Previously</td>
<td>John</td>
<td>David</td>
<td>Doe</td>
<td>Jr.</td>
<td></td>
</tr>
</tbody>
</table>

Example

2.2 Social security number

<table>
<thead>
<tr>
<th>Social security number</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSN data quality code</td>
<td>example: 123 45 6789</td>
</tr>
<tr>
<td>1 = Full SSN Reported</td>
<td></td>
</tr>
<tr>
<td>2 = Partial SSN Reported</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know or Don’t Have SSN</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

2.3 Date of birth

<table>
<thead>
<tr>
<th>Date of birth</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>/ / / (e.g., 08/31/1965)</td>
<td></td>
</tr>
</tbody>
</table>

2.4 Ethnicity and race

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = non-Hispanic/Latino</td>
<td></td>
</tr>
<tr>
<td>1 = Hispanic/Latino</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Race</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = American Indian or Alaska Native</td>
<td></td>
</tr>
<tr>
<td>2 = Asian</td>
<td></td>
</tr>
<tr>
<td>3 = Black or African-American</td>
<td></td>
</tr>
<tr>
<td>4 = Native Hawaiian or Other Pacific Islander</td>
<td></td>
</tr>
<tr>
<td>5 = White</td>
<td></td>
</tr>
</tbody>
</table>

2.5 Gender

<table>
<thead>
<tr>
<th>Gender</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = Female</td>
<td></td>
</tr>
<tr>
<td>1 = Male</td>
<td></td>
</tr>
</tbody>
</table>

2.6 Veteran status

<table>
<thead>
<tr>
<th>Veteran status</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

2.7 Disabling condition

<table>
<thead>
<tr>
<th>Disabling condition</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

2.8 Residence prior to program entry

<table>
<thead>
<tr>
<th>Type of residence</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher)</td>
<td></td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
</tr>
<tr>
<td>------</td>
<td>-------------</td>
</tr>
<tr>
<td>1</td>
<td>Refused</td>
</tr>
<tr>
<td>2</td>
<td>One week or less</td>
</tr>
<tr>
<td>3</td>
<td>One to three months</td>
</tr>
<tr>
<td>4</td>
<td>More than three months, but less than one year</td>
</tr>
<tr>
<td>5</td>
<td>One year or longer</td>
</tr>
<tr>
<td>6</td>
<td>More than one week, but less than one month</td>
</tr>
<tr>
<td>7</td>
<td>Staying or living in a friend's room, apartment, or house</td>
</tr>
<tr>
<td>8</td>
<td>Staying or living in a family member's room, apartment, or house</td>
</tr>
<tr>
<td>9</td>
<td>Room, apartment, or house that you rent</td>
</tr>
<tr>
<td>10</td>
<td>Apartment or house that you own</td>
</tr>
<tr>
<td>11</td>
<td>Jail, prison or juvenile detention facility</td>
</tr>
<tr>
<td>12</td>
<td>Substance abuse treatment facility or detox center</td>
</tr>
<tr>
<td>13</td>
<td>Detox center</td>
</tr>
<tr>
<td>14</td>
<td>Hospital or mental health facility</td>
</tr>
<tr>
<td>15</td>
<td>Foster care home or foster care group home</td>
</tr>
<tr>
<td>16</td>
<td>Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)</td>
</tr>
<tr>
<td>17</td>
<td>Other</td>
</tr>
<tr>
<td>8</td>
<td>Don't Know</td>
</tr>
</tbody>
</table>

**Length of stay in previous place.**

2.9 Zip code of last permanent residence.

<table>
<thead>
<tr>
<th>Zip code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>12345</td>
<td>(e.g., Full Zip Code Recorded)</td>
</tr>
</tbody>
</table>

**Zip data quality code.**

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Full Zip Code Recorded</td>
</tr>
<tr>
<td>2</td>
<td>Don't Know</td>
</tr>
<tr>
<td>3</td>
<td>Refused</td>
</tr>
</tbody>
</table>

**Program entry date.**

2.10 **Program exit date.**

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/30/2004</td>
<td>(Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

**Program exit date.**

2.11 **Program identification number.**

<table>
<thead>
<tr>
<th>Identification number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A PIN must be created, but there is no required format as long as there is a single unique PIN for every client served in the CoC and it contains no personally identifying information.</td>
</tr>
</tbody>
</table>

**Program identification number.**

2.12 **Program identification information.**

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>10-digit FIPS code identifying geographic location of provider (see Part 5 of Notice for instructions on how to obtain FIPS code).</td>
</tr>
<tr>
<td>2</td>
<td>Identification code for facility where services provided (Locally Determined)</td>
</tr>
<tr>
<td>3</td>
<td>Emergency shelter (e.g., facility or vouchers)</td>
</tr>
<tr>
<td>4</td>
<td>Transitional housing</td>
</tr>
<tr>
<td>5</td>
<td>Permanent supportive housing</td>
</tr>
<tr>
<td>6</td>
<td>Street outreach</td>
</tr>
<tr>
<td>7</td>
<td>Homeless prevention (e.g., security deposit or one month's rent)</td>
</tr>
<tr>
<td>8</td>
<td>Services only type of program</td>
</tr>
<tr>
<td>9</td>
<td>Other</td>
</tr>
</tbody>
</table>

**Program type code.**

2.13 **Household identification number.**

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>A Household ID number must be created, but there is no required format as long as the number allows identification of clients who receive services as a household.</td>
</tr>
</tbody>
</table>

**Household identification number.**

2.14

3. Program-Specific Data Elements

Program-specific data elements must be collected from all clients served by programs that are required to report this information to HUD and other organizations. For programs with no such reporting requirements, these standards are optional but recommended since they allow local CoGs to obtain consistent information across a range of providers that can be used to plan service delivery, monitor the provision of services, and identify client outcomes. These data elements, however, do not constitute a client assessment tool, and providers will need to develop their own data collection protocols in order to properly assess a client's need for services. For programs that receive funding through HUD's Supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program,
and the homeless programs funded through Housing Opportunities for Persons with AIDS (HOPWA), most program-specific data elements are required to complete Annual Progress Reports (APRs).

The program-specific data elements that are required for HUD’s current APR reporting include:
1. Income and Sources
2. Non-Cash Benefits
3. Physical Disability
4. Developmental Disability
5. HIV/AIDS
6. Mental Health
7. Substance Abuse
8. Domestic Violence
9. Services Received
10. Destination
11. Reasons for Leaving

In addition to these data elements that are required for APR reporting, additional program-specific data elements are recommended by a team of HMIS practitioners, federal agency representatives, and researchers. These data elements are based on best practices that are currently being implemented at the local level. In addition, HUD is working to bring together federal agencies that fund McKinney-Vento programs in an effort to standardize the data elements and definitions used by these agencies in their reporting requirements. This effort to standardize data definitions and standards across federal agencies will make reporting easier and more consistent for homeless providers who use multiple federal funding sources. Some of these data elements may be added to HUD APRs in the future. They include:
1. Employment
2. Education
3. General Health Status
4. Pregnancy Status
5. Veteran’s Information
6. Children’s Education

A summary of the program-specific data elements is provided at the end of this section (see Exhibit 4).

All of the program-specific data elements require that staff from a homeless assistance agency enter information into the HMIS database. This information may be:
- Provided by the client (in the course of client assessment and, for some data elements, at program exit);
- Taken from case manager interviews or records; and/or
- Observed by program staff.

Information should be collected separately from each adult and unaccompanied youth. In the case of a household or family that is receiving services together, information should be obtained and recorded for each adult and child in the household. However, for current APR reporting purposes, programs should continue to report only on participants defined by HUD as single persons and adults in families, excluding children or caregivers who live with the adults, who receive assistance during the operating year. If the source of information is a client interview, staff are encouraged to use the questions that are provided in Exhibit 5 “Recommended Questions for Program-Specific Data Elements” at the end of this section. HUD requires that clients be notified as to why the information is being collected and the ways in which clients may benefit from providing the information. Programs that collect this information should be prepared to help the person, to the extent practicable, either by directly providing services or providing a referral, and programs should provide adequate data confidentiality protections, including adequate training of staff, to ensure that this information remains confidential. As discussed in Section 4 of this Notice, local CoCs must establish firm policies and procedures to protect against unauthorized disclosure of, or misuse of, personal information.

For each program-specific data element, multiple response categories are provided. For APR-required data elements, the response categories and associated codes are required and the HMIS application must include these responses and codes exactly as they are presented in this section. The response categories and corresponding codes for each data element are summarized at the end of this section (see Exhibit 6). Section 5 of this Notice discusses the technical standards for handling specific types of response categories and codes (e.g., missing values and “other” response categories) throughout the HMIS application.

Finally, many of these data elements represent transactions or information that may change over time. The CoC should decide which program-specific data elements to update in cases where clients already have records in the HMIS and return to the program following a previous service episode.

### 3.1 Income and Sources

**Rationale:** Income and sources of income are important for determining service needs of people at the time of program entry, determining whether they are accessing all income sources for which they are eligible, and describing the characteristics of the homeless population. Capturing the amount of cash income from various sources will help to: assure all income sources are counted in the calculation of total income; enable program staff to take into account the composition of income in determining needs; determine if people are receiving the mainstream program benefits to which they may be entitled; help clients apply for benefits assistance; and allow analysis of changes in the composition of income between entry and exit from the program.

**Data Source:** Client interview, self-administered form, and/or case manager records.

**When Data Are Collected:** In the course of client assessment and at program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** In separate fields, determine (a) whether the client received income from each source listed below in the past 30 days, (b) the amount of income received from each source identified by the client, and (c) the client’s total monthly income (rounded to the nearest U.S. dollar). Allow clients to identify multiple sources of income.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program—Specific Data Element</th>
<th>Source and amount of income</th>
<th>Response category</th>
<th>Amount from source $</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Source of income</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = Earned Income</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 = Unemployment Insurance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 = Supplemental Security Income or SSI</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 = Social Security Disability Income (SSDI)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3.1 Income and source

<table>
<thead>
<tr>
<th>Source and amount of income</th>
<th>Source of income</th>
<th>Amount from source</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 = A veteran’s disability payment</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>6 = Private disability insurance</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>7 = Worker’s compensation</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>8 = Temporary Assistance for Needy Families (TANF) (or use local program name).</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>9 = General Assistance (GA) (or use local program name)</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>10 = Retirement income from Social Security</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>11 = Veteran’s pension</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>12 = Pension from a former job</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>13 = Child support</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>14 = Alimony or other spousal support</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>15 = Other source</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
<tr>
<td>16 = No financial resources</td>
<td>..................</td>
<td>$ _ _ 00</td>
</tr>
</tbody>
</table>

Total monthly income

$ _ _ 00

Special Issues: For APR reporting purposes, the total monthly income should include only the income for participants as defined by HUD and should not include income associated with children or caregivers who live with the adults assisted. The income associated with children or caregivers who live with the adults assisted should be recorded separately as part of their individual client record.

Programs may choose to disaggregate the sources of income into more detailed categories as long as these categories can be aggregated into the above-stated sources of income.

3.2 Non-Cash Benefits

Rationale: Non-cash benefits are important to determine whether people are accessing all mainstream program benefits for which they may be eligible and to ascertain a more complete picture of their situation.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment and at program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

Subjects: All adults and unaccompanied youth served by the program.

Definition and Instructions: For each source listed below, determine if the client received any of the non-cash benefits in the past month (30 days). Allow clients to identify multiple sources of non-cash benefits.

Required Response Categories:

3.2 Source of non-cash benefit

<table>
<thead>
<tr>
<th>Response category</th>
<th>1 = Food stamps or money for food on a benefits card</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 = MEDICAID health insurance program (or use local name)</td>
<td></td>
</tr>
<tr>
<td>3 = MEDICARE health insurance program (or use local name)</td>
<td></td>
</tr>
<tr>
<td>4 = State Children’s Health Insurance Program (or use local name)</td>
<td></td>
</tr>
<tr>
<td>5 = Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)</td>
<td></td>
</tr>
<tr>
<td>6 = Veteran’s Administration (VA) Medical Services</td>
<td></td>
</tr>
<tr>
<td>7 = TANF Child Care services (or use local name)</td>
<td></td>
</tr>
<tr>
<td>8 = TANF transportation services (or use local name)</td>
<td></td>
</tr>
<tr>
<td>9 = Other TANF-funded services (or use local name)</td>
<td></td>
</tr>
<tr>
<td>10 = Section 8, public housing, or other rental assistance</td>
<td></td>
</tr>
<tr>
<td>11 = Other source</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: Programs may choose to disaggregate the non-cash sources of income into more detailed categories as long as these categories can be aggregated into the above-stated non-cash sources of income. Programs may also choose to record additional information about non-cash sources of income, including information related to benefit eligibility (e.g., if a person is not receiving a service, is it because they are not eligible or eligibility has not yet been determined); amount of benefits; and start and stop dates for receipt of benefits.

3.3 Physical Disability

Rationale: To count the number of physically disabled persons served by homeless programs, determine eligibility for disability benefits, and assess their need for services.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

Subjects: All clients served.

Definition and Instructions: Determine if the client has a physical disability, meaning a physical impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impeded an individual’s ability to live independently, and (c) of such a nature
that such ability could be improved by more suitable housing conditions.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.3 Physical disability</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0=No</td>
<td>1=Yes</td>
</tr>
</tbody>
</table>

3.4 Developmental Disability

**Rationale:** To count the number of developmentally disabled persons served by homeless programs, determine eligibility for disability benefits, and assess their need for services.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data Are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** Determine if the client has a developmental disability, meaning a severe, chronic disability that is attributed to a mental or physical impairment (or combination of physical and mental impairments) that occurs before 22 years of age and limits the capacity for independent living and economic self-sufficiency.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.4 Developmental disability</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0=No</td>
<td>1=Yes</td>
</tr>
</tbody>
</table>

3.5 HIV/AIDS

**Rationale:** To identify persons who have been diagnosed with AIDS or have tested positive for HIV and assess their need for services.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

**Subjects:** All adults and unaccompanied youth served.

**Definition and Instructions:** In separate data fields, determine: (a) If the client has a mental health problem; and (b) whether it is expected to be of long-continued and indefinite duration and substantially impairs a client’s ability to live independently. A mental health problem may include serious depression, serious anxiety, hallucinations, violent behavior or thoughts of suicide.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.6 Mental Health</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental health problem</td>
<td>0=No</td>
</tr>
<tr>
<td>Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently</td>
<td>0=No</td>
</tr>
</tbody>
</table>

3.7 Substance Abuse

**Rationale:** To count the number of persons served with substance abuse problems, and to assess the need for treatment.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

**Subjects:** All adults and unaccompanied youth served.

**Definition and Instructions:** In separate data fields, determine: (a) If the client has an alcohol or drug abuse problem, or is dully diagnosed and (b) whether it is expected to be of long-continued and indefinite duration and substantially impairs a client’s ability to live independently.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.7 Substance abuse</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substance abuse problem</td>
<td>1 = Alcohol abuse</td>
</tr>
<tr>
<td>2 = Drug abuse</td>
<td>3 = Dully diagnosed</td>
</tr>
<tr>
<td>Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently</td>
<td>0=No</td>
</tr>
</tbody>
</table>

3.8 Domestic Violence

**Rationale:** Ascertaining whether a person is a victim of domestic violence is necessary to provide the person with the appropriate services to prevent further abuse and to treat the physical and psychological injuries from prior abuse. Also, ascertaining that a person may be experiencing domestic violence may be important for the safety of program staff and other clients. At the aggregate level, knowing the size of the homeless population that has
experienced domestic violence is critical for determining the resources needed to address the problem in this population.

Data Source: Client interview, self-administered form and/or case manager records.

When Data are Collected: In the course of client assessment. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

Subjects: All adults and unaccompanied youth.

Definition and Instructions: In separate fields, determine (a) if the client has ever been a victim of domestic violence and (b), if so, how long ago did the client have the most recent experience.

Required Response Categories:

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.8 Domestic violence</td>
</tr>
<tr>
<td>Response category</td>
</tr>
<tr>
<td>Domestic violence experience.</td>
</tr>
<tr>
<td>(If yes) When experience</td>
</tr>
<tr>
<td>occurred.</td>
</tr>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Yes</td>
</tr>
<tr>
<td>1 = Within the past three</td>
</tr>
<tr>
<td>months ago</td>
</tr>
<tr>
<td>2 = Three to six months ago</td>
</tr>
<tr>
<td>3 = From six to twelve months</td>
</tr>
<tr>
<td>ago</td>
</tr>
<tr>
<td>4 = More than a year ago</td>
</tr>
<tr>
<td>8 = Don't know</td>
</tr>
<tr>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

3.9 Services Received

Rationale: To determine the services provided during a program stay and any resulting outcomes. Some funders may want information on service receipt as a performance measure. Service receipt may also be useful in identifying service gaps in a community.

Data Source: Case manager records.

When Data are Collected: In the course of client assessment and at appropriate points during the program stay. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

Subjects: All clients served.

Definition and Instructions: For each service encounter, two types of information must be determined and recorded in two separate fields. Record "date of service" as the two-digit month, two-digit day and four-digit year. Record "type of service" as one of the service types listed below.

Required Response Categories: Note that the services listed here cover all of the types of services that a homeless person receives. Not all of these services are eligible uses of HUD program funds.

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9 Services received</td>
</tr>
<tr>
<td>Response Category</td>
</tr>
<tr>
<td>Date of service</td>
</tr>
<tr>
<td>(Month) (Day) (Year)</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Service type</td>
</tr>
<tr>
<td>1 = Food</td>
</tr>
<tr>
<td>2 = Housing placement</td>
</tr>
<tr>
<td>3 = Material goods</td>
</tr>
<tr>
<td>4 = Temporary housing and other financial aid.</td>
</tr>
<tr>
<td>5 = Transportation</td>
</tr>
<tr>
<td>6 = Consumer assistance and protection.</td>
</tr>
<tr>
<td>7 = Criminal justice/legal services</td>
</tr>
<tr>
<td>8 = Education</td>
</tr>
<tr>
<td>9 = Health care</td>
</tr>
<tr>
<td>10 = HIV/AIDS-related services</td>
</tr>
<tr>
<td>11 = Mental health care/counseling</td>
</tr>
<tr>
<td>12 = Substance abuse services</td>
</tr>
<tr>
<td>13 = Employment</td>
</tr>
<tr>
<td>14 = Case/care management</td>
</tr>
<tr>
<td>15 = Day care</td>
</tr>
<tr>
<td>16 = Personal enrichment</td>
</tr>
<tr>
<td>17 = Outreach</td>
</tr>
<tr>
<td>18 = Other</td>
</tr>
<tr>
<td>(08/31/1965)</td>
</tr>
<tr>
<td>Examples</td>
</tr>
<tr>
<td>Emergency food programs and food pantries.</td>
</tr>
<tr>
<td>Housing search</td>
</tr>
<tr>
<td>Clothing and personal hygiene items.</td>
</tr>
<tr>
<td>Rent payment or deposit assistance</td>
</tr>
<tr>
<td>Bus passes and mass transit tokens</td>
</tr>
<tr>
<td>Money management counseling and acquiring identification/SSN</td>
</tr>
<tr>
<td>Legal counseling and immigration services</td>
</tr>
<tr>
<td>GED instruction, bilingual education, and literacy programs</td>
</tr>
<tr>
<td>Disability screening, health care referrals, and health education (excluding HIV/AIDS-related services, mental health care/counseling, and substance abuse services)</td>
</tr>
<tr>
<td>HIV testing, AIDS treatment, AIDS/HIV prevention and counseling</td>
</tr>
<tr>
<td>Telephone crisis hotlines and psychiatric programs</td>
</tr>
<tr>
<td>Detoxification and alcohol/drug abuse counseling</td>
</tr>
<tr>
<td>Job development and job finding assistance</td>
</tr>
<tr>
<td>Development of plans for the evaluation, treatment and/or care of persons needing assistance in planning or arranging for services</td>
</tr>
<tr>
<td>Child care centers and infant care centers</td>
</tr>
<tr>
<td>Life skills education, social skills training, and stress management</td>
</tr>
<tr>
<td>Street outreach</td>
</tr>
</tbody>
</table>

Special Issues: With few exceptions, the response categories for the type of service provided and the associated examples are based on A Taxonomy of Human Services: A Conceptual Framework with Standardized Terminology and Definitions for the Field, 1994 (published by the Alliance of Information and Referral Systems (AIRS) and INFO LINE of Los Angeles). The "HIV/AIDS-related services" category is not included in the taxonomy under a single heading; instead there are multiple types of HIV/AIDS services found at various service typology levels. The examples associated with this response category are specific types of services identified in the taxonomy. The "housing placement," "outreach" and "other" response categories are not derived from the taxonomy.

The taxonomy is a classification system for human services that has been adopted by information and referral programs, libraries, crisis lines and other programs throughout the United States. It features a five-level hierarchical structure that contains 4,300 terms that are organized into 10 basic service categories. The taxonomy provides a common language for human services, ensuring that people have common terminology for naming services, agreements regarding definitions for what a service involves and a common way of organizing service concepts.

Programs are encouraged to review the Taxonomy of Human Services as a model for a complete list of examples, standardizing terminology and definitions of homeless services.

Programs may choose to disaggregate the types of services into more detailed
service categories as long as they can be aggregated into the above stated service types. For APR reporting purposes, programs should use the following coding approach to conform to the response categories in the current APR:

| CROSS-WALK OF HMIS AND APH RESPONSE CATEGORIES FOR SERVICES RECEIVED |
|-------------------------------------------------|----------------------------------------------------------|
| Response categories in the final notice | Corresponding response categories in the current APR |
| 1 = Food | n = Other |
| 2 = Housing/shelter | i = Housing placement |
| 3 = Material goods | n = Other |
| 4 = Temporary housing and other financial aid | n = Other |
| 5 = Transportation | l = Transportation |
| 6 = Consumer assistance and protection | c = Life skills |
| 7 = Criminal justice/legal services | m = Legal |
| 8 = Education | h = Education |
| 9 = Health care | g = Other health care services |
| 10 = HIV/AIDS-related services | f = HIV/AIDS-related services |
| 11 = Mental health care/counseling | e = Mental health services |
| 12 = Substance abuse services | d = Alcohol or drug abuse services |
| 13 = Employment | j = Employment assistance |
| 14 = Case/care management | b = Case management |
| 15 = Day care | k = Child care |
| 16 = Personal enrichment | c = Life skills (outside of case management) |
| 17 = Outreach | a = Outreach |
| 18 = Other | n = Other |

3.10 Destination

**Rationale:** Destination is an important outcome measure.

**Data Source:** Client interview or self-administered form.

When Data Are Collected: At program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** Determine and record in three separate data fields: (1) Where the client will be staying after they leave the program; (2) if this move is permanent or transitional; and (3) does the move involve a HUD subsidy or other subsidy.

**Required Response Categories:**

| PROGRAM-SPECIFIC DATA ELEMENT |
|-------------------------------|-----------------|
| 3.10 Destination | Response category |

<table>
<thead>
<tr>
<th>Destination</th>
<th>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher)*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2 = Transitional housing for homeless persons (including homeless youth)*</td>
</tr>
<tr>
<td></td>
<td>3 = Permanent housing for formerly homeless persons (such as S+P, S+C, or SRO Mod Rehab)</td>
</tr>
<tr>
<td></td>
<td>4 = Psychiatric hospital or other psychiatric facility</td>
</tr>
<tr>
<td></td>
<td>5 = Substance abuse treatment facility or detox center</td>
</tr>
<tr>
<td></td>
<td>6 = Hospital (non-psychiatric)</td>
</tr>
<tr>
<td></td>
<td>7 = Jail, prison or juvenile detention facility</td>
</tr>
<tr>
<td></td>
<td>10 = Room, apartment, or house that you rent</td>
</tr>
<tr>
<td></td>
<td>11 = Apartment or house that you own</td>
</tr>
<tr>
<td></td>
<td>12 = Staying or living in a family member's room, apartment, or house</td>
</tr>
<tr>
<td></td>
<td>13 = Staying or living in a friend's room, apartment, or house</td>
</tr>
<tr>
<td></td>
<td>14 = Hotel or motel paid for without emergency shelter voucher</td>
</tr>
<tr>
<td></td>
<td>15 = Foster care home or foster care group home</td>
</tr>
<tr>
<td></td>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)</td>
</tr>
<tr>
<td></td>
<td>17 = Other</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tenure</th>
<th>1 = Permanent</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2 = Transitional</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Subsidy Type</th>
<th>0 = None</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 = Public housing</td>
</tr>
<tr>
<td></td>
<td>2 = Section 8</td>
</tr>
<tr>
<td></td>
<td>3 = S+C</td>
</tr>
<tr>
<td></td>
<td>4 = HOME program</td>
</tr>
<tr>
<td></td>
<td>5 = HOPWA program</td>
</tr>
<tr>
<td></td>
<td>6 = Other housing subsidy</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>
**Special Issues:** For response categories marked with an asterisk (*), these destinations are currently not eligible for HOPWA funding. Also, programs may choose to ask additional questions such as whether upon leaving the program the client will be reuniting with other family members who have not been with them during the program stay. For APR reporting purposes, programs should use the following coding approach to conform to the response categories in the current APR:

### CROSS-WALK OF HMIS AND APR RESPONSE CATEGORIES FOR DESTINATION

<table>
<thead>
<tr>
<th>Response categories in the final notice</th>
<th>Corresponding response categories in the APR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Destination = 1</td>
<td>n = Emergency shelter.</td>
</tr>
<tr>
<td>Destination = 2</td>
<td>i = Transitional housing for homeless persons.</td>
</tr>
<tr>
<td>Destination = 3</td>
<td>d = Shelter Plus Care (S+C).</td>
</tr>
<tr>
<td>Destination = 3, Subsidy Type = not equal to 3.</td>
<td>o = Other supportive housing.</td>
</tr>
<tr>
<td>Destination = 4</td>
<td>k = Institution psychiatric hospital.</td>
</tr>
<tr>
<td>Destination = 5</td>
<td>l = Institution inpatient alcohol or other drug treatment facility.</td>
</tr>
<tr>
<td>Destination = 6</td>
<td>q = Other.</td>
</tr>
<tr>
<td>Destination = 7, Subsidy Type = 3</td>
<td>m = Institution jail/prison.</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>b = Public housing.</td>
</tr>
<tr>
<td>Subsidy Type = 1</td>
<td>c = Section 8.</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>d = Shelter Plus Care (S+C).</td>
</tr>
<tr>
<td>Subsidy Type = 2</td>
<td>e = HOME subsidized house or apartment.</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>f = Permanent other subsidized house or apartment.</td>
</tr>
<tr>
<td>Subsidy Type = 3</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>r = Unknown.</td>
</tr>
<tr>
<td>Subsidy Type = 4</td>
<td>a = Rental House or Apt (no subsidy).</td>
</tr>
<tr>
<td>Destination = 8 or 9</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Subsidy Type = 5</td>
<td>g = Homeownership.</td>
</tr>
<tr>
<td>Destination = 10</td>
<td>h = Permanent: moved in with family or friends.</td>
</tr>
<tr>
<td>Subsidy Type = 6, 8 or 9.</td>
<td>j = Transitional: moved in with family or friends.</td>
</tr>
<tr>
<td>Destination = 11</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Destination = 12</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Tenure = 1</td>
<td>p = Other places not meant for human habitation (e.g., street).</td>
</tr>
<tr>
<td>Destination = 12</td>
<td>Tenure = 2, 8, or 9.</td>
</tr>
<tr>
<td>Destination = 13</td>
<td>Destination = 14</td>
</tr>
<tr>
<td>Destination = 15</td>
<td>Destination = 16</td>
</tr>
<tr>
<td>Subsidy Type = 6, 8, 9.</td>
<td>Subsidy Type = 16</td>
</tr>
</tbody>
</table>

### 3.11 Reasons for Leaving

**Rationale:** Reasons for leaving are used, in part, to identify the barriers and issues clients face in completing a program or staying in a residential facility, which may affect their ability to achieve economic self-sufficiency.

**Data Source:** Recorded by program staff.

**When Data Are Collected:** At program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** Identify the reason why the client left the program. If a client left for multiple reasons, record only the primary reason.

**Required Response Categories:**

#### PROGRAM-SPECIFIC DATA ELEMENT

<table>
<thead>
<tr>
<th>3.11 Reason for leaving</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Left for a housing opportunity before completing program</td>
</tr>
<tr>
<td>2</td>
<td>Completed program</td>
</tr>
<tr>
<td>3</td>
<td>Non-payment of rent/occupation charge</td>
</tr>
<tr>
<td>4</td>
<td>Non-compliance with project</td>
</tr>
<tr>
<td>5</td>
<td>Criminal activity/destruction of property/violence</td>
</tr>
<tr>
<td>6</td>
<td>Reached maximum time allowed by project</td>
</tr>
<tr>
<td>7</td>
<td>Needs could not be met by project</td>
</tr>
<tr>
<td>8</td>
<td>Disagreement with rules/persons</td>
</tr>
<tr>
<td>9</td>
<td>Death</td>
</tr>
<tr>
<td>10</td>
<td>Unknown/disappeared</td>
</tr>
</tbody>
</table>

#### PROGRAM-SPECIFIC DATA ELEMENT—Continued

<table>
<thead>
<tr>
<th>3.11 Reason for leaving</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Other</td>
</tr>
</tbody>
</table>

### 3.12 Employment

**Rationale:** To assess the program participant’s employment status and need for employment services. This can serve as an important outcome measure.

**Data Source:** Client interview or self-administered form.

**When Data Are Collected:** In the course of client assessment and at program exit.

**Subjects:** All adults and unaccompanied youth served.
**Definition and Instructions:** In separate fields, determine: (1) If the client is currently employed; (2) if currently employed, how many hours did the client work in the last week; (3) if currently employed, is the work permanent, temporary, or seasonal; and (4) if the client is not currently working, if they are currently looking for work. Seasonal employment is work that can, by the nature of it, ordinarily only be performed during a certain season in the year. Temporary employment is work for a limited time only or for a specific piece of work and that work will last a short duration. Permanent employment is work that is contemplated to continue indefinitely.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.12 Employment</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employed</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>If currently working, number of hours worked in the past week.</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Permanent</td>
<td></td>
</tr>
<tr>
<td>2 = Temporary</td>
<td></td>
</tr>
<tr>
<td>3 = Seasonal</td>
<td></td>
</tr>
<tr>
<td>4 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>If client is not currently employed, is the client looking for work.</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** Programs may choose to ask additional information about a person’s employment status, for example any benefits (health insurance) received through employment or more detailed information on the type of employment.

**3.13 Education**

**Rationale:** To assess the program participant’s readiness for employment.

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.13 Education</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Currently in school or working on any degree or certificate</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>Received vocational training or apprenticeship certificates</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>Highest level of school completed</td>
<td>0 = No schooling completed</td>
</tr>
<tr>
<td></td>
<td>1 = Nursery school to 4th grade</td>
</tr>
<tr>
<td></td>
<td>2 = 5th grade or 6th grade</td>
</tr>
<tr>
<td></td>
<td>3 = 7th grade or 8th grade</td>
</tr>
<tr>
<td></td>
<td>4 = 9th grade</td>
</tr>
<tr>
<td></td>
<td>5 = 10th grade</td>
</tr>
<tr>
<td></td>
<td>6 = 11th grade</td>
</tr>
<tr>
<td></td>
<td>7 = 12th grade, No diploma</td>
</tr>
<tr>
<td></td>
<td>8 = High school diploma</td>
</tr>
<tr>
<td></td>
<td>9 = GED</td>
</tr>
<tr>
<td></td>
<td>10 = Post-secondary school</td>
</tr>
<tr>
<td>If client has received a high school diploma, GED or enrolled in post-secondary education, what degree(s) has the client earned.</td>
<td></td>
</tr>
</tbody>
</table>

**3.14 General Health Status**

**Rationale:** Information on general health status is a first step to identifying what types of health services a client may need. Changes in health status between intake and exit can be a valuable outcome measure. This data element permits the self-reported health status of homeless persons to be compared with the self-reported health status of the U.S. population in general.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** In the course of client assessment and at program exit.

**Subjects:** All clients served.

**Definition and Instructions:** Determine how the client assesses their health in comparison to other people their age.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.14 General health</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = Poor</td>
<td></td>
</tr>
<tr>
<td>1 = Excellent</td>
<td></td>
</tr>
<tr>
<td>2 = Very good</td>
<td></td>
</tr>
<tr>
<td>3 = Good</td>
<td></td>
</tr>
<tr>
<td>4 = Fair</td>
<td></td>
</tr>
<tr>
<td>5 = Poor</td>
<td></td>
</tr>
<tr>
<td>6 = Don’t know</td>
<td></td>
</tr>
</tbody>
</table>

**3.15 Pregnancy Status**

**Rationale:** To determine eligibility for benefits and need for services, and to determine the number of women.
entering programs for homeless persons while pregnant.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** In the course of client assessment.

**Subjects:** All females of child-bearing age served.

**Definition and Instructions:** In separate fields, determine (a) if a client is pregnant and (b), if so, what is the due date. The due date is one field that consists of the two-digit month, two-digit day and four-digit year. If the day is unknown, programs are encouraged to record "01" as a default value.

Communities that already have a policy of entering another approximate day may continue this policy. If the month is unknown, programs should leave the data field blank.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3.15 Pregnancy status</strong></td>
<td><strong>Response category</strong></td>
</tr>
<tr>
<td>Pregnancy status</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>Due date</td>
<td>/ / (Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

### 3.16 Veteran's Information

**Rationale:** To collect a more detailed profile of the homeless veteran's experience and to determine eligibility for Department of Veterans Affairs (VA) programs and benefits. These questions were developed in consultation with the VA and reflect HUD's continuing effort to standardize data definitions and standards across federal agencies.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** In the course of client assessment.

**Subjects:** All persons who answered "Yes" to Veterans Status data element.

**Definition and Instructions:** In separate fields, determine: (1) Which military service era did the client serve; (2) how many months did the client serve on active duty in the military; (3) if the client served in a war zone; (4) if the client served in a war zone, the name of the war zone; (5) if the client served in a war zone, the number of months served in the war zone; (6) if the client served in a war zone, whether the client received hostile or friendly fire; (7) what branch of the military did the client serve in; and (8) what type of discharge did the client receive. In identifying the military service era served by the client, programs are encouraged to begin with the most recent service era and proceed in descending order through the various eras. Allow clients to identify multiple service eras and branches of the military.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3.16 Veteran's information</strong></td>
<td><strong>Response category</strong></td>
</tr>
<tr>
<td>Military service era</td>
<td>1 = Persian Gulf Era (August 1991–Present)</td>
</tr>
<tr>
<td></td>
<td>2 = Post Vietnam (May 1975–July 1991)</td>
</tr>
<tr>
<td></td>
<td>3 = Vietnam Era (August 1964–April 1975)</td>
</tr>
<tr>
<td></td>
<td>4 = Between Korean and Vietnam War (February 1955–July 1964)</td>
</tr>
<tr>
<td></td>
<td>5 = Korean War (June 1950–January 1955)</td>
</tr>
<tr>
<td></td>
<td>6 = Between WWII and Korean War (August 1947–May 1950)</td>
</tr>
<tr>
<td></td>
<td>7 = World War II (September ’40–July 1947)</td>
</tr>
<tr>
<td></td>
<td>8 = Between WWI and WWII (December 1918–August 1940)</td>
</tr>
<tr>
<td></td>
<td>9 = World War I (April 1917–November 1918)</td>
</tr>
<tr>
<td>Duration of active duty</td>
<td>months</td>
</tr>
<tr>
<td>Served in a war zone</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>1 = Europe</td>
</tr>
<tr>
<td></td>
<td>2 = North Africa</td>
</tr>
<tr>
<td></td>
<td>3 = Vietnam</td>
</tr>
<tr>
<td></td>
<td>4 = Laos and Cambodia</td>
</tr>
<tr>
<td></td>
<td>5 = South China Sea</td>
</tr>
<tr>
<td></td>
<td>6 = China, Burma, India</td>
</tr>
<tr>
<td></td>
<td>7 = Korea</td>
</tr>
<tr>
<td></td>
<td>8 = South Pacific</td>
</tr>
<tr>
<td></td>
<td>9 = Persian Gulf</td>
</tr>
<tr>
<td></td>
<td>10 = Other</td>
</tr>
<tr>
<td>If yes, name of war zone</td>
<td></td>
</tr>
<tr>
<td>If yes, number of months in war zone</td>
<td>Months</td>
</tr>
<tr>
<td>If yes, received hostile or friendly fire</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>1 = Army</td>
</tr>
<tr>
<td></td>
<td>2 = Air Force</td>
</tr>
<tr>
<td></td>
<td>3 = Navy</td>
</tr>
<tr>
<td></td>
<td>4 = Marines</td>
</tr>
<tr>
<td></td>
<td>5 = Other</td>
</tr>
<tr>
<td>Branch of the military</td>
<td></td>
</tr>
</tbody>
</table>
### PROGRAM-SPECIFIC DATA ELEMENT—Continued

<table>
<thead>
<tr>
<th>3.16</th>
<th>Veteran's information</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discharge status</td>
<td></td>
<td>1 = Honorable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 = General</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 = Medical</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 = Bad conduct</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 = Dishonorable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 = Other</td>
</tr>
</tbody>
</table>

#### 3.17 Children's Education

**Rationale:** To determine if homeless children and youth have the same access to free, public education, including public preschool education, that is provided to other children and youth. It can also serve as an important outcome measure. These questions were developed in consultation with the U.S. Department of Education.

**Data Source:** Client interview or observations of program staff.

**When Data Are Collected:** In the course of client assessment. The data element is strongly recommended and may be added to HUD's APR in the future.

**Subjects:** All children between 5 and 17 years of age.

**Definition and Instructions:** For each child, determine in separate fields: (1) If the child is currently enrolled in school; (2) if the child is currently enrolled, the name of the school; (3) if the child is currently enrolled, the type school; (4) if the child is not currently enrolled in school, what date was the child last enrolled in school; and (5) what problems has the head of household had in getting the child enrolled into school.

**Required Response Categories:**

#### PROGRAM-SPECIFIC DATA ELEMENT

<table>
<thead>
<tr>
<th>3.17</th>
<th>Children's education</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current enrollment status</td>
<td></td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td>If yes, name of child's school</td>
<td></td>
<td>(Example: Lone Pine Elementary School)</td>
</tr>
<tr>
<td>If yes, type of school</td>
<td></td>
<td>1 = Public school</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 = Parochial or other private school</td>
</tr>
<tr>
<td>If not enrolled, last date of enrollment</td>
<td></td>
<td>/</td>
</tr>
<tr>
<td>If not enrolled, identify problems in enrolling child</td>
<td></td>
<td>(Month) (Year)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 = None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 = Residency requirements</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 = Availability of school records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 = Birth certificates</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 = Legal guardianship requirements</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 = Transportation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7 = Lack of available preschool programs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 = Immunization requirements</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9 = Physical examination records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10 = Other</td>
</tr>
</tbody>
</table>

**Special Issues:** Programs may choose to obtain additional information related to children's education, such as the number of school days missed over a specific period of time, the barriers to school attendance and the name and type of the school.

### EXHIBIT 4: SUMMARY OF PROGRAM-SPECIFIC DATA ELEMENTS

<table>
<thead>
<tr>
<th>Data standards</th>
<th>Subjects</th>
<th>Required for APR?</th>
<th>Data entry or computer-generated</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Income and Sources</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.2 Non-Cash Benefits</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.3 Physical Disability</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.4 Developmental disability</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.5 HIV/AIDS</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.6 Mental health</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.7 Substance Abuse</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.8 Domestic Violence</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.9 Services Received</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.10 Destination</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.11 Reasons for Leaving</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.12 Employment</td>
<td>Adults and Unaccompanied Youth</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
</tbody>
</table>
EXHIBIT 4: SUMMARY OF PROGRAM-SPECIFIC DATA ELEMENTS—Continued

<table>
<thead>
<tr>
<th>Data standards</th>
<th>Subjects</th>
<th>Required for APR?</th>
<th>Data entry or computer-generated</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13 Education</td>
<td>Adults and Unaccompanied Youth</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.14 General Health Status</td>
<td>All Clients</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.15 Pregnancy Status</td>
<td>All Females of Child-bearing Age</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.16 Veterans Information</td>
<td>All Persons who Answered &quot;Yes&quot; to Veterans Status data Element.</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.17 Children’s Education</td>
<td>Children 5–17 Years of Age</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
</tbody>
</table>

EXHIBIT 5: RECOMMENDED QUESTIONS FOR PROGRAM-SPECIFIC DATA ELEMENTS

Income and Sources

Q: "I am going to read a list of income sources and I would like for you to tell me if you [and/or the children who are coming into this program with you] have received money from any of these sources in the last month and the amount from each?” (Read each source.)

Q: "Over the last month, what was your total income? Please do not include the income of any persons in your household who are 18 years of age or older.”

Non-Cash Benefits

Q: “Have you [and/or the children who are coming into this program with you] received food stamps or money for food on a benefits card in the past month?”

Q: “Do you participate in the [insert response category] program?” (or replace with local name)

Physical Disability

Q: "Do you consider yourself to have a physical disability? By physical disability, I mean that you have a physical problem that is not temporary and that limits your ability to get around or work, or your ability to live on your own.”

Developmental Disability

Q: “Have you ever received benefits or services (such as an income supplement or special education classes) for a developmental disability?”

HIV/AIDS

Q: "Have you been diagnosed with AIDS or have you tested positive for HIV?”

Mental Health

Q: "Do you feel that you have a mental health problem such as serious depression, serious anxiety, hallucinations, violent behavior, thoughts of suicide?”

If yes, ask the following question:

Q: "Do you feel that this mental health problem will last for a long time and limits your ability to live on your own?”

Substance Abuse

Q: "Do you feel that you have a problem with alcohol?”

Q: "Do you feel that you have a problem with drugs?”

If yes to either or both questions, ask the following question:

Q: "Do you feel that this substance abuse problem will last for a long time and limits your ability to live on your own?”

Domestic Violence

Q: "Have you experienced domestic or intimate partner violence?”

If yes, ask the following question:

Q: "How long ago did you have this experience?”

Services Received

No question needed.

Destination

Q: "After you leave this program, where will you be living?”

Q: "Is this move permanent (more than 90 days) or temporary?”

Q: "Does the move involve a HUD subsidy or other subsidy?”

Reasons for Leaving

Q: "What is the main reason for leaving this program?”

Employment

Q: "Are you currently employed?”

If yes, ask the following questions:

Q: "How many hours did you work last week?”

Q: "Was this permanent, temporary, or seasonal work?”

If client reports that he/she is not working, ask the following question:

Q: "Are you currently looking for work?”

Education

Q: "Are you in school now, or working on any degree or certificate?”

Q: "Have you received any vocational training or apprenticeship certificates?”

Q: "What is the highest level of school that you have completed?”

If client has received a high school diploma or GED, ask the following questions:

Q: "Have you received any of the following degrees?” (Ask about each degree until the client answers “no.”)

General Health Status

Q: "Compared to other people your age, would you say your health is excellent, very good, good, fair, or poor?”

Pregnancy Status

Q: "Are you pregnant?”

If yes, then ask the following question:

Q: "What is your due date?”

Veterans Information

Q: "In which military service eras did you serve (choose all that apply)?”

Q: "How many months did you serve on active duty in the military?”
**EXHIBIT 5: RECOMMENDED QUESTIONS FOR PROGRAM-SPECIFIC DATA ELEMENTS—Continued**

Q: "Did you serve in a war zone?"
Q: "What war zone(s) (choose all that apply)?"
Q: "What was the number of years served in a war zone?"
Q: "Did you ever receive hostile or friendly fire in a war zone?"
Q: "What branch of the military did you serve in?"
Q: "What type of discharge did you receive?"

**Children’s Education**
Q: "Is [name of child] currently enrolled in school?"
If child is currently enrolled, ask:
Q: "What is the name of the child’s school(s)?"
Q: "What type of school is it? Is it a public or private school?"
If child is currently not enrolled in school, ask:
Q: "When was [name of child] last enrolled in school?"
Q: "I’m going to read a list of problems that you may have had getting your child into a school. Please tell me if you have experienced any of these problems for [name of child]." (Ask each.)

**EXHIBIT 6: REQUIRED RESPONSE CATEGORIES FOR PROGRAM-SPECIFIC DATA ELEMENTS**

<table>
<thead>
<tr>
<th>Source of income</th>
<th>Amount from source</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Earned Income</td>
<td>$___.00</td>
</tr>
<tr>
<td>2 = Unemployment Insurance</td>
<td>___.00</td>
</tr>
<tr>
<td>3 = Supplemental Security Income or SSI</td>
<td>___.00</td>
</tr>
<tr>
<td>4 = Social Security Disability Income (SSDI)</td>
<td>___.00</td>
</tr>
<tr>
<td>5 = A veteran’s disability payment</td>
<td>___.00</td>
</tr>
<tr>
<td>6 = Private disability insurance</td>
<td>___.00</td>
</tr>
<tr>
<td>7 = Worker’s compensation</td>
<td>___.00</td>
</tr>
<tr>
<td>8 = Temporary Assistance for Needy Families (TANF) (or use local program name)</td>
<td>___.00</td>
</tr>
<tr>
<td>9 = General Assistance (GA) (or use local program name)</td>
<td>___.00</td>
</tr>
<tr>
<td>10 = Retirement income from Social Security</td>
<td>___.00</td>
</tr>
<tr>
<td>11 = Veteran’s pension</td>
<td>___.00</td>
</tr>
<tr>
<td>12 = Pension from a former job</td>
<td>___.00</td>
</tr>
<tr>
<td>13 = Child support</td>
<td>___.00</td>
</tr>
<tr>
<td>14 = Alimony or other spousal support</td>
<td>___.00</td>
</tr>
<tr>
<td>15 = Other source</td>
<td>___.00</td>
</tr>
<tr>
<td>16 = No financial resources</td>
<td>___.00</td>
</tr>
</tbody>
</table>

**3.2 Source of non-cash benefit:**

<table>
<thead>
<tr>
<th>Source of non-cash benefit</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Food stamps or money for food on a benefits card</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>2 = MEDICAID health insurance program (or use local name)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>3 = MEDICARE health insurance program (or use local name)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>4 = State Children’s Health Insurance Program (or use local name)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>5 = Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>6 = Veteran’s Administration (VA) Medical Services</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>7 = TANF Child Care services (or use local name)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>8 = TANF transportation services (or use local name)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>9 = Other TANF-funded services (or use local name)</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>10 = Section 8, public housing, or other rental assistance</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>11 = Other source</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>12 = Other source</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>13 = Other source</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>14 = Other source</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>15 = Other source</td>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>16 = Other source</td>
<td>0 = No 1 = Yes</td>
</tr>
</tbody>
</table>

**3.3 Physical disability**

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
</tbody>
</table>

**3.4 Developmental disability**

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
</tbody>
</table>

**3.5 HIV/AIDS**

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
</tbody>
</table>

**3.6 Mental Health:**

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
<tr>
<td>0 = No 1 = Yes</td>
</tr>
</tbody>
</table>

**3.7 Substance abuse:**

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Alcohol abuse</td>
</tr>
<tr>
<td>2 = Drug abuse</td>
</tr>
<tr>
<td>3 = Duly diagnosed</td>
</tr>
<tr>
<td>3.8 Domestic violence:</td>
</tr>
<tr>
<td>----------------------</td>
</tr>
<tr>
<td>Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently.</td>
</tr>
<tr>
<td>(If yes) When experience occurred</td>
</tr>
<tr>
<td>Response category</td>
</tr>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Within the past three months.</td>
</tr>
<tr>
<td>2 = Three to six months ago.</td>
</tr>
<tr>
<td>3 = From six to twelve months ago.</td>
</tr>
<tr>
<td>4 = More than a year ago.</td>
</tr>
<tr>
<td>8 = Don't know.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3.9 Services received:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of service</td>
</tr>
<tr>
<td>Service type</td>
</tr>
<tr>
<td>Response Category</td>
</tr>
<tr>
<td>Examples;</td>
</tr>
<tr>
<td>(Month) (Day) (Year)</td>
</tr>
<tr>
<td>1 = Food</td>
</tr>
<tr>
<td>2 = Housing placement</td>
</tr>
<tr>
<td>3 = Material goods</td>
</tr>
<tr>
<td>4 = Temporary housing and other financial aid</td>
</tr>
<tr>
<td>5 = Transportation</td>
</tr>
<tr>
<td>6 = Consumer assistance and protection</td>
</tr>
<tr>
<td>7 = Criminal justice/legal services</td>
</tr>
<tr>
<td>8 = Education</td>
</tr>
<tr>
<td>9 = Health care</td>
</tr>
<tr>
<td>10 = HIV/AIDS-related services</td>
</tr>
<tr>
<td>11 = Mental health care/counseling</td>
</tr>
<tr>
<td>12 = Substance abuse services</td>
</tr>
<tr>
<td>13 = Employment</td>
</tr>
<tr>
<td>14 = Case/care management</td>
</tr>
<tr>
<td>15 = Day care</td>
</tr>
<tr>
<td>16 = Personal enrichment</td>
</tr>
<tr>
<td>17 = Outreach</td>
</tr>
<tr>
<td>18 = Other</td>
</tr>
<tr>
<td>(08/31/1965)</td>
</tr>
<tr>
<td>Emergency food programs and food pantries.</td>
</tr>
<tr>
<td>Housing search.</td>
</tr>
<tr>
<td>Clothing and personal hygiene items.</td>
</tr>
<tr>
<td>Rent payment or deposit assistance.</td>
</tr>
<tr>
<td>Bus passes and mass transit tokens.</td>
</tr>
<tr>
<td>Money management counseling and acquiring identification/SSN.</td>
</tr>
<tr>
<td>Legal counseling and immigration services.</td>
</tr>
<tr>
<td>GED instruction, bilingual education, and literacy programs.</td>
</tr>
<tr>
<td>Disability screening, health care referrals, and health education (excluding HIV/AIDS-related services, mental health care/counseling, and substance abuse services).</td>
</tr>
<tr>
<td>HIV testing, AIDS treatment, AIDS/HIV prevention and counseling.</td>
</tr>
<tr>
<td>Telephone crisis hotlines and psychiatric programs.</td>
</tr>
<tr>
<td>Detoxification and alcohol/drug abuse counseling.</td>
</tr>
<tr>
<td>Job development and job finding assistance.</td>
</tr>
<tr>
<td>Development of plans for the evaluation, treatment and/or care of persons needing assistance in planning or arranging for services.</td>
</tr>
<tr>
<td>Child care centers and infant care centers.</td>
</tr>
<tr>
<td>Life skills education, social skills training, and stress management.</td>
</tr>
<tr>
<td>Street outreach.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3.10 Destination:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Destination</td>
</tr>
<tr>
<td>Response category</td>
</tr>
<tr>
<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher)*.</td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons (including homeless youth)*.</td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab).</td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility.</td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center.</td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric).</td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility.</td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent.</td>
</tr>
<tr>
<td>11 = Apartment or house that you own.</td>
</tr>
<tr>
<td>12 = Staying or living in a family member's room, apartment, or house.</td>
</tr>
<tr>
<td>13 = Staying or living in a friend's room, apartment, or house.</td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher.</td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home.</td>
</tr>
<tr>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside).</td>
</tr>
<tr>
<td>17 = Other.</td>
</tr>
<tr>
<td>8 = Don't Know.</td>
</tr>
<tr>
<td>Tenure</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>0 = None.</td>
</tr>
<tr>
<td>1 = Permanent.</td>
</tr>
<tr>
<td>2 = Transitional.</td>
</tr>
<tr>
<td>3 = S+C.</td>
</tr>
<tr>
<td>4 = HOME program.</td>
</tr>
<tr>
<td>5 = HOPWA program.</td>
</tr>
<tr>
<td>6 = Other housing subsidy.</td>
</tr>
<tr>
<td>8 = Don't Know.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

For response categories marked with an asterisk (*), these destinations are currently not eligible for HOPWA funding.

3.11  Reason for leaving:
Reason for leaving .......................... 1 = Left for a housing opportunity before completing program.
2 = Completed program.
3 = Non-payment of rent/occupancy charge.
4 = Non-compliance with project.
5 = Criminal activity/destruction of property/violence.
6 = Reached maximum time allowed by project.
7 = Needs could not be met by project.
8 = Disagreement with rules/persons.
9 = Death.
10 = Unknown/disappeared.
11 = Other.

3.12  Employment:
Employed ........................................... 0 = No 1 = Yes
If currently working, number of hours worked in the past week.
Employment tenure ............................. 1 = Permanent.
2 = Temporary.
3 = Seasonal.
0 = No 1 = Yes

3.13  Education:
Currently in school or working on any degree or certificate.
Received vocational training or apprenticeship certificates.
Highest level of school completed ............
0 = No 1 = Yes
0 = No 1 = Yes
0 = No schooling completed.
1 = Nursery school to 4th grade.
2 = 5th grade or 6th grade.
3 = 7th grade or 8th grade.
4 = 9th grade.
5 = 10th grade.
6 = 11th grade.
7 = 12th grade, No diploma.
8 = High school diploma.
9 = GED.
10 = Post-secondary school.
0 = None.
1 = Associates Degree.
2 = Bachelors.
3 = Masters.
4 = Doctorate.
5 = Other graduate/professional degree.

3.14  General Health:
1 = Excellent.
2 = Very good.
3 = Good.
4 = Fair.
5 = Poor.
8 = Don't Know.

3.15  Pregnancy Status:
Pregnancy Status ............................... 0 = No 1 = Yes
4. HMIS Privacy and Security Standards

This section of the Notice describes standards for the privacy and security of personal information collected and stored in an HMIS. The standards seek to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data. These privacy and security standards are based on principles of fair information practices and on security standards recognized by the information privacy and technology communities. The standards were developed after careful review of the Health Insurance Portability and Accountability Act (HIPAA) standards for securing and protecting patient information. Given the importance of ensuring data confidentiality, HUD intends to provide training and technical assistance for its grantees on this topic.

The section defines baseline standards that will be required of any organization (such as a Continuum of Care, homeless assistance provider, or HMIS software company) that records, uses, or processes PPI on homeless clients for an HMIS. This section also identifies additional protocols or policies that organizations may choose...
to adopt to enhance further the privacy and security of information collected through HMIS. Organizations are encouraged to apply these additional protections to protect client information as they deem appropriate. They must also comply with federal, state and local laws that require additional confidentiality protections.

This two-tiered approach recognizes the broad diversity of organizations that participate in HMIS and the differing programmatic and organizational realities that may demand a higher standard for some activities. Some organizations (e.g., such as those serving victims of domestic violence) may choose to implement higher levels of privacy and security standards because of the nature of their homeless population and/or service provision. Others (e.g., large emergency shelters) may find the higher standards overly burdensome or impractical. At a minimum, however, all organizations must meet the baseline privacy and security requirements described in this section. This approach provides a uniform floor of protection for homeless clients with the possibility of additional protections for organizations with additional needs or capacities.

Sections 4.1 and 4.2 discuss HMIS privacy standards. Section 4.3 discusses security standards.

4.1. HMIS Privacy Standards: Definitions and Scope

4.1.2. Applying the HMIS Privacy and Security Standards

These privacy standards apply to any homeless assistance organization that records, uses or processes protected personal information (PPI) for an HMIS. A provider that meets this definition is referred to as a covered homeless organization (CHO). All PPI maintained by a CHO is subject to these standards.

Any CHO that is covered under the HIPAA is not required to comply with the privacy or security standards in this Notice if the CHO determines that a substantial portion of its PPI about homeless clients or homeless individuals is protected health information as defined in the HIPAA rules. Exempting HIPAA covered entities from the HMIS privacy and security rules avoids all possible conflicts between the two sets of rules. The HMIS standards give precedence to the HIPAA privacy and security rules because: (1) The HIPAA rules are more finely attuned to the requirements of the health care system; (2) the HIPAA rules provide important privacy and security protections for protected health information; and (3) requiring a homeless provider to comply with or reconcile two sets of rules would be an unreasonable burden.

It is possible that part of a homeless organization’s operations may be covered by the HMIS standards while another part is covered by the HIPAA standards. A CHO that, because of organizational structure, legal requirement, or other reason, maintains personal information about a homeless client that does not fall under the privacy and security standards in this section (e.g., the information is subject to the HIPAA health privacy rule) must describe that information in its privacy notice and explain the reason the information is not covered. The purpose of the disclosure requirement is to avoid giving the impression that all personal information will be protected under the HMIS standards if other standards or if no standards apply.

4.1.3. Allowable HMIS Uses and Disclosures of Protected Personal Information (PPI)

A CHO may use or disclose PPI from an HMIS under the following circumstances: (1) To provide or coordinate services to an individual; (2) for functions related to payment or reimbursement for services; (3) to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions; or (4) for creating de-identified PPI.

CHOs, like other institutions that maintain personal information about individuals, have obligations that may transcend the privacy interests of clients. The following additional uses and disclosures recognize those obligations to use or share personal information by balancing competing interests in a responsible and limited way. Under the HMIS privacy standard, these additional uses and disclosures are permissive and not mandatory (except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards). However, nothing in this standard modifies an obligation under applicable law to use or disclose personal information.

Uses and disclosures required by law. A CHO may use or disclose PPI when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law.

Uses and disclosures to avert a serious threat to health or safety. A CHO may, consistent with applicable law and standards of ethical conduct, use or disclose PPI if: (1) The CHO, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

Uses and disclosures about victims of abuse, neglect or domestic violence. A CHO may disclose PPI about an individual whom the CHO reasonably believes to be a victim of abuse, neglect or domestic violence to a government authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence under any of the following circumstances:

- Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
- If the individual agrees to the disclosure; or
- To the extent that the disclosure is expressly authorized by statute or regulation; and the CHO believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be

4. HMIS Uses and Disclosures. The uses and disclosures of PPI that are allowed by these standards.

1. Protected Personal Information (PPI). Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

2. Covered Homeless Organization (CHO). Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.

3. Processing. Any operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the information.

4. HMIS Uses and Disclosures. The uses and disclosures of PPI that are allowed by these standards.
materially and adversely affected by waiting until the individual is able to agree to the disclosure.

A CHO that makes a permitted disclosure about victims of abuse, neglect or domestic violence must promptly inform the individual that a disclosure has been or will be made, except if:

- The CHO, in the exercise of professional judgment, believes informing the individual would place the individual at risk of serious harm; or
- The CHO would be informing a personal representative (such as a family member or friend), and the CHO reasonably believes the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as determined by the CHO, in the exercise of professional judgment.

Uses and disclosures for academic research purposes. A CHO may use or disclose PPI for academic research conducted by an individual or institution that has a formal relationship with the CHO if the research is conducted either:

- By an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a program administrator (other than the individual conducting the research) designated by the CHO; or
- By an institution for use in a research project conducted under a written research agreement approved in writing by a program administrator designated by the CHO.

A written research agreement must:

1. Establish rules and limitations for the processing and security of PPI in the course of the research;
2. Provide for the return or proper disposal of all PPI at the conclusion of the research;
3. Restrict additional use or disclosure of PPI, except where required by law; and
4. Require that the recipient of data formally agree to comply with all terms and conditions of the agreement.

A written research agreement is not a substitute for approval of a research project by an Institutional Review Board, Privacy Board or other applicable human subjects protection institution.

Disclosures for law enforcement purposes. A CHO may, consistent with applicable law and standards of ethical conduct, disclose PPI for a law enforcement purpose to a law enforcement official under any of the following circumstances:

- In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena;
- If the law enforcement official makes a written request for protected personal information that: (1) Is signed by a supervisory official of the law enforcement agency seeking the PPI; (2) states that the information is relevant and material to a legitimate law enforcement investigation; (3) identifies the PPI sought; (4) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and (5) states that de-identified information could not be used to accomplish the purpose of the disclosure.
- If the CHO believes in good faith that the PPI constitutes evidence of criminal conduct that occurred on the premises of the CHO;
- In response to an oral request for the purpose of identifying or locating a fugitive, missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics; or
- If (1) the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(b)(6), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and (2) the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.

4.2. Privacy Requirements

All CHOs must comply with the baseline privacy requirements described here with respect to data collection limitations; data quality; purpose and use limitations; openness; access and correction; and accountability. A CHO may adopt additional substantive and procedural privacy protections that exceed the baseline requirements for each of these areas. A CHO must comply with federal, state and local laws that require additional confidentiality protections. All additional protections must be described in the CHO's privacy notice. A CHO must comply with all baseline privacy protections and with all additional privacy protections included in its privacy notice.

A CHO may maintain a common data storage medium with another organization (including but not limited to another CHO) that includes the sharing of PPI. When PPI is shared between organizations, responsibilities for privacy and security may reasonably be allocated between the organizations.

Organizations sharing a common data storage medium and PPI may adopt differing privacy and security policies as they deem appropriate, administratively feasible, and consistent with these HMIS privacy and security standards, as long as these privacy and security policies allow for the unduplication of homeless clients at the CoC level.

4.2.1. Collection Limitation

Baseline requirement. A CHO may collect PPI only when appropriate to the purposes for which the information is obtained or when required by law. A CHO must collect PPI by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.

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. Providers may use the following language to meet this standard: "We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate."

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Restricting collection of personal data, other than required HMIS data elements;
2. Collecting PPI only with the express knowledge or consent of the individual (unless required by law); and
3. Obtaining oral or written consent from the individual for the collection of personal information from the individual or from a third party.

4.2.2 Data Quality

Baseline Requirement. PPI collected by a CHO must be relevant to the purpose for which it is to be used. To the extent necessary for those purposes, PPI should be accurate, complete and timely.

A CHO must develop and implement a plan to dispose of, or, in the alternative, to remove identifiers from, PPI that is not in current use seven years after the PPI was created or last changed
4.2.4. Openness

Baseline Requirement. A CHO must publish a privacy notice describing its policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request. If a CHO maintains a public web page, the CHO must post the current version of its privacy notice on the web page. A CHO may, if appropriate, omit its street address from its privacy notice. A CHO must post a sign stating the availability of its privacy notice to any individual who requests a copy.

A CHO must state in its privacy notice that the policy may be amended at any time and that amendments may affect information obtained by the CHO before the date of the change. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. All amendments to the privacy notice must be consistent with the requirements of these privacy standards. A CHO must maintain permanent documentation of all privacy notice amendments.

CHOs are reminded that they are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. See 24 CFR 8.6; 28 CFR 36.303. Note: This obligation does not apply to CHOs who do not receive federal financial assistance and who are also exempt from the requirements of Title III of the Americans with Disabilities Act because they qualify as ‘‘religious entities’’ under that Act.

In addition, CHOs that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program. See HUD Limited English Proficiency Recipient Guidance published on December 18, 2003 (68 FR 70966).

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Making a reasonable effort to offer a copy of the privacy notice to each client at or around the time of data collection or at another appropriate time;
2. Giving a copy of its privacy notice to each client on or about the time of first data collection. If the first contact is over the telephone, the privacy notice may be provided at the first in-person contact (or by mail, if requested); and/or
3. Adopting a policy for changing its privacy notice that includes advance notice of the change, consideration of public comments, and prospective application of changes.

4.2.5. Access and Correction

Baseline Requirement. In general, a CHO must allow an individual to inspect and to have a copy of any PPI about the individual. A CHO must offer to explain any information that the individual may not understand.

A CHO must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual. A CHO is not required to remove any information but may, in the alternative, mark information as inaccurate or incomplete and may supplement it with additional information.

In its privacy notice, a CHO may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual’s PPI:

1. Information compiled in reasonable anticipation of litigation or comparable proceedings;
2. Information about another individual (other than a health care or homeless provider);
3. Information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; or
4. Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

A CHO can reject repeated or harassing requests for access or correction. A CHO that denies an individual’s request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the protected personal information about the individual.

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Accepting an appeal of a denial of access or correction by adopting its own
personal protected information is stored, including, but not limited to, a CHO's networks, desktops, laptops, mini-computers, mainframes and servers.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by applying system security provisions to all electronic and hard copy information that is not collected specifically for the HMIS. A CHO may also seek an outside organization to perform an internal security audit and certify system security.

User Authentication. Baseline Requirement. A CHO must secure HMIS systems with, at a minimum, a user authentication system consisting of a username and a password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:

1. Using at least one number and one letter;
2. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and/or
3. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use. Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location. Individual users must not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Additional Security Protections. A CHO may commit to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:

1. upper and lower-case letters;
2. numbers; and/or
3. symbols.

A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase, and substitute numbers and symbols for letters in any given word. For example, the phrase "secure password" can be modified to "$3cur3P@SSw0rd" by replacing the letter "s" with "$", the letter "e" with the number "3," the letter "a" with "@", and the letter "o" with the number "0," and eliminating spaces between words.

Virus Protection. Baseline Requirement. A CHO must protect HMIS systems from viruses by using commercially available virus protection software. Virus protection must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed. A CHO must regularly update virus definitions from the software vendor.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically scanning all files for viruses when the system is turned on, shut down or not actively being used.

Firewalls. Baseline Requirement. A CHO must protect HMIS systems from malicious intrusion behind a secure firewall. Each individual workstation does not need its own firewall, as long as there is a firewall between that workstation and any systems, including the Internet and other computer networks, located outside of the organization. For example, a workstation that accesses the Internet through a modem would need its own firewall. A workstation that accesses the Internet through a central server would not need a firewall as long as the server has a firewall. Firewalls are commonly included with all new operating systems. Older operating systems can be equipped with secure firewalls that are available both commercially and for free on the Internet.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by applying a firewall to all HMIS workstations and systems.

Public Access. Baseline Requirement. HMIS that use public forums for data collection or reporting must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, or extranets that limit access based on the Internet Provider (IP) address, or similar means. A public forum includes systems with public access to any part of the computer through the Internet, modems, bulletin boards, public kiosks or similar areas. Further information on these tools can be found in the HMIS Consumer Guide and the HMIS Implementation Guide, both available on HUD's Web site.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates and extranets that limit access based on the IP address. A very secure system would not house any...
HMIS data on systems that are accessible to the general public.

Physical Access to Systems With Access to HMIS Data. Baseline Requirement. A CHO must staff computers stationed in public areas that are used to collect and store HMIS data at all times. When workstations are not in use and staff are not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals.

After a short amount of time, workstations should automatically turn on a password protected screen saver when the workstation is temporarily not in use. Password protected screen savers are a standard feature with most operating systems and the amount of time can be regulated by a CHO. If staff from a CHO are gone for an extended period of time, staff should log off the data entry system and shut down the computer.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically logging users off of the HMIS application after a period of inactivity and automatically logging users off of the system after a period of inactivity. Most server operating systems come equipped with the needed software to automatically perform these functions. If staff from a CHO will be gone for an extended period of time, staff should store the computer and data in a locked room.

Disaster Protection and Recovery. Baseline Requirement. A CHO must copy all HMIS data on a regular basis to another medium (e.g., tape) and store it in a secure off-site location where the required privacy and security standards would also apply. A CHO that stores data in a central server, mini-computer or mainframe must store the central server, mini-computer or mainframe in a secure room with appropriate temperature control and fire suppression systems. Surge suppressors must be used to protect systems used for collecting and storing all the HMIS data.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by providing, among other options, fire and water protection at the off-site location that houses the storage medium. A CHO may also seek an outside organization to conduct a disaster protection audit.

Disposal. Baseline Requirement. In order to delete all HMIS data from a data storage medium, a covered homeless organization must reformat the storage medium. A CHO should reformat the storage medium more than once before reusing or disposing the medium.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by destroying media at a bonded vendor to ensure all the HMIS data is completely destroyed.

System Monitoring. Baseline Requirement. A CHO must use appropriate methods to monitor security systems. Systems that have access to any HMIS data must maintain a user access log. Many new operating systems and web servers are equipped with access logs and some allow the computer to email the log information to a designated user, usually a system administrator. Logs must be checked routinely.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by checking user access logs routinely for inappropriate access, hardware and software problems, errors and viruses, or purchasing one of several software applications available that track the status of individual files on computers. These applications are used to make sure that files are not being changed when they are not supposed to be. The applications inform the system administrator if a computer has been hacked, infected with a virus, has been restarted, or if the data files have been tampered with.

4.3.2. Application Security

These provisions apply to how all the HMIS data are secured by the HMIS application software.

Applicability. Baseline Requirement. A CHO must apply application security provisions to the software during data entry, storage and review or any other processing function.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements as needed.

User Authentication. Baseline Requirement. A CHO must secure all electronic HMIS data with, at a minimum, a user authentication system consisting of a username and a password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:

1. Using at least one number and one letter;
2. Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use;
3. Not using, or including, the username, the HMIS name, or the HMIS vendor’s name; and
4. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards. Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location. Individual users should not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:

1. Upper and lower-case letters;
2. Numbers; and
3. Symbols.

A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase and substitute numbers and symbols for letters in any given word. For example, the phrase “secure password” can be modified to “$3cur9P@Sw0rd” by replacing the letter “s” with “$,” the letter “a” with “@” and the letter “o” with the number “0,” and eliminating spaces between words.

Electronic Data Transmission. Baseline Requirement. A CHO must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks or phone lines to current industry standards. The current standard is 128-bit encryption. Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network would have secure direct connections.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates to verify the workstations involved in the electronic data transmission, and by restricting access between the workstations using IP addresses. A very secure system would not transmit any protected information over a public system like the Internet.

Electronic Data Storage. Baseline Requirement. A CHO must store all HMIS data in a binary, not text, format. A CHO that uses one of several common
applications (e.g., Microsoft Access, Microsoft SQL Server and Oracle) are already storing data in binary format and no other steps need to be taken.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by requiring that all PPI be stored in an encrypted format using at least the current industry standard. The current standard is a 128-bit key.

4.3.3. Hard Copy Security

This section provides standards for securing hard copy data.

Applicability. Baseline Requirement. A CHO must secure any paper or other hard copy containing personal protected information that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by applying hard copy security provisions to paper and hard copy information that is not collected specifically for the HMIS.

Security. Baseline Requirement. A CHO must supervise at all times any paper or other hard copy generated by or for HMIS that contains PPI when the hard copy is in a public area. When CHO staff are not present, the information must be secured in areas that are not publicly accessible.

Written information specifically pertaining to user access (e.g., username and password) must not be stored or displayed in any publicly accessible location.

5. Technical Standards

This section presents the technical standards that will be required for HMIS applications and for the organizations responsible for storing HMIS data. Except as otherwise provided, these standards do not specify or recommend any particular operating system, development environment, networking environment, database, hardware or other aspect of the HMIS application. This part of the Notice is primarily directed to HMIS developers and CoC system administrators.

5.1. Required HMIS Capabilities

5.1.1. Automatic Generation of Identification Numbers and Information

Based on the data collected through the client assessment process, program staff interviews, self-administered forms or review of case management records, the HMIS application must be capable of automatically generating data for each record. This capability includes the automatic generation of:

1. Unique Personal Identification Numbers (PINs) for persons who have not been previously served within the CoC, and reassignment of PINs for persons who have been served previously within a program and/or the CoC;

2. Program Identification Information that is uniquely associated with each program within a CoC and is assigned to every service episode for each client; and,

3. Household Identification Numbers for persons who have been identified as members of a household that participated in the same service episode.

Personal Identification Numbers (PINs). A PIN is a number automatically generated by the HMIS application. All records associated with the same person should be assigned the same PIN. There is no required format for the PIN as long as there is a single unique PIN for every client served in the CoC and it contains no personally identifying information.

The PIN is used to produce an unduplicated count of all persons at three levels: (1) Within a single program; (2) across multiple programs that share HMIS data (where programs agree to share such data); and/or (3) across the entire CoC database, whether or not data are shared across programs within a CoC. At each level, an HMIS must be capable of searching client records to determine if clients have been previously served. The search must involve the matching of client records using personal identifier fields (e.g., Name, Social Security Number, Date of Birth, and Gender) to retrieve a record(s) with identical or similar values in each of these fields.

Program Identification Information. Program identification information for every program offered in a CoC consists of the following four fields:

1. Federal Information Processing Standards (FIPS) Code. To find the 10-digit FIPS code consisting of a 2-digit state code, 3-digit county code and 5-digit place code: (1) Go to Web site http://geonames.usgs.gov/fips55.html; (2) click on “Search the FIPS55 Data Base”; (3) click on state from “State Number Code” pull down menu (this also tells you 2-digit state code); (4) type town or city name in “FIPS 55 Feature Name" box; and (5) click on “Send Query” and 3-digit county code and 5-digit place code will be shown;

2. Facility Code (to be locally determined);

3. Continuum of Care (CoC) Code (HUD-assigned); and

4. Program Type Code:
5.1.2. Missing Value Categories

A limited number of data elements require "don't know," "not applicable" and "refused" response categories for close-ended questions. These missing value categories and their associated codes should appear on the same list as the valid responses. For open-ended questions (e.g., name), the HMIS application should include the "don't know," "not applicable" and "refused" response categories for each field in the data element (e.g., first name, last name, middle initial and suffix).

5.1.3. Other Response Categories

Certain data elements may contain a response category labeled "other." When a data element contains such an option, there should also be within the same database table a separate alphanumeric field where the "other" value may be entered by program staff. For instance, a coded field that accepts the values "0=Red," "1=Yellow," or "9=Other" should have an accompanying field that accepts open-ended answers such as tangerine, blue or magenta.

5.1.4. Response Category Codes

Where character or numeric codes are shown next to each response category, only the character or numeric response code needs to be stored in the database. For example, "1=Yes" will be the response code on the computer screen or hard copy, but the electronic database can store "1=Yes" responses as "1" in the database. For open-ended or text answers (such as name), the full text answer or an encrypted version of it should be stored in the database.

5.1.5. Exit Dates

The HMIS should identify programs that have fixed lengths of enrollment. When a client enters such a program, the HMIS should automatically generate the exit date based on the entry date and the program's fixed length of enrollment. For example, an overnight emergency shelter has a fixed length of stay of one day. This information would be stored with the other program information like FIPS code and program code. When a client enrolls in an overnight emergency shelter, the HMIS will automatically set the client's exit date for the next day.

5.1.6. Maintaining Historical Data

An HMIS should have the ability to record client data from a limitless number of service transactions for longitudinal data analysis and assessment of client outcomes (often referred to as a "transactional" or "relational" database structure). A transactional or relational database organizes data within a set of tables from which data can be accessed or reassembled in many different ways without having to erase historical data or reorganize the database tables. For example, an HMIS may include a table that describes a client's demographic profile with columns for name, SSN, date of birth, gender, and so on. In most cases, the information in the profile table will not change. Another table may describe the client's income status: source of income, amount of income from each source, receipt of non-cash benefits, and so forth. The information in the income status table may change overtime, but all historical data should be preserved. Additional tables may include data from each service encounter by program type (e.g., mental health and/or substance abuse).

5.1.7. Data Export

Although a standard environment is not specified, any HMIS application must be capable of exporting any and all data collected into a comma-separated values text file using the following format:

- All fields in a given record are separated by a comma;
- All records within a given text file contain the same fields;
- Blank fields are signified by the comma ending the previous field (or the beginning of the line if the field is the first in the record) followed by a comma indicating the end of the empty field;
- Fields containing text information (as opposed to numeric) will be surrounded by double quotes whenever the field includes blank spaces, commas, or other symbols not part of the standard alphabet;
- The first line of the file shall be a list of the field names included in every record in the file; and
- The list of field names shall be in the same format described above.

5.2. Continuum of Care Requirements

5.2.1. Storage Requirements

The CoC must have or designate a central coordinating body that will be responsible for centralized collection and storage of HMIS data.

HMIS data must be collected at a central location at least once a year from all HMIS users within the CoC.

HMIS data must be stored at the central location for a minimum of seven years after the date of collection by the central coordinating body or designee of the CoC. The seven-year requirement is the current government standard for health and medical information.

Environmental Impact

This notice does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing, rehabilitation, alteration, demolition, or new construction, or establish, revise or provide for standards for construction or construction materials, manufactured housing, or occupancy. Accordingly, under 24 CFR 50.19(c)(1), this notice is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321).


Nelson R. Bregin,
General Deputy Assistant Secretary for Community Planning and Development.

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Appendix E

HUD HMIS Privacy and Security Standards - Summary
NOTE:
The Alameda County-wide Homeless Continuum of Care Council has chosen to implement some of the “Additional Privacy Protections” listed in this document. Additional Privacy Protections with which participating agencies/jurisdictions are required to comply are bolded in this document.

4.1. HMIS Privacy Standards: Definitions and Scope

4.1.1. Definition of Terms

Protected Personal Information (PPI)
Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that:

(1) Identifies, either directly or indirectly, a specific individual;
(2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or
(3) can be linked with other available information to identify a specific individual.

Covered Homeless Organization (CHO)
Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.

Processing
Any operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the information.

HMIS Uses and Disclosures
The uses and disclosures of PPI that are allowed by these standards.
4.2. Privacy-Requirements

- All CHO's must comply with the baseline privacy requirements described here with respect to: data collection limitations; data quality; purpose and use limitations; openness; access and correction; and accountability.

- A CHO may adopt additional substantive and procedural privacy protections that exceed the baseline requirements for each of these areas.

- A CHO must comply with federal, state and local laws that require additional confidentiality protections.

- All additional protections must be described in the CHO's privacy notice.

- A CHO must comply with all baseline privacy protections and with all additional privacy protections included in its privacy notice.

- A CHO may maintain a common data storage medium with another organization (including but not limited to another CHO) that includes the sharing of PPI.

- When PPI is shared between organizations, responsibilities for privacy and security may reasonably be allocated between the organizations.

- Organizations sharing a common data storage medium and PPI may adopt differing privacy and security policies as they deem appropriate, administratively feasible, and consistent with these HMIS privacy and security standards, as long as these privacy and security policies allow for the unduplication of homeless clients at the CoC level.
4.2.1. Collection Limitation

Baseline Requirement.

- A CHO may collect PPI only when appropriate to the purposes for which the information is obtained or when required by law.
- A CHO must collect PPI by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.
- 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.
- Providers may use the following language to meet this standard:

"We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate."

Additional Privacy Protections.

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Restricting collection of personal data, other than required HMIS data elements;

2. Collecting PPI only with the express knowledge or consent of the individual (unless required by law); and

3. Obtaining oral or written consent from the individual for the collection of personal information from the individual or from a third party.

4.2.2. Data Quality

Baseline Requirement.

- PPI collected by a CHO must be relevant to the purpose for which it is to be used. To the extent necessary for those purposes, PPI should be accurate, complete and timely,
- A CHO must develop and implement a plan to dispose of or, in the alternative, to remove identifiers from, PPI that is not in current use seven years after the PPI was created or last changed (unless a statutory, regulatory, contractual, or other requirement mandates longer retention). Standards for destroying information are provided in Section 4.3.
4.2.3. **Purpose Specification and Use Limitation**

**Baseline Requirement**

- A CHO must specify in its privacy notice the purposes for which it collects PPI and must describe all uses and disclosures.
- A CHO may use or disclose PPI only if the use or disclosure is allowed by this standard and is described in its privacy notice.
- A CHO may infer consent for all uses and disclosures specified in the notice and for uses and disclosures determined by the CHO to be compatible with those specified in the notice.
- Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures are permissive and not mandatory.
- Uses and disclosures not specified in the privacy notice can be made only with the consent of the individual or when required by law.

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Seeking either oral or written consent for some or all processing when individual consent for a use, disclosure or other form of processing is appropriate;

2. **Agreeing to additional restrictions on use or disclosure of an individual's PPI at the request of the individual if the request is reasonable.** The CHO is bound by the agreement, except if inconsistent with legal requirements;

3. Limiting uses and disclosures to those specified in its privacy notice and to other uses and disclosures that are necessary for those specified;

4. Committing that PPI may not be disclosed directly or indirectly to any government agency (including a contractor or grantee of an agency) for inclusion in any national homeless database that contains personal protected information unless required by statute;

5. Committing to maintain an audit trail containing the date, purpose and recipient of some or all disclosures of PPI;

6. Committing to make audit trails of disclosures available to the homeless individual; and

7. Limiting disclosures of PPI to the minimum necessary to accomplish the purpose of the disclosure.
4.2.4. **Openness**

*Baseline Requirement.*

- A CHO must publish a privacy notice describing its policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request.

- If a CHO maintains a public web page, the CHO must post the current version of its privacy notice on the web page.

- A CHO may, if appropriate, omit its street address from its privacy notice.

- A CHO must post a sign stating the availability of its privacy notice to any individual who requests a copy.

- A CHO must state in its privacy notice that the policy may be amended at any time and that amendments may affect information obtained by the CHO before the date of the change. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. All amendments to the privacy notice must be consistent with the requirements of these privacy standards. A CHO must maintain permanent documentation of all privacy notice amendments.

- CHO(s) are reminded that they are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. See 24 CFR 8.6; 28 CFR 36.303. Note: This obligation does not apply to CHO(s) who do not receive federal financial assistance and who are also exempt from the requirements of Title III of the Americans with Disabilities Act because they qualify as "religious entities" under that Act.

- CHO(s) that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program. See HUD Limited English Proficiency Recipient Guidance published on December 18, 2003 (68 FR 70968).

*Additional Privacy Protections.*

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. making a reasonable effort to offer a copy of the privacy notice to each client at or around the time of data collection or at another appropriate time;

2. giving a copy of its privacy notice to each client on or about the time of first data collection. If the first contact is over the telephone, the privacy notice may be provided at the first in-person contact (or by mail, if requested); and/or

3. adopting a policy for changing its privacy notice that includes advance notice of the change, consideration of public comments, and prospective application of changes.
4.2.5. **Access and Correction**

**Baseline Requirement.**

- A CHO must allow an individual to inspect and to have a copy of any PPI about the individual. A CHO must offer to explain any information that the individual may not understand.

- A CHO must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual.

- A CHO is not required to remove any information but may, in the alternative, mark information as inaccurate or incomplete and may supplement it with additional information.

- In its privacy notice, a CHO may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual's PPI:
  1. Information compiled in reasonable anticipation of litigation or comparable proceedings;
  2. Information about another individual (other than a health care or homeless provider);
  3. Information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; or
  4. Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

- A CHO can reject repeated or harassing requests for access or correction.

- A CHO that denies an individual's request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the protected personal information about the individual.

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. **Accepting an appeal of a denial of access or correction by adopting its own appeal procedure and describing the procedure in its privacy notice;**

2. Limiting the grounds for denial of access by not stating a recognized basis for denial in its privacy notice;

3. Allowing an individual whose request for correction has been denied to add to the individual's information a concise statement of disagreement. A CHO may agree to disclose the statement of disagreement whenever it discloses the disputed PPI to another person. These procedures must be described in the CHO's privacy notice; and/or

4. **Providing to an individual a written explanation of the reason for a denial of an individual's request for access or correction.**
4.2.6. **Accountability**

**Baseline Requirement.**

- A CHO must establish a procedure for accepting and considering questions or complaints about its privacy and security policies and practices.
- A CHO must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (annually or otherwise) a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. **Requiring each member of its staff (including employees, volunteers, affiliates, contractors and associates) to undergo (annually or otherwise) formal training in privacy requirements;**
2. **Establishing a method, such as an internal audit, for regularly reviewing compliance with its privacy policy;**
3. **Establishing an internal or external appeal process for hearing an appeal of a privacy complaint or an appeal of a denial of access or correction rights; and/or**
4. **Designating a chief privacy officer to supervise implementation of the CHO’s privacy standards.**
4.3. Security Standards

This section describes the standards for system, application and hard copy security. All CHO's must comply with the baseline security requirements. A CHO may adopt additional security protections that exceed the baseline requirements if it chooses.

4.3.1. System Security

Applicability.

Baseline Requirement.

- A CHO must apply system security provisions to all the systems where personal protected information is stored, including, but not limited to, a CHO's networks, desktops, laptops, mini-computers, mainframes and servers.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by applying system security provisions to all electronic and hard copy information that is not collected specifically for the HMIS.
- A CHO may also seek an outside organization to perform an internal security audit and certify system security.

User Authentication.

Baseline Requirement.

- A CHO must secure HMIS systems with, at a minimum, a user authentication system consisting of a username and a password.
- Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
  1. Using at least one number and one letter;
  2. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and/or
  3. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.
- Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use.
- Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location.
- Individual users must not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.
Additional Security Protections.

- A CHO may commit to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:
  (1) upper and lower-case letters;
  (2) numbers; and/or
  (3) symbols.

- A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase, and substitute numbers and symbols for letters in any given word.

For example, the phrase "secure password" can be modified to "$3cur3P@$wOrd" by replacing the letter "s" with "$," the letter "e" with the number "3," the letter "a" with "@" and the letter "o" with the number "0," and eliminating spaces between words.

Virus Protection.

Baseline Requirement.

- A CHO must protect HMIS systems from viruses by using commercially available virus protection software.

- Virus protection must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed.

- A CHO must regularly update virus definitions from the software vendor.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically scanning all files for viruses when the system is turned on, shut down or not actively being used.
Firewalls.

Baseline Requirement.

- A CHO must protect HMIS systems from malicious intrusion behind a secure firewall.
- Each individual workstation does not need its own firewall, as long as there is a firewall between that workstation and any systems, including the Internet and other computer networks, located outside of the organization.

For example, a workstation that accesses the Internet through a modem would need its own firewall.

A workstation that accesses the Internet through a central server would not need a firewall as long as the server has a firewall.

Firewalls are commonly included with all new operating systems.

Older operating systems can be equipped with secure firewalls that are available both commercially and for free on the Internet.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by applying a firewall to all HMIS workstations and systems.

Public Access.

Baseline Requirement.

- HMIS that use public forums for data collection or reporting must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, or extranets that limit access based on the Internet Provider (IP) address, or similar means.
- A public forum includes systems with public access to any part of the computer through the Internet, modems, bulletin boards, public kiosks or similar arenas. Further information on these tools can be found in the HMIS Consumer Guide and the HMIS Implementation Guide, both available on HUD's Web site.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates and extranets that limit access based on the IP address.
- A very secure system would not house any HMIS data on systems that are accessible to the general public.

Baseline Requirement.

- A CHO must staff computers stationed in public areas that are used to collect and store HMIS data at all times.
- When workstations are not in use and staff are not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals.
- After a short amount of time, workstations should automatically turn on a password protected screen saver when the workstation is temporarily not in use. Password protected screen savers are a standard feature with most operating systems and the amount of time can be regulated by a CHO.
- If staff from a CHO will be gone for an extended period of time, staff should log off the data entry system and shut down the computer.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically logging users off of the HMIS application after a period of inactivity and automatically logging users off of the system after a period of inactivity.
- Most server operating systems come equipped with the needed software to automatically perform these functions. If staff from a CHO will be gone for an extended period of time, staff should store the computer and data in a locked room.

Disaster Protection and Recovery.

Baseline Requirement.

- A CHO must copy all HMIS data on a regular basis to another medium (e.g., tape) and store it in a secure off-site location where the required privacy and security standards would also apply.
- A CHO that stores data in a central server, mini-computer or mainframe must store the central server, mini-computer or mainframe in a secure room with appropriate temperature control and fire suppression systems.
- Surge suppressors must be used to protect systems used for collecting and storing all the HMIS data.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by providing, among other options, fire and water protection at the off-site location that houses the storage medium.
- A CHO may also seek an outside organization to conduct a disaster protection audit.
Disposal.

Baseline Requirement.

- In order to delete all HMIS data from a data storage medium, a covered homeless organization must reformat the storage medium. A CHO should reformat the storage medium more than once before reusing or disposing the medium.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by destroying media at a bonded vendor to ensure all the HMIS data is completely destroyed.

System Monitoring.

Baseline Requirement.

- A CHO must use appropriate methods to monitor security systems.

Systems that have access to any HMIS data must maintain a user access log.

Many new operating systems and web servers are equipped with access logs and some allow the computer to email the log information to a designated user, usually a system administrator.

- Logs must be checked routinely.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by checking user access logs routinely for inappropriate access, hardware and software problems, errors and viruses, or purchasing one of several software applications available that track the status of individual files on computers.

These applications are used to make sure that files are not being changed when they are not supposed to be. The applications inform the system administrator if a computer has been hacked, infected with a virus, has been restarted, or if the data files have been tampered with.

4.3.2. Application Security

These provisions apply to how all the HMIS data are secured by the HMIS application software.

Applicability.

Baseline Requirement.

- A CHO must apply application security provisions to the software during data entry, storage and review or any other processing function.

Additional Security Protections.

A CHO may commit itself to additional security protections consistent with HMIS requirements as needed.
User Authentication.

Baseline Requirement.

- A CHO must secure all electronic HMIS data with, at a minimum, a user authentication system consisting of a username and a password.
- Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
  1. Using at least one number and one letter;
  2. Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use;
  3. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and
  4. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.
- Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location.
- Individual users should not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:
  1. Upper and lower-case letters;
  2. Numbers; and
  3. Symbols.
- A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase and substitute numbers and symbols for letters in any given word.

For example, the phrase "secure password" can be modified to "$3cur3P@$swOrd" by replacing the letter "s" with "$", the letter "e" with the number "3," the letter "a" with "@" and the letter "o" with the number "O," and eliminating spaces between words.
Electronic Data Transmission.

Baseline Requirement.

- A CHO must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks or phone lines to current industry standards. The current standard is 128- bit encryption.
- Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network would have secure direct connections.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates to verify the workstations involved in the electronic data transmission, and by restricting access between the workstations using IP addresses.
- A very secure system would not transmit any protected information over a public system like the Internet.

Electronic Data Storage.

Baseline Requirement.

- A CHO must store all HMIS data in a binary, not text, format.
- A CHO that uses one of several common applications (e.g., Microsoft Access, Microsoft SQL Server and Oracle) are already storing data in binary format and no other steps need to be taken.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by requiring that all PPI be stored in an encrypted format using at least the current industry standard. The current standard is a 128- bit key.
4.3.3. **Hard Copy Security**

This section provides standards for securing hard copy data.

**Applicability.**

**Baseline Requirement.**

- A CHO must secure any paper or other hard copy containing personal protected information that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms.

**Additional Security Protections.**

- A CHO may commit itself to additional security protections consistent with HMIS requirements by applying hard copy security provisions to paper and hard copy information that is not collected specifically for the HMIS.

**Security.**

**Baseline Requirement.**

- A CHO must supervise at all times any paper or other hard copy generated by or for HMIS that contains PPI when the hard copy is in a public area.
- When CHO staff are not present, the information must be secured in areas that are not publicly accessible.
- Written information specifically pertaining to user access (e.g., username and password) must not be stored or displayed in any publicly accessible location.
5. Technical Standards

This section presents the technical standards that will be required for HMIS applications and for the organizations responsible for storing HMIS data. Except as otherwise provided, these standards do not specify or recommend any particular operating system, development environment, networking environment, database, hardware or other aspect of the HMIS application. This part of the Notice is primarily directed to HMIS developers and CoC system administrators.

5.1. Required HMIS Capabilities.

5.1.1. Automatic Generation of Identification Numbers and Information

Based on the data collected through the client assessment process, program staff interviews, self-administered forms or review of case management records, the HMIS application must be capable of automatically generating data for each record. This capability includes the automatic generation of:

(1) Unique Personal Identification Numbers (PINs) for persons who have not been previously served within the CoC, and reassignment of PINs for persons who have been served previously within a program and/or the CoC;

(2) Program Identification Information that is uniquely associated with each program within a CoC and is assigned to every service episode for each client; and,

(3) Household Identification Numbers for persons who have been identified as members of a household that participated in the same service episode.

Personal Identification Numbers (PINs). A PIN is a number automatically generated by the HMIS application. All records associated with the same person should be assigned the same PIN. There is no required format for the PIN as long as there is a single unique PIN for every client served in the CoC and it contains no personally-identifying information. The PIN is used to produce an unduplicated count of all persons at three levels:

(1) Within a single program;

(2) across multiple programs that share HMIS data (where programs agree to share such data); and/or

(3) across the entire CoC database, whether or not data are shared across programs within a CoC.

At each level, an HMIS must be capable of searching client records to determine if clients have been previously served. The search must involve the matching of client records using personal identifier fields (e.g., Name, Social Security Number, Date of Birth, and Gender) to retrieve a record(s) with identical or similar values in each of these fields.
**Program Identification Information.**

Program identification information for every program offered in a CoC consists of the following four fields:


2. click on "Search the FIPS55 Data Base;" (3) click on state from "State Number Code" pull down menu (this also tells you 2-digit state code); (4) type town or city name in "FIPS 55 Feature Name" box; and (5) click on "Send Query" and 3-digit county code and 5-digit place code will be shown; (2) Facility Code (to be locally determined);

3. Continuum of Care (CoC) Code (HUD-assigned); and

4. Program Type Code:
   1. Emergency shelter (e.g., facility or vouchers)
   2. Transitional housing
   3. Permanent supportive housing
   4. Street outreach
   5. Homeless prevention (e.g., security deposit or one month's rent)
   6. Services-only type of program
   7. Other

The FIPS code, facility code, CoC code and program type code should be separate fields in the HMIS application. There is no requirement to merge them into a single field. For each client intake program staff are only required to enter the program type code. Programs may choose to provide more detailed response categories for the services-only type program response. However, for reporting purposes, these detailed categories must be collapsed into a single service-only type category and its associated code.

A corresponding FIPS code, facility code and CoC code should be automatically generated by the HMIS based on which facility is doing the intake. Once program identification information has been created, the HMIS must ensure that the information is associated with every service episode recorded within the CoC.
**Household Identification Numbers.**

HMIS must generate the same Household Identification Number for every person designated by program staff as being together for an episode of service. The household identification numbers assigned will be maintained in each person’s permanent record and will be unique for each service episode experienced by the client.

As discussed in previous parts of this final Notice, when a group of persons apply for services together (as a household or family), information is first recorded for the household head who is applying for services and then information is recorded for any children under 18 years of age who are applying for services with the household head. The children do not need to be present at the time the household head applies for services. The same household identification number is assigned to the adult head of household and any children who have been identified as applying for services with the head. If there are other adult members of the household (over 18 years of age) who are reported to be part of this household, a separate intake is conducted. As part of this intake, this individual is assigned the same household identification number as the other household members.
5.1.2. **Missing Value Categories**

A limited number of data elements require "don't know," "not applicable" and "refused" response categories for close-ended questions. These missing value categories and their associated codes should appear on the same list as the valid responses. For open-ended questions (e.g., name), the HMIS application should include the "don't know," "not applicable" and "refused" response categories for each field in the data element (e.g., first name, last name, middle initial and suffix).

5.1.3. **Other Response Categories**

Certain data elements may contain a response category labeled "other." When a data element contains such an option, there should also be within the same database table a separate alphanumerical field where the "other" value may be entered by program staff. For instance, a coded field that accepts the values "0=Red," "1=Yellow," or "9=other" should have an accompanying field that accepts open-ended answers such as tangerine, blue or magenta.

5.1.4. **Response Category Codes**

Where character or numeric codes are shown next to each response category, only the character or numeric response code needs to be stored in the database. For example, "1=Yes" will be the response code on the computer screen or hard copy, but the electronic database can store "1=Yes" responses as "1" in the database. For open-ended or text answers (such as name), the full text answer or an encrypted version of it should be stored in the database.

5.1.5. **Exit Dates**

The HMIS should identify programs that have fixed lengths of enrollment. When a client enters such a program, the HMIS should automatically generate the exit date based on the entry date and the program's fixed length of enrollment. For example, an overnight emergency shelter has a fixed length of stay of one day. This information would be stored with the other program information like FIPS code and program code. When a client enrolls in an overnight emergency shelter, the HMIS will automatically set the client's exit date for the next day.

5.1.6. **Maintaining Historical Data**

An HMIS should have the ability to record client data from a limitless number of service transactions for longitudinal data analysis and assessment of client outcomes (often referred to as a "transactional" or "relational" database structure). A transactional or relational database organizes data within a set of tables from which data can be accessed or reassembled in many different ways without having to erase historical data or reorganize the database tables. For example, an HMIS may include a table that describes a client's demographic profile with columns for name, SSN, date of birth, gender, and so on. In most cases, the information in the profile table will not change. Another table may describe the client's income status: source of income, amount of income from each source, receipt of non-cash benefits, and so forth. The information in the income status table may change over time, but all historical data should be preserved. Additional tables may include data from each service encounter by program type (e.g., mental health and/or substance abuse).
5.1.7. **Data Export**

Although a standard environment is not specified, any HMIS application must be capable of exporting any and all data collected into a comma-separated values text file using the following format:

- All fields in a given record are separated by a comma;
- All records within a given text file contain the same fields;
- Blank fields are signified by the comma ending the previous field (or the beginning of the line if the field is the first in the record) followed by a comma indicating the end of the empty field;
- Fields containing text information (as opposed to numeric) will be surrounded by double quotes whenever the field includes blank spaces, commas, or other symbols not part of the standard alphabet;
- The first line of the file shall be a list of the field names included in every record in the file; and
- The list of field names shall be in the same format described above.

5.2. **Continuum of Care Requirements**

5.2.1. **Storage Requirements**

- The CoC must have or designate a central coordinating body that will be responsible for centralized collection and storage of HMIS data.
- HMIS data must be collected to a central location at least once a year from all HMIS users within the CoC.
- HMIS data must be stored at the central location for a minimum of seven years after the date of collection by the central coordinating body or designee of the CoC. The seven-year requirement is the current government standard for health and medical information.

**Environmental Impact**

This notice does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing, rehabilitation, alteration, demolition, or new construction, or establish, revise or provide for standards for construction or construction materials, manufactured housing, or occupancy. Accordingly, under 24 CFR 50.19(c)(l), this notice is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321).


Nelson R. Bregon,
General Deputy Assistant Secretary/or Community Planning and Development.

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Appendix F

Sample Privacy Notice
SAMPLE POLICY

DATE: September 1, 2004

SUBJECT: Privacy and Confidentiality

1. To protect the privacy of agency clients
2. To comply with applicable laws and regulations.
3. To insure fair information practices as to:
   a. Openness
   b. Accountability
   c. Collection limitations
   d. Purpose and use limitations
   e. Access and correction
   f. Data Quality
   g. Security

STATEMENT OF POLICY:

1) Compliance Agency privacy practices will comply with all applicable laws governing HMIS client privacy/confidentiality. Applicable standards include, but are not limited to the following.
   b) HIPAA - the Health Insurance Portability Act.
   d) Alameda County-wide Continuum of Care InHOUSE Policy and Procedures manual.
   e) Alameda County-wide Continuum of Care InHOUSE partner agency sharing agreement(s).

NOTE: HIPAA statutes are more restrictive than the HMIS FR 4848-N-02 standards and in cases where both apply, HIPAA over-rides the HMIS FR 4848-N-02 standards. In cases where an agency already has a confidentiality policy designed around the HIPAA standards, that policy can be modified to include the HMIS data collection, or can be amended to create one set of standards for clients covered under HIPAA, and a second set of standards for those covered only under HMIS FR 4848-N-02. Agencies should indicate in their Privacy Notice which standards apply to their situation.
2) **Use of Information**  
PPI (protected personal information that is information which can be used to identify a specific client) can be used only for the following purposes:

a) To provide or coordinate services to a client.

b) For functions related to payment or reimbursement for services.

c) To carry out administrative functions such as legal, audit, personnel planning, oversight and management functions.

d) For creating de-personalized client identification for unduplicated counting.

e) Where disclosure is required by law.

f) To prevent or lessen a serious and imminent threat to the health or safety of an individual or the public.

g) To report abuse, neglect, or domestic violence as required or allowed by law.

h) Contractual research where privacy conditions are met (including a written agreement).

i) To report criminal activity on agency premises.

j) For law enforcement purposes in response to a properly authorized request for information from a properly authorized source.

**NOTE:** HMS FR 4848-N-02 standards list items a-d above as allowable reasons for disclosing PPI but make provisions for additional uses to meet individual agency obligations in some cases these uses (e-j above) have additional conditions, and HMS FR 4848-N-02 4.1.3 should be consulted if any of these optional items are to be included in an agency's policy. It also states that "except for first party access to information and required disclosures for oversight and compliance auditing, all uses and disclosures are permissive and not mandatory."

**NOTE:** If a client refuses to release PPI and such information is needed/required in order to provide services, the client's refusal may necessitate denial of service. Agencies may choose to make provisions for such denial of services in their policy.

3) **Collection and Notification**  
Information will be collected only by fair and lawful means with the knowledge or consent of the client.

a) PPI will be collected only for the purposes listed above.

b) Clients will be made aware that personal information is being collected and recorded and will be asked to express written consent to have their information entered in the InHOUSE system.

c) A written sign will be posted in locations where PPI is collected. This written notice will read:

"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 by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

The collection and use of all personal information is guided by strict standards of confidentiality. Our Privacy Notice is posted. A copy of our Privacy Notice is available to all clients upon request."

d) This sign will be explained in cases where the client is unable to read and/or understand it.

**NOTE:** Under HMS FR 4848-N-02, agencies are permitted to require a client to express consent to collect PPI verbally or in writing, however this is optional and not a requirement of the statute.
4) **Data Quality**  
   PPI data will be accurate, complete, timely, and relevant.
   
   a) All PPI collected will be relevant to the purposes for which it is to be used.
   
   b) Identifiers will be removed from data that is not in current use after 7 years (from date of creation or last edit) unless other requirements mandate longer retention.
   
   c) Data will be entered in a consistent manner by authorized users.
   
   d) Data will be entered in as close to real-time data entry as possible.
   
   e) Measures will be developed to monitor data for accuracy and completeness and for the correction of errors.
      
      i) The agency runs reports and queries monthly to help identify incomplete or inaccurate information.
      
      ii) The agency monitors the correction of incomplete or inaccurate information.
      
      iii) By the 15th of the following month all monitoring reports will reflect corrected data.
   
   f) Data quality is subject to routine audit by System Administrators who have administrative responsibilities for the database.

5) **Privacy Notice, Purpose Specification and Use Limitations**  
The purposes for collecting PPI data, as well as it uses and disclosures will be specified and limited.

a) The purposes, uses, disclosures, policies, and practices relative to PPI data are to be outlined in this agency Privacy Notice.

b) The agency Privacy Notice will comply with all applicable regulatory and contractual limitations.

c) The agency Privacy Notice will be made available to agency clients, or their representative, upon request and explained/interpreted as needed.

d) Reasonable accommodations will be made with regards to the Privacy Notice for persons with disabilities and non-English speaking clients as required by law.

e) PPI will be used and disclosed only as specified in the Privacy Notice, and only for the purposes specified therein.

f) Uses and disclosures not specified in the Privacy Notice can be made only with the consent of the client.

g) The Privacy Notice will be posted on the agency web site.

h) The Privacy Notice will reviewed and amended as needed.

i) Amendments to or revisions of the Privacy Notice will address the retroactivity of any changes.

j) Permanent documentation will be maintained of all Privacy Notice amendments/revisions.

k) All access to, and editing of PPI data will be tracked by an automated audit trail, and will be monitored for violations use/disclosure limitations.

**NOTE:** Items above are required by HMIS FR 4848-N-02 and/or MSHMIS policy, but agencies can restrict and limit the use of PPI data further by requiring express client consent for various types of uses/disclosures, and/or by putting restriction or limits on various kinds of uses/disclosures.
6) **Record Access and Correction** Provisions will be maintained for the access to and corrections of PPI records.

    a) Clients will be allowed to review their InHOUSE record within 5 working days of a request to do so.
    
    b) During a client review of their record, an agency staff person must be available to explain any entries the client does not understand.
    
    c) The client may request to have their record corrected so that information is up-to-date and accurate to ensure fairness in its use.
    
    d) When a correction is requested by a client, the request will be documented and the staff will make a corrective entry if the request is valid.
    
    e) A client may be denied access to their personal information for the following reasons:
    
       i) Information is compiled in reasonable anticipation of litigation or comparable proceedings;
       
       ii) Information about another individual other than the agency staff would be disclosed,
       
       iii) Information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the source of the information
       
       iv) Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.
    
    f) A client may be denied access to their personal information in the case of repeated or harassing requests for access or correction. However, if denied, documentation will be provided regarding the request and reason for denial to the individual and be made a part of the client's record.
    
    g) A grievance process may be initiated if a client feels that their confidentiality rights have been violated, if access has been denied to their personal records, or if they have been put at personal risk, or harmed.
    
    h) Any client grievances relative to the InHOUSE system will be processed/resolved according to agency grievance policy.
    
    i) A copy of any client grievances relative to InHOUSE data or other privacy/confidentiality issues and agency response are forwarded to CoC staff.
    
    j) If a client is unsatisfied with the resolution of their grievance at the agency level, the client may request mediation at the system level.
7) **Accountability**  Processes will be maintained to insure that the privacy and confidentiality of client information is protected and staff is properly prepared and accountable to carry out agency policies and procedure that govern the use of PPI data.

   a) Grievances may be initiated through the agency grievance process for considering questions or complaints regarding privacy and security policies and practices. All users of the InHOUSE system must sign a Users Agreement that specifies each staff persons' obligations with regard to protecting the privacy of PPI and indicates that they have received a copy of the agency's Privacy Notice and that they will comply with its guidelines.

   b) All users of the InHOUSE system must complete formal privacy training.

   c) A process will be maintained to document and verify completion of training requirements.

   d) A process will be maintained to monitor and audit compliance with basic privacy requirements including but not limited to auditing clients entered against signed InHOUSE Consent Releases. At minimum, a quarterly Compliance Review will be conducted and documented.

   e) A copy of any staff grievances initiated relative to privacy, confidentiality, or InHOUSE system data will be forwarded to CoC Staff.

   f) Regular user meetings will be held and issues concerning data security, client confidentiality, and information privacy will be discussed and solutions will be developed.

8) **Sharing of Information**  Client data may be shared with partnering agencies only with client approval

   a) All routine data sharing practices with partnering agencies will be documented and governed by the CoC MOU Agreement that defines the agency-determined sharing practice.

   b) A completed InHOUSE Client Release of Information (ROI) Form is needed before information may be shared electronically.

      i) The InHOUSE release is to inform the client about what is shared and with whom it is shared.

      ii) The client accepts or rejects the sharing plan, and selects the extent of sharing.

      iii) If the client rejects the sharing plan, staff will click the Security Button, which closes the record.

      iv) If the client selects collaborative sharing only, the record is "closed" with designated exceptions.

   c) Clients will be informed about and understand the benefits, risks, and available alternatives to sharing their information prior to signing an ROI, and their decision to grant permission shall be voluntary.

   d) Clients who choose not to authorize sharing of information cannot be denied services for which they would otherwise be eligible.

   e) All Client Authorization for ROI forms related to the InHOUSE system will be placed in a file to be located on premises and will be made available to the CoC Staff for periodic audits.

   f) InHOUSE-related Authorization for ROI forms will be retained for a minimum period of three (3) years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.

   g) No confidential/restricted information received from the InHOUSE system will be shared with any organization or individual without proper written consent by the client, unless otherwise permitted by applicable regulations or laws.
h) Restricted information, including progress notes and psychotherapy notes about the diagnosis, treatment, or referrals related to a medical health, disabilities, mental health disorder, drug or alcohol use, HIV/AIDS, and any violence-related concerns shall not be shared with other participating Agencies without the clients written, informed consent as documented on the Agency Authorization for Release of Restricted Information Form.

i) Sharing of restricted information is not covered under the general InHOUSE Client ROI.

ii) Sharing of restricted information must also be planned and documented through a fully executed Authorization for Release of Restricted Information Form.

iii) If a field that normally contains non-confidential information discloses confidential information.

(1) The staff completes an Authorization for Release of Restricted Information Form.

(2) If the client refuses to authorize the release, the staff closes the Assessment/Screen by clicking the lock on the screen and removing any exceptions.

i) If a client has previously given permission to share information with multiple agencies, beyond basic identifying information and non-restricted service transactions, and then chooses to revoke that permission with regard to one or more of these agencies, the affected agency/agencies will be contacted accordingly, and those portions of the record impacted by the revocation, too will be locked from further sharing.

j) All client ROI forms will include an expiration date, and once a Client ROI expires, any new information entered will be closed to sharing unless a new Client ROI is signed by the client and entered in the InHOUSE system.

9) System Security System security provisions will apply to all systems where PPI is stored: agency's networks, desktops, laptops, mini-computers, mainframes and servers.

a) Password Access:

i) Only individuals who have completed Privacy and System Training may be given access to the InHOUSE system through User IDs and Passwords.

ii) Temporary default passwords will be changed on first use.

iii) Access to PPI requires a user name and password at least 8 characters long and using at least one number and one letter.

iv) Passwords will not use or include the users name or the vendor name, and will not consist entirely of any word found in the common dictionary or any of the above words spelled backwards.

v) User Name and password may not be stored or displayed in any publicly accessible location.

vi) Passwords must be changed routinely.

vii) Users must not be able to log onto more than one workstation or location at a time.

viii) Individuals with User IDs and Passwords will not give or share assigned User IDs and Passwords to access the InHOUSE system with any other person, organization, governmental entity, business.

b) Virus Protection and Firewalls:

i) Commercial anti-virus protection software will maintained to protect all agency network systems and workstations from virus attack.

ii) Virus protection will include automated scanning of files as they are accessed by users.

iii) Virus Definitions will be updated regularly.

iv) All workstations will be protected by a firewall either through a workstation firewall or a server firewall.
c) Physical Access to Systems where InHOUSE Data is Stored
   i) Computers stationed in public places must be secured when workstations are not in use and staff is not present.
   ii) After a short period of time a password protected screen saver will be activated during time that the system is temporarily not in use.
   iii) For extended absence from a workstation, staff must log off the computer.

d) Stored Data Security and Disposal:
   i) All InHOUSE data downloaded onto a data storage medium must be maintained and stored in a secure location, not accessible to non-licensed users of the InHOUSE system.
   ii) Data containing PPI will not be downloaded to any remote access site at any time for any reason, nor transmitted outside the physical agency by any means whatsoever.
   iii) Data stored on a portable medium will be secured when not in use and will never be taken off site at any time for any reason.
   iv) Data downloaded for purposes of statistical analysis will exclude PPI whenever possible.
   v) InHOUSE data downloaded onto a data storage medium must be disposed of by reformatting as opposed to erasing or deleting. This includes hard drives.
   vi) A data storage medium will be reformatted a second time before the medium is reused or disposed of.

e) System Monitoring
   i) User access to the InHOUSE Live Web Site will be monitored using the computer access logs located on each computer's explorer "history" button, or via a central server report.

f) Hard Copy Security:
   i) Any paper or other hard copy containing PPI that is either generated by or for InHOUSE including, but not limited to report, data entry forms and signed consent forms will be secured.
   ii) Agency staff will supervise at all time hard copy with identifying information generated by or for the InHOUSE system when the hard copy is in a public area. If the staff leaves the area, the hard copy must be secured in areas not accessible by the public.
   iii) All written information pertaining to the user name and password must not be stored or displayed in any public accessible location.

g) Authorized Location Access:
   i) Access to the InHOUSE system is allowed only from authorized agency locations.

10) Agency HMIS/InHOUSE Grievance Policy  (Add details of agency HMIS grievance policy in this section. Refer to HUD Final Data Standards pp. 45930-45931, Section 4.2.5 Access and Correction and Section 4.2.6 Accountability. Your policy may be the same as for other programs. If so, simply include present policy.)

NOTE: Various important aspects of system security are the contracted responsibility of Bowman Systems and are therefore not covered in agency policy. These involve procedures and protections that take place at the site of the central server and include data backup, disaster recovery, data encryption, binary storage requirements, physical storage security, public access controls, location authentication, etc.
PROCEDURES:

NOTE: Procedures and roles relative to this policy should be defined in a procedure section. These may vary significantly from agency to agency but may include the following:

1. Participating agencies may integrate InHOUSE into the agency’s existing Privacy Notice. If the agency does not have an existing Privacy Notice agencies may adopt the HMIS Privacy Notice example or use it as a model. The Privacy Notice must reflect the agency’s privacy policy.

2. Copies of the Participation Agreement (MOU and the User Agreement/Code of Ethics may be attachments to your Policy. In addition to customizing the sample policy provided above, the agency should describe:
   a. Who will have what Access Levels on InHOUSE ServicePoint.
   b. How access to the room(s) where the InHOUSE system is being used will be controlled.
   c. Procedures for acquiring client consent.
      i. The Agency’s Privacy Notice should be posted.
      ii. How the Privacy Notice will be explained.
      iii. How and when the InHOUSE Consent Release of Information will be introduced to clients.
      iv. A copy of the second Release required for sharing restricted information
Appendix G

Client Release of Information Authorization
Alameda County-wide InHOUSE
What is the InHOUSE System?

What is InHOUSE and Why Should I Use It?
InHOUSE is a computer program to help

- Save you time by not filling out a new application at each agency using InHOUSE
- Make it easier for you to get the services you need
- Identify other services or programs for which you may be eligible
- Make sure these programs continue receiving funding to keep them open

The InHOUSE system is used by many agencies throughout the county that provide services to homeless and low-income persons. The participating agencies are listed on the back of this page.

When you request or receive services from PROGRAM NAME, information we collect about your household is entered into InHOUSE. If you give permission, the basic Intake (Application) Information is shared with all participating agencies so you do not need to completely fill out a new one every time you go somewhere else. Having your Intake in InHOUSE also helps us refer you to other services you might be eligible for.

Our funders have always required us to give them anonymous information about the characteristics of people we serve and how many services we provided. Keeping your information in the InHOUSE system helps us pool your anonymous data with others for these reports. This helps us do our job more efficiently and helps to keep funding and improve the services and programs for you and other homeless and low-income households. NO IDENTIFYING INFORMATION ABOUT YOU (name, date of birth, or social security number) WILL BE USED FOR THIS REPORTING.

What information is collected about me?

- **Basic Intake Information**: my name, social security number, age, date of birth, gender, race, ethnicity, languages spoken, veteran status, if I have a disability, employment information, household income information, household relationships, and if I have health coverage. The Intake information will ONLY be shared with the participating agencies listed on the back.

- **NO medical, HIV/AIDS, mental health, substance use, details about a disability, or any violence-related information will be shared outside of this agency unless you agree by signing a separate consent form.**

- Depending on your situation, you may also be asked for some or all of the following that will not be shared: family status, housing history, address, disability information, work skills, legal information, medical information, services needed and provided, and outcomes of services provided.

If you choose not to have your information shared in the InHOUSE system, this agency will keep your information in secure electronic records in the InHOUSE system that are not shared.
# Alameda County-wide InHOUSE Participants of InHOUSE

The agencies listed below utilize the InHOUSE system. All or some of the programs in these agencies participate in the InHOUSE system.

<table>
<thead>
<tr>
<th>A Safe Place</th>
<th>East Oakland Community Project</th>
<th>Phase III</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing Associates</td>
<td>Eden I&amp;R</td>
<td>Phoenix Programs, Inc.</td>
</tr>
<tr>
<td>Alameda County HCD</td>
<td>Emergency Shelter Program</td>
<td>Resources for Community Development</td>
</tr>
<tr>
<td>Shelter + Care Programs</td>
<td>FESCO</td>
<td>Rubicon Programs</td>
</tr>
<tr>
<td>RISE Project</td>
<td>Fred Finch Youth Center</td>
<td>Salvation Army</td>
</tr>
<tr>
<td>Alameda Point Collaborative</td>
<td>Goodwill Industries, Inc.</td>
<td>SAVE</td>
</tr>
<tr>
<td>Allied Housing</td>
<td>Health Care for the Homeless</td>
<td>Second Chance</td>
</tr>
<tr>
<td>Ark of Refuge</td>
<td>Homeless Families Program</td>
<td>Shepherd's Gate</td>
</tr>
<tr>
<td>Berkeley Food &amp; Housing Project</td>
<td>HOPE Van</td>
<td>St. Mary's Center</td>
</tr>
<tr>
<td>Berkeley Interfaith Youth Project</td>
<td>Jubilee Restoration</td>
<td>Travelers Aid Society</td>
</tr>
<tr>
<td>Bonita House, Inc.</td>
<td>LifeLong Medical Care</td>
<td>Tri-City Health Center</td>
</tr>
<tr>
<td>BOSS</td>
<td>Lutheran Social Services</td>
<td>Tri-City Homeless Coalition</td>
</tr>
<tr>
<td>Building Futures with Women and Children</td>
<td>Matilda Cleveland</td>
<td>Tri-Valley Haven for Women</td>
</tr>
<tr>
<td>Casa Vincentia</td>
<td>Oakland Army Base Workforce Collaborative</td>
<td>Women’s Daytime Drop-in Center</td>
</tr>
<tr>
<td>Chaplaincy to the Homeless</td>
<td>Operation Dignity</td>
<td>Women on the Way</td>
</tr>
<tr>
<td>City of Berkeley</td>
<td></td>
<td>Xanthos</td>
</tr>
<tr>
<td>Shelter + Care Programs</td>
<td></td>
<td>24 Hour Parent Teacher Center</td>
</tr>
<tr>
<td>City of Oakland</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
How Will Sharing My Information With Other Agencies Be Helpful to Me?

- It will be easier for me to get the services I need
- It will save me time by not filling out a new application at each agency using InHOUSE,
- It will help to identify other services or programs for which I may be eligible,
- It will help me get referred to other programs I may need.

Your participation in the InHOUSE system is important to our ability to provide you with the best possible services. It helps us to improve the quality of services available for homeless and low-income individuals and families, and to get an accurate count of people who need housing and other services.

Print Client Name: _____________________________

_____ (Initial Here) I have received and reviewed the “What is the InHOUSE System” information sheet.

By signing below, I agree that my Intake information may be shared with InHOUSE participant agencies (listed on the back of this form) for myself and (if applicable) my minor children.

I understand that if I give information about medical, HIV/AIDS, mental health, substance use, details about a disability, or any violence-related information, none of this information will be shared outside this agency unless I provide specific written consent on a separate form.

I know that the agencies in the system (listed on the back of this form) must follow strict privacy laws. The agencies in the system may change from time to time. I understand that I may cancel this authorization at any time by written request, and I understand the cancellation will not be retroactive. I understand that this release is valid for three (3) years.

__________________________  ____________________________
Signature of Client or Guardian       Date

__________________________  ____________________________
Agency Representative       Date

There may be a reason why sharing any information beyond this agency may put you or a family member at risk. If this applies to you, please discuss this with a case manager before signing this form.

You do not have to allow sharing to receive services.

☐ A Special Data Entry Instructions form has been stapled to the Intake Form.
The agencies listed below utilize the InHOUSE system. All or some of the programs in these agencies participate in the InHOUSE system.

A Safe Place
Affordable Housing Associates
Alameda County HCD
Shelter + Care Programs
RISE Project
Alameda Point Collaborative
Allied Housing
Ark of Refuge
Berkeley Food & Housing Project
Berkeley Interfaith Youth Project
Bonita House, Inc.
BOSS
Building Futures with Women and Children
Casa Vincentia
Chaplaincy to the Homeless
City of Berkeley
Shelter + Care Programs
City of Oakland
Department of Human Services

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Emergency Shelter Program
FESCO
Fred Finch Youth Center
Goodwill Industries, Inc.
Health Care for the Homeless
Homeless Families Program
HOPE Van
Jubilee Restoration
LifeLong Medical Care
Lutheran Social Services
Matilda Cleveland
Oakland Army Base Workforce Collaborative
Operation Dignity

Phase III
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Resources for Community Development
Rubicon Programs
Salvation Army
SAVE
Second Chance
Shepherd's Gate
St. Mary's Center
Travelers Aid Society
Tri-City Health Center
Tri-City Homeless Coalition
Tri-Valley Haven for Women
Women's Daytime Drop-in Center
Women on the Way
Xanthos
24 Hour Parent Teacher Center
Appendix H

HUD HMIS Required Data Elements List
| Initial | All | | | | | | | | E2.1 | E2.2 | E2.3 | E2.4 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Initial | All | | | | | | | | 104/00/0000 | Date of Birth | 2.3 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN Data Quality Code | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |
| Initial | All | | | | | | | | 123/45/6789 | SSN | 2.2 | |

**Data Field**

- **E2.1:** Other (Suffix)
- **E2.2:** Other (Last Name)
- **E2.3:** Other (Middle Name)
- **E2.4:** Other (First Name)

**Data Field**

- **PPFL Field**

---

*Alameda County-wide Homeless Continuum of Care Council*
<table>
<thead>
<tr>
<th>Type of Residence</th>
<th>Length of Stay in Previous Place</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Emergency Shelter (including a youth shelter, or hotel, motel, or commercial motel with emergency shelter voucher)</td>
<td>2.8</td>
</tr>
<tr>
<td>2. Transitional housing for homeless persons (excluding homeless youth)</td>
<td></td>
</tr>
<tr>
<td>3. Permanent housing for homeless persons (such as SHP, S+C, or PVO)</td>
<td></td>
</tr>
<tr>
<td>4. Psychiatric hospital or other psychiatric facility</td>
<td></td>
</tr>
<tr>
<td>5. Hospital (non-psychiatric)</td>
<td></td>
</tr>
<tr>
<td>6. Subsistence house without emergency shelter or detox center</td>
<td></td>
</tr>
<tr>
<td>7. Jail/prison or juvenile detention facility</td>
<td></td>
</tr>
<tr>
<td>8. Apartment or house that you own</td>
<td></td>
</tr>
<tr>
<td>9. Room or apartment or house that you rent</td>
<td></td>
</tr>
<tr>
<td>10. Foster care home or foster care group home</td>
<td></td>
</tr>
<tr>
<td>11. Sheltering or living in a friend's, room, apartment, or house</td>
<td></td>
</tr>
<tr>
<td>12. Staying of living in a family member's room, apartment, or house</td>
<td></td>
</tr>
<tr>
<td>13. Sleeping on floor in a friend's room, apartment, or house</td>
<td></td>
</tr>
<tr>
<td>14. Hotel or motel paid for without emergency shelter voucher</td>
<td></td>
</tr>
<tr>
<td>15. Foster care home or foster care group home</td>
<td></td>
</tr>
<tr>
<td>16. Place not meant for habitation (e.g., a vehicle, an abandoned building)</td>
<td></td>
</tr>
<tr>
<td>17. Other</td>
<td></td>
</tr>
<tr>
<td>18. Don't know</td>
<td></td>
</tr>
<tr>
<td>19. Yes</td>
<td></td>
</tr>
<tr>
<td>20. No</td>
<td></td>
</tr>
</tbody>
</table>

**Service Initiated/Each Adult**

- **Adults**
  - 6. Rejected
  - 8. Don't know
  - 1. Yes
  - 0. No

**Veteran Status**

- 2.6

**Gender**

- 2.5

**Race**

- 2.4

**Other Pacific Islander**

- 2.5

**White**

- 5

**Black or African American**

- 3

**Asian**

- 2

**American Indian or Alaska Native**

- 1

**Hispanic or Latino**

- 7

**Female**

- 0

**Male**

- 1

**Transgender female to male (female) (gender)**

- 3

**Transgender male to female (female) (gender)**

- 2

**Metro to male (male)**

- 1

**Metro to female (female)**

- 0

**Metro**

- 1

**Additional Data Fields and Pick Lists**

- 2.0

- 9
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<tr>
<th>Program Entry</th>
<th>All</th>
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</thead>
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<tr>
<td>Household Identification Number</td>
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<td></td>
</tr>
<tr>
<td>Program Type Code</td>
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<td></td>
</tr>
<tr>
<td>HUD Code</td>
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</tr>
<tr>
<td>Facility Code</td>
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<tr>
<td>Facility Code</td>
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<td></td>
</tr>
<tr>
<td>(Locally determined)</td>
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<td></td>
</tr>
<tr>
<td>(No formal specified)</td>
<td>2.13</td>
<td></td>
</tr>
<tr>
<td>Program Exit Date</td>
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<td></td>
</tr>
<tr>
<td>Program Exit Date</td>
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<td></td>
</tr>
<tr>
<td>Zip Date Quality Code</td>
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<td></td>
</tr>
<tr>
<td>Zip Date Code</td>
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</tr>
<tr>
<td>Date</td>
<td>2.9</td>
<td></td>
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<tr>
<td>Date</td>
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<tr>
<td>Date</td>
<td>2.9</td>
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<tr>
<td>Date</td>
<td>2.9</td>
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<tr>
<td>Date</td>
<td>2.9</td>
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</table>

Inhouse Universal Data Fields and Field Lists
ALAMEDA COUNTY-WIDE HOMELESS CONTINUUM OF CARE COUNCIL
<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>I-4 Unaccompanied Youth</th>
<th>Adults</th>
<th>Source of non-cash benefits</th>
<th>Total Monthly Income</th>
<th>Total Aid/Income</th>
<th>HIV/AIDS</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>1 = Yes</td>
<td>1 = Yes</td>
<td>1 = Yes</td>
<td>14 Other source</td>
<td>$00 = 0</td>
<td>3.3</td>
</tr>
<tr>
<td>1</td>
<td>0 = No</td>
<td>0 = No</td>
<td>0 = No</td>
<td>11 Child support</td>
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<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>13 Family TANF/Local name</td>
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<td>3.4</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>15 Other source</td>
<td>$00 = 0</td>
<td>3.3</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>16 No financial resources</td>
<td>$00 = 0</td>
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</tr>
<tr>
<td>All</td>
<td></td>
<td></td>
<td></td>
<td>17 Direct financial support</td>
<td>$00 = 0</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>18 Child support</td>
<td>$00 = 0</td>
<td>3.3</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>19 Family TANF/Local name</td>
<td>$00 = 0</td>
<td></td>
</tr>
</tbody>
</table>

Program-Specific Data Elements Required for APEX:  

* InHouse Universal Data Fields and Pick Lists  
* Alabama County-Wide Homeless Continuum of Care Council
<table>
<thead>
<tr>
<th>Each Service</th>
<th>All</th>
<th>Date of Service: 0000/00/00</th>
<th>Service Type: 3.9</th>
</tr>
</thead>
<tbody>
<tr>
<td>After admit</td>
<td>Unaccompanied Youth</td>
<td>Adults</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Adults</td>
<td>Unaccompanied Youth</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unaccompanied Youth</td>
<td>Adults</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unaccompanied Youth</td>
<td>Adults</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unaccompanied Youth</td>
<td>Adults</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unaccompanied Youth</td>
<td>Adults</td>
<td></td>
</tr>
</tbody>
</table>

3.8.1 (if yes) When experience occurred: 3.8.1

| After admit | Unaccompanied Youth | Adults | Domestic Violence Experienced | Yes | No |

3.8.1

| After admit | Unaccompanied Youth | Adults | Independent/ Substantial modifiers ability to live and indefinite duration and | Yes | No |

3.7.1

| After admit | Unaccompanied Youth | Adults | Substance Abuse Problem | Yes | No |

3.7

| After admit | Unaccompanied Youth | Adults | Independent/ Substantial modifiers ability to live and indefinite duration and | Yes | No |

3.6

| After admit | Unaccompanied Youth | Adults | Mental Health Problem | Yes | No |

3.6
<table>
<thead>
<tr>
<th>Program Exit</th>
<th>Reason for Leaving</th>
<th>Subsidy Type</th>
<th>Destination</th>
</tr>
</thead>
<tbody>
<tr>
<td>All</td>
<td>9 Rejected</td>
<td>0 None</td>
<td>3.10 Residence</td>
</tr>
<tr>
<td></td>
<td>8 Don't Know</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>7 Other Housing subsidy</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>6 HOME program</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5 HOPEA program</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>4 HOME program</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3 Section 8</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2 Public Housing</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1 Permanent</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>10 None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:** The table entries are placeholders as the content is not legible due to the image quality.
<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Other Graduate/Professional degree</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Doctorate</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Master's</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Bachelor's</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Associate's Degree</td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Post-Secondary School</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>GED, CTE, or diploma</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Technical/Trade School</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>High School Diploma</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Grade No diploma</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Grade 6th</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Grade 5th</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Grade 4th</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Grade 3rd or Below</td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

- If client has received a high school diploma, GED, or associate's degree, what degree(s) has the client earned?

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13</td>
<td>Highest level of school completed</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13</td>
<td>Received vocational training or apprenticeship certificates, any degree of certification, currently in school or working on degree</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13</td>
<td>Employed</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12</td>
<td>If client is not currently employed, is the client looking for work?</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12</td>
<td>Employment tenure</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12</td>
<td>Hours worked in the last week</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12</td>
<td>If currently working, number of hours employed</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Unaccompanied Youth</th>
<th>Adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Unknown/disappeared</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Death</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Disengaged with reintegration services</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Needs could not be met by project</td>
<td></td>
</tr>
</tbody>
</table>

- Why? Universal Data Fields and Pick Lists
<table>
<thead>
<tr>
<th>No.</th>
<th>Field</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.16</td>
<td>Branch of Service</td>
<td>1 Army, 2 Air Force, 3 Navy, 4 Marines</td>
</tr>
<tr>
<td></td>
<td>Life</td>
<td>1 Yes, 0 No</td>
</tr>
<tr>
<td></td>
<td>If YES, received hostile or friendly fire</td>
<td>1 Yes, 0 No</td>
</tr>
<tr>
<td></td>
<td>If YES, # of months in war zone</td>
<td>1, 2, 3, 4, 5, 6, 7, 8, 9, 10</td>
</tr>
<tr>
<td></td>
<td>Name of War Zone</td>
<td>1 Europe, 2 North Africa, 3 Vietnam, 4 Laos and Cambodia, 5 South China Sea, 6 China, Burma, India, 7 Korea, 8 South Pacific, 9 Persian Gulf, 10 Other</td>
</tr>
<tr>
<td></td>
<td>Seated in a war zone</td>
<td>1 Yes, 0 No</td>
</tr>
<tr>
<td></td>
<td>Duration of Active Duty</td>
<td>1, 2, 3, 4, 5, 6, 7, 8, 9, 10</td>
</tr>
<tr>
<td>3.15</td>
<td>Due Date</td>
<td>0000/00/00</td>
</tr>
<tr>
<td></td>
<td>Pregnancy Status</td>
<td>1 Yes, 0 No</td>
</tr>
<tr>
<td>3.14</td>
<td>General Health</td>
<td>1 Excellent, 2 Very good, 3 Good, 4 Fair, 5 Poor, 8 Don't know</td>
</tr>
<tr>
<td></td>
<td>Inhouse Universal Data</td>
<td>9, 08, 16, 04</td>
</tr>
<tr>
<td></td>
<td>Title</td>
<td>Alameda County-Wide Homeless Continuum of Care Council</td>
</tr>
<tr>
<td></td>
<td>Address</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Phone</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fax</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Web Address</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Email</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other Contacts</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Notes</td>
<td></td>
</tr>
<tr>
<td>Assessment</td>
<td>Enrollment</td>
<td>Discharge Status</td>
</tr>
<tr>
<td>------------</td>
<td>------------</td>
<td>------------------</td>
</tr>
<tr>
<td>All children between 5-17 yrs of age</td>
<td>If not enrolled, identify problems in enrollment</td>
<td>If not enrolled, last date of enrollment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0 = None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 = Need</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 = Residency requirement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 = Availabilily of school records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 = Birth certificates</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 = Legal guardianship requirements</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 = Transportation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7 = Lack of available preschool programs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 = Immunization requirements</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9 = Physical examination records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10 = Other</td>
</tr>
<tr>
<td>1 = Public school</td>
<td></td>
<td>3.17</td>
</tr>
<tr>
<td>2 = Parochial or other private school</td>
<td></td>
<td>3.17</td>
</tr>
<tr>
<td>3 = Yes, type of school</td>
<td></td>
<td>3.17</td>
</tr>
<tr>
<td>4 = Yes, name of child's school</td>
<td></td>
<td>3.17</td>
</tr>
<tr>
<td>5 = Other</td>
<td></td>
<td>3.17</td>
</tr>
<tr>
<td>6 = Dischargeable</td>
<td></td>
<td>3.16</td>
</tr>
<tr>
<td>7 = Hospital</td>
<td></td>
<td>3.16</td>
</tr>
<tr>
<td>8 = General</td>
<td></td>
<td>3.16</td>
</tr>
<tr>
<td>9 = Medical</td>
<td></td>
<td>3.16</td>
</tr>
<tr>
<td>10 = Other</td>
<td></td>
<td>3.16</td>
</tr>
</tbody>
</table>
Appendix I

Glossary

**Aggregate Data**
Data collected across the system which does NOT contain PPI.

**APRs**
Annual Progress Reports

**CHO**
Covered Homeless Organization. Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.

**CoC**
Continuum of Care.

**HIPAA Covered Entity**
An agency/jurisdiction that is required to comply with all HIPAA (Health Insurance Portability and Accountability Act of 1996) standards as defined by federal regulations.

**HMIS**
Homeless Management Information Systems. A computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance services and stores that data in an electronic format.

**InHOUSE**
The name InHOUSE is an acronym for Information about Homelessness, Outcomes, and Service Engagement.
MOU
Memorandum of Understanding. A signed agreement between agencies/jurisdictions and the Alameda County-wide Continuum of Care Council specifying the terms of participating in the InHOUSE system.

PPI
Protected Personal Identifiers. Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual. Data fields determined by HUD to be PPI include: first name, middle name, last name, suffix of name, other first name (alias), other middle name, other last name, other name suffix, social security number, date of birth, zip code of last permanent address, program entry date, program exit date, the client PIN number in the software application, the city code of the service provider, the facility code of the service provider, the CoC code, and the program type code.

Privacy Agreement
An agreement signed by anyone collecting data for entry into INHOUSE or working with data generated by the InHOUSE system that contains PPI, pledging to uphold all confidentiality and privacy standards set forth in the Agreement.

Privacy Notice
A document published by each agency/jurisdiction that describes its policies and practices for the processing of Protected Personal Identifiers (PPI).

ROI
Release of Information.

User Agreement
An agreement signed by all licensed users of the InHOUSE system specifying the terms of being a licensed user.
2018 HDX Competition Report
PIT Count Data for CA-502 - Oakland, Berkeley/Alameda County CoC

### Total Population PIT Count Data

<table>
<thead>
<tr>
<th></th>
<th>2016 PIT</th>
<th>2017 PIT</th>
<th>2018 PIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count</td>
<td>4145</td>
<td>5629</td>
<td>5496</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>892</td>
<td>1,022</td>
<td>962</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>0</td>
<td>11</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>856</td>
<td>744</td>
<td>660</td>
</tr>
<tr>
<td>Total Sheltered Count</td>
<td>1748</td>
<td>1766</td>
<td>1633</td>
</tr>
<tr>
<td>Total Unsheltered Count</td>
<td>2397</td>
<td>3863</td>
<td>3863</td>
</tr>
</tbody>
</table>

### Chronically Homeless PIT Counts

<table>
<thead>
<tr>
<th></th>
<th>2016 PIT</th>
<th>2017 PIT</th>
<th>2018 PIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count of Chronically Homeless Persons</td>
<td>753</td>
<td>1707</td>
<td>1742</td>
</tr>
<tr>
<td>Sheltered Count of Chronically Homeless Persons</td>
<td>214</td>
<td>298</td>
<td>333</td>
</tr>
<tr>
<td>Unsheltered Count of Chronically Homeless Persons</td>
<td>539</td>
<td>1,409</td>
<td>1,409</td>
</tr>
</tbody>
</table>
Homeless Households with Children PIT Counts

<table>
<thead>
<tr>
<th></th>
<th>2016 PIT</th>
<th>2017 PIT</th>
<th>2018 PIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children</td>
<td>316</td>
<td>270</td>
<td>256</td>
</tr>
<tr>
<td>Sheltered Count of Homeless Households with Children</td>
<td>269</td>
<td>261</td>
<td>247</td>
</tr>
<tr>
<td>Unsheltered Count of Homeless Households with Children</td>
<td>47</td>
<td>9</td>
<td>9</td>
</tr>
</tbody>
</table>

Homeless Veteran PIT Counts

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count of the Number of Homeless Veterans</td>
<td>488</td>
<td>401</td>
<td>531</td>
<td>526</td>
</tr>
<tr>
<td>Sheltered Count of Homeless Veterans</td>
<td>143</td>
<td>170</td>
<td>153</td>
<td>148</td>
</tr>
<tr>
<td>Unsheltered Count of Homeless Veterans</td>
<td>345</td>
<td>231</td>
<td>378</td>
<td>378</td>
</tr>
</tbody>
</table>
## HMIS Bed Coverage Rate

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Total Beds in 2018 HIC</th>
<th>Total Beds in 2018 HIC Dedicated for DV</th>
<th>Total Beds in HMIS</th>
<th>HMIS Bed Coverage Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Shelter (ES) Beds</td>
<td>872</td>
<td>180</td>
<td>501</td>
<td>72.40%</td>
</tr>
<tr>
<td>Safe Haven (SH) Beds</td>
<td>12</td>
<td>0</td>
<td>12</td>
<td>100.00%</td>
</tr>
<tr>
<td>Transitional Housing (TH) Beds</td>
<td>752</td>
<td>12</td>
<td>660</td>
<td>89.19%</td>
</tr>
<tr>
<td>Rapid Re-Housing (RRH) Beds</td>
<td>602</td>
<td>0</td>
<td>529</td>
<td>87.87%</td>
</tr>
<tr>
<td>Permanent Supportive Housing (PSH) Beds</td>
<td>2925</td>
<td>32</td>
<td>2267</td>
<td>78.36%</td>
</tr>
<tr>
<td>Other Permanent Housing (OPH) Beds</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Total Beds</strong></td>
<td><strong>5,163</strong></td>
<td><strong>224</strong></td>
<td><strong>3969</strong></td>
<td><strong>80.36%</strong></td>
</tr>
</tbody>
</table>
### PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

<table>
<thead>
<tr>
<th>Chronically Homeless Bed Counts</th>
<th>2016 HIC</th>
<th>2017 HIC</th>
<th>2018 HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC</td>
<td>676</td>
<td>715</td>
<td>720</td>
</tr>
</tbody>
</table>

### Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

<table>
<thead>
<tr>
<th>Households with Children</th>
<th>2016 HIC</th>
<th>2017 HIC</th>
<th>2018 HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRH units available to serve families on the HIC</td>
<td>78</td>
<td>89</td>
<td>131</td>
</tr>
</tbody>
</table>

### Rapid Rehousing Beds Dedicated to All Persons

<table>
<thead>
<tr>
<th>All Household Types</th>
<th>2016 HIC</th>
<th>2017 HIC</th>
<th>2018 HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRH beds available to serve all populations on the HIC</td>
<td>387</td>
<td>443</td>
<td>602</td>
</tr>
</tbody>
</table>
Measure 1: Length of Time Persons Remain Homeless

This measure the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

**Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.**

**Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.**

a. This measure is of the client’s entry, exit, and bed night dates strictly as entered in the HMIS system.

<table>
<thead>
<tr>
<th></th>
<th>Universe (Persons)</th>
<th>Average LOT Homeless (bed nights)</th>
<th>Median LOT Homeless (bed nights)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Persons in ES and SH</td>
<td>2266</td>
<td>2361</td>
<td>96</td>
</tr>
<tr>
<td>1.2 Persons in ES, SH, and TH</td>
<td>3249</td>
<td>3258</td>
<td>186</td>
</tr>
</tbody>
</table>

b. This measure is based on data element 3.17.

This measure includes data from each client’s Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client’s entry date, effectively extending the client’s entry date backward in time. This “adjusted entry date” is then used in the calculations just as if it were the client’s actual entry date.

The construction of this measure changed, per HUD’s specifications, between FY 2016 and FY 2017. HUD is aware that this may impact the change between these two years.
## FY2017 - Performance Measurement Module (Sys PM)

<table>
<thead>
<tr>
<th></th>
<th>Universe (Persons)</th>
<th>Average LOT Homeless (bed nights)</th>
<th>Median LOT Homeless (bed nights)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Persons in ES, SH, and PH (prior to &quot;housing move in&quot;)</td>
<td>2195</td>
<td>2354</td>
<td>276</td>
</tr>
<tr>
<td>1.2 Persons in ES, SH, TH, and PH (prior to &quot;housing move in&quot;)</td>
<td>3157</td>
<td>3466</td>
<td>356</td>
</tr>
</tbody>
</table>
Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

After entering data, please review and confirm your entries and totals. Some HMIS reports may not list the project types in exactly the same order as they are displayed below.

<table>
<thead>
<tr>
<th>Exit was from</th>
<th>Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)</th>
<th>Returns to Homelessness in Less than 6 Months</th>
<th>FY 2017</th>
<th>% of Returns</th>
<th>Returns to Homelessness from 6 to 12 Months</th>
<th>FY 2017</th>
<th>% of Returns</th>
<th>Returns to Homelessness from 13 to 24 Months</th>
<th>FY 2017</th>
<th>% of Returns</th>
<th>Number of Returns in 2 Years</th>
<th>FY 2017</th>
<th>% of Returns</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO</td>
<td>126</td>
<td>8</td>
<td>6%</td>
<td>4%</td>
<td>8</td>
<td>6%</td>
<td>21</td>
<td>17%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ES</td>
<td>617</td>
<td>92</td>
<td>15%</td>
<td>6%</td>
<td>60</td>
<td>10%</td>
<td>191</td>
<td>31%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TH</td>
<td>642</td>
<td>49</td>
<td>8%</td>
<td>5%</td>
<td>50</td>
<td>8%</td>
<td>131</td>
<td>20%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SH</td>
<td>0</td>
<td>0</td>
<td>0%</td>
<td>0%</td>
<td>0</td>
<td>0%</td>
<td>0</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH</td>
<td>936</td>
<td>35</td>
<td>4%</td>
<td>3%</td>
<td>25</td>
<td>3%</td>
<td>90</td>
<td>10%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL Returns to Homelessness</td>
<td>2321</td>
<td>184</td>
<td>8%</td>
<td>5%</td>
<td>143</td>
<td>6%</td>
<td>433</td>
<td>19%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts
This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

<table>
<thead>
<tr>
<th></th>
<th>January 2016 PIT Count</th>
<th>January 2017 PIT Count</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Total PIT Count of sheltered and unsheltered persons</td>
<td>4145</td>
<td>5629</td>
<td>1484</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>892</td>
<td>1022</td>
<td>130</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>856</td>
<td>744</td>
<td>-112</td>
</tr>
<tr>
<td>Total Sheltered Count</td>
<td>1748</td>
<td>1766</td>
<td>18</td>
</tr>
<tr>
<td>Unsheltered Count</td>
<td>2397</td>
<td>3863</td>
<td>1466</td>
</tr>
</tbody>
</table>

Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Unduplicated Total sheltered homeless persons</td>
<td>3547</td>
<td>3481</td>
<td>-66</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>2270</td>
<td>2363</td>
<td>93</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>1570</td>
<td>1370</td>
<td>-200</td>
</tr>
</tbody>
</table>
Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults (system stayers)</td>
<td>1297</td>
<td>1233</td>
<td>-64</td>
</tr>
<tr>
<td>Number of adults with increased earned income</td>
<td>50</td>
<td>78</td>
<td>28</td>
</tr>
<tr>
<td>Percentage of adults who increased earned income</td>
<td>4%</td>
<td>6%</td>
<td>2%</td>
</tr>
</tbody>
</table>

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults (system stayers)</td>
<td>1297</td>
<td>1233</td>
<td>-64</td>
</tr>
<tr>
<td>Number of adults with increased non-employment cash income</td>
<td>214</td>
<td>278</td>
<td>64</td>
</tr>
<tr>
<td>Percentage of adults who increased non-employment cash income</td>
<td>16%</td>
<td>23%</td>
<td>7%</td>
</tr>
</tbody>
</table>

Metric 4.3 – Change in total income for adult system stayers during the reporting period

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults (system stayers)</td>
<td>1297</td>
<td>1233</td>
<td>-64</td>
</tr>
<tr>
<td>Number of adults with increased total income</td>
<td>242</td>
<td>336</td>
<td>94</td>
</tr>
<tr>
<td>Percentage of adults who increased total income</td>
<td>19%</td>
<td>27%</td>
<td>8%</td>
</tr>
</tbody>
</table>
Metric 4.4 – Change in earned income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>709</td>
<td>638</td>
<td>-71</td>
</tr>
<tr>
<td>Number of adults who exited with increased earned income</td>
<td>123</td>
<td>102</td>
<td>-21</td>
</tr>
<tr>
<td>Percentage of adults who increased earned income</td>
<td>17%</td>
<td>16%</td>
<td>-1%</td>
</tr>
</tbody>
</table>

Metric 4.5 – Change in non-employment cash income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>709</td>
<td>638</td>
<td>-71</td>
</tr>
<tr>
<td>Number of adults who exited with increased non-employment cash income</td>
<td>165</td>
<td>133</td>
<td>-32</td>
</tr>
<tr>
<td>Percentage of adults who increased non-employment cash income</td>
<td>23%</td>
<td>21%</td>
<td>-2%</td>
</tr>
</tbody>
</table>

Metric 4.6 – Change in total income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>709</td>
<td>638</td>
<td>-71</td>
</tr>
<tr>
<td>Number of adults who exited with increased total income</td>
<td>270</td>
<td>211</td>
<td>-59</td>
</tr>
<tr>
<td>Percentage of adults who increased total income</td>
<td>38%</td>
<td>33%</td>
<td>-5%</td>
</tr>
</tbody>
</table>
Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Person with entries into ES, SH or TH during the reporting period.</td>
<td>2516</td>
<td>2629</td>
<td>113</td>
</tr>
<tr>
<td>Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.</td>
<td>711</td>
<td>656</td>
<td>-55</td>
</tr>
<tr>
<td>Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)</td>
<td>1805</td>
<td>1973</td>
<td>168</td>
</tr>
</tbody>
</table>

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Person with entries into ES, SH, TH or PH during the reporting period.</td>
<td>3784</td>
<td>4024</td>
<td>240</td>
</tr>
<tr>
<td>Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.</td>
<td>1096</td>
<td>1045</td>
<td>-51</td>
</tr>
<tr>
<td>Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)</td>
<td>2688</td>
<td>2979</td>
<td>291</td>
</tr>
</tbody>
</table>
Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD’s Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in FY2017 (Oct 1, 2016 - Sept 30, 2017) reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Persons who exit Street Outreach</td>
<td>1636</td>
<td>2122</td>
<td>486</td>
</tr>
<tr>
<td>Of persons above, those who exited to temporary &amp; some institutional destinations</td>
<td>582</td>
<td>756</td>
<td>174</td>
</tr>
<tr>
<td>Of the persons above, those who exited to permanent housing destinations</td>
<td>114</td>
<td>70</td>
<td>-44</td>
</tr>
<tr>
<td>% Successful exits</td>
<td>43%</td>
<td>39%</td>
<td>-4%</td>
</tr>
</tbody>
</table>

Metric 7b.1 – Change in exits to permanent housing destinations
2018 HDX Competition Report

**FY2017 - Performance Measurement Module (Sys PM)**

<table>
<thead>
<tr>
<th>Metric 7b.2 – Change in exit to or retention of permanent housing</th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing</td>
<td>3038</td>
<td>3004</td>
<td>-34</td>
</tr>
<tr>
<td>Of the persons above, those who exited to permanent housing destinations</td>
<td>1418</td>
<td>1389</td>
<td>-29</td>
</tr>
<tr>
<td>% Successful exits</td>
<td>47%</td>
<td>46%</td>
<td>-1%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Metric 7b.2 – Change in exit to or retention of permanent housing</th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Persons in all PH projects except PH-RRH</td>
<td>2494</td>
<td>2292</td>
<td>-202</td>
</tr>
<tr>
<td>Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations</td>
<td>2404</td>
<td>2226</td>
<td>-178</td>
</tr>
<tr>
<td>% Successful exits/retention</td>
<td>96%</td>
<td>97%</td>
<td>1%</td>
</tr>
</tbody>
</table>
This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.
## FY2017 - SysPM Data Quality

<table>
<thead>
<tr>
<th></th>
<th>All ES, SH</th>
<th>All TH</th>
<th>All PSH, OPH</th>
<th>All RRH</th>
<th>All Street Outreach</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Number of non-DV Beds on HIC</td>
<td>665</td>
<td>656</td>
<td>678</td>
<td>692</td>
<td>1106</td>
</tr>
<tr>
<td>2. Number of HMIS Beds</td>
<td>445</td>
<td>446</td>
<td>500</td>
<td>501</td>
<td>871</td>
</tr>
<tr>
<td>3. HMIS Participation Rate from HIC (%)</td>
<td>66.92</td>
<td>67.99</td>
<td>73.75</td>
<td>72.40</td>
<td>78.75</td>
</tr>
<tr>
<td>4. Unduplicated Persons Served (HMIS)</td>
<td>2760</td>
<td>2375</td>
<td>2347</td>
<td>2218</td>
<td>1637</td>
</tr>
<tr>
<td>5. Total Leavers (HMIS)</td>
<td>2258</td>
<td>1890</td>
<td>1870</td>
<td>1750</td>
<td>811</td>
</tr>
<tr>
<td>6. Destination of Don't Know, Refused, or Missing (HMIS)</td>
<td>358</td>
<td>105</td>
<td>112</td>
<td>235</td>
<td>32</td>
</tr>
<tr>
<td>7. Destination Error Rate (%)</td>
<td>15.85</td>
<td>5.56</td>
<td>5.99</td>
<td>13.43</td>
<td>3.95</td>
</tr>
</tbody>
</table>

**FY2017 - SysPM Data Quality**

7/27/2018 10:36:50 AM

15
2018 HDX Competition Report
Submission and Count Dates for CA-502 - Oakland, Berkeley/Alameda County CoC

Date of PIT Count

| Date CoC Conducted 2018 PIT Count | 1/30/2018 |

Report Submission Date in HDX

<table>
<thead>
<tr>
<th>Submitted On</th>
<th>Met Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>4/30/2018</td>
<td>Yes</td>
</tr>
<tr>
<td>4/30/2018</td>
<td>Yes</td>
</tr>
<tr>
<td>5/31/2018</td>
<td>Yes</td>
</tr>
</tbody>
</table>
EveryOne Home
Alameda County Continuum of Care (CoC) Council
Prioritization for Permanent Supportive Housing Opportunities

The Alameda County Continuum of Care Council, in accordance with guidance from the U.S. Housing and Urban Development (HUD) Department Office of Community Planning Notice (CPD) CPD-14-012, maintains the following priority preference groups for access to permanent support housing (PSH) opportunities within Alameda County. All households eligible for a given PSH opportunity can apply for PSH or a waiting list for PSH when applications are being received. All CoC-funded PSH opportunities will maintain marketing and tenant selection policies and procedures that have explicit preferences and prioritization for households that meet the criteria established below. The CoC will work toward establishing and maintaining up-to-date copies of the policies and procedures for access to each CoC-funded PSH opportunity. In addition, the CoC will promote the utilization of this prioritization among non-CoC funded PSH and document the use of this approach among other PSH in the County.

The funding sources and target groups among PSH opportunities within Alameda County vary significantly. The priority group described below must also meet the specific requirements of a given PSH opportunity to be considered. For example, a housing unit set aside for persons with HIV/AIDS could not be offered to someone without verification of their HIV/AIDS status. Preference for this unit would be given to someone with verified HIV/AIDS that also met the priority group criteria below.

If more than one household is being considered for a PSH housing opportunity AND both households meet the CoC priority group standards for Alameda County, THEN the household that first applied for the opportunity will be selected first. In other words, the date of application will be used to differentiate among households that meet the preference criteria. If other preference criteria are also used for a given housing opportunity, e.g., city preference, these preferences may be used prior to using the date of application to determine the household next offered the opportunity. The preferences and details of selection for a given PSH program will be identified in their marketing and tenant selection policies and procedures.

Alameda County PSH shall give preference to households that meet the following general criteria:

1) The household meets the HUD CoC definition for “chronic homelessness”  
   AND
2) The household is in at least one of the high service need groups defined below.

<table>
<thead>
<tr>
<th>Alameda County PSH</th>
<th>shall give preference to households that meet the following general criteria:</th>
</tr>
</thead>
</table>
| 1) The household  | meets the HUD CoC definition for “chronic homelessness”  
| AND               |                                                                          |
| 2) The household  | is in at least one of the high service need groups defined below.         |
HUD Chronic Homelessness Definition

(1) A homeless individual or head of household with a disability that meets the HUD definition of a disability who
   (a) lives in a place not meant for human habitation, a safe haven, or in an emergency shelter;
   AND
   (b) has been homeless and living in one of these places continuously for at least 12 months OR on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living in one of the aforementioned places.

Stays in institutional care facilities for fewer than 90 days will not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility. Institutional care facilities include jails, substance abuse or mental health treatment facilities, hospitals, or other similar facilities.

A family with an adult head of household (or if there is not adult in the family, a minor head of household) who meets all of the above criteria, including a family whose composition has fluctuated while the head of household has been homeless are also considered chronically homeless.
EveryOne Home
Alameda County Continuum of Care (CoC) Council
Prioritization for Permanent Supportive Housing Opportunities

High Service Need Group

To be considered part of the PSH high priority group individuals must be in at least one of the groups below. No extra preferences are given for individuals in more than one group.

#1: In a 12 month period (verified one or more of the following via referrals from designated agencies or administrative data)….  
a) Cherry Hill Detox or Sobering Station admissions (3 or more)  
b) Hospitalization (medical or psychiatric) admissions (3 or more)  
c) Incarcerations (3 or more)  
d) EMS transports (5 or more)  
e) Law enforcement contacts (5 or more)

#2: High Health Risk (one or more of the following verified by a clinician and/or clinical records)  
a) 60 years of age or older AND one or more chronic health conditions (heart disease, emphysema/COPD, diabetes, asthma, cancer, hepatitis C)  
b) Kidney Disease/End Stage Renal Disease or Dialysis  
c) History of Frostbite, Hypothermia, or Immersion Foot  
d) Liver Disease/Cirrhosis, or End-Stage Liver Disease  
e) HIV+/AIDS  
f) Arrhythmia  
g) Seizure Disorder  
h) Schizophrenia or Schizoaffective Disorder  
i) Tri-Morbidity  
   a) Mental health, learning, developmental, or other cognitive disability AND  
   b) Substance use disorder AND  
   c) Chronic health condition (heart disease, emphysema/COPD, diabetes, asthma, cancer, hepatitis C)

#3: VI-SPDAT assessment completed and score = 8 or more (self-report)

Elaine de Coligny, Executive Director
Everyone Home

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Summary Assessment of Racial Disparity in Alameda County: Housing Crisis Response System Access and Permanent Housing Outcomes

Comparing the general and homeless populations of Alameda County demonstrates the racial disparities that are apparent throughout the United States. African Americans appear at a 78% higher rate in the homeless population than in the general population. American Indians and Alaska Natives also evidence a 66% higher rate of homelessness, as compared with their representation in the general population. By contrast, Asians appear in Alameda County’s homeless population at a 135% lower rate than in its general population. And, Whites comprise a 50% smaller proportion of the homeless population than in the general population.

Ethnic disparities in Alameda County are slightly different from national trends. Whereas the 2017 Annual Homeless Assessment Report to Congress, Part 1 showed Hispanic/Latino identified persons represented at higher rates in the homeless population than in the general population, Alameda County’s 2017 Point In Time Count shows that Hispanic/Latinos make up a 35% smaller proportion of the homeless population than in the general population of Alameda County.

Given the disparities that are visible in the above comparisons and building upon research findings from the National Alliance to End Homelessness, the US Interagency Council on Homelessness, and the Center for Social Innovation, Alameda County must do more to address racial and ethnic disparities. As a beginning place, the continuum of care is looking closely for racial and ethnic disparities in access to the housing crisis response system and permanent housing outcomes.

In Alameda County some populations show levels of access and permanent housing outcomes that are consistent with their proportion in the homeless population. American Indian or Alaskan Natives, Asians, and Native Hawaiian or Other Pacific Islanders show equivalent rates in the population, access, and permanent housing outcome rates. By contrast, people who identify as being multi-racial represent 15% of the homeless population, 8% of the housing crisis response system, and 10% of the permanent housing exits.

African Americans have slightly higher rates of access and positive housing outcomes, making up 49% of the homeless population, 54% of the people accessing the housing crisis response system, and 58% of the total exits to permanent housing. Whites have slightly lower rates of access and positive housing outcomes, making up 30%
of the homeless population, 27% of the people accessing the housing crisis response system, and 23% of the total exists to permanent housing. As the differences are all within 5% points of each other, it does not appear at this point that people of different races or ethnicities are more, or less likely to receive homeless assistance or a positive outcome.

Hispanic/Latinos and non-Hispanic/Latino groups receive access and positive outcomes that are generally consistent with their proportion in the homeless population. As compared with their proportion in the homeless population, system access is very slightly lower among Hispanic/Latino identified clients and permanent housing outcomes are slightly higher. Non-Hispanic/Non-Latino identified clients show rates of access and permanent housing outcomes that are generally consistent with their proportion in the homeless population.

In the coming year the EveryOne Home Results Based Accountability (RBA) Committee will undertake a deeper analysis aimed at deepening our understanding of the impact of racial and ethnic disparities both within and outside the housing crisis response system. Activities will include analyzing the prioritization tool for patterned differences in vulnerability across racial and ethnic groups, exploring patterns of program use across racial and ethnic groups, interviews and focus groups with consumers, reviewing data quality, and sharing system data with partners and other stakeholders. These activities will generate qualitative and quantitative data that will enable the continuum of care to understand and respond to racial and ethnic inequalities.

In the coming year the CoC will redouble its efforts to ensure that the CoC board, EveryOne Home Leadership Board, and seated committees represent the racial and ethnic distribution of the homeless population in Alameda County. As well, we aim to increase representation of homeless and formerly homeless consumers in our governance structure. Lastly, we have plans to make critical materials available in multiple languages, including but not limited to information about coordinated entry, the consent to participate in HMIS, and the assessment tool.
Before Starting the Project Listings for the CoC Priority Listing

The FY 2018 CoC Consolidated Application requires TWO submissions. Both this Project Priority Listing AND the CoC Application MUST be submitted prior to the CoC Program Competition deadline as required by the FY 2018 CoC Program Competition NOFA.

The FY 2018 CoC Priority Listing includes the following:

- Reallocation forms – must be fully completed if the CoC is reallocating eligible renewal projects to create new projects as described in the FY 2018 CoC Program Competition NOFA.
- New Project Listing – lists all new project applications created through reallocation, the bonus, and DV Bonus that have been approved and ranked or rejected by the CoC.
- Renewal Project Listing – lists all eligible renewal project applications that have been approved and ranked or rejected by the CoC.
- UFA Costs Project Listing – applicable and only visible for Collaborative Applicants that were designated as a Unified Funding Agency (UFA) during the FY 2018 CoC Program Registration process. Only 1 UFA Costs project application is permitted and can only be submitted by the Collaborative Applicant.
- CoC Planning Project Listing – Only 1 CoC planning project is permitted per CoC and can only be submitted by the Collaborative Applicant.
- HUD-2991, Certification of Consistency with the Consolidated Plan – Collaborative Applicants must attach an accurately completed, signed, and dated HUD-2991.

Things to Remember:

- All new and renewal projects must be approved and ranked or rejected on the Project Listings.
- Collaborative Applicants are responsible for ensuring all project applications are accurately appearing on the Project Listings and there are no project applications missing from one or more Project Listings.
- If a project application(s) is rejected by the CoC, the Collaborative Applicant must notify the affected project applicant(s) no later than 15 days before the CoC Program Competition application deadline outside of e-snaps and include the reason for rejection.
- For each project application rejected by the CoC the Collaborative Applicant must select the reason for the rejection from the dropdown provided.
- If the Collaborative Applicant needs to amend a project application for any reason after ranking has been completed, the ranking of other projects will not be affected; however, the Collaborative Applicant MUST ensure the amended project is returned to the applicable Project Listing AND re-rank the project application BEFORE submitting the CoC Priority Listing to HUD in e-snaps.

Additional training resources are available online on the CoC Training page of the HUD Exchange at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/
1A. Continuum of Care (CoC) Identification

Instructions:
The fields on this screen are read only and reference the information entered during the CoC Registration process. Updates cannot be made at this time. If the information on this screen is not correct, contact the HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/ask-a-question/.

Collaborative Applicant Name: Alameda County
2. Reallocation

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

2-1. Is the CoC reallocating funds from one or more eligible renewal grant(s) that will expire in calendar year 2019 into one or more new projects?

Yes
3. Reallocation - Grant(s) Eliminated

CoCs that are reallocating eligible renewal project funds to create a new project application – as detailed in the FY 2018 CoC Program Competition NOFA – may do so by eliminating one or more expiring eligible renewal projects. CoCs that are eliminating eligible renewal projects entirely must identify those projects on this form.

<table>
<thead>
<tr>
<th>Eliminated Project Name</th>
<th>Grant Number Eliminated</th>
<th>Component Type</th>
<th>Annual Renewal Amount</th>
<th>Type of Reallocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Fast Support...</td>
<td>CA0096L9T021710</td>
<td>TH</td>
<td>$1,865,289</td>
<td>Regular</td>
</tr>
<tr>
<td>Bridget Transition...</td>
<td>CA0090L9021710</td>
<td>TH</td>
<td>$70,289</td>
<td>Regular</td>
</tr>
<tr>
<td>North County Women...</td>
<td>CA0105L9T021710</td>
<td>TH</td>
<td>$390,535</td>
<td>Regular</td>
</tr>
</tbody>
</table>
3. Reallocation - Grant(s) Eliminated Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

* 3-1. Complete each of the fields below for each eligible renewal grant that is being eliminated during the FY 2017 reallocation process. Collaborative Applicants should refer to the final HUD-approved FY 2017 Grant Inventory Worksheet to ensure all information entered on this form is accurate.

   Eliminated Project Name: Housing Fast Support Network
   Grant Number of Eliminated Project: CA0096L9T021710
   Eliminated Project Component Type: TH
   Eliminated Project Annual Renewal Amount: $1,864,465

   3-2. Describe how the CoC determined that this project should be eliminated and include the date the project applicant was notified. (limit 750 characters)
   
   Agency elected to reallocate this project
Eliminated Project Component Type: TH
Eliminated Project Annual Renewal Amount: $70,289

3-2. Describe how the CoC determined that this project should be eliminated and include the date the project applicant was notified.
(limit 750 characters)
Agency elected not to renew project

3. Reallocation - Grant(s) Eliminated Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

* 3-1. Complete each of the fields below for each eligible renewal grant that is being eliminated during the FY 2017 reallocation process. Collaborative Applicants should refer to the final HUD-approved FY 2017 Grant Inventory Worksheet to ensure all information entered on this form is accurate.

Eliminated Project Name: North County Women’s Center
Grant Number of Eliminated Project: CA0105L9T021710
Eliminated Project Component Type: TH
Eliminated Project Annual Renewal Amount: $390,535

3-2. Describe how the CoC determined that this project should be eliminated and include the date the project applicant was notified.
(limit 750 characters)
Agency elected not to renew project
4. Reallocation - Grant(s) Reduced

CoCs that are reallocating eligible renewal project funds to create a new project application – as detailed in the FY 2018 CoC Program Competition NOFA – may do so by reducing one or more expiring eligible renewal projects. CoCs that are reducing eligible renewal projects entirely must identify those projects on this form.

<table>
<thead>
<tr>
<th>Reduced Project Name</th>
<th>Reduced Grant Number</th>
<th>Annual Renewal Amount</th>
<th>Amount Retained</th>
<th>Amount available for new project</th>
<th>Reallocation Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>North County Home...</td>
<td>CA1465L9T021702</td>
<td>$1,340,466</td>
<td>$940,466</td>
<td>$400,000</td>
<td>Regular</td>
</tr>
<tr>
<td>Alameda County Sh...</td>
<td>CA0084L9T021710</td>
<td>$1,657,388</td>
<td>$1,313,084</td>
<td>$344,304</td>
<td>Regular</td>
</tr>
<tr>
<td>Alameda County Sh...</td>
<td>CA0747L9T021709</td>
<td>$794,964</td>
<td>$627,108</td>
<td>$167,856</td>
<td>Regular</td>
</tr>
<tr>
<td>Alameda County Sh...</td>
<td>CA1151L9T021706</td>
<td>$487,069</td>
<td>$383,689</td>
<td>$103,380</td>
<td>Regular</td>
</tr>
<tr>
<td>Lorenzo Creek SHP</td>
<td>CA0102L9T021710</td>
<td>$85,788</td>
<td>$77,369</td>
<td>$8,419</td>
<td>Regular</td>
</tr>
<tr>
<td>Alameda County Sh...</td>
<td>CA0085L9T021710</td>
<td>$6,806,807</td>
<td>$6,746,471</td>
<td>$60,336</td>
<td>Regular</td>
</tr>
<tr>
<td>Regent Street</td>
<td>CA0111L9T021709</td>
<td>$82,552</td>
<td>$68,552</td>
<td>$14,000</td>
<td>Regular</td>
</tr>
<tr>
<td>Peter Babcock House</td>
<td>CA0109L9T021710</td>
<td>$45,245</td>
<td>$28,321</td>
<td>$16,924</td>
<td>Regular</td>
</tr>
</tbody>
</table>

Amount Available for New Project (Sum of All Reduced Projects) $1,115,219
4. Reallocation - Grant(s) Reduced Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: North County Homeless Youth Rapid Rehousing
Grant Number of Reduced Project: CA1465L9T021702
Reduced Project Current Annual Renewal Amount: $1,340,466
Amount Retained for Project: $940,466
Amount available for New Project(s): $400,000
(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction. (limit 750 characters)
Agency elected to reallocate project.

4. Reallocation - Grant(s) Reduced Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.
Reduced Project Name: Alameda County Shelter Plus Care - SRA
Grant Number of Reduced Project: CA0084L9T021710
Reduced Project Current Annual Renewal Amount: $1,657,388
Amount Retained for Project: $1,313,084
Amount available for New Project(s): $344,304
(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction. (limit 750 characters)

The CoC reduced these projects to reduce underspending and communicated the reduction to the projects on 8/30/2018.

4. Reallocation - Grant(s) Reduced Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Alameda County Shelter Plus Care - SRO
Grant Number of Reduced Project: CA0747L9T021709
Reduced Project Current Annual Renewal Amount: $794,964
Amount Retained for Project: $627,108
Amount available for New Project(s): $167,856
(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced
and include the date the project applicant was notified of the reduction. (limit 750 characters)

The CoC reduced these projects to reduce underspending and communicated the reduction to the projects on 8/30/2018.

4. Reallocation - Grant(s) Reduced Details

Instructions:

For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Alameda County Shelter Plus Care - HOPE Housing
Grant Number of Reduced Project: CA1151L9T021706
Reduced Project Current Annual Renewal Amount: $487,069
Amount Retained for Project: $383,689
Amount available for New Project(s): $103,380
(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction. (limit 750 characters)

The CoC reduced these projects to reduce underspending and communicated the reduction to the projects on 8/30/2018.

4. Reallocation - Grant(s) Reduced Details

Instructions:
4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

**Reduced Project Name:** Lorenzo Creek SHP  
**Grant Number of Reduced Project:** CA0102L9T021710  
**Reduced Project Current Annual Renewal Amount:** $85,788  
**Amount Retained for Project:** $77,369  
**Amount available for New Project(s):** $8,419  
(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction. (limit 750 characters)

The CoC reduced these projects to reduce underspending and communicated the reduction to the projects on 8/30/2018.

**4. Reallocation - Grant(s) Reduced Details**

**Instructions:**  
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

**Reduced Project Name:** Alameda County Shelter Plus Care - TRA  
**Grant Number of Reduced Project:** CA0085L9T021710  
**Reduced Project Current Annual Renewal Amount:** $6,806,807

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*Project Priority List FY2018 Page 11  09/14/2018*
Amount:

- Amount Retained for Project: $6,746,471
- Amount available for New Project(s): $60,336

(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction.

The CoC reduced these projects to reduce underspending and communicated the reduction to the projects on 8/30/2018.

4. Reallocation - Grant(s) Reduced Details

Instructions:

For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

- Reduced Project Name: Regent Street
- Grant Number of Reduced Project: CA0111L9T021709
- Reduced Project Current Annual Renewal Amount: $82,552
- Amount Retained for Project: $68,552
- Amount available for New Project(s): $14,000

(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction.

Agency elected to reallocate grant.
4. Reallocation - Grant(s) Reduced Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

4-1. Complete the fields below for each eligible renewal grant that is being reduced during the FY 2018 reallocation process. Collaborative Applicants should refer to the FY 2018 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Peter Babcock House
Grant Number of Reduced Project: CA0109L9T021710
Reduced Project Current Annual Renewal Amount: $45,245
Amount Retained for Project: $28,321
Amount available for New Project(s): $16,924
(This amount will auto-calculate by selecting "Save" button)

4-2. Describe how the CoC determined that this project should be reduced and include the date the project applicant was notified of the reduction. (limit 750 characters)
Agency elected to reallocate project
5. Reallocation - New Project(s)

Collaborative Applicants must complete each field on this form that identifies the new project(s) the CoC created through the reallocation process.

Sum of All New Reallocated Project Requests
(Must be less than or equal to total amount(s) eliminated and/or reduced)

$3,440,508

<table>
<thead>
<tr>
<th>Current Priority #</th>
<th>New Project Name</th>
<th>Component Type</th>
<th>Transferred Amount</th>
<th>Reallocation Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>28</td>
<td>Housing Fast...</td>
<td>Joint TH &amp; P...</td>
<td>$1,864,465</td>
<td>Regular</td>
</tr>
<tr>
<td>27</td>
<td>The Grand TH...</td>
<td>Joint TH &amp; P...</td>
<td>$584,000</td>
<td>Regular</td>
</tr>
<tr>
<td>7</td>
<td>Peter Babcoc...</td>
<td>PH</td>
<td>$61,626</td>
<td>Regular</td>
</tr>
<tr>
<td>3</td>
<td>COACH Expansion</td>
<td>PH</td>
<td>$930,417</td>
<td>Regular</td>
</tr>
</tbody>
</table>
5. Reallocation - New Project(s) Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

5-1. Complete each of the fields below for each new project created through reallocation in the FY 2018 CoC Program Competition. For list of all eligible types of new projects that may be created through the reallocation process, see the FY 2018 CoC Program Competition NOFA.

FY 2018 Rank (from Project Listing): 28
Proposed New Project Name: Housing Fast Support Network TH/RRH
Component Type: Joint TH & PH-RRH
Amount Requested for New Project: $1,864,465

5. Reallocation - New Project(s) Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

5-1. Complete each of the fields below for each new project created through reallocation in the FY 2018 CoC Program Competition. For list of all eligible types of new projects that may be created through the reallocation process, see the FY 2018 CoC Program Competition NOFA.

FY 2018 Rank (from Project Listing): 27
Proposed New Project Name: The Grand TH/RRH
Component Type: Joint TH & PH-RRH
Amount Requested for New Project: $584,000
5. Reallocation - New Project(s) Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

5-1. Complete each of the fields below for each new project created through reallocation in the FY 2018 CoC Program Competition. For list of all eligible types of new projects that may be created through the reallocation process, see the FY 2018 CoC Program Competition NOFA.

FY 2018 Rank (from Project Listing): 7
   Proposed New Project Name: Peter Babcock - Redwood Hills
   Component Type: PH
   Amount Requested for New Project: $61,626

5. Reallocation - New Project(s) Details

Instructions:
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

5-1. Complete each of the fields below for each new project created through reallocation in the FY 2018 CoC Program Competition. For list of all eligible types of new projects that may be created through the reallocation process, see the FY 2018 CoC Program Competition NOFA.

FY 2018 Rank (from Project Listing): 3
   Proposed New Project Name: COACH Expansion
   Component Type: PH
   Amount Requested for New Project: $930,417
6. Reallocation: Balance Summary

Instructions
For guidance on completing this form, please reference the FY 2018 CoC Priority Listing Detailed Instructions. Submit technical question to the e-snaps HUD Exchange Ask A Question (AAQ) at https://www.hudexchange.info/get-assistance/.

6-1 Below is a summary of the information entered on the eliminated and reduced reallocation forms. The last field on this form, “Remaining Reallocation Balance” should equal zero. If there is a positive balance remaining, this means the amount of funds being eliminated or reduced are greater than the amount of funds request for the new reallocated project(s). If there is a negative balance remaining, this means that more funds are being requested for the new reallocated project(s) than have been reduced or eliminated from other eligible renewal projects.

Reallocation Chart: Reallocation Balance Summary

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reallocated funds available for new project(s):</td>
<td>$3,440,508</td>
</tr>
<tr>
<td>Amount requested for new project(s):</td>
<td>$3,440,508</td>
</tr>
<tr>
<td>Remaining Reallocation Balance:</td>
<td>$0</td>
</tr>
</tbody>
</table>
Continuum of Care (CoC) New Project Listing

Instructions:
Prior to starting the New Project Listing, Collaborative Applicants should carefully review the “CoC Priority Listing Detailed Instructions” and the “CoC Project Listing Instructional Guide”, both of which are available at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources.

To upload all new project applications that have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of new projects submitted that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the New Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon. The Collaborative Applicant has the sole responsibility for ensuring all amended projects are resubmitted and appear on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

| Project Name         | Date Submitted | Comp Type | Applicant Name            | Budget Amount | Grant Term | Rank | PH/Realloc | PSH/RRH | Expans | |
|----------------------|----------------|-----------|---------------------------|---------------|------------|------|------------|---------|--------|
| The Grand TH/RRH    | 2018-09-06 14:12:... | Joint TH & PH-RRH | City of Oakland           | $584,000      | 1 Year     | 27   | Reallocation  |         |        |
| Housing Fast Supp...| 2018-09-06 14:27:... | Joint TH & PH-RRH | City of Oakland           | $1,864,465   | 1 Year     | 28   | Reallocation  |         |        |
| Alameda County Do... | 2018-09-07 16:11:... | SSO       | Cornerstone Commu...       | $160,137      | 1 Year     | 47   |             |         |        |
| Peter Babcock Hou... | 2018-09-10 18:00:... | PH        | Satellite Afforda...       | $61,626       | 1 Year     | 7    | PH Bonus      | PSH     | Yes    |
| Welcome Home Exp...  | 2018-09-14 15:22:... | PH        | Alameda County Ho...       | $600,000      | 1 Year     | 48   | Reallocation  | PSH     |        |
| Bridget House TH...  | 2018-09-14 16:02:... | Joint TH & PH-RRH | Women's Daytime D...      | $70,289       | 1 Year     | 51   | Reallocation  |         |        |
| COACH Project Exp... | 2018-09-14 17:06:... | PH        | City of Berkeley          | $1,498,032    | 1 Year     | 3    | PH Bonus      | PSH     | Yes    |
Continuum of Care (CoC) Renewal Project Listing

Instructions:
Prior to starting the New Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Detailed Instructions" and the "CoC Project Listing Instructional Guide", both of which are available at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources.

To upload all renewal project applications that have been submitted to this Renewal Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of renewal projects that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the Renewal Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon. The Collaborative Applicant has the sole responsibility for ensuring all amended projects are resubmitted and appear on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

The Collaborative Applicant certifies that there is a demonstrated need for all renewal permanent supportive housing and rapid re-housing projects listed on the Renewal Project Listing.

The Collaborative Applicant does not have any renewal permanent supportive housing or rapid re-housing renewal projects.

Duplicate Rank present in this list.

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Date Submitted</th>
<th>Grant Term</th>
<th>Applicant Name</th>
<th>Budget Amount</th>
<th>Rank</th>
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</table>
Continuum of Care (CoC) Planning Project Listing

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To upload the CoC planning project application that has been submitted to this CoC Planning Project Listing, click on the "Update List" button. This process may take a few minutes as the project will need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review the CoC Planning Project Listing, click on the magnifying glass next to view the project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

Only one CoC Planning project application can be submitted by a Collaborative Applicant and must match the Collaborative Applicant information on the CoC Applicant Profile. Any additional CoC Planning project applications must be rejected.

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Date Submitted</th>
<th>Grant Term</th>
<th>Applicant Name</th>
<th>Budget Amount</th>
<th>Comp Type</th>
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**Funding Summary**

**Instructions**
For additional information, carefully review the "CoC Priority Listing Detailed Instructions" and the "CoC Priority Listing Instructional Guide", both of which are available at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources.

This page contains the total budget summaries for each of the project listings for which the Collaborative Applicant approved and ranked or rejected project applications. The Collaborative Applicant must review this page to ensure the totals for each of the categories is accurate. The "Total CoC Request" indicates the total funding request amount the Collaborative Applicant will submit to HUD for funding consideration. As stated previously, only 1 UFA Cost project application (for UFA designated Collaborative Applicants only) and only 1 CoC Planning project application can be submitted and only the Collaborative Applicant designated by the CoC is eligible to request these funds.

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## Attachments

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Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:
Submission Summary

WARNING: The FY2017 CoC Consolidated Application requires 2 submissions. Both this Project Priority Listing AND the CoC Consolidated Application MUST be submitted.

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<td>4. Grant(s) Reduced</td>
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<td>7B. CoC Renewal Project Listing</td>
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### 7D. CoC Planning Project Listing

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**Notes:**

Ranks must be unique

2B Project Renewal List must have at least one of the checkboxes selected.

7D. CoC Planning Project Listing list contains 1 incomplete item.
Summary Assessment of Racial Disparity in Alameda County: Housing Crisis Response System Access and Permanent Housing Outcomes

Comparing the general and homeless populations of Alameda County demonstrates the racial disparities that are apparent throughout the United States. African Americans appear at a 78% higher rate in the homeless population than in the general population. American Indians and Alaska Natives also evidence a 66% higher rate of homelessness, as compared with their representation in the general population. By contrast, Asians appear in Alameda County’s homeless population at a 135% lower rate than in its general population. And, Whites comprise a 50% smaller proportion of the homeless population than in the general population.

Ethnic disparities in Alameda County are slightly different from national trends. Whereas the 2017 Annual Homeless Assessment Report to Congress, Part 1 showed Hispanic/Latino identified persons represented at higher rates in the homeless population than in the general population, Alameda County’s 2017 Point In Time Count shows that Hispanic/Latinos make up a 35% smaller proportion of the homeless population than in the general population of Alameda County.

Given the disparities that are visible in the above comparisons and building upon research findings from the National Alliance to End Homelessness, the US Interagency Council on Homelessness, and the Center for Social Innovation, Alameda County must do more to address racial and ethnic disparities. As a beginning place, the continuum of care is looking closely for racial and ethnic disparities in access to the housing crisis response system and permanent housing outcomes.

In Alameda County some populations show levels of access and permanent housing outcomes that are consistent with their proportion in the homeless population. American Indian or Alaskan Natives, Asians, and Native Hawaiian or Other Pacific Islanders show equivalent rates in the population, access, and permanent housing outcome rates. By contrast, people who identify as being multi-racial represent 15% of the homeless population, 8% of the housing crisis response system, and 10% of the permanent housing exits.

African Americans have slightly higher rates of access and positive housing outcomes, making up 49% of the homeless population, 54% of the people accessing the housing crisis response system, and 58% of the total exits to permanent housing. Whites have slightly lower rates of access and positive housing outcomes, making up 30%
of the homeless population, 27% of the people accessing the housing crisis response system, and 23% of the total exists to permanent housing. As the differences are all within 5% points of each other, it does not appear at this point that people of different races or ethnicities are more, or less likely to receive homeless assistance or a positive outcome.

Hispanic/Latinos and non-Hispanic/Latino groups receive access and positive outcomes that are generally consistent with their proportion in the homeless population. As compared with their proportion in the homeless population, system access is very slightly lower among Hispanic/Latino identified clients and permanent housing outcomes are slightly higher. Non-Hispanic/Non-Latino identified clients show rates of access and permanent housing outcomes that are generally consistent with their proportion in the homeless population.

In the coming year the EveryOne Home Results Based Accountability (RBA) Committee will undertake a deeper analysis aimed at deepening our understanding of the impact of racial and ethnic disparities both within and outside the housing crisis response system. Activities will include analyzing the prioritization tool for patterned differences in vulnerability across racial and ethnic groups, exploring patterns of program use across racial and ethnic groups, interviews and focus groups with consumers, reviewing data quality, and sharing system data with partners and other stakeholders. These activities will generate qualitative and quantitative data that will enable the continuum of care to understand and respond to racial and ethnic inequalities.

In the coming year the CoC will redouble its efforts to ensure that the CoC board, EveryOne Home Leadership Board, and seated committees represent the racial and ethnic distribution of the homeless population in Alameda County. As well, we aim to increase representation of homeless and formerly homeless consumers in our governance structure. Lastly, we have plans to make critical materials available in multiple languages, including but not limited to information about coordinated entry, the consent to participate in HMIS, and the assessment tool.
Coordinated Entry Access Packet

Instructions: Fill out this access packet for One Adult in Each Household seeking services. If there are multiple adults in a household, choose one adult to complete the access packet as the head of household. The head of household should be the adult with the most barriers to obtaining and maintaining housing, such as the longest history of homelessness or greatest medical need. Or, each adult can access the housing crisis response system independently as separate households. It is up to the clients.

Ask each question as written, in order, and mark the response. Some questions include prompts or additional clarifications you can say if a question is unclear.

Notes and directions for staff appear in italics.
Questions and answer options for the client appear in regular type.

Notes and directions for data entry staff appear in shaded text boxes

The workflow through the access packet will depend on whether the household is literally homeless or not literally homeless. The workflows are as follows:

Not Literally Homeless Households
1. Safety Screening
2. Housing Crisis Screening
3. Housing Problem Solving
4. Referrals

Literally Homeless Households
1. Safety Screening
2. Housing Crisis Screening
3. Housing Problem Solving
4. Referrals
5. Option to complete the Assessment immediately or schedule an appointment with an HRC
6. Release of Information
7. Client Profile
8. Assessment

When complete, return the entire packet to the appropriate person at your agency for data entry and secure storage.

Introduction to Client Household: Hi! My name is FIRST NAME. Can you share your first name with me?

The Alameda County housing crisis response system is shifting to a new way of connecting people to available housing and support. Everything I’m going to ask will help with knowing what supports we may be able to offer. Some of the questions are personal. You don’t have to answer anything that makes you uncomfortable, but you should know that not answering questions may make it harder to connect you and your household with support.

For most people it takes 30 minutes to go through these questions. It’s best if we can get through them today, but we can come back to them later if needed. Answering the questions will also help us figure out some referrals to immediate support.

If it’s okay with you, let’s get started.
SAFETY SCREENING

1. Are you in immediate danger now or do you need immediate medical attention?  
   ____ No  ____ Yes (call 911)

2. Are you currently fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking?  
   ____ No  ____ Yes

2a. If No to 2, continue to the housing crisis screening.

2b. If Yes to 2 ask, Are you interested in services specifically for victims of domestic violence?

- A domestic violence or sexual assault service provider can help you arrange a safe shelter and other specialized things you might need, like a safety plan.
- The housing crisis response system can connect you with non-domestic violence related housing support.

Household choice:

☐ Victim of domestic violence interested in accessing services via a Domestic Violence Hotline.
   Connect the household to a DV hotline. Stop.
   - A Safe Place crisis line 510-536-7233
   - Building Futures with Women and Children 1-866-292-9688
   - Ruby’s Place 888-339-7233
   - Tri-Valley Haven 1-800-884-8119
   - Next Door Solutions 408-279-2962
   - Family Violence Law Center Mobile Response Team 1-800-947-8301
   - National Domestic Violence Hotline 1-800-799-7233

☐ Victim of domestic violence interested in accessing services via the Housing Crisis Response System.
   Households that are actively fleeing a domestic violence situation are considered literally homeless. Skip the housing crisis screening. Proceed to housing problem solving.
**HOUSING CRISIS SCREENING**

3. What kind of place did you sleep or stay last night?
   - [ ] Homeless Situation, (LITERALLY HOMELESS) such as:
     - Place not meant for habitation like the street, outside, in a tent, in a car/van/RV, in an abandoned building, on a bus or BART, etc.
     - Emergency Shelter, including a hotel or motel paid for with an emergency shelter voucher
     - Interim Housing
     - Fleeing domestic violence
   - [ ] Institutional Housing Situation, such as:
     - Psychiatric hospital or other psychiatric facility
     - Substance abuse treatment facility or detox center
     - Hospital or other residential non-psychiatric medical facility
     - Jail, prison, or juvenile detention facility
     - Foster care home or foster care group home
     - Long term care facility or nursing home
   - [ ] AND Has the household been staying in this kind of place less than 90 days?
   - [ ] AND Was the household staying on the streets or in a shelter prior to this stay? (LITERALLY HOMELESS)
   - [ ] Temporary Housing Situation, such as:
     - Hotel or motel paid for without emergency shelter voucher
     - Staying or living temporarily in a FRIEND’s or FAMILY MEMBER’s room, apartment, or house
   - [ ] AND Has the household been staying in this kind of place less than 7 days?
   - [ ] AND Was the household staying on the streets or in a shelter prior to this stay? (LITERALLY HOMELESS)
   - [ ] Transitional and Permanent Housing Situations, such as:
     - Owned by client, no ongoing housing subsidy
     - Transitional housing for homeless (including homeless youth)
     - Residential project or halfway house with no homeless criteria.
     - Permanent housing (other than RRH) for formerly homeless persons*
     - Rental by client, with VASH subsidy*
     - Rental by client, with GPD TIP (transition-in-place) subsidy*
     - Rental by client with other housing subsidy (Including RRH) *
     - Owned by client, with ongoing housing subsidy
     - Rental by client, no ongoing subsidy
     - Living with friends or family on a permanent or long-term basis
   - [ ] AND Has the household been staying in this kind of place less than 7 days?
   - [ ] AND Was the household staying on the streets or in a shelter prior to this stay? (LITERALLY HOMELESS)

**Staff Use Only:**

Is the household literally homeless? ___No ___Yes

To be literally homeless the household must meet one of the below criteria:

- Did the household stay in a homeless situation last night (see answer to question 3)?
- Is the household exiting an institution where they have stayed for 90 days or less and did they reside in an emergency shelter or place not meant for human habitation immediately before entering that institution (all 3 Institutional Setting boxes)?

**What is the final disposition of the housing crisis screening?**

- [ ] Not literally homeless (continue to housing problem solving and referral)
- [ ] Literally homeless (continue to housing problem solving, referral, and assessment)
HOUSING PROBLEM SOLVING

What is happening with your housing situation?

Engage in active listening. Repeat and reflect back what is being said to clarify and ensure understanding.

Possible exploratory questions:
- What have you already tried to help with this situation?
- Who is in your support system? Could these people help you resolve your housing situation and what would it take?
- Do you have a social worker, advocate, case manager, or someone else who is working with you? Do they know about what’s happening?

What do you think would help to resolve your housing crisis?

Based on what you’ve said, would information about [affordable housing, eviction prevention, legal, financial assistance, relocation, etc.] resources would helpful? Check all referrals provided

Information About Affordable Housing

☐ Bay Area Community Services Housing Education and Counseling Workshops: M-F around Alameda County, call 510-613-0330 for more information or visit bayareacsc.org
☐ Eden I&R’s affordable housing list: call 2-1-1
☐ AIDS Housing Information Project, M-F 9am-4pm through 510-537-2600 or 877-424-3746

Eviction Prevention

☐ Bay Area Legal Aid’s Tenant Rights Line: leave a message at 1-888-382-3405
☐ Catholic Charities Housing Clinics, 2nd and 4th Tuesday of the month from 9-11:30AM @ 433 Jefferson St. in Oakland, call 510-768-3100 for more information
☐ Causa Justa/Just Cause: 510-TENANTS/ 510-836-2687 @ 3022 International Blvd Suite 205, Oakland
☐ Centro Legal de la Raza: 510-437-1554 or visit centrolegal.org
☐ East Bay Community Law Center: 510-548-4040 or visit info@ebclc.org
☐ ECHO Housing: 510-581-9380 or toll free 855-ASK-ECHO
☐ Eviction Defense Center: (510) 452-4541 or visit www.evictiondefensecenteroakland.org
☐ Tenants Together Tenant Rights Hotline: 1-888-495-8020

Financial Assistance

☐ Catholic Charities Housing and Financial Services Center: 510-768-3100 @ 433 Jefferson St, Oakland
☐ ECHO Housing: 510-581-9380 or toll free 855-ASK-ECHO
☐ Eden I&R: call 2-1-1
☐ Neighborhood Law Corps: 510-238-6628 (utility shut-off help)
☐ Season of Sharing: 510-272-3700
☐ Utility Assistance, REACH: 1-800-933-9677 or HEAP: 510-881-0300

Legal (including, but not limited to, clean slate and credit repair services)

☐ Bay Area Legal Aid’s Legal Advice Line: 1-800-551-5554
☐ East Bay Community Law Center: 510-548-4040 or info@ebclc.org
☐ Housing and Economic Rights Advocates (HERA): 510-271-8443
☐ Neighborhood Law Corps: 510-238-6628

Information and Referral to Other Services:

☐ Eden I&R information and referral service: call 2-1-1

Veteran Specific Services

☐ VA Homeless Triage 510-453-8478; M-F 8am-4pm @ 525 21st St Oakland (shower, laundry, referrals, connections to VA housing)
☐ Swords to Plowshares 510-844-7500 @ 2719 Telegraph Ave, Oakland (legal, employment, housing, prevention assistance)
☐ VA Drop-In Housing Resource Group Wednesday 11:30am-12:30pm @ 39199 Liberty St. Fremont
☐ VA Drop-In Housing Resource Group Mon 10am-11am @ 4951 Arroyo Rd, Bldg. 62 Room 505, Livermore

Other:

Stop for Not Literally Homeless households.
Coordinated Entry Access Packet: Screening and Housing Problem Solving

Literally Homeless Households:

There may be additional housing and support resources (like shelter, transitional housing, or housing navigation) available to you. Alameda County is using an assessment to prioritize and match people to resources as they become available. Would you like to do the assessment now? Or, I can help you connect with a housing resource center, and they can do the assessment.

Assigning a Resource Zone:
In what part of the Bay Area do you spend most of your time? Or, what city do you identify as "home?"

| ☐ Alameda = Mid County | ☐ Emeryville = North County Adults or North County Families | ☐ Piedmont = Oakland Adults or North County Families |
| ☐ Albany = North County Adults or North County Families | ☐ Fremont = South County | ☐ Pleasanton = East County |
| ☐ Berkeley = North County Adults or North County Families | ☐ Hayward = Mid-County | ☐ San Leandro = Mid-County |
| ☐ Castro Valley = Mid County | ☐ Livermore = East County | ☐ San Lorenzo = Mid-County |
| ☐ Dublin = East County | ☐ Newark = South County | ☐ Sunol = South County |
| ☐ Oakland = Oakland Adults or North County Families | ☐ Union City = South County |

How are you/your household connected there?
☐ Family
☐ Job
☐ School
☐ Sleep/stay
☐ Support service programs
☐ Support system
☐ Other: ________________________________

Based on where you usually stay, it sounds like you should be connected with and HRC in [insert appropriate resource zone]. Your HRC is [Use following list of HRCs by resource zone to assign an HRC. When there are multiple HRCs in a zone, the client can choose the HRC that they'd prefer to access.]

For households willing to schedule an appointment with the HRC: Call the HRC with the household and schedule the appointment together, provide HRC contact information to the household so they can remain in touch (reverse of this page). If they lose the contact info or can't remember, the household can call 211. Stop.

For households wishing to do the assessment now, assign the HRC and provide contact information to the household so that they can remain in touch (reverse of this page). If they lose the contact info or can't remember, the household can call 211. Proceed to the ROI.
Coordinated Entry Access Packet: Screening and Housing Problem Solving

East County:
- Abode Services Tri-Valley Housing Resource Center (all households)
  - Call 2-1-1

Oakland
- Bay Area Community Services (BACS) Downtown Oakland Housing Resource Center (adults)
  - Call 2-1-1
  - Walk in hours M-W 12-3 @ 559 16th St. Oakland, CA 94612
- East Oakland Community Project (EOCP) East Oakland Housing Resource Center (adults)
  - Call 2-1-1
  - Walk in ours Th and F 12-3 @ 7515 International Blvd, Oakland CA 94621
- Family Front Door (families)
  - Call 2-1-1

North County
- Berkeley Food and Housing North County Housing Resource Center (adults)
  - Call 2-1-1
- Family Front Door (families)
  - Call 2-1-1

Mid County
- Abode Services Mid County East Housing Resource Center (all households)
  - Call 2-1-1
- Building Futures with Women and Children (BFWC), Mid County West Housing Resource Center (all households)
  - Call 2-1-1

South County
- Abode Services Tri-City Housing Resource Center (all households)
  - Call 2-1-1
What is InHOUSE and Why Should I Use It?

InHOUSE is a database system used to
- Coordinate efforts to help you obtain and maintain permanent housing
- Secure files electronically
- Ensure these projects continue receiving funding to keep them open
- Reduce the information you have to repeat and answer at multiple agencies

The InHOUSE system is used by many agencies throughout the county that provide services to homeless and low-income persons. A current list of participating health, housing, and human service agencies that provide housing-related supports is available at (acgov.org/cda/hcd/documents/roi_providers.pdf). InHOUSE data is used to assess your needs, track and improve services provided, and to match you to helpful resources based on priorities and standards established by the Alameda County HUD Continuum of Care (viewable at everyonehome.org).

When you request or receive services from a program participating in the Alameda County Continuum of Care, information collected about your household is entered into the InHOUSE system.

What information is shared about me?

My name, social security number, alias, date of birth, gender, race, ethnicity, veteran status, education, employment, if I have a disability, household relationships, living situation, income amount(s) and type, benefit(s) information, if I have health coverage and type, assessments, services needed and provided, and outcomes of services provided, including the name of the projects where I received services. Other information that might be collected (dependent on program) include income, non-cash benefits, health insurance, physical disability, developmental disability, chronic health condition, HIV/AIDS status, mental health, substance abuse, domestic violence, sexual orientation, etc. Additional information may include sharing of my photo and previously collected InHOUSE data.
Who can view and share information about me?

Information shared about me will ONLY be viewable by the participating agencies listed at [acgov.org/cda/hcd/documents/roi_providers.pdf](http://acgov.org/cda/hcd/documents/roi_providers.pdf). Each person or agency with access rights to the InHOUSE system must sign an agreement to maintain the security and confidentiality of client records.

Funders, cities, and other housing-related planning groups require InHOUSE to provide reports, which enable them to better understand the people-served, services provided and outcomes achieved. InHOUSE helps by pooling your data with others for these reports. This supports continued funding and improvement of services and housing projects for you and other homeless and low-income households. In addition, InHOUSE data is used for research purposes (including coordination with other systems of care), analysis about programs, specific service types, targeting of services, understanding best practices and improvements needed, or other uses to enhance the homeless and housing service delivery system. Keeping your information within the InHOUSE system helps us pool your data with others for these reports.

You have the right to receive a copy of all information collected about you and shared between the participating agencies. You may also amend and correct information collected about you that may be incorrect.
Client Name (Print): ____________________________________________________________

Accompanying children: ______________________________________________________
(under the age of 18)

__________________________________________________________________________

______________ I have received and reviewed the “What is InHOUSE and Why Should I Use It”
information sheet.

(Initial Here)

Consent to share and view my data:

By signing below, I agree that program intake/exit and service information collected about me and
my household can be shared among InHOUSE participating agencies for the purposes of
helping me to obtain and maintain permanent housing.

• I understand that a regularly updated list of the agencies participating in InHOUSE is
available at (acgov.org/cda/hcd/documents/roi_providers.pdf).
• I know that the agencies participating in the system (listed at
acgov.org/cda/hcd/documents/roi_providers.pdf) must follow strict privacy laws regarding
protection of electronic and paper records.
• I understand that this acknowledgement is valid for ten (10) years from the date that I sign
this form.
• I understand that my name, date of birth, gender and Social Security Number are used to
identify my record in the database.
• I understand that my photo may be shared in the system.
• I understand that my services and project data will be used in reporting and in research or
analysis about programs, specific service types, targeting of services, or other uses to
improve the homeless and housing service delivery system.

Signature of Client    Date    Agency Representative  Date

Agency Representative Printed Name
RELEASE OF INFORMATION (ROI)

☐ Client received data privacy and security notice and opted into the HMIS by signing the Release of Information.

Start Date: Reference the ROI form for start date
End Date: 10 years after start date
Documentation Type:
Location: With what agency is the signed document on file?

Keep the signed ROI with this form. Continue to the client profile.

☐ Client declined to share information and did not sign Release of Information (ROI). STOP. Be sure to complete housing problem solving, provide referrals, and reiterate that the household can reach out to 211 to get assessed at a later date.

CLIENT PROFILE

What is your Social Security Number? _____-____-_____

☐ Full SSN Reported ☐ Approximate or Partial SSN Reported ☐ Client Doesn’t Know ☐ Client Refused

What is your full name?
First: ___________________________________________ Middle: ___________________________________________ Last: ___________________________________________

Suffix: ___________ Alias: ___________________________________________

☐ Full Name Reported ☐ Partial, Street, or Code Name ☐ Client Doesn’t Know ☐ Client Refused

What is your Date of Birth? _____/____/____

☐ Full DOB Reported ☐ Approximate or Partial DOB Reported ☐ Client Doesn’t Know ☐ Client Refused

How do you describe or identify your gender?

☐ Female ☐ Trans Female (MTF or Male to Female) ☐ Male ☐ Trans Male (FTM or Female to Male)

☐ Gender Non-Conforming (doesn’t identify as female, male, or transgender) ☐ Client Doesn’t Know ☐ Client Refused

How do you describe or identify your sexual orientation?

☐ Heterosexual/Straight ☐ Lesbian ☐ Bisexual

☐ Gay ☐ Questioning/unsure ☐ Client Doesn’t Know ☐ Client Refused

What race do you identify with? You can identify more than one. Please select all that apply:

☐ American Indian or Alaskan Native ☐ Asian ☐ Black or African American

☐ Native Hawaiian or Other Pacific Islander ☐ White ☐ Client Doesn’t Know ☐ Client Refused

What is your ethnicity? Do you identify as Hispanic or Latino?

☐ Hispanic/Latino ☐ Non-Hispanic/Non-Latino ☐ Client Doesn’t Know ☐ Client Refused

Have you served on, or completed a call to, active duty in the Armed Forces of the United States?

☐ Yes ☐ No (skip additional veteran questions) ☐ Client Doesn’t Know (skip additional veteran questions) ☐ Client Refused (skip additional veteran questions)
If yes, a veteran: There are some resources that are only for veterans, so I have a few additional questions to help determine if you may be eligible for these veteran resources.

- What year did you enter military service? 
- What year did you leave military service? 
- In what theater of Operations did you serve? 
  - World War II 
  - Korean War 
  - Vietnam War 
  - Persian Gulf War 
  - Afghanistan 
  - Iraq (Iraqi Freedom) 
  - Iraq (New Dawn) 
  - Other Operations 
  - Client Doesn’t Know 
  - Refused 
- In what branch of the military did you serve? 
  - Army 
  - Air Force 
  - Navy 
  - Marines 
  - Coast Guard 
  - Client Doesn’t Know 
  - Refused 
- What is your discharge status? 
  - Honorable 
  - General under honorable conditions 
  - Other Than Honorable (OTH) 
  - Bad Conduct 
  - Dishonorable 
  - Uncharacterized 
  - Client Doesn’t Know 
  - Refused 

Where was the last permanent housing where you lived for 90 days or more?
- Alameda 
- Albany 
- Berkeley 
- Castro Valley 
- Dublin 
- Emeryville 
- Fremont 
- Hayward 
- Livermore 
- Newark 
- Oakland 
- Piedmont 
- Pleasanton 
- San Leandro 
- San Lorenzo 
- Sunol 
- Union City 
- Other Unincorporated Alameda County 
- Contra Costa County 
- Marin County 
- San Francisco 
- San Mateo County 
- Santa Clara County 
- Another California County 
- Another State 
- Another Country

Where did you go to high school (if applicable)?
- Alameda 
- Albany 
- Berkeley 
- Castro Valley 
- Dublin 
- Emeryville 
- Fremont 
- Hayward 
- Livermore 
- Newark 
- Oakland 
- Piedmont 
- Pleasanton 
- San Leandro 
- San Lorenzo 
- Sunol 
- Union City 
- Other Unincorporated Alameda County 
- Contra Costa County 
- Marin County 
- San Francisco 
- San Mateo County 
- Santa Clara County 
- Another California County 
- Another State 
- Another Country

Where were you born?
- Alameda 
- Albany 
- Berkeley 
- Castro Valley 
- Dublin 
- Emeryville 
- Fremont 
- Hayward 
- Livermore 
- Newark 
- Oakland 
- Piedmont 
- Pleasanton 
- San Leandro 
- San Lorenzo 
- Sunol 
- Union City 
- Other Unincorporated Alameda County 
- Contra Costa County 
- Marin County 
- San Francisco 
- San Mateo County 
- Santa Clara County 
- Another California County 
- Another State 
- Another Country
Coordinated Entry Access Packet: Release of Information and Client Profile

What is/are the best way(s) to contact you? Prompt: We want to be able to reach you when something useful becomes available for you.

Do you have a physical address? Prompt: where do you sleep or spend your time?

☐ Yes. Provide physical address below  ☐ No. Move on to mailing address

<table>
<thead>
<tr>
<th>Physical Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street/Apartment</td>
</tr>
<tr>
<td>City</td>
</tr>
<tr>
<td>State</td>
</tr>
<tr>
<td>ZipCode</td>
</tr>
</tbody>
</table>

Do you have a mailing address?

☐ Yes  ☐ No. Move on to phone information

<table>
<thead>
<tr>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, is your mailing address the same as the physical address?</td>
</tr>
<tr>
<td>☐ Yes. Move on to phone information  ☐ No Provide mailing address below</td>
</tr>
<tr>
<td>Street/Apartment</td>
</tr>
<tr>
<td>City</td>
</tr>
<tr>
<td>State</td>
</tr>
<tr>
<td>ZipCode</td>
</tr>
</tbody>
</table>

Phone, Primary: ____________________________

Phone, Alternate: __________________________

Email, Primary: ____________________________

Email, Alternate: __________________________

Notes:

(End of Client Profile)
Coordinated Entry Access Packet: Assessment

Date: __ __ / __ __ / __ __  Staff Name: ________________________________

Agency: ________________________________

Setting: ☐ Housing Education Workshop ☐ HRC Walk-in ☐ Outreach ☐ Other in Person Setting

Please assign the resource zone by referencing the household configuration (Adults only or Families with minor children) and where the household spends most of their time. Answer the below question by referencing the housing crisis screening on page 5 or verbally verifying with the head of household.

In what part of the Bay Area do you spend most of your time? Or, what city do you identify as “home?”

☐ Alameda = Mid County  ☐ Emeryville = North County Adults or North County Families  ☐ Piedmont = Oakland Adults or North County Families

☐ Albany = North County Adults or North County Families  ☐ Fremont = South County  ☐ Pleasanton = East County

☐ Berkeley = North County Adults or North County Families  ☐ Hayward = Mid-County  ☐ San Leandro = Mid-County

☐ Castro Valley = Mid County  ☐ Livermore = East County  ☐ San Lorenzo = Mid-County

☐ Dublin = East County  ☐ Newark = South County  ☐ Sunol = South County

☐ Oakland = Oakland Adults or North County Families  ☐ Union City = South County

Zone Assignment: ☐ North County Adults (Adults from Albany, Berkeley, Emeryville)

☐ Oakland Adults (Adults from Oakland, Piedmont)

☐ North County Families (Families with minor children from Albany, Berkeley, Emeryville, Oakland, Piedmont)

☐ Mid County Adults and Families (All households from Alameda, Ashland, Castro Valley, Cherryland, Hayward, San Leandro, San Lorenzo)

☐ East County Adults and Families (All households from Dublin, Livermore, Pleasanton, and surrounding unincorporated areas)

☐ South County Adults and Families (All households from Fremont, Newark, Sunol, Union City, and surrounding unincorporated areas)
Living Situation
What kind of place did you sleep or stay last night?

☐ Homeless Situation, such as:
- Place not meant for habitation like the street, outside, in a tent, in a car/van/RV, in an abandoned building, on a bus or BART, etc.
- Emergency Shelter, including a hotel or motel paid for with an emergency shelter voucher
- Interim Housing
- Fleeing domestic violence

☐ Institutional Housing Situation, such as:
- Psychiatric hospital or other psychiatric facility
- Substance abuse treatment facility or detox center
- Hospital or other residential non-psychiatric medical facility
- Jail, prison, or juvenile detention facility
- Foster care home or foster care group home
- Long term care facility or nursing home

☐ And, has the household been staying in this kind of place less than 90 days?
☐ And, was the household staying on the streets or in a shelter prior to this stay?

☐ Temporary Housing Situation, such as:
- Hotel or motel paid for without emergency shelter voucher
- Staying or living temporarily in a FRIEND’S or FAMILY MEMBER’s room, apartment, or house

☐ And, has the household been living in this kind of place for less than 7 days?
☐ And, was the household staying on the streets or in a shelter prior to this stay?

☐ Permanent Housing Situation, such as:
- Owned by client, no ongoing housing subsidy
- Residential project or halfway house with no homeless criteria.
- Transitional housing for homeless (including homeless youth)
- Permanent housing (other than RRH) for formerly homeless persons*
- Rental by client, with VASH subsidy*
- Rental by client, with GPD TIP (transition-in-place) subsidy*
- Rental by client with other housing subsidy (Including RRH) *
- Owned by client, with ongoing housing subsidy
- Rental by client, no ongoing subsidy
- Living with friends or family

☐ And, has the household been living in this kind of place for less than 7 days?
☐ And, was the household staying on the streets or in a shelter prior to this stay?

How long have you been sleeping or staying in this kind of place (i.e. the emergency shelter or place not meant for human habitation listed directly above)?

<table>
<thead>
<tr>
<th>☐ One night or less</th>
<th>☐ Two to six nights</th>
<th>☐ One week or more, but less than one month</th>
<th>☐ One month or more, but less than 90 days</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 90 days or more, but less than one year</td>
<td>☐ One year or more, but less than 2 years</td>
<td>☐ Two years or more, but less than 5 years</td>
<td>☐ Five years or more, but less than 10 years</td>
</tr>
<tr>
<td>☐ Ten years or more</td>
<td>☐ Client Doesn’t Know</td>
<td>☐ Client Refused</td>
<td></td>
</tr>
</tbody>
</table>

Approximate date homelessness started: When did you become homeless this time? When did you start staying in a shelter or a place not meant for people to sleep? If not previously homeless but will be tonight, use today’s date. Approximate date is okay.

___/___/____
Times Homeless in the Past Three Years: Over the past three years, how many separate times have you been homeless in an Emergency Shelter or a place not meant for people to sleep, including today?

<table>
<thead>
<tr>
<th></th>
<th>One time</th>
<th>Two times</th>
<th>Three times</th>
<th>Four or more times</th>
<th>Client Doesn’t Know</th>
<th>Client Refused</th>
</tr>
</thead>
</table>

Total Months Homeless in the Past Three Years: Over the past three years, what is the total number of months you have been homeless in an Emergency Shelter, on the street, in a vehicle, or in another place not meant for people to sleep, including today?

<table>
<thead>
<tr>
<th></th>
<th>One month (this time is first month)</th>
<th>2 months</th>
<th>3 months</th>
<th>4 months</th>
<th>5 months</th>
<th>6 months</th>
<th>7 months</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 months</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
<tr>
<td>9 months</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
<tr>
<td>10 months</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
<tr>
<td>11 months</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
<tr>
<td>12 months</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
<tr>
<td>More than 12 months</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
<tr>
<td>Client Refused</td>
<td>One month (this time is first month)</td>
<td>2 months</td>
<td>3 months</td>
<td>4 months</td>
<td>5 months</td>
<td>6 months</td>
<td>7 months</td>
</tr>
</tbody>
</table>

Over your whole life, how long have you lived in an emergency shelter or place not meant for people to sleep?

<table>
<thead>
<tr>
<th></th>
<th>One night or less</th>
<th>Two to six nights</th>
<th>One week or more, but less than one month</th>
<th>Between 30 and 90 days</th>
</tr>
</thead>
<tbody>
<tr>
<td>90 days or more, but less than one year</td>
<td>One night or less</td>
<td>Two to six nights</td>
<td>One week or more, but less than one month</td>
<td>Between 30 and 90 days</td>
</tr>
<tr>
<td>Ten years or more</td>
<td>One night or less</td>
<td>Two to six nights</td>
<td>One week or more, but less than one month</td>
<td>Between 30 and 90 days</td>
</tr>
</tbody>
</table>

When was the last time you or any adult in your household had a lease on an apartment (or owned a property) that was in your name? Answer this question for the adult who had a lease the longest time ago.

<table>
<thead>
<tr>
<th></th>
<th>Now/Currently</th>
<th>One year ago, or less</th>
<th>1 to 5 years ago</th>
<th>More than 5 years ago</th>
<th>Never</th>
</tr>
</thead>
</table>

Have you or any adult in your household left housing due to a legal eviction or foreclosure notice in the last 5 years? I'm talking about a situation in which you/they were legally forced to leave by a court order. Answer this question for the adult with the most legal evictions/foreclosures in the past 5 years.

<table>
<thead>
<tr>
<th></th>
<th>0 / Never</th>
<th>1 to 2 times</th>
<th>3 or more times</th>
</tr>
</thead>
</table>

Continued on next page.
Household Information
Please indicate the total number of persons in your household for whom you are seeing assistance for right now. By household, I mean the people you are planning to live with and are seeking assistance for right now. __________

Please list the names and date of birth of all household members and their relationship to you.

<table>
<thead>
<tr>
<th>Name</th>
<th>Date of Birth/ Age</th>
<th>Relationship (Spouse, child, etc.)</th>
</tr>
</thead>
</table>

True for any of the household members, including the head of household
☐ Age 2 years or younger
☐ Age 3-5 years
☐ Age 62 or older
☐ Head of Household age 18-24 years

Pregnancy Status: Are you or anyone in your household currently pregnant?
☐ Yes ☐ No ☐ Client Doesn’t Know ☐ Client Refused

Formerly a Ward of Child Welfare or Foster Care Agency: Have you or anyone in your household aged out of foster care?
☐ Yes ☐ No ☐ Client Doesn’t Know ☐ Client Refused

Housing Barriers
These next questions are things a property manager might ask about or find out about as they consider you for housing. Please answer these questions as honestly as you can. Having these kinds of things in your past will not prevent you from getting assistance from us and knowing about them will help us work with you to address these housing challenges.

In the past five years, have you or another adult in your household been arrested by the police?
Answer this question for the adult with the most arrests in the past five years.
☐ 0 / Never ☐ 1 to 3 times ☐ 4 or more times

Have you or another adult in your household ever been convicted of any of the following offenses? (May select more than one)

<table>
<thead>
<tr>
<th>Arson ☐ Yes ☐ No</th>
<th>Methamphetamine production ☐ Yes ☐ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>A sexual offense that requires you to register with law enforcement ☐ Yes ☐ No</td>
<td>A crime that led to an eviction or loss of your housing ☐ Yes ☐ No If yes, please specify:</td>
</tr>
<tr>
<td>☐ No, none of these</td>
<td>☐ Client Doesn’t Know ☐ Client Refused</td>
</tr>
</tbody>
</table>
Income and Benefits
What is your household’s monthly income? ____________________________

Use the annualized household income to identify the corresponding Area Median Income (AMI)

Health Information
How many times have you or any other adult in your household been hospitalized or used health care crisis services (like an emergency room, ambulance, psychiatric emergency services, suicide prevention hotline, detox program) in the past 30 days? Answer this question for the adult with the most hospitalizations/highest use of health care crisis services.

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ 0 / None</td>
<td>□ 1 time</td>
<td>□ 2 times</td>
<td>□ 3-5 times</td>
<td>□ 6 or more times</td>
</tr>
<tr>
<td>□ Client Doesn’t Know</td>
<td>□ Client Refused</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do any of the following specific conditions apply to you? Mark all that apply.

□ Physical disability
□ Chronic health condition(s) such as, but not limited to, heart disease, severe asthma, diabetes, traumatic brain injury, post-traumatic stress syndrome, dementia, severe headache/migraine, cancer, chronic bronchitis, etc.
□ Psychiatric/Mental health conditions such as depression or schizophrenia
□ Excessive use or dependency on alcohol
□ Use of illegal drugs or prescriptions not written for them
□ Both alcohol and drugs
□ Developmental disability
□ HIV/AIDS

Do any of the following specific conditions apply to any other household members? Mark all that apply.

<table>
<thead>
<tr>
<th>Household Member’s Name</th>
<th>Condition (check all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Physical Disability</td>
<td></td>
</tr>
<tr>
<td>□ Chronic health condition(s)</td>
<td></td>
</tr>
<tr>
<td>□ Psychiatric/Mental Health such as depression or schizophrenia</td>
<td></td>
</tr>
<tr>
<td>□ Excessive use or dependency on alcohol</td>
<td></td>
</tr>
<tr>
<td>□ Use of illegal drugs or prescriptions not written for them</td>
<td></td>
</tr>
<tr>
<td>□ Both alcohol and drugs</td>
<td></td>
</tr>
<tr>
<td>□ Developmental Disability</td>
<td></td>
</tr>
<tr>
<td>□ HIV/AIDS</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Household Member’s Name</th>
<th>Condition (check all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Physical Disability</td>
<td></td>
</tr>
<tr>
<td>□ Chronic health condition(s)</td>
<td></td>
</tr>
<tr>
<td>□ Psychiatric/Mental Health such as depression or schizophrenia</td>
<td></td>
</tr>
<tr>
<td>□ Excessive use or dependency on alcohol</td>
<td></td>
</tr>
<tr>
<td>□ Use of illegal drugs or prescriptions not written for them</td>
<td></td>
</tr>
<tr>
<td>□ Both alcohol and drugs</td>
<td></td>
</tr>
<tr>
<td>□ Developmental Disability</td>
<td></td>
</tr>
<tr>
<td>□ HIV/AIDS</td>
<td></td>
</tr>
</tbody>
</table>
When you last had any type of housing, have you or another adult in your household experienced difficulties with things like shopping, preparing food, using public or other forms of transportation, taking medications, or handling your money and paying bills?

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

Have you or anyone in your household been told by a medical provider that you have a life-threatening illness that requires you to have stable shelter before you can obtain the treatment you need? For example, people that need oxygen, chemotherapy/radiation treatment, regular insulin injections, organ transplants, etc.

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

**Violence and Risk**

We are almost done. These next questions are about things that have happened to you or members of your household.

In the past 30 days, have you or another member of your household had to do things that felt unsafe to survive?

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

If yes, how frequently did you or another member of your household do things that felt unsafe to survive?

☐ 0 / None  ☐ Daily  ☐ Once a week  ☐ Two or three times a month

☐ Once  ☐ Client Doesn’t Know  ☐ Client Refused

Have you or any other adult in your household ever become homeless because you ran away from your family home, a group home, or a foster home?

☐ Yes  ☐ No  ☐ Client Doesn’t Know  ☐ Client Refused

**Current Resources Assessment**

Currently, do you and/or members of your household receive any of the below? Check the resources the household currently receives. Would you be interested in seeing if you qualify for these types of income and support?

Income Sources:

☐ Earned income (i.e. employment, job
☐ Supplemental Security Income (SS)
☐ Retirement Income from Social Security
☐ VA Non-Service Connected Disability Pension
☐ VA Service Connected Disability Pension
☐ Temporary Assistance for Needy Families (TANF)
☐ Private disability insurance
☐ Child Support
☐ Unemployment Insurance
☐ Social Security Disability Insurance (SSDI)
☐ Workers Compensation
☐ General Assistance
☐ Pension/Retirement income from a former job
☐ Alimony or other spousal support
☐ Other
(resource assessment continues, next page)

Non-Cash Benefits:

☐ Supplemental Nutrition Assistance Program (SNAP), CalFresh, Food Stamps, EBT
☐ TANF Child Care Services
☐ TANF Transportation Services
☐ Special Supplemental Nutrition Assistance Program for Women, infants, and Children (WIC)
☐ Other TANF Services
☐ Other

Health Insurance:

☐ MEDICAID/MediCal
☐ MEDICARE
☐ State Children’s Health Insurance (SCHIP)
☐ VA Medical Services
☐ Employer-Provided Health Insurance
☐ Health Insurance obtained through COBRA
☐ Private Pay Health Insurance
☐ State Health Insurance for Adults
☐ Indian Health Services Program
☐ Other:

Let’s think together about the personal strengths, connections, and positive supports that you have in your life, and how they could help you get back into permanent housing with support from our program or other programs.

We have completed the coordinated entry assessment. Let’s talk now about staying in touch and next steps.

As you know there are very few affordable housing resources available and many people in need. I do not know at this point if your household will be prioritized for housing support, or when support may become available. If you are matched to housing support, you will be contacted using the information you provided. Please stay in touch and let us know if anything changes in your life, either positive or negative, that may impact your housing situation. Here is the contact information for:

HRC: ________________________________

Outreach Worker: ________________________________

Before we go, are there any other resources or services I can connect you to?
Referrals Provided (Check ALL that APPLY)

- Community Mental Health
- Employment Assistance
- Health Insurance
- Identification Documents
- Income Assistance
- Non-Cash Benefits (Cal-Fresh, Cal-Works Childcare, Cal-Works Transportation, WIC, etc.)
- Primary Health/Dental Care
- Substance Use Treatment
- Applicant declined referral/acceptance.
- Applicant terminated assessment prior to completion.

- Other/Specify: ___________________________
EveryOne Home INSTRUCTIONS and EVALUATION FORM for
2018 CoC RENEWAL LOCAL APPLICATION PACKAGE SUBMISSIONS

2018 CoC Renewal Local Application Instructions

2018 Local Renewal Process
EveryOne Home (EOH), Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting renewing CoC projects anticipating CoC-funds in 2018 to participate in the Local Application Package – Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its NOFA Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD NOFA is released

For further information on this Process, please refer to EveryOne Home’s 2018 Local Renewal and New Projects Review Process available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.

The United States Department of Housing and Urban Development (HUD) requires that all Project applications included in the CoC Consolidated Application be rated and ranked by the local Continuum of Care (CoC) including renewal projects, and proposed new reallocation, bonus, and Domestic Violence (DV) Bonus projects proposed. Without a Local Application, Projects cannot be scored or ranked and cannot be included in the final application package.

Previously, Renewal Project applications and Newly Proposed Project applications were combined into a single project application. As of 2018, EOH will be returning to two separate applications for renewing and new projects. **These Local Application Instructions and Evaluation Form are for Renewal Projects only. Newly proposed projects are asked to complete a New Projects Local Application available for download on the EveryOne Home website at** http://everyonehome.org/our-work/hud-coc-nofa/ and should not make any submissions using this form.

New this year, EveryOne Home Staff scored Renewal Projects’ objective criteria (previously scored during the Local Application competition) during the Project Evaluation of Objective Criteria. **Preliminary scores resulting from the Project Evaluation of Objective Criteria (worth up to 79 points) were released to projects on Monday, April 30, 2018 via email.**

Renewal Project Local Applications will be scored on a 21-point scale in five categories:

1. Narrative for Housing First (scored by NOFA Committee) = Up to 4 points
2. Spending = Up to 5 points
3. Cost Effectiveness = Up to 2 points
4. Narrative for Quality Assurance (scored by NOFA Committee) = Up to 7 points
5. **NEW:** Consolidation of existing renewals = 3 points
Scores to be awarded to renewal projects during the Local Application (up to 21 points possible) are cumulative with preliminary scores awarded to the Project Evaluation Package (up to 79 points) for a total of 100 points possible.

Renewal Projects may also increase Project Evaluation Preliminary scores under the following four Sections:
1. Documentation for Housing First = Up to 6 points
2. Documentation for Client Eligibility = Up to 5 points
3. Performance Outcomes = Up to 32 points
4. Fiscal Management = Up to 2 points

All Renewal Projects will be invited to submit additional or updated Housing First documents (to reflect Housing First compliance) and may increase points for this section.

All Renewal Projects that scored less than full points for certain objective criteria during the Project Evaluation may attach an Annual Performance Report (APR) or equivalent report from a more recent period than the Project Evaluation Package and may increase points under each section, as applicable.

All projects seeking to potentially increase Project Evaluation Preliminary scores must attach documentation as required on Page 6 of this Application.

In addition, all Projects will be responding to an additional question, that will not be scored in 2018, consistent with HUD requirements for the Competitive application:
1. Community and Client Engagement, including describing Projects
   - Relationships and/or MOU with schools or projects to meet children’s educational needs (for family/youth projects only)
   - Whether project offers volunteer/work opportunities to clients/tenants or links them with vocational programs

New in 2018, Eligible renewal projects will have the ability to consolidate two or more projects (up to four) in one project application – without having to wait for a grant amendment to be executed to consolidate two or more grants. Applicant must consult first with HUD Field Office on whether the Project is eligible for consolidation and provide proof when submitting Local Application package. Projects with outstanding audits or findings, obligation to HUD in arrears, history of poor financial management/drawdowns, or low-occupancy and/or capacity will not be allowed to consolidate. Eligible renewals will receive 3 additional points for applying to consolidate their existing grants.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Monday, September 3, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.

Projects renewing for the first time that are not yet under contract, which were not in operation for a full twelve months since October 1, 2016, or Projects with a start date later than October 1, 2016 and a full year of Project data have previously been provided the opportunity to elect to receive the score awarded when they applied as a
new project or submit a full application during the Project Evaluation Package. Projects that previously chose to keep their prior score do not need to make any submissions at this time.

New Joint TH and PH-RRH have previously been provided the opportunity to elect to receive the score awarded when they applied as a new project or submit a full application during the Project Evaluation Package stage. New Joint TH and PH-RRH that chose to keep their prior score do not need to make any submissions at this time.

Project types that must submit the attached Renewal Local Application Form:
- Renewing Permanent Supportive Housing (PSH),
- Renewing Transitional Housing (TH) (both youth-serving and general-use), and
- Renewing Rapid Rehousing (RRH) projects that serve homeless individuals and families, including unaccompanied youth;


**Total Funding Available:**
- Total Annual Renewal Demand (ARD) = $34,329,783
- Tier 1 Amount (94% ARD) = $32,269,996
- ARD in Tier 2 (6%) = $2,059,787
- Bonus = $2,059,787
- Total Tier 2 (6% + Bonus) = $4,119,574
- DV Bonus = $1,062,887
- CoC Planning Grant = $1,029,893
- 2018 Total Submission allowed = $37,452,457 (does not include CoC Planning Grant)

Alameda County’s approved Annual Renewal Demand (ARD) = $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in bonus new projects and up to three (3) additional Domestic Violence (DV) Bonus projects funded by the 2018 new DV Bonus. The application package to HUD will also include a CoC Planning Grant, requested only by the Collaborative Applicant for CoC-related activities, which is not ranked competitively and does not affect the amount available to projects.

The total funds requested from Alameda County that are competitively scored cannot exceed the combined amounts of the ARD, bonus, and DV Bonus funds, which is currently = $37,452,457.

HUD continues to require CoCs to rank their projects in two tiers, Tier 1 and 2. Tier 2 projects are at risk of not getting funded and must compete against all other Tier 2 projects nationally. For 2018, Tier 1 is 94% of the CoCs FY 2018 Annual Renewal Demand. Tier 2 is the 6% difference between Tier 1 and the CoC’s ARD, plus any amount for the bonus. HUD will fund Tier 2 projects after it has made funding awards to all Tier 1 projects nationally. Projects will be scored on a 100-point scale based on the following:

a. **CoC Score:** Up to 50 points in direct proportion to the score received on the CoC Application rounded to the nearest whole point. Based on last year’s CoC score of 157.25, our Tier 2 projects would have received 39 points out of 50.
b. CoC Project Ranking: Up to 40 points for the CoCs ranking of the project. See page 16 of the NOFA for a detailed description of the formula.

c. Up to 10 points for commitment to applying the Housing First model.

**Eligible Renewal Projects:**
Applicants for Renewal Projects must be listed as the current grant recipient on the CoC’s 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the Grant Inventory Worksheet (GIW), please contact Riley Wilkerson at Riley.Wilkerson@acgov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant.

**Projects that are not planning on renewing their CoC funding:**
Projects who find mainstream funders to cover project costs with resources that are a better fit, or that determine they are unlikely to receive the minimum score in the Local Competition may elect not to submit an eligible project for renewal. Projects eligible to be renewed, but not planning on renewing CoC funding in the 2018 NOFA competition should have reported it to EveryOne Home before April 26, 2018. If you have missed this deadline and would like to withdraw your project from consideration, please notify EveryOne Home via email at info@everyonehome.org by August 17, 2018 to certify the projects’ withdrawal in writing.

The funds for projects not electing to renew will be added to the pool of available funds for reallocation to new projects. **The decision not to renew is permanent.** Once eliminated from the package, the same project cannot reapply in subsequent years. Only **new** projects created by reallocated funds or bonus funds can get added to our package in future application rounds.

**Voluntary reductions of grants:** Projects that have consistently underspent funds may wish to consider reducing their renewal amounts. Page 1 of the application has a space to indicate if the amount requested is less than the amount indicated on the GIW and by how much. Projects cannot request more than what is listed on the GIW.

**Submission Requirements:**
All project types must submit their Local Application via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed Local Application Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the Applicant and Project names.

The Local Application Package will be released on **Friday, July 20, 2018.** A complete submitted Package will contain: 1) a complete Local Application Form and; 2) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are **required** to be attached for Projects to receive full points on a related section of the application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

**Coordinated Entry Threshold Requirements:**
All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred
from Coordinated Entry. All 2018 NOFA Local competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required for participation.

**Required Documentation for Local Application** (see Checklist under Local Application Form, Page 1):

1. **Local Application Form**
   i. A completed Local Application Form
2. **NEW Consolidation**
   i. Projects applying for Consolidation must attach written approval by HUD that projects are eligible for Consolidation.
3. **NEW Community and Client Engagement:** Serving the Educational Needs of children and youth (Projects serving households with children and youth only):
   i. Projects written policies, formal agreements, MOUs or partnerships with local school(s), youth education providers, early childhood providers, Head Start or other educational services to meet the educational needs of children and youth.

**Required Documentation for the Project Evaluation Resubmission** (see Checklist under Project Evaluation Resubmission Form, Page 6):

1. **HMIS-Based Reports:**
   i. Annual Performance Report (or equivalent report for non-HMIS providers) from date range: 10/1/2017 – Present (as applicable)
2. **Housing First Documents:**
   i. Updated or revised Resident Selection Criteria and Housing Applications; Project Participant Agreements; House Rules; Lease and sub-Leases; and/or additional Housing First documents as discussed in Housing First TA sessions (as applicable)
3. **Client Eligibility:**
   i. Updated or revised Project Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, Vet, etc.), or written procedures for verifying eligibility (as applicable)
4. **Grant and Fiscal Management:**
   i. For Audits with findings, a formal documented response by the Agency and/or funder on how they have addressed the deficiency (as applicable)

The scoring tool at the back of this application details how projects earn points in each category. The application form and the scoring tool are tightly linked. As you prepare the application, the scoring chart at the end of this Local Application can be detached and used alongside many of the sections to self-score.

**Project Scoring and Ranking:**
Projects must score a minimum of 60 points to be assured inclusion in the application package. Projects scoring below that threshold will be reallocated. Applicants are strongly encouraged to review the Local Application, and to self-score their project on the performance indicators as soon as possible to determine if they will meet the minimum score. If in self-scoring the project does not appear to meet threshold, please contact info@everyonehome.org.

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objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that may be considered include:

- the geographic and population diversity of the projects included;
- the projected impact of the loss of any residential buildings on homeless people;
- the expiration date and amount of the grant.

Download a Word version of this application from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on Page i. Multiple PDFs for agencies with large files for backup are acceptable.

For questions regarding the completion of the Local Application, please contact EveryOne Home at info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on August 2, 2018. Questions received will be responded to in writing individually and posted to the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/ in two batches on July 31, 2018 and August 3, 2018.

**Appeals Process**

The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) **What can be appealed:** An application that
   - a. Was not evaluated according to the published local NOFA process **AND/OR**
   - b. Evaluated in a way that violates federal regulations **AND**
   - c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked **OR** whether an Applicant project is included in the package at all. **Note:** this includes any Project who meet Appeals Criteria #a and/or #b, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) **What is not eligible for appeal:**
   - a. Errors or omissions by project Applicants
   - b. Projects that do not meet threshold
   - c. Dissatisfaction with Project’s scores
   - d. Need for funds
   - e. Appeals submitted after stated deadline


All project applications received by the deadline will be reviewed and applicants will be notified by Friday, August 31, 2018 of their score, their initial ranking, and whether they are being included in the Consolidated Application. Ranking is subject to change according to appeals (if any) and the final ranking will be released September 14, 2018.

**2018 NOFA Timeline Highlights:**
- Project Evaluation Package Preliminary scores released to Projects – April 30, 2018
- Local Application released – July 20, 2018
- FAQ period begins – July 20, 2018
- FAQ period ends – August 2, 2018
- Local Application due back to EveryOne Home – August 17, 2018
- Preliminary Rating & Ranking List scores released to Projects - August 31, 2018
- Appeals Period begins - September 5, 2018
- Appeals Period ends – September 7, 2018
- Final Rating & Ranking List released to Projects - September 14, 2018
EveryOne Home INSTRUCTIONS and EVALUATION FORM for
2018 CoC NEW PROJECTS LOCAL APPLICATION PACKAGE SUBMISSIONS

2018 CoC New Projects Local Application Instructions

2018 New Projects Review Process
EveryOne Home, Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting projects anticipating CoC-funds to participate in the 2018 New Projects Local Application - Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its Local Application into three Stages:
   o Stage 1 - Renewals’ Project Evaluation of Objective Criteria
   o Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
   o Stage 3 - Local Application for New and Renewal Projects after HUD CoC NOFA is released

For further information on this Process, please refer to the EveryOne Home’s 2018 Local Renewal and New Projects Review Process (available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/).

The United States Department of Housing and Urban Development (HUD) requires that all local project applications included in the CoC Consolidated Application be rated and ranked, including renewal projects, and proposed new projects created with reallocation, bonus, and Domestic Violence Bonus funds. Without a local application, projects cannot be scored or ranked and cannot be included in the final application package submitted to HUD.

Previously, Renewal Project applications and New Projects applications were combined into a single project application. As of 2018, EveryOne Home will be returning to two separate applications for renewing and new projects. These Local Application Instructions and Evaluation Form are for New Projects only.

Total Funding Available:
Total Annual Renewal Demand (ARD) = $34,329,783
Tier 1 Amount (94% ARD) = $32,269,996
ARD in Tier 2 (6%) = $2,059,787
Bonus = $2,059,787
Total Tier 2 (6% + Bonus) = $4,119,574
DV Bonus = $1,062,887
CoC Planning Grant = $1,029,893
2018 Total Submission allowed = $37,452,457 (does not include CoC Planning Grant)

Alameda County’s 2018 approved Annual Renewal Demand (ARD) is $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in Bonus funds for one or more eligible project components. New in 2018, our CoC may apply for up to $1,062,887 for up to three (3) Domestic Violence Bonus projects (DV Bonus) to provide housing and services to survivors of domestic violence, dating violence, human trafficking and stalking. The application package will also include a CoC Planning Grant of up to $1,029,893. The CoC Planning grant, requested only by the Collaborative Applicant for CoC-related activities, is not ranked competitively and does not affect the amount available to projects.
The total funds requested from Alameda County that are competitively scored (excluding the CoC Planning Grant) cannot exceed the combined amounts of the ARD and the Bonus and DV funds, which is equals $37,452,457.

Project types eligible for New Projects Local Application

- **New** Permanent Supportive Housing (PSH) where 100% of the beds are dedicated to serve chronically homeless individuals, households with children, including unaccompanied youth and/or Projects designated as DedicatedPLUS (DDP)
- **New** Rapid Rehousing (RRH) for individuals and families, including unaccompanied youth
- **New** Joint Transitional Housing and Permanent Housing and Rapid Rehousing component (Joint TH and PH-RRH)
- **New** Homeless Management Information System Project
- **New** Support Services Only for Coordinated Entry to develop or operate a Centralized or Coordinated Assessment System (SSO-CE)
- **For New Domestic Violence Bonus Projects** to provide housing and services to domestic violence, dating violence, stalking and trafficking survivors:
  - **New** Rapid Rehousing (RRH)
  - **New** Joint Transitional Housing and Permanent Housing and Rapid Rehousing component (Joint TH and PH-RRH) to better serve individuals and families, including individuals and families fleeing or attempting to flee DV, dating violence, sexual assault, stalking and trafficking.
  - **New** Supportive Services Only for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, human trafficking, or stalking (i.e., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers).

Eligible Applicants

To apply for a new project, Applicants must be a non-profit or entity of local government that operates a:

1. **CoC funded Renewal Project** listed as the current grant recipients on the CoC’s 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the GIW, please contact Riley Wilkerson at Riley.Wilkerson@acgov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant; or

2. **Non-CoC funded existing Projects** seeking to expand existing operations for eligible new project types (PH-PSH; PH-RRH; Joint TH and PH-RRH) or to provide a new DV Bonus project under eligible new DV Bonus project types (PH-RRH, Joint TH and PH-RRH, and SSO Projects for Coordinated Entry to implement policies, procedures, and practices for Coordinated Entry (CE) to better meet the need of survivors of DV, dating violence, sexual assault, or stalking. **Project applicants cannot use CoC program funds to replace state and local funds.**

   a. **Non CoC funded Projects** must demonstrate capacity and appropriate qualifications, including prior experience managing projects and performing activities like those proposed in the application, prior performance on relevant grants, and experience in utilizing government funds. For DV Bonus Projects, Applicants must demonstrate experience in serving survivors of domestic violence, dating violence, sexual assault, stalking, and trafficking, and ability to house survivors and meet safety outcomes. For those applying for SSO Projects for Coordinated Entry.
Applicants must also demonstrate prior experience providing services to DV survivors and expertise in policy and training in the fields of domestic violence, sexual assault and/or trafficking.

New Projects Creation:
Applicants may apply for new projects through:

A. Reallocation and Bonus for Conversion/Expansion of current operations:
The CoC welcomes voluntary reallocation of HUD funds that strengthens our system and application package and is aligned with our guiding principles.

- **Reallocation**: CoC funded renewal projects may apply to reallocate an existing project into a new eligible project type (such as from TH to PH-RRH). The process requires the elimination of the existing renewal.
  - **Transition Grants (new in 2018)**: Applicants seeking to reallocate an existing renewal project may apply as a Transition grant (NOFA, Page 20). Up to 50% of each transition grant may be used for costs of eligible activities of the program component originally funded. Project will have one year to fully transition from the original component to the new component and this will take place during the transition grants normal year and must have the consent of the Continuum of Care (CoC). Projects using Consolidation of existing projects cannot apply for Transition grants (NOFA, Page 1).

- **Bonus**: The CoC is also inviting CoC-funded and non-CoC program funded projects seeking expansion of current operations to apply as new Bonus projects (NOFA, Page 17).
  - **Expansion**: Applicants (CoC funded and non CoC-funded) may submit a new project application to expand current operations to add units, beds, persons served, and services provided to existing participants, or in the case of HMIS, increase the current HMIS grant activities. Non-CoC project applicants may request CoC program funds to add to a current project funded from sources other than CoC funds, except to replace state or local funds.

B. **New Domestic Violence (DV) Bonus Projects (new in 2018)**
HUD added up to $50 million in DV Bonus to provide housing and services to survivors of domestic violence, dating violence, sexual assault and stalking. As stated above, $1,062,887 is available for the CoC to select up to three (3) DV Bonus Projects. The CoC will select and include in its package submission one project application per project type as required by HUD. Applicants can submit a new project application for the following project types:

1. Permanent Housing-Rapid Rehousing (PH-RRH) projects that follow a Housing First approach
2. Joint TH and PH-RRH projects (TH and PH-RRH) that follow a Housing First approach
3. SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, or stalking (e.g., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers).

Applicants may apply to expand an existing CoC funded renewal project not dedicated to DV survivors and dedicate additional units, beds, persons served, or services provided for this population. The DV
Bonus Projects will be ranked on the new Project Listing of the CoC Priority Listing with a unique rank number.

Scoring of New Project Applications
New Project applications will be scored on a 100-point scale in five categories:
1. Primary Activity Type = Up to 5 points
2. How Project Addresses Local and HUD Priorities = Up to 25 points
3. Outcome Performance = Up to 32 points
4. Grant Management = Up to 20 points
5. Organization Capacity = Up to 18 points

In addition, Projects will be responding to an additional question, that will not be scored in 2018:
1. Community and Client Engagement, including describing Projects:
   ▪ Relationships and/or MOU with schools or projects to meet children’s educational needs (for family/youth projects)
   ▪ Whether project offers volunteer/work opportunities to clients/tenants or links them with vocational programs.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Monday, September 3, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website.

Appeals Process
The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) What can be appealed: An application that
   a. Was not evaluated according to the published local NOFA process AND/OR
   b. Evaluated in a way that violates federal regulations AND
   c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all. Note: this includes any Project who meet Appeals Criteria #1 and/or #2, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) What is not eligible for appeal:
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project’s scores
   d. Need for funds
   e. Appeals submitted after stated deadline

Submission Requirements:
All project types must submit their Local Application Package response via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed New Projects Local Application Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the applicant and Project names.

The Local Application Package will be released on Friday, July 20, 2018. A complete submitted Package will contain: 1) A completed Cover Sheet; 2) a complete New Projects Local Application Form; 3) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Projects to receive full points on a related section of the Application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

Coordinated Entry Threshold Requirement
All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred from Coordinated Entry. All 2018 NOFA Local competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required by participation.

Required Documentation (see Checklist under New Projects Local Application Form, Pages 1 through 2):
1. Homeless Management Information System (HMIS) or comparable Reports (Reports should be from October 1, 2016 – September 30, 2017):
   CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.
   a. Applicants proposing new projects can submit up to 2 APRs
      • If expanding an existing CoC funded project to a different population, including DV survivors, the existing project APR and an APR (or appropriate reports from a comparable data base) from a project serving the proposed population must be included.
      • If converting to a different project type, include APR for existing program and an APR (or appropriate reports from a comparable data base) from the program type being proposed
      • If applicant is not an HMIS user, attach appropriate reports from a comparable data base. Contact EveryOne Home via email at info@everyonehome.org if you have questions about which reports in your data base to attach.

2. Housing First Documentation
   CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.
   a. Applicants proposing new projects must submit documentation consistent with Housing First principles (please refer to Appendix B – Housing First Checklist at EveryOne Home’s website at http://everyonehome.org/our-work/hud-coc-nofa/)
      • If proposing to serve a different population that modifies the Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules, the new or proposed housing first documentation must be submitted.
• If converting to a different project type, include existing or proposed housing first documentation, including Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules.

• If applicant not CoC funded, include documentation that shows implementation of housing first principles in a comparable program, including Resident Selection Criteria/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules. Contact EveryOne Home via email at info@everyonehome.org if you have questions about appropriate documents to attach.

3. Client Eligibility:

**CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.**

a. Applicants must submit documentation of client eligibility and verification of eligibility.

   • If proposing to serve a different population that modifies the client eligibility and/or verification of eligibility, documentation must be submitted.

   • If converting to a different project type, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, vet, etc.), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. HOPWA or MHSA require specific disabilities).

   • If applicant not CoC funded, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children; individuals and families fleeing domestic violence), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. Housing for People with AIDS or Mental Health Services Administration) require specific disabilities.

4. Grant and Fiscal Management:

**CoC funded projects do not need to submit documents in this section. Scores from their renewal application will be applied to the expansion or conversion new project.**

a. Reports and Invoicing

   • Applicants not CoC funded must submit proof of meeting report deadlines and invoicing draws on comparable HUD grants or government grants.

b. Audits

   • Applicants not CoC funded must submit most recent annual independent audit with Management Letter or financial statement if audit not required — must be from a fiscal year ending December 31, 2015 or later.

c. Proof of 501c3 non-profit status

   • Applicants not CoC funded must submit proof of 501c3 non-profit status

d. Evidence of Site Control for Direct-Grantee Site-Based projects (Scattered-site PSH & RRH projects are exempt). Required for any proposed projects for which HUD is paying leasing, operating or rehabilitation cost on a building, both residential and service delivery sites. Without evidence of site control for new projects for whom the above is true, the project cannot be included in the package.
5. Qualifications and Experience (Non-CoC funded applicants and DV Bonus projects)
   a. Must provide 1 Letter of Recommendation demonstrating applicant’s capacity and
      experience managing projects and performing activities proposed in the application, and a
      list of applicant’s current government and private grants

   For DV Bonus Projects
   a. For RRH and Joint TH and PH-RRH, must provide 1 Letter of recommendation demonstrating
      experience in serving survivors of domestic violence, dating violence, sexual assault,
      stalking, and trafficking, and ability to house survivors and meet safety outcomes.
   b. For SSO Projects for Coordinated Entry, must provide 1 Letter of Recommendation
      documenting applicant’s experience providing services to DV survivors and expertise in
      policy and/or training in the fields of domestic violence, sexual assault and/or trafficking (for
      SSO Projects for Coordinated Entry)

6. NEW Community and Client Engagement: Serving the Educational Needs of children and youth (new
   projects serving households with children and youth only):
   a. Existing or proposed Applicant’s written policies, formal agreements, MOUs or partnerships with
      local school(s), youth education providers, early childhood providers, Head Start or other
      educational services to meet the educational needs of children and youth.

The scoring tool at the back of the application details how projects earn points in each category. The application
form and the scoring tool are tightly linked. As you prepare the application, the scoring chart at the end of this
local application can be detached and used alongside many of the sections to self-score.

Projects must score a minimum of 60 points to be assured inclusion in the application package. Applicants are
strongly encouraged to review the local application, and to self-score their project on the performance indicators
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to meet threshold, please contact info@everyonehome.org.

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ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other
local objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that
may be considered include:
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- the projected impact of the loss of any residential buildings on homeless people;
- the expiration date and amount of the grant.

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http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a
PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to
submit as described on Page i. Multiple PDFs for agencies with large files for backup are acceptable. Public
entities are welcome to submit their formal audit responses via link in the cover email with relevant page
numbers of findings and letters indicated in their communication.

For questions regarding the completion of the local application, please contact EveryOne Home at
info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on
2018 CoC HMIS Renewal and New HMIS Project Local Application Instructions

2018 Local Renewal Process
EveryOne Home, Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting projects anticipating CoC-funds to participate in the 2018 Local Application for the 2018 Notice of Funding Availability (NOFA), including to respond to the HMIS Renewal and New Project Local Application. In 2018, EveryOne Home divided its Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria (did not include HMIS project)
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD CoC NOFA is released

For further information on this Process, please refer to the EveryOne Home’s 2018 Local Renewal and New Projects Review Process (available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/). The United States Department of Housing and Urban Development (HUD) requires that all local project applications included in the CoC Consolidated Application be rated and ranked, including renewal projects, and proposed new projects created with reallocation, bonus, and Domestic Violence Bonus funds. Without a local application, projects cannot be scored or ranked and cannot be included in the final application package submitted to HUD.

These Local Application Instructions and Evaluation Form are for HMIS Projects only. Non-HMIS New and Renewal Projects should not make any submissions using this form.

Total Funding Available:
Total Annual Renewal Demand (ARD) = $34,329,783
Tier 1 Amount (94% ARD) = $32,269,996
ARD in Tier 2 (6%) = $2,059,787
Bonus = $2,059,787
Total Tier 2 (6% + Bonus) = $4,119,574
DV Bonus = $1,062,887
CoC Planning Grant = $1,029,893
2018 Total Submission allowed = $37,452,457 (does not include CoC Planning Grant)

Alameda County’s 2018 approved Annual Renewal Demand (ARD) is $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in Bonus funds for one or more eligible project components. New in 2018, our CoC may apply for up to $1,062,887 for up to three (3) Domestic Violence Bonus projects (DV Bonus) to provide housing and services to survivors of domestic violence, dating violence, human trafficking and stalking. The application package will also include a CoC Planning Grant of up to $1,029,893. The CoC Planning grant, requested only by the Collaborative Applicant for CoC-related activities, is not ranked competitively and does not affect the amount available to projects.
The total funds requested from Alameda County that are competitively scored (excluding the CoC Planning Grant) cannot exceed the combined amounts of the ARD and the Bonus and DV funds, which is equals $37,452,457.

**New Projects Creation:**
HMIS applicant can apply for a new HMIS project through reallocation or bonus funds. The CoC is inviting CoC-funded projects seeking expansion of current operations to apply as new Bonus projects, and in the case of HMIS, to propose to expand current HMIS grant activities.

**HMIS Project Scoring and Ranking:**
HMIS projects will be score on a 100-point scale in five categories:
1. Project Type = Up to 5 points
2. Bed Coverage = Up to 15 points
3. Generating Required Reports = Up to 15 points
4. Point-In-Time Count = 15 Points
5. Ability to Generate System Performance Report = 10 points
6. Fully Expending Grant = Up to 5 points
7. Timely Submission of Grant Reports = 10 points
8. Data Quality assurance = Up to 15 points
9. Quality Assurance = Up to 10 points

If expanding to a new HMIS Project, a 110-point scale will be used by including the same point values as described above and adopting the performance of the existing HMIS project, with the addition of earning up to 10 additional points by describing how the proposed increased HMIS activities and funds will be expended consistent with the CoC’s HMIS funding and implementation strategy (see Page 9). This is a new required HUD rating factor for new HMIS Projects (NOFA, Page 38).

**Project must score a minimum of 60 points to be assured inclusion in the application package.** Projects scoring below that threshold will be reallocated. Applicants are strongly encouraged to review the Local Application, and to self-score their project on the performance indicators as soon as possible to determine if they will meet the minimum score. If in self-scoring the project does not appear to meet threshold, please contact info@everyonehome.org.

In addition to the total score projects receive, reviewers may use additional factors to break ties, adjust the final ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other local objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that may be considered include:
- the geographic and population diversity of the projects included;
- the projected impact of the loss of any residential buildings on homeless people;
- the expiration date and amount of the grant.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Friday, August 31st, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.
Eligible Applicants:
Only the HMIS Lead Agency may apply to the HUD CoC program for operating a Homeless Management Information System (HMIS). Alameda County Department of Housing and Community Development is the HMIS Lead agency for the Continuum of Care and the only eligible applicant for this project type. Applicants for renewing grants must be listed as the current grant recipient on the CoC’s 2018 Grant Inventory Worksheet approved by HUD.

Submission Requirements:
All project types must submit their Local Application Package response via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed HMIS Local Application Form, Grantee must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the applicant and Project name.

The HMIS Local Application Package will be released on Monday, July 30, 2018. A complete submitted Package will contain: 1) a complete HMIS Local Application Form; and 2) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Project to receive full points on a related section of the Application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

The required documents and instructions for their uses are described in greater detail in the sections below.

HMIS-based Reports:
a. HMIS report verifying bed coverage (2018 HIC)
b. HMIS report verifying ability to generate, system-wide APRs, AHAR, and the CAPER (most recent submissions)
c. Proof of the sheltered PIT and sub-populations report submitted for January 2018 (2018 PIT)
d. Systemwide APR for Federal fiscal year ending 9/30/17
e. HMIS reports verifying ability to produce HDX tables for systemwide performance report (Federal fiscal year ending 9/30/17)

Grant and Fiscal Management documents:
a. Proof of submission of the last three APRs, including due date and date of submission
b. Proof of LOCCS draws, including date of draw request, for the last two complete grant cycles
c. Most recent annual audit with Management Letter—must be from a fiscal year ending December 31, 2016 or later. If Applicant has submitted this document for another renewal project, the HMIS applicant will receive the same score for the renewal project under this Section.

Applicants responding to this RFP should be very familiar with the 2018 HUD NOFA and with the detailed guidance for completing new and renewing applications in e-snaps. Applicants are expected to know the eligible types of assistance, eligible populations, required match and other requirements from HUD. See 2018 CoC Notice of Funding Availability (NOFA) Competition.pdf for more information.
Download a Word version of this application from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on Page 1. Multiple PDFs for agencies with large files for backup are acceptable.

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   a. Was not evaluated according to the published local NOFA process AND/OR
   b. Evaluated in a way that violates federal regulations AND
   c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all.
   **Note:** this includes any Project who meet Appeals Criteria #a and/or #b, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) **What is not eligible for appeal:**
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project’s scores
   d. Need for funds
   e. Appeals submitted after stated deadline


All project applications received by the deadline will be reviewed and applicants will be notified by **Friday, August 31, 2018** of their score, their initial ranking, and whether they are being included in the Consolidated Application. Ranking is subject to change according to appeals (if any) and the final ranking will be released **September 14, 2018**.
MEMORANDUM

To: NOFA Committee; System Coordination Committee; EveryOne Home Leadership Board; Funder’s Collaborative

From: HUD CoC Committee

Date: July 17th, 2018

Re: Strategic Direction from HUD CoC Committee for Responding to the 2018 Continuum of Care Program Notice of Funding Availability (CoC NOFA)

The purpose of this Memo is to provide the HUD NOFA Committee with strategic guidance for approaching the local rating and ranking process for projects seeking to be included in the collaborative application for up to $37,452,457 in 2018 CoC Program funding for Alameda County. It is also a recommendation to the System Coordination Committee, EveryOne Home Leadership Board, Funders’ Collaborative, and local elected officials.

This strategic guidance was approved by the HUD CoC Committee in its July 17th meeting in Oakland. EveryOne Home staff provided analysis of the last two competitive applications and NOFA results and recommended strategies for this year’s NOFA competition. HUD CoC and NOFA committee members discussed and provided feedback that resulted in the set of Recommendations below to execute a fair local process to maintain an effective array of HUD CoC funded projects.

In addition to the set of Recommendations below, the most important message coming from the HUD CoC Committee is that without increasing local investment and aligning strategies to impact system performance, our Continuum is at serious risk of losing HUD funds in future NOFA rounds. As HUD continues to increase its ranking of Continuum’s based on their system performance, including how CoCs reduce first time homelessness, increase placement and retention into permanent housing, and reduce returns to homelessness, we must advocate the urgency of marshalling resources and strategies to improve aspects of system performance that are beyond the scope of HUD CoC funded individual projects. For example, the 11% increase in first time homelessness between FY 2016 and FY 2017 is a prevention issue, and there are not prevention projects in the HUD CoC package or prevention funds targeted for individuals and families facing imminent homelessness.

This Strategic Direction will be shared at the upcoming July 20th Bidder’s Conference for community’s consideration of the implementation of this guidance. In addition, we will share the same direction with the System Coordination Committee, the EOH Leadership Board, the
Funder's Collaborative, and with elected officials, as we adopt specific strategies and actions focused on preventing homelessness and increasing permanent homes through the Alameda county-wide 2018 Ending Homelessness Strategic Plan Update.

The NOFA Committee incorporate this strategic direction and set of recommendations in its process of designing the 2018 Local Application and scoring criteria:

**Recommendations**

**Recommendation 1: Strategic and purposeful Reallocation of Projects to better meet the needs of the Continuum of Care**

The HUD CoC Committee directs the NOFA Committee to pursue reallocation that strengthens our system and application package and is aligned with our guiding principles. For this year and future years, the HUD CoC Committee strongly recommends strategic reallocation of Projects with unspent funds and existing Projects seeking to convert to other project types (such as TH projects seeking to reallocate to Joint TH and PH-RRH projects) to better meet the needs of the CoC.

The Committee is also supportive of continuing to pursue strategies already in use such as; 1. Maintaining a minimum scoring threshold, and 2. Inviting voluntary reallocation.

**Recommendation 2: Incentivize the consolidation of existing renewal projects.**

Given that this year’s NOFA allows two or more projects eligible for renewal to consolidate and apply for funding to be combined into a single renewal project (once awarded), the HUD CoC Committee recommends the NOFA Committee considers providing point incentives during the Local Application to grantees willing to apply for consolidation of existing projects.

**Recommendation 3: Solicit applications for new projects under the Domestic Violence (DV) Bonus and limit the invitation of new project applications under Bonus funds to existing projects seeking expansion under NOFA criteria.**

**DV Bonus:** The HUD CoC Committee recommends encouraging applications targeting Domestic Violence survivors under HUD’s addition of $50 million in DV bonus funds to provide housing and services to survivors of domestic violence, dating violence, sexual assault and stalking. This new opportunity, which allows CoCs to create up to three new projects targeting DV survivors may allow our CoC to gain points, increase funding, and strengthening our Coordinated Entry’s system to better meet the need of DV, dating violence, sexual assault and stalking survivors.

**Bonus:** The Committee also recommends this year to limit the invitation of new projects under the Bonus funds to existing renewal projects seeking reallocation and expansion under the NOFA Expansion definition criteria on Page 17, including CoC program projects (new project application to expand current operations of a CoC funded renewal project) or non-CoC program
funded projects (an existing funded homeless project seeking CoC program funds). This strategy is intended to achieve HUD's expressed desire, to see projects fully occupied and expending funds as quickly as possible.

**Recommendation 4: Utilize the 2017 Guiding Principles**

The HUD CoC Committee reaffirmed the existing 2016/17 Guiding Principles, and added Principle #8, which was recommended at our February, 27th community meeting:

1. Maximize the resources available to community
2. Package submitted will align with HUD priorities to meet local needs
3. Prioritize ensuring existing residential capacity and housing stability is maintained systemwide
4. Keep the renewal process as simple as possible
5. Continue to emphasize project performance and the submission of projects that will meet HUD's thresholds
6. Support individual projects seeking to reallocate or reclassify where relevant
7. Facilitate a clear, fair and transparent local process
8. Advocate locally and nationally to protect and fund projects that add value to our Continuum of Care and response to homelessness
Points for NOFA Project Evaluation for Objective Criteria - Renewal Projects
Total points available = 79

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Project Cover Sheet = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>1.b Primary Activity type = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>□ Existing Permanent Housing (PSH &amp; RRH) and Youth-Serving TH = 5 Points</td>
<td></td>
</tr>
<tr>
<td>□ General use (non-youth serving) Transitional Housing = 3 Points</td>
<td></td>
</tr>
<tr>
<td>2. Project addresses Local and HUD Priorities = 16 Points maximum</td>
<td></td>
</tr>
<tr>
<td>2.a Target populations and severity of need = (up to 10 points)</td>
<td></td>
</tr>
<tr>
<td>Check any boxes that are true and can be verified by back up documentation. Project will receive the score from the highest single point value that can be verified, section is not cumulative.</td>
<td></td>
</tr>
<tr>
<td>□ Provides PSH to 100% of chronically homeless households as evidenced by EveryOne Home HUD CoC APR tool = 10 Points</td>
<td></td>
</tr>
<tr>
<td>□ Existing PSH which became DedicatedPLUS in 2017 = 9 Points</td>
<td></td>
</tr>
<tr>
<td>□ Provides PSH and fills 100% of turnover with chronically homeless households as evidenced by EveryOne Home HUD Target Population Report tool = 8 Points</td>
<td></td>
</tr>
<tr>
<td>□ Provides Rapid Rehousing to families, individuals and/or transition aged youth as evidenced by APR = 8 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = 6 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = 3 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = 6 Points</td>
<td></td>
</tr>
<tr>
<td>□ Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = 3 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of heads of households entered project from the streets or other places not meant for human habitation = 8 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of heads of households entered project from the streets or other places not meant for human habitation = 4 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of heads of households are fleeing domestic violence and/or human trafficking = 6 Points</td>
<td></td>
</tr>
<tr>
<td>□ EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of heads of households are fleeing domestic violence and/or human trafficking = 3 Points</td>
<td></td>
</tr>
<tr>
<td>2.b Housing First and Low Barrier documentation</td>
<td>6 Points maximum if documents demonstrate adherence to specific Housing First principles. All applicable boxes can be checked and points will be cumulative up to 10 points for this section when combined with the Local Application Package.</td>
</tr>
<tr>
<td>3 Outcome Performance = 32 Points maximum</td>
<td>3. a APR Performance Outcomes A-D = 32 Points maximum</td>
</tr>
<tr>
<td>4 Grant Management = up to 20 Points maximum</td>
<td>4. a Reports and Invoicing = 10 points maximum</td>
</tr>
<tr>
<td>4. b Capacity and Utilization = 5 points maximum</td>
<td>4. b The project was fully utilized (100%) during the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 5 Points. 5. The existing project was utilized to 90-99% during the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 4 Points. 6. The project was utilized to 80-89% during the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 2 Points. 7. The project was utilized at less than 80% for the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 0 Points.</td>
</tr>
<tr>
<td>4. c Client Eligibility = 5 points maximum</td>
<td>4. c Project’s written policy clearly describes client eligibility requirements and funding sources (i.e. eligibility requirements for mental health funding contracts), and requirements are consistent with specific project eligibility information provided to Coordinated Entry/HomeStretch = 2 Points. 5. Project has clear, written procedures for verification of client eligibility and homeless history, in addition to proof of referrals from Coordinated Entry/HomeStretch (i.e., CE HUB provided verification documentation, staff verification of 3rd party documentation, etc.) = 3 Points.</td>
</tr>
<tr>
<td>5 Organizational Capacity = 6 points maximum for entire section</td>
<td></td>
</tr>
</tbody>
</table>
### 5.a HMIS Data Completeness Report
- **Card = 2 Points maximum**
- Exiting project’s data quality score is greater than or equal to 95%, as evidenced by the EveryOne Home HUD CoC APR Tool = 2 Points
- Greater than or equal to 90% and below 95%, as evidenced by the EveryOne Home HUD CoC APR Tool = 1 Point
- Below 90%, as evidenced by the EveryOne Home HUD CoC APR Tool = 0 Points

### 5.b Fiscal Management = 4 points maximum
- Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2016, that shows no findings or areas of concern in the management letter. = 4 Points
- Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2015, that does show findings or areas of concern in the management letter. = 0 Points

## Local Application Criterion – Renewal Projects

<table>
<thead>
<tr>
<th>1</th>
<th>Project Evaluation of Objective Criteria Preliminary scores (Up to 79 points)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Note: Preliminary Project Evaluation scoring for Renewals is cumulative with Local Application scores</td>
<td></td>
</tr>
</tbody>
</table>

| 2 | Narrative for Housing First (up to 4 points) |
| Note: Points will be cumulative for this section when combined with the Project Evaluation Package’s HF Objective Criteria preliminary scores. |


| 5 | Narrative for Community Engagement – Not Scored in 2018. |

| 6 | Narrative(s) for Performance Outcomes A-D (low scoring projects only) |

| 7 | Spending (criteria to be determined) (5 points) |

| 8 | Cost Effectiveness (criteria to be determined by workgroup) (5 points) |

| 9 | Narrative for Client Eligibility (low scoring projects only) |

| 10 | Narrative for Fiscal Management (low scoring projects only) |

| 11 | Narrative for Quality Assurance (up to 7 points) |

**Total Local Application Points Possible: 21**

**Total Project Evaluation Points Possible: 79**

*Note: Local Application scoring for Renewals is cumulative with preliminary Project Evaluation scores*

**Total Points Possible: 100**
## NOFA LOCAL APPLICATION Scoring Tool - Renewal Projects

Total Points available = up to 21 Points

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Project addresses Local and HUD Priorities = up to 6 Points</td>
<td></td>
</tr>
<tr>
<td>1.a Housing First narrative = <strong>4 Points</strong> as determined by application scorers.</td>
<td>Housing First Narrative Questions = up to <strong>4 Points</strong> as determined by application scorers following Housing First Checklist (Principles: low barrier and no preconditions to entry; voluntary services and prioritizing engagement and problem-solving over therapeutic goals; and rapid placement and stabilization in permanent housing).</td>
</tr>
</tbody>
</table>
| **1.b Cost Effectiveness = 2 points** | Projects 100% dedicated to chronically homeless since inception or currently serving at least 50% chronically homeless adults average cost per outcome is 60% or less above average for comparable projects in package = **2 Points**  
Project’s average cost per outcome is 25% or less above average of comparable projects in package = **2 Points**  
Project’s average annual cost per outcome is 26% or more above average of comparable projects in package = **0 Points** |
| **2** Grant Management = up to 5 Points |  |
| 2.a Spending = **5 Points** maximum | Existing project spent 100-95% of funds in the last grant year = **5 Points**  
Existing project spent 94% or less of funds in the last grant year and provided a reasonable explanation (as determined by application scorers) = up to **3 Points**  
Existing project spent 94% or less of funds in the last grant year = **0 Points** |
| **3** Organizational Capacity = up to 7 points |  |
| 3.a Quality Assurance = **7 Points** as determined by application scorers. | Existing project will be scored a maximum of **7 points** for their Quality Assurance narrative as determined by application scorers. |
| **4** Consolidation = 3 points | Project is applying to consolidate programs = **3 points** |
1. Permanent Supportive Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Retains and/or exits to other Permanent Housing &gt; 12 months</td>
<td>95%</td>
</tr>
</tbody>
</table>
|         |           | □ Meets or exceeds local benchmark in an existing project = **10 Points**  
          |           | □ Is within 5 percentage points of the local benchmark in existing project = **8 Points**  
          |           | □ Is within 10 percentage points of the local benchmark within an existing project = **4 Points**  
          |           | □ Is > 10 percentage points below the local benchmark = **0 Points** |
| B       | Adults who maintain or increase income 50% of leavers and stayers | |
|         |           | □ Meets or exceeds local benchmark in existing project = **7 Points**  
          |           | □ Is within 5 percentage points of local benchmark in existing project = **5 Points**  
          |           | □ Is within 10 percentage points of local benchmark in existing project = **3 Points**  
          |           | □ Is > 10 percentage points below the local benchmark in existing project = **0 Points** |
| C       | Obtains/maintains non-cash mainstream benefits 56% leavers and stayers | |
|         |           | □ Meets or exceeds local benchmark in existing project = **7 Points**  
          |           | □ Is within 5 percentage points of local benchmark in existing project = **5 Points**  
          |           | □ Is within 10 percentage points of local benchmark in existing project = **3 Points**  
          |           | □ Is > 10 percentage points below the local benchmark in existing project = **0 Points** |
| D       | Exits to Homelessness Approx. 10% of total bed capacity | |
|         |           | □ Meets or exceeds local benchmark in existing project = **8 Points**  
          |           | □ Is within 1 exit of local benchmark in existing project = **6 Points**  
          |           | □ Is within 2 exits of local benchmark in existing project = **3 Points**  
          |           | □ Is 3 or more exits above the local benchmark in existing project = **0 Points** |

<table>
<thead>
<tr>
<th>Total Bed Capacity in Program</th>
<th>Benchmark Number of Exits to Homelessness (Approx. 10% of bed capacity)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-14</td>
<td>1</td>
</tr>
<tr>
<td>15-24</td>
<td>2</td>
</tr>
<tr>
<td>25-34</td>
<td>3</td>
</tr>
<tr>
<td>35-44</td>
<td>4</td>
</tr>
<tr>
<td>45-54</td>
<td>5</td>
</tr>
<tr>
<td>55-64</td>
<td>6</td>
</tr>
<tr>
<td>65-74</td>
<td>7</td>
</tr>
<tr>
<td>75-84</td>
<td>8</td>
</tr>
<tr>
<td>85-94</td>
<td>9</td>
</tr>
<tr>
<td>95-104</td>
<td>10</td>
</tr>
<tr>
<td>115-124</td>
<td>12</td>
</tr>
<tr>
<td>175+</td>
<td>18</td>
</tr>
</tbody>
</table>
### 2. Rapid Rehousing, Youth Serving Transitional Housing and Joint TH and PH-RRH

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtains Permanent Housing</td>
<td>80%</td>
<td>☐ Meets or exceeds local benchmark in an existing project = 10 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of the local benchmark in existing project = 8 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 10 percentage points of the local benchmark within an existing project = 4 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 10 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td>B Adults who increase income</td>
<td>30% of leavers and stayers</td>
<td>☐ Meets or exceeds local benchmark in existing project = 7 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of local benchmark in existing project = 5 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 10 percentage points of local benchmark in existing project = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>C Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td>☐ Meets or exceeds local benchmark in existing project = 7 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of local benchmark in existing project = 5 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 10 percentage points of local benchmark in existing project = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>D Returns to Homelessness</td>
<td>&lt;10%</td>
<td>☐ Meets or exceeds local benchmark in existing project = 8 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of local benchmark in existing project = 6 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 8 percentage points of local benchmark in existing project = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt;8 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
</tbody>
</table>
3. General (non-youth serving) Transitional Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
</table>
| A Obtains Permanent Housing | 80% | ☐ Meets or exceeds local benchmark = 10 Points  
☑ Is within 5 percentage points of the local benchmark = 8 Points  
☑ Is within 10 percentage points of the local benchmark = 4 Points  
☐ Is > 10 percentage points below the local benchmark = 0 Points |
| B Adults who maintain or increase income | 50% of leavers and stayers | ☐ Meets or exceeds local benchmark = 7 Points  
☑ Is within 10 percentage points of local benchmark = 6 Points  
☐ Is within 15 percentage points of local benchmark = 3 Points  
☐ Is > 15 percentage points below the local benchmark = 0 Points |
| C Obtains or Maintains non-cash Mainstream Benefits | 56% leavers and stayers | ☐ Meets or exceeds HUD benchmark = 7 Points  
☑ Is within 5 percentage points of HUD benchmark = 6 Points  
☐ Is within 10 percentage points of HUD benchmark = 3 Points  
☐ Is > 10 percentage points below the local benchmark = 0 Points |
| D Length of Time Homeless (length of stay in program) | Median LOS <180 days | ☐ Meets or exceeds local benchmark = 8 Points  
☑ Is within 10% (18 days) of local benchmark = 6 Points  
☑ Is within 20% (36 days) of local benchmark = 3 Points  
☐ Is > 20% above local benchmark = 0 Points |
Attachment A

Instructions for 2018 HUD NOFA Target Population Report

Updated March 26th, 2018
by EveryOne Home

These Instructions have been prepared to guide Projects on completing the 2018 HUD NOFA Target Population Report, which assesses the practices and prioritization of Target Populations and Severity of Need for each Project. This Report looks at data for clients with a program entry date from 10/1/16 - 9/30/2017. This method of calculation takes into account the fact that many projects have long-time clients who skew their data in a certain way but are now filling any turnover beds with high-needs or priority target populations. The instructions cover three Sections: (1) Running the 2017 NOFA - Program Entry Report, (2) Running the Demographics - With Detail report (for PSH Projects only), and (3) Running the Excel EveryOne Home HUD Target Population Data Tool to summarize the data. The corresponding manual calculations behind this Tool can be found starting on Page 16 of Attachment C - Manual Calculations & Explanation of Tool Calculations for Performance Outcomes.

NOTE: Agencies not using HMIS (e.g. domestic violence providers) can submit a Target Population Report following the instructions starting on Page 9 of this Attachment.

If you have any questions, please direct them to info@everyonehome.org. The FAQ period begins Monday, April 2, 2018 and ends Friday, April 6, 2018.

Projects renewing for the first time that are not yet under contract, or which were not in operation for a full twelve months since October 1, 2016:
Renewing projects without a year of operation and expenditures need only to submit an updated Project Cover Sheet. They will receive the score awarded when they applied as a new project and be ranked according to that score.

Projects with a start date later than October 1, 2016 and a full year of program data may elect to receive the score awarded when they applied as a new project or submit a full Project Evaluation Package based on data from their start date to twelve months later.

New TH-RRH Projects can have the option to: 1) keep the score obtained when applying as a new TH-RRH project in 2017, or 2) or submit a full Project Evaluation package to be evaluated according to data from 2017 as a general TH Project.

Projects that choose to keep their prior score need only to submit an updated Project Cover Sheet. They may also be asked to complete a Project Milestone Update as part of a Monitoring TA/Site Visit.
Target Population Report Tool Instructions for Agencies Not in HMIS

Given that the 2018 NOFA Program Entry Report is dependent on Alameda County’s ServicePoint HMIS system, Agencies not in HMIS cannot complete the 2018 HUD NOFA Target Population Report as instructed above. Agencies such as DV providers with a comparable database with the necessary information, can perform the calculations and enter data manually into the 2018 HUD NOFA Target Population Report.

The calculations for Target Population data are tabulated as follows:

1. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who entered from a place not meant for human habitation. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>Residence Prior to Program Entry</td>
<td>Place not meant for habitation (HUD)</td>
</tr>
</tbody>
</table>

2. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who are fleeing from domestic violence or human trafficking. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>Survivor or Victim of Domestic Violence or Human Trafficking</td>
<td>Yes (HUD)</td>
</tr>
<tr>
<td>If yes to the above question, still currently fleeing?</td>
<td>Yes (HUD)</td>
</tr>
</tbody>
</table>

3. Heads of households with a program entry date between 10/1/2016 – 9/30/17 and who are veterans of the U.S. Military. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>U.S. Military Veteran?</td>
<td>Yes (HUD)</td>
</tr>
</tbody>
</table>
4. Heads of households with a program entry date between 10/1/2016 – 9/30/2017 and who were between the ages of 18 and 24 at the time of program entry. The count is based on number of clients who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship to Head of Household</td>
<td>Self (head of household)</td>
</tr>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>Age at Program Entry</td>
<td>Between 18-24</td>
</tr>
</tbody>
</table>

5. (PSH Only) Households with a program entry date between 10/1/2016 – 9/30/17 with one or more chronically homeless persons. The count is based on number of HOUSEHOLDS who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
<tr>
<td>With 1 or more CH persons</td>
<td>Yes</td>
</tr>
</tbody>
</table>

6. (All projects) Households with a program entry date between 10/1/2016 – 9/30/17. The count is based on number of HOUSEHOLDS who fit all the following criteria:

<table>
<thead>
<tr>
<th>Field</th>
<th>Response Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Entry Date</td>
<td>Between 10/1/2016 and 9/30/2017</td>
</tr>
</tbody>
</table>

Once the above information, from 1 to 6, is gathered, open the Non-HMIS Version of the EveryOne Home Target Population Report and input the information into the “Report Details” tab.

In the following illustration, the red numbers correspond directly to 1 through 6 of the above list and indicate the data that should be entered.

There are already formulas in the Excel sheets to calculate the summary score, % households, and other information. Therefore, sections 1 through 6 are the only data points that the agency needs to input.
2018 NOFA Local Review Process Renewals’ Project Evaluation Package

Please download the Project Evaluation Instructions and Form below. Review the instructions located on pages i-v of the EveryOne Home instructions and Evaluation Form carefully. The Cover Sheet for each Project has been emailed to the specific NOFA grantee.

The Project Evaluation Package is due via email to info@everyonelocal.org by 5pm on Thursday, April 26, 2018. Preliminary scores will be released via email by close of business on Monday, April 30, 2018.

Instruction Update for All Projects: The APR and Target Population Report Tools have been updated from our initial release on 3/29/2018 to correct errors relating to: (i) division by zero; (ii) calculations for Outcome B for RRH and TAYCH; (iii) file import errors; and (iv) rounding errors. All projects are asked to re-run reports using the updated APR and Target Population Report Tools for submission.

The Project Eval Form was updated on 4/12/2018 to correct a technical error when making selections in the Scoring Tool.

2018 Project Evaluation FAQ and Instruction Update
2018 Project Evaluation Instructions and Form
2018 EveryOne Home HUD CoC APR Tool (Updated 4.6.18)
2018 EveryOne Home HUD Target Population Report Tool (Updated 4.5.18)
2018 (Non-HMIS Agencies Only) HUD Target Population Report Tool
Target Population Instructions (Attachment A)
APR Instructions (Attachment B)
Performance Outcome Manual Calculations (Attachment C)
2017 HIC and GFW (Attachment D)

2017 NOFA Debrief Input Session Materials

Below are the materials from the NOFA Debrief Input Session on February 27th. Please note that the date for the 2018 NOFA Process Renewals Project Evaluation package release has been moved.
## Total Population PIT Count Data

<table>
<thead>
<tr>
<th></th>
<th>2016 PIT</th>
<th>2017 PIT</th>
<th>2018 PIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count</td>
<td>4145</td>
<td>5629</td>
<td>5496</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>892</td>
<td>1,022</td>
<td>962</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>0</td>
<td>11</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>856</td>
<td>744</td>
<td>660</td>
</tr>
<tr>
<td>Total Sheltered Count</td>
<td>1748</td>
<td>1766</td>
<td>1633</td>
</tr>
<tr>
<td>Total Unsheltered Count</td>
<td>2397</td>
<td>3863</td>
<td>3863</td>
</tr>
</tbody>
</table>

## Chronically Homeless PIT Counts

<table>
<thead>
<tr>
<th></th>
<th>2016 PIT</th>
<th>2017 PIT</th>
<th>2018 PIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count of Chronically Homeless Persons</td>
<td>753</td>
<td>1707</td>
<td>1742</td>
</tr>
<tr>
<td>Sheltered Count of Chronically Homeless Persons</td>
<td>214</td>
<td>298</td>
<td>333</td>
</tr>
<tr>
<td>Unsheltered Count of Chronically Homeless Persons</td>
<td>539</td>
<td>1,409</td>
<td>1,409</td>
</tr>
</tbody>
</table>
# 2018 HDX Competition Report

## PIT Count Data for CA-502 - Oakland, Berkeley/Alameda County CoC

### Homeless Households with Children PIT Counts

<table>
<thead>
<tr>
<th></th>
<th>2016 PIT</th>
<th>2017 PIT</th>
<th>2018 PIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children</td>
<td>316</td>
<td>270</td>
<td>256</td>
</tr>
<tr>
<td>Sheltered Count of Homeless Households with Children</td>
<td>269</td>
<td>261</td>
<td>247</td>
</tr>
<tr>
<td>Unsheltered Count of Homeless Households with Children</td>
<td>47</td>
<td>9</td>
<td>9</td>
</tr>
</tbody>
</table>

### Homeless Veteran PIT Counts

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Sheltered and Unsheltered Count of the Number of Homeless Veterans</td>
<td>488</td>
<td>401</td>
<td>531</td>
<td>526</td>
</tr>
<tr>
<td>Sheltered Count of Homeless Veterans</td>
<td>143</td>
<td>170</td>
<td>153</td>
<td>148</td>
</tr>
<tr>
<td>Unsheltered Count of Homeless Veterans</td>
<td>345</td>
<td>231</td>
<td>378</td>
<td>378</td>
</tr>
</tbody>
</table>
## HMIS Bed Coverage Rate

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Total Beds in 2018 HIC</th>
<th>Total Beds in 2018 HIC Dedicated for DV</th>
<th>Total Beds in HMIS</th>
<th>HMIS Bed Coverage Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Shelter (ES) Beds</td>
<td>872</td>
<td>180</td>
<td>501</td>
<td>72.40%</td>
</tr>
<tr>
<td>Safe Haven (SH) Beds</td>
<td>12</td>
<td>0</td>
<td>12</td>
<td>100.00%</td>
</tr>
<tr>
<td>Transitional Housing (TH) Beds</td>
<td>752</td>
<td>12</td>
<td>660</td>
<td>89.19%</td>
</tr>
<tr>
<td>Rapid Re-Housing (RRH) Beds</td>
<td>602</td>
<td>0</td>
<td>529</td>
<td>87.87%</td>
</tr>
<tr>
<td>Permanent Supportive Housing (PSH) Beds</td>
<td>2925</td>
<td>32</td>
<td>2267</td>
<td>78.36%</td>
</tr>
<tr>
<td>Other Permanent Housing (OPH) Beds</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Total Beds</strong></td>
<td><strong>5,163</strong></td>
<td><strong>224</strong></td>
<td><strong>3969</strong></td>
<td><strong>80.36%</strong></td>
</tr>
</tbody>
</table>
### PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

<table>
<thead>
<tr>
<th>Chronically Homeless Bed Counts</th>
<th>2016 HIC</th>
<th>2017 HIC</th>
<th>2018 HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC</td>
<td>676</td>
<td>715</td>
<td>720</td>
</tr>
</tbody>
</table>

### Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

<table>
<thead>
<tr>
<th>Households with Children</th>
<th>2016 HIC</th>
<th>2017 HIC</th>
<th>2018 HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRH units available to serve families on the HIC</td>
<td>78</td>
<td>89</td>
<td>131</td>
</tr>
</tbody>
</table>

### Rapid Rehousing Beds Dedicated to All Persons

<table>
<thead>
<tr>
<th>All Household Types</th>
<th>2016 HIC</th>
<th>2017 HIC</th>
<th>2018 HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRH beds available to serve all populations on the HIC</td>
<td>387</td>
<td>443</td>
<td>602</td>
</tr>
</tbody>
</table>
Measure 1: Length of Time Persons Remain Homeless

This measure the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.
Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client’s entry, exit, and bed night dates strictly as entered in the HMIS system.

<table>
<thead>
<tr>
<th>Metric</th>
<th>Universe (Persons)</th>
<th>Average LOT Homeless (bed nights)</th>
<th>Median LOT Homeless (bed nights)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Persons in ES and SH</td>
<td>2266 2361</td>
<td>96 99 3</td>
<td>60 59 -1</td>
</tr>
<tr>
<td>1.2 Persons in ES, SH, and TH</td>
<td>3249 3258</td>
<td>186 170 -16</td>
<td>114 93 -21</td>
</tr>
</tbody>
</table>

b. This measure is based on data element 3.17.

This measure includes data from each client’s Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client’s entry date, effectively extending the client’s entry date backward in time. This “adjusted entry date” is then used in the calculations just as if it were the client’s actual entry date.

The construction of this measure changed, per HUD’s specifications, between FY 2016 and FY 2017. HUD is aware that this may impact the change between these two years.
## FY2017 - Performance Measurement Module (Sys PM)

<table>
<thead>
<tr>
<th>Universe (Persons)</th>
<th>Average LOT Homeless (bed nights)</th>
<th>Median LOT Homeless (bed nights)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Persons in ES, SH, and PH (prior to &quot;housing move in&quot;)</td>
<td>2195</td>
<td>2354</td>
</tr>
<tr>
<td>1.2 Persons in ES, SH, TH, and PH (prior to &quot;housing move in&quot;)</td>
<td>3157</td>
<td>3466</td>
</tr>
</tbody>
</table>
Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

After entering data, please review and confirm your entries and totals. Some HMIS reports may not list the project types in exactly the same order as they are displayed below.

<table>
<thead>
<tr>
<th>Exit was from</th>
<th>Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)</th>
<th>Returns to Homelessness in Less than 6 Months</th>
<th>Returns to Homelessness from 6 to 12 Months</th>
<th>Returns to Homelessness from 13 to 24 Months</th>
<th>Number of Returns in 2 Years</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>FY 2017</td>
<td>% of Returns</td>
<td>FY 2017</td>
<td>% of Returns</td>
<td>FY 2017</td>
</tr>
<tr>
<td>Exit was from SO</td>
<td>126</td>
<td>8%</td>
<td>5</td>
<td>4%</td>
<td>8</td>
</tr>
<tr>
<td>Exit was from ES</td>
<td>617</td>
<td>92%</td>
<td>39</td>
<td>6%</td>
<td>60</td>
</tr>
<tr>
<td>Exit was from TH</td>
<td>642</td>
<td>49%</td>
<td>32</td>
<td>5%</td>
<td>50</td>
</tr>
<tr>
<td>Exit was from SH</td>
<td>0</td>
<td>0%</td>
<td>0</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>Exit was from PH</td>
<td>936</td>
<td>35%</td>
<td>30</td>
<td>3%</td>
<td>25</td>
</tr>
<tr>
<td>TOTAL Returns to Homelessness</td>
<td>2321</td>
<td>184%</td>
<td>106</td>
<td>5%</td>
<td>143</td>
</tr>
</tbody>
</table>

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts
This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

<table>
<thead>
<tr>
<th></th>
<th>January 2016 PIT Count</th>
<th>January 2017 PIT Count</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Total PIT Count of sheltered and unsheltered persons</td>
<td>4145</td>
<td>5629</td>
<td>1484</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>892</td>
<td>1022</td>
<td>130</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>856</td>
<td>744</td>
<td>-112</td>
</tr>
<tr>
<td>Total Sheltered Count</td>
<td>1748</td>
<td>1766</td>
<td>18</td>
</tr>
<tr>
<td>Unsheltered Count</td>
<td>2397</td>
<td>3863</td>
<td>1466</td>
</tr>
</tbody>
</table>

**Metric 3.2 – Change in Annual Counts**

This measures the change in annual counts of sheltered homeless persons in HMIS.

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Unduplicated Total sheltered homeless persons</td>
<td>3547</td>
<td>3481</td>
<td>-66</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>2270</td>
<td>2363</td>
<td>93</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>1570</td>
<td>1370</td>
<td>-200</td>
</tr>
</tbody>
</table>
Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

**Metric 4.1 – Change in earned income for adult system stayers during the reporting period**

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of</td>
<td>1297</td>
<td>1233</td>
<td>-64</td>
</tr>
<tr>
<td>adults (system stayers)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of adults with increased earned income</td>
<td>50</td>
<td>78</td>
<td>28</td>
</tr>
<tr>
<td>Percentage of adults who increased earned income</td>
<td>4%</td>
<td>6%</td>
<td>2%</td>
</tr>
</tbody>
</table>

**Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period**

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of</td>
<td>1297</td>
<td>1233</td>
<td>-64</td>
</tr>
<tr>
<td>adults (system stayers)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of adults with increased non-employment cash income</td>
<td>214</td>
<td>278</td>
<td>64</td>
</tr>
<tr>
<td>Percentage of adults who increased non-employment cash income</td>
<td>16%</td>
<td>23%</td>
<td>7%</td>
</tr>
</tbody>
</table>

**Metric 4.3 – Change in total income for adult system stayers during the reporting period**

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of</td>
<td>1297</td>
<td>1233</td>
<td>-64</td>
</tr>
<tr>
<td>adults (system stayers)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of adults with increased total income</td>
<td>242</td>
<td>336</td>
<td>94</td>
</tr>
<tr>
<td>Percentage of adults who increased total income</td>
<td>19%</td>
<td>27%</td>
<td>8%</td>
</tr>
</tbody>
</table>
### Metric 4.4 – Change in earned income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>709</td>
<td>638</td>
<td>-71</td>
</tr>
<tr>
<td>Number of adults who exited with increased earned income</td>
<td>123</td>
<td>102</td>
<td>-21</td>
</tr>
<tr>
<td>Percentage of adults who increased earned income</td>
<td>17%</td>
<td>16%</td>
<td>-1%</td>
</tr>
</tbody>
</table>

### Metric 4.5 – Change in non-employment cash income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>709</td>
<td>638</td>
<td>-71</td>
</tr>
<tr>
<td>Number of adults who exited with increased non-employment cash income</td>
<td>165</td>
<td>133</td>
<td>-32</td>
</tr>
<tr>
<td>Percentage of adults who increased non-employment cash income</td>
<td>23%</td>
<td>21%</td>
<td>-2%</td>
</tr>
</tbody>
</table>

### Metric 4.6 – Change in total income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>709</td>
<td>638</td>
<td>-71</td>
</tr>
<tr>
<td>Number of adults who exited with increased total income</td>
<td>270</td>
<td>211</td>
<td>-59</td>
</tr>
<tr>
<td>Percentage of adults who increased total income</td>
<td>38%</td>
<td>33%</td>
<td>-5%</td>
</tr>
</tbody>
</table>
**2018 HDX Competition Report**

**FY2017 - Performance Measurement Module (Sys PM)**

**Measure 5: Number of persons who become homeless for the 1st time**

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Universe:</strong> Person with entries into ES, SH or TH during the reporting period.</td>
<td>2516</td>
<td>2629</td>
<td>113</td>
</tr>
<tr>
<td>Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.</td>
<td>711</td>
<td>656</td>
<td>-55</td>
</tr>
<tr>
<td>Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)</td>
<td>1805</td>
<td>1973</td>
<td>168</td>
</tr>
</tbody>
</table>

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Universe:</strong> Person with entries into ES, SH, TH or PH during the reporting period.</td>
<td>3784</td>
<td>4024</td>
<td>240</td>
</tr>
<tr>
<td>Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.</td>
<td>1096</td>
<td>1045</td>
<td>-51</td>
</tr>
<tr>
<td>Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)</td>
<td>2688</td>
<td>2979</td>
<td>291</td>
</tr>
</tbody>
</table>
Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD’s Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in FY2017 (Oct 1, 2016 - Sept 30, 2017) reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Persons who exit Street Outreach</td>
<td>1636</td>
<td>2122</td>
<td>486</td>
</tr>
<tr>
<td>Of persons above, those who exited to temporary &amp; some institutional destinations</td>
<td>582</td>
<td>756</td>
<td>174</td>
</tr>
<tr>
<td>Of the persons above, those who exited to permanent housing destinations</td>
<td>114</td>
<td>70</td>
<td>-44</td>
</tr>
<tr>
<td>% Successful exits</td>
<td>43%</td>
<td>39%</td>
<td>-4%</td>
</tr>
</tbody>
</table>

Metric 7b.1 – Change in exits to permanent housing destinations
## Metric 7b.2 – Change in exit to or retention of permanent housing

<table>
<thead>
<tr>
<th>Description</th>
<th>Submitted FY 2016</th>
<th>FY 2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Universe: Persons in all PH projects except PH-RRH</strong></td>
<td>2494</td>
<td>2292</td>
<td>-202</td>
</tr>
<tr>
<td>Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations</td>
<td>2404</td>
<td>2226</td>
<td>-178</td>
</tr>
<tr>
<td>% Successful exits/retention</td>
<td>96%</td>
<td>97%</td>
<td>1%</td>
</tr>
</tbody>
</table>
This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.
<table>
<thead>
<tr>
<th></th>
<th>All ES, SH</th>
<th>All TH</th>
<th>All PSH, OPH</th>
<th>All RRH</th>
<th>All Street Outreach</th>
</tr>
</thead>
<tbody>
<tr>
<td>beds on HIC</td>
<td>665</td>
<td>656</td>
<td>678</td>
<td>692</td>
<td>1106</td>
</tr>
<tr>
<td>Beds</td>
<td>445</td>
<td>446</td>
<td>500</td>
<td>501</td>
<td>871</td>
</tr>
<tr>
<td>3. HMIS Participation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rate from HIC (%)</td>
<td>66.92</td>
<td>67.99</td>
<td>73.75</td>
<td>72.40</td>
<td>78.75</td>
</tr>
<tr>
<td>4. Unduplicated</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Persons Served (HMIS)</td>
<td>2760</td>
<td>2375</td>
<td>2347</td>
<td>2218</td>
<td>1637</td>
</tr>
<tr>
<td>5. Total Leavers (HMIS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2258</td>
<td>1890</td>
<td>1870</td>
<td>1750</td>
<td>811</td>
</tr>
<tr>
<td>6. Destination of</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Don't Know, Refused,</td>
<td>358</td>
<td>105</td>
<td>112</td>
<td>235</td>
<td>32</td>
</tr>
<tr>
<td>or Missing (HMIS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Destination Error</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rate (%)</td>
<td>15.85</td>
<td>5.56</td>
<td>5.99</td>
<td>13.43</td>
<td>3.95</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FY2017 - SysPM Data</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Date of PIT Count

<table>
<thead>
<tr>
<th>Date CoC Conducted 2018 PIT Count</th>
<th>1/30/2018</th>
</tr>
</thead>
</table>

## Report Submission Date in HDX

<table>
<thead>
<tr>
<th>Submitted On</th>
<th>Met Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018 PIT Count Submittal Date</td>
<td>Yes</td>
</tr>
<tr>
<td>2018 HIC Count Submittal Date</td>
<td>Yes</td>
</tr>
<tr>
<td>2017 System PM Submittal Date</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Alameda Countywide
Homeless Continuum of Care Council

InHOUSE
Policies and Procedures Manual
Alameda Countywide Homeless Continuum of Care Council
Policies and Procedures for the InHOUSE System

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Signed Agreements:

1.0 InHOUSE Partner MOU:

Policy:

Each participating agency/jurisdiction must have a signed Memorandum of Understanding (MOU) with the Alameda Countywide Homeless Continuum of Care Council to use the InHOUSE system and must be compliant with the terms of the MOU to continue use of InHOUSE.

Procedure:
A. Each participating agency/jurisdiction will be given two copies of the InHOUSE Partner MOU by the Council staff for signature.
B. The participating agency/jurisdiction will sign and return both copies of the MOU to the Council.
C. Council Staff will sign the MOU, retain one signed MOU and return the second copy to the agency/jurisdiction.
   See Appendix A.

1.1 Privacy Agreement:

Policy:

A Privacy Agreement must be signed by each agency/jurisdiction staff who will handle client data intended for or generated by the InHOUSE system prior to collecting or handling client data. The Privacy Agreement lists the privacy and confidentiality provisions to abide by.

Procedure:
A. Each participating agency/jurisdiction will provide Council staff with the names of their identified staff requiring certification and Privacy Agreements.
B. Each participating agency/jurisdiction’s staff will be given a Privacy Agreement for signature at the Privacy and Security Certification Training.
   See Appendix B.
1.2 User Agreement:

Policy:

A User Agreement must be signed by each InHOUSE system user prior to a license being issued to that user and the terms of use must be adhered to in order to retain user access and rights.

Procedure:

A. Each participating agency/jurisdiction will provide Council staff with the names of their identified system users requiring licensed access.

B. Each participating agency/jurisdiction will be given a User Agreement for each of its InHOUSE system users by the Council staff for signature.

C. Council Staff will retain the original User Agreements and copies will be provided to the agency/jurisdiction.

D. Licensed access to the InHOUSE system will be granted after receipt of the User Agreement and completion of both Privacy and Security Certification Training and User Training.

See Appendix C.
Participating Agency/Jurisdiction:

2.0 Roles and Responsibilities:

Policy:

Each participating agency/jurisdiction is responsible for developing and maintaining an internal infrastructure to support and monitor their agency and users’ adherence to the Governing Principles and Policies and Procedures of the Countywide InHOUSE system.

Procedure:

A. Each participating agency/jurisdiction will identify an InHOUSE “Manager” who will hold final responsibility for the adherence of his/her agency’s/jurisdiction’s personnel to the Governing Principles, and Policies and Procedures outlined in this document.

B. Each participating agency/jurisdiction will identify personnel to fulfill the following roles for implementation and maintenance of the InHOUSE system. The roles may be re-assigned to more or fewer than four individuals.

Implementation Team Leader (role de-activated after implementation)

1. Lead agency contact with InHOUSE Implementation Project Manager.

2. Responsible for insuring HMIS is fully implemented in their agency.

3. Insures all tasks for three roles listed below are completed in a timely manner as specified.

4. Must attend all Implementation Team meetings or to debrief and strategize regularly with three team members listed below.

Implementation Specialist (role de-activated after implementation)

1. Data collection needs-related contact person for InHOUSE Countywide Project Manager.

2. Communicate about the services and reporting requirements of agency for incorporation into the InHOUSE system.

3. Make recommendations about data elements and pick lists.

4. Shop ideas and discuss decisions back at the agency and build buy-in for the system and decisions made in InHOUSE Implementation meetings.
Policies and Procedures Administrator
2. Maintain current InHOUSE-related files, including Privacy and User Agreements and InHOUSE Partner MOU.
3. Conduct one-on-one Privacy and Security Certification Training as needed.
4. Maintain compliance with confidentiality policies.
5. Respond to end-user system questions.

Technical Administrator
1. Add users to agency system.
2. Setup/monitor password screensavers.
3. Monitor end user workstation security.
5. Maintain and update firewalls and virus protection on agency computer system/network.
6. Maintain system software updates on end user workstations.
7. Manage digital certificates.
8. Respond to end-user system questions.
9. Work with InHOUSE System Administrator on unresolved software issues.
10. Work with InHOUSE System Administrator when Administrative system changes are requested by Agency.
11. Add/Update Agency & Program I&R.
12. Run Provider Reports.
13. Create Custom Reports.
15. Audit User Reports.

Note: Must be able to perform all client/services/shelter software functions at agency level.
Participating Agency/Jurisdiction:

2.0 Roles and Responsibilities: *(continued)*

**InHOUSE Manager** (begins after agency/jurisdiction’s implementation)
1. Lead contact for the InHOUSE System Administrator.
2. Responsible for insuring InHOUSE is properly utilized and in compliance in their agency.
3. Responsible for insuring that his/her agency’s/jurisdiction’s personnel adhere to the Governing Principles and Policies and Procedures outlined in this document.
4. Respond to questions from Technical Administrator and Policy and Procedures Administrator.
5. Oversee and monitor the ongoing tasks of the Technical Administrator and Policy and Procedures Administrator.
6. Represent agency/jurisdiction at periodic InHOUSE user meetings.
7. Bring ideas, concerns and issues to periodic InHOUSE user meetings to facilitate enhancements and improvements to the system.
8. Conduct one-on-one Privacy and Security Certification Training as needed.
2.1 Access to Internet:

Policy:

Each participating agency/jurisdiction is responsible for maintaining their agency's/jurisdiction's Internet Connection and troubleshooting any problems with the connection.

2.2 Privacy Requirements:

Policy:

Each participating agency/jurisdiction must comply with the HMIS Privacy Standards 4.1 through 5.2.1 described in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice, including all Baseline Requirements and with Additional Privacy Protections specified by the InHOUSE Policies and Procedures manual.

Each participating agency/jurisdiction will document all baseline privacy requirements and all additional privacy protections in its Privacy Notice document.

Procedure:

A. Each participating agency/jurisdiction will document and publish a Privacy Notice describing its policies and practices for the processing of Protected Personal Identifiers (PPI). This notice must include all baseline privacy protections and all additional privacy protections.

B. If the agency/jurisdiction has a website, a copy of the Privacy Notice document will be posted on that website.

C. Agency/jurisdiction must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (annually or otherwise) a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.
Participating Agency/Jurisdiction:

2.2 Privacy Requirements: (continued)

Baseline Requirements:

All baseline privacy requirements described in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice are included in full text and summary in Appendix C and Appendix D of this manual.

Additional Privacy Protections:

Collection Limitation
1. PPI will only be collected with the knowledge or consent of the individual (unless required by law).
2. Written consent will be obtained from the individual for the collections of personal information from the individual or from a third party.

Purpose Specifications and Use Limitation
1. Users and agency/jurisdiction agree to additional restrictions on use or disclosure of an individual’s PPI at the request of the individual if the request is reasonable. The agency/jurisdiction is bound by this agreement except if inconsistent with legal requirements.

Access and Correction
1. Client appeals of a denial of access to or correction(s) of collected data will be accepted. Each participating agency/jurisdiction will adopt its own appeal procedure and describe the procedure in its Privacy Notice.
2. The agency/jurisdiction will provide to any individual appealing an access or correction decision a written explanation of the reason(s) for the denial.

Accountability
1. Each member of agency/jurisdiction staff (including employees, volunteers, affiliates, contractors and associates) of a participating agency/jurisdiction will undergo (annually or otherwise) formal training in privacy requirements.
2. Each participating agency/jurisdiction will establish a method, such as an internal audit, for regularly reviewing compliance with its privacy policy.
3. Each participating agency/jurisdiction will establish an internal appeal process for hearing an appeal of a privacy complaint or an appeal of a denial of access or corrections rights.
2.3 Notification of Privacy Protections:

Policy:

Each participating agency/jurisdiction will document all privacy protections in its Privacy Notice document.

Procedure:

A. Each participating agency/jurisdiction will document and publish a Privacy Notice describing its policies and practices for the processing of Protected Personal Identifiers (PPI). This notice must include all the above listed additional privacy protections in its published Privacy Notice.

B. The Council has a sample privacy notice that describes the data uses and system-wide privacy protections for non-HIPAA covered entities. Agencies/jurisdictions may customize this sample, adding in the agency name and any additional uses or protections specific to the agency/jurisdiction.

C. If the agency/jurisdiction has a website, a copy of the Privacy Notice document must be posted on that website.

D. Agency/jurisdiction must post a sign stating the availability of its privacy notice to any individual who requests a copy. The Council has prepared a sample of this signage.

E. Each participating agency/jurisdiction will establish or modify all necessary internal or external processes required to accommodate all the above listed additional privacy protections.

F. HIPAA-covered entities should review their current Privacy Notice to ensure it accurately discloses the collection and use of data for InHOUSE.

G. Further guidance from CoC will be forthcoming as it becomes available regarding InHOUSE implementation specific to HIPAA-covered entities.
Participating Agency/Jurisdiction:

2.4 Notice to Clients of Participation in InHOUSE:

Policy:

Clients of each agency/jurisdiction participating in the InHOUSE system will be informed by a posted notice of the agency's/jurisdiction's participation.

Procedure:
A. Each participating agency/jurisdiction will post a notice in full view of clients in the offices where intake occurs.
B. The size of the notice must compete favorably with others posters and notices in the intake office.
C. Disclosure of the agency's/jurisdiction's participation in the Alameda County InHOUSE system may be added to the 4.2.1 Collection Limitation sign template identified in the HUD HMIS Final Standards. The Council has prepared a sample of this signage.
D. When administration of an intake occurs in an off-site location (e.g. the home of a participant), the client must be given a copy of the agency/jurisdiction's Privacy Notice in addition to the “What is INHOUSE?“ form distributed while seeking consent for the Release of Information.

2.5 Need-based Access:

Policy:

Access to the InHOUSE system will be based on need. Need exists only for staff who work directly with (or supervise staff who work directly with) clients or have data entry or data reporting responsibilities. Appropriate license access levels will correspond to staff's need and use of data.

Procedure:
A. Each participating agency/jurisdiction will identify the specific staff members to obtain licensed access to the InHOUSE system based on this policy and assist the InHOUSE System Administrator in determining appropriate level of access.
2.6 Access Privileges to InHOUSE Software:

Policy:

Each participating agency/jurisdiction staff member must be trained in both privacy and security procedures, and in specific software use to obtain licensed access to the InHOUSE system. Licensed access to the InHOUSE system may never be “shared” with another individual.

Procedure:

A. Each participating agency/jurisdiction will identify the specific staff members to obtain licensed access to the InHOUSE system.

B. Each identified member must successfully complete the following:
   1. InHOUSE Privacy and Security Certification training.
   2. Agree to all provisions of use by reading and signing the InHOUSE Privacy Agreement. (See Appendix B)
   3. Agree to all provisions of use by reading and signing the InHOUSE User Agreement. (See Appendix C)
   4. ServicePoint User Training or InHOUSE agency administrator training.

C. Each user will create and maintain an independent and private password which will not be disclosed to anyone.
Participating Agency/Jurisdiction:

2.7 Breach of Confidentiality and/or Security:

Policy:

A breach of confidentiality and/or security by any agency/jurisdiction participant in the InHOUSE system will result in consequences up to and including termination of user rights and, potentially, termination of employment. An agency/jurisdiction that is found to have consistently and/or flagrantly violated confidentiality and/or security protocols may have their access privileges suspended or revoked.

Procedure:

A. Agency/Jurisdiction will notify InHOUSE System Administrator within three (3) business days of any identified breach of security.

B. InHOUSE System Administrator will review agency/jurisdiction data and discuss the situation with the agency/jurisdiction within three (3) business days. In addition, the InHOUSE System Administrator will inform designated CoC staff about the issue and convey the relative seriousness of the breach.

C. Based on the seriousness of the breach of security and/or confidentiality, CoC staff will recommend an appropriate intervention to the Executive Committee of the Council.

D. The Executive Committee of the Council, or a designated special committee of the Executive Committee, will decide whether a downgrading of system access, loss of user privileges, or other intervention is necessary.

E. Appeals may be made to the Executive Committee of the Council or a designated special committee of the Executive Committee.

F. Agency/jurisdiction is expected to make decisions about disciplinary action, up to and including termination, in accordance with agency/jurisdiction policies and values.

G. The InHOUSE System Administrator will monitor access logs regularly and report suspicious activity to the designated CoC staff person and agency/jurisdiction InHOUSE Manager.
2.8 Revocation or Revision of Access Privileges:

Policy:

Other violations of system use protocols (other than breaches of confidentiality and/or security) may warrant revocation of user privileges, downgrading of access, and/or disciplinary action of specific end users by the agency/jurisdiction.

Procedure:
A. Agencies/jurisdictions should undertake disciplinary action with employees as appropriate and in accordance with agency/jurisdictional policies.
B. Agencies/jurisdictions must notify the InHOUSE System Administrator with information about any violation(s) of the policies and procedures set forth in this document or any signed MOUs and/or signed InHOUSE forms within three (3) business days of the identified incident(s) of misuse or abuse of InHOUSE privileges.
C. The InHOUSE System Administrator will monitor access logs and other system information regularly and report suspicious activity to the designated CoC staff person and agency/jurisdiction InHOUSE Manager.
D. Once notified by agency/jurisdiction of a violation, CoC staff will respond within fifteen (15) working days with appropriate discussions and/or intervention steps. Possible intervention steps, depending on the severity of the violation, include revocation of user privileges or downgrading of access rights.
E. All sanctions are imposed by the agency/jurisdiction and/or the Council’s Executive Committee or a special committee of the Executive Committee (such as the System Grievance and Security Committee, see Section 10.1).
F. All sanctions imposed by the agency/jurisdiction can be appealed to the CoC Executive Committee or a special committee of the Executive Committee (such as the System Grievance and Security Committee, see Section 10.1).
G. All sanctions imposed by the CoC Executive Committee or its designee following the disposition of the appeal are final and binding.
2.9 Participant Data:

Policy:

HUD prohibits predicing access and utilization of services on consent for entry into the HMIS. However, funders of certain programs may require that data be collected and electronically entered and maintained in order to provide services. CoC acknowledges this conundrum and lays out the following procedures to accommodate this discrepancy in the guidelines for some programs.

Agency/jurisdiction may collect and store Client data in InHOUSE without express written consent providing the following are completed:

- The data is stored within InHOUSE such that it is inaccessible to other agencies,
- Appropriate disclosure is included in the agency/jurisdiction’s Privacy Notice, and
- Clients receive and initial for receipt of the “What is InHOUSE?” form.
2.10 Quarterly Compliance Review:

Policy:

Each participating agency/jurisdiction will conduct a quarterly monitoring to review adherence to the Governing Principles and Policies and Procedures of the Countywide InHOUSE system. A plan must be developed to correct any problems that are identified. Council staff or designees will periodically review participating agency/jurisdiction’s quarterly monitoring to ensure system-wide compliance and adherence to Governing Principles and Policies and Procedures of the Countywide InHOUSE system.

Procedure:

A. Agency/jurisdiction’s quarterly monitoring will review privacy/confidentiality, data quality, and security, as follows:

1. **Privacy/Confidentiality**
   a) The agency/jurisdiction must review dataflow to insure all Privacy and Security requirements are met in obtaining and entering client data.

2. **Data Quality**
   a) Review system reports on completeness of required data.
   b) Determine that all definitions are being applied uniformly.

3. **Security**
   a) Review if all workstations are being updated regularly for virus protection.
   b) Review if system firewall is regularly updated
   c) Review handling of hardcopy versions of client data.
   d) Review disposal procedures (hard and soft copy) of client data.
Client Rights:

3.0 Decision to Participate:

Policy:

Clients have the right to specify if their personal information from the Standardized Intake may be shared in the InHOUSE system. Clients can not be refused services if they choose not to share the Intake in InHOUSE.

Procedure:

A. Each participating agency/jurisdiction will post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. The language of the sign should read:

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

B. Each participating agency/jurisdiction will provide a copy of its Privacy Notice document to any individual upon request.

C. Clients will be informed both verbally and in writing about what information is being collected and how the information will be used.

D. Clients will be informed both verbally and in writing about their options for participation in InHOUSE.

E. Clients will initial on the “Client Release of Information Authorization” to acknowledge receipt of the “What is InHOUSE?” form following the verbal explanation. The “What is InHOUSE?” form will be given to the client.

F. If a client chooses to share Intake data, the client will sign the “Client Release of Information Authorization” form. This form must be “witnessed” in writing by an agency/jurisdiction representative.

G. If a Client chooses to not share Intake data, the “Consent” section of the “Client Release of Information Authorization” form is not signed. All collected data may be entered into InHOUSE, but must be secured appropriately to forbid any sharing. Client may not be denied services based on that choice.

H. Client information may only be searched for or entered in the InHOUSE system AFTER the client has been informed of data collection and use, the option for data sharing, and presented the “What is InHOUSE?” form.
1. Reasonable accommodations will be made with regards to the Privacy Notice, release of information forms and posted signs for persons with disabilities and non-English speaking clients as required by law.

3.1 Client Revisions to Participation:

Policy:

Clients have the right to specify when and how their personal information in the InHOUSE system may be changed. Clients may revoke, revise, and/or amend their levels of data sharing at any time during the course of service use. Clients may not be refused services if they choose to modify their participation in InHOUSE.

Procedure:

A. Each participating agency/jurisdiction will complete a new Release of Information authorization form each time a Client asks to share his/her data in InHOUSE.

B. Each participating agency/jurisdiction will complete a Revocation of Consent form each time a Client requests to no longer share data in InHOUSE.

C. Agency/jurisdiction will modify Client ROI in InHOUSE within one (1) business day in accordance with Client's revised authorization.
Client Rights:

3.2 Client Access to Personal Information:

Policy:

Clients have the right to inspect and to have a copy of their personal information which is stored in the InHOUSE system. Clients also have the right to request that information be corrected and/or updated.

Procedure:

A. Each participating agency/jurisdiction will, within five (5) workings days of request, allow the client to review their InHOUSE record.

B. At the reasonable written request of a client, each participating agency/jurisdiction will, within 5 working days, provide a printed “hard” copy of the client’s InHOUSE record.

C. The agency/jurisdiction must offer to explain any information that the client does not understand.

D. Each participating agency/jurisdiction must consider any request by a client for correction of inaccurate or incomplete personal information pertaining to that client.

E. An agency/jurisdiction is not required to remove any information but may mark information as client-identified as inaccurate or incomplete and may supplement data fields with additional information and/or explanations.

F. Each participating agency/jurisdiction must have in its Privacy Notice the specific conditions under which it may deny the inspection of or copying of a client’s record (upon that client’s request) in InHOUSE.
3.3 Filing Client Grievances:

Policy:

Clients have the right to file a grievance for denial of access to or correction of data in the InHOUSE system, or if they believe their specific written release of information consent for the InHOUSE system has been violated.

Procedure:
A. Client files a grievance as specified in the agency/jurisdiction Privacy Notice.
B. Agency/jurisdiction must review all grievances at all levels identified in the Privacy Notice.
C. If client is unsatisfied with the resolution at the agency level, the client may request mediation at the system level. Within five (5) working days, a copy of the grievance is sent to the CoC staff member of the InHOUSE Grievance and Security Committee, who notifies and convenes the committee to review the grievance.
D. The InHOUSE Grievance and Security Committee as identified in Section 10.1 meets within ten (10) working days and sends written decision to the agency/jurisdiction and the client.
InHOUSE License Administration:

4.0 Issuing of User Licenses:

Policy:

The InHOUSE System Administrator will issue all initial agency/jurisdiction user licenses for system users. The agency/jurisdiction Technical Administrator will administer user IDs and passwords for the eligible user at agency/jurisdiction site(s).

Procedure:

A. Upon completion of a signed User Agreement and Privacy and Security Certification, a system user will be eligible to be issued a license.

B. The InHOUSE System Administrator will allocate a user access license and privileges to the user prior to InHOUSE hands-on system training.

Passwords:

1) First-time, temporary passwords are automatically generated by the InHOUSE system when a user is created. This temporary password must be changed the first time the user logs onto the system.

2) InHOUSE User IDs and first-time, temporary passwords will be transmitted in two separate emails to the user.

3) NO SUBSEQUENT ELECTRONIC TRANSMISSION OF AUTHENTICATORS (PASSWORDS OR USER NAMES) MAY TAKE PLACE.

4) Passwords selected by users to replace the first-time, temporary password must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
   (a) Using at least one number and one letter;
   (b) Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and/or
   (c) Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

Additional Licenses:

1) If a participating agency/jurisdiction purchases additional user licenses to the InHOUSE system, the above outlined Procedures will be followed.

C. The agency/jurisdiction Technical Administrator will administer any changes in issued licenses and user IDs and passwords for eligible users at their site.
4.1 User Licenses:

Policy:

A User issued licensed access to the InHOUSE system may not share that access with any other person at any time. Sharing access is considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual.

4.2 Maintenance of User Licenses:

Policy:

Agency/jurisdictions’ InHOUSE Manager or Technical Administrator must notify the InHOUSE System Administrator upon termination or extended leave of absence of any licensed InHOUSE system user. User access will terminate at the end of business on their last day of employment or sooner if requested by the agency/jurisdiction InHOUSE Manager. If a licensed user is to go on leave for a period of longer than 45 days, their access will be inactivated within 5 business days of the start of their leave.

Procedure:

A. The agency/jurisdiction InHOUSE Manager or Technical Administrator will notify the InHOUSE System Administrator by both email and phone of any user termination or extended leave from employment in sufficient time to comply with the above stated policy.

B. Failure to make such notifications in the time required will be considered a breach of confidentiality and will be grounds for suspending and/or revoking access of the agency/jurisdiction to the InHOUSE system.

C. Such sanctions will be imposed by agency/jurisdiction and the Council’s Executive Committee.
Maintaining InHOUSE Security:

5.0 Tracking of Unauthorized Access:

Policy:

The agency/jurisdiction Technical Administrator will track system access logs and audit reports weekly. The Technical Administrator will immediately notify the agency/jurisdiction InHOUSE Manager and CoC staff of suspicious or inappropriate access.

Procedure:

A. Upon notification from the agency/jurisdiction Technical Administrator of suspicious or inappropriate access, the agency/jurisdiction InHOUSE Manager will investigate the specific situation and report back to the CoC staff in writing.

B. If an infraction of security did occur, the agency/jurisdiction InHOUSE Manager will provide CoC staff with a written plan for rectifying the infraction and monitoring against further such infractions.

C. Failure to respond to such CoC notification will result in downgrading of license access.

D. CoC staff will prepare a sample corrective plan showing a plan to rectify infractions and monitor against further infractions.
5.1 Unauthorized Remote Access:

Policy:

Access to the InHOUSE system is allowed only from authorized agency locations. Remote access (from an unauthorized agency location) to the InHOUSE system is not permitted under any circumstances. Such access is considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual. The InHOUSE System Administrator will monitor access of the InHOUSE system to ensure compliance with the access policy. Agencies/jurisdictions must monitor all staff to ensure such compliance.

Procedure:

A. In addition to the InHOUSE Privacy and Security Certification Training, the agency/jurisdiction shall make this policy and its consequences known to all licensed users.

B. If a breach of security occurs, the agency/jurisdiction InHOUSE Manager will provide CoC staff with a written notice and plan for rectifying the infraction and monitoring against further such infractions.

C. Agencies wishing to authorize remote workstations as a secure and compliant authorized agency location must submit a written request to the agency Technical Administrator who will physically inspect the remote workstation for security compliance as detailed in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice. If remote workstations comply with the security standards, the Technical Administrator will complete the Authorized Remote Access Form and submit it to the InHOUSE System Administrator.

D. An authorized remote site must be inspected by the Technical Administrator once a quarter to insure the firewall is functioning properly and the virus software is up to date. Each visit will be documented on an Authorized Remote Access Form and submitted to the InHOUSE System Administrator.

E. Council staff or its designee may monitor the remote access inspection records from the agency/jurisdiction or InHOUSE System Administrator.
Maintaining InHOUSE Security:

5.2 Downloading of Data from InHOUSE System:

Policy:

InHOUSE aggregate data for an agency or system-wide must not contain any PPI and therefore does not require the highest levels of protection reserved for PPI. However, this aggregate data should be limited to authorized use and disclosure.

Data containing PPI (non-aggregated data) must always be stored in binary, not text, format. Agency/Jurisdiction may download data. However, to comply with the binary format, if an agency/jurisdiction chooses to download its data, it must download to common database applications that use a binary format which include Microsoft Access, Microsoft SQL Server, Oracle, or other appropriate databases. No data containing PPI may be downloaded to any unauthorized remote access site at any time for any reason.

Agency/Jurisdiction must never download data for clients not in its programs.

Downloaded data that includes PPI may not be stored on any network drive accessible to anyone not trained through the InHOUSE Privacy and Security Training. If the data is stored on a portable medium (e.g. disks, CDs, tape), that medium must be securely stored when not in use and never left unattended in a public area. Such storage mediums may not be taken off site at any time for any reason.

Access to the downloaded data is restricted to persons successfully completing Privacy and Security Certification Training to maintain security standards.

Failure to follow this policy will be considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual. Agency/Jurisdiction is responsible for ensuring its data users’ compliance with this policy.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy, and train and monitor all users.
5.3 Deleting of Data Downloaded from InHOUSE System:

Policy:

In order to delete downloaded HMIS data containing PPI from a data storage medium, the agency/jurisdiction must reformat the storage medium a minimum of two (2) times before reusing or disposing of the medium. This is true for hard drives, floppy disks, zip drives/disks, tape backups, etc. To dispose of data stored on CDs, the CD must be physically destroyed.

If an agency/jurisdiction is not prepared to reformat a hard drive as specified to delete downloaded HMIS data containing PPI, the data should not be downloaded to that medium.

Procedure:
A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy, and train and monitor all agency/jurisdiction users.

5.4 Printing of Hard Copy Data:

Policy:

Hard copy data containing PPI may only be printed from the InHOUSE system at the physical agency/jurisdiction location(s) and only on printers secured from public access.
Maintaining InHOUSE Security:

5.5 Disposing of Hard Copy Data:

Policy:

An agency/jurisdiction is responsible for disposing of documents that contain PPI by shredding paper records.

Procedure:
A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy.
B. CoC staff and/or CoC/InHOUSE consultants will periodically review agency/jurisdiction compliance with this policy in the course of monitoring agency/jurisdiction compliance with privacy and security standards.

5.6 Reported Data:

Policy:

Only aggregated data not containing any PPI will be released or reported outside of the agency/jurisdiction that collected or has access to such information.

Procedure:
A. A participating agency/jurisdiction shall only release or report de-identified aggregate data that does not contain PPI.
B. Failure to comply with this policy will result in the downgrading or suspension of license access to the InHOUSE system.

5.7 Reporting Security Violations:

Policy:

If a security violation should occur, the agency/jurisdiction must notify the InHOUSE System Administrator and CoC staff of the violation within 24 hours by email and phone.

Procedure:
A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy.
B. Failure to comply with this policy will result in the downgrading or suspension of license access to the InHOUSE system.
5.8 Virus Protection on User Systems:

Policy:

Each agency/jurisdiction will take all necessary precautions to prevent any destructive or malicious program (virus) from being introduced into their system that is used to access the InHOUSE system. If a virus is introduced into the agency/jurisdiction system, the agency/jurisdiction must act rapidly to resolve the issue, including completing agency-/jurisdiction-wide security checks as appropriate.

Procedure:

A. A participating agency/jurisdiction shall adopt, if it has not previously, the following standards:
   1) Industry-recognized Anti-Virus software will be installed and maintained in all user workstations.
   2) No un-scanned media will be introduced to the system.
   3) No downloading of internet programs/files will be permitted, except for necessary software or operating system updates issues by the manufacturer.
   4) Individual workstation virus definitions will be updated weekly or more often when required.
   5) Virus protection on all servers will be updated regularly.
   6) System server(s) will be scanned daily.
   7) Spyware that is included with Anti-Virus or firewall software should be loaded for added protection.

B. If infection does occur, NO ACCESS TO THE InHOUSE SYSTEM WILL BE ALLOWED BY ANY USER UNTIL THE ENTIRE SYSTEM IS CLEANED AND DECLARED SECURE BY THE SYSTEM ADMINISTRATOR.
Maintaining Data Integrity:

6.0 Weekly Data Entry:

Policy:

Data entry by an agency/jurisdiction must take place, at minimum, on a weekly basis. Participating agencies/jurisdictions are responsible for assuring that the reportable HUD data is as complete and accurate as possible.

Procedure:

A. The Technical Administrator will run weekly custom reports to identify missing data elements required for HUD reporting.
B. The agency/jurisdiction will have established a procedure to address report results and enter missing data.

6.1 Monthly ROI Monitoring:

Policy:

A participating agency/jurisdiction will run a monthly report to identify upcoming ROI expiration dates for active client records in the InHOUSE system. Staff will make all reasonable efforts to obtain a new ROI and enter in the InHOUSE system prior to the expiration of the existing ROI.

Procedure:

A. The Technical Administrator will run a monthly report to identify active clients with an ROI expiring in the next month for all programs that operate at least three times per week except Shelter Plus Care.
B. The Technical Administrator for Shelter Plus Care and all programs operating less frequently than three times per week will run a monthly report to identify active clients with an ROI expiring in the next two months to allow ample time to secure renewal of ROI.
C. The agency/jurisdiction will have established a procedure to obtain new ROIs from these active clients and enter the new ROI information into the InHOUSE system prior to the expiration of the existing ROI.
6.2 Precediously Obtained Data without an ROI:

Policy:

If an agency/jurisdiction possesses a current ROI on an active client, historical data may be entered for the program year.

If no current ROI is possessed, agency/jurisdiction may enter client data and close it to others in limited circumstances with the set-up and permission from the System Administrator. Entry of such data needs to be completed correctly to minimize risk to the InHOUSE and secure other system data for HUD-mandated homeless counts.

Agency/jurisdiction is responsible for the costs of manual or electronic entry of historical data.

Procedure:

A. The System Administrator must approve all agency/jurisdictions seeking to enter historical data.

B. All staff designated to manually input or oversee input of historical data must successfully complete Additional User Training to learn proper techniques to accurately enter such data. Availability of the Additional User Training is subject to the System Administrator’s availability.

C. All agency/jurisdictions seeking to electronically transfer and upload historical data must partner with the System Administrator for guidance in mapping all data fields and other tasks required by the System Administrator to ensure an efficacious upload of data.
Training:

7.0 Privacy and Security Certification Training:

Policy:

Any agency/jurisdiction staff or designees conducting any intake, data entry, or other data processing functions must complete Privacy and Security Certification Training and become certified. Upon initial implementation of an agency/jurisdiction, Privacy and Security Certification Training will be provided by CoC staff. All subsequent Privacy and Security Certification Training of new agency/jurisdiction staff for the InHOUSE system will be completed by either attending a Council-sponsored Certification Training or by one-on-one training sessions conducted by the agency/jurisdiction's InHOUSE manager or Policy and Procedure Administrator using Alameda Countywide Homeless Continuum of Care Council-provided Training and Certification materials. The Council-sponsored Privacy and Security Certification Trainings, conducted by CoC staff, will occur regularly, and will be open to all new agency/jurisdiction staff.

Procedure:

A. Upon initial implementation, agency/jurisdiction will identify all relevant staff, volunteers, interns, and contractors who must complete Privacy and Security Certification training and submit the list of names to the System Administrator upon request.

B. CoC staff will schedule and provide Privacy and Security Certification training to all initial InHOUSE users and intake staff.

C. Upon completion of the Privacy and Security Certification Training, the Council will notify the Implementation Team Lead and agency executive director/jurisdictional lead staff of the certification status of its staff. Certification will be mailed for staff successfully completing the Privacy and Security Certification.

D. Staff who do not successfully complete the Certification (by failing to pass the Certification test) will be rescheduled into a future Privacy and Security Certification Training.

E. Upon completion of initial implementation, CoC staff will provide the agency/jurisdiction Policies and Procedures Administrator with a master set of training materials to be used (copied) for subsequent Privacy and Security Certification Training of new agency/jurisdiction staff.

F. CoC updates made to Privacy and Security Certification Training materials will be sent to the agency/jurisdiction Policies and Procedures Administrator.
E. The agency/jurisdiction Policies and Procedures Administrator must sign-off on the successful completion of Privacy and Security Certification Training for each new user trained by the agency/jurisdiction. The Policies and Procedures Administrator will provide verification to the InHOUSE System Administrator, including the names and contact information of all individuals who completed the Privacy and Security Certification Training, a completed Certification test, and a signed Privacy Agreement. Council staff will correct the test and complete the Certification before a user access license to the InHOUSE system will be issued.

F. The agency/jurisdiction Policies and Procedures Administrator must sign-off on the successful completion of any supplemental Privacy and Security Training conducted by the agency/jurisdiction for users and provide such verification to the InHOUSE System Administrator, including the names and contact information of all individuals who completed supplemental Privacy and Security Training.
### 7.1 ServicePoint User Training:

**Policy:**

Upon initial implementation of an agency/jurisdiction, CoC staff will provide ServicePoint User Training. All subsequent ServicePoint User Training of new agency/jurisdiction staff for the InHOUSE system will be completed by either attending a Council-sponsored ServicePoint User Training or by one-on-one training sessions conducted by the agency/jurisdiction's InHOUSE manager or Technical Administrator using Alameda Countywide Homeless Continuum of Care Council-provided User Training materials. The Council-sponsored ServicePoint User Trainings, conducted by CoC staff, will occur regularly, and will be open to all new agency/jurisdiction staff. In addition, the Council will convene future user trainings to address large system-wide topics, such as new ServicePoint modules or major software upgrades.

**Procedure:**

A. Upon initial implementation, agency/jurisdiction will identify relevant staff, volunteers, interns, and contractors who must complete ServicePoint User Training and submit the list of names to the System Administrator upon request.

B. CoC staff will schedule and provide ServicePoint User Training to all initial InHOUSE users.

C. Upon completion of initial implementation, CoC staff will provide the agency/jurisdiction Technical Administrator with a master set of training materials to be used (copied) for subsequent ServicePoint User Training of new agency/jurisdiction staff.

D. CoC updates made to ServicePoint User Training materials will be sent to the agency/jurisdiction Technical Administrator.

E. The agency/jurisdiction Technical Administrator must sign-off on the successful completion of ServicePoint User Training for each new user and provide such verification to the InHOUSE System Administrator before a user access license to the “live” InHOUSE system will be issued.
Training:

7.2 ServicePoint Technical Administrator Training:

Policy:

Upon initial implementation of an agency/jurisdiction, ServicePoint Technical Administrator training will be provided by CoC staff.

Should a change occur in the staffing of the Technical Administrator role at an agency/jurisdiction, the agency/jurisdiction InHOUSE Manager will confer with the InHOUSE System Administrator as to the plan for training the new Technical Administrator.

Procedure:

A. Upon determination of a change of Technical Administrator at an agency/jurisdiction, the agency/jurisdiction InHOUSE Manager will notify the InHOUSE System Administrator of the upcoming change. Together, they will determine the plan for training the new Technical Administrator.
Reporting:

8.0 Agency/Jurisdiction Reporting Technology Solutions:

Policy:

CoC staff and consultants will continue to secure appropriate reporting technology, software and training for InHOUSE partner agencies such that agency/jurisdiction can internally generate agency-specific and some system-wide reports.

8.1 Agency/Jurisdiction APR Reporting:

Policy:

An agency/jurisdiction can generate its own program’s APR reporting using the InHOUSE ServicePoint software.

8.2 Agency/Jurisdiction Custom Reporting:

Policy:

Agencies/jurisdictions are responsible for their own custom reporting of agency/program data. It is the goal of the CoC to provide additional custom reporting options to agencies and jurisdictions. CoC is currently awaiting the release of a new reporting solution by Bowman Internet System targeted for January 2005. Following the release of that product, CoC will evaluate its utility to agency/jurisdiction’s needs and either purchase that product or secure other software as a reporting solution. When the final reporting solution is identified, the InHOUSE System Administrator will provide the relevant information and training.
Reporting:

8.3 Reports for Collaboratives:

Policy:

A reporting solution for collaborative grants currently resides with the InHOUSE System Administrator who can prepare collaborative reports at the agency/jurisdiction’s request. Specific software solutions that will allow collaborative partners to generate reports themselves are in process, but are not available at this time.

8.4 System-wide Reporting:

Policy:

Until specific software solutions are available to enable participating agency/jurisdictions to generate aggregate system-wide reports, the Council will generate annual and periodic data for public use.
InHOUSE System Maintenance/Upgrades:

9.0 Upgrading ServicePoint Software:

Policy:

Periodically it will be necessary to upgrade ServicePoint software. This upgrade will be done by Bowman Internet Systems, the software vendor. The InHOUSE System Administrator will coordinate system upgrades with Bowman Systems and make the necessary notifications to all participating users.

Procedure:

A. System software upgrades will be scheduled in advance and notification will be made to all participating users via the ServicePoint System News and notification to agency/jurisdiction Technical Administrators. Every effort will be made to minimize system downtime.
InHOUSE System Governance and CoC Roles and Responsibilities:

10.0 System Governance and Oversight:

Policy:

The Executive Committee of the Alameda Countywide Homeless Continuum of Care Council will provide system governance and oversight of policies, procedures, and significant concerns about the InHOUSE system. Issues affecting the entire user system or large population segments will be vetted in appropriate community-wide forums which may include Council meetings, focus groups, or public comments periods.

Procedure:

A. CoC Council staff and consultants will identify the most appropriate forum from which to solicit comment and input about policy decisions and implementation documents.

B. Staff will publicize and invite relevant parties and specify the scope of conversation/comments and the length of the comment period.

C. Revisions of this Policy and Procedures document may be necessary from time to time. Supplemental and/or replacement pages may be distributed. A full community-wide review and revision will occur in July 2006 and periodically thereafter.

D. The Executive Committee of the Council will approve revisions to the Policies and Procedures contained in this document, this document as amended, and any other documents that establish policy.

E. Appeals to published policies and procedures after the comment period may be made by any party to the Executive Committee of the Council. Appeals must be in writing and will then be scheduled for review by the Executive Committee or a special committee of the Executive Committee.
10.1 InHOUSE System Grievance and Security Committee:

Policy:

An InHOUSE System Grievance and Security Committee will be created and meet as needed to address reported agency/jurisdiction client grievances and reported/suspected system security violations. Client grievances that will be considered by this committee are limited to denial of access to or correction of data in the InHOUSE system, or violations of their specific written release of information consent for the InHOUSE system. The committee will consist of CoC Staff, and uninvolved non-conflicted Jurisdiction Staff, and uninvolved non-conflicted Agency staff that are members of or appointed to the CoC Executive Committee. A Consumer will also participate when available.

Procedure:

A. In the case of reported/suspected security violations, a formal letter will be sent to the license holder (with copies to the agency/jurisdiction InHOUSE Manager, Policies and Procedures Administrator and Technical Administrator) detailing the reported violation and requesting corrective action.

B. Written notification of corrective action, detailing the plan for rectifying the security violation, must be sent from the agency/jurisdiction InHOUSE Manager or Policies and Procedures Administrator to designated CoC Staff or InHOUSE System Administrator.

C. The plan must include monitoring as part of the corrective action.

D. Failure to comply with the plan will result in downgrading of license access, and possible suspension or revocation of licenses.

E. Failure to respond to a notification by the InHOUSE System Grievance and Security Committee within 10 working days will result in downgrading of license access, suspension or revocation of licenses.

F. Eligible client grievances will only be considered following completion of the entire agency/jurisdiction grievance process.
InHOUSE System Governance and CoC Roles and Responsibilities:

10.2 Right to Deny Access:

Policy:

The access of a participating agency/jurisdiction and/or user(s) may be suspended for suspected violation of security protocols. The access of a participating agency/jurisdiction and/or user(s) may be suspended or revoked for actual violation of security protocols.

10.3 CoC Roles and Responsibilities:

Executive Committee
The Executive Committee will provide oversight and governance, including financial oversight, and ensure that InHOUSE (including Phase 1 and Phase 2) is implemented in a manner consistent with the vision established in the HMIS Planning Committee.

1. Approve annual budget for InHOUSE, including staffing.
2. Approve the annual InHOUSE workplan, including scheduling for implementation.
3. Approve contracts and principal documents.
4. Receive and review monthly written financial reports.
5. Receive and review monthly written reports on progress and issues.

Stakeholder Community
The Stakeholder Community will provide input to community-wide or population-specific policy level decisions affecting the full implementation.

1. Receive regular e-mail updates on InHOUSE developments, major issues, implementation schedule and progress.
2. Provide input through email/mail reviews of InHOUSE documents and implementation process.
3. Participate in forums as requested.
**CoC Staff**

The CoC staff and/or project-based consultants will manage and oversee the entire InHOUSE implementation and on-going operations.

1. Prepare annual InHOUSE budget for Executive Committee approval.
2. Prepare the annual InHOUSE work plan.
3. Prepare contracts and documents.
4. Prepare monthly written financial reports.
5. Prepare monthly written reports on progress and issues and annual reports including budget, project status, and work plan.
6. Distribute InHOUSE documents and implementation processes for review.
7. Arrange and staff regular HMIS forums.
8. Develop InHOUSE configuration, implement and operate the InHOUSE system on a day-to-day basis, including providing training and technical assistance.
9. Maintain relationship with the software vendor, negotiate any contractual changes and provide significant input on proposed software solutions.
10. Work with participating agencies.
11. Work with the federal Department of Housing and Urban Development (HUD) to ensure InHOUSE meets all relevant federal mandates and is in accordance with HUD HMIS priorities.
12. Work with and coordinate with Bay Area Counties and other HMIS interested groups.
InHOUSE System Governance and CoC Roles and Responsibilities:

10.3 CoC Roles and Responsibilities: (continued)

InHOUSE System Administrator
The InHOUSE System Administrator will manage the day-to-day software application, oversee the agency-specific implementation and compliance, and liaison between the agency/hierarchy and the software vendor.

1. Perform initial agency setup and configuration within the system.

2. Administer and manage user accounts, logins and passwords for local agency administrators.

3. Update training modules (including training materials) for agency administrators.

4. Provide technical assistance within the continuum and facilitate trouble-shooting and problem resolution.

5. Perform data quality review on an ongoing basis.

6. Review and monitor across user agencies to ensure security, confidentiality and quality of the information within the system and adherence to standard policy and procedures.

7. Coordinate and manage all system upgrades with the software vendor and users.

8. Create and run all required custom and collaborative reports.

9. Liaison with system software vendor to resolve technical issues.
Work Flow Procedures:

11.0 Data Element Definitions:

A few key data elements are defined because no definition exists from HUD and the element is critical within the system of care locally.

Definitions:

A. The following is the proposed definition for “earned Income” within the InHOUSE HMIS system. When more rigid standards apply for a specific funding stream, particularly for employment programs, the more rigid standard shall supercede this definition and apply for that program or programs.

Earned Income
Earned income is verifiable financial compensation that is received in exchange for someone’s time and labor, regardless of duration, permanency, or subsidized or transitional nature of the relationship. This includes:

- Full Time Employment - A job in which an employee works thirty-five (35) or more (usually 40) hours during a typical workweek.
- Part Time Employment - A job in which an employee works between 1 to 34 hours during a typical workweek.
- Temporary Employment - A job that lasts for a limited time whereby an employee generally works less than a year on one assignment, regardless of the number of hours worked per week.
- Day Labor - A job in which an employee is hired and paid one day at a time, with no promise that more work will be available in the future.

Verifiable: Able to be confidently validated through means such as copy of a check stub, a payment voucher, letter of hire, or conversation with an employer. While not all programs require the verification of earned income, in order to be counted as earned income, the source must be able to be verified.

Financial: cash or other legal tender such as checks. This does NOT include barter-like arrangements where cash or other legal tender is not exchanged. For example, an arrangement where a client works in exchange for room, utilities, and/or meals can not be counted as a financial compensation since no cash exchange is made between the two parties.

Regardless of duration, permanency, or subsidized or transitional nature: Determining earned income is not dependant on whether the individual has worked a specified number of days; whether the employment is seasonal, temporary, or permanent; or whether the job is a supported employment opportunity or subsidized in any way. This is the biggest variant from other “employment” or “earned income” definitions in other programs.
B. **Other Income**

Other income not meeting the above definition can be reported as income in the “other” category with the specific source and amount identified on the Intake and in InHOUSE. This may include panhandling, recycling, live-in barter or “work for rent” arrangements, and other informal activities.

11.1 Client Search Prior to Intake:

**Policy:**

Prior to conducting an Intake for a new program entry, staff of each participating agency/jurisdiction will obtain and print the most current Basic Intake or Basic Eligibility information (if available) for each client. Agency/jurisdiction staff will verify the information and then conduct the remaining Intake questions with the client.

**Procedure:**

A. Staff of each participating agency/jurisdiction will, prior to conducting an intake, log into InHOUSE and search for the client.

B. Upon locating the specific client, the agency/jurisdiction will print the Basic Intake or Basic Eligibility for the client.

C. The agency/jurisdiction staff will then review the printed details with the client to insure accuracy and complete any unanswered questions.

D. The agency/jurisdiction staff will then complete the remaining Intake sections or forms for each new Intake.

E. Should the client not be found to exist within InHOUSE, the agency/jurisdiction staff would conduct a complete Intake set.

11.2 Entry Procedures:

**Policy:**

Every household member receiving any type of service (e.g., a meal, a bed, any type of counseling, medical services, housing, or any other service) must have a completed intake and be entered into the InHOUSE system.

**Procedure:**

First ask the question as printed on the Intake form. If the client is unsure of what is being asked, restate the question, as needed, to insure understanding.
11.3 Update Procedures:

Housing Assessment Policy:

Every housing change for a household must be recorded and entered into InHOUSE.

Procedure:

A. A Housing Assessment form will be completed by agency/jurisdictions staff each time a household moves in or out of permanent housing.
B. Data from the form will be entered into InHOUSE.
C. Data entry will follow the InHOUSE Policy and Procedure expectation of once per week.

Annual Update Policy:

Every client that is in a program one year or longer must have his/her record annually updated with information prescribed by HUD and this community, which minimally includes income, non-cash benefits, and disabilities. A Housing Assessment update will also be completed on the Head of Household’s record (if applicable).

Procedure:

A. Each agency/jurisdiction will run the Annual Update Report (ART) to generate a list of clients in need of an Annual Update. Clients will appear on the ART report if they have not had a new program entry or update (by any other agency) within the last twelve months.
B. Each agency/jurisdiction will complete a new Release of Information (v. 5.1) and Annual Update for each client who appears on the Annual Update Report. The Annual Update will be completed annually for each client.
D. The agency/jurisdiction will enter an Annual Update service, in InHOUSE, on the Head of Household’s record. When entering the service, also select any other family members that received the service at the same time as the Head of Household.
E. The Annual Update service will be entered for the program that performed the Annual Update and/or collected the data.
11.4 Exit Procedures:

Policy:

Persons will be exited from Outreach and Drop In Center programs when:

- the person moves to any location where the program will not continue working with the individual, such as a residential treatment program, jail, permanent housing, or some shelter situations where the program does not continue working with the individual, OR
- the person has had no contact within the prior six months.

Approved: Performance Management Committee, Oct. 2010

Procedure:

A. Identify the last date of contact with a client. Reports in InHOUSE HMIS can help identify the date of last contact if services are being entered.

B. Administratively complete the exit form utilizing the most recent data in the case file, client records, or from client interview.

C. Date the exit back to the date of last contact and complete the correct data entry procedures for exiting a client from a program.

D. For the best data quality, at every contact, attempt to update someone’s housing situation and income in the case notes so that at exit to the last date of contact, the case notes will reflect the person’s housing and income situations at the time. This will most accurately reflect the person’s situation and will also mitigate numerous “unknown” and “refused” responses at exit.

11.5 Exit Dates:

Policy:

The exit must be dated back to the date of last contact for every client exit.
Appendices:

Appendix A - Agency/Jurisdiction Participant Agreement (MOU)

Appendix B - Privacy Agreement

Appendix C - User Agreement

Appendix D - HUD Final Data Standards

Appendix E - HUD HMIS Privacy and Security Standards - Summary

Appendix F - Sample Privacy Notice

Appendix G - Client Release of Information Authorization

Appendix H - HUD HMIS Required Data Elements List

Appendix I - Glossary
Appendices:

Appendix A – InHOUSE Partner MOU
Appendix B – Privacy Agreement
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Appendix D – HUD Final Data Standards
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Appendix F – Sample Privacy Notice
Appendix G – Client Release of Information Authorization
Appendix H – HUD HMIS Required Data Elements List
Appendix I – Glossary
Appendix A

InHOUSE Partner MOU
The Alameda Countywide Homeless Management Information System (HMIS) known as InHOUSE is an information system that maintains information regarding the characteristics and service needs of Clients. InHOUSE will facilitate more effective and streamlined services to Clients and create information that communities can use to determine the use and effectiveness of services.

The InHOUSE system is designed to benefit multiple stakeholders, including persons using homeless-targeted services, provider agencies, jurisdictions, other systems of care, funders and the community. Improved knowledge gained from InHOUSE about various communities with special needs and their service usage will lead to a more effective and efficient service delivery system.

The Alameda Countywide Homeless Continuum of Care Council (Council) has been designated through a broad community planning process to oversee the planning, funding, implementation and on-going operation of the InHOUSE system.

__________________________________________ ("Agency" or “Jurisdiction”) has elected to participate in the InHOUSE system.

Agency/Jurisdiction and Alameda Countywide Homeless Continuum of Care Council agree as follows:

1. **General Understandings:**

   a. In this Agreement, the following terms will have the following meanings:

      (i) "Client" refers to a consumer of services.

      (ii) "Agency" or “Agency/Jurisdiction” refers generally to any Agency or Jurisdiction participating in the InHOUSE system in accordance with a current InHOUSE Partner Memorandum Of Understanding.

      (iii) "Agency staff” refers to paid employees, volunteers, affiliates, contractors, and associates of Agencies and Jurisdictions using InHOUSE.

      (iv) “Council staff” refers to the Council Coordinator, other Council employees, volunteers, affiliates, contractors, and associates performing tasks pertaining to InHOUSE on behalf of the Council.

      (v) “InHOUSE” refers to Information about Homelessness, Outcomes and Service Engagement, the Alameda Countywide HMIS.

      (vi) “Enter(ing)” or “entry” refers to the input of any Client information into InHOUSE.

      (vii) “Share(ing)” or “Information Share(ing)” refers to the sharing of basic Intake information which has been entered in InHOUSE with another Partner Agency/Jurisdiction.

      (viii) “Executive Committee” refers to the Alameda Countywide Homeless Continuum of Care Council’s governing body responsible for advising about and overseeing the implementation and operation of the InHOUSE HMIS. The Executive Committee is composed of representatives from Alameda Countywide Homeless Continuum of Care Council, other stakeholders, and subject-specific members. A list of the current members of the Executive Committee is available from the Council Coordinator.
Alameda Countywide HMIS

InHOUSE: Information about Homelessness, Outcomes, and Service Engagement

(i) "Identified or Confidential Data" refers to Client data containing Protected Personal Identifiers that can be used to identify a specific Client.

(ii) "Deidentified Data" refers to data that has Client-specific information removed, allowing use of the data without identifying a specific Client. Also referred to as "non-identifying" or "aggregate" information.

b. Agency/Jurisdiction understands that when it enters information into InHOUSE, such information will be available to the Council staff or contractors who may review the data to administer InHOUSE; to conduct analysis; and to prepare reports which may be submitted to others in de-identified aggregate form without individual identifying Client information.

c. Agency/Jurisdiction understands that Client will have the ability to indicate whether basic Intake information Agency/Jurisdiction entered into InHOUSE may be shared with and accessible to Partner Agencies/Jurisdictions in the InHOUSE system. Agency/Jurisdiction is responsible for designating within InHOUSE, according to Client's desire, whether Intake information may or may not be shared.

d. Correspondence with other communities about the InHOUSE system or the Countywide HMIS will be directed to and originate from the Continuum of Care Coordinator.

2. Supplemental Documents:

Three additional documents further lay out expectations and agreements among the parties using the InHOUSE system. These include the InHOUSE Policies and Procedures Manual, the InHOUSE User Agreement, and the Privacy Agreement. These documents are distinct yet supplemental to this agreement to allow updating of said documents from time to time according to the system governance guidelines in the Policies and Procedure Manual.

a. **InHOUSE Policies and Procedures Manual** details the policy and implementation steps for roles and responsibilities, privacy requirements, notification of privacy protections, access privileges, breach of confidentiality and/or security, client rights, maintenance of system security and data integrity, training requirements, reporting of data, and system governance.

b. **InHOUSE User Agreement** specifically details the obligations and responsibilities of each User of the InHOUSE system. Each InHOUSE User must agree to abide by and sign the User Agreement.

c. **Privacy Agreement** details the obligations and responsibilities of each person who collects data for and/or utilizes sensitive data generated from InHOUSE. Anyone who collects data for or works with data generated by the InHOUSE system that contains Protected Personal Identifiers must agree to abide by and sign the Privacy Agreement.

Agency/Jurisdiction and Council staff will abide by the InHOUSE Policies and Procedure Manual, the InHOUSE User Agreement, and the Privacy Agreement at all times. Agency/Jurisdiction will monitor its staff in such a way as to reasonably insure compliance with the Policies and Procedure Manual, the User Agreement, and the Privacy Agreement by its entire staff.
4. **Additional Confidentiality Protections:**
   a. The Agency/Jurisdiction will uphold applicable federal and state confidentiality regulations and laws that protect Client records.
   
   b. The Agency/Jurisdiction shall only release client records with signed consent by the client or in accordance with applicable law.
   
   c. Parties to this Agreement will not share medical, HIV/AIDS, mental health, substance use, details about a disability, or any violence-related information without a separate written consent by the client for the release of such information.
   
   d. The Agency/Jurisdiction shall verbally explain to a Client about the InHOUSE database and the terms of consent and shall arrange for a qualified interpreter or translator in the event that Client is not literate in English or has difficulty understanding the consent form.

5. **Storage of Data:**
The Agency/Jurisdiction understands the file server, which will contain all Client information, including encrypted identifying Client information, will be located at Bowman Internet System, Inc. offices at 400 Travis Street, Suite 1900, Shreveport, LA 71101.

6. **Readiness for Implementation and Use of InHOUSE:**
Agency/Jurisdiction must complete specific tasks listed below for implementation of InHOUSE. The primary readiness tasks are noted below. Council staff must verify completion of all Readiness tasks. Failure to complete all readiness tasks at Agency/Jurisdiction may result in delay of the implementation.

   a. **Technological Readiness Assessment:** Agency/jurisdiction will correct all mandatory findings identified in their Technological Readiness Assessment.
   
   b. **Privacy Notice:** Agency/Jurisdiction must create or adapt an existing privacy notice detailing the Use and Disclosure of Client data within InHOUSE.
   
   c. **Workflow Document:** Agency/Jurisdiction must produce a Workflow Document as detailed by Council Staff.
   
   d. **Privacy and Security Certification Training:** All Agency/Jurisdiction staff that conduct Intake functions or handle data containing Protected Personal Identifiers must successfully complete the InHOUSE Privacy and Security Certification Training before conducting Intakes (including paper-based forms) for InHOUSE or handling such data.
   
   e. **ServicePoint User Training:** All users of the InHOUSE system must complete an InHOUSE ServicePoint User Training (after completing the Privacy and Security Certification Training) before being given access to a User license.
   
   f. **Agency/Jurisdiction-specific Set-up Information:** Agency/Jurisdiction will complete all programmatic diagramming, selection of picklists, identification of custom data fields, and other items as requested by the System Administrator in order to be set up in the software.
7. **No Conditioning of Services:**
Agency/Jurisdiction will not make sharing of Client Intake information in InHOUSE a condition for receiving any services.

8. **Restrictions on Release of Information from InHOUSE:**
Agency/Jurisdiction agrees not to release any Client identifying information received from InHOUSE to any other person or organization without written informed Client consent, or as required by law.

9. **Availability and Assistance:**
   a. All requests for troubleshooting or other assistance regarding the software or system utilization shall be directed to the Council’s InHOUSE System Administrator.
   
   b. InHOUSE staff will be reasonably available during the Council’s weekday business hours for technical assistance (i.e. troubleshooting and report generation).
   
   c. Requests for assistance will be addressed within two working days from receipt of the request. Concerns, complaints, or other communication about the competency and/or responsiveness of InHOUSE staff shall be directed to the Council Coordinator.
   
   d. Partner Agency/Jurisdiction shall not direct any inquiries directly to the software vendor.

10. **Records:**
Agency/Jurisdiction and the Council will maintain records of any disclosures of Client identifying information for a period of three years after such disclosure. Upon written request of a Client, Agency/Jurisdiction and Council staff will provide an accounting of all such disclosures within the prior three-year period. The Council will have access to an audit trail from InHOUSE to produce an accounting of disclosures made from one Agency/Jurisdiction to another.

11. **Use of InHOUSE:**
   a. Agency/Jurisdiction and Council Staff will use InHOUSE for its legitimate business purposes only.
   
   b. The Agency/Jurisdiction shall use Client information in the InHOUSE system, as provided to the Agency/Jurisdiction, to assist the Agency/Jurisdiction in providing adequate and appropriate services to the Client.
   
   c. Agency/Jurisdiction and its staff will not access identifying information for any individual for whom services are neither sought nor provided by the Agency/Jurisdiction. Agency/Jurisdiction may access identifying information for its Clients and may request access to statistical, non-identifying information on both its Clients and Clients served by other InHOUSE participating agencies.
   
   d. The transmission of material in violation of any federal or state regulations is prohibited. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
alameda countywide HMIS

InHouse Partner MOU

InHouse: Information about Homelessness, Outcomes, and Service Engagement

e. Agency/Jurisdiction will not use InHouse with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

12. Fee:

a. The Alameda Countywide Homeless Continuum of Care Council will cover the majority of Agency/Jurisdiction-specific costs (e.g. licenses) and system administration costs (e.g. InHouse staff) beginning July 1, 2005.

b. Agency/Jurisdiction is responsible for costs associated with connectivity to the internet, hardware that is compliant with software, privacy and security requirements, staff time for InHouse training activities, and staff data entry time.

c. While the Council has every intention of maintaining this funding arrangement, the Council reserves the right to charge the Agency/Jurisdiction fees to cover funding shortfalls and/or agency/jurisdiction-specific costs in excess of planned allocations.

d. Any fees not specific to an Agency/Jurisdiction requiring support in excess of planned allocations will be proposed by the Executive Committee of the Council, presented to the InHouse partners for comments, and adopted by the Executive Committee following review of partner feedback and InHouse financials. Agency/Jurisdiction will have sufficient time to identify appropriate resources.

13. Damage to InHouse:
Agency/Jurisdiction shall take due diligence not to cause in any manner, or way, corruption of InHouse, and Agency/Jurisdiction agrees to be responsible for any damage it may cause.

14. Community Stakeholders:
Council Staff will consult with the Council, Partner Agencies/Jurisdictions, and other stakeholders from time to time regarding community-wide issues such as revision to policy, procedures, and forms.

15. Grievance:
Written Agency/Jurisdiction complaints that are not resolved within the Agency/Jurisdiction may be forwarded to the InHouse Grievance and Security Committee of the Executive Committee, which will try to reach a voluntary resolution of the complaint.

16. Limitation of Liability and Indemnification:

a. No party to this Agreement shall assume any additional liability of any kind due to its execution of this Agreement. The parties intend that each party shall remain liable, to the extent provided by law, regarding its own acts and omissions, but that no party shall assume additional liability on its own behalf or liability for the acts of any other person or entity except for the acts and omissions of their own employees, volunteers, agents or contractors through participation in InHouse. The parties specifically agree that this agreement is for the benefit of the parties only and this agreement creates no rights in any third party.

b. To the fullest extent permitted by law, Agency/Jurisdiction agrees to indemnify, defend, and hold Alameda Countywide Homeless Continuum of Care Council, its agents, officials, and staff harmless from and against any and all claims, losses, damages, liabilities, and expenses, including legal fees and disbursements paid or incurred, arising from any breach of this Agreement or any of Agency/Jurisdiction’s obligations under this Agreement.
c. To the fullest extent permitted by law, Alameda Countywide Homeless Continuum of Care Council agrees to indemnify, defend, and hold Agency/Jurisdiction, its agents, officials, and staff harmless from and against any and all claims, losses, damages, liabilities, and expenses, including legal fees and disbursements paid or incurred, arising form any breach of this Agreement or any of Agency/Jurisdiction's obligations under this Agreement.

d. The Alameda Countywide Homeless Continuum of Care Council shall not be held liable to any member Agency/Jurisdiction for any cessation, delay or interruption of hosting or software services, nor for any malfunction of hardware, software or equipment. Liability and complaints regarding the Council’s responsiveness to technical assistance requests shall be directed to the Executive Committee.

17. Additional Terms and Conditions:

a. Agency/Jurisdiction will abide by such rules and regulations promulgated by HUD and/or the Council and/or the Executive Committee regarding administration of InHOUSE.

b. Agency/Jurisdiction and Council intend to abide by applicable law. Should any term of this Agreement be inconsistent with applicable law, or should additional terms be required by applicable law, Agency/Jurisdiction and Council agree to modify the terms of this agreement so as to comply with applicable law. No such change to particular sections will impact the validity or standing of other parts of the Agreement.

c. Neither Council nor Agency/Jurisdiction will transfer or assign any rights or obligations regarding Alameda Countywide HMIS without the written consent of either party.

18. Termination:
This Agreement will be in force until terminated by either party. Either party may terminate this agreement at will with 60 day written notice. Either party may terminate this agreement immediately upon a material breach of this Agreement by the other party, including but not limited to the breach of InHOUSE security or confidentiality by Agency/Jurisdiction. Exercising termination rights may affect Agency/Jurisdiction’s eligibility for federal funding including those that are locally administered (e.g. SHP, ESG, CDBG, CSBG, and HOPWA).

d. If this Agreement is terminated, Agency/Jurisdiction will no longer have access to InHOUSE. Council and the remaining Partner Agencies/Jurisdictions will maintain their right to use all of the Client information previously entered by Agency/Jurisdiction except to the extent a restriction is imposed by Client or law.

e. Upon termination, Council will notify representatives of the jurisdiction(s) in which the Agency/Jurisdiction provides services.

f. If this Agreement is terminated, the Council and remaining Partner Agencies/Jurisdictions shall maintain their right to use all Client data previously entered by the terminating Partner Agency/Jurisdiction; this use is subject to any restrictions requested by the Client and by the Policies and Procedures Manual.

g. Upon termination, copies of Agency/Jurisdiction data will be provided to the Agency/Jurisdiction. Data will be provided on CDs or other mutually agreed-upon media.
h. Unless otherwise specified in writing, copies of data will be delivered to Agency/Jurisdiction within twenty-one (21) calendar days of receipt of written requests for data copies.

i. If termination is being pursued by the Council due to breach of contract, Agency/Jurisdiction will receive notice of breach and have the right to address and correct said breach. Only in the absence of appropriate and reasonable intervention and resolution by Agency/Jurisdiction will termination of Agency/Jurisdiction participation be completed by Council.

Signed,

__________________________________________  ____________________
Signature of Executive Director/Manager         Date

__________________________________________
Print Executive Director/Manager Name

__________________________________________
Agency/Jurisdiction Name

__________________________________________  ____________________  _____
Street and/or Mailing Address                   City                State    Zip Code

__________________________________________  ____________________
Signature of Alameda County Housing and        Date
Community Development Department Director
Linda M. Gardner

__________________________________________  ____________________
Signature of Council Coordinator               Date
Megan H. Schatz
Appendix B

Privacy Agreement
Information about Homelessness, OUTcomes and Service Engagement
...the Alameda Countywide Homeless Management Information System

InHOUSE Privacy Agreement

While I am not currently a licensed user of the Alameda County InHOUSE system, I am collecting HUD mandated data for entry into that system and/or utilizing collected data that contains sensitive personal information about clients. As a data collection participant, I agree to uphold the confidentiality and privacy standards set forth in this document, excerpted from the HUD HMIS Standards and the Alameda County-wide InHOUSE Policies and Procedures Manual.

Please initial each statement below to indicate your agreement:

_____ I recognize I have access to confidential client information collected for the InHOUSE system.

_____ I recognize that I am bound to keep confidential all protected personal information with which I come in contact in the course of carrying out my job responsibilities.

_____ I recognize that the improper disclosure of confidential and protected personal information, by anyone, could result in violation of the laws, violation of a client's legal rights and could jeopardize the security of the InHOUSE system.

_____ I recognize that any improper disclosure or violation of confidential or protected information may result in disciplinary action and/or termination from any contracts/agreements with the Alameda County-wide Continuum of Care Council with which my employer may be associated, and possible termination of my employment.

_____ I agree to make no disclosure, except to authorized agency staff as necessary to the performance of my job duties, to anyone of any data in, to go in, or from the InHOUSE system.

_____ I will not solicit information from Clients unless the information is required for a legitimate business purpose such as to provide services to the Client.

_____ I will not decline services to a Client or potential Client if that person refuses to share their personal information with other agencies via InHOUSE.

_____ Upon Client written request, I will ensure a Client receives a copy of the Client's own information maintained within InHOUSE. Information compiled in reasonable anticipation of or for use in a civil, criminal or administrative action or proceeding need not be provided to Client.

_____ I will permit Clients to file a written complaint regarding the use or treatment of their information within InHOUSE. Client may file a written complaint within the Agency Grievance Procedure. Client may not be retaliated against for filing a complaint.

_____ I understand that all InHOUSE information (hard copies and soft copies) must be kept secure and confidential at all times. When no longer needed, the information must be destroyed according to written Policy and Procedures to maintain confidentiality.

I understand and agree to comply with all the confidentiality statements listed above. I agree to maintain strict confidentiality of information obtained for the InHOUSE system. This information will be used only for the legitimate client service and administration of the agency named below.

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<thead>
<tr>
<th>InHOUSE Participant Signature</th>
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<th>Agency/System Administrator</th>
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Appendix C

User Agreement
Information about Homelessness, Outcomes and Service Engagement
...the Alameda Countywide Homeless Management Information System

InHOUSE USER AGREEMENT

POLICY, RESPONSIBILITIES, & CODE OF ETHICS

USER POLICY

The Alameda Countywide Homeless Management Information System named InHOUSE (Information about Homelessness, Outcomes and Service Engagement), is a collaborative project that will enable homeless service providers to collect uniform client information over time. Participating Agencies in the InHOUSE system shall share information for provision of services to homeless persons through a networked infrastructure that establishes electronic communication among the Participating Agencies. This system is essential to efforts that streamline client services, continually improve the quality of homeless and housing services, and inform public policy. Through InHOUSE, homeless clients benefit from reduced intake processes, improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through InHOUSE is critical to accurately estimate the size, characteristics, and needs of the homeless population to inform service and systems planning, funding and advocacy.

The Client and his/her needs are a primary consideration in the design and management of the Alameda Countywide InHOUSE system. This includes the need to vigilantly maintain client confidentiality and treat personal data with significant respect and care. As the guardians entrusted with this personal data, InHOUSE users have a moral and legal obligation to ensure that the data they collect is being collected, accessed and used appropriately. It is also the responsibility of each user to ensure that client data uses and benefits are made explicitly clear to service users, and only used to those ends for which it was collected. Proper user training, adherence to the InHOUSE Policies and Procedures, and strict protection of client confidentiality are vital to the overall InHOUSE system. The InHOUSE system is a tool to assist agencies in focusing services and locating alternative resources to help homeless persons. Therefore, agency staff should use the Client information in InHOUSE to target services to the Client's needs.

The Client Release of Information Authorization form must be signed by Client before any information that identifies the Client (name, social security number, etc.) is searched for or entered into InHOUSE in a shared portion of the database. For each new Client, User shall insure that prior to obtaining Client's signature, the What is InHOUSE? and Client Release of Information Authorization forms were fully reviewed with Client such that the Client fully understood the information.

Partner Agencies shall have rights to data in InHOUSE pertaining to their clients that was created or entered by them. Partner Agencies shall be bound by all restrictions imposed by clients, privacy and security policies, and applicable laws pertaining to the use of personal data.

Minimum data entry for each Client will include:
- Completing the section(s) containing the HUD data elements

Data necessary for the development of aggregate reports of homeless services, including Annual Progress Reports, service needs, services provided, referrals and Client goals and outcomes will require data entry for all of the InHOUSE data sets and relevant forms including but not limited to the Standardized Intake, Program Entry/Exit, and Custom Assessment forms.
USER RESPONSIBILITY

User must be prepared to answer Client questions regarding the InHOUSE system.

User must faithfully respect Client preferences with regard to the entry of Client information within InHOUSE.

User must accurately record Client's preferences by making the proper designations for sharing of Client information and/or any restrictions on the sharing of Client information.

User must allow Client to change his or her information sharing preferences at the Client's request.

User must not decline services to a Client or potential Client if that person refuses to share the Intake information with other agencies via InHOUSE.

The User has primary responsibility for information entered by the User. Information entered by User must be truthful, accurate and complete to the best of User's knowledge.

User will not solicit from or enter information about Clients into InHOUSE unless the information is required for a legitimate business purpose such as to provide services to the Client.

Users will not alter or delete information entered by another Agency.

User will not use the InHOUSE database for any violation of any law, to defraud any entity or conduct any illegal activity.

Upon Client written request, User must allow a Client to inspect and obtain a copy of the Client's own information maintained within InHOUSE. Information requested by the Client to be compiled in reasonable anticipation of or for use in a civil, criminal or administrative action or proceeding need not be provided to Client.

User must permit Clients to file a written complaint regarding the use or treatment of their information within InHOUSE. Client may file a written complaint within the Agency/Jurisdiction Grievance Procedure. Client may not be retaliated against for filing a complaint.

The protection of confidentiality is critically important in the InHOUSE system. Your User ID and Password give you access to the InHOUSE system and must not be disclosed or shared.

Initial each item below to indicate your understanding and acceptance of the confidentiality protection measures and the proper use of your User ID and password. Failure to uphold the confidentiality standards set forth below is grounds for downgrading your access, immediate termination from the InHOUSE system, and/or potential termination from employment.

I understand that an InHOUSE Privacy and Security Certification training must be successfully completed before I administer Intake and Release of Authorization Forms.

I must successfully complete a ServicePoint User Training before I receive my username and password to the InHOUSE system.

I have read and will abide by all the InHOUSE Policies and Procedures.

I understand that my User ID and Password are for my use only and must not be shared with anyone, including other staff members.
I must take all reasonable measures to keep my Password physically secure.

I understand that my User ID and Password will terminate should I move employment and will not be passed on to the new staff member or transferred to my new employer.

I understand that the Client Release of Information Authorization form must be signed by the Client before any identifiable Client information is searched for, entered into InHOUSE, or designated in InHOUSE for sharing with any Partner Agencies.

I will not knowingly enter malicious or erroneous information into the InHOUSE system.

I understand that I may only view, obtain, disclose, or use the database information that is necessary to perform my job.

I understand that the only individuals who can view information in the InHOUSE system are authorized users and the Clients to whom the information pertains.

A computer that has the InHOUSE “open and running” shall never be left unattended.

If I am logged into InHOUSE and must leave the work area where the computer is located, I must log-off of the software application before leaving the work area.

A computer that has the InHOUSE system “open and running” must have a password protected screen saver installed.

A computer that has the InHOUSE system “open and running” shall never be physically arranged so that unauthorized individuals may see the information on the screen.

Failure to log off the InHOUSE system appropriately and leaving the system exposed may result in a breach in client confidentiality and system security, and may terminate my participation in the InHOUSE system.

I understand that if I notice or suspect a security breach within the InHOUSE system, I must immediately notify my Agency Policy and Procedure Administrator (as defined in the Policies and Procedures Manual).

I understand that all InHOUSE information (hard copies and soft copies) must be kept secure and confidential at all times. When no longer needed, they must be destroyed according to written Policies and Procedures to maintain confidentiality.

I understand that these rules apply to all users of the InHOUSE system, whatever their work role or position.

**USER CODE OF ETHICS**

A. InHOUSE Users must treat Partner Agencies/Jurisdictions with respect, fairness and good faith.

B. Each User should maintain high standards of professional conduct in the capacity as an InHOUSE User.

C. The InHOUSE User has primary responsibility for his/her Client(s).
I understand and agree to comply with all the confidentiality and user ethics statements listed above. I agree to maintain strict confidentiality of information obtained for and through the InHOUSE system. This information will be used only for the legitimate client service and administration of the above named agency. Any breach of confidentiality will result in downgrading of my access, immediate termination of my participation in the InHOUSE system, and may furthermore jeopardize my employment.

InHOUSE User Signature  Date

Agency or System Administrator  Date
Appendix D

HUD Final Data Standards
Homeless Management Information System (HMIS) Data Standards

Revised Notice

U.S. Department of Housing and Urban Development Office of Community Planning and Development

March 2010
reporting requirements while protecting the privacy and informational security of all homeless individuals.

**Process for Revising the 2004 Data Standards**

Starting in late 2007, HUD began the process of identifying potential changes to the 2004 HMIS Standards. Some changes were anticipated to occur in conjunction with HUD’s effort to revise the Annual Progress Report (APR) for Homeless Assistance Programs. (As of 2009, the Annual Progress Report will be re-named the Annual Performance Report (APR). This new title is used in the remainder of this Notice.) In addition, since the publication of the 2004 Notice, HUD has received feedback from communities that suggested the need for clarification or modification to some standards. Thus, HUD’s interest in addressing several community concerns and ensuring the alignment of the standards and the APR – along with the ongoing need to keep pace with current industry standards for technology and security – prompted a thorough re-examination of the HMIS Standards.

In order to develop recommendations for changes to the standards, HUD convened a number of work groups – comprised of HMIS administrators, homeless assistance program representatives, homelessness researchers, and legal and technical advisors. Each group focused on a specific topic, such as HMIS security, privacy, data quality, changes to the Universal and Program-Specific data elements, and potential methods for including domestic violence (DV) service provider data in homelessness reporting.

Following the work group meetings, HUD sought feedback on proposed changes from a broader audience. First, HMIS software solution providers were given the opportunity to comment in writing on proposed changes to security, data quality and software requirements. Second, as part of a HMIS Training held in Atlanta, Georgia in September 2008, HMIS administrators, CoC representatives, and other interested parties were presented with proposed changes to the HMIS Standards and given the opportunity to provide verbal and written feedback. Their feedback was collated and discussed by representatives from the work groups prior to preparation of this Notice. Input from all of
based on best practices currently being implemented at the local level. Others have been included in an effort to begin to standardize reporting on homeless clients across federal agencies.

1.2 Significant Differences between the 2004 and 2009 Notice

The key differences between the 2004 Notice and the 2009 Notice with regard to HMIS Data Standards are described below.

Program Descriptor Data Elements

The 2009 Notice adds a set of program descriptor data standards — that is, data to be collected about all homeless assistance and HPRP homelessness prevention programs in the CoC. The purpose of these new data standards is to ensure that the HMIS is the central repository for all information about homelessness in the CoC, including both programs and clients. These data elements are needed for the following HUD reports: the Annual Performance Report (APR), the Quarterly Performance Report (QPR) for HPRP funded programs, the Annual Homeless Assessment Report (AHAR) and the Housing Inventory that is submitted as part of the annual CoC application for funding.

Universal Data Elements

A new data element, Housing Status has been added in order to distinguish persons who are literally homeless from those who are at imminent risk of losing housing, or in a stable housing situation. The Universal Data elements from the 2004 notice are largely unchanged. Minor changes include: 1) response categories have been added to a number of data elements to provide more detailed information and to be consistent with other federal reporting on homeless programs; and 2) “Don’t Know” and “Refused” response categories are added for those data elements that previously did not include those responses.

Program-Specific Data Elements

In order to align the HMIS Data Standards with the proposed revisions to the APR, this Notice modifies a number of program-specific data elements. For example, certain data elements, such as Income and Sources and Non-Cash Benefits, must now be
communities in order to develop an unduplicated count of homeless people nationwide and analyze the use and effectiveness of homeless assistance services. In subsequent years, Senate and House Appropriations Committee reports have reiterated Congress’ directive to HUD to: 1) assist communities in implementing local Homeless Management Information Systems (HMIS), and 2) develop an Annual Homeless Assessment Report (AHAR) that is based on HMIS data from a representative sample of communities. Most recently, Congress renewed its support for the HMIS initiative and the AHAR in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115).

In addition to Congressional direction on HMIS, HUD, other federal agencies and the U.S. Interagency Council on Homelessness are required under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and reporting on the outcomes of federal assistance in helping homeless people to become more independent. The major congressional imperatives in HUD’s McKinney-Vento Act programs are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of these services in enabling homeless persons to become more self-sufficient; and
- Reporting to Congress on the characteristics of homeless persons and effectiveness of federal efforts to address homelessness.

For the Homelessness Prevention and Rapid Re-Housing Program, the American Recovery and Reinvestment Act of 2009 requires that “grantees receiving such assistance shall collect data on the use of the funds awarded and persons served with this assistance in the HUD Homeless Management Information System ("HMIS") or other comparable database.”
risk of losing their housing (as defined in data element 3.11, Housing Status.).

Homelessness prevention programs include those funded by HPRP and other homelessness prevention programs identified by the CoC as part of its service system.

**Contributory CoC Program:** A homeless assistance program or homelessness prevention program that contributes Protected Personal Information (PPI) or other client-level data to an HMIS.

**Contributory Non-CoC Program:** A program that is neither a homeless assistance program nor a homelessness prevention program that contributes PPI or other client-level data to an HMIS.

**Contributory HMIS Organization (CHO):** An organization that operates a contributory homeless assistance program or homelessness prevention program or contributory non-homeless assistance program.

**Data Recipient:** A person who obtains PPI from an HMIS Lead Agency or from a CHO for research or other purposes not directly related to the operation of the HMIS, CoC, HMIS Lead Agency, or CHO.

**End User (or User):** An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data in the HMIS or another administrative database from which data are periodically uploaded to the HMIS.

**Homeless Management Information System (HMIS):** The information system designated by a CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

**HMIS Lead Agency:** An organization designated by a CoC to operate the CoC’s HMIS on its behalf.

**HMIS Participating Bed:** For any residential homeless program, a bed is considered a "participating HMIS bed" if the program makes a reasonable effort to record all universal data elements on all clients served in that bed and discloses that information through agreed upon means to the HMIS Lead Agency at least once annually.
Unduplicated Count of Homeless Persons: An enumeration of homeless persons where each person is counted only once during a defined period of time.

Victim Service Provider: A nonprofit or nongovernmental organization including rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

1.5 Victim Service Providers

Victim service providers that are funded under HUD’s Supportive Housing Program are instructed not to disclose personally identifying data about any client for purposes of HMIS, per the requirements of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA).

HPRP subgrantees that are victim service providers must collect and record all of the data elements that are required for HPRP subgrantees on all clients served with HPRP funds in a comparable database, and should not directly or indirectly enter personally identifiable information about HPRP beneficiaries in an HMIS.

HUD does not expect victim service providers funded through other sources to disclose personally identifying information for the purposes of HMIS, therefore HMIS coverage will be calculated excluding victim service providers from the universe of homeless assistance programs.

Regardless of funding sources, Program Descriptor data for each homeless assistance program within the CoC operated by a victim service provider must be recorded in the HMIS (either by provider staff member or by the HMIS system administrator), with the exception of a street address for a facility that provides victim services to clients.
<table>
<thead>
<tr>
<th><strong>Program Applicability</strong></th>
<th><strong>Data Standards</strong></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>1 Organization Identifier</th>
<th>When collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 Organization Name</td>
<td></td>
</tr>
<tr>
<td>3 Program Identifier</td>
<td></td>
</tr>
<tr>
<td>4 Program Name</td>
<td></td>
</tr>
<tr>
<td>5 Direct Service Code</td>
<td></td>
</tr>
<tr>
<td>6 Site Information</td>
<td></td>
</tr>
<tr>
<td>7 Continuum of Care Number</td>
<td></td>
</tr>
<tr>
<td>8 Program Type Code</td>
<td></td>
</tr>
<tr>
<td>9 Bed and Unit Inventory Information</td>
<td></td>
</tr>
<tr>
<td>10 Target Population B</td>
<td></td>
</tr>
<tr>
<td>11 Target Population A (Optional for all programs)</td>
<td></td>
</tr>
<tr>
<td>12 Method for Tracking Residential Program Occupancy</td>
<td></td>
</tr>
<tr>
<td>13 Client Identifier</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Residential CC Programs Only</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>All CC Programs</td>
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<table>
<thead>
<tr>
<th><strong>HPRP Programs Only</strong></th>
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</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

**Exhibit 1-1: Summary of Program Descriptor Data Elements**
<table>
<thead>
<tr>
<th>Subject</th>
<th>Program Applicability</th>
<th>Data Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Exhibit 1.3: Summary of Program-Specific Data Elements**

- **Programs**
  - HOPE/A Homeless Programs
  - HPPA Program
  - HUD-Compliant Programs

- **Eligibility**
  - All Clients
  - Youth
  - Kids
  - Adults
  - Unaccompanied Youth

- **Subjects**
  - Education
  - Employment
  - Housing
  - Housing Stability
  - Income and Sources
  - Non-Cash Benefits
  - Health Care
  - Substance Abuse
  - Mental Health
  - HIV/AIDS
  - Domestic Violence

**Program Standards**

- **Assistance**
  - Financial Assistance
  - When Collected
  - Each
  - Every
  - Every Time

- **Programs**
  - Program Entry
  - Program Duration
  - Program Exit

- **Objectives**
  - Program Outcomes
<table>
<thead>
<tr>
<th>195 Services Provided</th>
<th>195 Reasons for Leaving</th>
<th>195 Children's Education</th>
<th>195 Children's Information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>196 Education</td>
<td>196 General Health Status</td>
<td></td>
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</tr>
<tr>
<td>197 Education</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>198 Employment</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>199 Employment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Every Exit</td>
<td>Every Entry</td>
<td>Every Entry</td>
<td>Every Entry</td>
</tr>
<tr>
<td>When Collected</td>
<td>Subject</td>
<td>Subjects</td>
<td>Subjects</td>
</tr>
<tr>
<td>Optional for Programs</td>
<td>Optional for Programs</td>
<td>Optional for Programs</td>
<td>Optional for Programs</td>
</tr>
</tbody>
</table>

Exhibit 14: Additional Program-Specific Data Elements: Optional Data Elements
2.8. Program Type Code
2.9. Bed and Unit Inventory Information
2.10. Target Population A
2.11. Target Population B
2.12. Method for Tracking Residential Program Occupancy
2.13 Grantee Identifier

2.1 Organization Identifier

*Rationale:* To uniquely identify an organization that operates a CoC Program within the CoC.

*Data Source:* Automatically generated by the HMIS software.

*When Data are Collected:* The Organization Identifier is assigned once for each organization. An Organization Identifier must be associated with each CoC Program operated by the organization.

*Subjects:* All organizations operating a CoC Program within the CoC.

*Definitions and Instructions:* A unique Organization Identifier needs to be assigned to each distinct organization that operates a CoC Program. There is no specified format for this data element. The Organization Identifier can be a randomly generated number or some other code as long as each organization receives a distinct identifier that is consistently associated with that organization.

*Required Response Categories:*

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Organization Identifier</td>
<td>A unique Organization Identifier needs to be assigned to each distinct organization that operates a CoC Program. There is no specified format for this data element.</td>
</tr>
</tbody>
</table>

*Special Issues:* None.

*Changes from Previous Notice:* This is a new data element.
Data Source: Automatically generated by the software at the time the program is created in the HMIS.

When Data are Collected: The Program Identifier is assigned once for each CoC Program. The Program Identifier must be associated automatically with each client for each service record.

Subjects: All programs.

Definitions and Instructions: A unique Program Identifier needs to be assigned to each distinct CoC Program. There is no specified format for this data element. The Program Identifier can be a randomly generated number or some other code as long as each program receives a distinct identifier that is consistently associated with that program. All other program descriptor data elements must be associated with the Program Identifier.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.3 Program Identifier</td>
<td>A unique Program Identifier needs to be assigned to each distinct CoC Program. There is no specified format for this data element.</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: This is a new data element. The Program Identification Information data element in the 2004 Notice will no longer be used for HUD reporting purposes.

2.4 Program Name

Rationale: To identify the name of each CoC Program within the CoC. This can be used within the software to associate a client with a program. This name must be listed on a CoC’s Housing Inventory (if applicable), on the HUD APR for programs receiving HUD homeless assistance funding and on the HUD QPR for programs receiving HPRP funding.

Data Source: HMIS Lead Agency or program staff.
Subjects: All programs.

Definitions and Instructions: If clients can directly enroll in the program then the Direct Service code is ‘Yes.’ If the program does not enroll clients directly, then the Direct Service code is ‘No.’ CoC Programs that provide direct services to clients but do not have a formal enrollment process or period (e.g. 2-1-1 Information & Referral programs, street outreach, drop-in or day resource centers, food pantries, or other supportive services) should code ‘Yes.’

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Service Code</td>
</tr>
<tr>
<td>Response Categories</td>
</tr>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Yes</td>
</tr>
</tbody>
</table>

Special Issues: Software must be programmed so that only programs with ‘Yes’ in the Direct Service field can enter information about client stays or service encounters into HMIS.

Changes from Previous Notice: This is a new data element.

2.6 Site Information

Rationale: To describe the overall program configuration and the facility where the CoC Program provides most housing and/or services (i.e. the principal program service site) within the CoC.

Data Source: HMIS Lead Agency.

When Data are Collected: Data is collected once for each CoC Program but must be reviewed annually to ensure that it is up to date.

Subjects: All programs.

Definition and Instructions: Site information is collected at the program- and site-level. For each CoC Program, record the program site configuration type in accordance with the guidance below. For the principal program service site within the CoC, or the site where the greatest level of housing or services are provided, record: 1) the site address, 2) geocode, 3) site type, and 4) housing type.
building or complex that houses both persons with special needs—e.g., homeless or formerly homeless persons, persons with substance abuse problems, persons with mental illness, or persons with HIV/AIDS—and persons without any special needs.

3. Residential: special needs only. Residential housing is located within a building or complex that houses only persons with special needs—e.g., homeless or formerly homeless persons, persons with substance abuse problems, persons with mental illness, persons with HIV/AIDS, persons with a physical disability, and/or elderly persons.

2.6E Housing Type. For the principal program service site, record the appropriate housing type. Non-residential programs should select “Not applicable: non-residential program.”

1. Mass shelter/barracks. Multiple individuals and/or family households sleep in a large room with multiple beds.

2. Dormitory/hotel/motel. Most individuals and/or families share small to medium sized sleeping rooms or have private sleeping rooms. Persons may or may not share a common kitchen, common bathrooms, or both.

3. Shared housing. Most individuals and/or families reside in one or more shared housing units that house up to 8 individuals or 4 families. Each unit includes a kitchen and bath. Each family generally has a private sleeping room, though more than one individual may share sleeping space.

4. Single Room Occupancy (SRO) units. Most individuals reside in a private unit with a sleeping/living room intended for one occupant that contains no sanitary facilities or food preparation facilities, or contains either, but not both, types of facilities.

5. Single apartment (non-SRO) units. Most individuals and/or families reside in a self-contained apartment intended for one individual or family household that includes a private kitchen and bath.
Changes from Previous Notice: These data elements have been added to allow CoCs to use the HMIS to produce a Housing Inventory, Annual Performance Reports and local submissions for the Annual Homeless Assessment Report (AHAR). The site address and geocode replaces the FIPS code requirement that was part of the Program Identifier code in the 2004 Notice.

2.7 Continuum of Care Number

Rationale: To associate each CoC Program with a CoC for HUD reporting purposes.

Data Source: HMIS Lead Agency.

When Data are Collected: The CoC number is collected once for each CoC Program but must be reviewed annually and updated if there are changes to the CoC.

Subjects: All programs that directly serve clients.

Definitions and Instructions: Each CoC Program is assigned a designated HUD CoC number.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.7 Continuum of Care Code</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HUD-assigned CoC Number</td>
</tr>
</tbody>
</table>

Special Issues: Programs that are located in more than one CoC must either establish separate programs in the HMIS for each CoC (if one HMIS covers multiple CoCs) such that each HMIS program is only associated with a single CoC or establishes separate programs in each CoC’s HMIS.

Changes from Previous Notice: The CoC number was previously included as part of the Program Identification Number and is now treated as a separate data element.

2.8 Program Type Code

Rationale: To associate each CoC Program with the specific type of service offered.

Data Source: HMIS Lead Agency.
Data Source: HMIS Lead Agency or program staff.

When Data are Collected: At least annually, or whenever inventory information changes.

Subjects: All residential homeless assistance programs.

Definitions and Instructions: One or more Bed and Unit Inventory Information records must be established for each program. Historical values are needed for the inventory in order to generate reports that relate to various reporting periods. These fields must be transactional, meaning they need to be able to record multiple values over time along with the date that the information changed.

An HMIS may track the data in a variety of ways as long as historical data is maintained, the Housing Inventory for the CoC application can be produced, and inventory data can be mapped to the linked inventory data elements described in this section. Data can be collected annually, as long as the data reflects the changes in inventory over the course of the year, rather than at only a single point in time. The inventory history should reflect changes in standard program operations, but need not reflect day-to-day fluctuations. Examples of housing inventory changes that should be tracked historically include: the addition or removal of a group of new beds or units; the addition or removal of seasonal beds that are available for any period in the year; a program decision to target beds to a different household type; or changes in HMIS participation as a standard practice. Neglects to enter HMIS data on clients using the bed.

The inventory data elements are: Household Type, Bed Type, Availability, Bed Inventory, Unit Inventory, Inventory Start Date, Inventory End Date, HMIS Participating Beds, HMIS Participation Start Date, and HMIS Participation End Date. Permanent supportive housing programs must also record the Chronic Homeless Bed inventory.

Records must be established for each program depending on the combination of Household Types served, Bed Types, and Availability as described in 2.9A, 2.9B, and 2.9C. A program that serves both households without children and households with children will have at least two Bed and Unit Inventory information records in order to track inventory information by household type. If a program provides different types of beds (e.g., year-round and seasonal) then a separate record is established for each bed type. For example, a program that serves single adults and has 100 beds, of which 20 are
2.9A Household Type. This data element describes the household type served by beds and units counted in the Bed and Unit Inventory Information data elements. If some or all beds and units are not designated exclusively for a particular type of household, then record the household type most frequently served by the associated beds and units. For purposes of this data element, persons 18 and over are considered adults and persons under 18 are children. Record the household type for the associated beds and units as follows:

1. *Households without children.* Beds and units are intended for households with adults only. This includes households composed of unaccompanied adults and multiple adults.

2. *Households with children.* Beds and units are intended for households with (at least) one adult and one child, or households with an unaccompanied youth only, or households with multiple children only (e.g., juvenile parent and child).

2.9B Bed Type. The Bed Type describes the type of program beds based on whether beds are: located in a residential homeless assistance program facility (including cots or mats); provided through a voucher with a hotel or motel; other types of beds. Record the bed type as follows:

1. *Facility-based.* Beds (including cots or mats) are located in a residential homeless assistance facility dedicated for use by persons who are homeless.

2. *Voucher.* Beds are located in a hotel or motel and made available by the homeless assistance program through vouchers or other forms of payment.

3. *Other.* Beds are located in a campground, church, or other facility not dedicated for use by persons who are homeless.

2.9C Availability. Describes the availability of beds based on whether beds are available on a planned basis year-round or seasonally (during a defined period of high demand), or on an ad hoc or temporary basis as demand indicates. Record the availability as follows:

1. *Year-round.* Beds are available on a year-round basis.
2.9G Inventory Start Date. The inventory start date is the date when the bed and unit inventory information first applies. This may represent the date when a change in household type, bed type, availability, bed inventory or unit inventory occurs for a given program.

2.9H Inventory End Date. The inventory end date is the date when the Bed and Unit inventory information as recorded is no longer applicable (i.e. the day after the last night when the record is applicable). This may be due to a change in household type, bed type, availability, bed inventory or unit inventory. For seasonal beds, this should reflect the projected end date for the seasonal bed inventory.

2.9I HMIS Participating Beds. This data element is an integer that tracks the total number of beds participating in HMIS as of the HMIS participation start date recorded in 2.9J. For programs that serve a mixed population without a fixed number of beds per household type, record participating beds according to instructions provided in 2.9D.

2.9J HMIS Participation Start Date. This is the date when the HMIS participating bed information first applies (i.e., the date when a change in the number of HMIS participating beds occurs for a program's Bed and Unit inventory record). The HMIS Participation Start Date is the earliest program entry date that could be associated with a client using the bed or unit.

2.9K HMIS Participation End Date. The HMIS participation end date is the date when the HMIS Participation information record is no longer applicable (i.e. the day after the last night when the number of HMIS participating beds is applicable for a program's Bed and Unit Inventory record),
Changes from Previous Notice: Although this information has been collected in the past in order to develop the Housing Inventory for the CoC application, it was not required in the 2004 Notice.

2.10 Target Population A (Optional)

Rationale: This information may be used to track bed utilization and service gaps.

Data Source: HMIS Lead Agency.

When Data are Collected: At least annually, or whenever inventory information changes.

Subjects: All residential homeless assistance programs.

Definitions and Instructions: Record the appropriate Target Population served by the program. Select only one response. A population is considered a "target population" if the program is designed to serve that population and at least three-fourths of the clients served by the program fit the target group descriptor.
1. DV: Domestic Violence victims. The program targets persons who have experienced domestic violence.

2. VET: Veterans. The program targets veterans.

3. HIV: Persons with HIV/AIDS. The program targets persons with HIV/AIDS.

4. NA: Not Applicable. The program does not target domestic violence victims, veterans, or persons with HIV/AIDS.

*Required Response Categories:*

<table>
<thead>
<tr>
<th>Program Descriptor Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.11 Target Population B</td>
<td></td>
</tr>
<tr>
<td>Target Population Type</td>
<td>1 = DV: Domestic Violence victims</td>
</tr>
<tr>
<td></td>
<td>2 = VET: Veterans</td>
</tr>
<tr>
<td></td>
<td>3 = HIV: Persons with HIV/AIDS</td>
</tr>
<tr>
<td></td>
<td>4 = NA: Not Applicable</td>
</tr>
</tbody>
</table>

*Special Issues:* None

*Changes from Previous Notice:* Although this information has been collected in the past in order to develop the Housing Inventory for the CoC application, it was not required in the 2004 notice.

**2.12 Method for Tracking Residential Program Occupancy**

*Rationale:* This data element is needed to identify the method for accurately calculating program utilization and length of stay.

*Data Source:* HMIS Lead Agency.

*When Data are Collected:* Annually.

*Subjects:* All residential homeless assistance programs.

*Definitions and Instructions:* Record the method used to track the actual nights that a client stays in a program. The standard method for residential homeless assistance programs that complete APRs must be based on a comparison of program entry and exit dates. A residential program that is not required to produce an APR may alternatively
historical bed utilization data for reporting purposes; and 4) provide a mechanism to aggregate distinct nights stayed to calculate each client’s total length of stay in the program. If using a bed management system to track shelter stays, the program must record every night of shelter stayed for every client served, mirroring the requirements for program entry and exit date.

**Service Transaction Model.** Programs may use a similar approach to tracking nights of shelter provided using a service transaction approach, where each night of shelter is listed as a shelter service provided to the client wherever “services received” are recorded. The service transaction model is acceptable if: 1) the program records every discrete night (or series of nights) that residential services are recorded; 2) the system maintains historical data on the residential service provided; and 3) the duration of each residential stay can be accurately determined and aggregated to calculate each client’s total length of stay in the program. If using a service transaction approach to track shelter stays, the program must record residential services mirroring the requirements for program entry and exit date.

*Changes from Previous Notice:* This is a new data element.

### 2.13 Grantee Identifier

**Rationale:** To uniquely identify HPRP grantees and subgrantees that receive funding under the American Recovery and Reinvestment Act of 2009. HPRP state and local government grantees may select one or more organizations (called “subgrantees”) to administer HPRP-funded programs. All subgrantees of a federal HPRP grantee must identify their projects with the original state or local grantee identifier as assigned by HUD.

**Data Source:** HPRP grantee or subgrantee.

**When Data Are Collected:** Data is collected once for each HPRP program but must be reviewed annually to ensure that it is up to date.

**Subjects:** All HPRP programs
3. **Universal Data Elements**

The Universal Data elements establish the baseline data collection requirements for all Contributory CoC Programs. HUD carefully weighed the reporting burden of the universal data elements against the importance of the information for producing meaningful local and federal reports. Of special concern to HUD was the reporting burden for programs that register large numbers of applicants on a daily basis, with little time to collect information from each applicant. As a result, the number of Universal Data elements was kept to a minimum.

The Universal Data standards are the basis for producing unduplicated estimates of the number of homeless people accessing services from homeless assistance providers, basic demographic characteristics of people who are homeless, and patterns of service use, including information on shelter stays and homelessness episodes over time. The universal data elements are:

3.1 Name
3.2 Social Security Number
3.3 Date of Birth
3.4 Race
3.5 Ethnicity
3.6 Gender
3.7 Veteran Status
3.8 Disabling Condition
3.9 Residence Prior to Program Entry
3.10 Zip Code of Last Permanent Address
3.11 Housing Status
3.12 Program Entry Date
3.13 Program Exit Date
3.14 Unique Person Identification Number
3.15 Household Identification Number
applying for services. The children do not need to be present at the time the household head applies for services. However, information should not be recorded for children under age 18 if it is indicated that these children will not be entering the program on the same day as the household head. Information for these children should be recorded when the children join the program. Information on any other adults (18 years of age or older) who are applying for services as part of the household will be obtained directly from that adult. Generally, one adult should not provide information for another adult.

3.1 Name

**Rationale:** The first, middle, last names, and suffix should be collected to support the unique identification of each person served.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All clients.

**Definitions and Instructions:** Four fields should be created in the HMIS database to capture the client’s full first, middle, and last names and any suffixes (e.g., John David Doc, Jr.). Programs should seek to obtain legal names only and avoid aliases or nicknames.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Name</td>
<td>Name</td>
<td>John David Doe, Jr.</td>
</tr>
</tbody>
</table>

**Special Issues:** None.

**Changes from Previous Notice:** None.

3.2 Social Security Number

**Rationale:** The collection of a client’s Social Security Number (SSN) and other personal identifying information is required for two important reasons. First, unique identifiers are key to producing an accurate, unduplicated local count of homeless persons accessing
recorded, the database should fill in the missing numbers with blanks so that the numbers provided are stored in the correct place of the Social Security Number. (For example, if only the last four digits of the SSN, “123456789” are given, it should be stored as “___ ___ ___ 6789” and if only the first three digits are provided, it should be stored as “123 ___ ___ ___”.) This will allow maximum matching ability for partial SSNs.

Under federal law (5 U.S.C. Section 552a), a government agency cannot deny shelter or services to clients who refuse to provide their SSN, unless the requirement was in effect before 1975 or SSN is a statutory requirement for receiving services from the program. No HUD-administered McKinney-Vento Act program qualifies under this exception.

Changes from Previous Notice: None.

3.3 Date of Birth

Rationale: The date of birth can be used to calculate the age of persons served at time of program entry or at any point in receiving services. It will also support the unique identification of each person served.

Data Source: Client interview or self-administered form.

When Data are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Definitions and Instructions: Collect the month, day, and year of birth for every person served. If a client cannot remember the year of birth, ask the person’s age and calculate the approximate year of birth. If a client cannot remember the month or day of birth, record an approximate date of “01” for month and “01” for day. CoCs that already have a policy of entering another approximate date may continue this policy. Approximate dates for month and day will allow calculation of a person’s age within one year of their actual age. In another field, record the appropriate date of birth type (data quality code).

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3 Date of Birth</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2 = Asian is a person having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.

3 = Black or African American is a person having origins in any of the black racial groups of Africa. Terms such as “Haitian” can be used in addition to “Black or African American.”

4 = Native Hawaiian or Other Pacific Islander is a person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

5 = White is a person having origins in any of the original peoples of Europe, the Middle East or North Africa.

Required Response Categories:

<table>
<thead>
<tr>
<th>3.4 Race</th>
<th>Response Categories</th>
</tr>
</thead>
</table>
| Race     | 1 = American Indian or Alaska Native  
|          | 2 = Asian            
|          | 3 = Black or African American  
|          | 4 = Native Hawaiian or Other Pacific Islander  
|          | 5 = White            
|          | 8 = Don’t Know       
|          | 9 = Refused          |

Special Issues: None.

Changes from Previous Notice: Race and Ethnicity were previously combined as a single data element with a two-part question. They are now two distinct data elements. The responses “Don’t Know” and “Refused” have been added as response categories for the Race data element.

3.5 Ethnicity

Rationale: Ethnicity is used to count the number of homeless persons who identify themselves as Hispanic or Latino.

Data Source: Client interview or self-administered form.
Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.6 Gender</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>Gender</td>
</tr>
<tr>
<td></td>
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<td></td>
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<td></td>
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<td></td>
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<tr>
<td></td>
</tr>
</tbody>
</table>

Special Issues: None

Changes from Previous Notice: Transgendered has been added as an official response category for the gender data element. Staff observations should not be used as the sole source of information on gender. Staff should ask for the client’s self-perceived gender identity. The responses “Other,” “Don’t Know” and “Refused” have been added as response categories for the Gender data element.

3.7 Veteran Status

Rationale: To determine the number of homeless veterans.

Data Source: Client interview or self-administered form.

When Data are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All adults served.

Definitions and Instructions: A veteran is someone who has served on active duty in the Armed Forces of the United States. This does not include inactive military reserves or the National Guard unless the person was called up to active duty.
**Required Response Categories:**

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.8 Disabling Condition</td>
<td></td>
</tr>
<tr>
<td><strong>Disabling Condition</strong></td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don't Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

**Special Issues:** For residential homeless assistance programs, client intake as part of the program admission process must be separated from the collection of disability information in order to comply with Fair Housing laws and practices, unless this information is required to determine program eligibility or is needed to determine whether applicants need units with special features or if they have special needs related to communication.

It is possible to derive client responses to the *Disabling Condition* question from certain program-specific data elements if the HMIS software can automatically map those responses to the *Disabling Condition* data element. For example, if a client responds affirmatively to having a physical disability (Data Element 4.3), a developmental disability (Data Element 4.4), HIV/AIDS (Data Element 4.6), or a substance abuse problem (Data Element 4.8), then the response to Disabling Condition is “Yes.” If a client affirms that they have a mental health problem (Data Element 4.7) *and* they also affirm that the problem is expected to be of long duration and substantially impairs their ability to live independently, then the response to Disabling Condition is “Yes.” An affirmative response to Chronic Health Condition (Data Element 4.5) does not provide enough information to assess whether the response to disabling condition is “Yes.” Additional assessment is needed to determine whether the condition substantially impedes a client’s ability to live independently and could be improved by more suitable housing conditions. It is important to note that a “no” to any of the questions in 4.3, 4.4, 4.6, 4.7, or 4.8 does not automatically preclude a client from being disabled under the SSA definition. However, a “no” response may require additional assessment to determine whether a physical, emotional or mental impairment is present, whether the condition is expected to last for a long duration, and whether it significantly impedes the client’s ability to live independently.
### Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9 Residence Prior to Program Entry</td>
<td>Type of Residence</td>
</tr>
<tr>
<td>1 = Emergency shelter, including hotel or motel paid for with emergency shelter voucher</td>
<td></td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons (including homeless youth)</td>
<td></td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab)</td>
<td></td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility</td>
<td></td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center</td>
<td></td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric)</td>
<td></td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility</td>
<td></td>
</tr>
<tr>
<td>12 = Staying or living in a family member’s room, apartment or house</td>
<td></td>
</tr>
<tr>
<td>13 = Staying or living in a friend’s room, apartment or house</td>
<td></td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher</td>
<td></td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home</td>
<td></td>
</tr>
<tr>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside); inclusive of “non-housing service site (outreach programs only)”</td>
<td></td>
</tr>
<tr>
<td>17 = Other</td>
<td></td>
</tr>
<tr>
<td>18 = Safe Haven</td>
<td></td>
</tr>
<tr>
<td>19 = Rental by client, with VASH housing subsidy</td>
<td></td>
</tr>
<tr>
<td>20 = Rental by client, with other (non-VASH) ongoing housing subsidy</td>
<td></td>
</tr>
<tr>
<td>21 = Owned by client, with ongoing housing subsidy</td>
<td></td>
</tr>
<tr>
<td>22 = Rental by client, no ongoing housing subsidy</td>
<td></td>
</tr>
<tr>
<td>23 = Owned by client, no ongoing housing subsidy</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
<tr>
<td>Length of Stay in Previous Place</td>
<td></td>
</tr>
<tr>
<td>1 = One week or less</td>
<td></td>
</tr>
<tr>
<td>2 = More than one week, but less than one month</td>
<td></td>
</tr>
<tr>
<td>3 = One to three months</td>
<td></td>
</tr>
<tr>
<td>4 = More than three months, but less than one year</td>
<td></td>
</tr>
<tr>
<td>5 = One year or longer</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

**Special Issues:** This standard does not preclude the collection of residential history information beyond the residence experienced the night prior to program admission. This data element must be recorded in a transactional field each time a client enters a program. Communities may decide whether to include additional response values as long as they can be mapped to the categories included here, including the “other” category.

**Changes from Previous Notice:** Response value 18, Safe Haven, has been added. A safe haven is a form of transitional supportive housing or a drop-in supportive service center.
Program Entry Date) should record the zip code of the apartment, room, or house, where the client is currently living.

Changes from Previous Notice: Zip Code Type response value 1 was changed to “Full or Partial Zip Reported”.

3.11 Housing Status

Rationale: To identify persons who, at program entry and program exit, are literally homeless; housed, but at imminent risk of losing their housing; housed, but at-risk of losing their housing; or in a stable housing situation. This data element allows programs that serve homeless and non-homeless persons to separate these two populations for reporting purposes. This data element is not intended to be used for program eligibility determination purposes, as program eligibility criteria may vary by program and/or funding source. This information can help homelessness prevention programs target their resources appropriately.

Data Source: Client interview or self-administered form.

When Data are Collected: Upon initial program entry or as soon as possible thereafter and at program exit for all programs except emergency shelters. This information may be needed prior to admission to determine program eligibility.

Subjects: All clients.

Definitions and Instructions: For each client, determine whether the client is: literally homeless; imminently losing their housing; unstably housed and at-risk of losing their housing; or stably housed at program entry and exit. A client must be coded to a single response category. For clients exiting a program, the Housing Status should reflect their housing status immediately after exiting the program as determined by the client’s housing destination and anticipated housing stability.

Persons who are literally homeless include people who at program entry or program exit are in one of the following:

- Places not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
• Are experiencing housing instability, but may have one or more other temporary housing options; and
• Lack the resources or support networks to retain or obtain permanent housing.

Housing instability may be evidenced by:
• Frequent moves because of economic reasons;
• Living in the home of another because of economic hardship;
• Being evicted from a private dwelling unit (including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations);
• Living in a hotel or motel not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations;
• Living in severely overcrowded housing;
• Being discharged from a hospital or other institution; or
• Otherwise living in housing that has characteristics associated with instability and an increased risk of homelessness.

Persons who are **stably housed** are in a stable housing situation and not at risk of losing this housing (i.e., do not meet the criteria for any of the other housing response categories, per above definitions).

*Required Response Categories:*

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.11 Housing Status</td>
<td></td>
</tr>
<tr>
<td>1 = Literally homeless</td>
<td></td>
</tr>
<tr>
<td>2 = Imminently losing their housing</td>
<td></td>
</tr>
<tr>
<td>3 = Unstably housed and at-risk of losing their housing</td>
<td></td>
</tr>
<tr>
<td>4 = Stably housed</td>
<td></td>
</tr>
<tr>
<td>8 = Don't Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>
program by the user or provider must be recorded as a new program entry date. A definition of what constitutes a break in the treatment depends on the program and needs to be defined by program staff. For example, programs that expect to see the same client on a daily (or almost daily) basis may define a break in treatment as one missed day that was not arranged in advance or three consecutive missed days for any reason. Treatment programs that are scheduled less frequently than a daily basis may define a break in treatment as one or more missed weekly sessions.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Universal Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12 Program Entry Date</td>
</tr>
<tr>
<td>Response Categories</td>
</tr>
<tr>
<td>Examples</td>
</tr>
<tr>
<td><strong>/</strong>/____</td>
</tr>
<tr>
<td>(Month) (Day) (Year)</td>
</tr>
<tr>
<td>(08/01/2007)</td>
</tr>
</tbody>
</table>

**Special Issues:** Two methods are suggested below for noting and tracking supportive services provided/received by a client prior to Program Entry. It may be useful to record these service events for case management purposes although they would not be included in the APR (for a HUD funded homeless assistance program) or other reports that define clients served based on program entry and exit dates associated with the program.

**Service Transaction Model.** To track services provided before official program entry and/or after program exit, program staff can use the optional “Services Provided” data element described under the Program-Specific Data Element section of this Notice, if the software supports this approach. CoC Programs may select a service type from the response categories in the “Services Provided” data element to track client contacts, engagements, enrollment processes and/or screenings that occur prior to program entry and/or aftercare services provided after program exit.

**Separate Program Model.** Alternatively, CoC Programs may establish a separate program profile within the locally-defined profile of program types in HMIS as another option for tracking provision of services prior to program entry date. Services received by clients in a pre-program entry setting may include enrollment screening, eligibility determination, housing search assistance prior to move to residential-based programs, and/or services that are not eligible activities under the primary program’s funding
For programs that are not required to collect program-specific data, alternate methods can be used for recording actual dates stayed in the program. HUD-funded Transitional Housing programs should use Program Exit Date to record the day that the client leaves the residential portion of the program; follow-up services can be recorded using the methods discussed under Special Issues below, but should not be reported as part of the APR.

For non-residential service programs, the exit date may represent the day a service was provided or the last date of a period of ongoing service. The exit date should coincide with the date the client is no longer considered a program participant. Programs should have a clear and consistently applied procedure for determining when a client who is receiving supportive services is no longer considered a client. For example, if a person has been receiving weekly counseling as part of an ongoing treatment program and either formally terminates his or her involvement or fails to return for counseling, the last date of service is the date of the last counseling session. If a client uses a service for just one day (i.e., starts and stops before midnight of same day, such as an outreach encounter), the entry and exit date would be the same date.

For HPRP programs the Program Exit Date may be the same as the Program Entry Date if the participation in the service begins and ends on the same day. For a client receiving short-term or medium-term rental assistance for two or more consecutive months, the Program Exit Date should be equivalent to the last day of the last month for which the rental assistance payment applies.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
<th>Response Categories</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13 Program Exit Date</td>
<td>[ ]/ [ ]/ [ ]/ [ ]</td>
<td>(08/31/2007)</td>
</tr>
<tr>
<td>Program exit date</td>
<td>(Month) (Day) (Year)</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: Programs may choose to track client contacts or provision of service after a program exit. For example some transitional housing programs offer a period of "aftercare" or "follow up" that corresponds to a period of client contact after the client has exited the residential program component. Depending on the software, service transactions that occur after exit may be able to be tracked using the optional Services Provided data
client. If the client has not been served by their program previously, a PIN is randomly generated and assigned to the client.

When Data Are Collected: Upon program entry.

Subjects: All clients.

Definition and Instructions: Assign a unique ID number to each client served. The PIN is a number automatically generated by the HMIS application. The PIN will not be based on any client-specific information, but instead should be a randomly assigned, computer-generated number.

The HMIS must have functionality to allow the HMIS Lead Agency to deduplicate clients with distinct PINs using identifying information.

Required Response Categories:

<table>
<thead>
<tr>
<th>Universal Data Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.14 Personal Identification Number</td>
</tr>
<tr>
<td>A PIN must be created, but there is no required format as long as there is a single unique PIN for every client served in the CoC using a consistent format and it contains no personally identifying information.</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: None.

3.15 Household Identification Number

Rationale: To count the number of households served in a program.

Data Source: Interview or staff observation that a client is participating in a program as a single person household or as a household with two or more members. May be generated automatically by the HMIS application.

When Data Are Collected: Upon any program entry.

Subjects: All clients.

Definition and Instructions: A household is a single individual or a group of persons who together apply to a CoC program for services. Assign a unique ID number to each household.
4. **Program-Specific Data Elements**

Program-Specific Data elements provide information about the characteristics of clients, the services that are provided, and client outcomes. These data elements must be collected from all clients served by programs that are required to report this information to HUD. Specifically, programs that receive funding through HUD’s Supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program, and the homeless programs funded through the Housing Opportunities for Persons with AIDS (HOPWA) Program are required to collect most of this information in order to complete Annual Performance Reports (APRs). Likewise, programs that are funded through the Homelessness Prevention and Rapid Re-Housing Program are required to collect some of these data elements in order to submit Quarterly and Annual Performance Reports.

For programs with no such reporting requirements, these data standards are optional but recommended since they allow local Continuums of Care (CoCs) to obtain consistent information across a range of providers that can be used to plan service delivery, monitor the provision of services, and identify client outcomes. However, these data elements do not constitute a client assessment tool, and providers will need to develop their own data collection protocols in order to properly assess a client’s need for services.

The Program-Specific Data elements that are needed for HUD reporting include:

4.1 Income and Sources  
4.2 Non-Cash Benefits  
4.3 Physical Disability  
4.4 Developmental Disability  
4.5 Chronic Health Condition  
4.6 HIV/AIDS  
4.7 Mental Health  
4.8 Substance Abuse  
4.9 Domestic Violence  
4.10 Destination  
4.11 Date of Contact
the question. It is not HUD’s intention that clients be denied service if they refuse or are unable to supply the information; however, some information may be required by programs or public or private funders to determine eligibility for housing or services, to assess needed services, or to fulfill reporting requirements. The “Don’t Know” or “Refused” responses should not be used to indicate that the case manager or data entry person does not know the client’s response.

Finally, many of these data elements represent transactions or information that may change over time. Most Program-Specific Data elements should be captured at program entry and exit, and a few must be captured at program entry, exit, and on an annual basis. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

4.1 Income and Sources

Rationale: Income and sources of income are important for determining service needs of people at the time of program entry, determining whether they are accessing all income sources for which they are eligible, and describing the characteristics of the homeless population. Capturing the receipt of cash income from various sources will help to: ensure all income sources are counted in the calculation of total income; enable program staff to take into account the composition of income in determining needs; determine if people are receiving the mainstream program benefits to which they may be entitled; help clients apply for benefits assistance; and allow analysis of changes in the composition of income between entry and exit from the program and annual changes prior to program exit. Income data are also needed to complete APRs for all HUD funded CoC Programs, including HPRP programs.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year. Programs may decide when to collect the
<table>
<thead>
<tr>
<th>Source and Amount of Income</th>
<th>Source of Income</th>
<th>Receiving income source?</th>
<th>Amount from Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Resources</td>
<td>Income received from any source in past 30 days?</td>
<td>0 = No 1 = Yes 8 = Don’t Know 9 = Refused</td>
<td></td>
</tr>
<tr>
<td>1 = Earned Income (i.e., employment income)</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>2 = Unemployment Insurance</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>3 = Supplemental Security Income (SSI)</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>4 = Social Security Disability Income (SSDI)</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>5 = Veteran’s disability payment</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>6 = Private disability insurance</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>7 = Worker’s compensation</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>10 = Temporary Assistance for Needy Families (TANF) (or use local program name)</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>11 = General Assistance (GA) (or use local program name)</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>12 = Retirement income from Social Security</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>13 = Veteran’s pension</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>14 = Pension from a former job</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>15 = Child support</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>16 = Alimony or other spousal support</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>17 = Other source</td>
<td>0 = No 1 = Yes</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
<tr>
<td>Total Monthly Income</td>
<td>Monthly income from all sources</td>
<td>$ _ _ _ _ _00</td>
<td></td>
</tr>
</tbody>
</table>
complete picture of their economic circumstances. This information is needed to complete APRs and QPRs for IIUD funded CoC Programs, including IIIPRP programs.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: For each source listed below, determine if the client received any non-cash benefits in the past 30 days. Clients may identify multiple sources of non-cash benefits. For households with more than one member, non-cash benefits should be assigned in HMIS to all members of the household for whom the benefit is intended. For example, if an entire family is enrolled in Medicaid, the “Non-cash benefits received from any source in the past 30 days” question would be assigned as “Yes” for all household members and the “Source of non-cash benefit: Medicaid health insurance program” would be assigned as “Yes” for all household members.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.2 Non-Cash Benefits Non-Cash Benefit</td>
<td>Non-cash benefit received from any source in past 30 days?</td>
</tr>
<tr>
<td>Source of Non-cash Benefit</td>
<td>Receive Benefit</td>
</tr>
<tr>
<td>1 = Supplemental Nutrition Assistance Program (SNAP) (Previously known as Food Stamps)</td>
<td>0 = No</td>
</tr>
<tr>
<td>2 = MEDICAID health insurance program (or use local name)</td>
<td>1 = Yes</td>
</tr>
<tr>
<td>3 = MEDICARE health insurance program (or use local name)</td>
<td>0 = No</td>
</tr>
<tr>
<td>4 = State Children’s Health Insurance Program (or use local name)</td>
<td>1 = Yes</td>
</tr>
</tbody>
</table>

---

70
Changes from Previous Notice: Under the previous notice, collection of this information was required only at program entry and program exit. Non-cash benefits information also is now required to be collected at least once annually during program enrollment, if the period between program entry and exit exceeds one year. Data collection in the 2004 Notice was limited to adults and unaccompanied youth. Also, a general question on whether any non-cash benefit has been received has been added, as well as response categories to determine if a client is receiving a non-cash benefit from each source. Response category 12 has been changed to clarify that it refers specifically to ongoing rental assistance. A new response category 14 has been added to track temporary rental assistance.

4.3 Physical Disability

Rationale: To count the number of physically disabled persons served, determine eligibility for disability benefits, and assess the need for services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).

Data Source: Client interview, self-administered form, or case manager records.

When Data Are Collected: In the course of client assessment once the individual is admitted—unless this information is needed prior to admission to determine program eligibility—at program exit, and at least once annually during program enrollment if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: In separate fields, determine (a) if the client has a physical disability, and (b) if the client is currently receiving services or treatment for this disability or received services or treatment prior to exiting the program. For the purposes of this Notice, a physical disability means a physical impairment which is (a) expected to be of long, continued and indefinite duration, (b) substantially impedes an individual’s
Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3 Physical Disability</td>
<td></td>
</tr>
<tr>
<td>Physical disability</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If yes)</td>
<td></td>
</tr>
<tr>
<td>[At entry]</td>
<td></td>
</tr>
<tr>
<td>Currently receiving services or treatment for this condition?</td>
<td>0 = No</td>
</tr>
<tr>
<td>[At annual assessment and at exit]: Received services/treatment while in the program?</td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

Special Issues: Programs should be especially sensitive to the collection of disability information from clients under the age of 18. In households with children accompanied by an adult, children’s disability should be determined based on an interview with the adult in the household.

If the response to physical disability is yes, the case manager records must document the physical disability. Documentation includes written verification from a state-licensed professional, such as a medical service provider or a health-care provider, the Social Security Administration, or the receipt of a disability check (i.e., SSDI check or VA disability benefit check).

Changes from Previous Notice: Under the previous notice, collection of this information was required only at program entry, and data collection was limited to adults and unaccompanied youth. The second part of the question related to services or treatment has been added. Response categories for “Don’t Know” and “Refused” were also added to capture information when the client does not know or the client refuses to respond and to ensure consistency in data quality reporting.

4.4 Developmental Disability

Rationale: To count the number of developmentally disabled persons served, determine eligibility for disability benefits, and assess their need for services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).
by an adult, children’s disability should be determined based on an interview with the adult in the household.

If the response to developmental disability is yes, the case manager records must document the developmental disability. Documentation includes written verification from a state-licensed professional, such as a medical service provider or a health-care provider, the Social Security Administration, or the receipt of a disability check (i.e., SSDI check or VA disability benefit check).

*Changes from Previous Notice:* Under the previous notice, collection of this information was required only at program entry, and data collection was limited to adults and unaccompanied youth. The second part of the question related to treatment has been added. Response categories for “Don’t Know” and “Refused” were also added to capture information when the client does not know or the client refuses to respond and to ensure consistency in data quality reporting.

### 4.5 Chronic Health Condition

*Rationale:* To count the number of persons served with severe health conditions and assess their need for healthcare and other medical services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).

*Data Source:* Client interview, self-administered form or case manager records.

*When Data Are Collected:* In the course of client assessment once the individual is admitted—unless this information is needed prior to admission to determine program eligibility—at program exit, and at least once annually during program enrollment if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

*Subjects:* All clients served.

*Definition and Instructions:* In separate fields, determine (a) if the client has a chronic health condition, and (b) if the client is currently receiving services or treatment for this condition or received services or treatment prior to exiting the program. For the purposes
4.6 HIV/AIDS

Rationale: To count the number persons served who have been diagnosed with AIDS or have tested positive for HIV and assess their need for services. Needed to complete APRs for HUD-funded homeless assistance programs (excluding HPRP).

Data Source: Client interview, self-administered form and/or case manager records.

When Data are Collected: In the course of client assessment once the individual is admitted—unless this information is needed prior to admission to determine program eligibility—at program exit, and at least once annually during program enrollment if the period between program entry and exit exceeds one year. Programs may decide when to collect the information on an annual basis, but HUD encourages programs that are required to complete an APR to update these data elements near the end of their APR operating year.

Subjects: All clients served.

Definition and Instructions: In separate fields, determine if the client (a) has been diagnosed with AIDS or has tested positive for HIV, and (b) if the client is currently receiving services or treatment for this diagnosis or received services or treatment prior to exiting the program.

Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIV / AIDS</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If yes)</td>
<td></td>
</tr>
<tr>
<td>[At entry]</td>
<td></td>
</tr>
<tr>
<td>Currently receiving services or treatment for this condition?</td>
<td>0 = No</td>
</tr>
<tr>
<td>[At annual assessment and at exit]: Received services/treatment while in the program?</td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>
**Definition and Instructions:** In separate data fields, determine: (a) if the client has a mental health problem, (b) if the problem is expected to be of long-continued and indefinite duration and substantially impede a client’s ability to live independently, and (c) if the client is currently receiving services or treatment for the condition or received services or treatment prior to exiting the program. A mental health problem may include serious depression, serious anxiety, hallucinations, violent behavior or thoughts of suicide.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.7 Mental Health</td>
<td></td>
</tr>
<tr>
<td>Mental health problem</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don't Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If client has a mental health problem) Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don't Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>(If client has a mental health problem)</td>
<td></td>
</tr>
<tr>
<td>{At entry}</td>
<td></td>
</tr>
<tr>
<td>Currently receiving services or treatment for this condition?</td>
<td>0 = No</td>
</tr>
<tr>
<td>[At annual assessment and at exit]: Received services/treatment while in the program?</td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t Know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
</tbody>
</table>

**Special Issues:** Programs should be especially sensitive to the collection of disability information from clients under the age of 18. In households with children accompanied by an adult, children’s disability should be determined based on an interview with the adult in the household.

If the response to mental health condition is yes, the case manager records must document the mental health condition. Documentation includes written verification should from a state-licensed professional, such as a medical service provider or a healthcare provider, the Social Security Administration, or the receipt of a disability check (i.e., SSDI check or VA disability benefit check).
| Substance abuse problem | 0 = No  
1 = Alcohol abuse  
2 = Drug abuse  
3 = Both alcohol and drug abuse  
8 = Don’t Know  
9 = Refused |
|-------------------------|--------------------------------------------------|
| (If client has a substance abuse problem) Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently | 0 = No  
1 = Yes  
8 = Don’t Know  
9 = Refused |
| (If client has a substance abuse problem) [At entry] Currently receiving services or treatment for this condition? | 0 = No  
1 = Yes  
8 = Don’t Know  
9 = Refused |
| [At annual assessment and at exit]: Received services/treatment while in the program? | 0 = No  
1 = Yes  
8 = Don’t Know  
9 = Refused |

**Special Issues:** Programs should be especially sensitive to the collection of disability information from clients under the age of 18. In households with children accompanied by an adult, children’s disability should be determined based on an interview with the adult in the household.

**Changes from Previous Notice:** For the substance abuse data element, the “dually diagnosed” response category has been changed to “Both alcohol and drug abuse.” Under the previous Notice, collection of this information was required only at program entry, and data collection was limited to adults and unaccompanied youth. A response option of “No” was added to the “Substance abuse problem” question to ensure consistency in data quality reporting. The third part of the question related to treatment has been added. Response categories for “Don’t Know” and “Refused” were also added to capture information when the client does not know or the client refuses to respond and to ensure consistency in data quality reporting.

### 4.9 Domestic Violence

**Rationale:** Ascertaining whether a person is a victim of domestic violence is necessary to provide the person with the appropriate services to prevent further abuse and to treat the physical and psychological injuries from prior abuse. Also, ascertaining that a person may be experiencing domestic violence may be important for the safety of program staff
4.10 Destination

*Rationale:* Destination is an important outcome measure needed to complete APRs and QPRs for all HUD funded CoC Programs, including HPRP programs.

*Data Source:* Client interview or self-administered form.

*When Data Are Collected:* At program exit.

*Subjects:* All clients served.

*Definition and Instructions:* Determine the response value that best describes where the client will be staying after they leave the program. For clients who will be staying with family or friends, select the response that includes the expected tenure of the destination (permanent or temporary). For rental by client and owned by client, select the response that includes the type of housing subsidy, if any, the client will be receiving. A housing subsidy may be tenant-, project- or sponsor-based and provides ongoing assistance to reduce rent burden. This includes either a housing subsidy provided through the Veterans Affairs Supportive Housing (VASH) program or other housing subsidy. Other housing subsidies may include a HUD-funded subsidy (e.g., public housing, Housing Choice Voucher or “Section 8”) or other housing subsidy (e.g., state rental assistance voucher).
destinations where no housing subsidy exists. Response categories 12 and 13 have been revised to refer specifically to destinations with temporary tenure. New response categories 19 through 21 refer to destinations that include ongoing subsidies. New response values 22 and 23 refer to destinations with permanent tenure. Finally, two other new response categories were added: “Safe Haven” and “Deceased.”

4.11 Date of Contact (required for street outreach programs only; optional for other programs)

*Rationale:* To record and count the number of contacts with homeless persons by street outreach programs. Needed to complete APRs for HUD-funded homeless assistance programs that conduct street outreach.

*Data Source:* Program staff

*When Data Are Collected:* Each time a client is contacted.

*Subjects:* All clients served.

*Definition and Instructions:* The definition of a client contact may vary among programs and communities. As a matter of general principle, a contact is defined as an *interaction* between the street outreach worker and the client. A contact may include the distribution of brochures or other materials, a verbal conversation between the street outreach worker and the client about the client’s well being or service needs, or a referral to service. For the purpose of the APR, street outreach programs must report the total number of contacts during the operating year by location of contact.

*Required Response Categories:*

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.11 Date of Contact</td>
<td></td>
</tr>
<tr>
<td>Date of contact</td>
<td><em>/<strong>/</strong></em>___ <em>:</em>:_</td>
</tr>
<tr>
<td></td>
<td>(Month) (Day) (Year) (Hour) (Minute)(Use 24-hour ‘military’ time)</td>
</tr>
</tbody>
</table>
Required Response Categories:

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4.12 Date of Engagement</td>
<td></td>
</tr>
<tr>
<td>Date of engagement</td>
<td><em><strong>/</strong></em>/____</td>
</tr>
<tr>
<td></td>
<td>(Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: This is a new data element and is required for street outreach programs only.

4.13 Financial Assistance Provided (required for HPRP-funded programs only; optional for all other programs)

Rationale: To determine the type of financial assistance (including rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel and hotel vouchers) and amount provided during program participation. This data element is required for HPRP-funded programs only in order to complete the QFR and APR.

Data Source: Case manager records.

When Data are Collected: When HPRP financial assistance is provided as a one-time transaction and at least once every three months for participants receiving medium-term rental assistance.

Subjects: All clients served.

Definition and Instructions: Record HPRP financial assistance that is provided to a third party for the benefit of program clients. In separate fields record the following financial assistance information: start date for financial assistance, end date of financial assistance, type of financial assistance, and amount of HPRP financial assistance. Response categories for the types of financial assistance are consistent with the requirements of the HPRP Notice (FR-5307-N-01). Financial Assistance Provided data should be collected for each member of the household benefiting from HPRP financial assistance.

Programs that provide on-going rental assistance for consecutive months (i.e., short-term rental assistance for two to three months or medium-term rental assistance) must minimally enter one Financial Assistance Provided record for each three-month period of
Programs must record the amount of HPRP financial assistance provided for each instance of one-time or ongoing financial assistance, as described above. Programs may also choose to record information on financial assistance provided through other sources. However, this should be recorded as a separate transaction in order to distinctly record and track HPRP financial assistance payments.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Program-Specific Data Element</th>
<th>Required for HPRP-Funded Programs; Optional for All Other Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.13 Financial Assistance</strong></td>
<td><strong>Response Categories</strong></td>
</tr>
<tr>
<td>Start Date of Financial Assistance</td>
<td>__ __ / __ / ________</td>
</tr>
<tr>
<td></td>
<td>(Month)  (Day)  (Year)</td>
</tr>
<tr>
<td></td>
<td>(09/01/2009)</td>
</tr>
<tr>
<td>End Date of Financial Assistance</td>
<td>__ __ / __ / ________</td>
</tr>
<tr>
<td></td>
<td>(Month)  (Day)  (Year)</td>
</tr>
<tr>
<td></td>
<td>(11/30/2009)</td>
</tr>
<tr>
<td>Financial Assistance Type</td>
<td>1 = Rental assistance</td>
</tr>
<tr>
<td></td>
<td>2 = Security deposits</td>
</tr>
<tr>
<td></td>
<td>3 = Utility deposits</td>
</tr>
<tr>
<td></td>
<td>4 = Utility payments</td>
</tr>
<tr>
<td></td>
<td>5 = Moving cost assistance</td>
</tr>
<tr>
<td></td>
<td>6 = Motel &amp; hotel vouchers</td>
</tr>
<tr>
<td>Financial Assistance Amount</td>
<td>$ ______.00</td>
</tr>
</tbody>
</table>

**Special Issues:** For HPRP reporting, categorization as short- or medium-term rental assistance is determined based on the number of months for which rental assistance is provided during a period of continuous program participation (as determined by the program entry and exit dates or end of reporting period). Programs also may choose to record the number of specific months for which assistance with rental or utility arrearage payments apply in order to assist with recordkeeping and compliance monitoring related to adherence to the financial assistance eligibility requirements of the HPRP Notice (FR-5307-N-01). However, this is not a requirement of this Notice.
**When Data are Collected:** At least once every three months during program enrollment, if the period between program entry and exit exceeds three months, and at program exit.

**Subjects:** All clients served.

**Definition and Instructions:** Services provided are those that the program provides directly for the benefit of program clients. In separate fields record the following information: start date of services, end date of services, and type of service(s) provided. Response categories for the types of housing relocation and stabilization services are consistent with the requirements of the HPRP Notice (FR-5307-N-01).

To minimize staff burden at programs that provide one-time services to clients, the program can enter the start and end dates at the same time or can specify software that automatically enters the end date as the day of or the day after the start date for clients receiving one-time services.

For data collection purposes, a period of service (determined by start and end dates) must not exceed three months and should not overlap with other recorded periods. A new service record with start and end dates must be recorded at least every three months during a period of program participation (as established by a program entry date and program exit date). Programs may decide to record services provided information for intervals less than three months (e.g. every month).

HMIS software must allow HPRP programs to record transactional data for services provided in intervals not greater than three months in order to meet HPRP reporting requirements. Each record must allow one or more types of HPRP services that were provided during the service period to be selected.

While Housing Relocation & Stabilization Services Provided data must be collected for each client receiving HPRP assistance (i.e. all members of the assisted household), data collection can either occur by entering a record for each member of the household enrolled in the program or HMIS software can automate the process of adding records to all household members whenever one member receives the service. If automated, HMIS software can only add records for other household members if the other household members have the same Household Identification Number and Housing Status at program entry as the client for whom the Housing Relocation & Stabilization
4.15C General Health Status
4.15D Pregnancy Status
4.15E Veteran’s Information
4.15F Children’s Education
4.15G Reason for Leaving
4.15H Services Provided

4.15A Employment

Rationale: To assess client’s employment status and need for employment services.

Data Source: Client interview or self-administered form.

When Data Are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year.

Subjects: All clients served or all adults and unaccompanied youth.

Definition and Instructions: In separate fields, determine: (1) if the client is currently employed; (2) if currently employed, how many hours did the client work in the last week; (3) if currently employed, is the work permanent, temporary, or seasonal; and (4) if the client is not currently working, if they are currently looking for work and/or increased work hours. Seasonal employment is work that can, by the nature of it, ordinarily only be performed during a certain season in the year. Temporary employment is work for a limited time only or for a specific piece of work and that work will last a short duration. Permanent employment is work that is contemplated to continue indefinitely.

Required Response Categories:

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15A Employment</td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>0 = No&lt;br&gt;1 = Yes&lt;br&gt;8 = Don’t Know&lt;br&gt;9 = Refused</td>
</tr>
</tbody>
</table>

If currently working, number of hours worked in the past week

______ hours
school diploma or General Equivalency Diploma (GED), what degree(s) has the client earned. Allow clients to identify multiple degrees.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
</table>
| **Currently in school or working on any degree or certificate** | 0 = No  
1 = Yes  
8 = Don't Know  
9 = Refused |
| **Received vocational training or apprenticeship certificates** | 0 = No  
1 = Yes  
8 = Don’t Know  
9 = Refused |
| **Highest level of school completed** | 0 = No schooling completed  
1 = Nursery school to 4th grade  
2 = 5th grade or 6th grade  
3 = 7th grade or 8th grade  
4 = 9th grade  
5 = 10th grade  
6 = 11th grade  
7 = 12th grade, No diploma  
10 = High school diploma  
11 = GED  
12 = Post-secondary school  
8 = Don’t Know  
9 = Refused |
| **If client has received a high school diploma, GED or enrolled in post-secondary education, what degree(s) has the client earned** | 0 = None  
1 = Associates Degree  
2 = Bachelors Degree  
3 = Masters Degree  
4 = Doctorate Degree  
5 = Other graduate/professional degree  
6 = Certificate of advanced training or skilled artisan  
8 = Don’t Know  
9 = Refused |

**Special Issues:** None.

**Changes from Previous Notice:** Information on education may be collected from all clients or all adults and unaccompanied youth served by the program. The previous notice recommended limiting data collection to adults and unaccompanied youth. In
when the client refuses to respond and to ensure consistency in data quality reporting. In addition, it is recommended that the revised data element be collected at program entry, program exit and on an annual basis.

4.15D Pregnancy Status

Rationale: To determine eligibility for benefits and need for services, and to determine the number of women entering CoC programs while pregnant.

Data Source: Client interview or self-administered form.

When Data are Collected: In the course of client assessment nearest to program entry.

Subjects: All females of child-bearing age served.

Definition and Instructions: In separate fields, determine (a) if a client is pregnant and (b), if so, what is the due date. The due date is one field that consists of the two-digit month, two-digit day and four-digit year. If the day is unknown, programs are encouraged to record “01” as a default value. Communities that already have a policy of entering another approximate day may continue this policy. If the month is unknown, programs should leave the data field blank.

Required Response Categories:

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15D Pregnancy Status</td>
<td></td>
</tr>
<tr>
<td>Pregnancy status</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don't know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If yes, due date</td>
<td><strong>/</strong>/<strong>/</strong>/__</td>
</tr>
<tr>
<td></td>
<td>(Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

Special Issues: Records for pregnant clients should be updated automatically to account for changes in clients’ pregnancy status (e.g., following the birth of a child). Using the “If yes, due date” field, the HMIS should automatically update, but not overwrite, the client’s record by changing the “Pregnancy status” field from “Yes” to “No” once the due
**Required Response Categories:**

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15E Veteran’s Information</td>
<td></td>
</tr>
<tr>
<td><strong>Military service eras</strong></td>
<td></td>
</tr>
<tr>
<td>1 = Persian Gulf Era (August 1991 – September 10, 2001)</td>
<td></td>
</tr>
<tr>
<td>2 = Post Vietnam (May 1975 – July 1991)</td>
<td></td>
</tr>
<tr>
<td>3 = Vietnam Era (August 1964 – April 1975)</td>
<td></td>
</tr>
<tr>
<td>4 = Between Korean and Vietnam War (February 1955 – July 1964)</td>
<td></td>
</tr>
<tr>
<td>5 = Korean War (June 1950 – January 1955)</td>
<td></td>
</tr>
<tr>
<td>6 = Between WWII and Korean War (August 1947 – May 1950)</td>
<td></td>
</tr>
<tr>
<td>7 = World War II (September 1940 – July 1947)</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
<tr>
<td>10 = Post September 11, 2001 (September 11, 2001 - Present)</td>
<td></td>
</tr>
<tr>
<td><strong>Duration of active duty</strong></td>
<td>_____ months</td>
</tr>
<tr>
<td><strong>Served in a war zone</strong></td>
<td></td>
</tr>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
<tr>
<td><strong>If yes, name of war zone</strong></td>
<td></td>
</tr>
<tr>
<td>1 = Europe</td>
<td></td>
</tr>
<tr>
<td>2 = North Africa</td>
<td></td>
</tr>
<tr>
<td>3 = Vietnam</td>
<td></td>
</tr>
<tr>
<td>4 = Laos and Cambodia</td>
<td></td>
</tr>
<tr>
<td>5 = South China Sea</td>
<td></td>
</tr>
<tr>
<td>6 = China, Burma, India</td>
<td></td>
</tr>
<tr>
<td>7 = Korea</td>
<td></td>
</tr>
<tr>
<td>8 = South Pacific</td>
<td></td>
</tr>
<tr>
<td>9 = Persian Gulf</td>
<td></td>
</tr>
<tr>
<td>10 = Other</td>
<td></td>
</tr>
<tr>
<td>11 = Afghanistan</td>
<td></td>
</tr>
<tr>
<td>12 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>13 = Refused</td>
<td></td>
</tr>
<tr>
<td><strong>If yes, number of months in war zone</strong></td>
<td>_____ Months</td>
</tr>
<tr>
<td><strong>If yes, received hostile or friendly fire</strong></td>
<td></td>
</tr>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>
When Data are Collected: In the course of client assessment nearest to program entry, at program exit and at least once annually during program enrollment, if the period between program entry and exit exceeds one year.

Subjects: All children between 5 and 17 years of age.

Definition and Instructions: For each child, determine in separate fields: 1) if the child is currently enrolled in school; 2) if the child is currently enrolled, the name of the school; 3) if the child is currently enrolled, indicate if the child is connected with the McKinney-Vento Homeless Assistance Act school liaison; 4) the type of school; 5) if the child is not currently enrolled in school, what date was the child last enrolled in school; and 6) what problems has the head of household had in getting the child enrolled into school. The last date of enrollment consists of the two-digit month and four-digit year. If the month is unknown, programs are encouraged to record “01” as a default value. Communities that already have a policy of entering another approximate month may continue this policy. If the year is unknown, programs should leave the data field blank. When identifying the problems the head of household encountered when enrolling the child in school, allow clients to identify multiple reasons for not enrolling the child in school.

Required Response Categories:

<table>
<thead>
<tr>
<th>Optional Program-Specific Data Element</th>
<th>Response Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.15F Children’s Education</td>
<td></td>
</tr>
<tr>
<td>Current enrollment status</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If yes, name of child’s school</td>
<td></td>
</tr>
<tr>
<td>(Example: Lone Pine Elementary School)</td>
<td></td>
</tr>
<tr>
<td>If yes, was/is the child connected to the McKinney-Vento Homeless Assistance Act school liaison?</td>
<td>0 = No</td>
</tr>
<tr>
<td></td>
<td>1 = Yes</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If yes, type of school</td>
<td>1 = Public school</td>
</tr>
<tr>
<td></td>
<td>2 = Parochial or other private school</td>
</tr>
<tr>
<td></td>
<td>8 = Don’t know</td>
</tr>
<tr>
<td></td>
<td>9 = Refused</td>
</tr>
<tr>
<td>If not enrolled, last date of enrollment</td>
<td>[ ] [ ] [ ]</td>
</tr>
<tr>
<td>(Month) (Year)</td>
<td></td>
</tr>
<tr>
<td>Optional Program-Specific Data Element</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------</td>
<td></td>
</tr>
<tr>
<td>4.15G Reason for Leaving</td>
<td>Response Categories</td>
</tr>
<tr>
<td>Reason for leaving</td>
<td>1 = Left for a housing opportunity before completing program</td>
</tr>
<tr>
<td></td>
<td>2 = Completed program</td>
</tr>
<tr>
<td></td>
<td>3 = Non-payment of rent/occupancy charge</td>
</tr>
<tr>
<td></td>
<td>4 = Non-compliance with program</td>
</tr>
<tr>
<td></td>
<td>5 = Criminal activity/destruction of property/violence</td>
</tr>
<tr>
<td></td>
<td>6 = Reached maximum time allowed by program</td>
</tr>
<tr>
<td></td>
<td>7 = Needs could not be met by program</td>
</tr>
<tr>
<td></td>
<td>8 = Disagreement with rules/persons</td>
</tr>
<tr>
<td></td>
<td>9 = Death</td>
</tr>
<tr>
<td></td>
<td>10 = Unknown/disappeared</td>
</tr>
<tr>
<td></td>
<td>11 = Other</td>
</tr>
</tbody>
</table>

Special Issues: None.

Changes from Previous Notice: Under the previous notice, this information was required for all programs; it is now optional.

4.15H Services Provided

Rationale: To determine the services provided to clients during program participation. This data element can be used to track referrals from street outreach programs. It may also be useful in identifying service gaps in a community and for meeting monitoring and reporting requirements for non-HUD funded programs.

Data Source: Case manager records.

When Data are Collected: When services are provided during the course of program participation.

Subjects: All clients served.

Definition and Instructions: Services Provided are those that the program provides directly for the benefit of program clients. For each service encounter, two types of information are recorded in separate fields. Record “date of service” as the two-digit month, two-digit day and four-digit year. Record “type of service” as one of the service types listed below.

Required Response Categories:
Part II

Department of Housing and Urban Development

Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR 4848-N-02]

Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice

AGENCY: Office of the Assistant Secretary for Community Planning and Development, U.S. Department of Housing and Urban Development (HUD).

ACTION: Final notice.

SUMMARY: This notice implements data and technical standards for Homeless Management Information Systems (HMIS). The final Notice follows publication of a draft Notice on July 22, 2003.

DATES: Effective Date: August 30, 2004.

FOR FURTHER INFORMATION CONTACT:

Michael Roanhouse, Office of Special Needs Assistance Programs, Office of the Assistant Secretary for Community Planning and Development, Room 7262, Department of Housing and Urban Development, 451 Seventh Street, SW, Washington, DC 20410-7000; telephone (202) 708-1226, ext. 4482 (this is not a toll-free number). Hearing-or speech-impaired individuals may access the toll-free number by calling the toll-free Federal Information Relay Service at 1-800-877-8339.

SUPPLEMENTARY INFORMATION:

I. Background—The July 22, 2003 Draft Notice

On July 22, 2003 (68 FR 43430), HUD published a draft Notice that described the data and technical standards for implementing HMIS. An HMIS is a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance services and stores that data in an electronic format. Because an HMIS has the capacity to integrate data from all homeless service providers in the community and to capture basic descriptive information on every person served, it is a valuable resource for communities. HMIS can be employed to: better understand the characteristics of homeless persons in the community, including their demographic characteristics, patterns of homelessness, and use of services; improve the delivery of housing and services to specific sub-populations such as veterans or persons experiencing chronic homelessness; and assess and document the community’s progress in reducing homelessness.

Over the past several years, Congress has directed HUD to assist local jurisdictions in implementing HMIS and in using data from these systems to understand the size and characteristics of the homeless population, analyze local patterns of services usage, and assess local service needs. HUD’s goals for the development of local HMIS are threefold:

1. Bringing the power of technology to the day-to-day operations of individual housing and service providers;
2. Knitting together housing and service providers within a local community into more coordinated and effective delivery systems for the benefit of homeless clients; and
3. Obtaining and reporting critical aggregate information about the characteristics and service needs of homeless persons.

To achieve these goals, HUD has initiated a yearlong process to develop national data and technical standards for HMIS. The standards have been developed with extensive input from an expert panel composed of practitioners, advocates, government representatives and researchers. The composition of the expert panel was designed to make sure that the need for addressing key policy questions would be balanced against practical considerations about the data collection environment.

A draft Notice that outlined the data and technical standards was published in July 2003, to permit Continuums of Care (CoCs) (local bodies that plan for and coordinate homeless services), homeless service providers, local and State governments, advocates and homeless clients an opportunity to review and comment on the proposed standards. The draft Notice was divided into five sections:

Section 1. The Introduction, presented background information on the Congressional direction on improving homeless data collection and analysis at the local and national levels, and specific statutory based programmatic and planning requirements for addressing homeless needs. This section also described HUD’s major policy decisions regarding HMIS and the benefits of developing an HMIS for homeless persons, local homeless assistance providers, CoCs and national policy makers.

Section 2. The Universal Data Elements, described the data elements that are to be collected from all clients served by all homeless assistance programs reporting to the HMIS.

Universal data elements (including date of birth, gender, race, ethnicity, and veteran’s status) are needed for CoCs to understand the basic dynamics of homelessness in their communities and for HUD to meet Congressional direction to: develop unduplicated counts of homeless service users at the local level; describe their characteristics; and identify their use of homeless assistance and mainstream resources.

Section 3. the Program Level Data Elements (called Program-Specific Data Elements in the final Notice), described data elements that are required for programs receiving certain types of funding, but are optional for other programs. Most program-specific data elements are required for programs that receive funding under the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act) (42 U.S.C. 11301 et seq.) and complete Annual Progress Reports (APRs). In the future HUD intends to use HMIS data as a basis for grantees to complete APRs.

Finally, Section 4, Standards for Data Confidentiality and Security, and Section 5, Technical Standards, described how data are to be safeguarded and the technical requirements for HMIS applications and for the CoCs or other entities responsible for storing HMIS data.

II. Significant Differences Between the July 22, 2003, Draft Notice and This Final Notice

The final Notice takes into consideration the public comments received on the July 22, 2003 draft Notice. After reviewing the public comments, the significant changes described below have been made to the Notice:

1. The methodology for obtaining data has been made less prescriptive. The final Notice no longer prescribes a methodology for obtaining the data, as long as the definitions of the data elements are used to collect client information. This allows housing and service providers the flexibility to collect the required information in ways that are suitable for the operation of their programs and their local circumstances. For many providers, there may be very few changes in the way they already obtain information from clients.

Specifically, the data standards have been changed from a survey format that presented both recommended questions and required response categories for each data element to a format that specifies only the required response categories. The draft Notice included questions for obtaining each data element to ensure collection of consistent information across communities. To meet the same objective, the final Notice includes a definition of each data element and the required response categories, but does not mandate the procedures for.
collecting the information. Data collection procedures can be tailored to meet the circumstances of providers as long as the collected information is consistent with the definition of the data element. Also, follow-up questions and corresponding data fields for use when a client provides only partial answers have been removed. For providers that want to use the questions, they are presented in Exhibits 2 and 4 of the final Notice. The timing of the data collection has also been made more flexible so that providers can choose the time most appropriate to collect the information. One important exception involves Disabling Condition, a data element that was added to the universal data standards in the final Notice. As discussed in the final Notice, providers are required to report a client's disability status only after the client has been accepted into the program, unless disability is an eligibility criterion for the program (such as disability status for the Shelter Plus Care program or HIV status for the Housing Opportunities for Persons with AIDS Program). Instructions for the program-specific data standards allow providers to collect the information at the time when it makes most sense, for example, during a client needs assessment, or provision and monitoring of services, or from case management records. Finally, the final Notice acknowledges that providers or communities can collect additional data elements to meet other information needs in the community. Also, required response categories can be disaggregated to meet local information needs, as long as the locally-developed response categories can be aggregated to the response categories for each data element in the final Notice. For example, programs may choose to collect more detailed information regarding a client's residence prior to program entry by disaggregating the emergency shelter response category into several categories (hotel, motel, campground paid for with emergency shelter voucher, particular type of crisis shelter or runaway youth shelter). For reporting purposes, the more detailed categories must be combined into the emergency shelter response category.

2. Privacy and security standards are more flexible than in the draft Notice. This final Notice has been revised to provide housing and service providers more flexibility in implementing privacy and security standards, while establishing minimum requirements for protecting HMIS data. The revised standards establish policies and procedures for addressing the privacy and confidentiality of information collected by HMIS, while allowing for reasonable and responsible uses and disclosures of data.

The privacy and security section provides baseline standards required of all programs that record, use or process HMIS data. The baseline standards are based on principles of fair information practices and security standards recognized by the information privacy and technology communities as appropriate for securing and protecting personal information. The section also identifies additional protocols or policies that communities may choose to adopt to further ensure the privacy and confidentiality of information collected through HMIS. Programs are encouraged to apply these additional protections as needed to protect client confidentiality. Programs may also implement other forms of protections not specified in the Notice as long as these protections do not conflict with the standards in this Notice. The revision has been made in recognition of the broad diversity of programs involved in HMIS and the various programmatic and organizational realities that may prompt some programs to implement higher standards. While some programs (e.g., programs that serve particularly vulnerable populations) strive to implement the highest level of privacy and security standards possible because of the nature of their homeless population and/or service provision, other programs (e.g., programs that serve large numbers of clients daily) may find higher standards excessively prescriptive and overly burdensome. At a minimum, however, all programs must meet the baseline requirements described in the Notice.

III. Discussion of the Public Comments Received on the July 22, 2003, Draft Notice

The public comment period for the proposed Notice closed on September 22, 2003. HUD received comments on the draft Notice from 167 commenters, representing a variety of organizations and entities. Comments were received from: members of CoCs and homeless service providers; disability and domestic violence advocacy groups; homeless and low-income housing advocacy organizations; HMIS software vendors; legal and privacy organizations; Federal, State, county and city government agencies; a public housing authority; consulting firms and research organizations; academia; and the general public. Overall, more than 1,600 distinct comments were made. The comments expressed a wide range of viewpoints. Very few commenters expressed unqualified support for, or opposition to, the draft Notice. Instead, many commenters mixed broad statements of support with criticisms of specific provisions in the Notice. The statements of support frequently commended HUD for issuing the draft Notice, stating that uniform data collection and technical standards will benefit homeless persons, the programs that serve them, and the policies designed to address homelessness. Some commenters wrote that accurate HMIS data will "improve services provided to homeless families and individuals," help agency staff to "streamline referrals and coordinated case management" and comprise "one of the cornerstones of a comprehensive program to prevent and end homelessness." A few commenters urged HUD to expand the scope of the draft Notice by requiring all programs affected by the Notice to share HMIS data, and some commenters recommended adding data elements or questions. However, a few commenters condemned the entire HMIS initiative as invasive of client privacy, burdensome to programs and beyond Congressional intent. The criticisms raised by the commenters generally focused on the data collection requirements and the privacy and security standards of the draft Notice. A number of commenters expressed concerns that the data collection requirements would be burdensome to program staff or invasive of client privacy. Some commenters believed the proposed requirements would take away from service provision and potentially discourage clients from seeking services. Other commenters expressed concerns about the implication of the draft Notice for particular subpopulations. Some commenters took the position that the collection of disability-related information and other medical information violates fair housing or privacy laws and could lead to discriminatory housing practices. Several domestic violence groups were particularly concerned with the collection of personal identifying information, and stated that the privacy standards in the Notice were inadequate to protect the safety of domestic violence victims. On the other hand, a number of commenters indicated that the security standards were overly prescriptive and costly to implement. The following sections of this preamble present a more detailed review of the most significant concerns raised by the public in response to the
July 22, 2003, draft Notice and HUD’s response to each concern. The sections proceed as follows:

Section IV of this preamble discusses general comments on the draft Notice.

Section V of this preamble discusses the comments regarding the Universal Data Elements.

Section VI of this preamble discusses the comments regarding the Program-Specific Data Elements.

Section VII of this preamble discusses the comments regarding the Privacy and Security Standards and Technical Standards.

IV. General Comments About the Draft Notice

Several commenters expressed general concerns with the draft Notice that were not associated with specific data elements or technical provisions.

Comment: HUD should not require CoCs to develop HMIS systems. Some commenters wrote that HUD should not require communities to develop HMIS, noting that HMIS could be used to track homeless people and could put some people, particularly vulnerable populations, at risk. Other commenters supported the development of local HMIS. One commenter applauded the Department’s efforts to collect better data to further improve services to homeless families and individuals.

Another commenter stated that implementation of HMIS had enabled his community to better serve their consumers. Another noted the benefits of HMIS, both in terms of its ability to better inform a community’s understanding of the problem of homelessness and as a case management tool for individual providers.

HUD Response: The development of local HMIS began as a grassroots effort over 20 years ago, led by homeless program administrators in a small number of communities across the country. The positive experiences with HMIS in shaping local homeless policies and improving services to homeless clients led the Congress to authorize federal agencies to begin providing support for the local development of HMIS starting in the 1990s.

HUD recognizes that: (1) Development of HMIS can pose a burden on clients and the providers that assist them; and (2) without adequate safeguards, providing data to an HMIS could put a homeless person at risk. However, the burden of data collection must be balanced against the benefits of HMIS, including better coordination and delivery of services to homeless persons and obtaining information that can help providers and policymakers to understand the magnitude of homelessness and the needs of homeless individuals and families. Also, HUD has consulted with information privacy experts to develop privacy and confidentiality standards that are regarded as best practices and providing optional privacy protections for programs that require additional safeguards. HUD is committed to working with CoCs to ensure that adequate safeguards are in place so that information collected through HMIS is protected.

Comment: Clarify HUD’s position on the creation of a national database. A few commenters were concerned that the draft Notice contained the necessary elements to create a centralized, nationwide database. These commenters were particularly troubled by the requirement to collect personal identifying information since this information could be used to track homeless persons at the national level.

HUD Response: HUD believes that its position in the draft Notice is clear: “The HMIS initiative will include no Federal effort to track homeless people and their identifying information beyond the local level.” As stated in the final Notice, HUD will only require CoCs to record HMIS data in the aggregate and not by individual.

Comment: Funding for HMIS is not adequate. Some commenters noted that there are significant costs associated with implementing an HMIS at the local level (e.g., purchasing software and hardware, training staff, and collecting data on an on-going basis). Several commenters who represented communities with existing HMIS systems noted that significant costs would be associated with changing their system to conform with the proposed data standards. In addition, some commenters expressed concern that HUD funding for HMIS would reduce the resources available for direct services and stated that a separate funding source should be made available for HMIS.

HUD Response: Congress has authorized HUD to provide Federal funding to support the development of HMIS at the local level. Starting in 2001, Congress directed HUD to make HMIS an eligible cost under the Supportive Housing Program (SHP). Subsequently, HUD’s 2001, 2002 and 2003 CoC Notice of Funding Announcements allowed CoCs to apply for SHP funding in order to pay for the costs associated with HMIS equipment, software, computer services, managing and operating the system, analyzing HMIS data and producing reports, and training. While planning costs are not an eligible activity under SHP, some communities have used Community Development Block Grant funds to cover HMIS planning costs. (For more information on using SHP and other sources to pay for HMIS implementation, see HUD’s “Homeless Management Information System: Implementation Guide,” p. 56.)

Congress has also provided funding for technical assistance on the HMIS initiative. HUD has used these funds to engage experienced technical assistance providers to work with communities across the country to plan for, implement and update HMIS.

Comment: HMIS is not a good way to count homeless people. There are other ways to obtain an estimate of the number of homeless persons and their needs. Some commenters stated that HMIS is not a good way to obtain a count of the number of homeless people in a community because: (1) it only counts persons who are receiving services; and (2) it is invasive and, therefore, will discourage homeless persons from seeking services. Several commenters indicated that a number of organizations in their communities that serve homeless persons do not participate in HMIS, and as a result, their clients would not be included in the HMIS count of homeless persons. These commenters were concerned that using HMIS would lead to undercounts of homelessness and result in cuts in homeless programs. Several commenters stated that HUD could obtain an unduplicated count by conducting annual point-in-time counts of homeless persons. Other commenters stated that HUD could conduct intensive research in a small number of communities to obtain information about the number and characteristics of homeless persons.

HUD Response: HUD agrees that HMIS will not produce an unduplicated count of all homeless persons, but rather an unduplicated count of all homeless persons who use homeless assistance services and participate in HMIS. However, research has shown that, over the course of a year, a very high proportion of homeless persons will use some kind of homeless service; therefore, HMIS will capture information on most homeless persons in a community.

It was also noted that not all housing and service providers in a community participate in HMIS. Obtaining participation of all providers is critical to a comprehensive HMIS system but it will take time. In the near term, HUD will provide guidance to CoCs on how they can use existing HMIS information to estimate the number of persons who are not included in an HMIS because they use services of a non-participating
provider. Technical assistance will also be provided on building broad-based provider participation in local HMIS.

HUD disagrees that small research studies or point-in-time counts will provide information of equal or better quality to HMIS on the characteristics and needs of homeless persons. Point-in-time counts provide information on the number of people experiencing homelessness on a particular day. One of the key benefits of HMIS is that it can produce an accurate count of the number of people in a community who experience homelessness over the course of a year (or some other period of time) and their patterns of homelessness and service use.

Generally, HMIS counts reveal a much higher number of persons experiencing homelessness than point-in-time estimates, which tend to under-represent people who are homeless only for short periods.

In-depth research studies are useful for probing into a particular issue, but cannot be used to understand the magnitude of homelessness across a community or beyond particular communities. HMIS can be used for this purpose and, in combination with other data sources (such as in-depth interviews), can be used to explore specific policy-relevant topics in a cost-efficient manner.

Comment: Proposed data collection requirements go beyond Congressional intent. Several commenters stated that the draft data standards go beyond Congressional intent to produce an unduplicated count of homelessness. For example, some commenters stated that questions about physical and behavioral health are irrelevant to Congressional intent and others questioned the need to collect personal identifiers to meet the directive.

HUD Response: HUD disagrees that the data standards go beyond Congressional intent. The draft and final Notice present the Congressional authority for data collection. These include two requirements: First, that HUD grantees assess client needs; and second, that the Interagency Council on Homelessness submit reports to Congress regarding how federal funds are used to meet the needs of homeless persons. Further, as described in the draft and final Notice, Congress has directed HUD (see Consolidated Appropriations Act of 2004 [Pub. L. 108–199, approved January 23, 2004], Fiscal Year [FY] 2001 H.R. Report 106–988; Pub. L. 106–377; FY 2001 Senate Report 106–410; and FY 1999 House Report 105–610) to use HMIS data to develop an unduplicated count of homeless persons and to analyze patterns of use of assistance, including how people enter and exit the homeless assistance system, and the effectiveness of such assistance. In the FY 2001 Senate Report 106–410, Congress also expressed concern about the role of mainstream income support and social services programs in addressing the problems of homelessness and has charged HUD and other agencies to identify ways in which mainstream programs can prevent homelessness among those they serve.

Moreover, it would not be possible for HUD to respond to Congressional concerns without obtaining information on the characteristics and needs of homeless persons, including the types of disabilities that may contribute to homelessness. It is also not possible for local providers to determine whether homeless clients are accessing mainstream resources without collecting Social Security Numbers (SSNs) and other personal identifying information. Section V of this preamble discusses the standards regarding the collection of SSNs in more detail.

Comment: The data required for HMIS poses a significant burden on homeless clients and service providers. A number of commenters were concerned about the amount of information to be collected from homeless clients and the personal nature of some of this information. Commenters stated that collecting the information would have numerous negative effects, including: Discouraging homeless persons from seeking services; reducing the amount of time the provider has to provide services; undermining the client/provider relationship; and discouraging non-HUD funded providers from participating in HMIS.

HUD Response: HUD acknowledges that data collection can be burdensome, especially for programs that register large numbers of people each night. In developing the data standards, every effort was made to balance the need for obtaining basic information about users of homeless assistance services against the need to avoid disrupting the provision of services. In revising the Notice, HUD reviewed all of the universal data elements and made some adjustments in order to limit data collection as much as possible. It is important to emphasize that only the universal data elements are required for all providers reporting to the HMIS. Many homeless assistance providers are already collecting much of this information as part of their intake process and for program administration purposes, including reporting to HUD and other funding sources. Further, some of this data (name, date of birth, race, and ethnicity) does not need to be re-collected every time a client re-enters a program because this information does not change between service encounters.

A subset of the program-specific data elements is required for: (1) Programs that receive HUD McKinney-Vento Act funds and complete Annual Progress Reports (APRs); and (2) Housing Opportunities for People with AIDS (HOPWA) projects that target homeless persons and complete APRs. These data elements are consistent with the information that communities already collect and aggregate for the APRs. There will be some additional effort required as programs adjust to the HMIS-based APR that HUD will adopt in the future.

HUD has attempted to address the burden issue by providing flexibility with respect to when and how client information is obtained. As the final Notice indicates, there is no longer a requirement that program-specific data elements be collected from clients at or shortly after intake. The information can be collected during the client assessment process, taken from client records, or recorded based upon the observations of case managers.

Comment: Clarify the special provision for domestic violence programs. Some commenters stated that HUD's special provisions for domestic violence programs are inadequate because many victims seek services at mainstream homeless programs. Several commenters suggested an exemption from HMIS for any individual accessing homeless services who reports that he/she is, or has been, a victim of domestic violence.

However, some commenters disagreed with the special provision for domestic violence programs. These commenters stated that domestic violence providers may constitute a significant part of a CoC and, if they do not participate, the CoC will not be able to produce an accurate count of the homeless. The commenters were concerned that, if domestic violence victims are not included in a description of the local homeless population, it will not be possible to identify the level of resources needed to provide for their special needs.

HUD Response: HUD has carefully considered the special circumstances associated with victims of domestic violence and domestic violence programs with respect to participation in the HMIS. It is understood that unlike other special populations, victims of domestic violence could be physically at risk if individuals who intend to cause them harm are able to obtain personal information from an HMIS
with inadequate security and confidentiality protections. At the same time, domestic violence programs play an important role in many CoCs. As a number of commenters noted, their lack of participation in an HMIS means that it will not be possible to obtain an accurate unduplicated count of homeless persons in a community or adequately understand the needs of the homeless population. HUD is also aware that in some communities around the country domestic violence programs are participating in the HMIS after reaching agreement with the CoC about ways that HMIS information can be protected to ensure the safety of domestic violence clients.

After careful consideration, HUD has determined that it is essential for domestic violence providers to participate in HMIS and that technological and administrative solutions are available that will adequately protect data on victims of domestic violence. Therefore, domestic violence programs that receive HUD McKinney-Vento funding are required to participate in local HMIS and must submit client-level information to obtain an unduplicated count of homeless persons at the CoC level. CoC representatives are instructed to meet with domestic violence program staff in their communities with the goal of developing a plan for participation that includes protocols that address the concerns of domestic violence programs and ensures adequate protection of data.

Participation in HMIS can occur through a variety of arrangements, and communities are encouraged to think creatively about solutions that allow domestic violence programs to fulfill this HUD requirement. HUD will provide technical assistance to local CoCs to help them develop solutions that meet the needs of victims of domestic violence and the programs that serve this population. Given that it may take some time to negotiate protocols and agreements, HUD will permit CoCs to stage the entry of domestic violence programs last, including after the October 2004 goal for HMIS implementation. The later permissible staging of domestic violence programs into the HMIS will be taken into account in HUD’s assessment of CoC progress in HMIS implementation in the national CoC competitive ranking process.

All domestic violence programs, regardless of funding, are encouraged to participate in HMIS, to ensure that critical information about domestic violence clients is available for public policy purposes.

V. Comments Regarding Universal Data Elements

Comments about the universal data standards ranged from overall statements about reducing the number of elements to detailed suggestions for revising response categories and recommendations for adding elements. Comment: Remove some of the universal data elements to reduce the burden on providers, particularly large overnight shelters and family shelters. Several commenters indicated that the number of universal data elements should be reduced to limit the burden on shelters that serve a large number of clients every night. Some commenters stated that only the elements needed for an unduplicated count of homeless service users should be part of the required universal data elements. A few commenters suggested having two tiers of universal data elements, with a smaller number of elements for emergency shelters and the full list for other providers. Several commenters also stated that collecting all the universal data elements for each child in the family is too burdensome for providers serving large families.

On the other hand, some commenters suggested adding more detailed response categories, moving some of the program-specific data elements to universal data elements or adding new data elements. HUD Response: In developing and reviewing the universal data standards, HUD made every effort to balance the need for requiring basic information about users of homeless services against the data collection burden for service providers and clients. All of the data elements are necessary for meeting Congress’s desire for an unduplicated count of people using homeless assistance services and an analysis of the characteristics and patterns of service use of people who are homeless.

In reviewing the universal data elements, HUD identified several areas in which the Notice could be and was revised to reduce the burden of data collection for the universal data elements while still fulfilling Congressional instructions. The “Month/Year of Last Permanent Address” and “Program Event Number” data elements were dropped from the data standards due to data quality concerns and burden issues. Requirements for obtaining follow-up information when clients could only provide partial or incomplete information were eliminated for many elements. The number of required response categories was also reduced for several data elements to facilitate the intake for each client. In addition, “Don’t Know” and “Refused” response categories were removed from almost every data element.

Finally, many of the comments on the burden of universal standards assumed that every universal data element would need to be collected each time a person uses a provider’s services or uses any service in a community that shares data across providers. This is not required. Many of the universal data elements do not change over time (e.g., SSN and birth date), so these elements only have to be collected the first time the person is served. To clarify this, we have added a column to Exhibit 1 of the final Notice, Summary of Universal Data Elements, which specifies whether the element needs to be collected the first time only or every time the person uses a service. Comment: Universal data elements should include all information needed to determine whether a client is chronically homeless. Several commenters said that HUD’s initiative to end chronic homelessness defines a chronically homeless person as someone who has a pattern of homelessness over the past year or years and is disabled. Therefore the universal data elements need to include an indicator of whether or not the client is disabled in order to measure chronic homelessness.

HUD Response: HUD agrees that the elements needed to identify chronic homeless individuals should be part of the universal data standards. A Disabling Condition data element has been added as a universal data element for this purpose. For programs that do not require this information to determine program eligibility, this data element can be obtained from an assessment of a client’s needs, by asking the client about their disability status, through observation, or through reviewing case management records kept by the provider. Where disability information is not required for program eligibility, homeless service providers must separate the client intake process for program admission from the collection of disability information in order to comply with Fair Housing laws and practices. Thus, unless the information is needed for eligibility determination, Disabling Condition should be collected only after the client has been admitted into the program.

Comment: Collection of full SSNs is unnecessary for obtaining unduplicated count of the homeless and may discourage clients from obtaining services. A number of commenters stated that collection of SSNs was unnecessary for obtaining an
unduplicated count of homeless service users. Some commenters suggested that a partial SSN (e.g., last 5 digits) should be collected and used along with other information such as name, birth date, and gender to obtain an unduplicated count. Several of the commenters also wrote that collection of SSNs infringed on a client's privacy and would discourage clients from seeking services.

HUD Response: HUD has carefully considered comments expressing concerns about collection of SSNs, but has concluded that the benefits of collecting SSNs outweigh the burden. Some CoCs and many individual providers already collect SSNs as part of their program operations without reporting any problems. On the contrary, many programs report that collecting SSN greatly facilitates the process of identifying clients who have been previously served. Further, the Notice explicitly states that a client who does not have or refuses to provide his/her SSN cannot be denied service for this reason unless it is a statutory requirement of the program under which the service is provided.

While name and date of birth are useful identifiers, these identifiers by themselves do not produce as accurate a method for distinguishing individual homeless persons as using SSN, since names change and people share the same date of birth. Overall, the collection of SSNs greatly improves the accuracy of deduplication.

Also, an important Congressional goal is to increase the use of mainstream programs to prevent homelessness. To achieve this goal, providers need the SSN along with the other personal identifiers in order to access mainstream services for their clients.

Comment: Transgender categories should be added to the Gender data element. Several commenters recommended adding “transgender male to female” and transgender “female to male” categories to the Gender element to provide transgender clients these options for self-identification. Some commenters also wrote that it was inappropriate to specify that providers who use transgender categories should aggregate them to “Don’t Know” for reporting purposes.

HUD Response: The final Notice allows local communities to add transgender response categories to meet their local needs, but has not made transgender response categories mandatory for the HMIS. The HMIS will be implemented by a wide variety of providers in a variety of circumstances. HUD has tried to keep mandatory reporting elements and response categories to a minimum, while allowing local communities and individual providers the flexibility to include additional response categories as appropriate for their community. However, the response categories used by local communities or individual providers must be aggregated to the required response categories for reporting purposes. For providers who add transgender categories, the responses should be aggregated to the self-identified gender of the client, for example a client who reports “transgender male to female” should be aggregated to the female category.

Comment: Drop the Zip Code of Last Permanent Address element because it is too difficult to collect. Some commenters stated that Zip Code of Last Permanent Address would not be a reliable element, because clients may not remember it because of their unstable living arrangements, cognitive problems, or simply because they have forgotten it. Commenters also raised concern about the burden of collecting last permanent street address for clients who could not recall their zip code. A few commenters suggested adding a response category for clients who report never having had a permanent address.

HUD Response: HUD does not agree that the zip code should be dropped. HUD recognizes that Zip Code of Last Permanent Address may be difficult for some clients to report accurately, but believes the information that is reported will be valuable for local communities to understand the geographic mobility of the homeless population and the effective catchment areas for service providers. For example, CoCs that currently collect this data element have used this information to raise awareness of homeless issues in communities that were disengaged previously from the CoC planning process.

In order to reduce data collection burden, one modification has been made to the data element. In the final Notice, programs are not required to collect the street address of clients who cannot recall their last permanent zip code.

Comment: Inserting an “X” for unknown digits in SSN and birth date fields is burdensome for software developers and adds extra key strokes for persons entering information. Some commenters stated that placing an “X” for each unknown date in the date field conflicts with many software applications, because they allow only numeric digits in the date fields. They suggested using an approximate date, such as January (i.e., 01) for missing month and 01 for missing day. Some commenters also wrote that placing an “X” for missing digits in the SSN field adds unnecessary keystrokes and will require software developers to create nine date fields instead of one for SSN.

HUD Response: HUD agrees with these suggestions. The final Notice does not require entering an “X” for missing SSN digits and allows for approximate dates for missing month and day where appropriate.

Comment: Do not mandate “Don’t Know” and “Refused” response categories for each question. A number of commenters suggested eliminating the requirement for “Don’t Know” and “Refused” response categories for each data field in the universal and program-specific standards or making them optional fields. Some commenters pointed out that for elements with specific data formats (e.g., birth date) or text fields (e.g., name), a second data field would be required to capture this information. Other commenters noted that these response categories would take up excess computer screen or paper form space and require the creation of additional fields. Finally, some commenters were concerned that these categories would diminish the value of some key data elements because staff and clients would check these responses for expediency, neglecting the opportunity to collect valuable information. A few commenters expressed support for having these response options for each data element.

HUD Response: HUD agrees that requiring “Don’t Know” and “Refused” response categories for every data field is an unnecessary burden. While individual providers and local communities still have the option of including these data fields, they are only required for the following elements: SSN; Veterans Status; Disability Condition; Residency Prior to Program Entry; and Zip Code of Last Permanent Address.

VI. Comments Regarding Program-Specific Data Elements

Comment: Program-specific data elements are too burdensome. Several commenters stated that too many program-specific data elements are required. Some commenters estimated that collecting the program-specific data elements would require a significant amount of time and resources, exceeding the current capacity of most programs.

HUD Response: As discussed in the general comments section, HUD is sensitive to the burden that data collection represents to homeless assistance providers. However, a misunderstanding as to which programs are required to collect program-specific
data elements contributed to concerns about burden. Many commenters thought that all providers were required to collect the program-specific data elements in addition to the universal data elements. This is not HUD's intent. Programs that do not complete APRs are not required to collect any of the program-specific data elements.

HUD will require providers that receive HUD McKinney-Vento or Hopwa funding for homeless services and complete APRs to collect a select number of program-specific data elements. Since these data elements are necessary for APR reporting purposes, providers should be collecting much of this information already.

The standards also include optional program-specific data elements (that is, elements that are not required to complete APRs). These optional elements were included based on discussions with other Federal agencies that administer programs for homeless persons. HUD is working with these agencies to standardize, to the maximum extent possible, the data elements and definitions used by various agencies in their reporting requests of homeless providers. The long-term goal is to make reporting easier and more consistent for homeless providers who use multiple Federal programs.

HUD recognizes that the mixing of APR-required and optional program-specific data elements contributed to concerns about burden. The final Notice discusses the two types of data elements separately. Data elements 3.1 through 3.11 are needed to complete APRs. Data elements 3.12 through 3.17 are recommended for inclusion in an HMIS because they provide important additional information about homeless persons and are needed for non-HUD funded reporting purposes.

Finally, HUD is aware that the question and answer format presented in the draft Notice contributed to concerns about burden. For each data element, the draft Notice provided a series of questions that providers would use to collect and record client information. For some APR-required data elements (e.g., Income and Sources), the questions were intended to provide a step-by-step process for making (sometimes difficult) determinations about the status of a person. The final Notice does not specify the questions to be asked.

Comment: Health-related or other sensitive client information should not be collected at intake. Commenters expressed two main concerns with the collection of health-related or other sensitive data at intake. First, several commenters stated that intake staff could not be expected to properly collect some of the program-specific data elements—in particular physical or developmental disability, behavioral health status, and experience with domestic violence—since many frontline staff are not trained to make assessments about these conditions. Commenters also noted that program staff should not collect health-related or other sensitive information at program entry, because clients often resist such inquiries when asked by people they do not know or trust. Commenters emphasized the need to build a rapport with clients throughout the assessment process to gain their trust, correctly identify their needs, and provide the appropriate service or referral.

Second, some commenters suggested that collecting health-related and other sensitive client information at intake could lead to unfair and discriminatory treatment of persons with disabilities. Some of these commenters were concerned that clients would be stigmatized or possibly denied shelter or services solely on the basis of their disability status or other health condition.

HUD Response: HUD agrees with these comments. The Notice no longer allows program staff to collect health-related information (including Physical Disability, Developmental Disability, HIV/AIDS, Mental Health, and Substance Abuse) at intake, unless this information is a statutory or regulatory eligibility requirement (e.g., such as disability status for the Shelter Plus Care program or HIV status for the Housing Opportunities for Persons with AIDS program). Where disability status is not an eligibility requirement, the collection of health-related information may occur throughout the client assessment process to ensure that a client's disability status is properly recorded. The change in the timing of data collection also creates more time for providers to build a rapport with clients.

Furthermore, HUD has made it clear throughout the final Notice that homeless service providers cannot deny services to an otherwise eligible person on the basis of his/her disability or health status. In addition, the final Notice requires programs for which disability is not an eligibility criterion to collect disability-related information only after the client has been admitted into the program.

The final Notice also contains specific language in Section 4 that requires providers to post a sign at each intake desk (or comparable location) stating the reasons for collecting this information.

Providers are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include, but is not limited to, providing qualified sign language interpreters, readers, or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability.

In addition, providers that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program.

Comment: Unclear how the program-specific data elements relate to the APR. Some of the commenters suggested that HUD clarify the relationship between the APR and the HMIS data collection requirements. Many of these commenters indicated that the proposed data elements and required response categories were not consistent with APR reporting requirements, despite HUD's stated intention to use HMIS data for APR reporting in the future.

HUD Response: As discussed in the general comments section, HUD anticipates moving toward an APR based on HMIS data, and therefore has made the final Notice consistent with the current APR. The response categories for several program-specific data elements (e.g., Destination and Services Received) were modified to be consistent with the APR. For example, the Destination data element contains the same places listed as response categories in the APR and asks service providers to report whether the destination is permanent or temporary and if the move involves one of HUD's housing programs. Also, a Reasons for Leaving data element was added to the program-specific data elements with response categories identical to the APR categories. Grantees that implement an HMIS in accordance with the final Notice will be able to satisfy HUD APR reporting requirements.

In addition, a cross-walk of HMIS and APR response categories is provided for both the Services Received and Destination program-specific data elements in Section 3 of this notice. The cross-walk provides guidance on how to meet APR reporting requirements using the HMIS response categories for these data elements.

As previously noted, HUD anticipates changes to the APR in the future, but not before most HUD grantees have implemented an HMIS that is compliant with this Notice. HUD will begin working with interested parties and its research and technical assistance
with the practical realities of homeless service providers. Additional optional privacy protections are also presented for programs that choose to implement higher privacy standards because of the nature of their programs or service population. Although these additional privacy protections are optional, they are based on principles of fair information practices recognized by the information privacy community as appropriate for protecting personal information. Programs are encouraged to apply these additional protections as needed to provide a higher level of privacy when appropriate to meet local circumstances.

Comment: Security standards were too prescriptive. Some commenters objected to the security standards as overly prescriptive, particularly the proposed standards for passwords, workstation firewalls, and physical access. Some commenters stated that the requirement could prompt program staff to post their passwords in publicly accessible places, negating the security provided by the password. The requirement to install workstation firewalls was criticized by several commenters as cost prohibitive for agencies that are understaffed, especially in terms of information technology IT support, and underfunded. Some commenters indicated that the physical access provision requiring program staff to shut down a workstation when not in use was burdensome and unrealistic.

HUD Response: HUD agrees with these comments and has modified the security standards accordingly. The security standards in the final Notice follow the format of the privacy standards by presenting baseline requirements for all programs and additional security protections that communities may choose to implement to further ensure the security of their HMIS data. The baseline requirements are based on current information technology practices and rely on software applications that typically come with hardware purchased within recent years. For example: The password requirements have been simplified to meet minimum industry standards with the aim of reducing breaches in security from staff writing the passwords in publicly accessible areas; firewalls are not required on each individual workstation, so long as there is a firewall between that workstation and the outside world; and password-protected screen savers that automatically turn on are required to mitigate the burden of shutting down workstations.

Comment: Clarify how the privacy and security standards relate to the Health Insurance Portability and Accountability Act (HIPAA). Several commenters wanted HUD to clarify how the privacy and security standards for HMIS relate to the privacy and security rules for health information issued by the Department of Health and Human Services (HHS) under the authority of HIPAA. The commenters especially wanted clarification on how these standards would apply to homeless service providers that are not “covered entities” under HIPAA and therefore not obligated to abide by HIPAA regulations.

HUD Response: Based on input from a panel of experts (composed of homeless service providers, representatives from various federal agencies and national advocacy groups, and leading homeless researchers) and legal consultants, it is HUD’s understanding that very few homeless service providers are “covered entities” under HIPAA. When a homeless service provider is a covered entity, the provider is required to operate in accordance with HIPAA regulations. The final Notice states that such a provider is not required to comply with the HMIS privacy or security standards. Exempting HIPAA covered entities from the HMIS privacy and security rules avoids all possible conflicts between the two sets of rules. Where a homeless service provider is not a covered entity under HIPAA, it is subject to the HMIS privacy and security standards. A provider is also subject to applicable state and local privacy laws.

Although most homeless programs are not subject to HIPAA, HUD recognizes that the HIPAA privacy rule establishes a national baseline of privacy standards for most health information.

Accordingly, the HIPAA privacy rule was used as a guide for developing the HMIS privacy standards. For example, both the final Notice and HIPAA seek to assure that clients’ personal information is properly protected while allowing for the flow of client information needed to provide and promote high quality services to clients. Like HIPAA, the HMIS final Notice strikes a balance between important and responsible uses of information and protecting the privacy of homeless persons who seek services. Further, both the HMIS final Notice and HIPAA are designed to recognize the unique programmatic and operational realities of a range of entities.

In several instances the HMIS baseline requirements exceed the
requirements in the HIPAA privacy rule. Where programmatic and organizational realities of certain programs (e.g., programs that register a large numbers of clients daily) would make the use of HIPAA standards impractical, the privacy standards in this Notice diverge from HIPAA. Yet, in all instances, additional protocols or policies are presented that communities may choose to adopt to further ensure the privacy and confidentiality of information collected through HMIS.

Comment: Clarify disclosure provision for law enforcement purposes. Several commenters criticized the disclosure provision for law enforcement purposes as too lax and particularly inadequate in domestic violence situations. Commenters indicated a concern that some law enforcement personnel may have abused their access to databases containing sensitive personal information in the past. Furthermore, in situations involving domestic violence, commenters said that they are aware of instances where law enforcement personnel are the abusers; thus, the provision would place victims of domestic violence at risk. Most of these commenters suggested that the uses and disclosures provision for law enforcement purposes should require a court order, court ordered warrant, or a subpoena.

HUD Response: The standards pertaining to the uses and disclosures of information were based on the standards set forth in HIPAA. The general principle in HIPAA is that a covered entity is permitted, but not required, to disclose protected health information for law enforcement purposes, without an individual's authorization, for six specified purposes or situations. HIPAA allows covered entities to disclose protected health information to a law enforcement official: (1) As required by law or in compliance with court orders, subpoenas, and administrative requests; (2) to identify or locate a suspect, fugitive, material witness, or missing person; (3) in response to a law enforcement official's request for information about a victim or suspected victim of a crime; (4) to alert law enforcement of a person's death, if the covered entity suspects that criminal activity caused the death; (5) when a covered entity believes that protected health information is evidence of a crime that occurred on its premises; or (6) by a covered health care provider in a medical emergency not occurring on its premises, when necessary to inform law enforcement about the commission and nature of a crime, the location of the crime or crime victims, and the perpetrator of the crime 45 CFR 164.512(f). HIPAA clearly allows disclosure of protected health information to law enforcement officials under several circumstances that do not involve court orders, warrants, or subpoenas.

In accordance with HIPAA standards, the final Notice adopts the general principle that all uses and disclosures are permissible and not mandatory, except for first party access to records and any required disclosures for oversight of compliance with HMIS privacy and security standards. However, HUD recognizes the particularly sensitive circumstances within certain programs and has made the following modifications to the final Notice. Among permitted disclosures to law enforcement, this final Notice specifies that service providers may (but are not required to) disclose protected information in response to a law enforcement official's request for the purpose of identifying or locating a suspect, fugitive, material witness, or missing person. In this case, the protected information is limited to name, address, date of birth, place of birth, SSN, and distinguishing physical characteristics. This provision is comparable to HIPAA. Furthermore, service providers may (but are not required to) disclose protected information for other law enforcement purposes to a law enforcement official if the law enforcement official: Makes a written request that is signed by a supervisory official of the law enforcement agency seeking the protected information; states that the information is relevant and material to a legitimate law enforcement investigation; identifies the protected information sought; is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and states that de-identified information could not be used to accomplish the purpose of the disclosure. This requirement is more restrictive than HIPAA.

Comment: Clarify HUD's intention that clients not be denied service if they refuse to supply identifying information, and how data collection may prompt some clients to feel coerced into participating in the HMIS. A few commenters were concerned that the proposed standards do not require providers to explicitly inform each client that some information requests are optional and that services cannot be denied if a client refuses to provide information. The commenters indicated that clients frequently perceive a power imbalance between themselves and housing and service providers and will consequently feel compelled to provide the requested information or risk being denied services.

HUD Response: The draft Notice stated that it is not HUD's intention that clients be denied service if they refuse to supply identifying information. HUD expects homeless service providers to attempt to collect the information specified in the final Notice for each client, but acknowledges that clients may choose not to provide information when Federal, State or local laws grant persons the right not to provide certain types of information. HUD, other Federal agencies, State and local governments, and private funders of homeless services often require certain information to determine eligibility for housing or services or to assess needed services. This eligibility-related information is often statutory and/or regulation-based and is contained in provider agreements. Therefore, some providers are required to obtain certain information from homeless persons as a condition for receiving services. (See HUD's McKinney-Vento Act client-eligibility and assessment program requirements above). Exceptions to this requirement may occur in outreach programs to the street homeless or other nonresidential-based services such as soup kitchens. In such cases, an intake is often not taken, or even possible, and no information is required to access the service.

In addition, in some situations the potential dynamics within programs may prompt clients to feel coerced into supplying information. The final Notice has been modified to mitigate these circumstances. As discussed in previous sections, the methodology for collecting data was modified and programs are no longer required to collect sensitive data, particularly medical and health-related information, at program intake. The final Notice permits programs to collect much of this information during the client assessment process. By separating the data collection process from program entry, programs can build a relationship with clients and work to diminish any perceived power imbalances between provider and client.

In accordance with the baseline privacy standards specified in Section 4 of the Notice, providers are required to include a statement in their privacy notice that explains generally the reasons for collecting this information. Providers may use the following language to meet this standard: "We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be
required to collect some personal information by law, or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.”

VIII. Paperwork Reduction Act

The information collection requirements in this Notice have been approved by the OMB and assigned OMB control numbers 2506–0145, 2106–0112, 2506–0133 and 2506–0117, respectively. In accordance with the Paperwork Reduction Act of 1995 U.S.C. (44 U.S.C. 3501–3520), an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number.

1. Introduction to the Notice

This Notice sets forth the results of the Department’s deliberative process to develop national data and technical standards for locally administered Homeless Management Information Systems (HMIS). An HMIS is a computerized data collection application designed to capture client-level information over time on the characteristics and service needs of homeless persons. HMIS is being used increasingly by communities across the country to improve the delivery of service to homeless persons and to obtain better information about their needs. Today’s advanced HMIS applications offer homeless assistance providers the opportunity to collect information about client needs, service usage, and service outcomes. They also permit provider staff to access timely resource and referral information and to manage operations.

This Notice is divided into five parts. This Introduction describes the benefits of an HMIS for homeless persons, local homeless assistance providers, local bodies that plan for and coordinate homeless services (most frequently known as Continuums of Care [CoC] 1), and policy makers at the local and national levels. It also describes the statutory authority that allows HUD to prescribe HMIS data and technical standards and provides an overview of the standards and related requirements. The next two parts of the Notice set forth the HMIS data standards. Section 2 presents the Universal data elements that HUD has determined must be collected from all clients receiving homeless assistance services. Section 3 presents Program-specific data elements that are to be collected from clients served by certain types of programs. Recommended data collection steps, required response categories, and suggested question wording are provided for each universal and program-specific data element, and, when appropriate, there is a discussion of special issues. Section 4 of the Notice describes the HMIS privacy and security standards for data confidentiality and security that apply to an HMIS and programs that collect, use, or process HMIS data. Finally, Section 5 addresses Technical standards for the creation of HMIS data systems.

1.1. The Benefits of a Local HMIS

The development of a local HMIS is about: (1) Bringing the power of computer technology to the day-to-day operations of individual homeless assistance providers; (2) knitting together providers within a local community in a more coordinated and effective housing and service delivery system for the benefit of homeless clients; and (3) obtaining and reporting critical aggregate information about the characteristics and needs of homeless persons.

An HMIS provides significant opportunities to improve access to, and delivery of, housing and services for people experiencing homelessness. An HMIS can accurately describe the scope of homelessness and the effectiveness of efforts to ameliorate it. An HMIS can strengthen community planning and resource allocation.

1.1.1. Benefits to Homeless Clients and Homeless Assistance Providers

An HMIS offers many specific benefits to homeless persons seeking assistance and the organizations that provide assistance. An HMIS offers front-line program staff tools for providing more effective client services through improved referrals, case management, and service coordination. If programs choose to share data about clients and services, program staff will be able to retrieve records of clients previously served, thereby streamlining the intake process. An HMIS reduces the frequency with which clients are required to complete intake forms and assessments. Homeless clients benefit directly from these service improvements as well as from the providers' improved ability to understand the needs of homeless persons and their use of homeless assistance resources.

1.1.2. Policy Makers and Planners

Local policy makers, planners, and advocates can use aggregated HMIS data to demonstrate the size and characteristics of the homeless population in their communities and improve their understanding of service usage patterns by that population. HMIS data can also be used to identify and address service delivery gaps within the CoCs and improve planners ability to link clients to mainstream programs that are essential to the prevention of homelessness and to sustaining formerly homeless people in permanent housing. Compared to other commonly used methods for gathering information on homeless persons, notably point-in-time census counts, HMIS allows local CoCs to obtain significantly better point-in-time and longitudinal data about homeless persons in their communities.

In addition, HMIS helps national policy makers and advocates to more effectively address homelessness. Congress has charged HUD with producing an Annual Homeless Assessment Report (AHAR) based on HMIS data. To carry out that responsibility, HUD has developed a representative sample of 80 jurisdictions that is helping those jurisdictions develop their HMIS, collect good quality data, and conduct analysis to support unduplicated counts of homeless service users and their characteristics at the local level. Analysis of HMIS data from the 80-jurisdiction sample will form the core of the AHAR and will enable Congress and HUD to better understand the needs of homeless persons and target Federal resources accordingly.

HUD also has responsibility for funding and monitoring several McKinney-Vento Act programs (42 U.S.C. 11301 et seq.). Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and the reporting of outcomes of Federal assistance in helping homeless people to become more independent. HMIS will make it possible for HUD to request—and grantees to more quickly generate—information for Annual Progress Reports (APRs) that will enable
HUD to report program results to Congress and the American public as required by the Government Performance Results Act and to meet its administrative and program responsibilities.

1.2. Statutory Authority

1.2.1. Direction to HUD on Homeless Management Information Systems

Over the past several years, Congress has expressed its concern for better local and national information about homeless persons through numerous conference and committee reports. Most recently, the Consolidated Appropriations Act of 2004 (Pub. L. 108–199, approved January 23, 2004) Conference Report (H.R. 108–401) stated: “The conferees reiterate the direction and reporting requirement included in the Senate Report regarding the collection and analysis of data to assess the effectiveness of the homeless system.”

Senate Report 108–143 stated:

The Committee remains supportive of the Department’s ongoing work on data collection and analysis within the homeless program. HUD should continue its collaborative efforts with local jurisdictions to collect an array of data on homelessness in order to analyze patterns of use of assistance, including how people enter and exit the homeless assistance system, and to assess the effectiveness of the homeless assistance system. The Committee directs HUD to take the lead in working with communities toward this end, and to analyze jurisdictional data within one year. The Committee directs HUD to report on the progress of this data collection and analysis effort by no later than May 13, 2003.

The Congress previously discussed the need for better data on homelessness in the Conference Report (H.R. Report 96–988) for Fiscal Year (FY) 2001 HUD Appropriations Act (Pub. L. 106–377, approved October 27, 2000). It stated:

The conferees reiterate and endorse language included in the Senate report regarding the need for data and analysis on the extent of homelessness and the effectiveness of McKinney Act programs.

* * * The conferees concur with the importance of developing unduplicated counts of the homeless at the local level, as well as taking whatever steps are possible to draw inferences from this data about the extent and nature of homelessness in the nation as a whole.

Likewise, the conferees agree that local jurisdictions should be collecting an array of data on homelessness in order to prevent duplicate counting of homeless persons, and to analyze their patterns of use of assistance, including how they enter and exit the homeless assistance system and the effectiveness of the systems. HUD is directed to take the lead in working with communities toward this end, and to analyze jurisdictional data within three years. Implementation and operation of Management Information Systems (MIS), and collection and analysis of MIS data, have been made eligible uses of Supportive Housing Program funds. The conferees direct HUD to report to the Committees within six months after the date of enactment of this Act on its strategy for achieving this goal, including details on financing, implementation, and maintaining the effort.

Congress directed HUD to take the lead in requiring every jurisdiction to have unduplicated client-level data within three years. The reasons for the emphasis and the specific directives on encouraging these systems were articulated in FY 2001 Senate Report 106–410:

The Committee believes that HUD must collect data on the extent of homelessness in America as well as the effectiveness of the McKinney homeless assistance programs in addressing this condition. These programs have been in existence for some 15 years and there has never been an overall review or comprehensive analysis on the extent of homelessness or how to address it. The Committee believes that it is essential to develop an unduplicated count of homeless people, and an analysis of their patterns of use of assistance (HUD McKinney homeless assistance as well as other assistance both targeted and not targeted to homeless people), including how they enter and exit the homeless assistance system and the effectiveness of assistance.

In the FY 1999 HUD Appropriations Act, Congress directed HUD to collect data from a representative sample of existing local HMIS. Specifically, House Report 105–610 stated that HUD should:

* Collect, at a minimum, the following data: the unduplicated count of clients served; client characteristics such as age, race, disability status, units (days) and type of housing received (shelter, transitional, permanent); and services rendered. Outcome information such as housing stability, income, and health status should be collected as well.

In the FY 2001 HUD appropriations process, Senate Report 106–410 directed HUD to build on its earlier preliminary work with communities with an advanced HMIS and continue assessing data from these communities:

To continue on an annual basis to provide a report on a nationally representative sample of jurisdictions whose local MIS data can be aggregated yearly to document the change in demographics of homelessness, demand for homeless assistance, to identify patterns in utilization of assistance, and to demonstrate the effectiveness of assistance.

The Committee instructs HUD to use these funds to contract with experienced academic institutions to analyze data and report to the agency, jurisdictions, providers, and the Committee on findings.

1.2.2 Direction to HUD and Other Federal Agencies on Homeless Data Collection

In addition to Congressional direction relating to HMIS, HUD, other Federal agencies and the Interagency Council on the Homeless are required under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and reporting on the outcomes of federal assistance in helping homeless people to become more independent.

The major Congressional imperatives in HUD’s McKinney-Vento Act programs are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of the services in nurturing efforts by homeless
persons to become more self-sufficient; and

- Reporting to Congress on the characteristics and effectiveness of Federal efforts to address homelessness.

Both individually and as a whole, these provisions provide statutory imperatives for collecting comprehensive data on homeless individuals and their needs. This section progresses from the most general of the statutory authorities to the most specific programmatic authorities.

**Interagency Council on the Homeless.** The McKinney-Vento Homeless Assistance Act directs the Interagency Council on the Homeless (ICH) to undertake a number of tasks on interagency coordination, evaluation, and reporting that mandate the collection and dissemination of information on homeless individuals and their needs:

(a) Duties.

- The Council shall—
  (1) Review all Federal activities and programs to assist homeless individuals;
  (2) Take such actions as may be necessary to reduce duplication among programs and activities by Federal agencies to assist homeless individuals;
  (3) Monitor, evaluate, and recommend improvements in programs and activities to assist homeless individuals conducted by Federal agencies, State and local governments, and private voluntary organizations;
  (4) Collect and disseminate information relating to homeless individuals;
  (5) Prepare the annual reports required in subsection (c)(2) of this section; (Section 202(a), McKinney-Vento Homeless Assistance Act).

Each Federal agency is required to report to the ICH: A description of each program to assist homeless individuals and the number of homeless individuals served by the program; impediments to use of the program by homeless individuals; and efforts by the agency to increase homeless assistance services. The ICH, in turn, is required to submit an annual report to the President and Congress that:

- Assess the nature and extent of the problems relating to homelessness and the needs of homeless individuals;
- Provides a comprehensive and detailed description of the activities and accomplishments of the Federal Government in resolving the problems and meeting the needs assessed pursuant to subparagraph (A); (Section 203(a), McKinney-Vento Homeless Assistance Act)

In the following excerpt from the 2001 Senate Report on the HUD Appropriations Act, at page 53, Congress further directed the revitalized ICH to assess how mainstream programs can prevent homelessness.

ICH to assess how mainstream programs can prevent homelessness.

The committee also recognizes that homelessness cannot be cured by homeless assistance providers alone—it requires the involvement of a range of Federal programs. Accordingly, it has included $500,000 for staffing of the Interagency Council on the Homeless. It instructs the Council specifically to require HUD, HHS, Labor, and VA to quantify the number of their program participants who become homeless, to address ways in which mainstream programs can prevent homelessness among those they serve, and to describe specifically how they provide assistance to people who are homeless

**Comprehensive Housing Affordability Strategy/Consolidated Plan.** Every jurisdiction that receives funding from certain HUD programs (HOME, Community Development Block Grant, Housing Opportunities for Persons with AIDS, Emergency Shelter Grants) must submit a comprehensive housing strategy that includes a Consolidated Plan section dealing with homeless needs and an analysis of impediments to fair housing choice. Every jurisdiction is required to:

- Describe the nature and extent of homelessness, including youth homelessness, within the jurisdiction, providing an estimate of the special needs of various categories of persons who are homeless or threatened with homelessness, including tabular presentation of such information; and a description of the jurisdiction’s strategy for (A) helping low-income families avoid becoming homeless; (B) addressing the emergency shelter and transitional housing needs of homeless persons (including a brief inventory of facilities and services that meet such needs within that jurisdiction); and (C) helping homeless persons make the transition to permanent housing and independent living. (Section 105(a)(2), Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12701 et seq.)

The implementing regulations and administrative directions detail how the 50 states, Puerto Rico, the U.S. territories and over 1000 metropolitan cities and urban counties present narratives and data tables on homeless needs, current services, and the plans to address and prevent homelessness.

**HUD’s McKinney-Vento Act Program Requirements.** The McKinney-Vento Act contains a consistent philosophy and an accompanying set of statutory mandates concerning the framework for assessing homeless needs and addressing them with appropriate services. The McKinney-Vento Act also recognizes the importance of ensuring confidentiality in recordkeeping and public disclosure of information concerning homeless persons seeking domestic violence shelter and services. In addition, all of HUD’s McKinney-Vento Act assistance must be consistent with the local jurisdiction’s Consolidated Plan. Emergency Shelter Grant (ESG) Program. Each governmental and nonprofit recipient of ESG funds is required to certify to HUD that it will undertake certain responsibilities regarding the provision of services, including that:

* * * * *

(3) I will assist homeless individuals in obtaining—

- Appropriate supportive services, including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- Other Federal, State, local, and private assistance available for such individuals;

* * * * *

(5) It will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under this subtitle and that the address or location of any family violence shelter project assisted under this subtitle will, except with written authorization of the person or persons responsible for the operation of such shelter, not be made public;

(b) Activities undertaken by the recipient with assistance under this subtitle are consistent with any housing strategy submitted by the grantees in accordance with Section 105 of the Cranston-Gonzalez National Affordable Housing Act (Sections 415(c)(3), (5) and (6), McKinney-Vento Homeless Assistance Act).

**Supportive Housing Program.** The Supportive Housing Program (SHP) funds transitional and permanent supportive housing and supportive services only projects that require grant recipients to collect specific information from clients concerning their qualification for services, their service needs, and progress toward assisting clients to independent living. HUD requires projects to report on the number and characteristics of clients served and their outcomes.

The statute provides that:

(a) IN GENERAL—To the extent practicable, each project shall provide supportive services for residents of the project and homeless persons using the project, which may be designed by the recipient or participants.

(b) REQUIREMENTS—Supportive services provided in connection with a project shall address the special needs of individuals (such as homeless persons with disabilities and homeless families with children) intended to be served by a project (Section 425(a) and (b), McKinney-Vento Homeless Assistance Act).

The McKinney-Vento Act requires every project in the Supportive Housing
Program to conduct an on-going assessment of client needs for services and their availability for the client. This information is necessary to assess the progress of the project in moving clients to independent living and to report to HUD. In addition, special protections on confidentiality of recordkeeping involving persons provided domestic violence services are specified.

Section 426 of the McKinney-Vento Homeless Assistance Act provides that—

(c) REQUIRED AGREEMENTS—The Secretary may not provide assistance for any project under this subtitle unless the applicant agrees—

(1) To operate the proposed project in accordance with the provisions of this subtitle;

(2) To conduct an ongoing assessment of the supportive services required by homeless individuals served by the project and the availability of such services to such individuals;

(3) To provide such residential supervision as the Secretary determines is necessary to facilitate the adequate provision of supportive services to the residents and users of the project;

(4) To monitor and report to the Secretary on the progress of the project;

(5) To develop and implement procedures to ensure (A) the confidentiality of records pertaining to any individual provided family violence prevention or treatment services through any project assisted through this subtitle, and (B) that the address or location of any family violence shelter project assisted under this subtitle will not be made public, except with written authorization of the person or persons responsible for the operation of such project;

(7) To comply with such other terms and conditions as the Secretary may establish to carry out this subtitle in an effective and efficient manner.

Shelter Plus Care (S+C) Program. The Shelter Plus Care (S+C) Program funds tenant-, sponsor-, and project-based rental assistance and rental assistance in connection with moderate rehabilitation for single-room occupancy units in conjunction with supportive services funded from other sources for homeless persons with disabilities. Specific information is required to establish both the initial disability status of the client to enter the program and to ensure that appropriate supportive services are provided during the full term of the program to address the needs of the client and to meet the match requirement of the program.

Section 454(b) of the McKinney-Vento Homeless Assistance Act provides in part that:

(e) MINIMUM CONTENTS—The Secretary shall require that an application identify the need for the assistance in the community to be served and shall contain at a minimum—

* A description of the size and characteristics of the population of eligible persons;

* The identity of the proposed service provider or providers;

* A description of the supportive services that the applicant proposes to assure will be available for eligible persons;

* A description of the mechanisms for developing a housing and supportive services plan for each person and for monitoring each person’s progress in meeting that plan.

The McKinney-Vento Act also requires recipients to provide for ongoing client assessments and provision of needed services. Section 456 states that the Secretary may not approve assistance under this subtitle unless the applicant agrees—

(1) To operate the proposed program in accordance with the provisions of this subtitle;

(2) To conduct an ongoing assessment of the housing assistance and supportive services required by the participants in the program;

(3) To assure the adequate provision of supportive services to the participants in the program.

1.3. Development of Systems and Software

With Congressional support, HUD has been encouraging local CoCs to implement HMIS. Since 2001, the implementation of HMIS has been a fundable activity for CoCs under the Supportive Housing program and since 2002, making progress towards implementing an HMIS has been part of HUD’s review of the CoC applications.

Before implementation of an HMIS became a federal initiative, some communities had already developed sophisticated client-level information systems based on the technology of the time. Some of these were management systems for large local government programs (e.g., New York, Philadelphia). Others linked decentralized service providers around a centralized bed-registration (e.g., St. Louis) or an information and referral system. The success of these pioneering systems has prompted an increasing number of CoCs to develop similar systems to meet the needs of their clients and participating service providers. Software companies are developing specialized systems capable of documenting client demographic data, storing information on clients and on case management or treatment plans, identifying available services and tracking referrals, and monitoring service provision, progress, outcomes, and follow-up.

Reflecting experiences at both local and national levels to develop and test first-generation HMIS software, today’s most advanced HMIS software combines a number of functions to enhance individual service provider operations and to link providers together into a broader CoC data system. These functions include:

Client Profile: Client demographic data obtained at intake and exit.

Client Assessment: Information on clients’ needs and goals, as well as case management or treatment plans.

Service Outcomes: Client-level data on services provided, progress, outcomes, and follow-up.

Information and Referral/Resource Directories: Timely data on the network of available services within the Continuum to determine eligibility and provide referrals. Some systems provide documentation and tracking of referrals from one provider to the next and messaging capability.

Operations: Operational functionality that permits staff to manage day-to-day activities, including bed availability, and incident reporting.

Accounting: Traditional accounting tools and special components to record service activity/expenditures against specific grants. Some systems have donor and fundraising elements.

Thus, HMIS software provides local providers and agencies not only with comprehensive information on the nature of homelessness in their communities, but also with the ability to generate reports on their internal operations and for various funders. Because each participating provider agrees to share certain information with the HMIS central server, it also offers the capacity to generate reports on the operations of the CoC system as a whole.

One of HUD’s major goals in this HMIS initiative is to help individual homeless service providers access the very best computer technology to assist them in their day-to-day operations and to help increase the effective coordination of services in the CoC. To this end, HUD has developed several publications to assist local jurisdictions including: Homeless Management Information System Consumer Guide: A Review of Available HMIS Solutions, January 2003; and Homeless Management Information Systems: Implementation Guide, September 2002. These guides can be found at: http://www.hud.gov/offices/cpd/homeless/hmis/guide. HUD is also preparing a
Program-specific data elements should be collected from all clients served by programs that are required to report this information to HUD or other organizations. For programs with no such reporting requirement, these standards are recommended to allow data across all local programs to be easily analyzed. For programs that receive funding through HUD's SHP, S+C Program, and Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program, as well as HOPWA-funded homeless programs, most program-specific data elements are required to complete APRs. Exceptions to this requirement may occur in outreach programs to the street homeless or other nonresidential-based services such as soup kitchens. In such cases, an intake is often not taken, or even possible, and no information is required to access the service.

Data elements required to assess operations and outcomes of programs include private or sensitive information on topics such as income, physical disabilities, behavioral health status, and whether the client is currently at risk of domestic violence. As described in Section 4, CoCs will have to establish firm policies and procedures to protect against unauthorized disclosure of personal information. Section 3 of this Notice provides more detail on the standards for program-specific data elements.

1.4.3. Data Collection and Reporting

As will be discussed further in Sections 2 and 3, the data standards establish uniform definitions for the types of information to be collected but not uniform protocols for how the data are to be collected. With some exceptions, the data need not be collected at a standard point in time during intake, assessment, or provision of services, as programs differ in the ways in which these functions are performed. The intent is not to add the administration of a survey questionnaire to other program activities, but rather to ensure that information with standardized meaning is entered into the HMIS.

Providers will be required to report the client-level data specified in this Notice on a regular basis to a central data storage facility in order to make it possible for the CoC to eliminate duplicate records and analyze the data for local planning purposes. The CoC will be responsible for aggregating the data and preparing an unduplicated local count of homeless persons and a description of their characteristics and patterns of service use. The CoC must retain the data for a period of seven years, adhering to the security provisions set forth in Section 4 of this Notice. An HMIS should have the ability to record client data from a limitless number of service transactions for longitudinal data analysis and assessment of client outcomes (often referred to as a "transactional" or "relational" database structure). The maintenance of historical data is discussed in Section 5 of this Notice.

1.4.4. Additional HMIS Data Elements

Particular programs (or the entire local CoC) may wish to collect assessment, service tracking, and outcome information in more detail than required by the uniform HMIS standards. For example, with regard to behavioral health, a program may wish to capture significantly more information about a client's psychiatric history or current status than is specified under the program-specific data elements. Such elective data elements are developed at the discretion of each CoC.

Just as is the case for the universal data elements and program-specific data elements, the collection of additional data within the HMIS is subject to privacy and fair housing laws and practices.

1.5. Other HMIS Provisions

1.5.1. Participation Requirements for Providers Receiving HUD McKinney-Vento Act Funding

Given the benefits of an HMIS for providing accurate estimates of the homeless population and its needs and improving housing and service provision at the local level, all recipients of HUD McKinney-Vento Act program funds are expected to participate in an HMIS. The HUD McKinney-Vento Act programs include ESG, SHP, S+C, and Section 8 Moderate Rehabilitation for SRO. In the FY 2003 funding notices for the SHP, S+C, and Section 8 Moderate Rehabilitation for SRO programs, HUD announced that providing data to an HMIS is a condition of funding for grantees.

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.

1.5.2. Participation Requirements for HOPWA-Funded Homeless Projects

Projects that receive HOPWA funding and target homeless persons are
required to participate in HMIS. Such projects involve efforts to: provide outreach and assess the needs of persons with HIV/AIDS who are homeless; provide housing and related supportive services; and conduct project evaluation activities for this sub-population. HOPWA projects that assist persons who are homeless but do not target this sub-population are not required to participate in HMIS. However, such projects are encouraged to consider the benefits of an HMIS in coordinating assistance for clients and in reporting to funders. HOPWA projects that target homeless persons are required to integrate efforts within their Continuum of Care, including the use of the HMIS.

As noted in Section 3 (data element 3.5: HIV/AIDS), the HMIS standards will require the collection of information on a client’s HIV/AIDS status. Such information is covered by confidentiality requirements. As in other areas involving sensitive or protected client information, information should be recorded only when a program or project has adequate data confidentiality protections. These protections include agency policies and procedures and staff training to ensure that HIV-related information cannot be learned by anyone without the proper authorization.

1.5.3. Annual Progress Reports

Recipients of funds under the SHP, S+C, Section 8 SRO and HOPWA Programs are required to submit APRs to HUD. The Notice provides guidance for how to use HMIS data in submitting the current version of the APR. Homeless shelter and service providers receiving funds under the Emergency Shelter Grant (ESG) program are required to participate in an HMIS if the provider is located in a jurisdiction covered by a CoC with an HMIS. Entitlement communities and states are not required to set up an HMIS for homeless providers receiving ESG funds in jurisdictions not covered by a CoC HMIS.

HUD intends at some point to use an APR driven by HMIS data to measure the performance of both McKinney-Vento Act program grantees and CoCs more generally. Prior to implementation of performance-based measures, performance indicators would be developed through a process of consultation with homeless service providers. 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.

CoCs and software developers would be given sufficient time to adopt enhancements to their systems to accommodate new outcome indicators.

1.5.4. Sharing HMIS Data Among Providers Within a CoC

While local providers will be required to report client-level data to a CoC’s central data storage facility on a regular basis, sharing of HMIS data among providers within the CoC is not required by HUD and is at the discretion of each CoC and its providers. In communities where data are shared, providers may choose to share all of the information that is collected about clients or limit that information to a small number of data elements. Where there is limited data sharing, providers should allow access to at least the clients’ names, SSNs, and birthdates in order to prevent the creation of duplicate client records within the CoC. HUD encourages data sharing among providers within a Continuum of Care as sharing of HMIS information allows 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. (Section 2 discusses how communities can obtain an unduplicated count of homeless persons when data are not shared.)

1.5.5. Access To HMIS Data Outside the Local Continuum of Care

The HMIS initiative is not a federal effort to track homeless people and their identifying information beyond the local level. HUD has no plans to develop a national client-level database with personal identifiers of homeless service users, having concluded that such an endeavor would create serious impediments to provider participation in local HMIS.

To produce the AHAR, HUD will request aggregated data produced by local HMIS analysts responsible for the 80 jurisdictions in the AHAR sample as well as self-selected non-sample jurisdictions that have a high proportion of homeless assistance providers contributing data to their local HMIS. The aggregated data will represent an unduplicated count of client records at the CoC level. There will be no use of protected personal identifiers to de-duplicate records across CoCs.

Any research on the nature and patterns of homelessness that uses client-level HMIS data will take place only on the basis of specific agreements between researchers and the entity that administers the HMIS. These agreements must reflect adequate standards for the protection of confidentiality of data and must comply with the disclosure provisions in Section 4 of this final Notice. For example, such agreements will be necessary if any of the jurisdictions included in the AHAR sample choose to report client-level data to the organizations conducting the AHAR analysis for HUD rather than reporting aggregated data. Under no circumstances will any identifiers be shared with the Federal Government under these special arrangements. For more information on the AHAR research project, see HUD’s Web site at http://www.hud.gov/offices/cpd/homeless/hmis/standards/hmisfaq.pdf.

1.5.6. Special Provisions for Domestic Violence Shelters

Domestic violence shelters and other programs that assist victims of domestic violence play an important role in many CoCs and have received significant funding through local Continuums. Victims of domestic violence are also served in many general purpose programs funded by HUD. HUD is aware of, and is sensitive to, the data confidentiality and security concerns that many domestic violence programs have with respect to their participation in a local HMIS.

At the same time, HUD recognizes that HMIS can provide valuable data concerning domestic violence victims’ needs, and localities have been able to greatly improve their service delivery to this vulnerable population. In communities across the country, domestic violence programs are already providing data to local HMIS. The key to participation hinges on the availability of sophisticated HMIS software that addresses data security issues and the development of protocols within programs for data security, confidentiality, and sharing that satisfy the concerns of domestic violence programs.

After careful review, HUD has determined that it will require domestic violence programs that receive HUD McKinney-Vento funds to participate in local HMIS. HUD expects domestic violence programs that receive HUD McKinney-Vento funds to implement the universal and, where applicable, program-specific data elements described in this final Notice. Adopting these standards is essential if domestic violence programs are to comply with HUD reporting requirements. CoC representatives are instructed to meet with domestic violence program staff in their communities with the goal of developing procedures and protocols that will provide the necessary safeguards for victims of domestic
violence and address the concerns of domestic violence programs. All HMIS data is subject to the privacy and security standards set forth in Section 4 of this Notice.

HUD is prepared to provide extensive technical assistance to communities to develop the best possible solutions for domestic violence victims and providers. Given that it may take additional time to reach agreement in communities where domestic violence programs do not presently provide data, HUD will permit CoCs to stage the entry of domestic violence programs last, including after the October 2004 goal for HMIS implementation. The later staging of entry into the HMIS by domestic violence programs will be taken into account in HUD's assessment of CoC progress in HMIS implementation in the national CoC competitive ranking process.

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. It is expected that all CoCs will make progress toward meeting the Congressional direction for implementation of HMIS by October 2004. As shown in the chart, a CoC's first priority is to bring on board emergency shelters, transitional housing programs, and outreach programs. Providers of emergency shelter, transitional housing, and homeless outreach services should be included in the HMIS as early as possible, regardless of whether they receive funding through the McKinney-Vento Act or from other sources.

As a second priority, HUD encourages CoCs to actively recruit providers of permanent supportive housing funded by HUD McKinney-Vento Act programs and other HUD programs. As a third priority, CoCs should recruit homelessness prevention programs, Supportive Services Only programs funded through HUD's Supportive Housing Program, and non-federally funded permanent housing programs.

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 the proposed HMIS data elements for this Notice. HUD continues to work with those agencies to maximize standardization of McKinney-Vento Act reporting requirements and to broaden adoption of HMIS-based data.

Efforts to recruit providers into the HMIS will require local HMIS designers to make trade-offs between the desirability of including as many homeless service providers as early as possible and the feasibility of obtaining high quality data. At the same time, given the benefits of HMIS to clients, service providers, and the larger CoC system, a high degree of coverage is both desirable and advantageous.
# Priority Participation in HMIS

## By Program Type

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Outreach To Street</th>
<th>Emergency</th>
<th>Transitional</th>
<th>Permanent Supportive Housing</th>
<th>Homeless Prevention</th>
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1 The Department expects that communities will set priorities for HMIS participation by beginning with activities designated as “1”, then “2” and finally “3.”

2 Supportive Service Only programs funded under SHP are designated as “3” priority for HMIS participation.
2. Data Standards For Universal Data Elements

The universal data elements should be collected by all agencies serving homeless persons. HUD carefully weighed the reporting burden of the universal data elements against the importance of the information for producing meaningful local and Federal reports. Of special concern to HUD was the reporting burden for programs that register large numbers of applicants on a daily basis, with little time to collect information from each applicant. As a result, the number of universal data elements was kept to a minimum, and the ease of providing the information requested and whether or not many homeless service providers were already collecting such information was considered for each element.

The universal data standards will make possible unduplicated estimates of the number of homeless people accessing services from homeless providers, basic demographic characteristics of people who are homeless, and their patterns of service use. The universal data standards will also allow measurement of the number and share of chronically homeless people who use homeless services. The standards will enable generation of information on shelter stays and homelessness episodes over time. The universal data elements are:

2.1: Name
2.2: Social Security Number
2.3: Date of Birth
2.4: Ethnicity and Race
2.5: Gender
2.6: Veteran Status
2.7: Disabling Condition
2.8: Residence Prior to Program Entry
2.9: Zip Code of Last Permanent Address
2.10: Program Entry Date
2.11: Program Exit Date
2.12: Unique Person Identification Number
2.13: Program Identification Number
2.14: Household Identification Number

Data elements 2.1 through 2.9 require that staff from a homeless assistance agency enter information provided by a client into the HMIS database. Data elements 2.1 to 2.5 only need to be collected the first time a client uses a program offered by a provider or, within a CoC that shares local HMIS data, uses a program offered by any provider in that community. If some of this information is not collected the first time a client accesses services or is inaccurate, it may be added or corrected on subsequent visits. Data elements 2.6 to 2.9 may need to be collected in subsequent visits as this information can change over time. However, the new information that changes over time should be captured without overwriting the information collected previously.

The next two elements, 2.10 and 2.11, are entered by staff (or computer-generated) every time a client enters or leaves a program. Elements 2.12 to 2.14 are automatically generated by the data collection software, although staff inquiries are essential for the proper generation of these elements. Data elements 2.13 and 2.14 need to be generated for each program entry. Exhibit 1 at the end of this section summarizes the above information for each universal data element.

The next two questions for obtaining the required information, although recommended questions are provided in Exhibit 2 at the end of this section. Providers have the flexibility to tailor data collection questions and procedures to their circumstances as long as the information is accurately and consistently collected given the response categories and definitions provided. As discussed in Section 4, HUD requires that clients be notified of the purpose for which the information is being collected and the ways in which the client may benefit from providing this information.

The response categories are required and the HMIS application must include the exact response categories that are presented in this section. For each data element, a definition indicating the type of information to be collected and the response categories are shown separately. Exhibit 3, at the end of this section, summarizes the required response categories for all the universal data elements. Section 5 of this Notice, Technical Standards, discusses approaches for handling missing response categories throughout the HMIS application.

All universal data elements must be obtained from each adult and unaccompanied youth who applies for a homeless assistance service. Most universal data elements are also required of children under age 18 in a household. Where a group of persons apply for services together (as a household or family), information about any children under the age of 18 in the household can be provided by the household head who is applying for services. The children do not need to be present at the time the household head applies for services. However, information should not be recorded for children under age 18 if it is indicated that these children will not be entering the program on the same day as the household head. Information for these children should be recorded when the children join the program. Information on any other adults (18 years of age or older) who are applying for services as part of the household will be obtained directly from that adult. Generally, one adult should not provide information for another adult.

All identifying information, including data elements 2.1 (Name), 2.2 (SSN), 2.3 (Date of Birth), 2.9 (Zip Code of Last Permanent Address), 2.10 Program Entry Date, 2.11 (Program Exit Date), 2.12 (Unique Person Identification Number), and 2.13 (Program Identification Number) need to have special protections to ensure the data are unusable by casual viewers. HMIS user access to this information will be highly restricted in accordance with Section 4 of this Notice.

2.1. Name

Rationale: The first, middle, last names, and suffix should be collected to support the unique identification of each person served.

Data Source: Client interview or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Definition and Instructions: Four fields should be created in the HMIS database to capture the client's full first, middle, and last names and any suffixes (e.g., John David Doe, Jr.). Try to obtain legal names only and avoid aliases or nicknames. Section 5 of this Notice discusses how to treat missing information for open-ended questions.

Required Response Categories:

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1. Name</td>
</tr>
<tr>
<td>Response categories</td>
</tr>
<tr>
<td>Current name</td>
</tr>
<tr>
<td>Other Name</td>
</tr>
<tr>
<td>Used to Receive Services previously.</td>
</tr>
<tr>
<td>First name</td>
</tr>
<tr>
<td>Middle name</td>
</tr>
<tr>
<td>Last name</td>
</tr>
<tr>
<td>Suffix.</td>
</tr>
<tr>
<td>First name</td>
</tr>
<tr>
<td>Middle name</td>
</tr>
<tr>
<td>Last name</td>
</tr>
<tr>
<td>Suffix.</td>
</tr>
</tbody>
</table>
### 2.1. Name

<table>
<thead>
<tr>
<th>Example</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>John</td>
</tr>
<tr>
<td></td>
<td>David</td>
</tr>
<tr>
<td></td>
<td>Doe</td>
</tr>
<tr>
<td></td>
<td>Jr.</td>
</tr>
</tbody>
</table>

**Special Issues:** This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Part 4 of this Notice.

#### 2.2. Social Security Number

**Rationale:** The collection of a client's Social Security Number (SSN) and other personal identifying information is required for two important reasons. First, unique identifiers are key to producing an accurate, unduplicated local count of homeless persons accessing services covered by HMIS. This is particularly critical in jurisdictions where homeless assistance providers do not share data at the local level and are, therefore, unable to use a Personal Identification Number to de-duplicate (at intake) across all the programs participating in the CoC's HMIS (see data element 2.12 for more information). Where data are not shared, CoCs must rely on a set of unique identifiers to produce an unduplicated count once the data are sent to the CoC or central server. Name and date of birth are useful unique identifiers, but these identifiers by themselves do not facilitate as accurate an unduplicated count of homeless persons as using SSN since names change and people share the same date of birth. Where data are shared across programs, SSN greatly improves the process of identifying clients who have been previously served and allows programs to de-duplicate upon program entry.

**Data Source:** Interview or self-administered form.

**When Data Are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All clients.

**Definitions and Instructions:** In one field, record the nine-digit Social Security Number. In another field, record the appropriate SSN data quality code.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Social Security number</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>/ / (example: 123 45 6789)</td>
</tr>
<tr>
<td></td>
<td>1 = Full SSN reported.</td>
</tr>
<tr>
<td></td>
<td>2 = Partial SSN reported.</td>
</tr>
<tr>
<td></td>
<td>8 = Don't know or don't have SSN.</td>
</tr>
<tr>
<td></td>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SSN data quality code</th>
</tr>
</thead>
</table>

**Special Issues:** Although the HMIS application’s data entry form may include hyphens or back slashes within the SSN to improve readability, one alphanumeric field without hyphens should be created within the HMIS database. Ideally, if only a partial SSN is recorded, the database should fill in the missing numbers with blanks so that the provided numbers are saved in the correct place of the Social Security Number. (For example, if only the last four digits of the SSN, “1234” are given, it should be stored as “1234” and if only the first three digits are provided, it should be stored as “123”.) This will allow maximum matching ability for partial SSNs.

Under Federal law (5 U.S.C. 552a), a government agency cannot deny shelter or services to clients who refuse to provide their SSN, unless the requirement was in effect before 1975 or SSN is a statutory requirement for receiving services from the program. This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

#### 2.3. Date of Birth

**Rationale:** The date of birth can be used to calculate the age of persons served at time of program entry, to calculate the approximate year of birth. If a client cannot remember the date of birth, the person’s age and calculate the approximate year of birth. If a client cannot remember the month or day of birth, communities may record an approximate date of “01” for both the month and “01” for day since this approximation is a best practice among data users.

**Data Source:** Client interview or self-administered form.

**When Data Are Collected:** Upon initial program entry or as soon as possible thereafter.

**Subjects:** All clients.

**Definitions and Instructions:** Collect the month, day, and year of birth for every person served. If a client cannot remember the year of birth, ask the person’s age and calculate the approximate year of birth. If a client cannot remember the month or day of birth, communities may record an approximate date of “01” for both the month and “01” for day since this approximation is a best practice among data users.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Date of birth</th>
<th>(Month) (Day) (Year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(e.g., 09/31/1965).</td>
<td></td>
</tr>
</tbody>
</table>
Special Issues: One date-format field for birth dates should be created in the HMIS database. This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.4. Ethnicity/Race

Rationale: Ethnicity and race are used to count the number of homeless persons who identify themselves as Hispanic or Latino and to count the number of homeless persons who identify themselves within five different racial categories. In the October 30, 1997 issue of the Federal Register (62 FR 58782), the Office of Management and Budget (OMB) published “Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.” All existing Federal recordkeeping and report requirements must be in compliance with these Standards as of January 1, 2005. The data standards in this Notice follow the OMB guidelines and can be used to complete HUD form 27061.

Data Source: Interview or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Definitions and Instructions: In separate data fields, collect both the self-identified Hispanic or Latino ethnicity and the self-identified race of each client served. Allow clients to identify multiple racial categories. Staff observations should not be used to collect information on ethnicity and race.

2.4.1. Ethnicity

The definition of Hispanic or Latino ethnicity is a person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture of origin, regardless of race.

2.4.2. Race

Definitions of each of the race categories are as follows:

1. American Indian or Alaska Native is a person having origins in any of the original peoples of North and South America, including Central America, and who maintains tribal affiliation or community attachment.

2. Asian is a person having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, and Vietnam.

3. Black or African American is a person having origins in any of the black racial groups of Africa. Terms such as “Haitian” or “Negro” can be used in addition to “Black or African American.”

4. Native Hawaiian or Other Pacific Islander is a person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

5. White is a person having origins in any of the original peoples of Europe, the Middle East or North Africa.

Required Response Categories:

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.4.—Ethnicity and race</td>
</tr>
<tr>
<td>Response categories</td>
</tr>
<tr>
<td>Ethnicity ............. 0 = Non-Hispanic/Latino.</td>
</tr>
<tr>
<td>Race ................... 1 = Hispanic/Latino.</td>
</tr>
<tr>
<td>1 = American Indian or Alaska Native.</td>
</tr>
<tr>
<td>2 = Asian.</td>
</tr>
<tr>
<td>3 = Black or African-American.</td>
</tr>
<tr>
<td>4 = Native Hawaiian or Other Pacific Islander</td>
</tr>
<tr>
<td>5 = White</td>
</tr>
</tbody>
</table>

2.5. Gender

Rationale: To create separate counts of homeless men and homeless women served.

Data Source: Interview, observation, or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All clients.

Data definitions and instructions: Record the gender of each client served.

Required Response Categories:

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.5 Gender</td>
</tr>
<tr>
<td>Response categories</td>
</tr>
<tr>
<td>0 = Female.</td>
</tr>
<tr>
<td>1 = Male.</td>
</tr>
</tbody>
</table>

2.7. Disabling Condition

Rationale: Disability condition is needed to help identify clients meeting HUD’s definition of chronically homeless and, depending on the source of program funds, may be required to establish client eligibility to be served by the program.

Data Source: Client interview, self-administered form, observation, or assessment. Where disability is a statutory or regulatory eligibility criteria, the data source is the evidence required by the funding source.

When Data Are Collected: At any time after the client has been admitted into the program.

Subjects: All adults served.

Definition and Instructions: For this data element, a disabling condition means: (1) A disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes an individual’s ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions; (3) a developmental disability as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; (4) the disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; or (5) a diagnosable substance abuse disorder.

Required Response Categories:

<table>
<thead>
<tr>
<th>UNIVERSAL DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.7 Disabling condition</td>
</tr>
<tr>
<td>Response categories</td>
</tr>
<tr>
<td>0 = No.</td>
</tr>
<tr>
<td>1 = Yes.</td>
</tr>
<tr>
<td>8 = Don’t Know.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>
Special Issues: Homeless service providers must separate the client intake process for program admission from the collection of disability information in order to comply with Fair Housing laws and practices, unless this information is required to determine program eligibility.

For the purposes of defining an adult that meets HUD’s definition of chronically homeless, programs should use the Disabling Condition data element along with: Date of Birth (to determine that the person is 18 years of age or older); Household Identification Number (to identify unaccompanied individuals); and Residence Prior to Program Entry or prior information on Program Entry and Program Exit dates (to determine the number of episodes of homelessness and length of time a person is homeless).

2.8 Residence Prior to Program Entry

Rationale: To identify the type of residence and length of stay at that residence just prior to program admission.

Data Source: Interview or self-administered form.

When Data Are Collected: At any time after the client has been admitted into the program.

Subjects: All adults and unaccompanied youth served.

Definition and Instructions: In separate fields, determine the type of living arrangement the night before entry into the program and the length of time the client spent in that living arrangement.

Required Response Categories:

<table>
<thead>
<tr>
<th>response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher).</td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons (including homeless youth).</td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab).</td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility.</td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center.</td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric).</td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility.</td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent.</td>
</tr>
<tr>
<td>11 = Apartment or house that you own.</td>
</tr>
<tr>
<td>12 = Staying or living in a family member’s room, apartment, or house.</td>
</tr>
<tr>
<td>13 = Staying or living in a friend’s room, apartment, or house.</td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher.</td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home.</td>
</tr>
<tr>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside).</td>
</tr>
<tr>
<td>17 = Other.</td>
</tr>
<tr>
<td>8 = Don’t Know.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
<tr>
<td>1 = One week or less.</td>
</tr>
<tr>
<td>2 = More than one week, but less than one month.</td>
</tr>
<tr>
<td>3 = One to three months.</td>
</tr>
<tr>
<td>4 = More than three months, but less than one year.</td>
</tr>
<tr>
<td>5 = One year or longer.</td>
</tr>
</tbody>
</table>

Special Issues: For APR reporting purposes, programs should use the following coding approach to conform with the response categories in the current APR:

CROSS-WALK OF HMIS AND APR RESPONSE CATEGORIES FOR RESIDENCE PRIOR TO PROGRAM ENTRY

<table>
<thead>
<tr>
<th>response category in the final notice</th>
<th>corresponding response categories in the current APR</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Emergency shelter</td>
<td>b = Emergency Shelter.</td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons</td>
<td>c = Transitional housing for homeless persons.</td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons</td>
<td>k = Other.</td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility*</td>
<td>d = Psychiatric facility.</td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center*</td>
<td>e = Substance abuse treatment facility.</td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric)*</td>
<td>f = Hospital.</td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility*</td>
<td>g = Jail/prison.</td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td>k = Other.</td>
</tr>
<tr>
<td>9 = Refused</td>
<td>k = Other.</td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent</td>
<td>i = Rental housing.</td>
</tr>
<tr>
<td>11 = Apartment or house that you own</td>
<td>k = Other.</td>
</tr>
<tr>
<td>12 = Staying or living in a family member’s room, apartment, or house</td>
<td>i = Living with relatives/friends.</td>
</tr>
<tr>
<td>13 = Staying or living in a friend’s room, apartment, or house</td>
<td>i = Living with relatives/friends.</td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher</td>
<td>k = Other.</td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home</td>
<td>k = Other.</td>
</tr>
<tr>
<td>16 = Place not meant for habitation</td>
<td>a = Non-housing.</td>
</tr>
<tr>
<td>17 = Other</td>
<td>k = Other.</td>
</tr>
</tbody>
</table>
In addition, for response categories marked with an asterisk (*), if the client came from one of these institutions but was there for less than 30 days and was living in an emergency shelter or in a place not meant for habitation prior to entry, the client should be counted for APR reporting purposes in either the “emergency shelter” or “place not meant for habitation” categories, as appropriate.

This standard does not preclude the collection of residential history information beyond the residence experienced the night prior to program admission.

2.9 Zip Code of Last Permanent Address

Rationale: To identify the former geographic location of persons experiencing homelessness.

Data Source: Interview or self-administered form.

When Data Are Collected: Upon initial program entry or as soon as possible thereafter.

Subjects: All adults and unaccompanied youth.

Definition and Instructions: In one field, record the five-digit zip code of the apartment, room, or house where the client last lived for 90 days or more. In another field, record the appropriate Zip data quality code.

Required Response Categories:

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.9 Zip code of last permanent residence</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zip Code ..................................</td>
<td>(e.g., 12345)</td>
</tr>
<tr>
<td>Zip Data Quality Code</td>
<td>1 = Full Zip Code Recorded.</td>
</tr>
<tr>
<td></td>
<td>2 = Don't Know.</td>
</tr>
<tr>
<td></td>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

Special Issues: This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.10 Program Entry Date

Rationale: To determine the length of stay in a homeless residential program or the amount of time spent participating in a services-only program.

Data Source: Recorded by the staff responsible for registering program entrants.

When Data Are Collected: Upon any program entry (whether or not it is an initial program entry).

Subjects: All clients.

Definition and Instructions: Record the month, day, and year of first day of service of program entry. For a shelter visit, this date would represent the first day of residence in a shelter program following residence outside of the shelter or in another program. For services, this date may represent the day of program enrollment, the day a service was provided, or the first date of a period of continuous participation in a service (e.g., daily, weekly or monthly).

There should be a new program entry date (and corresponding program exit date) for each period/episode of service. Therefore, any return to a program after a break in treatment, completion of the program, or termination of the program by the user or provider must be recorded as a new program entry date. A definition of what constitutes a break in the treatment depends on the program and needs to be defined by program staff. For example, programs that expect to see the same client on a daily (or almost daily) basis may define a break in treatment as one missed day that was not arranged in advance or three consecutive missed days for any reason. Treatment programs that are scheduled less frequently than a daily basis may define a break in treatment as one or more missed weekly sessions.

Required Response Categories:

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.10 Program entry date</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>/ / / (example: 01/30/2004. (Month) (Day) (Year)).</td>
</tr>
</tbody>
</table>

Special Issues: This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.11 Program Exit Date

Rationale: To determine the length of stay in a homeless residential program or the amount of time spent participating in a services-only program.

Data Source: Recorded by the staff responsible for monitoring program utilization or conducting exit interviews.

When Data Are Collected: Upon any program exit.

Subjects: All clients.

Definition and Instructions: Record the month, day and year of last day of service. For a program providing housing or shelter to a client, this date would represent the last day of residence in the program’s housing before the client transfers to another residential program or leaves the shelter. For example, if a person checked into an overnight shelter on January 30, 2004, stayed over night and left in the morning, the last date of service for that shelter stay would be January 31, 2004. To minimize staff and client burden at shelters that require most (or all) clients to reapply for service on a nightly basis, the provider can enter the entry and exit date at the same time and can specify software that automatically enters the exit date as the date after the entry date for clients of the overnight program.

For services, the exit date may represent the last day a service was provided or the last date of a period of continuous service. For example, if a person has been receiving weekly counseling as part of an ongoing treatment program and either formally terminates his or her involvement or fails to return for counseling, the last date of service is the date of the last counseling session. If a client uses a service for just one day (i.e., starts and stops before midnight of same day, such as an outreach encounter), the entry and exit date would be the same date.

Required Response Categories:

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.11 Program exit date</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>/ / / (example: 01/30/2004. (Month) (Day) (Year)).</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.12 Unique Person Identification Number

Rationale: Every client receiving homeless assistance services within a CoC is assigned a Personal Identification Number (PIN), which is a permanent and unique number generated by the HMIS application. The PIN is used to obtain an unduplicated count of persons served within a CoC. The PIN is the only identifier that is guaranteed to be present and unique for each client served. A client may not have or may not know their SSN, while other identifying information such as name may be the same as another client’s.

Data Source: Where data are shared across programs in a CoC, staff will determine at intake whether a client has been assigned a PIN previously by any of the participating programs. To make this determination, the staff enters personal identifying information (Name,
SSN, Date of Birth, and Gender) into the HMIS application. The application then searches a CoC’s centralized database for matching records. If a match is found and a PIN is retrieved, the same PIN will be assigned to the client. If no matches are found, a new randomly generated PIN is assigned to the client.

Where data are not shared across programs, staff will similarly determine at intake whether a client has been assigned a PIN previously by their agency or program. If the client is found within their program records, the same PIN will be assigned to the client. If the client has not been served by their program previously, a PIN is randomly generated and assigned to the client. The PIN will allow programs to produce an unduplicated count of clients served by their program. Programs will provide client-level information on a regular basis to the CoC system administrators who are responsible for producing a CoC-wide unduplicated count.

When Data Are Collected: Upon program entry.

Subjects: All clients.

Definition and Instructions: Assign a unique ID number to each client served. The PIN is a number automatically generated by the HMIS application (see Section 5 of this Notice). The PIN will not be based on any client-specific information, but instead should be a randomly, computer-generated number.

Required Response Categories:

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.12 Personal Identification Number</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>A PIN must be created, but there is no required format as long as there is a single unique PIN for every client served in the CoC and it contains no personally identifying information.</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: This data standard should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.13 Program Identification Information

Rationale: Program identification information will indicate the geographic location of a program, its facility and CoC affiliation, and whether the program is a street outreach, emergency shelter, transitional housing, permanent supportive housing, homeless prevention, services-only or other type of program.

Data Source: Selected by staff from a list of programs available within a particular agency or the CoC. Upon selection of a program from the list, the HMIS application will assign the program identification information to every program event for each client.

When Data Are Collected: Upon any program entry (whether or not it is an initial program entry).

Subjects: All clients.

Definition and Instructions: The program identification information consists of four components that identifies the geographic location of a program Federal Information Processing Standards (FIPS code), its facility and CoC affiliation, and whether it is a street outreach, emergency shelter, transitional housing, permanent supportive housing, homeless prevention, services-only or other type of program. For each client, staff will only need to select the name of the program servicing the client. Staff will not need to view or have access to the actual program identification number. For some providers with only one program for all clients, the HMIS application can be specified to automatically generate the Program Identification Information. For more information on the components of this data element, see Section 5 of this Notice.

Required Response Categories:

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.13 Program Identification Information</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-digit FIPS code identifying geographic location of provider (see Part 5 of Notice for instructions on how to obtain FIPS code).</td>
<td></td>
</tr>
<tr>
<td>Identification code for facility where services provided (Locally Determined).</td>
<td></td>
</tr>
<tr>
<td>HUD-Assigned.</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: The FIPS code, facility code, CoC code, and program type code should be stored as separate fields in the database. This data element should be treated as a protected personal identifier and is subject to the security standards for personal identifiers set forth in Section 4 of this Notice.

2.14 Household Identification Number

Rationale: To count the number of households served.

Data Source: Interview or staff observation that a client is participating in a program with other members of a household.

When Data Are Collected: Upon any program entry (whether or not it is an initial program entry) or as soon as possible thereafter.

Subjects: All clients.

Required Response Categories:

**UNIVERSAL DATA ELEMENT**

<table>
<thead>
<tr>
<th>2.14 Household identification number</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Household ID number must be created, but there is no required format as long as the number allows identification of clients that receive services as a household.</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: A household is a group of persons who together apply for homeless assistance services. If it is not evident to program staff whether or not the others are applying for assistance with the client, then program staff should ask if anyone else is applying for assistance with the client.

Persons can join a household with members who have already begun a program or leave a program although other members of the household remain in the program. A common household identification number should be assigned to each member of the same
household. Individuals in a household (adults and/or children) who are not present when the household initially applies for assistance and later join the household should be assigned the same household identification number that links them to the rest of the persons in the household. For example, a child may be in school when the adult applies for assistance, but will be part of the household receiving assistance from the program right from the start. Or, a child may be in foster care at the time service is initiated, but may rejoin the household to receive services several weeks later. See Section 5 of this Notice for more information on this data element.

### EXHIBIT 1: SUMMARY OF UNIVERSAL DATA ELEMENTS

<table>
<thead>
<tr>
<th>Data standards</th>
<th>Subjects</th>
<th>Protected personal information</th>
<th>Data entry or computer generated</th>
<th>Collect at initial or every service event</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Name .................</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.2 Social Security Number ..........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.3 Date of Birth ........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.4 Ethnicity and Race ..........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.5 Gender .................</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.6 Veteran Status ..........</td>
<td>Adults ......</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.7 Disabling Condition ..........</td>
<td>Adults ......</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.8 Residence Prior to Program Entry ..........</td>
<td>Adults and Unac- companied Youth.</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.9 Zip Code of Last Permanent Address ..........</td>
<td>Adults and Unac- companied Youth.</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Initial Only.¹</td>
</tr>
<tr>
<td>2.10 Program Entry Date ..........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.11 Program Exit Date ..........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.12 Unique Personal Identification Number ..........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.13 Program Identification Number ..........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Every Time.</td>
</tr>
<tr>
<td>2.14 Household Identifier Number ........</td>
<td>All Clients</td>
<td>Protected .................</td>
<td>Data Entry .................</td>
<td>Every Time.</td>
</tr>
</tbody>
</table>

¹ Note that one or more of these personal identifiers may need to be asked on subsequent visits to find and retrieve the client's record. However, this information only needs to be recorded on the initial visit.

### EXHIBIT 2: RECOMMENDED QUESTIONS FOR UNIVERSAL DATA ELEMENTS

2.1 Name

Q: "What is your first, middle, and last name, and suffix?" (legal names only; avoid aliases or nicknames)

2.2 Social Security Number (SSN)

Q: "What is your Social Security Number?"

2.3 Date of Birth

Q: "What is your birth date?"

If complete birth date is not known:
Q: "What is your age?"

2.4 Ethnicity and Race

Q: "Are you Hispanic or Latino?"
Q: "What is your race (you may name more than one race)?"

2.5 Gender

Q: "Are you male or female?"

2.6 Veteran Status

Q: "Have you ever served on active duty in the Armed Forces of the United States?"

2.7 Disabling Condition

Q: "Do you have a physical, mental, emotional or developmental disability, HIV/AIDS, or a diagnosable substance abuse problem that is expected to be of long duration and substantially limits your ability to live on your own?"

2.8 Residence Prior to Program Entrance

Q: "Where did you stay last night?"
Q: "How long did you stay at that place?"

2.9 Zip Code of Last Permanent Residence

Q: "What is the zip code of the apartment, room, or house where you last lived for 90 days or more?"
**EXHIBIT 2: RECOMMENDED QUESTIONS FOR UNIVERSAL DATA ELEMENTS—Continued**

2.10 Program Entry Date

No question needed.

2.11 Program Exit Date

No question needed.

2.12 Personal Identification Number (PIN)

To facilitate the search for an existing PIN, may want to ask:
Q: “Have you ever been served by this [name of facility or program] before?”

2.13 Program Identification Number

No question needed.

2.14 Household Identification Number

If it is not evident that others are applying for or receiving assistance with the client, then may want to ask:
Q: “Is there someone else who is applying for (or receiving) assistance with you?” If yes,
Q: “What is their first, middle, and last name?” (legal names only; avoid aliases and nicknames)
Q: “Do you have any children under 18 years of age with you?” If yes,
Q: “What is (are) the first, middle, and last name(s) of the child(ren) with you?”

---

**EXHIBIT 3: REQUIRED RESPONSE CATEGORIES FOR UNIVERSAL DATA ELEMENTS**

<table>
<thead>
<tr>
<th>Response Categories</th>
<th>Response Categories</th>
</tr>
</thead>
</table>
| First Name ... | First Name ...
| Midle Name | Middle Name
| Last Name ... | Last Name ...
| Suffix | Suffix
| Jr. | Jr.

2.2 Social security number 

<table>
<thead>
<tr>
<th>Social security number</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSN data quality code ..</td>
<td>(example: 123 45 6789)</td>
</tr>
<tr>
<td>1 = Full SSN Reported</td>
<td></td>
</tr>
<tr>
<td>2 = Partial SSN Reported</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know or Don’t Have SSN</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

2.3 Date of birth .......... 

| (e.g., 08/31/1965) |
| (Month) (Day) (Year) |

2.4 Ethnicity and race 

| (Year) |
| (Suffix) |

2.5 Gender 

| 0 = Female |
| 1 = Male |

2.6 Veteran status 

| 0 = No |
| 1 = Yes |
| 8 = Don’t Know |
| 9 = Refused |

2.7 Disabling condition 

| 0 = No |
| 1 = Yes |
| 8 = Don’t Know |
| 9 = Refused |

2.8 Residence prior to program entry. 

<p>| Type of residence | 1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher) |</p>
<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Transitional housing for homeless persons (including homeless youth)</td>
</tr>
<tr>
<td>3</td>
<td>Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab)</td>
</tr>
<tr>
<td>4</td>
<td>Psychiatric hospital or other psychiatric facility</td>
</tr>
<tr>
<td>5</td>
<td>Substance abuse treatment facility or detox center</td>
</tr>
<tr>
<td>6</td>
<td>Hospital (non-psychiatric)</td>
</tr>
<tr>
<td>7</td>
<td>Jail, prison, or juvenile detention facility</td>
</tr>
<tr>
<td>10</td>
<td>Room, apartment, or house that you rent</td>
</tr>
<tr>
<td>11</td>
<td>Apartment or house that you own</td>
</tr>
<tr>
<td>12</td>
<td>Staying or living in a family member’s room, apartment, or house</td>
</tr>
<tr>
<td>13</td>
<td>Staying or living in a friend’s room, apartment, or house</td>
</tr>
<tr>
<td>14</td>
<td>Hotel or motel paid for without emergency shelter voucher</td>
</tr>
<tr>
<td>15</td>
<td>Foster care home or foster care group home</td>
</tr>
<tr>
<td>16</td>
<td>Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)</td>
</tr>
<tr>
<td>17</td>
<td>Other</td>
</tr>
<tr>
<td>8</td>
<td>Don’t Know</td>
</tr>
<tr>
<td>9</td>
<td>Refused</td>
</tr>
<tr>
<td>1</td>
<td>One week or less</td>
</tr>
<tr>
<td>2</td>
<td>More than one week, but less than one month</td>
</tr>
<tr>
<td>3</td>
<td>One to three months</td>
</tr>
<tr>
<td>4</td>
<td>More than three months, but less than one year</td>
</tr>
<tr>
<td>5</td>
<td>One year or longer</td>
</tr>
</tbody>
</table>

**Length of stay in previous place.**

**Zip code of last permanent residence.**

<table>
<thead>
<tr>
<th>Zip code</th>
<th>Zip data quality code</th>
<th>Response categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>..........</td>
<td>(e.g., 12345)</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Full Zip Code Recorded</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Refused</td>
<td></td>
</tr>
</tbody>
</table>

**Program entry date:**

<table>
<thead>
<tr>
<th>Date format</th>
<th>Example: 01/30/2004</th>
<th>Response categories</th>
</tr>
</thead>
</table>

**Program exit date:**

<table>
<thead>
<tr>
<th>Date format</th>
<th>Example: 01/31/2004</th>
<th>Response categories</th>
</tr>
</thead>
</table>

**Personal identification number.**

A PIN must be created, but there is no required format as long as there is a single unique PIN for every client served in the CoC and it contains no personally identifying information.

**Program identification information.**

10-digit FIPS code identifying geographic location of provider (see Part 5 of Notice for instructions on how to obtain FIPS code).

**Federal information processing standards (FIPS code).** Identification code for facility where services provided (Locally Determined).

**Facility code.**

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Emergency shelter (e.g., facility or vouchers)</td>
</tr>
<tr>
<td>2</td>
<td>Transitional housing</td>
</tr>
<tr>
<td>3</td>
<td>Permanent supportive housing</td>
</tr>
<tr>
<td>4</td>
<td>Street outreach</td>
</tr>
<tr>
<td>5</td>
<td>Homeless prevention (e.g., security deposit or one month’s rent)</td>
</tr>
<tr>
<td>6</td>
<td>Services only type of program</td>
</tr>
<tr>
<td>7</td>
<td>Other</td>
</tr>
</tbody>
</table>

**Program type code.**

A Household ID number must be created, but there is no required format; as long as the number allows identification of clients that receive services as a household.

### 3. Program-Specific Data Elements

Program-specific data elements must be collected from all clients served by programs that are required to report this information to HUD and other organizations. For programs with no such reporting requirements, these standards are optional but recommended since they allow local CoGs to obtain consistent information across a range of providers that can be used to plan service delivery, monitor the provision of services, and identify client outcomes. These data elements, however, do not constitute a client assessment tool, and providers will need to develop their own data collection protocols in order to properly assess a client's need for services. For programs that receive funding through HUD's Supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program, [program-specific data elements].
and the homeless programs funded through Housing Opportunities for Persons with AIDS (HOPWA), most program-specific data elements are required to complete Annual Progress Reports (APRs).

The program-specific data elements that are required for HUD’s current APR reporting include:

- 3.1: Income and Sources
- 3.2: Non-Cash Benefits
- 3.3: Physical Disability
- 3.4: Developmental Disability
- 3.5: HIV/AIDS
- 3.6: Mental Health
- 3.7: Substance Abuse
- 3.8: Domestic Violence
- 3.9: Services Received
- 3.10: Destination
- 3.11: Reasons for Leaving

In addition to these data elements that are required for APR reporting, additional program-specific data elements are recommended by a team of HMIS practitioners, federal agency representatives, and researchers. These data elements are based on best practices that are currently being implemented at the local level. In addition, HUD is working to bring together federal agencies that fund McKinney-Vento programs in an effort to standardize the data elements and definitions used by these agencies in their reporting requirements. This effort to standardize data definitions and standards across federal agencies will make reporting easier and more consistent for homeless providers who use multiple federal funding sources. Some of these data elements may be added to HUD APRs in the future. They include:

- 3.12: Employment
- 3.13: Education
- 3.14: General Health Status
- 3.15: Pregnancy Status
- 3.16: Veteran’s Information
- 3.17: Children’s Education

A summary of the program-specific data elements is provided at the end of this section (see Exhibit 4).

All of the program-specific data elements require that staff from a homeless assistance agency enter information into the HMIS database. This information may be:

- Provided by the client (in the course of client assessment and, for some data elements, at program exit);
- Taken from case manager interviews or records; and/or
- Observed by program staff.

Information should be collected separately from each adult and unaccompanied youth. In the case of a household or family that is receiving services together, information should be obtained and recorded for each adult and child in the household. However, for current APR reporting purposes, programs should continue to report only on participants defined by HUD as single persons and adults in families, excluding children or caregivers who live with the adults, who receive assistance during the operating year.

If the source of information is a client interview, staff are encouraged to use the questions that are provided in Exhibit 5 “Recommended Questions for Program-Specific Data Elements” at the end of this section. HUD requires that clients be notified as to why the information is being collected and the ways in which clients may benefit from providing the information. Programs that collect this information should be prepared to help the person, to the extent practicable, either by directly providing services or providing a referral, and programs should provide adequate data confidentiality protections, including adequate training of staff, to ensure that this information remains confidential. As discussed in Section 4 of this Notice, local CoCs must establish firm policies and procedures to protect against unauthorized disclosure of, or misuse of, personal information.

For each program-specific data element, multiple response categories are provided. For APR-required data elements, the response categories and associated codes are required and the HMIS application must include these responses and codes exactly as they are presented in this section. The response categories and corresponding codes for each data element are summarized at the end of this section (see Exhibit 6). Section 5 of this Notice discusses the technical standards for handling specific types of response categories and codes (e.g., missing values and “other” response categories) throughout the HMIS application.

Finally, many of these data elements represent transactions or information that may change over time. The CoC should decide which program-specific data elements to update in cases where clients already have records in the HMIS and return to the program following a previous service episode.

3.1 Income and Sources

**Rationale:** Income and sources of income are important for determining service needs of people at the time of program entry, determining whether they are accessing all income sources for which they are eligible, and describing the characteristics of the homeless population. Capturing the amount of cash income from various sources will help to assure all income sources are counted in the calculation of total income; enable program staff to take into account the composition of income in determining needs; determine if people are receiving the mainstream program benefits to which they may be entitled; help clients apply for benefits assistance; and allow analysis of changes in the composition of income between entry and exit from the program.

**Data Source:** Client interview, self-administered form, and/or case manager records.

**When Data Are Collected:** In the course of client assessment and at program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** In separate fields, determine (a) whether the client received income from each source listed below in the past 30 days, (b) the amount of income received from each source identified by the client, and (c) the client’s total monthly income (rounded to the nearest U.S. dollar). Allow clients to identify multiple sources of income.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>Source and amount of income</th>
<th>Source of income</th>
<th>Amount from source</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Earned Income</td>
<td></td>
<td>$00</td>
</tr>
<tr>
<td>2 = Unemployment Insurance</td>
<td></td>
<td>$00</td>
</tr>
<tr>
<td>3 = Supplemental Security Income or SSI</td>
<td></td>
<td>$00</td>
</tr>
<tr>
<td>4 = Social Security Disability Income (SSDI)</td>
<td></td>
<td>$00</td>
</tr>
</tbody>
</table>

**Program—Specific Data Element**
PROGRAM—SPECIFIC DATA ELEMENT—Continued

3.1 Income and source

<table>
<thead>
<tr>
<th>Source and amount of income</th>
<th>Source of income</th>
<th>Amount from source $</th>
</tr>
</thead>
<tbody>
<tr>
<td>5  =  A veteran’s disability payment</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>6  =  Private disability insurance</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>7  =  Worker’s compensation</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>8  =  Temporary Assistance for Needy Families (TANF) (or use local program name).</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>9  =  General Assistance (GA) (or use local program name)</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>10 =  Retirement income from Social Security</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>11 =  Veteran’s pension</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>12 =  Pension from a former job</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>13 =  Child support</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>14 =  Alimony or other spousal support</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>15 =  Other source</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
<tr>
<td>16 =  No financial resources</td>
<td></td>
<td><em>.</em>._.00</td>
</tr>
</tbody>
</table>

Total monthly income .............................................................................. $._._._.00

Special Issues: For APR reporting purposes, the total monthly income should include only the income for participants as defined by HUD and should not include income associated with children or caregivers who live with the adults assisted. The income associated with children or caregivers who live with the adults assisted should be recorded separately as part of their individual client record.

Programs may choose to disaggregate the sources of income into more detailed categories as long as these categories can be aggregated into the above-stated sources of income.

3.2 Non-Cash Benefits

Rationale: Non-cash benefits are important to determine whether people are accessing all mainstream program benefits for which they may be eligible and to ascertain a more complete picture of their situation.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment and at program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

Subjects: All adults and unaccompanied youth served by the program.

Definition and Instructions: For each source listed below, determine if the client received any of the non-cash benefits in the past month (30 days). Allow clients to identify multiple sources of non-cash benefits.

Required Response Categories:

3.2 Source of non-cash benefit

<table>
<thead>
<tr>
<th>Response category</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1 =  Food stamps or money for food on a benefits card</td>
<td></td>
</tr>
<tr>
<td>2 =  MEDICAID health insurance program (or use local name)</td>
<td></td>
</tr>
<tr>
<td>3 =  MEDICARE health insurance program (or use local name)</td>
<td></td>
</tr>
<tr>
<td>4 =  State Children’s Health Insurance Program (or use local name)</td>
<td></td>
</tr>
<tr>
<td>5 =  Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)</td>
<td></td>
</tr>
<tr>
<td>6 =  Veteran’s Administration (VA) Medical Services</td>
<td></td>
</tr>
<tr>
<td>7 =  TANF Child Care services (or use local name)</td>
<td></td>
</tr>
<tr>
<td>8 =  TANF transportation services (or use local name)</td>
<td></td>
</tr>
<tr>
<td>9 =  Other TANF-funded services (or use local name)</td>
<td></td>
</tr>
<tr>
<td>10 =  Section 8, public housing, or other rental assistance</td>
<td></td>
</tr>
<tr>
<td>11 =  Other source</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: Programs may choose to disaggregate the non-cash sources of income into more detailed categories as long as these categories can be aggregated into the above-stated non-cash sources of income. Programs may also choose to record additional information about non-cash sources of income, including: information related to benefit eligibility (e.g., if a person is not receiving a service, is it because they are not eligible or eligibility has not yet been determined); amount of benefits; and start and stop dates for receipt of benefits.

3.3 Physical Disability

Rationale: To count the number of physically disabled persons served by homeless programs, determine eligibility for disability benefits, and assess their need for services.

Data Source: Client interview, self-administered form, and/or case manager records.

When Data Are Collected: In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

Subjects: All clients served.

Definition and Instructions: Determine if the client has a physical disability, meaning a physical impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes an individual’s ability to live independently, and (c) of such a nature
that such ability could be improved by more suitable housing conditions.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.3 Physical disability</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0=No 1=Yes</td>
</tr>
</tbody>
</table>

**3.4 Developmental Disability**

**Rationale:** To count the number of developmentally disabled persons served by homeless programs, determine eligibility for disability benefits, and assess their need for services.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data Are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** Determine if the client has a developmental disability, meaning a severe, chronic disability that is attributed to a mental or physical impairment (or combination of physical and mental impairments) that occurs before 22 years of age and limits the capacity for independent living and economic self-sufficiency.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.4 Developmental disability</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0=No 1=Yes</td>
</tr>
</tbody>
</table>

**3.5 HIV/AIDS**

**Rationale:** To identify persons who have been diagnosed with AIDS or have tested positive for HIV and assess their need for services.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data Are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

**Subjects:** All adults and unaccompanied youth served.

**Definition and Instructions:** Determine if the client has been diagnosed with AIDS or has tested positive for HIV. If the client does not provide the information and it is not contained in case manager records, leave the response field blank.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.5 HIV/AIDS</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0=No 1=Yes</td>
</tr>
</tbody>
</table>

**Special Issues:** This information is required for determining eligibility for the HOPWA program. Such information is covered by confidentiality requirements. As in other areas involving sensitive or protected client information, information should be recorded only when a program or project has adequate data confidentiality protections. These protections include agency policies and procedures and staff training to ensure that HIV-related information cannot be learned by anyone without the proper authorization.

**3.6 Mental Health**

**Rationale:** To count the number of persons served with mental health problems, and to assess the need for treatment.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data Are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

**Subjects:** All adults and unaccompanied youth served.

**Definition and Instructions:** In separate data fields, determine (a) if the client has a mental health problem; and (b) whether it is expected to be of long-continued and indefinite duration and substantially impairs a client's ability to live independently. A mental health problem may include serious depression, serious anxiety, hallucinations, violent behavior or thoughts of suicide.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.6 Mental Health</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental health problem</td>
<td>0=No 1=Yes</td>
</tr>
<tr>
<td>Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently</td>
<td>0=No 1=Yes</td>
</tr>
</tbody>
</table>

**3.7 Substance Abuse**

**Rationale:** To count the number of persons served with substance abuse problems, and to assess the need for treatment.

**Data Source:** Client interview, self-administered form and/or case manager records.

**When Data Are Collected:** In the course of client assessment once the individual is admitted, unless this information is needed prior to admission to determine program eligibility. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

**Subjects:** All adults and unaccompanied youth served.

**Definition and Instructions:** In separate data fields, determine (a) if the client has an alcohol or drug abuse problem, or is dully diagnosed and (b) whether it is expected to be of long-continued and indefinite duration and substantially impairs a client's ability to live independently.

**Required Response Categories:**

**PROGRAM-SPECIFIC DATA ELEMENT**

<table>
<thead>
<tr>
<th>3.7 Substance abuse</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substance abuse problem</td>
<td>1 = Alcohol abuse 2 = Drug abuse 3 = Dully diagnosed</td>
</tr>
<tr>
<td>Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently</td>
<td>0=No 1=Yes</td>
</tr>
</tbody>
</table>

**3.8 Domestic Violence**

**Rationale:** Ascertaining whether a person is a victim of domestic violence is necessary to provide the person with the appropriate services to prevent further abuse and to treat the physical and psychological injuries from prior abuse. Also, ascertaining that a person may be experiencing domestic violence may be important for the safety of program staff and other clients. At the aggregate level, knowing the size of the homeless population that has
experienced domestic violence is critical for determining the resources needed to address the problem in this population.

Data Source: Client interview, self-administered form and/or case manager records.

When Data are Collected: In the course of client assessment. Needed to complete APRs for certain HUD McKinney-Vento Act programs.

Subjects: All adults and unaccompanied youth.

Definition and Instructions: In separate fields, determine (a) if the client has ever been a victim of domestic violence and (b), if so, how long ago did the client have the most recent experience.

Required Response Categories:

PROGRAM-SPECIFIC DATA ELEMENT

3.8 Domestic violence

<table>
<thead>
<tr>
<th>Response category</th>
<th>0 = No</th>
<th>1 = Yes</th>
<th>2 = Within the past three months</th>
<th>3 = From six to twelve months ago</th>
<th>4 = More than a year ago</th>
<th>8 = Don’t know</th>
<th>9 = Refused</th>
</tr>
</thead>
</table>

3.9 Services Received

Rationale: To determine the services provided during a program stay and any resulting outcomes. Some funders may want information on service receipt as a performance measure. Service receipt may also be useful in identifying service gaps in a community.

Data Source: Case manager records.

When Data are Collected: In the course of client assessment and at appropriate points during the program stay. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

Subjects: All clients served.

Definition and Instructions: For each service encounter, two types of information must be determined and recorded in two separate fields. Record “date of service” as the two-digit month, two-digit day and four-digit year. Record “type of service” as one of the service types listed below.

Required Response Categories: Note that the services listed here cover all of the types of services that a homeless person receives. Not all of these services are eligible uses of HUD program funds.

PROGRAM-SPECIFIC DATA ELEMENT

<table>
<thead>
<tr>
<th>3.9 Services received</th>
<th>Response category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of service ........</td>
<td>/ /</td>
<td>/ (08/31/1965)</td>
</tr>
<tr>
<td>Service type .............</td>
<td>1 = Food ..........</td>
<td>Emergency food programs and food pantries.</td>
</tr>
<tr>
<td>1 = Food ..........</td>
<td>2 = Housing placement</td>
<td>Housing search.</td>
</tr>
<tr>
<td>2 = Housing placement</td>
<td>3 = Material goods</td>
<td>Clothing and personal hygiene items.</td>
</tr>
<tr>
<td>3 = Material goods</td>
<td>4 = Temporary housing and other financial aid.</td>
<td>Rent payment or deposit assistance</td>
</tr>
<tr>
<td>4 = Temporary housing and other financial aid.</td>
<td>5 = Transportation</td>
<td>Bus passes and mass transit tokens</td>
</tr>
<tr>
<td>5 = Transportation</td>
<td>6 = Consumer assistance and protection</td>
<td>Money management counseling and acquiring identification/SSN</td>
</tr>
<tr>
<td>6 = Consumer assistance and protection</td>
<td>7 = Criminal justice/legal services</td>
<td>Legal counseling and immigration services</td>
</tr>
<tr>
<td>7 = Criminal justice/legal services</td>
<td>8 = Education</td>
<td>GED instruction, bilingual education, and literacy programs</td>
</tr>
<tr>
<td>8 = Education</td>
<td>9 = Health care</td>
<td>Disability screening, health care referrals, and health education (excluding HIV/AIDS-related services, mental health care/counseling, and substance abuse services).</td>
</tr>
<tr>
<td>9 = Health care</td>
<td>10 = HIV/AIDS-related services</td>
<td>HIV testing, AIDS treatment, AIDS/HIV prevention and counseling</td>
</tr>
<tr>
<td>10 = HIV/AIDS-related services</td>
<td>11 = Mental health care/counseling</td>
<td>Telephone crisis hotlines and psychiatric programs</td>
</tr>
<tr>
<td>11 = Mental health care/counseling</td>
<td>12 = Substance abuse services</td>
<td>Detoxification and alcohol/drug abuse counseling</td>
</tr>
<tr>
<td>12 = Substance abuse services</td>
<td>13 = Employment</td>
<td>Job development and job finding assistance</td>
</tr>
<tr>
<td>13 = Employment</td>
<td>14 = Case/care management</td>
<td>Development of plans for the evaluation, treatment and/or care of persons needing assistance in planning or arranging for services</td>
</tr>
<tr>
<td>14 = Case/care management</td>
<td>15 = Day care</td>
<td>Child care centers and infant care centers</td>
</tr>
<tr>
<td>15 = Day care</td>
<td>16 = Personal enrichment</td>
<td>Life skills education, social skills training, and stress management</td>
</tr>
<tr>
<td>16 = Personal enrichment</td>
<td>17 = Outreach</td>
<td>Street outreach</td>
</tr>
<tr>
<td>17 = Outreach</td>
<td>18 = Other</td>
<td></td>
</tr>
</tbody>
</table>

Special Issues: With few exceptions, the response categories for the type of services provided and the associated examples are based on A Taxonomy of Human Services: A Conceptual Framework with Standardized Terminology and Definitions for the Field, 1994 (published by the Alliance of Information and Referral Systems (AIRS) and INFO LINE of Los Angeles). The “HIV/AIDS-related services” category is not included in the taxonomy under a single heading; instead there are multiple types of HIV/AIDS services found at various service typology levels. The examples associated with this response category are specific types of services identified in the taxonomy. The “housing placement,” “outreach” and “other” response categories are not derived from the taxonomy.

The taxonomy is a classification system for human services that has been adopted by information and referral programs, libraries, crisis lines and other programs throughout the United States. It features a five-level hierarchical structure that contains 4,300 terms that are organized into 10 basic service categories. The taxonomy provides a common language for human services, ensuring that people have common terminology for naming services, agreements regarding definitions for what a service involves and a common way of organizing service concepts.

Programs are encouraged to review the Taxonomy of Human Services as a model for a complete list of examples, standardizing terminology and definitions of homeless services.

Programs may choose to disaggregate the types of services into more detailed
For APR reporting purposes, programs should use the following coding approach to conform to the response
categories in the current APR:

### CROSS-WALK OF HMIS AND APH RESPONSE CATEGORIES FOR SERVICES RECEIVED

<table>
<thead>
<tr>
<th>Response categories in the final notice</th>
<th>Corresponding response categories in the current APR</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Food</td>
<td>n = Other</td>
</tr>
<tr>
<td>2 = Housing/shelter</td>
<td>i = Housing placement</td>
</tr>
<tr>
<td>3 = Material goods</td>
<td>n = Other</td>
</tr>
<tr>
<td>4 = Temporary housing and other financial aid</td>
<td>n = Other</td>
</tr>
<tr>
<td>5 = Transportation</td>
<td>l = Transportation</td>
</tr>
<tr>
<td>6 = Consumer assistance and protection</td>
<td>c = Life skills</td>
</tr>
<tr>
<td>7 = Criminal justice/legal services</td>
<td>m = Legal</td>
</tr>
<tr>
<td>8 = Education</td>
<td>h = Education</td>
</tr>
<tr>
<td>9 = Health care</td>
<td>g = Other health care services</td>
</tr>
<tr>
<td>10 = HIV/AIDS-related services</td>
<td>f = HIV/AIDS-related services</td>
</tr>
<tr>
<td>11 = Mental health care/counseling</td>
<td>e = Mental health services</td>
</tr>
<tr>
<td>12 = Substance abuse services</td>
<td>d = Alcohol or drug abuse services</td>
</tr>
<tr>
<td>13 = Employment</td>
<td>j = Employment assistance</td>
</tr>
<tr>
<td>14 = Case/care management</td>
<td>b = Case management</td>
</tr>
<tr>
<td>15 = Day care</td>
<td>k = Child care</td>
</tr>
<tr>
<td>16 = Personal enrichment</td>
<td>c = Life skills (outside of case management)</td>
</tr>
<tr>
<td>17 = Outreach</td>
<td>a = Outreach</td>
</tr>
<tr>
<td>18 = Other</td>
<td>n = Other</td>
</tr>
</tbody>
</table>

#### 3.10 Destination

**Rationale:** Destination is an important outcome measure.

**Data Source:** Client interview or self-administered form.

**When Data Are Collected:** At program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** Determine and record in three separate data fields: (1) Where the client will be staying after they leave the program; (2) if this move is permanent or transitional; and (3) does the move involve a HUD subsidy or other subsidy.

**Required Response Categories:**

#### PROGRAM-SPECIFIC DATA ELEMENT

<table>
<thead>
<tr>
<th>3.10 Destination</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Destination</td>
<td></td>
</tr>
<tr>
<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher)*</td>
<td></td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons (including homeless youth)*</td>
<td></td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons (such as S+P, S+C, or SRO Mod Rehab)</td>
<td></td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility</td>
<td></td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center</td>
<td></td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric)</td>
<td></td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility</td>
<td></td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent</td>
<td></td>
</tr>
<tr>
<td>11 = Apartment or house that you own</td>
<td></td>
</tr>
<tr>
<td>12 = Staying or living in a family member’s room, apartment, or house</td>
<td></td>
</tr>
<tr>
<td>13 = Staying or living in a friend’s room, apartment, or house</td>
<td></td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher</td>
<td></td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home</td>
<td></td>
</tr>
<tr>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)</td>
<td></td>
</tr>
<tr>
<td>17 = Other</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tenure</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Permanent</td>
<td></td>
</tr>
<tr>
<td>2 = Transitional</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Subsidy Type</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = None</td>
<td></td>
</tr>
<tr>
<td>1 = Public housing</td>
<td></td>
</tr>
<tr>
<td>2 = Section 8</td>
<td></td>
</tr>
<tr>
<td>3 = S+C</td>
<td></td>
</tr>
<tr>
<td>4 = HOME program</td>
<td></td>
</tr>
<tr>
<td>5 = HOPWA program</td>
<td></td>
</tr>
<tr>
<td>6 = Other housing subsidy</td>
<td></td>
</tr>
<tr>
<td>8 = Don’t Know</td>
<td></td>
</tr>
<tr>
<td>9 = Refused</td>
<td></td>
</tr>
</tbody>
</table>
Special Issues: For response categories marked with an asterisk (*), these destinations are currently not eligible for HOPWA funding. Also, programs may choose to ask additional questions such as whether upon leaving the program the client will be reuniting with other family members who have not been with them during the program stay. For APR reporting purposes, programs should use the following coding:

<table>
<thead>
<tr>
<th>Response categories in the final notice</th>
<th>Corresponding response categories in the APR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Destination = 1</td>
<td>n = Emergency shelter.</td>
</tr>
<tr>
<td>Destination = 2</td>
<td>i = Transitional housing for homeless persons.</td>
</tr>
<tr>
<td>Destination = 3</td>
<td>d = Shelter Plus Care (S+C).</td>
</tr>
<tr>
<td>Destination = 3</td>
<td>o = Other supportive housing.</td>
</tr>
<tr>
<td>Subsidy Type = not equal to 3.</td>
<td>k = Institution psychiatric hospital.</td>
</tr>
<tr>
<td>Destination = 4</td>
<td>l = Institution inpatient alcohol or other drug treatment facility.</td>
</tr>
<tr>
<td>Destination = 5</td>
<td>q = Other.</td>
</tr>
<tr>
<td>Destination = 6</td>
<td>m = Institution jail/prison.</td>
</tr>
<tr>
<td>Destination = 7, 8, 9, 10, or 16</td>
<td>b = Public housing.</td>
</tr>
<tr>
<td>Subsidy Type = 1</td>
<td>c = Section 8.</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>d = Shelter Plus Care (S+C).</td>
</tr>
<tr>
<td>Subsidy Type = 2</td>
<td>e = HOME subsidized house or apartment.</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>f = Permanent other subsidized house or apartment.</td>
</tr>
<tr>
<td>Subsidy Type = 3</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>r = Unknown.</td>
</tr>
<tr>
<td>Tenure = 1</td>
<td>a = Rental House or Apt (no subsidy).</td>
</tr>
<tr>
<td>Destination = 8, 9, 10, or 16</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Subsidy Type = 4</td>
<td>g = Homeownership.</td>
</tr>
<tr>
<td>Destination = 8 or 9</td>
<td>h = Permanent: moved in with family or friends.</td>
</tr>
<tr>
<td>Subsidy Type = 6, 8 or 9</td>
<td>j = Transitional: moved in with family or friends.</td>
</tr>
<tr>
<td>Destination = 10</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Subsidy Type = 6, 8, or 9</td>
<td>q = Other (Please specify).</td>
</tr>
<tr>
<td>Destination = 12</td>
<td>p = Other places not meant for human habitation (e.g., street).</td>
</tr>
<tr>
<td>Subsidy Type = 6, 8, 9</td>
<td></td>
</tr>
<tr>
<td>Destination = 12</td>
<td></td>
</tr>
<tr>
<td>Tenure = 1</td>
<td></td>
</tr>
<tr>
<td>Destination = 12</td>
<td></td>
</tr>
<tr>
<td>Tenure = 2</td>
<td></td>
</tr>
<tr>
<td>Destination = 13</td>
<td></td>
</tr>
<tr>
<td>Destination = 14</td>
<td></td>
</tr>
<tr>
<td>Destination = 15</td>
<td></td>
</tr>
</tbody>
</table>

### 3.11 Reasons for Leaving

**Rationale:** Reasons for leaving are used, in part, to identify the barriers and issues clients face in completing a program or staying in a residential facility, which may affect their ability to achieve economic self-sufficiency.

**Data Source:** Recorded by program staff.

**When Data Are Collected:** At program exit. Needed to complete Annual Progress Reports for certain HUD McKinney-Vento Act programs.

**Subjects:** All clients served.

**Definition and Instructions:** Identify the reason why the client left the program. If a client left for multiple reasons, record only the primary reason.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.11 Reason for leaving</td>
</tr>
<tr>
<td>Response category</td>
</tr>
<tr>
<td>1 = Left for a housing opportune before completing program</td>
</tr>
<tr>
<td>2 = Completed program</td>
</tr>
<tr>
<td>3 = Non-payment of rent/occupancy charge</td>
</tr>
<tr>
<td>4 = Non-compliance with project</td>
</tr>
<tr>
<td>5 = Criminal activity/destruction of property/violence</td>
</tr>
<tr>
<td>6 = Reached maximum time allowed by project</td>
</tr>
<tr>
<td>7 = Needs could not be met by project</td>
</tr>
<tr>
<td>8 = Disagreement with rules/ persons</td>
</tr>
<tr>
<td>9 = Death</td>
</tr>
<tr>
<td>10 = Unknown/disappeared</td>
</tr>
</tbody>
</table>

### 3.12 Employment

**Rationale:** To assess the program participant’s employment status and need for employment services. This can serve as an important outcome measure.

**Data Source:** Client interview or self-administered form.

**When Data Are Collected:** In the course of client assessment and at program exit.

**Subjects:** All adults and unaccompanied youth served.
**Definition and Instructions:** In separate fields, determine: (1) If the client is currently employed; (2) if currently employed, how many hours did the client work in the last week; (3) if currently employed, is the work permanent, temporary, or seasonal; and (4) if the client is not currently working, if they are currently looking for work. Seasonal employment is work that can, by the nature of it, ordinarily only be performed during a certain season in the year. Temporary employment is work for a limited time only or for a specific piece of work and that work will last a short duration. Permanent employment is work that is contemplated to continue indefinitely.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
<th>3.12 Employment</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employed</td>
<td>0 = No</td>
<td>1 = Yes</td>
</tr>
</tbody>
</table>

**Special Issues:** Programs may choose to ask additional information about a person’s employment status, for example any benefits (health insurance) received through employment or more detailed information on the type of employment.

### 3.13 Education

**Rationale:** To assess the program participant’s readiness for employment

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
<th>3.13 Education</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Currently in school or working on any degree or certificate</td>
<td>0 = No</td>
<td>1 = Yes</td>
</tr>
<tr>
<td>Received vocational training or apprenticeship certificates</td>
<td>0 = No</td>
<td>1 = Yes</td>
</tr>
<tr>
<td>Highest level of school completed</td>
<td>0 = No schooling completed</td>
<td>1 = Nursery school to 4th grade</td>
</tr>
<tr>
<td></td>
<td>2 = 5th grade or 6th grade</td>
<td>3 = 7th grade or 8th grade</td>
</tr>
<tr>
<td></td>
<td>4 = 9th grade</td>
<td>5 = 10th grade</td>
</tr>
<tr>
<td></td>
<td>6 = 11th grade</td>
<td>7 = 12th grade, No diploma</td>
</tr>
<tr>
<td></td>
<td>8 = High school diploma</td>
<td>9 = GED</td>
</tr>
<tr>
<td></td>
<td>10 = Post-secondary school</td>
<td>1 = None</td>
</tr>
<tr>
<td></td>
<td>2 = Associates Degree</td>
<td>1 = None</td>
</tr>
<tr>
<td></td>
<td>3 = Masters</td>
<td>2 = Associates Degree</td>
</tr>
<tr>
<td></td>
<td>4 = Doctorate</td>
<td>3 = Masters</td>
</tr>
<tr>
<td></td>
<td>5 = Other graduate/professional degree</td>
<td>4 = Doctorate</td>
</tr>
</tbody>
</table>

**When data are collected:** In the course of client assessment and at program exit.

**Subjects:** All clients served.

**Definition and Instructions:** Determine how the client assesses their health in comparison to other people their age.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
<th>3.14 General health</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Excellent</td>
<td>2 = Very good</td>
<td>3 = Good</td>
</tr>
</tbody>
</table>

**PRGRAM-SPECIFIC DATA ELEMENT—Continued**

### 3.15 Pregnancy Status

**Rationale:** To determine eligibility for benefits and need for services, and to determine the number of women
entering programs for homeless persons while pregnant.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** In the course of client assessment.

**Subjects:** All females of child-bearing age served.

**Definition and Instructions:** In separate fields, determine (a) if a client is pregnant and (b), if so, what is the due date. The due date is one field that consists of the two-digit month, two-digit day and four-digit year. If the day is unknown, programs are encouraged to record "01" as a default value. Communities that already have a policy of entering another approximate day may continue this policy. If the month is unknown, programs should leave the data field blank.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3.15 Pregnancy status</strong></td>
</tr>
<tr>
<td>Pregnancy status</td>
</tr>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Yes</td>
</tr>
<tr>
<td>Due date</td>
</tr>
<tr>
<td>/ / /</td>
</tr>
<tr>
<td>(Month) (Day) (Year)</td>
</tr>
</tbody>
</table>

**3.16 Veteran’s Information**

**Rationale:** To collect a more detailed profile of the homeless veteran’s experience and to determine eligibility for Department of Veterans Affairs (VA) programs and benefits. These questions were developed in consultation with the VA and reflect HUD’s continuing effort to standardize data definitions and standards across federal agencies.

**Data Source:** Client interview or self-administered form.

**When Data are Collected:** In the course of client assessment.

**Subjects:** All persons who answered “Yes” to Veterans Status data element.

**Definition and Instructions:** In separate fields, determine: (1) Which military service era did the client serve; (2) how many months did the client serve on active duty in the military; (3) if the client served in a war zone; (4) if the client served in a war zone, the name of the war zone; (5) if the client served in a war zone, the number of months served in the war zone; (6) if the client served in a war zone, whether the client received hostile or friendly fire; (7) what branch of the military did the client serve in; and (8) what type of discharge did the client receive. In identifying the military service era served by the client, programs are encouraged to begin with the most recent service era and proceed in descending order through the various eras. Allow clients to identify multiple service eras and branches of the military.

**Required Response Categories:**

<table>
<thead>
<tr>
<th>PROGRAM-SPECIFIC DATA ELEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3.16 Veteran’s information</strong></td>
</tr>
<tr>
<td>Military service eras</td>
</tr>
<tr>
<td>1 = Persian Gulf Era (August 1991–Present)</td>
</tr>
<tr>
<td>2 = Post Vietnam (May 1975–July 1991)</td>
</tr>
<tr>
<td>3 = Vietnam Era (August 1964–April 1975)</td>
</tr>
<tr>
<td>4 = Between Korean and Vietnam War (February 1955–July 1964)</td>
</tr>
<tr>
<td>5 = Korean War (June 1950–January 1955)</td>
</tr>
<tr>
<td>6 = Between WWII and Korean War (August 1947–May 1950)</td>
</tr>
<tr>
<td>7 = World War II (September ’40–July 1947)</td>
</tr>
<tr>
<td>8 = Between WWII and WWII (December 1918–August 1940)</td>
</tr>
<tr>
<td>9 = World War I (April 1917–November 1918)</td>
</tr>
<tr>
<td>Served in a war zone</td>
</tr>
<tr>
<td>If yes, name of war zone</td>
</tr>
<tr>
<td>If yes, number of months in war zone</td>
</tr>
<tr>
<td>If yes, received hostile or friendly fire</td>
</tr>
<tr>
<td>Branch of the military</td>
</tr>
<tr>
<td>Response category</td>
</tr>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Yes</td>
</tr>
<tr>
<td>1 = Army</td>
</tr>
<tr>
<td>2 = Air Force</td>
</tr>
<tr>
<td>3 = Navy</td>
</tr>
<tr>
<td>4 = Marines</td>
</tr>
<tr>
<td>5 = Other</td>
</tr>
</tbody>
</table>
3.16 Veteran’s information

<table>
<thead>
<tr>
<th>Discharge status</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Honorable</td>
<td></td>
</tr>
<tr>
<td>2 = General</td>
<td></td>
</tr>
<tr>
<td>3 = Medical</td>
<td></td>
</tr>
<tr>
<td>4 = Bad conduct</td>
<td></td>
</tr>
<tr>
<td>5 = Dishonorable</td>
<td></td>
</tr>
<tr>
<td>6 = Other</td>
<td></td>
</tr>
</tbody>
</table>

3.17 Children’s Education

Rationale: To determine if homeless children and youth have the same access to free, public education, including public preschool education, that is provided to other children and youth. It can also serve as an important outcome measure. These questions were developed in consultation with the U.S. Department of Education.

Data Source: Client interview or observations of program staff.

When Data Are Collected: In the course of client assessment. The data element is strongly recommended and may be added to HUD’s APR in the future.

Subjects: All children between 5 and 17 years of age.

Definition and Instructions: For each child, determine in separate fields: (1) If the child is currently enrolled in school; (2) if the child is currently enrolled, the name of the school; (3) if the child is currently enrolled, the type school; (4) if the child is not currently enrolled in school, what date was the child last enrolled in school; and (5) what problems has the head of household had in getting the child enrolled into school.

The last date of enrollment consists of the two-digit month and four-digit year. If the month is unknown, programs are encouraged to record “01” as a default value. Communities that already have a policy of entering another approximate month may continue this policy. If the year is unknown, programs should leave the data field blank. When identifying the problems the head of household encountered when enrolling the child in school, allow clients to identify multiple reasons for not enrolling the child in school.

Required Response Categories:

<table>
<thead>
<tr>
<th>Current enrollment status</th>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No</td>
<td></td>
</tr>
<tr>
<td>1 = Yes</td>
<td></td>
</tr>
</tbody>
</table>

If yes, name of child’s school

(Example: Lone Pine Elementary School)

1 = Public school
2 = Parochial or other private school

If not enrolled, last date of enrollment

(Month) (Year)

1 = None
2 = Residency requirements
3 = Availability of school records
4 = Birth certificates
5 = Legal guardianship requirements
6 = Transportation
7 = Lack of available preschool programs
8 = Immunization requirements
9 = Physical examination records
10 = Other

Special Issues: Programs may choose to obtain additional information related to children’s education, such as the number of school days missed over a specific period of time, the barriers to school attendance and the name and type of the school.

EXHIBIT 4: SUMMARY OF PROGRAM-SPECIFIC DATA ELEMENTS

<table>
<thead>
<tr>
<th>Data standards</th>
<th>Subjects</th>
<th>Required for APR?</th>
<th>Data entry or computer-generated</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Income and Sources</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.2 Non-Cash Benefits</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.3 Physical Disability</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.4 Developmental disability</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.5 HIV/AIDS</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.6 Mental health</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.7 Substance Abuse</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.8 Domestic Violence</td>
<td>Adults and Unaccompanied Youth</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.9 Services Received</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.10 Destination</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.11 Reasons for Leaving</td>
<td>All Clients</td>
<td>Yes</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.12 Employment</td>
<td>Adults and Unaccompanied Youth</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
</tbody>
</table>
EXHIBIT 4: SUMMARY OF PROGRAM-SPECIFIC DATA ELEMENTS—Continued

<table>
<thead>
<tr>
<th>Data standards</th>
<th>Subjects</th>
<th>Required for APR?</th>
<th>Data entry or computer-generated</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13 Education</td>
<td>Adults and Unaccompanied Youth</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.14 General Health Status</td>
<td>All Clients</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.15 Pregnancy Status</td>
<td>All Females of Child-bearing Age</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td>3.16 Veterans Information</td>
<td>All Persons who Answered &quot;Yes&quot;</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
<tr>
<td></td>
<td>to Veterans Status data element.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.17 Children’s Education</td>
<td>Children 5–17 Years of Age</td>
<td>No</td>
<td>Data Entry.</td>
</tr>
</tbody>
</table>

EXHIBIT 5: RECOMMENDED QUESTIONS FOR PROGRAM-SPECIFIC DATA ELEMENTS

Income and Sources
Q: “I am going to read a list of income sources and I would like for you to tell me if you [and/or the children who are coming into this program with you] have received money from any of these sources in the last month and the amount from each?” (Read each source.)
Q: “Over the last month, what was your total income? Please do not include the income of any persons in your household who are 18 years of age or older.”

Non-Cash Benefits
Q: “Have you [and/or the children who are coming into this program with you] received food stamps or money for food on a benefits card in the past month?”
Q: “Do you participate in the [insert response category] program?” (or replace with local name)

Physical Disability
Q: “Do you consider yourself to have a physical disability? By physical disability, I mean that you have a physical problem that is not temporary and that limits your ability to get around or work, or your ability to live on your own.”

Developmental disability
Q: “Have you ever received benefits or services (such as an income supplement or special education classes) for a developmental disability?”

HIV/AIDS
Q: “Have you been diagnosed with AIDS or have you tested positive for HIV?”

Mental health
Q: “Do you feel that you have a mental health problem such as serious depression, serious anxiety, hallucinations, violent behavior, thoughts of suicide?”
If yes, ask the following question:
Q: “Do you feel that this mental health problem will last for a long time and limits your ability to live on your own?”

Substance Abuse
Q: “Do you feel that you have a problem with alcohol?”
Q: “Do you feel that you have a problem with drugs?”
If yes to either or both questions, ask the following question:
Q: “Do you feel that this substance abuse problem will last for a long time and limits your ability to live on your own?”

Domestic Violence
Q: “Have you experienced domestic or intimate partner violence?”
If yes, ask the following question:
Q: “How long ago did you have this experience?”

Services Received
No question needed.

Destination
Q: “After you leave this program, where will you be living?”
Q: “Is this move permanent (more than 90 days) or temporary?”
Q: “Does the move involve a HUD subsidy or other subsidy?”

Reasons for Leaving
Q: “What is the main reason for leaving this program?”

Employment
Q: “Are you currently employed?”
If yes, ask the following questions:
Q: “How many hours did you work last week?”
Q: “Was this permanent, temporary, or seasonal work?”
If client reports that he/she is not working, ask the following question:
Q: “Are you currently looking for work?”

Education
Q: “Are you in school now, or working on any degree or certificate?”
Q: “Have you received any vocational training or apprenticeship certificates?”
Q: “What is the highest level of school that you have completed?”
If client has received a high school diploma or GED, ask the following questions:
Q: “Have you received any of the following degrees?” (Ask about each degree until the client answers “no.”)

General Health Status
Q: “Compared to other people your age, would you say your health is excellent, very good, good, fair, or poor?”

Pregnancy Status
Q: “Are you pregnant?”
If yes, then ask the following question:
Q: “What is your due date?”

Veterans Information
Q: “In which military service eras did you serve (choose all that apply)?”
Q: “How many months did you serve on active duty in the military?”
### Exhibit 5: Recommended Questions for Program-Specific Data Elements—Continued

Q: "Did you serve in a war zone?"
Q: "What war zone(s) (choose all that apply)?"
Q: "Was the number of marines served in a war zone?"
Q: "Did you ever receive hostile or friendly fire in a war zone?"
Q: "What branch of the military did you serve in?"
Q: "What type of discharge did you receive?"

Children's Education
Q: "Is [name of child] currently enrolled in school?"
If child is currently enrolled, ask:
Q: "What is the name of the child’s school(s)?"
Q: "What type of school is it? Is it a public or private school?"
If child is currently not enrolled in school, ask:
Q: "When was [name of child] last enrolled in school?"
Q: "I'm going to read a list of problems that you may have had getting your child into a school. Please tell me if you have experienced any of these problems for [name of child]." (Ask each.)

### Exhibit 6: Required Response Categories for Program-Specific Data Elements

<table>
<thead>
<tr>
<th>Source of income</th>
<th>Amount from source</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Earned Income</td>
<td>$___.00</td>
</tr>
<tr>
<td>2 = Unemployment Insurance</td>
<td>_____.00</td>
</tr>
<tr>
<td>3 = Supplemental Security Income or SSI</td>
<td>______.00</td>
</tr>
<tr>
<td>4 = Social Security Disability Income (SSDI)</td>
<td>_____.00</td>
</tr>
<tr>
<td>5 = Veterans' disability payment</td>
<td>_____.00</td>
</tr>
<tr>
<td>6 = Private disability insurance</td>
<td>_____.00</td>
</tr>
<tr>
<td>7 = Worker's compensation</td>
<td>______.00</td>
</tr>
<tr>
<td>8 = Temporary Assistance for Needy Families (TANF) (or use local program name)</td>
<td>______.00</td>
</tr>
<tr>
<td>9 = General Assistance (GA) (or use local program name)</td>
<td>______.00</td>
</tr>
<tr>
<td>10 = Retirement income from Social Security</td>
<td>______.00</td>
</tr>
<tr>
<td>11 = Veteran's pension</td>
<td>______.00</td>
</tr>
<tr>
<td>12 = Pension from a former job</td>
<td>______.00</td>
</tr>
<tr>
<td>13 = Child support</td>
<td>______.00</td>
</tr>
<tr>
<td>14 = Alimony or other spousal support</td>
<td>______.00</td>
</tr>
<tr>
<td>15 = Other source</td>
<td>______.00</td>
</tr>
<tr>
<td>16 = No financial resources</td>
<td>______.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Food stamps or money for food on a benefits card.</td>
</tr>
<tr>
<td>2 = MEDICAID health insurance program (or use local name).</td>
</tr>
<tr>
<td>3 = MEDICARE health insurance program (or use local name).</td>
</tr>
<tr>
<td>4 = State Children’s Health Insurance Program (or use local name).</td>
</tr>
<tr>
<td>5 = Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).</td>
</tr>
<tr>
<td>6 = Veteran’s Administration (VA) Medical Services.</td>
</tr>
<tr>
<td>7 = TANF Child Care services (or use local name).</td>
</tr>
<tr>
<td>8 = TANF transportation services (or use local name).</td>
</tr>
<tr>
<td>9 = Other TANF-funded services (or use local name).</td>
</tr>
<tr>
<td>10 = Section 8, public housing, or other rental assistance.</td>
</tr>
<tr>
<td>11 = Other source.</td>
</tr>
</tbody>
</table>

3.3 Physical disability
3.4 Developmental disability
3.5 HIV/AIDS
3.6 Mental Health:
Mental health problem
Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently.
3.7 Substance abuse:
Substance abuse problem
1 = Alcohol abuse.
2 = Drug abuse.
3 = Dully diagnosed.
<table>
<thead>
<tr>
<th>Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response category</td>
</tr>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Yes</td>
</tr>
</tbody>
</table>

### 3.8 Domestic violence:
(If yes) When experience occurred
<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = No</td>
</tr>
<tr>
<td>1 = Within the past three months.</td>
</tr>
<tr>
<td>2 = Three to six months ago.</td>
</tr>
<tr>
<td>3 = From six to twelve months ago.</td>
</tr>
<tr>
<td>4 = More than a year ago.</td>
</tr>
<tr>
<td>8 = Don't know.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

### 3.9 Services received:
<table>
<thead>
<tr>
<th>Response Category</th>
<th>Examples;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of service ..................................................................</td>
<td>(08/31/1965)</td>
</tr>
<tr>
<td>Service type .....................................................................</td>
<td>Emergency food programs and food pantries.</td>
</tr>
<tr>
<td>1 = Food ..........................................................................</td>
<td>Housing search.</td>
</tr>
<tr>
<td>2 = Housing placement ..................................................</td>
<td>Clothing and personal hygiene items.</td>
</tr>
<tr>
<td>3 = Material goods .......................................................</td>
<td>Rent payment or deposit assistance.</td>
</tr>
<tr>
<td>4 = Temporary housing and other financial aid .....................</td>
<td>Bus passes and mass transit tokens.</td>
</tr>
<tr>
<td>5 = Transportation ........................................................</td>
<td>Money management counseling and acquiring identification/SSN.</td>
</tr>
<tr>
<td>6 = Consumer assistance and protection.</td>
<td>Legal counseling and immigration services.</td>
</tr>
<tr>
<td>7 = Criminal justice/legal services .................................</td>
<td>GED instruction, bilingual education, and literacy programs.</td>
</tr>
<tr>
<td>8 = Education ....................................................................</td>
<td>Disability screening, health care referrals, and health education (excluding HIV/AIDS-related services, mental health care/counseling, and substance abuse services).</td>
</tr>
<tr>
<td>9 = Health care ..................................................................</td>
<td>HIV testing, AIDS treatment, AIDS/HIV prevention and counseling.</td>
</tr>
<tr>
<td>10 = HIV/AIDS-related services .........................................</td>
<td>Telephone crisis hotlines and psychiatric programs.</td>
</tr>
<tr>
<td>11 = Mental health care/counseling ...................................</td>
<td>Detoxification and alcohol/drug abuse counseling.</td>
</tr>
<tr>
<td>12 = Substance abuse services ..........................................</td>
<td>Job development and job finding assistance.</td>
</tr>
<tr>
<td>13 = Employment ..................................................................</td>
<td>Development of plans for the evaluation, treatment and/or care of persons needing assistance in planning or arranging for services.</td>
</tr>
<tr>
<td>14 = Case/care management ...............................................</td>
<td>Child care centers and infant care centers.</td>
</tr>
<tr>
<td>15 = Day care .....................................................................</td>
<td>Life skills education, social skills training, and stress management.</td>
</tr>
<tr>
<td>16 = Personal enrichment ..................................................</td>
<td>Street outreach.</td>
</tr>
<tr>
<td>17 = Outreach ....................................................................</td>
<td></td>
</tr>
<tr>
<td>18 = Other.</td>
<td></td>
</tr>
</tbody>
</table>

### 3.10 Destination:
<table>
<thead>
<tr>
<th>Response category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or campground paid for with emergency shelter voucher)*.</td>
</tr>
<tr>
<td>2 = Transitional housing for homeless persons (including homeless youth)*.</td>
</tr>
<tr>
<td>3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab).</td>
</tr>
<tr>
<td>4 = Psychiatric hospital or other psychiatric facility.</td>
</tr>
<tr>
<td>5 = Substance abuse treatment facility or detox center.</td>
</tr>
<tr>
<td>6 = Hospital (non-psychiatric).</td>
</tr>
<tr>
<td>7 = Jail, prison or juvenile detention facility.</td>
</tr>
<tr>
<td>10 = Room, apartment, or house that you rent.</td>
</tr>
<tr>
<td>11 = Apartment or house that you own.</td>
</tr>
<tr>
<td>12 = Staying or living in a family member's room, apartment, or house.</td>
</tr>
<tr>
<td>13 = Staying or living in a friend's room, apartment, or house.</td>
</tr>
<tr>
<td>14 = Hotel or motel paid for without emergency shelter voucher.</td>
</tr>
<tr>
<td>15 = Foster care home or foster care group home.</td>
</tr>
<tr>
<td>16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside).</td>
</tr>
<tr>
<td>17 = Other.</td>
</tr>
<tr>
<td>8 = Don't Know.</td>
</tr>
<tr>
<td>Tenure</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
<tr>
<td>1 = Permanent.</td>
</tr>
<tr>
<td>2 = Transitional.</td>
</tr>
<tr>
<td>8 = Don't Know.</td>
</tr>
<tr>
<td>9 = Refused.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Subsidy Type</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0 = None.</td>
<td></td>
</tr>
<tr>
<td>1 = Public housing.</td>
<td></td>
</tr>
<tr>
<td>2 = Section 8.</td>
<td></td>
</tr>
<tr>
<td>3 = S+C.</td>
<td></td>
</tr>
<tr>
<td>4 = HOME program.</td>
<td></td>
</tr>
<tr>
<td>5 = HOPWA program.</td>
<td></td>
</tr>
<tr>
<td>6 = Other housing subsidy.</td>
<td></td>
</tr>
<tr>
<td>8 = Don't Know.</td>
<td></td>
</tr>
<tr>
<td>9 = Refused.</td>
<td></td>
</tr>
</tbody>
</table>

For response categories marked with an asterisk (*), these destinations are currently not eligible for HOPWA funding.

3.11 Reason for leaving:
Reason for leaving
1 = Left for a housing opportunity before completing program.
2 = Completed program.
3 = Non-payment of rent/occupancy charge.
4 = Non-compliance with project.
5 = Criminal activity/destruction of property/violence.
6 = Reached maximum time allowed by project.
7 = Needs could not be met by project.
8 = Disagreement with rules/persons.
9 = Death.
10 = Unknown/disappeared.
11 = Other.

3.12 Employment:
Employed
0 = No
1 = Yes
If currently working, number of hours worked in the past week.

Employment tenure
0 = No
1 = Yes
1 = Permanent.
2 = Temporary.
3 = Seasonal.

If client is not currently employed, is the client looking for work.

3.13 Education:
Currently in school or working on any degree or certificate.
0 = No
1 = Yes
Received vocational training or apprenticeship certificates.

Highest level of school completed
0 = No schooling completed.
1 = Nursery school to 4th grade.
2 = 5th grade or 6th grade.
3 = 7th grade or 8th grade.
4 = 9th grade.
5 = 10th grade.
6 = 11th grade.
7 = 12th grade, No diploma.
8 = High school diploma.
9 = GED.
10 = Post-secondary school.
0 = None.

If client has received a high school diploma, GED, or enrolled in post-secondary education, what degree(s) has the client earned.
1 = Associates Degree.
2 = Bachelors.
3 = Masters.
4 = Doctorate.
5 = Other graduate/professional degree.

3.14 General Health:
1 = Excellent.
2 = Very good.
3 = Good.
4 = Fair.
5 = Poor.
8 = Don't Know.

3.15 Pregnancy Status:
Pregnancy Status
0 = No
1 = Yes
4. HMIS Privacy and Security Standards

This section of the Notice describes standards for the privacy and security of personal information collected and stored in an HMIS. The standards seek to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data. These privacy and security standards are based on principles of fair information practice and on security standards recognized by the information privacy and technology communities. The standards were developed after careful review of the Health Insurance Portability and Accountability Act (HIPAA) standards for securing and protecting patient information. Given the importance of ensuring data confidentiality, HUD intends to provide training and technical assistance for its grantees on this topic.

The section defines baseline standards that will be required of any organization (such as a Continuum of Care, homeless assistance provider, or HMIS software company) that records, uses, or processes PPI on homeless clients for an HMIS. This section also identifies additional protocols or policies that organizations may choose to implement.
to adopt to enhance further the privacy and security of information collected through HMIS. Organizations are encouraged to apply these additional protections to protect client information as they deem appropriate. They must also comply with federal, state and local laws that require additional confidentiality protections.

This two-tiered approach recognizes the broad diversity of organizations that participate in HMIS and the differing programmatic and organizational realities that may demand a higher standard for some activities. Some organizations (e.g., those serving victims of domestic violence) may choose to implement higher levels of privacy and security standards because of the nature of their homeless population and/or service provision. Others (e.g., large emergency shelters) may find the higher standards overly burdensome or impractical. At a minimum, however, all organizations must meet the baseline privacy and security requirements described in this section. This approach provides a uniform floor of protection for homeless clients with the possibility of additional protections for organizations with additional needs or capacities.

Sections 4.1 and 4.2 discuss HMIS privacy standards. Section 4.3 discusses security standards.

4.1. HMIS Privacy Standards: Definitions and Scope

4.1.1. Definition of Terms

1. Protected Personal Information (PPI). Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

2. Covered Homeless Organization (CHO). Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.

3. Processing. Any operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the information.

4. HMIS Uses and Disclosures. The uses and disclosures of PPI that are allowed by these standards.

4.1.2. Applying the HMIS Privacy and Security Standards

These privacy standards apply to any homeless assistance organization that records, uses or processes protected personal information (PPI) for an HMIS. A provider that meets this definition is referred to as a covered homeless organization (CHO). All PPI maintained by a CHO is subject to these standards.

Any CHO that is covered under the HIPAA is not required to comply with the privacy or security standards in this Notice if the CHO determines that a substantial portion of its PPI about homeless clients or homeless individuals is protected health information as defined in the HIPAA rules. Exempting HIPAA covered entities from the HMIS privacy and security rules avoids all possible conflicts between the two sets of rules. The HMIS standards give precedence to the HIPAA privacy and security rules because: (1) The HIPAA rules are more finely attuned to the requirements of the health care system; (2) the HIPAA rules provide important privacy and security protections for protected health information; and (3) requiring a homeless provider to comply with or reconcile two sets of rules would be an unreasonable burden.

It is possible that part of a homeless organization's operations may be covered by the HMIS standards while another part is covered by the HIPAA standards. A CHO that, because of organizational structure, legal requirement, or other reason, maintains personal information about a homeless client that does not fall under the privacy and security standards in this section (e.g., the information is subject to the HIPAA health privacy rule) must describe that information in its privacy notice and explain the reason the information is not covered. The purpose of the disclosure requirement is to avoid giving the impression that all personal information will be protected under the HMIS standards if other standards or if no standards apply.

4.1.3. Allowable HMIS Uses and Disclosures of Protected Personal Information (PPI)

A CHO may use or disclose PPI from an HMIS under the following circumstances: (1) To provide or coordinate services to an individual; (2) for functions related to payment or reimbursement for services; (3) to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions; or (4) for creating de-identified PPI.

CHOs, like other institutions that maintain personal information about individuals, have obligations that may transcend the privacy interests of clients. The following additional uses and disclosures recognize those obligations to use or share personal information by balancing competing interests in a responsible and limited way. Under the HMIS privacy standard, these additional uses and disclosures are permissive and not mandatory (except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards). However, nothing in this standard modifies an obligation under applicable law to use or disclose personal information.

Uses and disclosures required by law. A CHO may use or disclose PPI when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law.

Uses and disclosures to avert a serious threat to health or safety. A CHO may, consistent with applicable law and standards of ethical conduct, use or disclose PPI if: (1) The CHO, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

Uses and disclosures about victims of abuse, neglect or domestic violence. A CHO may disclose PPI about an individual whom the CHO reasonably believes to be a victim of abuse, neglect or domestic violence to a government authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence under any of the following circumstances: • Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law; • If the individual agrees to the disclosure; or • To the extent that the disclosure is expressly authorized by statute or regulation; and the CHO believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be
materially and adversely affected by waiting until the individual is able to agree to the disclosure.

A CHO that makes a permitted disclosure about victims of abuse, neglect or domestic violence must promptly inform the individual that a disclosure has been or will be made, except if:
• The CHO, in the exercise of professional judgment, believes informing the individual would place the individual at risk of serious harm; or
• The CHO would be informing a personal representative (such as a family member or friend), and the CHO reasonably believes the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as determined by the CHO, in the exercise of professional judgment.

Uses and disclosures for academic research purposes. A CHO may use or disclose PPI for academic research conducted by an individual or institution that has a formal relationship with the CHO if the research is conducted either:
• By an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a program administrator (other than the individual conducting the research) designated by the CHO; or
• By an institution for use in a research project conducted under a written research agreement approved in writing by a program administrator designated by the CHO.

A written research agreement must:
(1) Establish rules and limitations for the processing and security of PPI in the course of the research; (2) provide for the return or proper disposal of all PPI at the conclusion of the research; (3) restrict additional use or disclosure of PPI except where required by law; and (4) require that the recipient of data formally agree to comply with all terms and conditions of the agreement.

A written research agreement is not a substitute for approval of a research project by an Institutional Review Board, Privacy Board or other applicable human subjects protection institution.

Disclosures for law enforcement purposes. A CHO may, consistent with applicable law and standards of ethical conduct, disclose PPI for a law enforcement purpose to a law enforcement official under any of the following circumstances:
• In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena;
• If the law enforcement official makes a written request for protected personal information that: (1) is signed by a supervisory official of the law enforcement agency seeking the PPI; (2) states that the information is relevant and material to a legitimate law enforcement investigation; (3) identifies the PPI sought; (4) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and (5) states that de-identified information could not be used to accomplish the purpose of the disclosure.
• If the CHO believes in good faith that the PPI constitutes evidence of criminal conduct that occurred on the premises of the CHO:
  • In response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics; or
  • If (1) the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and (2) the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.

4.2. Privacy Requirements

All CHO must comply with the baseline privacy requirements described here with respect to data collection limitations; data quality; purpose and use limitations; openness; access and correction; and accountability. A CHO may adopt additional substantive and procedural privacy protections that exceed the baseline requirements for each of these areas. A CHO must comply with federal, state and local laws that require additional confidentiality protections. All additional protections must be described in the CHO’s privacy notice. A CHO must comply with all baseline privacy protections and with all additional privacy protections included in its privacy notice.

A CHO may maintain a common data storage medium with another organization (including but not limited to another CHO) that includes the sharing of PPI. When PPI is shared between organizations, responsibilities for privacy and security may reasonably be allocated between the organizations.

Organizations sharing a common data storage medium and PPI may adopt differing privacy and security policies as they deem appropriate, administratively feasible, and consistent with these HMIS privacy and security standards, as long as these privacy and security policies allow for the unduplication of homeless clients at the CoC level.

4.2.1. Collection Limitation

Baseline requirement. A CHO may collect PPI only when appropriate to the purposes for which the information is obtained or when required by law. A CHO must collect PPI by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.

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. Providers may use the following language to meet this standard: “We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.”

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:
(1) Restricting collection of personal data, other than required HMIS data elements;
(2) Collecting PPI only with the express knowledge or consent of the individual (unless required by law); and
(3) Obtaining oral or written consent from the individual for the collection of personal information from the individual or from a third party.

4.2.2 Data Quality

Baseline Requirement. PPI collected by a CHO must be relevant to the purpose for which it is to be used. To the extent necessary for those purposes, PPI should be accurate, complete and timely.

A CHO must develop and implement a plan to dispose of or, in the alternative, to remove identifiers from, PPI that is not in current use seven years after the PPI was created or last changed.
(unless a statutory, regulatory, contractual, or other requirement mandates longer retention). Standards for destroying information are provided in Section 4.3.

4.2.3. Purpose Specification and Use Limitation

Baseline Requirement. A CHO must specify in its privacy notice the purposes for which it collects PPI and must describe all uses and disclosures. A CHO may use or disclose PPI only if the use or disclosure is allowed by this standard and is described in its privacy notice. A CHO may infer consent for all uses and disclosures specified in the notice and for uses and disclosures determined by the CHO to be compatible with those specified in the notice.

Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures are permissible and not mandatory. Uses and disclosures not specified in the privacy notice can be made only with the consent of the individual or when required by law.

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS privacy requirements, including, but not limited to:

(1) Seeking either oral or written consent for some or all processing when individual consent for a use, disclosure or other form of processing is appropriate;
(2) Agreeing to additional restrictions on use or disclosure of an individual’s PPI at the request of the individual if the request is reasonable. The CHO is bound by the agreement, except if inconsistent with legal requirements;
(3) Limiting uses and disclosures to those specified in its privacy notice and to other uses and disclosures that are necessary for those specified;
(4) Committing that PPI may not be disclosed directly or indirectly to any government agency (including a contractor or grantee of an agency) for inclusion in any national homeless database that contains personal protected information unless required by statute;
(5) Committing to maintain an audit trail containing the date, purpose and recipient of some or all disclosures of PPI;
(6) Committing to make audit trails of disclosures available to the homeless individual; and
(7) Limiting disclosures of PPI to the minimum necessary to accomplish the purpose of the disclosure.

4.2.4. Openness

Baseline Requirement. A CHO must publish a privacy notice describing its policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request. If a CHO maintains a public web page, the CHO must post the current version of its privacy notice on the web page. A CHO may, if appropriate, omit its street address from its privacy notice. A CHO must post a sign stating the availability of its privacy notice to any individual who requests a copy.

A CHO must state in its privacy notice that the policy may be amended at any time and that amendments may affect information obtained by the CHO before the date of the change. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. All amendments to the privacy notice must be consistent with the requirements of these privacy standards. A CHO must maintain permanent documentation of all privacy notice amendments.

CHOs are reminded that they are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. See 24 CFR 8.6; 28 CFR 36.303. Note: This obligation does not apply to CHOs who do not receive federal financial assistance and who are also exempt from the requirements of Title III of the Americans with Disabilities Act because they qualify as “religious entities” under that Act.

In addition, CHOs that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program. See HUD Limited English Proficiency Recipient Guidance published on December 18, 2003 (68 FR 70968).

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

(1) Making a reasonable effort to offer a copy of the privacy notice to each client at or around the time of data collection or at another appropriate time;
(2) Giving a copy of its privacy notice to each client on or about the time of first data collection. If the first contact is over the telephone, the privacy notice may be provided at the first in-person contact (or by mail, if requested); and/or
(3) Adopting a policy for changing its privacy notice that includes advance notice of the change, consideration of public comments, and prospective application of changes.

4.2.5. Access and Correction

Baseline Requirement. In general, a CHO must allow an individual to inspect and to have a copy of any PPI about the individual. A CHO must offer to explain any information that the individual may not understand.

A CHO must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual. A CHO is not required to remove any information but may, in the alternative, mark information as inaccurate or incomplete and may supplement it with additional information.

In its privacy notice, a CHO may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual’s PPI:

(1) Information compiled in reasonable anticipation of litigation or comparable proceedings;
(2) Information about another individual (other than a health care or homeless provider);
(3) Information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; or
(4) Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

A CHO can reject repeated or harassing requests for access or correction. A CHO that denies an individual’s request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the protected personal information about the individual.

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

(1) Accepting an appeal of a denial of access or correction by adopting its own
appeal procedure and describing the procedure in its privacy notice;
(2) Limiting the grounds for denial of access by not stating a recognized basis for denial in its privacy notice;
(3) Allowing an individual whose request for correction has been denied to add to the individual’s information a concise statement of disagreement. A CHO may agree to disclose the statement of disagreement whenever it discloses the disputed PII to another person. These procedures must be described in the CHO’s privacy notice; and/or
(4) Providing to an individual a written explanation of the reason for a denial of an individual’s request for access or correction.

4.2.6. Accountability

Baseline Requirement. A CHO must establish a procedure for accepting and considering questions or complaints about its privacy and security policies and practices. A CHO must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (annually or otherwise) a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.

Additional Privacy Protections. A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:
(1) Requiring each member of its staff (including employees, volunteers, affiliates, contractors and associates) to undergo (annually or otherwise) formal training in privacy requirements;
(2) Establishing a method, such as an internal audit, for regularly reviewing compliance with its privacy policy;
(3) Establishing an internal or external appeal process for hearing an appeal of a privacy complaint or an appeal of a denial of access or correction rights; and/or
(4) Designating a chief privacy officer to supervise implementation of the CHO’s privacy standards.

4.3. Security Standards

This section describes the standards for system, application and hard copy security. All CHOs must comply with the baseline security requirements. A CHO may adopt additional security protections that exceed the baseline requirements if it chooses.

4.3.1. System Security

Applicability. Baseline Requirement. A CHO must apply system security provisions to all the systems where personal protected information is stored, including, but not limited to, a CHO’s networks, desktops, laptops, mini-computers, mainframes and servers.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by applying system security provisions to all electronic and hard copy information that is not collected specifically for the HMIS. A CHO may also seek an outside organization to perform an internal security audit and certify system security.

User Authentication. Baseline Requirement. A CHO must secure HMIS systems with, at a minimum, a user authentication system consisting of a username and a password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
(1) Using at least one number and one letter;
(2) Not using, or including, the username, the HMIS name, or the HMIS vendor’s name; and/or
(3) Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards. Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use. Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location. Individual users must not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Additional Security Protections. A CHO may commit to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:
(1) upper and lower-case letters; 
(2) numbers; and/or
(3) symbols.

A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase, and substitute numbers and symbols for letters in any given word. For example, the phrase “secure password” can be modified to “$3cur3F@SSw0rd” by replacing the letter “s” with “$,” the letter “e” with the number “3,” the letter “a” with “@,” and the letter “o” with the number “0,” and eliminating spaces between words.

Virus Protection. Baseline Requirement. A CHO must protect HMIS systems from viruses by using commercially available virus protection software. Virus protection must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed. A CHO must regularly update virus definitions from the software vendor.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically scanning all files for viruses when the system is turned on, shut down or not actively being used.

Firewalls. Baseline Requirement. A CHO must protect HMIS systems from malicious intrusion behind a secure firewall. Each individual workstation does not need its own firewall, as long as there is a firewall between that workstation and any systems, including the Internet and other computer networks, located outside of the organization. For example, a workstation that accesses the Internet through a modem would need its own firewall. A workstation that accesses the Internet through a central server would not need a firewall as long as the server has a firewall. Firewalls are commonly included with all new operating systems. Older operating systems can be equipped with secure firewalls that are available both commercially and for free on the Internet.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by applying a firewall to all HMIS workstations and systems.

Public Access. Baseline Requirement. HMIS that use public forums for data collection or reporting must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, or extranets that limit access based on the Internet Provider (IP) address, or similar means. A public forum includes systems with public access to any part of the computer through the Internet, modems, bulletin boards, public kiosks or similar areas. Further information on these tools can be found in the HMIS Consumer Guide and the HMIS Implementation Guide, both available on HUD’s Web site.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates and extranets that limit access based on the IP address. A very secure system would not house any.
HMIS data on systems that are accessible to the general public.

Physical Access to Systems With Access to HMIS Data. Baseline Requirement. A CHO must staff computers stationed in public areas that are used to collect and store HMIS data at all times. When workstations are not in use and staff are not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals. After a short amount of time, workstations should automatically turn on a password protected screen saver when the workstation is temporarily not in use. Password protected screen savers are a standard feature with most operating systems and the amount of time can be regulated by a CHO. If staff from a CHO will be gone for an extended period of time, staff should log off the data entry system and shut down the computer.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically logging users on to the designated user account on the designated computer. Most server operating systems come equipped with the needed software to automatically perform these functions. If staff from a CHO will be gone for an extended period of time, staff should store the computer and data in a locked room.

Disaster Protection and Recovery. Baseline Requirement. A CHO must copy all HMIS data on a regular basis to another machine, tape, or some other secure off-site location where the data can be retrieved in the event of a disaster. This would also apply to a CHO that stores data in a central server, mini-computer or mainframe must store the central server, mini-computer or mainframe in a secure room with appropriate temperature control and fire suppression systems. Surge suppressors must be used to protect systems used for collecting and storing all the HMIS data.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by providing, among other options, fire and water protection at the off-site location that houses the storage medium. A CHO may also seek an outside organization to conduct a disaster protection audit.

Disposal. Baseline Requirement. In order to delete all HMIS data from a data storage medium, a covered homeless organization must reformat the storage medium. A CHO should reformat the storage medium more than once before reusing or disposing of the medium.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by destroying media at a bonded vendor to ensure all the HMIS data is completely destroyed.

System Monitoring. Baseline Requirement. A CHO must use appropriate methods to monitor security systems. Systems that have access to any HMIS data must maintain a user access log. Many new operating systems and web servers are equipped with access logs and some allow the computer to email the log information to a designated user, usually a system administrator. Logs must be checked routinely.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by checking user access logs routinely for inappropriate access, and hardware and software problems, errors and viruses, or purchasing one of several software applications available that track the status of individual files on computers. These applications are used to make sure that files are not being changed when they are not supposed to be. The applications inform the system administrator if a computer has been hacked, infected with a virus, has been restarted, or if the data files have been tampered with.

4.3.2. Application Security
These provisions apply to how all the HMIS data are secured by the HMIS application software.

Applicability. Baseline Requirement. A CHO must apply application security provisions to the software during data entry, storage and review or any other processing function.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements as needed.

User Authentication. Baseline Requirement. A CHO must secure all electronic HMIS data with, at a minimum, a user authentication system consisting of a username and a password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
1. Using at least one number and one letter;
2. Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use;
3. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and
4. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location. Individual users should not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Electronic Data Transmission. Baseline Requirement. A CHO must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks or phone lines to current industry standards. The current standard is 128-bit encryption. Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any lower systems to transmit the data. A secure network would have secure direct connections.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates to verify the workstations involved in the electronic data transmission, and by restricting access between the workstations using IP addresses. A very secure system would not transmit any protected information over a public system like the Internet.

Electronic Data Storage. Baseline Requirement. A CHO must store all HMIS data in a binary, not text, format. A CHO that uses one of several common
applications (e.g., Microsoft Access, Microsoft SQL Server and Oracle) are already storing data in binary format and no other steps need to be taken.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by requiring that all PPI be stored in an encrypted format using at least the current industry standard. The current standard is a 128-bit key.

4.3.3. Hard Copy Security

This section provides standards for securing hard copy data.

Applicability. Baseline Requirement. A CHO must secure any paper or other hard copy containing personal protected information that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms.

Additional Security Protections. A CHO may commit itself to additional security protections consistent with HMIS requirements by applying hard copy security provisions to paper and hard copy information that is not collected specifically for the HMIS.

Security. Baseline Requirement. A CHO must supervise at all times any paper or other hard copy generated by or for HMIS that contains PPI when the hard copy is in a public area. When CHO staff are not present, the information must be secured in areas that are not publicly accessible.

Written information specifically pertaining to user access (e.g., username and password) must not be stored or displayed in any publicly accessible location.

5. Technical Standards

This section presents the technical standards that will be required for HMIS applications and for the organizations responsible for storing HMIS data. Except as otherwise provided, these standards do not specify or recommend any particular operating system, development environment, networking environment, database, hardware or other aspect of the HMIS application. This part of the Notice is primarily directed to HMIS developers and CoC system administrators.

5.1. Required HMIS Capabilities

5.1.1. Automatic Generation of Identification Numbers and Information

Based on the data collected through the client assessment process, program staff interviews, self-administered forms or review of case management records, the HMIS application must be capable of automatically generating data for each record. This capability includes the automatic generation of:

1. Unique Personal Identification Numbers (PINs) for persons who have not been previously served within the CoC, and reassignment of PINs for persons who have been served previously within a program and/or the CoC;

2. Program Identification Information that is uniquely associated with each program within a CoC and is assigned to every service episode for each client; and,

3. Household Identification Numbers for persons who have been identified as members of a household that participated in the same service episode.

Program Identification Numbers (PINs). A PIN is a number automatically generated by the HMIS application. All records associated with the same person should be assigned the same PIN. There is no required format for the PIN as long as there is a single unique PIN for every client served in the CoC and it contains no personally-identifying information. The PIN is used to produce an unduplicated count of all persons at three levels: (1) Within a single program; (2) across multiple programs that share HMIS data (where programs agree to share such data); and/or (3) across the entire CoC database, whether or not data are shared across programs within a CoC. At each level, an HMIS must be capable of searching client records to determine if clients have been previously served. The search must involve the matching of client records using personal identifier fields (e.g., Name, Social Security Number, Date of Birth, and Gender) to retrieve a record(s) with identical or similar values in each of these fields.

Program Identification Information. Program identification information for every program offered in a CoC consists of the following four fields:

1. Federal Information Processing Standards (FIPS) Code. To find the 10-digit FIPS code consisting of a 2-digit state code, 3-digit county code and 5-digit place code: (1) Go to Web site http://geonames.usgs.gov/fips55.html; (2) click on “Search the FIPS55 Data Base;” (3) click on state from “State Number Code” pull down menu (this also tells you 2-digit state code); (4) type town or city name in “FIPS 55 Feature Name” box; and (5) click on “Send Query” and 3-digit county code and 5-digit place code will be shown;

2. Facility Code (to be locally determined);

3. Continuum of Care (CoC) Code (HUD-assigned); and

4. Program Type Code.
5.1.2. Missing Value Categories

A limited number of data elements require "don't know," "not applicable" and "refused" response categories for close-ended questions. These missing value categories and their associated codes should appear on the same list as the valid responses. For open-ended questions (e.g., name), the HMIS application should include the "don't know," "not applicable" and "refused" response categories for each field in the data element (e.g., first name, last name, middle initial and suffix).

5.1.3. Other Response Categories

Certain data elements may contain a response category labeled "other." When a data element contains such an option, there should also be within the same database table a separate alphanumeric field where the "other" value may be entered by program staff. For instance, a coded field that accepts the values "0=Red," "1=Yellow," or "2=Other" should have an accompanying field that accepts open-ended answers such as tangerine, blue or magenta.

5.1.4. Response Category Codes

Where character or numeric codes are shown next to each response category, only the character or numeric response code needs to be stored in the database. For example, "1=Yes" will be the response code on the computer screen or hard copy, but the electronic database can store "1=Yes" responses as a "1" in the database. For open-ended or text answers (such as name), the full text answer or an encrypted version of it should be stored in the database.

5.1.5. Exit Dates

The HMIS should identify programs that have fixed lengths of enrollment. When a client enters such a program, the HMIS should automatically generate the exit date based on the entry date and the program's fixed length of enrollment. For example, an overnight emergency shelter has a fixed length of stay of one day. This information would be stored with the other program information like FIPS code and program code. When a client enrolls in an overnight emergency shelter, the HMIS will automatically set the client's exit date for the next day.

5.1.6. Maintaining Historical Data

An HMIS should have the ability to record client data from a limitless number of service transactions for longitudinal data analysis and assessment of client outcomes (often referred to as a "transactional" or "relational" database structure). A transactional or relational database organizes data within a set of tables from which data can be accessed or reassembled in many different ways without having to erase historical data or reorganize the database tables. For example, an HMIS may include a table that describes a client's demographic profile with columns for name, SSN, date of birth, gender, and so on. In most cases, the information in the profile table will not change. Another table may describe the client's income status: source of income, amount of income from each source, receipt of non-cash benefits, and so forth. The information in the income status table may change overtime, but all historical data should be preserved. Additional tables may include data from each service encounter by program type (e.g., mental health and/or substance abuse).

5.1.7. Data Export

Although a standard environment is not specified, any HMIS application must be capable of exporting any and all data collected into a comma-separated values text file using the following format:

- All fields in a given record are separated by a comma;
- All records within a given text file contain the same fields;
- Blank fields are signified by the comma ending the previous field (or the beginning of the line if the field is the first in the record) followed by a comma indicating the end of the empty field;
- Fields containing text information (as opposed to numeric) will be surrounded by double quotes whenever the field includes blank spaces, commas, or other symbols not part of the standard alphabet;

- The first line of the file shall be a list of the field names included in every record in the file; and
- The list of field names shall be in the same format described above.

5.2. Continuum of Care Requirements

5.2.1. Storage Requirements

The CoC must have or designate a central coordinating body that will be responsible for centralized collection and storage of HMIS data. HMIS data must be collected to a central location at least once a year from all HMIS users within the CoC.

HMIS data must be stored at the central location for a minimum of seven years after the date of collection by the central coordinating body or designee of the CoC. The seven-year requirement is the current government standard for health and medical information.

Environmental Impact

This notice does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing, rehabilitation, alteration, demolition, or new construction, or establish, revise or provide for standards for construction or construction materials, manufactured hous.ng. or occupancy. Accordingly, under 24 CFR 50.19(c)(1), this notice is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321).


Nelson R. Bregin,
General Deputy Assistant Secretary for Community Planning and Development.

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Appendix E

HUD HMIS Privacy and Security Standards - Summary
NOTE:
The Alameda County-wide Homeless Continuum of Care Council has chosen to implement some of the “Additional Privacy Protections” listed in this document. Additional Privacy Protections with which participating agencies/jurisdictions are required to comply are bolded in this document.

4.1. HMIS Privacy Standards: Definitions and Scope

4.1.1. Definition of Terms

Protected Personal Information (PPI)
Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that:

(1) Identifies, either directly or indirectly, a specific individual;
(2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or
(3) can be linked with other available information to identify a specific individual.

Covered Homeless Organization (CHO)
Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.

Processing
Any operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the information.

HMIS Uses and Disclosures
The uses and disclosures of PPI that are allowed by these standards.
4.2. Privacy-Requirements

- All CHO's must comply with the baseline privacy requirements described here with respect to: data collection limitations; data quality; purpose and use limitations; openness; access and correction; and accountability.

- A CHO may adopt additional substantive and procedural privacy protections that exceed the baseline requirements for each of these areas.

- A CHO must comply with federal, state and local laws that require additional confidentiality protections.

- All additional protections must be described in the CHO's privacy notice.

- A CHO must comply with all baseline privacy protections and with all additional privacy protections included in its privacy notice.

- A CHO may maintain a common data storage medium with another organization (including but not limited to another CHO) that includes the sharing of PPI.

- When PPI is shared between organizations, responsibilities for privacy and security may reasonably be allocated between the organizations.

- Organizations sharing a common data storage medium and PPI may adopt differing privacy and security policies as they deem appropriate, administratively feasible, and consistent with these HMIS privacy and security standards, as long as these privacy and security policies allow for the unduplication of homeless clients at the CoC level.
4.2.1. Collection Limitation

**Baseline Requirement.**

- A CHO may collect PPI only when appropriate to the purposes for which the information is obtained or when required by law.
- A CHO must collect PPI by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.
- 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.
- Providers may use the following language to meet this standard:

  "We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate."

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Restricting collection of personal data, other than required HMIS data elements;
2. Collecting PPI only with the express knowledge or consent of the individual (unless required by law); and
3. Obtaining oral or written consent from the individual for the collection of personal information from the individual or from a third party.

4.2.2. Data Quality

**Baseline Requirement.**

- PPI collected by a CHO must be relevant to the purpose for which it is to be used. To the extent necessary for those purposes, PPI should be accurate, complete and timely,
- A CHO must develop and implement a plan to dispose of or, in the alternative, to remove identifiers from, PPI that is not in current use seven years after the PPI was created or last changed (unless a statutory, regulatory, contractual, or other requirement mandates longer retention). Standards for destroying information are provided in Section 4.3.
4.2.3. **Purpose Specification and Use Limitation**

**Baseline Requirement**

- A CHO must specify in its privacy notice the purposes for which it collects PPI and must describe all uses and disclosures.
- A CHO may use or disclose PPI only if the use or disclosure is allowed by this standard and is described in its privacy notice.
- A CHO may infer consent for all uses and disclosures specified in the notice and for uses and disclosures determined by the CHO to be compatible with those specified in the notice.
- Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures are permissive and not mandatory.
- Uses and disclosures not specified in the privacy notice can be made only with the consent of the individual or when required by law.

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. Seeking either oral or written consent for some or all processing when individual consent for a use, disclosure or other form of processing is appropriate;

2. **Agreeing to additional restrictions on use or disclosure of an individual's PPI at the request of the individual if the request is reasonable.** The CHO is bound by the agreement, except if inconsistent with legal requirements;

3. Limiting uses and disclosures to those specified in its privacy notice and to other uses and disclosures that are necessary for those specified;

4. Committing that PPI may not be disclosed directly or indirectly to any government agency (including a contractor or grantee of an agency) for inclusion in any national homeless database that contains personal protected information unless required by statute;

5. Committing to maintain an audit trail containing the date, purpose and recipient of some or all disclosures of PPI;

6. Committing to make audit trails of disclosures available to the homeless individual; and

7. Limiting disclosures of PPI to the minimum necessary to accomplish the purpose of the disclosure.
4.2.4. **Openness**

*Baseline Requirement.*

- A CHO must publish a privacy notice describing its policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request.

- If a CHO maintains a public web page, the CHO must post the current version of its privacy notice on the web page.

- A CHO may, if appropriate, omit its street address from its privacy notice.

- A CHO must post a sign stating the availability of its privacy notice to any individual who requests a copy.

- A CHO must state in its privacy notice that the policy may be amended at any time and that amendments may affect information obtained by the CHO before the date of the change. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. All amendments to the privacy notice must be consistent with the requirements of these privacy standards. A CHO must maintain permanent documentation of all privacy notice amendments.

- CHO’s are reminded that they are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. See 24 CFR 8.6; 28 CFR 36.303. Note: This obligation does not apply to CHO’s who do not receive federal financial assistance and who are also exempt from the requirements of Title III of the Americans with Disabilities Act because they qualify as "religious entities" under that Act.

- CHO’s that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program. See HUD Limited English Proficiency Recipient Guidance published on December 18, 2003 (68 FR 70968).

*Additional Privacy Protections.*

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. making a reasonable effort to offer a copy of the privacy notice to each client at or around the time of data collection or at another appropriate time;

2. giving a copy of its privacy notice to each client on or about the time of first data collection. If the first contact is over the telephone, the privacy notice may be provided at the first in-person contact (or by mail, if requested); and/or

3. adopting a policy for changing its privacy notice that includes advance notice of the change, consideration of public comments, and prospective application of changes.
4.2.5. **Access and Correction**

**Baseline Requirement.**

- A CHO must allow an individual to inspect and to have a copy of any PPI about the individual. A CHO must offer to explain any information that the individual may not understand.

- A CHO must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual.

- A CHO is not required to remove any information but may, in the alternative, mark information as inaccurate or incomplete and may supplement it with additional information.

- In its privacy notice, a CHO may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual's PPI:
  1. Information compiled in reasonable anticipation of litigation or comparable proceedings;
  2. Information about another individual (other than a health care or homeless provider);
  3. Information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; or
  4. Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

- A CHO can reject repeated or harassing requests for access or correction.

- A CHO that denies an individual's request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the protected personal information about the individual.

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. **Accepting an appeal of a denial of access or correction by adopting its own appeal procedure and describing the procedure in its privacy notice;**

2. Limiting the grounds for denial of access by not stating a recognized basis for denial in its privacy notice;

3. Allowing an individual whose request for correction has been denied to add to the individual's information a concise statement of disagreement. A CHO may agree to disclose the statement of disagreement whenever it discloses the disputed PPI to another person. These procedures must be described in the CHO's privacy notice; and/or

4. Providing to an individual a written explanation of the reason for a denial of an individual's request for access or correction.
4.2.6. **Accountability**

**Baseline Requirement.**

- A CHO must establish a procedure for accepting and considering questions or complaints about its privacy and security policies and practices.
- A CHO must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (annually or otherwise) a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.

**Additional Privacy Protections.**

A CHO may, in its privacy notice, commit itself to additional privacy protections consistent with HMIS requirements, including, but not limited to:

1. **Requiring each member of its staff (including employees, volunteers, affiliates, contractors and associates) to undergo (annually or otherwise) formal training in privacy requirements;**
2. **Establishing a method, such as an internal audit, for regularly reviewing compliance with its privacy policy;**
3. **Establishing an internal or external appeal process for hearing an appeal of a privacy complaint or an appeal of a denial of access or correction rights; and/or**
4. **Designating a chief privacy officer to supervise implementation of the CHO's privacy standards.**
4.3. Security Standards

This section describes the standards for system, application and hard copy security. All CHO's must comply with the baseline security requirements. A CHO may adopt additional security protections that exceed the baseline requirements if it chooses.

4.3.1. System Security

Applicability.

Baseline Requirement.

- A CHO must apply system security provisions to all the systems where personal protected information is stored, including, but not limited to, a CHO's networks, desktops, laptops, mini-computers, mainframes and servers.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by applying system security provisions to all electronic and hard copy information that is not collected specifically for the HMIS.
- A CHO may also seek an outside organization to perform an internal security audit and certify system security.

User Authentication.

Baseline Requirement.

- A CHO must secure HMIS systems with, at a minimum, a user authentication system consisting of a username and a password.
- Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
  1. Using at least one number and one letter;
  2. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and/or
  3. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.
- Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use.
- Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location.
- Individual users must not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.
Additional Security Protections.

- A CHO may commit to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:
  1. upper and lower-case letters;
  2. numbers; and/or
  3. symbols.

- A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase, and substitute numbers and symbols for letters in any given word.

For example, the phrase "secure password" can be modified to "S3cur3P@$wOrd" by replacing the letter "s" with "$," the letter "e" with the number "3," the letter "a" with "@" and the letter "o" with the number "O," and eliminating spaces between words.

Virus Protection.

Baseline Requirement.

- A CHO must protect HMIS systems from viruses by using commercially available virus protection software.

- Virus protection must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed.

- A CHO must regularly update virus definitions from the software vendor.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically scanning all files for viruses when the system is turned on, shut down or not actively being used.
Firewalls.

Baseline Requirement.

- A CHO must protect HMIS systems from malicious intrusion behind a secure firewall.
- Each individual workstation does not need its own firewall, as long as there is a firewall between that workstation and any systems, including the Internet and other computer networks, located outside of the organization.

For example, a workstation that accesses the Internet through a modem would need its own firewall.

A workstation that accesses the Internet through a central server would not need a firewall as long as the server has a firewall.

Firewalls are commonly included with all new operating systems.

Older operating systems can be equipped with secure firewalls that are available both commercially and for free on the Internet.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by applying a firewall to all HMIS workstations and systems.

Public Access.

Baseline Requirement.

- HMIS that use public forums for data collection or reporting must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, or extranets that limit access based on the Internet Provider (IP) address, or similar means.
- A public forum includes systems with public access to any part of the computer through the Internet, modems, bulletin boards, public kiosks or similar arenas. Further information on these tools can be found in the HMIS Consumer Guide and the HMIS Implementation Guide, both available on HUD's Web site.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates and extranets that limit access based on the IP address.
- A very secure system would not house any HMIS data on systems that are accessible to the general public.

Baseline Requirement.

- A CHO must staff computers stationed in public areas that are used to collect and store HMIS data at all times.
- When workstations are not in use and staff are not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals.
- After a short amount of time, workstations should automatically turn on a password protected screen saver when the workstation is temporarily not in use. Password protected screen savers are a standard feature with most operating systems and the amount of time can be regulated by a CHO.
- If staff from a CHO will be gone for an extended period of time, staff should log off the data entry system and shut down the computer.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by automatically logging users off of the HMIS application after a period of inactivity and automatically logging users off of the system after a period of inactivity.
- Most server operating systems come equipped with the needed software to automatically perform these functions. If staff from a CHO will be gone for an extended period of time, staff should store the computer and data in a locked room.

Disaster Protection and Recovery.

Baseline Requirement.

- A CHO must copy all HMIS data on a regular basis to another medium (e.g., tape) and store it in a secure off-site location where the required privacy and security standards would also apply.
- A CHO that stores data in a central server, mini-computer or mainframe must store the central server, mini-computer or mainframe in a secure room with appropriate temperature control and fire suppression systems.
- Surge suppressors must be used to protect systems used for collecting and storing all the HMIS data.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by providing, among other options, fire and water protection at the off-site location that houses the storage medium.
- A CHO may also seek an outside organization to conduct a disaster protection audit.
Disposal.

Baseline Requirement.
- In order to delete all HMIS data from a data storage medium, a covered homeless organization must reformat the storage medium. A CHO should reformat the storage medium more than once before reusing or disposing the medium.

Additional Security Protections.
- A CHO may commit itself to additional security protections consistent with HMIS requirements by destroying media at a bonded vendor to ensure all the HMIS data is completely destroyed.

System Monitoring.

Baseline Requirement.
- A CHO must use appropriate methods to monitor security systems.
- Systems that have access to any HMIS data must maintain a user access log.

Many new operating systems and web servers are equipped with access logs and some allow the computer to email the log information to a designated user, usually a system administrator.
- Logs must be checked routinely.

Additional Security Protections.
- A CHO may commit itself to additional security protections consistent with HMIS requirements by checking user access logs routinely for inappropriate access, hardware and software problems, errors and viruses, or purchasing one of several software applications available that track the status of individual files on computers.

These applications are used to make sure that files are not being changed when they are not supposed to be. The applications inform the system administrator if a computer has been hacked, infected with a virus, has been restarted, or if the data files have been tampered with.

4.3.2. Application Security

These provisions apply to how all the HMIS data are secured by the HMIS application software.

Applicability.

Baseline Requirement.
- A CHO must apply application security provisions to the software during data entry, storage and review or any other processing function.

Additional Security Protections.
A CHO may commit itself to additional security protections consistent with HMIS requirements as needed.
User Authentication.

Baseline Requirement.

- A CHO must secure all electronic HMIS data with, at a minimum, a user authentication system consisting of a username and a password.

- Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
  1. Using at least one number and one letter;
  2. Using default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use;
  3. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and
  4. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

- Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location.

- Individual users should not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Additional Security Protections.

- A CHO may commit itself to additional security protections consistent with HMIS requirements by including one of each of the following kinds of characters in the password:
  1. Upper and lower-case letters;
  2. Numbers; and
  3. Symbols.

- A common solution to creating complex passwords is to use phrases instead of individual words as passwords, capitalize each new word in the phrase and substitute numbers and symbols for letters in any given word.

For example, the phrase "secure password" can be modified to "$3cur3P@$swOrd" by replacing the letter "s" with "," the letter "e" with the number "3," the letter "a" with "," and the letter "o" with the number "O," and eliminating spaces between words.
Electronic Data Transmission.

**Baseline Requirement.**

- A CHO must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks or phone lines to current industry standards. The current standard is 128-bit encryption.

- Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network would have secure direct connections.

**Additional Security Protections.**

- A CHO may commit itself to additional security protections consistent with HMIS requirements by using PKI certificates to verify the workstations involved in the electronic data transmission, and by restricting access between the workstations using IP addresses.

- A very secure system would not transmit any protected information over a public system like the Internet.

Electronic Data Storage.

**Baseline Requirement.**

- A CHO must store all HMIS data in a binary, not text, format.

- A CHO that uses one of several common applications [e.g., Microsoft Access, Microsoft SQL Server and Oracle] are already storing data in binary format and no other steps need to be taken.

**Additional Security Protections.**

- A CHO may commit itself to additional security protections consistent with HMIS requirements by requiring that all PPI be stored in an encrypted format using at least the current industry standard. The current standard is a 128-bit key.
4.3.3. **Hard Copy Security**

This section provides standards for securing hard copy data.

**Applicability.**

**Baseline Requirement.**

- A CHO must secure any paper or other hard copy containing personal protected information that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms.

**Additional Security Protections.**

- A CHO may commit itself to additional security protections consistent with HMIS requirements by applying hard copy security provisions to paper and hard copy information that is not collected specifically for the HMIS.

**Security.**

**Baseline Requirement.**

- A CHO must supervise at all times any paper or other hard copy generated by or for HMIS that contains PPI when the hard copy is in a public area.
- When CHO staff are not present, the information must be secured in areas that are not publicly accessible.
- Written information specifically pertaining to user access (e.g., username and password) must not be stored or displayed in any publicly accessible location.
5. Technical Standards

This section presents the technical standards that will be required for HMIS applications and for the organizations responsible for storing HMIS data. Except as otherwise provided, these standards do not specify or recommend any particular operating system, development environment, networking environment, database, hardware or other aspect of the HMIS application. This part of the Notice is primarily directed to HMIS developers and CoC system administrators.

5.1. Required HMIS Capabilities.

5.1.1. Automatic Generation of Identification Numbers and Information

Based on the data collected through the client assessment process, program staff interviews, self-administered forms or review of case management records, the HMIS application must be capable of automatically generating data for each record. This capability includes the automatic generation of:

1. Unique Personal Identification Numbers (PINs) for persons who have not been previously served within the CoC, and reassignment of PINs for persons who have been served previously within a program and/or the CoC;

2. Program Identification Information that is uniquely associated with each program within a CoC and is assigned to every service episode for each client; and,

3. Household Identification Numbers for persons who have been identified as members of a household that participated in the same service episode.

Personal Identification Numbers (PINs). A PIN is a number automatically generated by the HMIS application. All records associated with the same person should be assigned the same PIN. There is no required format for the PIN as long as there is a single unique PIN for every client served in the CoC and it contains no personally-identifying information. The PIN is used to produce an unduplicated count of all persons at three levels:

1. Within a single program;

2. across multiple programs that share HMIS data (where programs agree to share such data); and/or

3. across the entire CoC database, whether or not data are shared across programs within a CoC.

At each level, an HMIS must be capable of searching client records to determine if clients have been previously served. The search must involve the matching of client records using personal identifier fields (e.g., Name, Social Security Number, Date of Birth, and Gender) to retrieve a record(s) with identical or similar values in each of these fields.
**Program Identification Information.**

Program identification information for every program offered in a CoC consists of the following four fields:


2. click on "Search the FIPS55 Data Base"; (3) click on state from "State Number Code" pull down menu (this also tells you 2-digit state code); (4) type town or city name in "FIPS 55 Feature Name" box; and (5) click on "Send Query" and 3-digit county code and 5-digit place code will be shown; (2) Facility Code (to be locally determined);

3. Continuum of Care (CoC) Code (HUD-assigned); and

4. Program Type Code:
   1 = Emergency shelter (e.g., facility or vouchers)
   2 = Transitional housing
   3 = Permanent supportive housing
   4 = Street outreach
   5 = Homeless prevention (e.g., security deposit or one month’s rent)
   6 = Services-only type of program
   7 = Other

The FIPS code, facility code, CoC code and program type code should be separate fields in the HMIS application. There is no requirement to merge them into a single field. For each client intake program staff are only required to enter the program type code. Programs may choose to provide more detailed response categories for the services-only type program response. However, for reporting purposes, these detailed categories must be collapsed into a single service-only type category and its associated code.

A corresponding FIPS code, facility code and CoC code should be automatically generated by the HMIS based on which facility is doing the intake. Once program identification information has been created, the HMIS must ensure that the information is associated with every service episode recorded within the CoC.
Household Identification Numbers.

HMIS must generate the same Household Identification Number for every person designated by program staff as being together for an episode of service. The household identification numbers assigned will be maintained in each person's permanent record and will be unique for each service episode experienced by the client.

As discussed in previous parts of this final Notice, when a group of persons apply for services together (as a household or family), information is first recorded for the household head who is applying for services and then information is recorded for any children under 18 years of age who are applying for services with the household head. The children do not need to be present at the time the household head applies for services. The same household identification number is assigned to the adult head of household and any children who have been identified as applying for services with the head. If there are other adult members of the household (over 18 years of age) who are reported to be part of this household, a separate intake is conducted. As part of this intake, this individual is assigned the same household identification number as the other household members.
5.1.2. Missing Value Categories

A limited number of data elements require "don't know," "not applicable" and "refused" response categories for close-ended questions. These missing value categories and their associated codes should appear on the same list as the valid responses. For open-ended questions (e.g., name), the HMIS application should include the "don't know," "not applicable" and "refused" response categories for each field in the data element (e.g., first name, last name, middle initial and suffix).

5.1.3. Other Response Categories

Certain data elements may contain a response category labeled "other." When a data element contains such an option, there should also be within the same database table a separate alphanumeric field where the "other" value may be entered by program staff. For instance, a coded field that accepts the values "0=Red," "1=Yellow," or "9=other" should have an accompanying field that accepts open-ended answers such as tangerine, blue or magenta.

5.1.4. Response Category Codes

Where character or numeric codes are shown next to each response category, only the character or numeric response code needs to be stored in the database. For example, "1=Yes" will be the response code on the computer screen or hard copy, but the electronic database can store "1=Yes" responses as "1" in the database. For open-ended or text answers (such as name), the full text answer or an encrypted version of it should be stored in the database.

5.1.5. Exit Dates

The HMIS should identify programs that have fixed lengths of enrollment. When a client enters such a program, the HMIS should automatically generate the exit date based on the entry date and the program's fixed length of enrollment. For example, an overnight emergency shelter has a fixed length of stay of one day. This information would be stored with the other program information like FIPS code and program code. When a client enrolls in an overnight emergency shelter, the HMIS will automatically set the client's exit date for the next day.

5.1.6. Maintaining Historical Data

An HMIS should have the ability to record client data from a limitless number of service transactions for longitudinal data analysis and assessment of client outcomes (often referred to as a "transactional" or "relational" database structure). A transactional or relational database organizes data within a set of tables from which data can be accessed or reassembled in many different ways without having to erase historical data or reorganize the database tables. For example, an HMIS may include a table that describes a client's demographic profile with columns for name, SSN, date of birth, gender, and so on. In most cases, the information in the profile table will not change. Another table may describe the client's income status: source of income, amount of income from each source, receipt of non-cash benefits, and so forth. The information in the income status table may change overtime, but all historical data should be preserved. Additional tables may include data from each service encounter by program type (e.g., mental health and/or substance abuse).
5.1.7. **Data Export**

Although a standard environment is not specified, any HMIS application must be capable of exporting any and all data collected into a comma-separated values text file using the following format:

- All fields in a given record are separated by a comma;
- All records within a given text file contain the same fields;
- Blank fields are signified by the comma ending the previous field (or the beginning of the line if the field is the first in the record) followed by a comma indicating the end of the empty field;
- Fields containing text information (as opposed to numeric) will be surrounded by double quotes whenever the field includes blank spaces, commas, or other symbols not part of the standard alphabet;
- The first line of the file shall be a list of the field names included in every record in the file; and
- The list of field names shall be in the same format described above.

5.2. **Continuum of Care Requirements**

5.2.1. **Storage Requirements**

- The CoC must have or designate a central coordinating body that will be responsible for centralized collection and storage of HMIS data.
- HMIS data must be collected to a central location at least once a year from all HMIS users within the CoC.
- HMIS data must be stored at the central location for a minimum of seven years after the date of collection by the central coordinating body or designee of the CoC. The seven-year requirement is the current government standard for health and medical information.

**Environmental Impact**

This notice does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing, rehabilitation, alteration, demolition, or new construction, or establish, revise or provide for standards for construction or construction materials, manufactured housing, or occupancy. Accordingly, under 24 CFR 50.19(c)(l), this notice is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321).


Nelson R. Bregon,
General Deputy Assistant Secretary/or Community Planning and Development.

[FR Doc. 04-17097 Filed 7-29-04; 8:45 am] BILLING CODE 4210-29-P
Appendix F

Sample Privacy Notice
SAMPLE POLICY

DATE: September 1, 2004

SUBJECT: Privacy and Confidentiality

1. To protect the privacy of agency clients
2. To comply with applicable laws and regulations.
3. To insure fair information practices as to:
   a. Openness
   b. Accountability
   c. Collection limitations
   d. Purpose and use limitations
   e. Access and correction
   f. Data Quality
   g. Security

STATEMENT OF POLICY:

1) Compliance Agency privacy practices will comply with all applicable laws governing HMIS client privacy/confidentiality. Applicable standards include, but are not limited to the following.
   b) HIPAA - the Health Insurance Portability Act.
   d) Alameda County-wide Continuum of Care InHOUSE Policy and Procedures manual.
   e) Alameda County-wide Continuum of Care InHOUSE partner agency sharing agreement(s).

**NOTE:** HIPAA statutes are more restrictive than the HMIS FR 4848-N-02 standards and in cases where both apply, HIPAA over-rides the HMIS FR 4848-N-02 standards. In cases where an agency already has a confidentiality policy designed around the HIPAA standards, that policy can be modified to include the HMIS data collection, or can be amended to create one set of standards for clients covered under HIPAA, and a second set of standards for those covered only under HMIS FR 4848-N-02. Agencies should indicate in their Privacy Notice which standards apply to their situation.
2) **Use of Information** PPI (protected personal information that is information which can be used to identify a specific client) can be used only for the following purposes:
   a) To provide or coordinate services to a client.
   b) For functions related to payment or reimbursement for services.
   c) To carry out administrative functions such as legal, audit, personnel planning, oversight and management functions.
   d) For creating de-personalized client identification for unduplicated counting.
   e) Where disclosure is required by law.
   f) To prevent or lessen a serious and imminent threat to the health or safety of an individual or the public.
   g) To report abuse, neglect, or domestic violence as required or allowed by law.
   h) Contractual research where privacy conditions are met (including a written agreement).
   i) To report criminal activity on agency premises.
   j) For law enforcement purposes in response to a properly authorized request for information from a properly authorized source.

**NOTE:** HMIS FR 4848-N-02 standards list items a-d above as allowable reasons for disclosing PPI but make provisions for additional uses to meet individual agency obligations. In some cases these uses (e-j above) have additional conditions, and HMIS FR 4848-N-02 4.1.3 should be consulted if any of these optional items are to be included in an agency's policy. It also states that “except for first party access to information and required disclosures for oversight and compliance auditing, all uses and disclosures are permissive and not mandatory.”

**NOTE:** If a client refuses to release PPI and such information is needed/required in order to provide services, the client’s refusal may necessitate denial of service. Agencies may choose to make provisions for such denial of services in their policy.

3) **Collection and Notification** Information will be collected only by fair and lawful means with the knowledge or consent of the client.
   a) PPI will be collected only for the purposes listed above.
   b) Clients will be made aware that personal information is being collected and recorded and will be asked to express written consent to have their information entered in the InHOUSE system.
   c) A written sign will be posted in locations where PPI is collected. This written notice will read:

   "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 by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

   The collection and use of all personal information is guided by strict standards of confidentiality. Our Privacy Notice is posted. A copy of our Privacy Notice is available to all clients upon request."

   d) This sign will be explained in cases where the client is unable to read and/or understand it.

**NOTE:** Under HMIS FR 4848-N-02, agencies are permitted to require a client to express consent to collect PPI verbally or in writing, however this is optional and not a requirement of the statute.
4) **Data Quality**  PPI data will be accurate, complete, timely, and relevant.
   a) All PPI collected will be relevant to the purposes for which it is to be used.
   b) Identifiers will be removed from data that is not in current use after 7 years (from date of creation or last edit) unless other requirements mandate longer retention.
   c) Data will be entered in a consistent manner by authorized users.
   d) Data will be entered in as close to real-time data entry as possible.
   e) Measures will be developed to monitor data for accuracy and completeness and for the correction of errors.
      i) The agency runs reports and queries monthly to help identify incomplete or inaccurate information.
      ii) The agency monitors the correction of incomplete or inaccurate information.
      iii) By the 15th of the following month all monitoring reports will reflect corrected data.
   f) Data quality is subject to routine audit by System Administrators who have administrative responsibilities for the database.

5) **Privacy Notice, Purpose Specification and Use Limitations**  The purposes for collecting PPI data, as well as it uses and disclosures will be specified and limited.
   a) The purposes, uses, disclosures, policies, and practices relative to PPI data are to be outlined in this agency Privacy Notice.
   b) The agency Privacy Notice will comply with all applicable regulatory and contractual limitations.
   c) The agency Privacy Notice will be made available to agency clients, or their representative, upon request and explained/interpreted as needed.
   d) Reasonable accommodations will be made with regards to the Privacy Notice for persons with disabilities and non-English speaking clients as required by law.
   e) PPI will be used and disclosed only as specified in the Privacy Notice, and only for the purposes specified therein.
   f) Uses and disclosures not specified in the Privacy Notice can be made only with the consent of the client.
   g) The Privacy Notice will be posted on the agency web site.
   h) The Privacy Notice will reviewed and amended as needed.
   i) Amendments to or revisions of the Privacy Notice will address the retroactivity of any changes.
   j) Permanent documentation will be maintained of all Privacy Notice amendments/revisions.
   k) All access to, and editing of PPI data will be tracked by an automated audit trail, and will be monitored for violations use/disclosure limitations.

**NOTE:** Items above are required by HMIS FR 4848-N-02 and/or MSHMIS policy, but agencies can restrict and limit the use of PPI data further by requiring express client consent for various types of uses/disclosures, and/or by putting restriction or limits on various kinds of uses/disclosures.
6) **Record Access and Correction** Provisions will be maintained for the access to and corrections of PPI records.

   a) Clients will be allowed to review their InHOUSE record within 5 working days of a request to do so.

   b) During a client review of their record, an agency staff person must be available to explain any entries the client does not understand.

   c) The client may request to have their record corrected so that information is up-to-date and accurate to ensure fairness in its use.

   d) When a correction is requested by a client, the request will be documented and the staff will make a corrective entry if the request is valid.

   e) A client may be denied access to their personal information for the following reasons:

      i) Information is compiled in reasonable anticipation of litigation or comparable proceedings;

      ii) Information about another individual other than the agency staff would be disclosed,

      iii) Information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the source of the information

      iv) Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

   f) A client may be denied access to their personal information in the case of repeated or harassing requests for access or correction. However, if denied, documentation will be provided regarding the request and reason for denial to the individual and be made a part of the client's record.

   g) A grievance process may be initiated if a client feels that their confidentiality rights have been violated, if access has been denied to their personal records, or if they have been put at personal risk, or harmed.

   h) Any client grievances relative to the InHOUSE system will be processed/resolved according to agency grievance policy.

   i) A copy of any client grievances relative to InHOUSE data or other privacy/ confidentiality issues and agency response are forwarded to CoC staff.

   j) If a client is unsatisfied with the resolution of their grievance at the agency level, the client may request mediation at the system level.
7) **Accountability**  Processes will be maintained to insure that the privacy and confidentiality of client information is protected and staff is properly prepared and accountable to carry out agency policies and procedure that govern the use of PPI data.

a) Grievances may be initiated through the agency grievance process for considering questions or complaints regarding privacy and security policies and practices. All users of the InHOUSE system must sign a Users Agreement that specifies each staff persons’ obligations with regard to protecting the privacy of PPI and indicates that they have received a copy of the agency's Privacy Notice and that they will comply with its guidelines.

b) All users of the InHOUSE system must complete formal privacy training.

c) A process will be maintained to document and verify completion of training requirements.

d) A process will be maintained to monitor and audit compliance with basic privacy requirements including but not limited to auditing clients entered against signed InHOUSE Consent Releases. At minimum, a quarterly Compliance Review will be conducted and documented.

e) A copy of any staff grievances initiated relative to privacy, confidentiality, or InHOUSE system data will be forwarded to CoC Staff.

f) Regular user meetings will be held and issues concerning data security, client confidentiality, and information privacy will be discussed and solutions will be developed.

8) **Sharing of Information**  Client data may be shared with partnering agencies only with client approval

a) All routine data sharing practices with partnering agencies will be documented and governed by the CoC MOU Agreement that defines the agency-determined sharing practice.

b) A completed InHOUSE Client Release of Information (ROI) Form is needed before information may be shared electronically.

i) The InHOUSE release is to inform the client about what is shared and with whom it is shared.

ii) The client accepts or rejects the sharing plan, and selects the extent of sharing.

iii) If the client rejects the sharing plan, staff will click the Security Button, which closes the record.

iv) If the client selects collaborative sharing only, the record is “closed” with designated exceptions.

c) Clients will be informed about and understand the benefits, risks, and available alternatives to sharing their information prior to signing an ROI, and their decision to grant permission shall be voluntary.

d) Clients who choose not to authorize sharing of information cannot be denied services for which they would otherwise be eligible.

e) All Client Authorization for ROI forms related to the InHOUSE system will be placed in a file to be located on premises and will be made available to the CoC Staff for periodic audits.

f) InHOUSE-related Authorization for ROI forms will be retained for a minimum period of three (3) years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.

g) No confidential/restricted information received from the InHOUSE system will be shared with any organization or individual without proper written consent by the client, unless otherwise permitted by applicable regulations or laws.
h) Restricted information, including progress notes and psychotherapy notes about the diagnosis, treatment, or referrals related to a medical health, disabilities, mental health disorder, drug or alcohol use, HIV/AIDS, and any violence-related concerns shall not be shared with other participating Agencies without the clients written, informed consent as documented on the Agency Authorization for Release of Restricted Information Form.

i) Sharing of restricted information is not covered under the general InHOUSE Client ROI.

ii) Sharing of restricted information must also be planned and documented through a fully executed Authorization for Release of Restricted Information Form.

iii) If a field that normally contains non-confidential information discloses confidential information.

(1) The staff completes an Authorization for Release of Restricted Information Form.

(2) If the client refuses to authorize the release, the staff closes the Assessment/Screen by clicking the lock on the screen and removing any exceptions.

i) If a client has previously given permission to share information with multiple agencies, beyond basic identifying information and non-restricted service transactions, and then chooses to revoke that permission with regard to one or more of these agencies, the affected agency/agencies will be contacted accordingly, and those portions of the record impacted by the revocation, too will be locked from further sharing.

j) All client ROI forms will include an expiration date, and once a Client ROI expires, any new information entered will be closed to sharing unless a new Client ROI is signed by the client and entered in the InHOUSE system.

9) System Security  System security provisions will apply to all systems where PPI is stored: agency's networks, desktops, laptops, mini-computers, mainframes and servers.

a) Password Access:

i) Only individuals who have completed Privacy and System Training may be given access to the InHOUSE system through User IDs and Passwords,

ii) Temporary default passwords will be changed on first use.

iii) Access to PPI requires a user name and password at least 8 characters long and using at least one number and one letter.

iv) Passwords will not use or include the users name or the vendor name, and will not consist entirely of any word found in the common dictionary or any of the above words spelled backwards.

v) User Name and password may not be stored or displayed in any publicly accessible location.

vi) Passwords must be changed routinely.

vii) Users must not be able to log onto more than one workstation or location at a time.

viii) Individuals with User IDs and Passwords will not give or share assigned User IDs and Passwords to access the InHOUSE system with any other person, organization, governmental entity, business.

b) Virus Protection and Firewalls:

i) Commercial anti-virus protection software will maintained to protect all agency network systems and workstations from virus attack.

ii) Virus protection will include automated scanning of files as they are accessed by users.

iii) Virus Definitions will be updated regularly.

iv) All workstations will be protected by a firewall either through a workstation firewall or a server firewall.
c) Physical Access to Systems where InHOUSE Data is Stored
   i) Computers stationed in public places must be secured when workstations are not in use and staff is not present.
   ii) After a short period of time a pass word protected screen saver will be activated during time that the system is temporarily not in use.
   iii) For extended absence from a workstation, staff must log off the computer.

d) Stored Data Security and Disposal:
   i) All InHOUSE data downloaded onto a data storage medium must be maintained and stored in a secure location, not accessible to non-licensed users of the InHOUSE system.
   ii) Data containing PPI will not be downloaded to any remote access site at any time for any reason, nor transmitted outside the physical agency by any means whatsoever.
   iii) Data stored on a portable medium will be secured when not in use and will never be taken off site at any time for any reason.
   iv) Data downloaded for purposes of statistical analysis will exclude PPI whenever possible.
   v) InHOUSE data downloaded onto a data storage medium must be disposed of by reformattting as opposed to erasing or deleting. This includes hard drives.
   vi) A data storage medium will be reformattted a second time before the medium is reused or disposed of.

e) System Monitoring
   i) User access to the InHOUSE Live Web Site will be monitored using the computer access logs located on each computer's explorer "history" button, or via a central server report.

f) Hard Copy Security:
   i) Any paper or other hard copy containing PPI that is either generated by or for InHOUSE including, but not limited to report, data entry forms and signed consent forms will be secured.
   ii) Agency staff will supervise at all time hard copy with identifying information generated by or for the InHOUSE system when the hard copy is in a public area. If the staff leaves the area, the hard copy must be secured in areas not accessible by the public.
   iii) All written information pertaining to the user name and password must not be stored or displayed in any public accessible location.

g) Authorized Location Access:
   i) Access to the InHOUSE system is allowed only from authorized agency locations.

10) Agency HMIS/InHOUSE Grievance Policy (Add details of agency HMIS grievance policy in this section. Refer to HUD Final Data Standards pp. 45930-45931, Section 4.2.5 Access and Correction and Section 4.2.6 Accountability. Your policy may be the same as for other programs. If so, simply include present policy.)

NOTE: Various important aspects of system security are the contracted responsibility of Bowman Systems and are therefore not covered in agency policy. These involve procedures and protections that take place at the site of the central server and include data backup, disaster recovery, data encryption, binary storage requirements, physical storage security, public access controls, location authentication, etc.
PROCEDURES:

NOTE: Procedures and roles relative to this policy should be defined in a procedure section. These may vary significantly from agency to agency but may include the following:

1. Participating agencies may integrate InHOUSE into the agency's existing Privacy Notice. If the agency does not have an existing Privacy Notice agencies may adopt the HMIS Privacy Notice example or use it as a model. The Privacy Notice must reflect the agency's privacy policy.

2. Copies of the Participation Agreement (MOU and the User Agreement/Code of Ethics may be attachments to your Policy. In addition to customizing the sample policy provided above, the agency should describe:
   a. Who will have what Access Levels on InHOUSE ServicePoint.
   b. How access to the room(s) where the InHOUSE system is being used will be controlled.
   c. Procedures for acquiring client consent.
      i. The Agency's Privacy Notice should be posted.
      ii. How the Privacy Notice will be explained.
      iii. How and when the InHOUSE Consent Release of Information will be introduced to clients.
      iv. A copy of the second Release required for sharing restricted information
Appendix G

Client Release of Information Authorization
What is InHOUSE and Why Should I Use It?

InHOUSE is a computer program to help

- Save you time by not filling out a new application at each agency using InHOUSE
- Make it easier for you to get the services you need
- Identify other services or programs for which you may be eligible
- Make sure these programs continue receiving funding to keep them open

The InHOUSE system is used by many agencies throughout the county that provide services to homeless and low-income persons. The participating agencies are listed on the back of this page.

When you request or receive services from PROGRAM NAME, information we collect about your household is entered into InHOUSE. If you give permission, the basic Intake (Application) Information is shared with all participating agencies so you do not need to completely fill out a new one every time you go somewhere else. Having your Intake in InHOUSE also helps us refer you to other services you might be eligible for.

Our funders have always required us to give them anonymous information about the characteristics of people we serve and how many services we provided. Keeping your information in the InHOUSE system helps us pool your anonymous data with others for these reports. This helps us do our job more efficiently and helps to keep funding and improve the services and programs for you and other homeless and low-income households. NO IDENTIFYING INFORMATION ABOUT YOU (name, date of birth, or social security number) WILL BE USED FOR THIS REPORTING.

What information is collected about me?

- Basic Intake Information: my name, social security number, age, date of birth, gender, race, ethnicity, languages spoken, veteran status, if I have a disability, employment information, household income information, household relationships, and if I have health coverage. The Intake information will ONLY be shared with the participating agencies listed on the back.

- NO medical, HIV/AIDS, mental health, substance use, details about a disability, or any violence-related information will be shared outside of this agency unless you agree by signing a separate consent form.

- Depending on your situation, you may also be asked for some or all of the following that will not be shared: family status, housing history, address, disability information, work skills, legal information, medical information, services needed and provided, and outcomes of services provided.

If you choose not to have your information shared in the InHOUSE system, this agency will keep your information in secure electronic records in the InHOUSE system that are not shared.
The agencies listed below utilize the InHOUSE system. All or some of the programs in these agencies participate in the InHOUSE system.

<table>
<thead>
<tr>
<th>A Safe Place</th>
<th>East Oakland Community Project</th>
<th>Phase III</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing Associates</td>
<td>Eden I&amp;R</td>
<td>Phoenix Programs, Inc.</td>
</tr>
<tr>
<td>Alameda County HCD shelter + Care Programs</td>
<td>Emergency Shelter Program FESCO</td>
<td>Resources for Community Development</td>
</tr>
<tr>
<td>RISE Project</td>
<td>Fred Finch Youth Center</td>
<td>Rubicon Programs</td>
</tr>
<tr>
<td>Alameda Point Collaborative</td>
<td>Goodwill Industries, Inc.</td>
<td>Salvation Army</td>
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<tr>
<td>Allied Housing</td>
<td>Health Care for the Homeless</td>
<td>SAVE</td>
</tr>
<tr>
<td>Ark of Refuge</td>
<td>Homeless Families Program HOPE Van</td>
<td>Second Chance</td>
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<tr>
<td>Berkeley Food &amp; Housing Project</td>
<td>Jubilee Restoration</td>
<td>Shepherd’s Gate</td>
</tr>
<tr>
<td>Berkeley Interfaith Youth Project</td>
<td>LifeLong Medical Care</td>
<td>St. Mary’s Center</td>
</tr>
<tr>
<td>Bonita House, Inc. BOSS</td>
<td>Lutheran Social Services</td>
<td>Travelers Aid Society</td>
</tr>
<tr>
<td>Building Futures with Women and Children</td>
<td>Matilda Cleveland</td>
<td>Tri-City Health Center</td>
</tr>
<tr>
<td>Casa Vincentia</td>
<td>Oakland Army Base Workforce Collaborative</td>
<td>Tri-City Homeless Coalition</td>
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<tr>
<td>Chaplaincy to the Homeless</td>
<td>Operation Dignity</td>
<td>Tri-Valley Haven for Women</td>
</tr>
<tr>
<td>City of Berkeley Shelter + Care Programs</td>
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<td>Women’s Daytime Drop-in Center</td>
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<tr>
<td>City of Oakland Department of Human Services</td>
<td></td>
<td>Women on the Way</td>
</tr>
<tr>
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<td>Xanthos</td>
</tr>
<tr>
<td></td>
<td></td>
<td>24 Hour Parent Teacher Center</td>
</tr>
</tbody>
</table>
How Will Sharing My Information With Other Agencies Be Helpful to Me?

- It will be easier for me to get the services I need
- It will save me time by not filling out a new application at each agency using InHOUSE,
- It will help to identify other services or programs for which I may be eligible,
- It will help me get referred to other programs I may need.

Your participation in the InHOUSE system is important to our ability to provide you with the best possible services. It helps us to improve the quality of services available for homeless and low-income individuals and families, and to get an accurate count of people who need housing and other services.

Print Client Name: ________________________________

___ (Initial Here)  I have received and reviewed the “What is the InHOUSE System” information sheet.

By signing below, I agree that my Intake information may be shared with InHOUSE participant agencies (listed on the back of this form) for myself and (if applicable) my minor children.

I understand that if I give information about medical, HIV/AIDS, mental health, substance use, details about a disability, or any violence-related information, none of this information will be shared outside this agency unless I provide specific written consent on a separate form.

I know that the agencies in the system (listed on the back of this form) must follow strict privacy laws. The agencies in the system may change from time to time. I understand that I may cancel this authorization at any time by written request, and I understand the cancellation will not be retroactive. I understand that this release is valid for three (3) years.

______________________________  __________________________
Signature of Client or Guardian  Date  Agency Representative  Date

There may be a reason why sharing any information beyond this agency may put you or a family member at risk. If this applies to you, please discuss this with a case manager before signing this form.

You do not have to allow sharing to receive services.

☐ A Special Data Entry Instructions form has been stapled to the Intake Form.
<table>
<thead>
<tr>
<th>A Safe Place</th>
<th>East Oakland Community Project</th>
<th>Phase III</th>
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<td>Affordable Housing Associates</td>
<td>Eden I&amp;R</td>
<td>Phoenix Programs, Inc.</td>
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<td>Alameda County HCD</td>
<td>Emergency Shelter Program</td>
<td>Resources for Community Development</td>
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<td>Shelter + Care Programs</td>
<td>FESCO</td>
<td>Rubicon Programs</td>
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<td>Fred Finch Youth Center</td>
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<td>St. Mary’s Center</td>
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<td>Berkeley Interfaith Youth Project</td>
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<td>LifeLong Medical Care</td>
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<td>BOSS</td>
<td>Lutheran Social Services</td>
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<td>Tri-Valley Haven for Women</td>
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<td>Casa Vincentia</td>
<td>Oakland Army Base Workforce Collaborative</td>
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<td>Chaplaincy to the Homeless</td>
<td>Operation Dignity</td>
<td>Women on the Way</td>
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<td>City of Berkeley</td>
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<tr>
<td>Shelter + Care Programs</td>
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<td>24 Hour Parent Teacher Center</td>
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The agencies listed below utilize the InHOUSE system. All or some of the programs in these agencies participate in the InHOUSE system.
Appendix H

HUD HMIS Required Data Elements List
<table>
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<tr>
<th>Data Field</th>
<th>Pick List/Required Response Cat.</th>
<th>When Collected</th>
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<td>2.1 First Name</td>
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<td>2.3 Date of Birth</td>
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<td>1 = Full SSN reported 2 = Partial SSN reported 3 = Don't know or don't have SSN</td>
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<td>6 = Released</td>
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<td>8 = Don't Know</td>
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<td></td>
</tr>
<tr>
<td>17 = Other</td>
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</tr>
</tbody>
</table>

- 16 = Place not meant for habitation (e.g., a vehicle, an abandoned building)
- 15 = Foster care home or foster care group home
- 14 = Hotel or model room without emergency shelter voucher
- 13 = Sharing of living in a friend's room, apartment, or house
- 12 = Sharing of living in a family member's room, apartment, or house
- 11 = Apartment or house that you own
- 10 = Apartment or house that you rent
- 9 = Jail/prison or juvenile detention facility
- 8 = Hospital (non-psycho) or SRO
- 7 = Subsistence house meant for homeless persons (such as SHP, S+P)

<table>
<thead>
<tr>
<th>Type of Residence</th>
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<td>1 = Emergency shelter (including a youth shelter, or hotel, motel, or</td>
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### Other Information

<table>
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<th>InHouse Universal Data Fields and Rick Lists</th>
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<td>2.4 = Race</td>
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<td>2.6 = Veteran Status</td>
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<td>2.7 = Disability Condition</td>
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- 5 = White
- 4 = Male Hawaiian or Other Pacific Islander
- 3 = Black or African American
- 2 = Asian
- 1 = American Indian or Alaska Native

<table>
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- 1 = Transgender male to female (female)
- 2 = Transgender male to male (male)
- 3 = Transgender female to male (male)
- 4 = Transgender female to female (female)
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<th>Program Entry Date</th>
<th>Zip Code</th>
<th>Facility Code</th>
<th>Locally Determined</th>
<th>HUD Code</th>
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**Program-Specific Data Elements Required For APR:**

- InHouse Universal Data Fields and Pick Lists
- Alabama County-Wide Homeless Continuum of Care Council
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<th>Service Description</th>
<th>Date of Service</th>
<th>Accomplished by</th>
<th>Expected to be of Long Continued</th>
<th>Substance Abuse Problem</th>
<th>Mental Health Problem</th>
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<td>Health Care</td>
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<td>HIV/AIDS Related Services</td>
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<td>Mental Health Counseling</td>
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<td>12</td>
<td>Substance Abuse Services</td>
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<td>13</td>
<td>Employment</td>
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<td>14</td>
<td>Case Management</td>
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<td>15</td>
<td>Day Care</td>
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**Notes:**
- (All) indicates that each service is applicable.
- 0000/00/00 is the date of service.
- [3.3] indicates that the service is when experience occurred.
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<tr>
<th>Program Exit</th>
<th>All</th>
<th>Reason for Leaving</th>
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<tr>
<td></td>
<td></td>
<td>6 = Reused 9 = Reused</td>
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<td></td>
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<td>8 = Don't know 6 = Other Housing subsidy</td>
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<td>5 = HOME Program 1 = HOME Program</td>
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<td></td>
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<td>4 = S+C 2 = Section 8</td>
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<td>3 = Prenatal 1 = Prenatal</td>
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<td>0 = None</td>
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<td></td>
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<td>3.10 = Subsidy Type</td>
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<thead>
<tr>
<th>Program Exit</th>
<th>All</th>
<th>Destination</th>
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<tr>
<td></td>
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<td>16 = Homeless Shelter (including an emergency shelter, hotel, motel, or congregate living facility)</td>
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<td>15 = Clinic (mental health)</td>
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<td></td>
<td>14 = Clinic (physical health)</td>
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<tr>
<td></td>
<td></td>
<td>13 = Substance abuse treatment facility or detox center</td>
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<td></td>
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<td>12 = Substance abuse treatment facility or detox center</td>
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<td></td>
<td></td>
<td>11 = Hospital (non-psychiatric)</td>
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<td></td>
<td></td>
<td>10 = Emergency housing for formerly homeless persons (such as SVP, S+C)</td>
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<td>9 = Permanent housing for formerly homeless persons (including homeless youth)</td>
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<td>8 = Transitional housing for homeless persons (including homeless youth)</td>
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<tr>
<td></td>
<td></td>
<td>7 = Personal enrichment</td>
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<tr>
<td></td>
<td></td>
<td>6 = Other</td>
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<tr>
<td></td>
<td></td>
<td>5 = Outreach</td>
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<td></td>
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<td>4 = Prenatal enrichment</td>
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InhouseCounty-Wide Homeless Continuum of Care Council
<table>
<thead>
<tr>
<th>Assess/Exit</th>
<th>Adults Unaccompanied Youth</th>
<th>Adults</th>
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$^*$ House Count and Homeless Continuum of Care Council

$^*$ Adult Unaccompanied Youth
| 1 = No
| 2 = Physically impaired
| 3 = Need assistance
| 4 = Need supervision
| 5 = Other
| 6 = Dis Amp
| 7 = Bed conduct
| 8 = Medical
| 9 = General
| 10 = Other

| 1 = None
| 2 = Residency Requirement
| 3 = Availability of School Records
| 4 = Birth certificates
| 5 = Legal guardianship requirements
| 6 = Transportation
| 7 = Lack of available preschool programs
| 8 = Immunization requirements
| 9 = Physical examination records
| 10 = Other

| 1 = Yes
| 2 = Public school
| 3 = Parochial or other private school
| 4 = Home school

| 1 = Yes
| 2 = Child's current enrollment status
| 3 = Child's name or child's school
| 4 = Child's age

| 1 = Yes
| 2 = Child's current enrollment status
| 3 = Child's current enrollment status
| 4 = Child's age

| 1 = Yes
| 2 = Child's current enrollment status
| 3 = Child's current enrollment status
| 4 = Child's age
Appendix I

Glossary

**Aggregate Data**
Data collected across the system which does NOT contain PPI.

**APRs**
Annual Progress Reports

**CHO**
Covered Homeless Organization. Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.

**CoC**
Continuum of Care.

**HIPAA Covered Entity**
An agency/jurisdiction that is required to comply with all HIPAA (Health Insurance Portability and Accountability Act of 1996) standards as defined by federal regulations.

**HMIS**
Homeless Management Information Systems. A computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance services and stores that data in an electronic format.

**InHOUSE**
The name InHOUSE is an acronym for Information about Homelessness, Outcomes, and Service Engagement.
MOU
Memorandum of Understanding. A signed agreement between agencies/jurisdictions and the Alameda County-wide Continuum of Care Council specifying the terms of participating in the InHOUSE system.

PPI
Protected Personal Identifiers. Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual. Data fields determined by HUD to be PPI include: first name, middle name, last name, suffix of name, other first name (alias), other middle name, other last name, other name suffix, social security number, date of birth, zip code of last permanent address, program entry date, program exit date, the client PIN number in the software application, the city code of the service provider, the facility code of the service provider, the CoC code, and the program type code.

Privacy Agreement
An agreement signed by anyone collecting data for entry into INHOUSE or working with data generated by the InHOUSE system that contains PPI, pledging to uphold all confidentiality and privacy standards set forth in the Agreement.

Privacy Notice
A document published by each agency/jurisdiction that describes its policies and practices for the processing of Protected Personal Identifiers (PPI).

ROI
Release of Information.

User Agreement
An agreement signed by all licensed users of the InHOUSE system specifying the terms of being a licensed user.
MEMORANDUM OF UNDERSTANDING
BETWEEN
ALAMEDA COUNTY HUD CONTINUUM OF CARE
COMMITTEE, (ACTING AS THE CONTINUUM OF CARE
BOARD) AND
ALAMEDA COUNTY DEPARTMENT OF HOUSING AND
COMMUNITY DEVELOPMENT, (ACTING AS THE
HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS) LEAD

I. Introduction and Purpose

The Alameda County Continuum of Care (the “CoC”) is the governing body organized to carry out the responsibilities required under HUD’s Homeless Emergency Assistance and Rapid Transition to Housing Continuum of Care Program Interim Final Rule at 24 CFR Part 578.7(b) (the “Interim Rule”), including designating a Homeless Management Information System (HMIS) lead to operate HMIS. In addition, the CoC is responsible for making decisions about HMIS management and administration as required under 24 CFR Part 580, a separate rule establishing regulations for HMIS issued by HUD as part of the implementation of the HEARTH Act of 2009. The CoC is responsible for ensuring that the HMIS is operated in accordance with the provisions of the new regulations and other applicable laws (24 CFR Part 580.5).

The Alameda CoC is part of EveryOne Home, a collective impact effort to end homelessness. It is composed of representatives of organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons. The HUD Continuum of Care Committee (the “CoC Board”) functions as the Alameda County CoC Board, required by the Interim Rule to act on behalf of the membership to ensure the CoC responsibilities are fulfilled.

The CoC relies upon data collected in the HMIS to understand the extent and nature of homelessness, and how well the system is working to address it, and to report system and project performance to HUD. If implemented well, the HMIS should also support the operation of the housing and service system, including the CoC’s coordinated entry. Under HUD mandates, the CoC must designate a single information system as the official HMIS software for the geographic area, and an HMIS Lead, an entity designated to operate the HMIS (24 CFR Part 580.7). While the CoC must review, revise and approve all policies and plans the HMIS Lead is required to develop, the HMIS Lead must develop written policies and procedures for all Covered Homeless Organizations (CHOs), serve as the applicant to HUD for any HMIS grants, and monitor compliance by all CHO’s of the CoC (24 CFR Part 580.9)

Because managing the HMIS is a shared responsibility between the CoC and the HMIS Lead, expectations around each entity’s role must be agreed to and clearly documented, along with any role envisioned for the CoC Board and CoC Lead agency in its relationship to the HMIS.

This MOU describes in detail the roles, responsibilities, and accountability that guide the collaboration for the Alameda County Homeless Management Information System (HMIS) among
the Parties described below, consistent with the Alameda County Continuum of Care/EveryOne Home Governance Charter approved in October of 2017 and 24 CFR Parts 578 and 580.

II. Parties to this Memorandum of Understanding:

1. The Continuum of Care Board ("CoC Board"): HUD Continuum of Care Committee

The Alameda County CoC has designated the HUD Continuum of Care Committee (HUD CoC) to function as the CoC Board. The CoC Board is required by the Interim Rule, and acts on behalf of the membership to ensure the CoC responsibilities are fulfilled. The CoC is responsible for "ensuring that the HMIS for the Continuum of Care is operated in accordance with the provisions of the new regulations and other applicable laws." (24 CFR Part 580.5).

The CoC Committee, acting as the CoC Board, may designate an organization to act on its behalf and/or provide staff support. That entity, identified as the CoC Lead, may undertake the activities of the CoC specified in this MOU.

2. The Homeless Management Information System Lead ("HMIS Lead"): Alameda County Department of Housing and Community Development (HCD)

The Alameda County CoC has designated the Alameda County Department of Housing and Community Development Department as the HMIS Lead to operate the HMIS as required under 24 CFR Part 580.7, for assuring the CoC is compliant with all applicable HUD rules and regulations. HCD administers the HMIS funds provided by the CoC funding as well as the local match.

III. Roles and Responsibilities of Parties

A. Roles and responsibilities of the HUD Continuum of Care Committee (CoC Board) with respect to HMIS:

1. Act on behalf of the membership to ensure HMIS is administered in compliance with HUD CoC regulations.

2. Designate a single Homeless Management Information System (HMIS) for the geographical area (24 CFR Part 578.7(b)(1) and 24 CFR Part 580.5

3. "Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead." (24 CFR Part 578.7(b)(2).

4. "Review, revise and approve the policies and plans required by this part and by any notices issued from time to time (24 CFR Part 580.7)," including but not limited to a privacy plan, security plan, and data quality plan for the HMIS (24 CFR Part 578.7(b)(3).

5. "Ensure consistent participation of recipients and subrecipients in the HMIS." (24 CFR Part 578.7(b)(4).

6. Analyze and approve the annual review of the HMIS system's performance and functionality, using HMIS work-plan to measure progress.

B. Roles and Responsibilities of Alameda County Housing and Community Development as HMIS Lead Agency (HMIS Lead):

1. As per 24 CFR 580.9(a), the HMIS lead must ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include
establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if needed, to ensure that the HMIS is compliant with the requirements of this part.

2. Develop written HMIS policies and procedures in accordance with § 580.31 for all Covered Homeless Organizations (CHOs) (24 CFR Part 580.9).

3. Execute a written HMIS Participation Agreement with each CHO, which includes the obligations and authority of the HMIS Lead and CHO (24 CFR Part 580.9), the requirements of the security plan with which the CHO must abide (24 CFR Parts 580.31), the requirements of the privacy policy with which the CHO must abide, the sanctions for violating the HMIS Participation Agreement (e.g., imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the CHO will process Protected Identifying Information consistent with the agreement. The HMIS Participation Agreement may address other activities to meet local needs. (24 CFR Part 580.9).

4. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum of Care’s geographic area (24 CFR Part 580.9), as directed by the Continuum, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities.

5. Monitor and enforce compliance by all CHO’s with the requirements of this part and report on compliance to the Continuum of Care and HUD.

6. The HMIS Lead must submit a security plan (see § 580.35), a data quality plan (see § 580.37), and a privacy policy (see § 580.31(g)) to the Continuum of Care for approval within [the date that is 6 months after the effective date of the final rule to be inserted at final rule stage] and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the Continuum of Care and CHO. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Continuum of Care.

7. Provide staffing for HMIS.

8. Provide standard and customized reports, and technical support, as applicable and requested by participating agencies in accordance with the mutually adopted customization policy.

9. Develop and implement HMIS-related training for end users, including regular Privacy and Security training and software training. Develop written procedures and job aides for users.

10. Review data quality monthly and take necessary actions per mutually adopted data quality assurance policy to maintain input of high-quality data from all HMIS-utilizing agencies. Report to the COC Committee on data quality and quality assurance activities on a quarterly basis.

11. Solicit HMIS user feedback through using a variety of mechanisms, such as on-line forums, surveys and user groups, such as the HMIS User Group. The User Group will work with the HMIS Lead to: 1) Provide recommendations on use of software and software enhancements; 2) Trouble-shoot frequent data quality errors; 3) Recommend modifications to HMIS staff created reports; and 4) improve coordinated entry workflow.

12. To the extent possible, ensure that CoC projects using an alternate data collection system (such as Domestic Violence providers) are compliant with maintaining a “comparable database” and collecting the necessary HMIS data elements.
13. Generate reports on HMIS data and additional data available to present results to HUD CoC Committee for gap analysis. Configure and maintain the HMIS to be an effective performance management system that is capable of measuring progress in meeting the system and project performance measures established through the EveryOne Home’s Results Based Accountability (RBA) Committee.

14. Develop an effective communication plan to reach all HMIS participants to communicate changes to policy and procedures.

15. Develop an annual work plan for the HMIS System for review and final approval by HUD CoC. The annual work plan will be presented along with the HMIS budget proposal to the Board of Supervisors, including costs and funding sources.

C. Joint Responsibilities of the HUD CoC Committee (CoC Board) and Alameda County Housing and Community Development (HMIS Lead)

1. Participate in the HUD Continuum of Care Committee, and its HMIS-related sub-committees, including the HMIS Oversight Subcommittee.

2. Support the implementation of, and compliance with local HMIS policies such as, data quality and security, participation, and customization.

3. Collaborate to design and modify the configuration of HMIS projects, such that it meets program reporting and system analysis needs.

4. Participate in the EveryOne Home Results Based Accountability (RBA) Committee in using the HMIS to develop system performance measures, data dashboards, and other analytical tools that follow HUD HMIS standards and meet community needs.

5. Analyze system and programmatic data for trends, costs, performance, compliance, and progress on the Alameda CoC Plan to End Homelessness.

6. Work collaboratively with other committees in analyzing annual reports from HMIS, including the Longitudinal Analysis report (formerly AHAR), System Performance Measures, PIT Count, and HIC chart.

7. Establish the HMIS Oversight Subcommittee, that will act as a liaison between the HUD CoC Committee and the HMIS Lead Agency, with the following responsibilities:
   a. Review data quality reports and recommend a quality improvement program to the HUD CoC.
   b. Ensure compliance with federal requirements.
   c. Support and protect the rights and privacy of service users.
   d. Recommend to the HUD CoC a policy and set of procedures that will guide decisions about customization including establishing: A) a process through which a Contributing HMIS Organization (CHO) may request that project configuration, custom data collection fields, and/or assessments be built into the HMIS; B) the criteria upon which those requests are evaluated; and C) guidance for CHO’s to appropriately manage requests for custom data collection fields and assessments.
   e. Collaborate with the HMIS lead on all HMIS policies the HMIS Lead is required to develop, including Privacy, Security, and Data Quality Plans as required by federal

MOU Page 4
regulation.

8. Review data quality reports and take appropriate action to ensure accountability and improved performance of CHOs and system per approved policies.

9. Conduct an annual review of the HMIS system's performance and functionality, using HMIS work-plan to measure progress. Criteria will be discussed with HMIS Lead.

10. Revisit license users' policies and collaborate when additional funding is needed to expand programs and users.

IV. DURATION AND RENEWAL

1. Except as provided in the TERMINATION section, the duration of the MOU shall be for an initial five-year term from June 6, 2018, through June 6, 2023.

2. This agreement may be renewed by written agreement of both parties.

V. AMENDMENTS/NOTICES
The MOU may be amended in writing by the parties and is in effect upon signature of all parties. Notices shall be mailed, emailed or delivered to:

1. Chair of the HUD CoC Committee
2. Director of Alameda County Department of Housing and Community Development

VI. TERMINATION
Any party may terminate this MOU at a date prior to the renewal date specified in the MOU by giving 120 days written notice to the other party. The termination shall be effective on the date specified in the notice of termination.

In addition, if any of the Parties to this Memorandum of Understanding shall fail to fulfill in a timely and proper manner its obligations under this agreement, or if the Parties shall violate any of the covenants, agreements, or stipulations of this agreement, any of the Parties shall thereupon have the right to terminate this agreement by giving written notice of such termination and specifying the effective date thereof, which shall be at least 120 days before the effective date of such termination.

Signatures:

[Signature]
Chair, HUD CoC Committee, on behalf of the Alameda County Continuum of Care (CoC Board

[Signature]
Director, Alameda County of Housing and Community Development (HMIS Lead)

[Date]

[Date]
EveryOne Home  
Alameda County Continuum of Care (CoC) Council  
Prioritization for Permanent Supportive Housing Opportunities

The Alameda County Continuum of Care Council, in accordance with guidance from the U.S. Housing and Urban Development (HUD) Department Office of Community Planning Notice (CPD) CPD-14-012, maintains the following priority preference groups for access to permanent support housing (PSH) opportunities within Alameda County. All households eligible for a given PSH opportunity can apply for PSH or a waiting list for PSH when applications are being received. All CoC-funded PSH opportunities will maintain marketing and tenant selection policies and procedures that have explicit preferences and prioritization for households that meet the criteria established below. The CoC will work toward establishing and maintaining up-to-date copies of the policies and procedures for access to each CoC-funded PSH opportunity. In addition, the CoC will promote the utilization of this prioritization among non-CoC funded PSH and document the use of this approach among other PSH in the County.

The funding sources and target groups among PSH opportunities within Alameda County vary significantly. The priority group described below must also meet the specific requirements of a given PSH opportunity to be considered. For example, a housing unit set aside for persons with HIV/AIDS could not be offered to someone without verification of their HIV/AIDS status. Preference for this unit would be given to someone with verified HIV/AIDS that also met the priority group criteria below.

If more than one household is being considered for a PSH housing opportunity AND both households meet the CoC priority group standards for Alameda County, THEN the household that first applied for the opportunity will be selected first. In other words, the date of application will be used to differentiate among households that meet the preference criteria. If other preference criteria are also used for a given housing opportunity, e.g., city preference, these preferences may be used prior to using the date of application to determine the household next offered the opportunity. The preferences and details of selection for a given PSH program will be identified in their marketing and tenant selection policies and procedures.

Alameda County PSH shall give preference to households that meet the following general criteria:

1) The household meets the HUD CoC definition for “chronic homelessness”  
   AND

2) The household is in at least one of the high service need groups defined below.
HUD Chronic Homelessness Definition

(1) A homeless individual or head of household with a disability that meets the HUD definition of a disability who
   (a) lives in a place not meant for human habitation, a safe haven, or in an emergency shelter;
   AND
   (b) has been homeless and living in one of these places continuously for at least 12 months OR on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living in one of the aforementioned places.

Stays in institutional care facilities for fewer than 90 days will not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility. Institutional care facilities include jails, substance abuse or mental health treatment facilities, hospitals, or other similar facilities.

A family with an adult head of household (or if there is not adult in the family, a minor head of household) who meets all of the above criteria, including a family whose composition has fluctuated while the head of household has been homeless are also considered chronically homeless.
EveryOne Home
Alameda County Continuum of Care (CoC) Council
Prioritization for Permanent Supportive Housing Opportunities

High Service Need Group

To be considered part of the PSH high priority group individuals must be in at least one of the groups below. No extra preferences are given for individuals in more than one group.

#1: In a 12 month period (verified one or more of the following via referrals from designated agencies or administrative data)….
   a) Cherry Hill Detox or Sobering Station admissions (3 or more)
   b) Hospitalization (medical or psychiatric) admissions (3 or more)
   c) Incarcerations (3 or more)
   d) EMS transports (5 or more)
   e) Law enforcement contacts (5 or more)

#2: High Health Risk (one or more of the following verified by a clinician and/or clinical records)
   a) 60 years of age or older AND one or more chronic health conditions (heart disease, emphysema/COPD, diabetes, asthma, cancer, hepatitis C)
   b) Kidney Disease/End Stage Renal Disease or Dialysis
   c) History of Frostbite, Hypothermia, or Immersion Foot
   d) Liver Disease/Cirrhosis, or End-Stage Liver Disease
   e) HIV+/AIDS
   f) Arrhythmia
   g) Seizure Disorder
   h) Schizophrenia or Schizoaffective Disorder
   i) Tri-Morbidity
      a) Mental health, learning, developmental, or other cognitive disability AND
      b) Substance use disorder AND
      c) Chronic health condition (heart disease, emphysema/COPD, diabetes, asthma, cancer, hepatitis C)

#3: VI-SPDAT assessment completed and score = 8 or more (self-report)

Elaine de Coligny, Executive Director
Everyone Home
BERKELEY HOUSING AUTHORITY
ADMINISTRATIVE PLAN

For Section 8 Programs

2018-19

1936 University Avenue, Suite 150
Berkeley, CA 94704
c. Attempt to utilize the assistance to rent a unit in Berkeley for 24 months before becoming eligible for portability

Candidates for this program must have a written referral from the property manager and/or case manager.

Targeted Funding [24 CFR 982.204(e)]

HUD may award BHA funding for a specified category of families on the waiting list. BHA must use this funding only to assist the families within the specified category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

**BHA Policy**

For any specified category of families for which HUD may award funding to BHA, applicants will be selected in the following order:

1. Any manner set forth by HUD in funding award
2. If not set forth by HUD funding award, in the order of first come, first served.

HUD designated assistance or awarded funding to BHA in response to an application from BHA:

The waiting list is always open to an otherwise eligible homeless applicant referred to BHA for assistance by the research project/administration, up to the maximum number of vouchers approved for the project.

To the extent BHA is awarded funding (vouchers) under a HUD Notice of Funding Availability (NOFA) or other means, for any specific or broader-based category, BHA will:

- Review the current S8 Waiting list for a pending application and grant assistance in accordance with its position on the waiting list; or
- Reopen the waiting list to accept an eligible household, not presently on the waiting list.

**Regular HCV Funding**

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

**4-III.C. SELECTION METHOD**

BHA must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that BHA will use [24 CFR 982.202(d)].

**Local Preferences [24 CFR 982.207; HCV p. 4-16]**

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated
plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

**BHA Policy**

- Resident families that at the time of selection from the waiting list, reside in the City of Berkeley, or include a member who works, or has been hired to work in the jurisdiction. Use of this preference will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family. (100 points)
- Veteran Preference (as required by State law). Granted to households with one or more active member(s) of the military, or a veteran discharged or released under conditions other than dishonorable, or a surviving spouse (as defined by the Department of Veteran Affairs) (50 points)
- Households with a project “Move-Up” referral (50 points)
- Family Unification/Emancipated Youth – with a Family Unification Plan from the governing jurisdiction (20 points)
- Elderly (62 or older), Disabled or Family (any 2- or more person household), status based on head of household or (10 points)
- Date and time of application (tie breaker).

**Section 8, Single Room Occupancy, Moderate Rehabilitation Program (Mod Rehab)**

The Single Room Occupancy, Moderate Rehabilitation program “Interest Lists” are managed by The Hub, operated by Berkeley Food and Housing Project and referred to Home Stretch, the Alameda County Health Care Services agency’s program. (See Chapter 18 for details.)

**Income Targeting Requirement [24 CFR 982.201(b)(2)]**

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during BHA’s fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, BHA may skip non-ELI families on the waiting list in order to select an ELI family. This means that 75% of BHA’s admissions must be at or below 30% of AMI; so 25% of BHA’s admissions may be at 31 – 50% AMI.

Low income families admitted to the program that are “continuously assisted” under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

**BHA Policy**

BHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families (up to 30% AMI) will be selected ahead of other eligible low-income (50% AMI) families on an as-needed basis to ensure the income
Administrative Plan

Updated and Approved
April 2017
Chapter 4 – Applications, Site-based Waiting Lists and Tenant Selection (Excerpt from ACOP - 2017 – page 4-13)

Local Preferences [24 CFR 960.206]

OHA is permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits OHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with OHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

OHA will use the following preferences to select families from the waiting list:

- A Veterans Preference (as required by state law);
- A Residency Preference (for persons living or working in Oakland)
- A Family Preference for applicant families with two or more persons, a single person applicant that is 62 years of age or older, or a single person applicant with a disability.
- A family preference for applicant families that are homeless at admission based on the McKinney Vento Act definition.

Applicants to the public housing conventional program, within the above preferences, will be selected from the waiting list in the order of their assigned lottery number and according to OHA preference(s) for which they qualify. Among applicants with the same preference, families will be selected according to a random selection process.

Chapter 4 – Applications, Site-based Waiting Lists and Tenant Selection (Excerpt from Administrative Plan - 2017 – page 4-13 – 4-14)

Local Preferences [24 CFR 982.207; HCV p. 4-16]

The PHA is permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA’s plan, the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

OHA Policy

OHA will use the following preferences to select families from the MTW Section 8 tenant-based voucher program waiting list:
• **A Residency preference** (Applicants who live or work in the City of Oakland at the time of the application interview and/or applicants that lived or worked in the City of Oakland at the time of submitting their initial application and can verify their previous residency/employment at the applicant interview, qualify for this preference).

• **A Family preference** (Applicant families with two or more persons, or a single person applicant that is 62 years of age or older, or a single person applicant with a disability, qualify for this preference).

• **A Veteran** and active members of the military preference.

• **A DVP/DHAP assistance preference** (Applicant families currently receiving Disaster Voucher Program (DVP) or Disaster Housing Assistance Program (DHAP) assistance from OHA and where DVP/DHAP program funding has expired, qualify for this preference (New admission for DVP/DHAP conversions is to limited 50 new admission families per calendar year).

• **A Family Unification Program (FUP) conversion preference.** OHA may expand the Family Unification Program (FUP) by converting certain families who were assisted by a targeted FUP voucher, to the Housing Choice Voucher (HCV) program. The families selected for this conversion must have successfully reunified, maintained housing independent of services and demonstrated stability in their assisted tenancy for a consecutive 3-year period. Emancipated foster youths admitted to the FUP program will also be evaluated at the end of their 18-month term and upon demonstrated stability in their FUP tenancy, may also be offered the opportunity for continued assistance under the Housing Choice Voucher program. The conversion of FUP assisted families to the Housing Choice Voucher program is limited to 15 or an amount to be determined at the discretion of the Executive Director or his designee families per calendar year.

Pending HUD approval of OHA participation in the FUP/FSS Demonstration program, FUP program participants who agree to sign an FSS Contract of Participation (Form HUD-52650) will maintain their housing assistance for a period not exceeding the length of the FSS Contract of Participation, including extensions.

If OHA participates in the Family Unification Program and Family Self-Sufficiency Demonstration per PIH Notice 2016-01, all provisions of the notice will be implemented and be in effect until amended, superseded or rescinded.

• **A Shelter-Plus Care conversion preference.** OHA may expand its Shelter-Plus Care program by converting certain families who are assisted by the Shelter-Plus Care program, operated in partnership with the County of Alameda. An OHA administered Shelter-Plus Care family who has maintained housing independent of services and who has demonstrated stability in their assisted tenancy for a consecutive 3-year period may be converted to the Housing Choice Voucher (HCV) program. The conversion of Shelter-Plus Care assisted families to the Housing Choice Voucher program is limited to 20 families per calendar year.
• **A Local Housing Assistance Program (LHAP) conversion preference.** A family assisted by the OHA administered Local Housing Assistance Program (LHAP is authorized under MTW and adopted by the OHA Board of Commissioners, December 7, 2009), may be converted to the Housing Choice Voucher (HCV) program subject to funding availability and applicant eligibility for admission to the HCV program.

• **A Section 8 Homeownership Program preference.** Applicant families who meet all Family Eligibility criteria for participation in the Section 8 Homeownership program (Section 15-VII.B.), and who are a participant in good standing in any OHA administered program, qualify for this preference. (New admission to the Section 8 Homeownership program for families who are participants from other OHA programs (see Section 15-VII.C.) is limited 15 new admission families per calendar year). The families will be selected based on the order (date and time) in which their completed application is received by OHA under all available positions are filled.

• **A Homeless preference.** Applicant families who meet the McKinney-Vento Act definition of homelessness qualify for this preference.
Housing Authority of the County of Alameda (HACA)
Housing Choice Voucher Program

Current as of: March 14, 2018
4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16; CA Health & Safety Code Section 34322.2(a) and (b)]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

HACA Policy

Section 8 Housing Choice Voucher Program (HCV)

HACA applies the following preferences and priority:

- **Shortfall Terminated (250 points):** Participants of HACA’s HCV program that were terminated due to insufficient funding.

- **Shortfall Recalled (130 points):** Applicants on HACA’s HCV waiting list who received a voucher but had not yet utilized the voucher when it was recalled and were returned to the waiting list due to insufficient funding.

- **CHOICES or FACT Graduates (40 points):** Participants of the CHOICES or FACT programs sponsored by the Alameda County Behavioral Health Care Services Agency (BHCS), who, as determined by BHCS, are in good standing; are nearing the end of their participation; will soon graduate from the program; and, have been referred to HACA by BHCS. Applicants may not receive both the CHOICES or FACT Graduates preference and the MHSA Graduates preference.

- **Displaced-HACA (50 points):** Displaced family—HACA-owned or HACA-managed housing as set forth in the Glossary.

- **Displaced-Other (10 points):** Displaced family as set forth in the Glossary.

- **MHSA Graduates (40 points):** Participants of the State of California Mental Health Services Act (MHSA) shelter and services program sponsored by the Alameda County Behavioral Health Care Services Agency (BHCS), who, as determined by BHCS, are in good standing; are nearing the end of their participation; will soon graduate from the program; and, have been referred to HACA by BHCS.

- **Homeless (20 points):** Individual applicants or applicant families that verifiably lack housing, including one whose primary residence during the night is a supervised public or private facility that provides temporary living accommodations; an individual who is a resident in transitional housing; or an individual who has as a primary residence a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings as
confirmed by the applicant’s local homeless service organization or consortia of organizations.

- Veteran (1 point): Priority will be given to veterans or servicepersons as set forth in the Glossary within each preference category.

HACA will select applicants from its waiting list for HCV assistance in the following order:

1. Applicants for Targeted Funding as set forth in Section 4-III.B above
2. Shortfall Terminated families
3. Shortfall Recalled families
4. CHOICES, FACT or MHSA Program Graduates
5. Prior to assisting further applicants on the waiting list, HACA will assist the following families, in the following order:
   a. Current HCV participants whose moves have been denied due to insufficient funding.
   b. Currently housed Project-Based Voucher holders who have priority to receive the next available opportunity for continued tenant-based assistance as outlined in Section 17VII.C.
6. HACA will select remaining applicants on the waiting list.

Note #1: HACA will limit the number of applicants that may qualify for the Displaced-Other and Homeless preferences such that no more than five applicants from these preferences will be selected in any calendar month.

Note #2: For CHOICES, FACT, or MHSA Program Graduates:
   a. HACA will conduct a lottery of MHSA, CHOICES and FACT Program graduates referred by BHCS and assist applicants in order of ascending lottery “tiebreaker” number (that is, applicants with a lower lottery “tiebreaker” number are selected before applicants with a higher one) except that veterans or servicepersons as set forth in the Glossary will be assisted before applicants who are not veterans or servicepersons.
   b. HACA will limit the number of applicants that may qualify for this preference such that no more than 75 applicants of the combined MHSA, CHOICES and FACT graduates from this preference will be selected annually.

Preference points are aggregated to produce the total preference points for each applicant. Applicants with the same total preference points will then be sorted by the method in which they were selected to be placed on the waiting list (i.e., date and time of application or order of random selection).

Section 8 Project-Based Voucher Program (PBV)

HACA selectively applies the following preferences and priorities as set forth in the individual waiting lists listed below:
- **In-Place Family (400 points):** A PBV In-Place Family living in a PBV contract unit as set forth in Section 17-V1.B.

- **Displaced-Emeryville (2 points):** Qualified households who have been displaced as a result of the City of Emeryville’s or City of Emeryville Redevelopment Agency’s public projects or the City’s code enforcement activities.

- **Displaced-HACA (50 points):** *Displaced family—HACA-owned or HACA-managed housing* as set forth in the Glossary.

- **Displaced-Other (10 points):** *Displaced family* as set forth in the Glossary.

- **Homeless (20 points):** Individual applicants or applicant families that verifiably lack housing, including one whose primary residence during the night is a supervised public or private facility that provides temporary living accommodations; an individual who is a resident in transitional housing; or an individual who has as a primary residence a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings as confirmed by the applicant’s local homeless service organization or consortia of organizations.

- **CCT Participant (20 points):** Families that include at least one household member who is a person with a disability and a MediCal recipient who has resided in an institution for at least 90 days and is transitioning into the community as confirmed by the Non-Elderly Disabled (NED) program Lead Organization.

- **Voluntary Supportive Services (8 points):** *Voluntary Supportive Services* families as set forth in the Glossary.

- **Extremely Low-Income (30 points):** Families whose annual income does not exceed the higher of, by family size, 1) the federal poverty level applicable to the family; or 2) 30% of area median income (AMI), as determined by HUD.

- **Veteran (1 point):** Priority will be given to veterans or servicepersons as set forth in the Glossary within each preference category.

Preference points are aggregated to produce the total preference points for each applicant. Applicants with the same total preference points will then be sorted by the method in which they were selected to be placed on the waiting list (i.e., date and time of application or order of random selection).

Except for applicants referred by an owner participating in HACA’s PBV Program in instances when HACA failed to provide sufficient eligible families from the waiting list to fill a vacancy within 30 days of the owner’s notification to HACA of the vacancy, HACA will select as follows:

**WAITING LISTS**

**Carlow Court**

At least one household member must be age 62 or older to qualify.

- **50% AMI Units**
- **Displaced-Other**
Veteran
30% AMI Units
Displaced-Other
Extremely Low-Income
Veteran

Wexford Way
50% AMI Units
Displaced-Other
Veteran
30% AMI Units
Displaced-Other
Extremely Low-Income
Veteran

Rotary Bridgeway East
At least one household member must be eligible for Voluntary Supportive Services offered by the project.

Displaced-Other
Voluntary Supportive Services
Homeless
Veteran

Lorenzo Creek
At least one household member must be eligible for Voluntary Supportive Services offered by the project.

Displaced-Other
Voluntary Supportive Services
Homeless
Veteran

Magnolia Terrace
At least one household member must be a person with a disability in order to qualify.
Note: This project's funding for supportive services is targeted to serve persons with developmental disabilities.

Displaced-Emeryville
Displaced-Other
Voluntary Supportive Services
**Main Street Village**

At least one household member must be eligible for Voluntary Supportive Services offered by the project and at least one household member must be homeless as defined in Preferences (above) for the Section 8 PBV program in order to qualify.

**Homeless Units**
- Displaced-Other
- Homeless
- Voluntary Supportive Services
- Veteran

**Homeless and Disabled Units**
In addition to the other requirements above for this project, at least one household member must be a person with a disability.
- Displaced-Other
- Homeless
- Voluntary Supportive Services
- Veteran

**Maple Square**
- Displaced-Other
- Veteran

**Mayten Manor**
At least one household member must be age 62 or older or a person with a disability in order to qualify.
- Displaced-Other
- Veteran

**Peppertree Village**
- Displaced-Other
- Veteran

**Station Center**
- Displaced-Other
- Veteran

**Third Street Apartments**
At least one household member must be homeless as defined in Preferences (above) for the Section 8 PBV program in order to qualify.
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<th>Displaced-Other</th>
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**Union City Units (58 Scattered)**
- Displaced-HACA
- Displaced-Other
- Veteran

**Nidus Court**
At least one household member must be age 62 or older to qualify.
- Displaced-HACA
- Displaced-Other
- Veteran

**Dyer Street**
At least one household member must be age 62 or older to qualify.
- Displaced-HACA
- Displaced-Other
- Veteran

**Howard Collins Bridgeway**
- Displaced-Other
- Veteran

**Eden Commons**
At least one household member must be a person with a disability, as well as, a MediCal recipient who has resided in an institution for at least 90 days and is transitioning into the community.
- Displaced-Other
- CCT Participant
- Veteran

**Flanders House**
At least one household member must be a person with a disability, as well as, a MediCal recipient who has resided in an institution for at least 90 days and is transitioning into the community.
- Displaced-Other
- CCT Participant
- Veteran
2018 HUD CoC NOFA is out!

The HUD CoC Notice of Funding Availability (NOFA) for the 2018 Continuum of Care (CoC) Program Competition was released today by the US Department of Housing and Urban Development (HUD) and is now open. The competition will close Tuesday, September 18, 2018. Click here to review the Notice and find out more guidance from HUD. We encourage you to review this year’s NOFA, including its resources link FY 2018 Continuum of Care (CoC) Program Competition What’s New, Changes, and Highlights. Please share the Notice with anyone who may be interested in applying this year.

EveryOne Home, as Alameda County’s Continuum of Care Lead, will facilitate the local funding application process, conduct the rating and ranking of applicant projects, and write and submit the Consolidated Application to HUD in partnership with Alameda County Housing and Community Development (HCD).

Within the next weeks, we will be sending an email to current and prospective grantees specific information related to this NOFA, NOFA Timelines and next steps – as we continue to move forward with this year’s Competition. Make sure you are on our email list by registering here.

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2018 Renewal’s Project Evaluation Preliminary Scores Package Memo

Thank you for working with us on completing the first stage of the 2018 NOFA Local Renewal and New Projects Review Process. Please see the memo below:

2018 NOFA Renewal’s Project Evaluation Preliminary Scores and Next Steps

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2018 NOFA Local Review Process Renewals’ Project Evaluation Package

Please download the Project Evaluation Instructions and Form below. Review the Instructions located on pages 1-9 of the EveryOne Home Instructions and Evaluation Form carefully. The Cover Sheet for each Project has been emailed to the specific NOFA grantee.
Dear Applicant,

Thank you for submitting your application to the 2018 NOFA round! After a thorough review by our NOFA Committee, we are releasing the final results of the Local competition. You may find the list attached, along with additional scoring details for your project(s). If you are a lead-grantee, please forward this information to your sub-grantees. If you have any other questions please feel free to contact us at: info@everyonehome.org.

Best,
EveryOne Home

4 attachments

- Appendix A 2018 HUD CoC NOFA Appeals Process Final 720180719.pdf
  125K
- Alameda County HCD.docx
  61K
- Com. Announcement Memo CoC NOFA 2018 Final.pdf
  138K
- 2018 R&R List 20180830.pdf
  153K
Below please find the scoring for the project above the table. If the project’s Total Points do not match the project’s Score, one or more criteria did not apply and therefore the score was pro-rated out of total possible points less than 100.

Agency: Alameda County HCD
Project: CES

*This project elected to keep the score awarded when previously submitting as a new/proposed project. If you would like to receive a copy of the point analysis from your original submission, feel free to contact us at: info@everyonehome.org

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<tr>
<th>Primary Activity Type</th>
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Total Score: 69.6  
Percentage: 69.6%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - HOPE Housing

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Total Score: 83
Percentage: 90.22%

Note: The Award Amount for this grant was reduced by $97,000.00. **The New Award Amount is $390,069.00.** Grant reduced by last year’s underspending. Left 1/12th (8%) of grant for cushion. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Agency: Alameda County HCD

### Project: Alameda County Shelter Plus Care - TRA

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**Total Score:** 88.00  
**Percentage:** 88.17%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - HOST

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Total Score: 83
Percentage: 82.83%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - Lorenzo Creek

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<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
<th>Outcome B</th>
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<th>Outcome D</th>
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Total Score: 91
Percentage: 90.83%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda County Shelter Plus Care - PRA

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Total Score: 86.60
Percentage: 87%
This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD
Project: Alameda County Shelter Plus Care - SRA

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Total Score: 87
Percentage: 86.67%

Note: The Award Amount for this grant was reduced by $342,413.00. The New Award Amount is $1,314,975.00. Consistently underspent by 26-29% over last 3 grant years. Reduction amount is lowest underspent of 3 years. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
**Agency:** Alameda County HCD  
**Project:** Alameda County Shelter Plus Care – SRO

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**Total Score:** 88  
**Percentage:** 87.67%

**Note:** The Award Amount for this grant was reduced by $167,651.00. The **New Award Amount is $627,313.00**. Site-based Project with general pattern of underspending grant by 30% over last 3 grant years. Reduction amount is lowest unspent of 3 years. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Alameda Point Permanent

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<th>Primary Activity Type</th>
<th>Target Populations</th>
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Total Score: 93  
Percentage: 92.50%

This project's scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Agency: Alameda County HCD

### Project: APC – Multi Service Center

<table>
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<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
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Total Score: 83  
Percentage: 83%

This project's scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
### Project: Banyan House

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**Total Score:** 80  
**Percentage:** 80%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: Homes for Wellness

*This project elected to keep the score awarded when previously submitting as a new/proposed project. If you would like to receive a copy of the point analysis from your original submission, feel free to contact us at: info@everyonehome.org

<table>
<thead>
<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
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Total Score: 83.29
Percentage: 83.29%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD

Project: InHouse (HMIS)

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Total Score: 82
Percentage: 91.11%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD
Project: Lorenzo Creek SHP

| Primary Activity Type | Target Populations | Housing 1st Doc | Outcome A | Outcome B | Outcome C | Outcome D | Outcomes Total | Resubmission Scores | Outcomes Final | Rprts & Invoicing | Capacity & Utilization | Client Eligibility | HMIS Data Quality | Fiscal Management | Housing 1st Nar | Spending | Cost Effectiveness | QA | Improve Sys Perf | Capacity to Serve | Consolidation |
|-----------------------|--------------------|-----------------|-----------|-----------|-----------|-----------|----------------|---------------------|-----------------|-------------------|----------------------|------------------|------------------|----------------|-----------------|---------|------------------|------------------|---------------|
|                       |                    |                 | 5         | 9         | 4.50      | 10.00     | 7.00          | 7.00                | 8.00            | 32.00             | 0.00                 | 32.00           | 10               | 4              | 5.00            | 2       | 4.00             | 0.67             | 0              |
|                       |                    |                 |           |           |           | 4          |               |                     | 32.00           |                   |                      |                  |                  |                |                 |          | Total Score: 89  |                    |               |
|                       |                    |                 |           |           |           |            |               |                     |                 |                  |                      |                  |                  |                |                 |          | Percentage: 88.50 |                    |               |

Note: The Award Amount for this grant was reduced by $8,419.00. The New Award Amount is $77,369.00. Consistently underspent grant. Site-based Project with fluctuation in needs for services. Reduction amount is lowest unspent of 3 years. If you have any questions, please feel free to contact us at: info@everyonehome.org

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD
Project: Reciprocal Integrated Services for Empowerment (RISE) Project

<table>
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<th>Outcomes Total</th>
<th>Resubmission Scores</th>
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Total Score: 91
Percentage: 91.17%

This project’s scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Agency: Alameda County HCD
Project: Southern Alameda County Housing/Jobs Linkages Program

<table>
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<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
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<th>Outcome A</th>
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Total Points: 79
Percentage: 85.87%

Note: The Award Amount for this grant was reduced by $140,000.00. **The New Award Amount is $1,359,466.00.** Grant reduced by last year’s underspending. Left 1/12th (8%) of grant for cushion. If you have any questions, please feel free to contact us at: info@everyonehome.org
Agency: Alameda County HCD
Project: Tri-City FESCO Bridgeway Apartments

<table>
<thead>
<tr>
<th>Primary Activity Type</th>
<th>Target Populations</th>
<th>Housing 1st Doc</th>
<th>Outcome A</th>
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Total Points: 88
Percentage: 88.33%
### Alameda County HCD

#### Project: Welcome Home

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<th>Outcome B</th>
<th>Outcome C</th>
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<th>Outcomes Final</th>
<th>Rpts &amp; Invoicing</th>
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Total Points: 89

Percentage: 88.50%
Below please find the scoring for the project above the table. If the project's Total Points do not match the project's Score, one or more criteria did not apply and therefore the score was pro-rated out of total possible points less than 100.

Agency: Alameda County HCD
Project: Spirit of Hope 1

*This project elected to keep the score awarded when previously submitting as a new/proposed project. If you would like to receive a copy of the point analysis from your original submission, feel free to contact us at: info@everyonehome.org

<table>
<thead>
<tr>
<th>Primary Activity Type</th>
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<th>Housing 1st Doc</th>
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Total Score: 86
Percentage: 89.93

This project's scores were sent to the lead agency only. Please distribute to any sub-grantees or partners.
Hello,

Don't miss out on the first presentation on the new proposed 2018 NOFA year-round process tomorrow! Please RSVP if you plan on attending.

Please join us for a brief update and analysis on the 2017 Alameda County NOFA results released on January 11th, and a discussion on EveryOne Home's proposal to hold year-round NOFA activities beginning in late March.

Let us know you're coming! Please use the link below to RSVP for this debrief and discussion.

**2017 HUD CoC NOFA Debrief Session**
Tuesday, February 27th 2018
1:00PM - 3:30PM
Oakland City Hall
1 Frank H. Ogawa Plaza,
Hearing Room 3

https://mail.google.com/mail/u/0/?ui=2&ik=8241a0e24b&javel=K8SpjNhSmRc.en.&cbl=gmail_fe_180909.14_p3&view=pt&msg=161d3d417c07a088&q...
Oakland, CA 94612

**RSVP**

Although HUD has not yet released the CoC's overall scores in the national competition, we will review the 2017 funding awards. We are also excited to introduce a proposal for a newly revamped NOFA Process and Timeline for 2018, based on prior community feedback and our October 2017 NOFA Survey.

Thank you,
EveryOne Home

Visit the HUD CoC Page

101 Callan Ave., Suite 230,
San Leandro, CA 94577
Phone: (510) 473 8643
info@everyonehome.org

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HUD CoC NOFA

2018 HUD CoC NOFA Materials

81318 – Given the Strategic Direction provided by the HUD CoC Committee to encourage applications for the 2018 NOFA DV Bonus projects and the unanticipated challenges and complexity in applying for these new projects, the NOFA Committee has determined to extend the deadline for all new DV Bonus project applications through August 21st at noon. The August 17th deadline for renewal and all other new projects (not DV Bonus) has not changed.

EveryOne has new 2018 HUD CoC NOFA Guides: Continuation for the Local Competition on Monday, October 16th to allow time to complete NOFA timelines and Local Committee’s instructions for renewal and new projects. For more information on the NOFA process, please contact your NOFA representative.

2018 NOFA Application
- 2017 NOFA Application
- 2018 NOFA Application

2018 NOFA Application Process
- 2018 NOFA Application Process
- 2018 NOFA Application Process

2018 APPLICATIONS

- New Application
- Renewal Application
- NHIS Application

Appendix A 2018 HUD CoC NOFA Application Process
Appendix B 2018 Housing First Checklist
Appendix C 2018 Calculating Performance and Region Populations - Updated 3/7
2018 HUD CoC NOFA Competition Bidders’ Conference

Oakland City Hall
1 Frank H Ogawa Plaza, Hearing Room 3
July 20th, 2018
1:30 – 5:00pm
Agenda

1. Welcome
2. 2018 Guiding Principles
3. Local Process and Key Dates
4. 2017 NOFA CoC Scores Analysis and Strategic Direction from HUD CoC Committee
5. 2018 NOFA: Key Changes
6. Overview of Local Applications
   A. Renewals
   B. New Projects
7. Q & A Session
### 2018 Guiding Principles

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1.</td>
<td>Maximize resources available to the community local needs</td>
</tr>
<tr>
<td>2.</td>
<td>Package submitted will align with HUD priorities in order to meet local needs</td>
</tr>
<tr>
<td>3.</td>
<td>Prioritize ensuring existing residential capacity and housing stability is maintained system-wide</td>
</tr>
<tr>
<td>4.</td>
<td>Keep the renewal process as simple as possible</td>
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<tr>
<td>5.</td>
<td>Continue to emphasize project performance and the submission of projects that will meet HUD's thresholds</td>
</tr>
<tr>
<td>6.</td>
<td>Support individual projects seeking to reallocate or reclassify where relevant</td>
</tr>
<tr>
<td>7.</td>
<td>Facilitate a clear, fair and transparent local process</td>
</tr>
<tr>
<td>8.</td>
<td>Advocate locally and nationally to protect and fund projects that add value to our Continuum of Care and response to homelessness</td>
</tr>
</tbody>
</table>
Local Process and Key Dates

- February 27th: 2017 NOFA Debrief Session held – Launching of 2018 NOFA Process
- March 23th: Renewals' Project Evaluation (PE) Package released
- April 30th: Preliminary results of PE released
- June 1st: Technical Assistance and Project Monitoring Sessions started
- June 20th - FY 2018 CoC Program Competition Opens: Notice of Funding Availability (NOFA) was released
Local Process and Key Dates

- **July 17th** - HUD CoC and NOFA Committee held the joint session. HUD CoC Committee proposes Strategic Direction to respond to 2018 NOFA

- **July 20th** - Bidders’ Conference: Committee finalized local process and application and releases it to applicants

- **July 20th** through Aug 2nd – Frequently Asks Questions (FAQ) period: Staff and NOFA Committee will address applicant questions. Answers to all questions will be published on the EveryOne Home website July 31st and August 3rd.
Local Process and Key Dates

- **August 17th by 5pm**: Local Applications due to info@everyonehome.org

- **TBD**: E-Snaps Application due by Close of Business Day (CBD)

- **August 31st**: Preliminary scores and Rating & Ranking release

- **Sept 5 – Sept 7**: Appeals period

- **September 14th**: Final Rating & Ranking List release

- **September 18th**: Consolidated Application due to HUD by 5:00 PST
How our CoC scored in 2017

<table>
<thead>
<tr>
<th>Category</th>
<th>Total Possible Points</th>
<th>Our Points Awarded</th>
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</thead>
<tbody>
<tr>
<td>CoC Structure and Governance</td>
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<td>45.75</td>
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<tr>
<td>Data Collection and Quality</td>
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<td>24</td>
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<tr>
<td>Performance and Strategic Planning</td>
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<td>65.5</td>
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<tr>
<td>Cross-Cutting Policies</td>
<td>22</td>
<td>22</td>
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<tr>
<td><strong>Totals</strong></td>
<td><strong>200</strong></td>
<td><strong>157.25</strong></td>
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</tbody>
</table>
How are CoC scored in 2017

- We scored 2 points below our 2016 score, and just slightly better than we predicted for 2017.

- Our 2017 score was 9.75 points above the national median (147.5), but 2.5 points below the weighted median. Given that our Annual Renewal Demand (ARD) is one of the highest in the country, it appears that higher ARD Continuums do not benefit from score weighting.

- Our 2017 funding award of $35,327,971 = equivalent to our ARD and included additional $1,484,942 in FMR adjustments. One renewal at the bottom of Tier 2 and proposed bonus projects were not funded.

- Given last two years scoring, it is uncertain whether we will receive bonus projects funding
Strategic Direction from HUD CoC Committee

The HUD CoC Committee considered several factors and sources in the development of the 2018 Strategic Direction given to the HUD NOFA sub-committee, including:

- Reviewing NOFA 2018 changes and opportunities, our 2017 score and HUD’s feedback
- Reviewing community input from 2017 NOFA and soliciting further input at an open meeting on 2/27/18
Strategic Direction

- Without increasing local investment and aligning strategies to impact system performance, our Continuum is at serious risk of losing HUD funds in future NOFA rounds.
- As HUD continues to increase its ranking of Continuum’s based on system performance, we must advocate the urgency of marshalling resources and strategies to improve aspects of system performance that are beyond the scope of HUD CoC funded individual projects.
Example: First Time Homeless
System Performance Measures 2015-2017
Strategic Direction

- For example, this 162% increase in first time homelessness between FY 2015 and FY 2017 is a prevention issue, and there are not prevention projects in the HUD CoC package.
- From HMIS 2017 data, we also know that for every 2 people becoming homeless for the first time only 1 is finding permanent housing.
- The call from the HUD CoC to our Leadership Board, elected officials and community at large is that in order to decrease first time homelessness, we must advocate for the expansion of our system capacity for prevention assistance.
Strategic Direction

- **Recommendation 1:** Strategic and purposeful Reallocation of Projects to better meet the needs of the Continuum of Care:
  - For this year and future years, the HUD CoC Committee strongly recommends strategic reallocation of Projects with **unspent funds** and existing Projects seeking to **convert to other project types** (such as TH projects seeking to reallocate to Joint TH and PH-RRH projects) that strengthens our system and application package and is aligned with our guiding principles.
Strategic Direction

- **Recommendation 1: Strategic and purposeful Reallocation of Projects to better meet the needs of the Continuum of Care:**
  - **Continue to utilize strategies already in use:**
    - Maintaining a minimum scoring threshold (Projects must score more than 60 points in the Local Application to be included in the package; and
    - Invite voluntary reallocation
Strategic Direction

- Recommendation 2: Incentivize the consolidation of existing renewal projects.
  - 2018 NOFA allows two or more projects eligible for renewal to consolidate and apply for funding to be combined into a single renewal project (once awarded).
  - Our CoC package includes 50 projects+ (many are similar or identical projects held by the same grantee and difficult to manage separately).
  - Grantees can benefit from this opportunity, as consolidation was a very difficult process as outlined by HUD in the past.
Strategic Direction

• Recommendation 3: **Invite applications for reallocation and bonus projects** for reallocation of renewal projects and **expansion** of existing CoC-funded and non CoC-funded projects
  
  ▪ Limit the invitation of new projects under Reallocation and Bonus funds to **existing renewal projects** seeking conversion to other project types and **expansion** of existing CoC-funded and non CoC-funded projects (PSH, RRH, Joint TH-RRH, and HMIS, and/or to target DV survivors)

  ▪ This strategy is intended to achieve HUD's expressed desire, to see projects fully occupied and expending funds as quickly as possible.
Strategic Direction

- Recommendation 3: Solicit applications for the new 2018 Domestic Violence Bonus (DV Bonus)
  - HUD added up to $50 mi in DV Bonus to provide housing and services to survivors of domestic violence, dating violence, sexual assault, stalking and trafficking (DV Survivors)
  - Up to 3 new projects may be included in the package (one for each: Rapid Rehousing, Joint TH and PH-RRH and Support Services Only – Coordinated Entry)
  - Our CoC welcomes this opportunity as DV Bonus projects will strengthen our ability to better serve DV survivors and our NOFA response to HUD, which is prioritizing DV survivors.
NOFA 2018 Available Funds

- Tier 1 is 94 Percent of the CoC’s ARD amount
- Permanent Housing Bonus: 6% of CoC’s ARD
  - Total Annual Renewal Demand (ARD) = $34,329,783
  - Tier 1 Amount (94% ARD) = $32,269,996
  - ARD in Tier 2 (6%) = $2,059,787
  - Bonus = $2,059,787
  - Total Tier 2 (6% + Bonus) = $4,119,574
  - DV Bonus (new) = $1,062,887
  - CoC Planning Grant = $1,029,893
  - 2018 Total Submission allowed = $37,452,457

(Does not include CoC Planning Grant)
NOFA 2018: Key Changes

- **System Performance and CoC Coordination**
  - The most relevant change in this year’s NOFA is an even stronger emphasis on performance criteria
  - As highlighted in the Chart below, there are 5 points increase in the CoC Coordination and Engagement section, 7 points increase in System Performance’s evaluation, and a decrease of 12 points for the Performance and Strategic Planning section.
  - 2 New questions for CoC Coordination and Engagement: CE implementation and Addressing Racial disparities
# NOFA 2018: Key Changes

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<tr>
<td>Project Ranking, Review, &amp; Capacity</td>
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<tr>
<td>Performance and Strategic Planning</td>
<td>60</td>
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NOFA 2018 Key Changes

Consolidation

- Eligible renewal projects will have the ability to consolidate two or more projects (up to four) in one project application – without having to wait for a grant amendment to be executed to consolidate two or more grants. (NOFA, Page 9).
- Applicant must consult first with HUD Field Office on whether the Project is eligible for consolidation.
- HUD will not permit a transitional housing and a PH project to consolidated to form a Joint TH and PH-RRH or a transition grant to be consolidated with any other project (Page 9)
NOFA 2018: Key Changes

- Transition Grants
  - New project applicants can now transition an existing renewal project (e.g. TH) to another component (e.g. PH-RRH) through a Transition grant. Must use the reallocation process to convert the existing renewal to one of the new eligible components (NOFA, Page 8)
  - Up to 50% of each transition grant may be used for costs of eligible activities of the program component originally funded
  - Project will have one year to fully transition from the original component to the new component and must have the consent of the Continuum of Care (CoC)
NOFA 2018: Key Changes

- Expansion of existing projects
  - Renewal projects may again expand current operations by submitting a new project application to add units, beds, persons served, and services provided to existing participants, or in the case of HMIS, increase the current HMIS grant activities.
  - Projects can expand CoC and non CoC funded programs funded by other than CoC funds, except to replace state or local funds.
NOFA 2018: Key Changes

- **Domestic Violence Bonus**
  - 1-year funding request for the following project types:
    - PH-RRH projects that follow a Housing First approach
    - Joint TH and PH-RRH that follow a Housing First approach
    - SSO-CE projects to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV survivors (NOFA Page 8)
  - Only one project application for each project type allowed
  - Existing renewal project not dedicated to DV survivors may expand and dedicate additional units, beds, persons served, or services for this population.
  - Although they are locally scored and ranked along renewals and bonus, HUD requires DV Bonus Projects listed on the new Projects CoC Priority Listing with a unique rank number (NOFA, Page 12)
Overview of Local Applications (Renewals and New Projects)
Local Applications: The Basics

- Renewals and New Projects Local Application packages due to EveryOne Home on **August 17th, 2018 by 5 pm.** Send submissions in PDF form to info@everyonehome.org

- Preliminary Local Rating and Ranking list will be announced on **August 31st, 2018**

- Final Rating and Ranking list due to appeals (if needed) will be published on **September 14th** at EveryOne Home website

- Complete Collaborative Application posted on EveryOne Home website due **September 16th**
Local Applications

- As of 2018, EOH will be returning to two separate applications for renewing and new projects:
  - **Renewal Local Application** (to complete Stage 3 of 2018 NOFA Process)
    - Much simpler application with two narratives for Housing First and Quality Assurance
    - Two objective criteria scoring:
      - Cost Effectiveness
      - Spending
    - One new question for projects with households with children and youth to describe how they meet children educational needs
    - Ability to provide additional, updated or recent documentation with the possibility of increasing Project Evaluation Preliminary scores
    - Incentive for Projects seeking and eligible for Consolidation
Local Applications

• As of 2018, EOH will be returning to two separate applications for renewing and new projects:
  ▪ **New Projects Local Application for:**
    • CoC funded projects seeking to **reallocate** existing projects into a new component – May also apply for a Transition Grant
    • CoC funded and non-CoC funded projects seeking to **expand operations:**
      • New PSH DedicatedPLUS or PSH with 100% CH
      • New RRH (individuals and families, including unaccompanied youth)
      • New Joint TH and PH-RRH component
      • New HMIS
      • **CoC funded projects can expand to serve DV survivors**
    • CoC and non-CoC funded projects **applying for DV Bonus:**
      • New RRH
      • New Joint TH and PH-RRH
      • New SSO-Coordinated Entry to implement policies, procedures and practices to better serve the needs of DV survivors
Threshold Requirement for 2018 Local Process

- All applicants who receive HUD CoC funding are required to participate in Coordinated Entry (CE)
  - Applicants will be required to certify in application they are aware of this expectation and are already complying or will comply with CE
  - Projects must notify CE of all openings and fill those openings with participants referred from CE
- All PSH projects must have executed a Memorandum of Understanding with Home Stretch
Renewals Local Application Scoring

- Renewal Project Local Applications will be scored on a 21-point scale in five categories:
  - Narrative for Housing First (scored by NOFA Committee) = Up to 4 points
  - Spending = Up to 5 points
  - Cost Effectiveness = Up to 2 points
  - Narrative for Quality Assurance (scored by NOFA Committee) = Up to 7 points

**NEW:** Consolidation of existing renewals will receive 3 points (must attach written notice from HUD as “eligible” for consolidation).
Renewals Local Application Scoring

- Scores to be awarded to renewal projects during the Local Application (up to 21 points possible) are cumulative with preliminary scores awarded to the Project Evaluation Package (up to 79 points) for a total of 100 points possible.
Renewals Local Application Scoring

- Renewal Projects may also increase Project Evaluation Preliminary scores under the following four Sections:
  - Documentation for Housing First = Up to 6 points
  - Documentation for Client Eligibility = Up to 5 points
  - Performance Outcomes = Up to 32 points
  - Fiscal Management = Up to 2 points
- Projects seeking to increase Project Evaluation Preliminary scores must attach required documentation described on Application
New Projects Application Summary

- New Projects creation
  - Through Reallocation
    - May apply for Transition grant to support eliminating existing project to create new component (from TH to RRH)
  - Through Expansion of existing operations
    - CoC funded – including targeting DV survivors not currently targeted
    - Non CoC funded for PSH, RRH and Joint component (needs qualification and experience)
    - HMIS
- DV Bonus
  - CoC and Non CoC funded for RRH, Joint and SSO-CE
New Projects Application Scoring

- New Project applications will be scored on a 100-point scale in five categories:
  - Primary Activity Type = Up to 5 points
  - How Project Addresses Local and HUD Priorities = Up to 25 points
    - **Added:** Whether Project will improve system performance
  - Outcome Performance = Up to 32 points
  - Grant Management = Up to 20 points
  - Organizational Capacity = Up to 18 points
    - **Added:** Capacity to serve population targeted by Project
Appeals Process

- **What can be appealed:** An application that
  - Was not evaluated according to the published local NOFA process **AND/OR**
  - Evaluated in a way that violates federal regulations **AND**
  - **The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all.**
  - includes **any** Project who meet Appeals Criteria #1 and/or #2, and its initial Rating and Ranking score appears very close to the end of Tier 1, and can be moved down to Tier 2 as a result of scoring post appeals.
Appeals Process

What is not eligible for appeal:

- Errors or omissions by project Applicants
- Projects that do not meet threshold
- Dissatisfaction with Project's scores
- Need for funds
- Appeals submitted after stated deadline

Process:

Please review Exhibit A - 2018 Appeals Project at EveryOne Home website
Submission Deadlines and Requirements

- Submission of Renewals and New Projects Local Application by **August 17\textsuperscript{th} at 5 pm**
- Frequently Asked Questions (FAQ) period starts today and ends on **August 2\textsuperscript{nd}**
- Include back-up documentation in a PDF – this file name must include the name of the program and agency
- Projects must also complete a project application in *e-snaps* by close of business on **TBD**
Resources on Website

Electronic versions of the Renewal and New Projects Applications and Appendices can be downloaded from the EveryOne Home website at:
2018 CoC Renewal Project Evaluation Instructions

EveryOne Home, Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting renewing CoC projects anticipating CoC-funds in 2018 to participate in the Project Evaluation of Objective Criteria – Stage 1 of the 2018 NOFA Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its NOFA Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD NOFA is released

The United States Department of Housing and Urban Development (HUD) requires that all Project applications included in the CoC Collaborative Application be rated and ranked by the local Continuum of Care (CoC). Without a local application, Projects cannot be scored or ranked and cannot be included in the final application package. New this year, 2/3rds of Renewal projects’ objective criteria (scored during the Local Application competition in the past) will be scored earlier by EveryOne Home Staff during the Project Evaluation of Objective Criteria. The Project Evaluation Process introduces the automation of data calculations using the EveryOne Home Target Population Report Tool and the newly created EveryOne Home APR Tool. Preliminary scores awarded during the Project Evaluation stage will be cumulative with scores awarded in the Local Application Package expected in the Summer of 2018, pending HUD’s NOFA release.

Project Evaluation due date: Thursday, April 26, 2018 by 5pm via email to info@everyonehome.org.

The Projects’ preliminary scores resulting from the Project Evaluation of Objective Criteria will be released to projects on Monday, April 30, 2018 via email.

Project types that must submit the attached Project Evaluation Form:
- Renewing Transitional Housing (TH) (both youth-serving and general-use),
- Renewing Permanent Supportive Housing (PSH),
- Renewing Rapid Rehousing (RRH),

Note: The Project Evaluation Package is for Renewal CoC projects only. Newly proposed projects will be asked to complete a Local Application Package TBD in the Summer of 2018 (post HUD’s NOFA release) and should not make any submissions at this time.

Eligible Renewal Projects:
Applicants for Renewal Projects must be listed as the current grant recipient on the CoC’s 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the GIW, please contact Riley Wilkerson at Riley.Wilkerson@acgov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant.

Threshold Requirements Established in 2017 NOFA Local Process:
All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify Coordinated Entry of all openings and fill those openings with participants referred from Coordinated Entry. All 2017 NOFA Local competition applicants were required to certify they are aware of this expectation and are already complying or would be compliant by the end of 2017. In addition, PSH projects were required to have an executed Memorandum of Understanding with Home Stretch (the Coordinated Entry registry for PSH) and an updated inventory on file with the CoC by September 25, 2017 to be included in the 2017 NOFA application package.
Projects that are not planning on renewing their CoC funding:
Projects who find mainstream funders to cover project costs with resources that are a better fit, or that determine they are unlikely to receive the minimum score on the Summer 2018 Local Application may elect not to submit an eligible project for renewal. Projects eligible to be renewed, but not planning on renewing CoC funding in the 2018 NOFA competition, must report it via email to EveryOne Home at info@everyonehome.org by the April 26th deadline, and certify the projects’ withdrawal as part of the Local Application Package in Summer 2018.

The funds for projects not electing to renew will be added to the pool of available funds for reallocation to new projects. The decision not to renew is permanent. Once eliminated from the package, the same project cannot reapply in subsequent years. Only new projects created by reallocated funds or bonus funds can get added to our package in future application rounds.

Projects renewing for the first time that are not yet under contract, or which were not in operation for a full twelve months since October 1, 2016: Renewing projects without a year of operation and expenditures need only to submit an updated Project Cover Sheet. They will receive the score awarded when they applied as a new project and be ranked according to that score.

Projects with a start date later than October 1, 2016 and a full year of program data may elect to receive the score awarded when they applied as a new project or submit a full Project Evaluation Package based on data from their start date to twelve months later. Projects that choose to keep their prior score need only to submit an updated Project Cover Sheet. Projects which elect to keep their earlier scores may also be asked to complete a Project Milestone Update as part of a Monitoring TA/Site Visit.

New TH-RRH Projects can have the option to: 1) keep the score obtained when applying as a new TH-RRH project in 2017, or 2) or submit a full Project Evaluation Package to be evaluated according to data from 2017 as a general TH Project.

Submission Requirements:
All project types must submit their Project Evaluation Package response via email to EveryOne Home at info@everyonehome.org, by 5pm, April 26, 2018. In addition to the completed Project Evaluation Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the applicant and project names.

The Project Evaluation Package will be released on Tuesday, March 27, 2018, collecting Annual Performance Reports (APR) and supplemental objective information. A complete submitted Package will contain: 1) an updated Project Cover Sheet; 2) a complete Project Evaluation Form; 3) a copy of the EOH Target Population Report Tool; 4) a copy of the new EOH CoC APR Tool; and 5) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Projects to receive full points on a related section of the Evaluation. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.
Required Documentation (see Checklist under Project Evaluation Form, Page 1):

1. HMIS-Based Reports: Reports should be run for the federal fiscal year October 1, 2016 – September 30, 2017 - not the calendar year. If the Project has been operational for at least 12 months, but started after October 1, 2016, please use the first 12 months of operation for the report date range (e.g. if Project started December 1, 2016, run a report for December 1, 2016 – November 30, 2017):
   b. New: EveryOne Home HUD CoC APR Tool. (See Attachment B – Instructions to Run Program APR Report and EOH APR Tool)
   c. Annual Performance Report (APR).

2. Housing First Documents:
   a. Existing Project Participant Agreement; Lease or sub-Lease, and/or House Rules.
   b. Existing Eligibility Criteria and a Housing Application.

3. Client Eligibility:
   a. Existing program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, etc.), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. HOPWA or MHSA require specific disabilities).

4. Grant and Fiscal Management Documents – Lead Agencies only
   a. Proof of submission of the last three APRs, including due date and date of submission.
   b. Proof of LOCCS draws, including date of draw request, for the last two complete grant cycles.
   c. Most recent annual audit with Management Letter—must be from a fiscal year ending December 31, 2016 or later. Agencies not required to have an annual independent audit, must submit financial statements from the most recently ended fiscal year prepared according to Circular A-133 generally accepted accounting principles. Jurisdictions and public agencies may provide a link to their audits, with page numbers of relevant information such as findings etc.
   d. Proof of 501c3 standing if applicable. Failure to provide standing (if applicable) can result in exclusion from the package.
   e. Evidence of Site Control (Direct-Grantee Site-Based projects. Scattered-site PSH & RRH projects exempt) - this is required for any existing projects for which HUD is paying leasing, operating or rehabilitation cost on a building, both residential and service delivery sites. Without evidence of site control for renewal projects for whom the above is true, the project cannot be included in the package.

Project Scoring:
EveryOne Home staff will complete the evaluation and scoring of Projects and provide a Project Evaluation of Objective Criteria Report with preliminary scores to grantees along with next steps. Objective Criteria’s score sheets will be made available upon request for 2 business days after release of Project Evaluation Reports. Applicants will then have 2 business days to report mathematical errors and any discrepancies in their score sheets to EOH Staff at info@everyonehome.org.

Project Applications who receive a low score in any of the following areas: Housing First, Performance Outcomes A-D, Proof of Eligibility, Capacity and Utilization, HMIS Data Quality, or Fiscal Management may be contacted by EveryOne Home staff to schedule a Monitoring Technical Assistance (TA)/Site Visit to provide support and further guidance. Projects may also elect to request a TA/Site Visit to improve scoring during the Local Application. The NOFA Committee will recommend and approve criteria for Projects’ receipt of TA follow-up, and points for additional supportive narratives for projects with low scoring sections in the Project Evaluation stage.

2018 Renewals’ Project Evaluation Package Page iii
Renewal Project applications will be scored on a 79-point scale in five categories of Objective Criteria:

1. Primary Activity Type = Up to 5 points
2. How Project Helps Address Local and HUD Priorities = Up to 16 points
3. Outcome Performance = Up to 32 points
4. Grant Management = Up to 20 points
5. Organization Capacity = Up to 6 points

The Scoring Tool at the back of the Evaluation Form details how Projects earn points in each category. The Evaluation Form and Scoring Tool are tightly linked. The Scoring Chart at the end can be detached and used alongside many of the sections in the Evaluation Form to self-score the Project, in anticipation to the Project Evaluation's preliminary score. Grantees are strongly encouraged to review their Project Evaluation Package, and to self-score on the performance indicators as soon as possible to allow ample time for data review prior to Project Evaluation's submission.

As noted on Page 1, the Project Evaluation Package is for Renewal CoC projects only. Newly proposed projects will be asked to complete a Local Application Package TBD in the Summer of 2018 (post HUD’s NOFA release) and should not make any submissions at this time. After the NOFA is released, the Local Application (for New and Renewals) and corresponding documents will be updated to address any unexpected changes or additional HUD requirements. All changes will be approved by the NOFA Committee.

Download a PDF version of this Evaluation Form from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed Form and its attachments in PDF form with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on page 1. Multiple PDFs for agencies with large files for backup are acceptable. Public entities are welcome to submit their audits via link in the cover email with page numbers of findings and management letters indicated in their communication.

For questions regarding the completion of the Project Evaluation Package please contact EveryOne Home at info@everyonehome.org.

A ZOOM meeting for Technical Assistance has been scheduled for Friday, March 30th from 1-3pm with EveryOne Home Staff. Any projects needing assistance running either the EveryOne Home Target Population Report Tool, the EveryOne Home Annual Performance Report (APR) Tool, or who have any other questions related to the Project Evaluation Package are invited to attend remotely. Additional details will be emailed to Grantees subscribed to the Everyone Home mailing list and posted on the EveryOne Home website.

In correlation with previous NOFAs, a Frequently Asked Questions (FAQ) period will begin on April 2, 2018 and end on April 6, 2018. All questions received will be responded to individually in writing as well as posted to the EveryOne Home website on Friday, April 6, 2018.

All project applications received by the deadline will be reviewed and applicants will be notified by Monday, April 30th, 2018 of their preliminary scores.
EveryOne Home EVALUATION FORM for 2018 CoC RENEWAL PROJECT EVALUATION PACKAGE

Checklist of required documentation for all projects submitting a Project Evaluation Package:

HMIS-based Reports:
- [ ] EveryOne Home HUD Target Population Report Tool (in Excel form)
- [X] New: EveryOne Home HUD CoC APR Tool (in Excel form)
- [ ] Annual Performance Report (APR) from date range: 10/1/2016 – 9/30/2017

Housing First Documents:
- [ ] Existing program Participant Agreement; Lease and sub-Lease, and/or House Rules
- [ ] Existing program Eligibility Criteria and a Housing Application

Client Eligibility:
- [ ] Existing program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, vet, etc.), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. HOPWA or MHSA require specific disabilities)

Grant and Fiscal Management:
- [ ] Proof of submission of the last three APRs, including due date and date of submission
- [ ] Proof of LOCCS draws, including date of draw request, for the last two complete grant cycles
- [ ] Most recent annual independent audit with Management Letter or financial statement if audit not required —must be from a fiscal year ending December 31, 2015 or later
- [ ] Proof of 501c3 non-profit status (if applicable)
- [ ] Evidence of Site Control (Direct-Grantee Site-Based projects. Scattered-site PSH & RRH projects exempt)
i. Project Cover Sheet (Up to 5 points):

a. Primary Activity Type (up to 5 points)
New in 2018, Renewal Projects are required to review a Project Cover Sheet as part of the Project Evaluation Package submission. Given that previous NOFA Local Application’s General Section contained some fixed information, Projects will now be able to respond to a simpler evaluation by confirming and/or updating pre-populated responses. The Cover Sheet is pre-populated by EveryOne Home using responses provided in the 2017 NOFA Local Application and sent to applicable projects/agencies via email at the start of the Project Evaluation Package Submission period (3/27/18 - 4/26/18). Newly proposed Projects will be asked to complete a Project Cover Sheet as part of the Local Application Package, coming Summer 2018 pending HUD NOFA release. Please do not make any submissions during the Project Evaluation period.

Consistent with past NOFAs, the Primary Activity Type of each project will be worth up to 5 points. Responses in this section will be verified using the Grant Inventory Worksheet (GIW), the Housing Inventory Chart (HIC), and APR calculations performed by the EOH Target Population Report Tool, the EOH APR tool, and EOH staff.

To complete this section, Applicants are asked to:

i. Review the Project Cover Sheet forwarded by EveryOne Home for accuracy. For the number of CoC funded units, please refer to the GIW. For the Total number of Beds and Total Number of Units, please refer to the HIC report. To view a redacted version of the 2017 HIC and/or GIW, please see Attachment D - 2017 HIC and GIW.

ii. Fill-in all missing information highlighted in yellow. If there is a discrepancy between the reported number of CoC-funded units described in the GIW and the number of units in the HIC report, or if you have made any other changes to your Cover Sheet, please explain:

iii. Include a photo of the physical exterior of the Project’s location, if one has not been provided already (Domestic Violence or human trafficking providers may use Project/Agency logo. Services-only providers may use a photo of their main office space/headquarters within Alameda County).

iv. Submit an updated Project Cover Sheet in PDF form as part of the Project Evaluation Package.

Projects that are renewing for the first time, not yet under contract, were not in operation for a full twelve months since October 1, 2016, have a start date later than October 1, 2016 AND a year of data, or new Joint TH-RRH choosing to keep their previous score NEED ONLY SUBMIT AN UPDATED PROJECT COVER SHEET. They will receive the score awarded when they applied as a new project and be ranked according to that score. Projects that choose to keep their prior score may also be asked to complete a Project Milestone Update as part of a Monitoring TA/Site Visit.
ii. HUD PRIORITIES (Up to 16 points):

   a. Target Populations and Severity of Need (up to 10 points)
      For help on running on the Target Population Report Tool please refer to Attachment A -
      Instructions for 2018 HUD NOFA Target Population Report and see Attachment B - Instructions to
      Run Program APR Report and EOH APR Tool for help with running your program APR or the EOH
      APR Tool.

      i. Ending Chronic Homelessness: If project is Permanent Supportive Housing or Services tied
         to Permanent Supportive Housing, how does it serve chronically homeless individuals and
         families?

        ☐ Existing project that serves 100%, all units in project are dedicated to the chronically
         homeless. (Must be verifiable in attached EOH HUD CoC APR Tool)

        ☐ Existing project that elected to become DedicatedPLUS in 2017.

        ☐ Not all units are dedicated, but by policy and practice 100% of turnover units are
         prioritized to chronically homeless.
         Is this policy currently in place and operational?
         ☐ Yes ☐ No

         What percent of households who entered the program from 10/1/2016 – 9/30/2017 had one or
         more chronically homeless persons?  
         (Must be verifiable in attached HUD NOFA Target Population Report Tool from 10/1/2016 -
         9/30/2017)

   ii. Rapidly Rehousing Families:

         ☐ Existing Rapid Rehousing for Families, individuals or transition age youth.

   iii. Youth (individuals and families with TAY as head of household):

         ☐ 50% or more of heads of households are TAY

         If yes, what percentage of heads of households were TAY?  
         (Must be verified by attached HUD NOFA Target Population Report Tool from 10/1/2016 -
         9/30/2017)

   iv. Veterans:

         ☐ 50% or more of heads of households are Veterans
What percentage of heads of households were Veterans? [ ] (Must be verified by attached HUD NOFA Target Population Report Tool from 10/1/2016 - 9/30/2017)

v. Those coming directly from the streets:

[ ] 50% or more of heads of households entered the program directly from the streets

What percentage of heads of households entered directly from the streets?

[ ] (Must be verified by attached HUD NOFA Target Population Report Tool from 10/1/2016 - 9/30/2017)

vi. Domestic Violence or human trafficking:

[ ] 50% or more of heads of households are fleeing Domestic Violence or human trafficking

What percentage of heads of household were survivors of domestic violence?

[ ] (Must be verified by attached HUD NOFA Target Population Report Tool from 10/1/2016 - 9/30/2017)

b. Utilizing a Housing First Approach (up to 6 Points)

For this section, scoring will be based on review of documents that demonstrate the specific project adheres to some of the Housing First principles (low barrier/no preconditions to entry; voluntary services and program retention; rapid placement and stabilization in permanent housing). Please submit any supporting documentation (refer to Checklist under Housing First Documents) as an Attachment to your Project Evaluation Package. Use the appropriate boxes below to indicate Document Name, File/Attachment Name, and Page numbers which refer to any policies and procedures related to Housing First principles. HUD defines Housing First as “a model of housing assistance, including transitional housing and support services only projects, that operate with low-barriers or no preconditions (such as sobriety or minimum income threshold), which prioritizes rapid placement and stabilization in permanent housing, and that does not require participation in supportive services (2017 NOFA, Page 21)”.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
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iii. OUTCOMES PERFORMANCE (Up to 32 points):

a. APR Performance Outcomes (up to 32 Points)
The following section is related to project performance on local and HUD required outcomes. New to the 2018 NOFA, the EOH APR tool will perform automatic calculations of certain sections of Performance Outcome measures. Please read Attachment B carefully for a detailed guide on how to run your project’s APR Report and the EOH APR Tool. Renewal projects should complete the APR Tool depending on project type. If your project started on or before October 1, 2016, you must attach a copy of your APR for 10/1/2016 – 9/30/2017 (refer to Checklist for HMIS-based reports). For detailed illustrations of calculations made by the EOH APR Tool and EOH Target Population Tool using sample tables and formulas, please see Attachment C - Instructions for Manual Calculations of Performance Outcome Measures A-D, Capacity and Utilization Measure, HMIS Data Quality Measure, and HUD Target Population Report.

b. Scoring depending on project type. Please complete this section using the scores indicated in the applicable Report tab of the EOH APR tool for your program. You must attach a copy of your APR for 10/1/2016 – 9/30/2017 and your APR Tool for verification. If your project has a start date later than 10/1/2016 and one full year or program data, please run your APR from your start date to 12 months later.

1. Permanent Supportive Housing

<table>
<thead>
<tr>
<th>Outcome Measure</th>
<th>APR for Outcomes A-D</th>
<th>Benchmark</th>
<th>Score: Please see scoring sheet for score</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. People Retaining permanent housing &gt; 12 months</td>
<td></td>
<td>90%</td>
<td></td>
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<tr>
<td>B. Adults stayers and leavers who maintain or increase income</td>
<td></td>
<td>50%</td>
<td></td>
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<tr>
<td>C. Adults obtaining or maintaining non-cash mainstream benefits</td>
<td></td>
<td>56%</td>
<td></td>
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<tr>
<td>D. # of persons who exited to homelessness</td>
<td></td>
<td>Approx. 10% of total bed capacity (see Page 15, 2018 Scoring for Outcome Measures, by Sector, and Reference Table for PSH Outcome Measure D)</td>
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2. Rapid Rehousing and Transition Aged Youth-Serving TH

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<thead>
<tr>
<th>Outcome Measure</th>
<th>APR for Outcomes A-D</th>
<th>Benchmark</th>
<th>Score: Please see scoring sheet for score</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. People Who Obtain Permanent Housing</td>
<td></td>
<td>80%</td>
<td></td>
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<tr>
<td>B. Adult Stayers and Leavers Who Increase Income</td>
<td></td>
<td>30%</td>
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<tr>
<td>Outcome Measure</td>
<td>APR for Outcomes A-D</td>
<td>Benchmark</td>
<td>Score: Please see scoring sheet for score</td>
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<tr>
<td>A. People Who Obtain Permanent Housing</td>
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<td>80%</td>
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<td>B. Adults Stayers and Leavers Who Maintained or Increased Income</td>
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<td>50%</td>
<td></td>
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<tr>
<td>C. Adults obtaining or maintaining non-cash mainstream benefits</td>
<td></td>
<td>56%</td>
<td></td>
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<tr>
<td>D. Median Length of Stay in Program</td>
<td></td>
<td>Median LOS &lt; 180 days</td>
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</tbody>
</table>

### iv. GRANT MANAGEMENT (Up to 20 points)

The Grant Management section contains evidence of LOCCS draws, and submission of on-time APRs\(^1\), which are the responsibility of the Grantee Agency. Any sub-grantees completing the Project Evaluation on behalf of the Project can obtain the information for this section from the Grantee.

#### a. Reports and Invoicing – (Up to 10 points)

i. Timely Submission of APRs:

   Proof of timely submissions can be demonstrated via e-snaps as indicated in the screenshot below.

   - End date of Grant
   - Due date of APR

<table>
<thead>
<tr>
<th>Submission dates of APR:</th>
<th>Most Recent Year</th>
<th>Prior Year</th>
<th>Two years Prior</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

\(^1\) In the case that a submitted APR is missing from your list, please contact your HUD Program officer to see about having the issue corrected. If that is not possible, written verification of the on-time submission from the HUD Program Office to accompany the screenshot will be sufficient.
### Funding Opportunity Name

#### Start Date | End Date | Associate Type | Version | Date Submitted
---|---|---|---|---
CoC Full Annual Performance Report | Jul 10, 2010 | Jun 1, 2011 | Primary Applicant | 1 | Jan 20, 2012 2:57 PM
CoC Full Annual Performance Report | Jul 10, 2014 | Jun 1, 2015 | Primary Applicant | 1 | Jan 24, 2016 2:26 PM

### ii. Timely Draw Downs from LOCCS - Primary Grantees only, for their projects and any sub-recipient projects.

Proof of timely draw downs can be demonstrated via LOCCS, as indicated in the screen shot below.

- Grant year from [ ] to [ ]
- Dates of draw requests from last two grant cycles [ ]
Note: Submissions must include all columns presented below.

<table>
<thead>
<tr>
<th>Voucher No</th>
<th>Entered</th>
<th>Amount</th>
<th>Schedule No</th>
<th>Ent Deposit Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>10122376</td>
<td>07-27-2016 by</td>
<td>187,775.48</td>
<td>1014792</td>
<td>06-26-2016</td>
</tr>
<tr>
<td>31253962</td>
<td>06-28-2016 by</td>
<td>711,750.00</td>
<td>1014792</td>
<td>02-26-2017</td>
</tr>
<tr>
<td>31253962</td>
<td>08-26-2016 by</td>
<td>30,805.00</td>
<td>1014792</td>
<td>03-01-2016</td>
</tr>
<tr>
<td>31253962</td>
<td>10-26-2016 by</td>
<td>1,005,442.40</td>
<td>1014792</td>
<td>03-01-2016</td>
</tr>
<tr>
<td>500313428</td>
<td>11-20-2013 by</td>
<td>270,812.80</td>
<td>1014792</td>
<td>11-20-2013</td>
</tr>
</tbody>
</table>

b. Site Control
Renewing Direct-Grantee, Site-Based Projects. Scattered-site PSH & RRH are exempt from this requirement. Does the Project include one or more buildings (housing or service site) that is owned or long-term leased by the grantee or a sub-recipient? If so, applicants must include proof of site control in the form of a lease, title, or other documentation as an attachment to the Project Evaluation Package (refer to Checklist under Grant and Fiscal Management, on Page 1). Indicate in the appropriate boxes below the Document Name, File/Attachment Name, and Page Number(s) which refer to site control. If you are a Jurisdictional Lead Agency and contract out the delivery of services to sub-grantees, you may submit evidence of sub-grantees site control or certify by letter that your sub-grantees have site control for site-based housing and services.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c. Capacity and Utilization (Up to 5 Points):
This Section is related to project performance on local Capacity and Utilization benchmarks. New to the 2018 NOFA, the EOH APR tool will perform automatic calculations of Capacity and Utilization. Please read Attachment B carefully for a detailed guide on how to run your projects’ APR Report as well as the EOH APR Tool. Complete this Section using the scores indicated in the applicable Report tab of the EOH APR tool for your Project. See Attachment C for detailed illustrations of calculations made by the EOH APR tool using sample tables and formulas.

Site-based Projects (PSH and TH):
Number of Units in project =
Utilization Rate: Median # of Households / Number of Units in Project

2018 Renewals’ Project Evaluation Package Page 8
Scattered Site PSH and RRH:

Number of contracted subsidies/slots in project =

Utilization Rate = # of Households served / Number of contracted subsidies in project =

d. Client Eligibility (Up to 5 points):
New in 2018, Client Eligibility is under objective criteria. Scoring for this Section will be based on review of documents that demonstrate the specific project has adequate procedures for determining, verifying, and documenting client eligibility. PSH Projects: Per CoC requirements, all vacancies in project are to be filled using Coordinated Entry referrals, as indicated in the HomeStretch MOU.

Please submit any supporting documentation (for specifics, please refer to Checklist under Client Eligibility, Page 1) as an attachment to your Project Evaluation Package. Use appropriate boxes below to indicated Document Name, File/Attachment name, and Page Number(s) which refer to any policies and procedures related to Client Eligibility.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
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<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

v. ORGANIZATIONAL CAPACITY (Up to 6 Points)

a. HMIS Data Quality (Up to 2 points)
As of 2017, changes in the APR allow data quality to be extracted directly from that report, with no need to run an HMIS Data Completeness Report Card. New to the 2018 NOFA, the EOH APR tool will perform automatic calculations of HMIS Data Quality. Please read Attachment B carefully for a detailed guide on how to run the APR Report as well as the EOH APR Tool. Complete this Section using the scores indicated in the applicable Report tab of the EOH APR tool for your program. See Attachment C for detailed illustrations of calculations made by the EOH APR tool using sample tables and formulas.

HMIS Data Quality Score (%) as indicated in EOH APR tool =

b. Fiscal Management – (4 points)

i. Does this project or the applicant agency have any of the following issues: 1) Any audit or monitoring findings from any HUD source (these could include, but are not limited to: ESG, HOPWA, HOME, CDBG as well as CoC funding); 2) A current outstanding obligation to HUD
which is in arrears or for which a payment schedule has not been agreed upon; 3) Audit findings from your Annual Independent Audit which remain unresolved?

☐ No  ☐ Yes

ii. Has HUD instituted any sanctions on any project of your agency, including, but not limited to, suspending disbursements (e.g., freezing LOCCS), requiring repayment of grant funds, or de-obligating grant funds due to performance issues?

☐ No  ☐ Yes  If yes, please include written communications from HUD concerning those matters as an attachment to your Project Evaluation package.

*Attach a copy of the direct grantee’s most recent Annual Independent Audit / Financial Statement from no earlier than 12/31/2016 (refer to Checklist for Grant and Fiscal Management). Indicate Document name, File name, and page number(s) of Audit findings in applicable boxes below. Audits from subgrantees are not required. Applicants who can provide a link to an on-line version of your audit may do so for ease of submission by including the link in your cover email. All other applicants please submit your documents in PDF form attached to your submission email. Explain if the audit is not for the most recently finished fiscal year. All applicants must include a copy of their Annual Independent Audit regardless of answers to any question in this section.*

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Points for NOFA Project Evaluation for Objective Criteria - Renewal Projects

**Total points available = 79**

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Project Cover Sheet = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>1.b Primary Activity type = 5 Points maximum</td>
<td>Existing Permanent Housing (PSH &amp; RRH) and Youth-Serving TH = 5 Points</td>
</tr>
<tr>
<td></td>
<td>General use (non-youth serving) Transitional Housing = 3 Points</td>
</tr>
<tr>
<td>2. Project addresses Local and HUD Priorities = 16 Points maximum</td>
<td></td>
</tr>
<tr>
<td>2.a Target populations and severity of need = (up to 10 points)</td>
<td>Provides PSH to 100% of chronically homeless households as evidenced by EveryOne Home HUD CoC APR tool = 10 Points</td>
</tr>
<tr>
<td></td>
<td>Existing PSH which became DedicatedPLUS in 2017 = 9 Points</td>
</tr>
<tr>
<td></td>
<td>Provides PSH and fills 100% of turnover with chronically homeless households as evidenced by EveryOne Home HUD Target Population Report tool = 8 Points</td>
</tr>
<tr>
<td></td>
<td>Provides Rapid Rehousing to families, individuals and/or transition aged youth as evidenced by APR = 8 Points</td>
</tr>
<tr>
<td></td>
<td>Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = 6 Points</td>
</tr>
<tr>
<td></td>
<td>Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = 3 Points</td>
</tr>
<tr>
<td></td>
<td>Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = 6 Points</td>
</tr>
<tr>
<td></td>
<td>Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = 3 Points</td>
</tr>
<tr>
<td></td>
<td>EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of heads of households entered project from the streets or other places not meant for human habitation = 8 Points</td>
</tr>
<tr>
<td></td>
<td>EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of heads of households entered project from the streets or other places not meant for human habitation = 4 Points</td>
</tr>
<tr>
<td></td>
<td>EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of heads of households are fleeing domestic violence and/or human trafficking = 6 Points</td>
</tr>
<tr>
<td></td>
<td>EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of heads of households are fleeing domestic violence and/or human trafficking = 3 Points</td>
</tr>
</tbody>
</table>

Check any boxes that are true and can be verified by back up documentation. Project will receive the score from the highest single point value that can be verified; section is not cumulative.
| 2.b Housing First and Low Barrier documentation = 6 Points maximum if documents demonstrate adherence to specific Housing First principles. All applicable boxes can be checked, and points will be cumulative up to 6 points for this section. | Eligibility Criteria/Housing Application provided for renewing projects, demonstrate low barriers to entry and no preconditions. To earn maximum points in this section, documents must demonstrate project does not reject individuals and families with criminal histories = 2 Points |
| | Participant Agreement, Lease, and/or House Rules provided for renewing projects, demonstrate voluntary participation in services and prioritizing engagement and problem-solving over therapeutic goals = 2 Points |
| | Participant Agreement, Lease, and/or House Rules provided for renewing projects, demonstrate project prioritizes rapid placement and stabilization in permanent housing including showing eviction back to homelessness is avoided = 2 Points |

| 3 Outcome Performance = 32 Points maximum |
| 3.a APR Performance Outcomes A-D = 32 Points maximum | See Sector Specific Benchmarks and Self Scoring Charts on the following pages. |

| 4 Grant Management = up to 20 Points maximum |
| 4.a Reports and Invoicing = 10 points maximum | Project provided evidence of on time submission of APRs and quarterly LOCCS draws for the last two grant cycles or for as long as the project has operated if less than three years old = 10 Points |
| | Project provided evidence of on-time submission of APRs and quarterly LOCCS draws for the last two grant cycles or for as long as the project has operated if less than three years old, at least 75% of time = 5 Points |

| 4.b Capacity and Utilization = 5 points maximum |
| | The project was fully utilized (100%) during the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 5 Points |
| | The existing project was utilized to 90-99% during the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 4 Points |
| | The project was utilized to 80-89% during the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 2 Points |
| | The project was utilized at less than 80% for the program year, as evidenced by the EveryOne Home HUD CoC APR Tool = 0 Points |

<p>| 4.c Client Eligibility = 5 points maximum | Project’s written policy clearly describes client eligibility requirements and funding sources (i.e. eligibility requirements for mental health funding contracts), and requirements are consistent with specific project eligibility information provided to Coordinated Entry/HomeStretch = 2 Points |
| | Project has clear, written procedures for verification of client eligibility and homeless history, in addition to proof of referrals from Coordinated Entry/HomeStretch (i.e., CE HUB provides verification documentation, staff verification of 3rd party documentation, etc.) = 3 Points |</p>
<table>
<thead>
<tr>
<th></th>
<th>Organizational Capacity = 6 points maximum for entire section</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.a</td>
<td>HMIS Data Completeness Report Card = 2 Points maximum</td>
</tr>
<tr>
<td></td>
<td>□ Exiting project’s data quality score is greater than or equal to 95%, as evidenced by the EveryOne Home HUD CoC APR Tool = 2 Points</td>
</tr>
<tr>
<td></td>
<td>□ Greater than or equal to 90% and below 95%, as evidenced by the EveryOne Home HUD CoC APR Tool = 1 Point</td>
</tr>
<tr>
<td></td>
<td>□ Below 90%, as evidenced by the EveryOne Home HUD CoC APR Tool = 0 Points</td>
</tr>
<tr>
<td>5.b</td>
<td>Fiscal Management = 4 points maximum</td>
</tr>
<tr>
<td></td>
<td>□ Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2016, that shows no findings or areas of concern in the management letter. = 4 Points</td>
</tr>
<tr>
<td></td>
<td>□ Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2015, that does show findings or areas of concern in the management letter. = 0 Points</td>
</tr>
</tbody>
</table>

### Local Application Criterion – Renewal Projects

<table>
<thead>
<tr>
<th></th>
<th>Project Evaluation of Objective Criteria Preliminary scores (Up to 79 points)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Note: Preliminary Project Evaluation scoring for Renewals is cumulative with Local Application scores</td>
</tr>
<tr>
<td>2</td>
<td>Narrative for Housing First (up to 4 points)</td>
</tr>
<tr>
<td></td>
<td>Note: Points will be cumulative (up to 10 points) for this Section when combined with the Project Evaluation Package’s Housing First Objective Criteria preliminary scores.</td>
</tr>
<tr>
<td>5</td>
<td>Narrative for Community Engagement – Not Scored in 2018.</td>
</tr>
<tr>
<td>6</td>
<td>Narrative(s) for Performance Outcomes A-D (Low scoring projects, criteria and scoring to be determined and approved by NOFA Committee)</td>
</tr>
<tr>
<td>7</td>
<td>Spending (Criteria to be determined and approved by NOFA Committee) (5 points)</td>
</tr>
<tr>
<td>8</td>
<td>Cost Effectiveness (Criteria to be recommended by workgroup and approved by NOFA Committee) (5 points)</td>
</tr>
<tr>
<td>9</td>
<td>Narrative for Client Eligibility (Low scoring projects, criteria and scoring to be determined and approved by NOFA Committee)</td>
</tr>
<tr>
<td>10</td>
<td>Narrative for Fiscal Management (Low scoring projects, criteria and scoring to be determined and approved by NOFA Committee)</td>
</tr>
<tr>
<td>11</td>
<td>Narrative for Quality Assurance (up to 7 points)</td>
</tr>
</tbody>
</table>

**Total Local Application Points Possible: 21**

**Total Project Evaluation Points Possible: 79**

*Note: Local Application scoring for Renewals is cumulative with preliminary Project Evaluation scores*

**Total Points Possible: 100**

2018 Renewals’ Project Evaluation Package Page 13
### 2018 Scoring for Outcome Measures, by Sector

#### 1. Permanent Supportive Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Retains and/or exits to other Permanent</td>
<td>95%</td>
<td>☐ Meets or exceeds local benchmark in an existing project = 10 Points&lt;br&gt;☑ Is within 5 percentage points of the local benchmark in existing project = 8 Points&lt;br&gt;☐ Is within 10 percentage points of the local benchmark within an existing project = 4 Points&lt;br&gt;☐ Is &gt; 10 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td>Housing &gt; 12 months</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B Adults who maintain or increase income</td>
<td>50% of leavers and stayers</td>
<td>☐ Meets or exceeds local benchmark in existing project = 7 Points&lt;br&gt;☐ Is within 5 percentage points of the local benchmark in existing project = 5 Points&lt;br&gt;☐ Is within 10 percentage points of the local benchmark in existing project = 3 Points&lt;br&gt;☐ Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>C Obtains/maintains non-cash mainstream</td>
<td>56% leavers and stayers</td>
<td>☐ Meets or exceeds local benchmark in existing project = 7 Points&lt;br&gt;☐ Is within 5 percentage points of the local benchmark in existing project = 5 Points&lt;br&gt;☐ Is within 10 percentage points of the local benchmark in existing project = 3 Points&lt;br&gt;☐ Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>benefits</td>
<td></td>
<td></td>
</tr>
<tr>
<td>D Exits to Homelessness</td>
<td>Approx. 10% of total bed</td>
<td>☐ Meets or exceeds local benchmark in existing project = 8 Points&lt;br&gt;☐ Is within 1 exit of local benchmark in existing project = 6 Points&lt;br&gt;☐ Is within 2 exits of local benchmark in existing project = 3 Points&lt;br&gt;☐ Is 3 or more exits above the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>capacity</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Reference Table for PSH Outcome Measure D

<table>
<thead>
<tr>
<th>Total Bed Capacity in Program</th>
<th>Benchmark Number of Exits to Homelessness (Approx. 10% of bed capacity)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-14</td>
<td>1</td>
</tr>
<tr>
<td>15-24</td>
<td>2</td>
</tr>
<tr>
<td>25-34</td>
<td>3</td>
</tr>
<tr>
<td>35-44</td>
<td>4</td>
</tr>
<tr>
<td>45-54</td>
<td>5</td>
</tr>
<tr>
<td>55-64</td>
<td>6</td>
</tr>
<tr>
<td>65-74</td>
<td>7</td>
</tr>
<tr>
<td>75-84</td>
<td>8</td>
</tr>
<tr>
<td>85-94</td>
<td>9</td>
</tr>
<tr>
<td>95-104</td>
<td>10</td>
</tr>
<tr>
<td>105-124</td>
<td>12</td>
</tr>
<tr>
<td>125+</td>
<td>18</td>
</tr>
</tbody>
</table>
### 2. Rapid Rehousing, Youth Serving Transitional Housing and Joint TH and PH-RRH

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtain Permanent Housing</td>
<td>80%</td>
<td>☐ Meets or exceeds local benchmark in existing project = 10 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of the local benchmark in existing project = 8 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 10 percentage points of the local benchmark within an existing project = 4 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 10 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td>B Adults who Increase Income</td>
<td>30% of leavers and stayers</td>
<td>☐ Meets or exceeds local benchmark in existing project = 7 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of local benchmark in existing project = 5 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 10 percentage points of local benchmark in existing project = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>C Obtain or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td>☐ Meets or exceeds local benchmark in existing project = 7 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of local benchmark in existing project = 5 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 10 percentage points of local benchmark in existing project = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td>D Returns to Homelessness</td>
<td>&lt;10%</td>
<td>☐ Meets or exceeds local benchmark in existing project = 8 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 5 percentage points of local benchmark in existing project = 6 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is within 8 percentage points of local benchmark in existing project = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Is &gt; 8 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
</tbody>
</table>
### 3. General (non-youth serving) Transitional Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
</table>
| A Obtains Permanent Housing | 80% | - Meets or exceeds local benchmark = 10 Points  
- Is within 5 percentage points of the local benchmark = 8 Points  
- Is within 10 percentage points of the local benchmark = 4 Points  
- Is > 10 percentage points below the local benchmark = 0 Points |
| B Adults who maintain or increase income | 50% of leavers and stayers | - Meets or exceeds local benchmark = 7 Points  
- Is within 10 percentage points of local benchmark = 6 Points  
- Is within 15 percentage points of local benchmark = 3 Points  
- Is > 15 percentage points below the local benchmark = 0 Points |
| C Obtains or Maintains non-cash Mainstream Benefits | 56% leavers and stayers | - Meets or exceeds HUD benchmark = 7 Points  
- Is within 5 percentage points of HUD benchmark = 6 Points  
- Is within 10 percentage points of HUD benchmark = 3 Points  
- Is > 10 percentage points below the local benchmark = 0 Points |
| D Length of Time Homeless (length of stay in program) | Median LOS <180 days | - Meets or exceeds local benchmark = 6 Points  
- Is within 10% (18 days of local benchmark = 6 Points  
- Is within 20% (36 days) of local benchmark = 3 Points  
- Is > 20% above local benchmark = 0 Points |
Hello,

This is a reminder that the 2018 HUD CoC NOFA Bidders' Conference is this Friday, July 20th. For more information, please see below.

EveryOne Home will be holding the 2018 HUD CoC NOFA Bidders' Conference for the Local Competition on Friday, July 20th. In addition to releasing NOFA timelines and Local Competition's instructions for renewal and new projects, EOH staff will provide further debriefing from the 2017 scores, a brief analysis on the CoC’s strengths and challenges, and this year's NOFA highlights and opportunities to apply for new projects.

As we reported on June 20th, the date the NOFA was released by HUD, we encourage potential applicants to review the Notice and find out more guidance from HUD (Click [here][1]) including its resources link: [FY 2018 Continuum of Care (CoC) Program Competition What’s New, Changes, and Highlights](https://www.hud.gov/policy/continuum_of_care/about/contcomp). Share the Notice and invite to the Bidders' Conference on July 20 colleagues and projects who may be interested in applying this year!

**Bidders' Conference (Release of Local Application)**

**Date:** July 20th, 2018  
**Time:** 1:30 to 5pm

[1]: https://mail.google.com/mail/u/1/?ui=2&ik=a8334242b6&jk=0J5TkJCB0U.6.en.*,cid=gmail_fe_180904.11_p6&view=pt&q=bidders%27s%20conference
9/11/2018

EveryOne Home Mail - Reminder: The 2018 HUD CoC NOFA Bidders' Conference is on 7/20!

Location: Oakland City Hall
1 Frank H Ogawa Plaza
Hearing Room 3
Oakland, CA 94612

Please make sure to RSVP if you plan on attending. The RSVP link is below.

Sincerely,
EveryOne Home Staff

Visit HUD CoC NOFA Page

101 Callan Ave., Suite 230.
San Leandro, CA 94577
Phone: (510) 473 8643
info@everyonehome.org

ABOUT US

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2018 HUD CoC NOFA: Frequently Asked Questions

EveryOne Home is leading the effort to end homelessness in Alameda County.

Thank you to those who have submitted questions on the 2018 Local Application. You can now download the Frequently Asked Questions on the EveryOne Home page below.

We will continue to answer questions until Tuesday, August 2nd when you email us at info@everyonehome.org.

Sincerely,
EveryOne Home Staff

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San Leandro, CA 94577
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info@everyonehome.org

ABOUT US

https://mail.google.com/mail/u/0?siad=Qmh%3A5Q-CCrm1lc.en.&cli=gmail_fe_180903.15_p8&v=pt&q=2018%20HUD%20CoC%20...
EveryOne Home INSTRUCTIONS and EVALUATION FORM for 2018 CoC RENEWAL LOCAL APPLICATION PACKAGE SUBMISSIONS

2018 CoC Renewal Local Application Instructions

2018 Local Renewal Process
EveryOne Home (EOH), Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting renewing CoC projects anticipating CoC-funds in 2018 to participate in the Local Application Package – Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its NOFA Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD NOFA is released

For further information on this Process, please refer to EveryOne Home’s 2018 Local Renewal and New Projects Review Process available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.

The United States Department of Housing and Urban Development (HUD) requires that all Project applications included in the CoC Consolidated Application be rated and ranked by the local Continuum of Care (CoC) including renewal projects, and proposed new reallocation, bonus, and Domestic Violence (DV) Bonus projects proposed. Without a Local Application, Projects cannot be scored or ranked and cannot be included in the final application package.

Previously, Renewal Project applications and Newly Proposed Project applications were combined into a single project application. As of 2018, EOH will be returning to two separate applications for renewing and new projects. These Local Application Instructions and Evaluation Form are for Renewal Projects only. Newly proposed projects are asked to complete a New Projects Local Application available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/ and should not make any submissions using this form.

New this year, EveryOne Home Staff scored Renewal Projects’ objective criteria (previously scored during the Local Application competition) during the Project Evaluation of Objective Criteria. Preliminary scores resulting from the Project Evaluation of Objective Criteria (worth up to 79 points) were released to projects on Monday, April 30, 2018 via email.

Renewal Project Local Applications will be scored on a 21-point scale in five categories:

1. Narrative for Housing First (scored by NOFA Committee) = Up to 4 points
2. Spending = Up to 5 points
3. Cost Effectiveness = Up to 2 points
4. Narrative for Quality Assurance (scored by NOFA Committee) = Up to 7 points
5. **NEW**: Consolidation of existing renewals = **3 points**
Scores to be awarded to renewal projects during the Local Application (up to 21 points possible) are cumulative with preliminary scores awarded to the Project Evaluation Package (up to 79 points) for a total of 100 points possible.

Renewal Projects may also increase Project Evaluation Preliminary scores under the following four Sections:
1. Documentation for Housing First = Up to 6 points
2. Documentation for Client Eligibility = Up to 5 points
3. Performance Outcomes = Up to 32 points
4. Fiscal Management = Up to 2 points

All Renewal Projects will be invited to submit additional or updated Housing First documents (to reflect Housing First compliance) and may increase points for this section.

All Renewal Projects that scored less than full points for certain objective criteria during the Project Evaluation may attach an Annual Performance Report (APR) or equivalent report from a more recent period than the Project Evaluation Package and may increase points under each section, as applicable.

All projects seeking to potentially increase Project Evaluation Preliminary scores must attach documentation as required on Page 6 of this Application.

In addition, all Projects will be responding to an additional question, that will not be scored in 2018, consistent with HUD requirements for the Competitive application:
1. Community and Client Engagement, including describing Projects
   * Relationships and/or MOU with schools or projects to meet children's educational needs (for family/youth projects only)
   * Whether project offers volunteer/work opportunities to clients/tenants or links them with vocational programs

New in 2018. Eligible renewal projects will have the ability to consolidate two or more projects (up to four) in one project application – without having to wait for a grant amendment to be executed to consolidate two or more grants. Applicant must consult first with HUD Field Office on whether the Project is eligible for consolidation and provide proof when submitting Local Application package. Projects with outstanding audits or findings, obligation to HUD in arrears, history of poor financial management/drawdowns, or low-occupancy and/or capacity will not be allowed to consolidate. Eligible renewals will receive 3 additional points for applying to consolidate their existing grants.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Monday, September 3, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/.

Projects renewing for the first time that are not yet under contract, which were not in operation for a full twelve months since October 1, 2016, or Projects with a start date later than October 1, 2016 and a full year of Project data have previously been provided the opportunity to elect to receive the score awarded when they applied as a
new project or submit a full application during the Project Evaluation Package. Projects that previously chose to keep their prior score do not need to make any submissions at this time.

New Joint TH and PH-RRH have previously been provided the opportunity to elect to receive the score awarded when they applied as a new project or submit a full application during the Project Evaluation Package stage. New Joint TH and PH-RRH that chose to keep their prior score do not need to make any submissions at this time.

Project types that must submit the attached Renewal Local Application Form:
- Renewing Permanent Supportive Housing (PSH),
- Renewing Transitional Housing (TH) (both youth-serving and general-use), and
- Renewing Rapid Rehousing (RRH) projects that serve homeless individuals and families, including unaccompanied youth;


**Total Funding Available:**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Annual Renewal Demand (ARD)</td>
<td>$34,329,783</td>
</tr>
<tr>
<td>Tier 1 Amount (94% ARD)</td>
<td>$32,269,996</td>
</tr>
<tr>
<td>ARD in Tier 2 (6%)</td>
<td>$2,059,787</td>
</tr>
<tr>
<td>Bonus</td>
<td>$2,059,787</td>
</tr>
<tr>
<td>Total Tier 2 (6% + Bonus)</td>
<td>$4,119,574</td>
</tr>
<tr>
<td>DV Bonus</td>
<td>$1,062,887</td>
</tr>
<tr>
<td>CoC Planning Grant</td>
<td>$1,029,893</td>
</tr>
<tr>
<td>2018 Total Submission allowed</td>
<td>$37,452,457 (does not include CoC Planning Grant)</td>
</tr>
</tbody>
</table>

Alameda County’s approved Annual Renewal Demand (ARD) = $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in bonus new projects and up to three (3) additional Domestic Violence (DV) Bonus projects funded by the 2018 new DV Bonus. The application package to HUD will also include a CoC Planning Grant, requested only by the Collaborative Applicant for CoC-related activities, which is not ranked competitively and does not affect the amount available to projects.

The total funds requested from Alameda County that are competitively scored cannot exceed the combined amounts of the ARD, bonus, and DV Bonus funds, which is currently = $37,452,457.

HUD continues to require CoCs to rank their projects in two tiers, Tier 1 and 2. Tier 2 projects are at risk of not getting funded and must compete against all other Tier 2 projects nationally. For 2018, Tier 1 is 94% of the CoCs FY 2018 Annual Renewal Demand. Tier 2 is the 6% difference between Tier 1 and the CoC’s ARD, plus any amount for the bonus. HUD will fund Tier 2 projects after it has made funding awards to all Tier 1 projects nationally. Projects will be scored on a 100-point scale based on the following:

a. CoC Score: Up to 50 points in direct proportion to the score received on the CoC Application rounded to the nearest whole point. Based on last year’s CoC score of 157.25, our Tier 2 projects would have received 39 points out of 50.
b. CoC Project Ranking: Up to 40 points for the CoCs ranking of the project. See page 16 of the NOFA for a detailed description of the formula.

c. Up to 10 points for commitment to applying the Housing First model.

Eligible Renewal Projects:
Applicants for Renewal Projects must be listed as the current grant recipient on the CoC’s 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the Grant Inventory Worksheet (GIW), please contact Riley Wilkerson at Riley.Wilkerson@acgov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant.

Projects that are not planning on renewing their CoC funding:
Projects who find mainstream funders to cover project costs with resources that are a better fit, or that determine they are unlikely to receive the minimum score in the Local Competition may elect not to submit an eligible project for renewal. Projects eligible to be renewed, but not planning on renewing CoC funding in the 2018 NOFA competition should have reported it to EveryOne Home before April 26, 2018. If you have missed this deadline and would like to withdraw your project from consideration, please notify EveryOne Home via email at info@everyonehome.org by August 17, 2018 to certify the projects’ withdrawal in writing.

The funds for projects not electing to renew will be added to the pool of available funds for reallocation to new projects. The decision not to renew is permanent. Once eliminated from the package, the same project cannot reapply in subsequent years. Only new projects created by reallocated funds or bonus funds can get added to our package in future application rounds.

Voluntary reductions of grants: Projects that have consistently underspent funds may wish to consider reducing their renewal amounts. Page 1 of the application has a space to indicate if the amount requested is less than the amount indicated on the GIW and by how much. Projects cannot request more than what is listed on the GIW.

Submission Requirements:
All project types must submit their Local Application via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed Local Application Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the Applicant and Project names.

The Local Application Package will be released on Friday, July 20, 2018. A complete submitted Package will contain: 1) a complete Local Application Form and; 2) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Projects to receive full points on a related section of the application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

| Coordinated Entry Threshold Requirements: |
| All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred |

2018 Renewals' Local Application Package | Page iv
from Coordinated Entry. All 2018 NOFA Local competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required for participation.

Required Documentation for Local Application (see Checklist under Local Application Form, Page 1):

1. Local Application Form
   i. A completed Local Application Form

2. **NEW** Consolidation
   i. Projects applying for Consolidation must attach written approval by HUD that projects are eligible for Consolidation.

3. **NEW** Community and Client Engagement: Serving the Educational Needs of children and youth (Projects serving households with children and youth only):
   i. Projects written policies, formal agreements, MOUs or partnerships with local school(s), youth education providers, early childhood providers, Head Start or other educational services to meet the educational needs of children and youth.

Required Documentation for the Project Evaluation Resubmission (see Checklist under Project Evaluation Resubmission Form, Page 6):

1. **HMIS-Based Reports**:
   i. Annual Performance Report (or equivalent report for non-HMIS providers) from date range: 10/1/2017 – Present (as applicable)

2. **Housing First Documents**:
   i. Updated or revised Resident Selection Criteria and Housing Applications; Project Participant Agreements; House Rules; Lease and sub-Leases; and/or additional Housing First documents as discussed in Housing First TA sessions (as applicable)

3. **Client Eligibility**:
   i. Updated or revised Project Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, Vet, etc.), or written procedures for verifying eligibility (as applicable)

4. **Grant and Fiscal Management**:
   i. For Audits with findings, a formal documented response by the Agency and/or funder on how they have addressed the deficiency (as applicable)

The scoring tool at the back of this application details how projects earn points in each category. The application form and the scoring tool are tightly linked. As you prepare the application, the scoring chart at the end of this Local Application can be detached and used alongside many of the sections to self-score.

**Project Scoring and Ranking:**
Projects must score a minimum of 60 points to be assured inclusion in the application package. Projects scoring below that threshold will be reallocated. Applicants are strongly encouraged to review the Local Application, and to self-score their project on the performance indicators as soon as possible to determine if they will meet the minimum score. If in self-scoring the project does not appear to meet threshold, please contact info@everyonehome.org.

In addition to the total score projects receive, reviewers may use additional factors to break ties, adjust the final ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other local
objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that may be considered include:

- the geographic and population diversity of the projects included;
- the projected impact of the loss of any residential buildings on homeless people;
- the expiration date and amount of the grant.

Download a Word version of this application from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on Page 1. Multiple PDFs for agencies with large files for backup are acceptable.

For questions regarding the completion of the Local Application, please contact EveryOne Home at info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on August 2, 2018. Questions received will be responded to in writing individually and posted to the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/ in two batches on July 31, 2018 and August 3, 2018.

**Appeals Process**
The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) **What can be appealed:** An application that
   a. Was not evaluated according to the published local NOFA process AND/OR
   b. Evaluated in a way that violates federal regulations AND
   c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all. **Note:** this includes any Project who meet Appeals Criteria #a and/or #b, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) **What is not eligible for appeal:**
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project’s scores
   d. Need for funds
   e. Appeals submitted after stated deadline


All project applications received by the deadline will be reviewed and applicants will be notified by **Friday, August 31, 2018** of their score, their initial ranking, and whether they are being included in the Consolidated Application. Ranking is subject to change according to appeals (if any) and the final ranking will be released **September 14, 2018**.

**2018 NOFA Timeline Highlights:**
- Project Evaluation Package Preliminary scores released to Projects – April 30, 2018
- Local Application released – July 20, 2018
- FAQ period begins – July 20, 2018
- FAQ period ends – August 2, 2018
• Local Application due back to EveryOne Home – August 17, 2018
• Preliminary Rating & Ranking List scores released to Projects - August 31, 2018
• Appeals Period begins - September 5, 2018
• Appeals Period ends – September 7, 2018
• Final Rating & Ranking List released to Projects - September 14, 2018
EveryOne Home LOCAL APPLICATION FORM for
2018 CoC RENEWAL LOCAL APPLICATION PACKAGE

Checklist of required documentation for projects submitting a Renewal Local Application:

Local Application Form:

☐ A completed Renewal Local Application Form

NEW Consolidation:

☐ Projects applying for Consolidation must attach written approval by HUD that projects are eligible for Consolidation.

NEW Community and Client Engagement – Serving the Educational Needs of children and youth (Projects serving households with children and youth only):

☐ Projects written policies, formal agreements, MOUs or partnerships with local school(s), youth education providers, early childhood providers, Head Start or other educational services to meet the needs of children and youth

Project Name:

Applicant Name:

1. GENERAL INFORMATION:

a. Certification of Participation in Coordinated Entry

All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred from Coordinated Entry. All 2018 NOFA Local Competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required for participation.

i. Does the Project participate in Coordinated Entry? ☐ Yes ☐ No

ii. Does the Project certify to be in compliance with Coordinated Entry or will comply with additional instructions or procedures required for Coordinated Entry participation? ☐ Yes ☐ No

b. Consolidation of Projects

Eligible renewal projects will have the ability to consolidate two or more renewals (up to 4) into one project application during the application process. Is this renewal intended to apply for Consolidation with other renewal projects? If so, please list the projects names below:

<table>
<thead>
<tr>
<th>Project Names</th>
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<tbody>
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<td></td>
</tr>
</tbody>
</table>

2018 Renewals' Local Application Package | Page 1
c. Voluntary Reduction of Funding
   i. Funding amount of application: $__
   ii. Does this amount match what is listed in the GIW? □ Yes □ No
      If no, what is the amount by which the request is being reduced? $__
   iii. If renewing for a lower amount, please describe the reasoning and how the Project will continue to be able to meet its Performance Outcomes and Targets:

2. HUD PRIORITIES (Up to 6 points):
   a. Utilizing a Housing First Approach Narrative (up to 4 points)
      For this section scoring will be based on project response to the Narrative Prompts below. HUD defines Housing First as, “a model of housing assistance, that prioritizes rapid placement and stabilization in permanent housing that does not have services participation requirements or preconditions (such as sobriety or a minimum income threshold). Transitional housing and supportive services-only projects are considered to be using a Housing First model if they operate with low barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and, for transitional housing projects, do not require any preconditions for Moving into the transitional housing (e.g. sobriety or minimum income threshold) (2018 NOFA, Page 18).”

   Please respond succinctly to the three questions below. If your project has recently changed any documentation or practices to be concordant with Housing First mandates, add a brief description to the Narrative. Projects can utilize the Appendix B: 2018 Housing First Checklist available for download on the Everyone Home website at http://everyonehome.org/our-work/hud-coo-nofa/ as guidance.

   1) Describe how this Project is low-barrier and whether preconditions to entry are required – such as requiring sobriety or minimum-income.
   2) How are services voluntary, and how does the Project prioritize engagement and problem-solving over therapeutic goals?
   3) How does the Project prioritize rapid placement and stabilization in permanent housing? Describe how eviction back into homelessness is avoided.
b. Cost Effectiveness (up to 2 points):
Use the formula below to calculate Actual cost per year of housing retention or cost per permanent housing exit for existing projects using an APR run for the federal fiscal year October 1, 2016 – September 30, 2017.

Projects will be scored by comparing their cost per outcome to the average cost of their: 1) primary activity type; 2) site-based vs. scattered site for PSH housing and services and PSH housing only. (ex. Scattered site PSH-housing only will be compared to the average for Scattered site PSH-housing)

Cost per Outcome:

i. Number of persons who exited to permanent housing in 2017 (APR Q 23.a + 23.b)

or

ii. Number of persons who retained permanent housing in 2017 (APR Q 22.a.1)

Total project budget (HUD dollars + match) = $_______ / Total # from i. or ii. above _________ = cost per outcome

3. GRANT MANAGEMENT (Up to 5 points)
a. Spending (up to 5 points):
Scoring for this session will be based on the Project’s ability to spend down last year’s grant. To earn maximum points, the expectation is that all HUD CoC funded projects spend 95% or more of its CoC funds in its last grant year.

i. Did the Project spend 95% or more of the grant last year?
   □ Yes  □ No

ii. Please complete the following chart

<table>
<thead>
<tr>
<th>Unspent funds</th>
<th>Dates of grant year</th>
<th>Amount of Total Grant awarded</th>
<th>Amount unspent and returned</th>
<th>Percent (%) of grant award unspent (Amount unspent/Total Grant)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Most recently completed grant year</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2018 Renewals’ Local Application Package | Page 3
### 3. Previous Year

<table>
<thead>
<tr>
<th>Year</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 years previous</td>
<td></td>
</tr>
</tbody>
</table>

iii. If there were extraordinary circumstances unique to your project which account for unexpended funds, briefly explain and provide detailed strategies/measures taken to reduce under-spending in the future.

### 4. ORGANIZATIONAL CAPACITY (Up to 7 points):

a. Quality Assurance Narrative (up to 7 points)

Scoring for this section will be based on Project's response to the Narrative questions below. Please use the space provided to:

1. Describe how consumer satisfaction, and program performance are assessed.
2. How is data and client feedback used in program planning, implementation, and management?
3. Explain how staff is trained and managed to ensure a high quality of care.

### 5. NEW QUESTION (NOT SCORED IN 2018):

a. Community and Client Engagement

New in 2018, this question will not be scored. If including attachments for educational services, use appropriate boxes below to indicate Document Name, File/Attachment Names, and Page numbers. HUD considers ensuring the educational needs of children and assisting participants in increasing income, self-sufficiency, and independence a priority. Using the Narrative box below, please describe:
1) How your Project serves children and youth educational needs (*Projects serving children and youth only*), and include under Required Attachments any written policies, MOU or other informal agreement with local schools that support school-aged children; and/or

2) How your Project serves the educational and job-training needs of adult participants, including whether Project offers volunteer and/or work opportunities to clients/tenants and/or links them with educational and vocational programs to support self-sufficiency and income growth.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If your project is NOT resubmitting documentation to increase Project Evaluation Preliminary Scores, STOP. You are finished. Make a PDF of this form and send it to EveryOne Home at info@everyonehome.org.

If you ARE resubmitting documentation to increase Project Evaluation Preliminary Scores CONTINUE TO NEXT PAGE.
EveryOne Home PROJECT EVALUATION RESUBMISSION FORM for
2018 CoC RENEWAL LOCAL APPLICATION ADDITIONAL DOCUMENTATION RESUBMISSION

New this year, EveryOne Home Staff scored Renewal Projects' objective criteria (previously scored during the Local Application competition) during the Project Evaluation of Objective Criteria. All Renewal Projects that scored less than full points for certain objective criteria can attach additional documentation to the Project Evaluation Package and may increase points under each section, as applicable. For a list of appropriate documentation for each section, please see following Checklist of required documentation.

Renewal Projects may increase Project Evaluation Preliminary scores in the following four categories:
1. Documentation for Housing First = Up to 6 points
2. Documentation for Client Eligibility = Up to 5 points
3. Performance Outcomes = Up to 32 points
4. Fiscal Management = Up to 2 points

Checklist of required documentation for projects resubmitting the Project Evaluation Package:

HMIS-based Reports:
☐ Annual Performance Report (or equivalent report for non-HMIS providers) from date range: 10/1/2017 – Present (as applicable)

Housing First Documents:
☐ Updated or revised Resident Selection Criteria and Housing Applications; Project Participant Agreements; House Rules; Lease and sub-Leases; and/or other additional Housing First documents as discussed in Housing First TA sessions (as applicable)

Client Eligibility:
☐ Updated or revised Project Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, Vet, etc.), or written procedures for verifying eligibility (as applicable)

Grant and Fiscal Management:
☐ For Audits with findings, formal documented response by the Agency and/or funder on how they have addressed the deficiency (as applicable)
1. HUD PRIORITIES:
   a. Utilizing a Housing First Approach Documentation
      Scoring for this section will be based on a review of documentation which demonstrates projects continued
      commitment to Housing First principles through revised, updated or additional documentation post Project
      Evaluation Package preliminary scoring. NOTE: Documentation which is identical and previously submitted
      during the Project Evaluation Package will not be considered for additional points. All Renewal Projects can
      submit updated or revised Housing First documents (ex. Housing Application, Participant Agreement, Lease or
      sub-Lease, and/or House Rules) or other additional Housing First documents as discussed in Housing First TA
      sessions and may increase points for this section. Use the Narrative space provided to briefly describe revisions
      or changes to Housing First documents. Use appropriate boxes below to indicate Document Name, File/Attachment
      Name, and Page numbers which refer to any updated/revised or additional Housing First related policies and
      procedures.

      | Document Name | File/Attachment Name | Page Number(s) |
      |---------------|----------------------|----------------|
      |               |                      |                |
      |               |                      |                |
      |               |                      |                |
      |               |                      |                |
      |               |                      |                |

   b. Client Eligibility Documentation
      For this section, scoring will be based on a review of documentation revised post Project Evaluation Package
      preliminary scoring. NOTE: Documentation which is: 1) identical to, or; 2) dated older than those submitted
      during the Project Evaluation Package will not be considered for additional points. All Renewal Projects can
      submit updated or revised Client Eligibility documentation (ex. Housing Application, Participant Agreement,
      Agency Policy & Procedures Manual) and may increase points for this section. Use the Narrative space provided
      to briefly describe revisions or changes to Client Eligibility documents. In appropriate boxes below to indicate
      Document Name, File/Attachment Name, and Page numbers which refer to any updated/revised Client Eligibility
      related policies and procedures.
2. OUTCOME PERFORMANCE:
   a. Performance Outcomes Narrative
For this section, scoring will be based on a review of APRs (or equivalent report if a non-HMIS provider) along with a brief narrative. **Narrative must be accompanied by an updated APR or equivalent report showing improved outcomes to be considered for additional points.** Projects who scored less than full points for the following Performance Outcomes can attach an APR (or equivalent report) from a more recent period than the Project Evaluation Package and may increase points under the Sections listed below. Use appropriate boxes below to indicate Document Name, File/Attachment Names, and Page numbers.
   - **Outcome A**
     - PSH: Retains and/or exits to Permanent Housing > 12 months
     - RRH, TH, TAY-TH: Obtains Permanent Housing
   - **Outcome B**
     - All Project Types: Adults who Maintain or increase income
   - **Outcome C**
     - All Project Types: Obtains/Maintains non-cash mainstream benefits
   - **Outcome D**
     - PSH, RRH, TAY-TH: Exits/Returns to Homelessness
     - TH: Length of Time Homeless
3. ORGANIZATIONAL CAPACITY:
   a. Fiscal Management—Grantees only (up to 2 Points)

Projects who scored low under this Section due to Audit findings in the Project Evaluation stage may increase their score by up to 2 points if they submit documentation that the finding has been resolved. Documentation of a sufficient resolution includes a documented, formal response by the Agency and/or funder on how they have addressed the deficiency. In the space below briefly explain both the finding and resolution. Use the appropriate boxes to indicate Document Name, File/Attachment Name, and Page numbers which refer to formal response.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

**Congratulations! You are finished.**
Make a PDF of this form and send it to EveryOne Home at info@everyonehome.org.
## NOFA LOCAL APPLICATION Scoring Tool - Renewal Projects
**Total Points available = up to 21 Points**

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Project addresses Local and HUD Priorities = up to 6 Points</td>
<td></td>
</tr>
<tr>
<td>1.a Housing First narrative = 4 Points as determined by application scorers.</td>
<td></td>
</tr>
<tr>
<td>Points will be cumulative up to 10 points for this section when combined with the Project Evaluation Package.</td>
<td></td>
</tr>
<tr>
<td>Housing First Narrative Questions = up to 4 Points as determined by application scorers following Housing First Checklist (Principles: low barrier and no preconditions to entry; voluntary services and prioritizing engagement and problem-solving over therapeutic goals; and rapid placement and stabilization in permanent housing).</td>
<td></td>
</tr>
<tr>
<td>1.b Cost Effectiveness = 2 points</td>
<td></td>
</tr>
<tr>
<td>Projects 100% dedicated to chronically homeless since inception or currently serving at least 50% chronically homeless adults average cost per outcome is 60% or less above average for comparable projects in package = 2 Points</td>
<td></td>
</tr>
<tr>
<td>Project's average cost per outcome is 25% or less above average of comparable projects in package = 2 Points</td>
<td></td>
</tr>
<tr>
<td>Project's average annual cost per outcome is 26% or more above average of comparable projects in package = 0 Points</td>
<td></td>
</tr>
<tr>
<td><strong>2</strong> Grant Management = up to 5 Points</td>
<td></td>
</tr>
<tr>
<td>2.a Spending = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>Existing project spent 100-95% of funds in the last grant year = 5 Points</td>
<td></td>
</tr>
<tr>
<td>Existing project spent 94% or less of funds in the last grant year and provided a reasonable explanation (as determined by application scorers) = up to 3 Points</td>
<td></td>
</tr>
<tr>
<td>Existing project spent 94% or less of funds in the last grant year = 0 Points</td>
<td></td>
</tr>
<tr>
<td><strong>3</strong> Organizational Capacity = up to 7 points</td>
<td></td>
</tr>
<tr>
<td>3.a Quality Assurance = 7 Points as determined by application scorers.</td>
<td></td>
</tr>
<tr>
<td>Existing project will be scored a maximum of 7 points for their Quality Assurance narrative as determined by application scorers.</td>
<td></td>
</tr>
<tr>
<td><strong>4</strong> Consolidation = 3 points</td>
<td></td>
</tr>
<tr>
<td>Project is applying to consolidate programs = 3 points</td>
<td></td>
</tr>
</tbody>
</table>
**NOFA PROJECT EVALUATION Resubmission Scoring Tool - Renewal Projects**

**Total Points originally available = up to 79 Points**

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Project Cover Sheet = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>1.a Primary Activity type = 5 Points maximum</td>
<td></td>
</tr>
<tr>
<td>- Existing Permanent Housing (PSH &amp; RRH) and Youth-Serving TH = 5 Points</td>
<td></td>
</tr>
<tr>
<td>- General use (non-youth serving) Transitional Housing = 3 Points</td>
<td></td>
</tr>
<tr>
<td>2. Project addresses Local and HUD Priorities = 16 Points maximum</td>
<td></td>
</tr>
<tr>
<td>2.a Target populations and severity of need = (up to 10 points)</td>
<td></td>
</tr>
</tbody>
</table>

*Check any boxes that are true and can be verified by back up documentation. Project will receive the score from the highest single point value that can be verified, section is not cumulative.*

- Provides PSH to 100% of chronically homeless households as evidenced by EveryOne Home HUD CoC APR Tool = **10 Points**
- Provides PSH which became DedicatedPLUS in 2017 = **9 Points**
- Provides PSH and fills 100% of turnover with chronically homeless households as evidenced by EveryOne Home HUD Target Population Report tool = **8 Points**
- Provides Rapid Rehousing to families, individuals and/or transition aged youth as evidenced by APR = **8 Points**
- Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = **6 Points**
- Serves transition aged youth as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = **3 Points**
- Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 80% plus of heads of household in this category = **6 Points**
- Serves veterans as evidenced by EveryOne Home HUD Target Population Report tool showing 50% plus of heads of household in this category = **3 Points**
- EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of households entered project from the streets or other places not meant for human habitation = **8 Points**
- EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of households entered project from the streets or other places not meant for human habitation = **4 Points**
- EveryOne Home HUD Target Population Report tool demonstrates that 75% or more of households are fleeing domestic violence and/or human trafficking = **6 Points**
- EveryOne Home HUD Target Population Report tool demonstrates that 50% or more of households are fleeing domestic violence and/or human trafficking = **3 Points**
2.b Housing First and Low Barrier documentation = 6 Points maximum if documents demonstrate adherence to specific Housing First principles. 
*All applicable boxes can be checked and points will be cumulative up to 10 points for this section when combined with the Local Application Package.*

- Eligibility Criteria/Housing Application provided for renewing projects, demonstrate low barriers to entry and no preconditions. To earn maximum points in this section, documents must demonstrate project does not reject individuals and families with criminal histories = **2 Points**

- Participant Agreement, Lease, and/or House Rules provided for renewing projects, demonstrate voluntary participation in services and prioritizing engagement and problem-solving over therapeutic goals = **2 Points**

- Participant Agreement, Lease, and/or House Rules provided for renewing projects, demonstrate project prioritizes rapid placement and stabilization in permanent housing including showing eviction back to homelessness is avoided = **2 Points**

<table>
<thead>
<tr>
<th>3</th>
<th>Outcome Performance = 32 Points maximum</th>
</tr>
</thead>
</table>

3.a APR Performance Outcomes A-D = 32 Points maximum

- If Applicant has an APR or equivalent report from a more recent time period than the Project Evaluation Package which shows improved performance, reviewers may award up to full points for specific performance outcome(s).

<table>
<thead>
<tr>
<th>4</th>
<th>Grant Management = up to 20 Points maximum</th>
</tr>
</thead>
</table>

See Sector Specific Benchmarks and Self Scoring Charts on the following pages.
<table>
<thead>
<tr>
<th>4.a Reports and Invoicing = 10 points maximum</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Project provided evidence of on time submission of APRs and quarterly LOCCS draws for the last two grant cycles or for as long as the project has operated if less than three years old = 10 Points</td>
<td></td>
</tr>
<tr>
<td>Project provided evidence of on-time submission of APRs and quarterly LOCCS draws for the last two grant cycles or for as long as the project has operated if less than three years old, at least 75% of time = 5 Points</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4.b Capacity and Utilization = 5 points maximum</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>The project was fully utilized (100%) during the program year, as evidenced by the EOH APR Tool = 5 Points</td>
<td></td>
</tr>
<tr>
<td>The existing project was utilized to 90-99% during the program year, as evidenced by the EOH APR Tool = 4 Points</td>
<td></td>
</tr>
<tr>
<td>The project was utilized to 80-89% during the program year, as evidenced by the EOH APR Tool = 2 Points</td>
<td></td>
</tr>
<tr>
<td>The project was utilized at less than 80% for the program year, as evidenced by the EOH APR Tool = 0 Points</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4.c Client Eligibility = 5 points maximum</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Project’s written policy clearly describes client eligibility requirements and funding sources (i.e. eligibility requirements for mental health funding contracts), and requirements are consistent with specific project eligibility information provided to Coordinated Entry/HomeStretch = 2 Points</td>
<td></td>
</tr>
<tr>
<td>Project has clear, written procedures for verification of client eligibility and homeless history, in addition to proof of referrals from Coordinated Entry/HomeStretch (i.e., CE HUB provided verification documentation, staff verification of 3rd party documentation, etc.) = 3 Points</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5 Organizational Capacity = 6 points maximum for entire section</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>5.a HMIS Data Completeness Report Card = 2 Points maximum</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Exiting project’s data quality score is greater than or equal to 95%, as evidenced by the EOH APR Tool = 2 Points</td>
<td></td>
</tr>
<tr>
<td>Greater than or equal to 90% and below 95%, as evidenced by the EOH APR Tool = 1 Point</td>
<td></td>
</tr>
<tr>
<td>Below 90%, as evidenced by the EOH APR Tool = 0 Points</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5.b Fiscal Management = 4 points maximum</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>If Applicant has documentation of formal response by the Agency and/or funder’s which show findings or areas of concern have been addressed, reviewers may award 2 points under this section.</td>
<td></td>
</tr>
<tr>
<td>Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2016, that shows no findings or areas of concern in the management letter. = 4 Points</td>
<td></td>
</tr>
<tr>
<td>Existing projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2015, that does show findings or areas of concern in the management letter. = 0 Points</td>
<td></td>
</tr>
</tbody>
</table>

2018 Renewals’ Local Application Package | Page 13
## 2018 Scoring for Outcome Measures, by Sector

### 1. Permanent Supportive Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
</table>
| A | Retains and/or exits to other Permanent Housing > 12 months | 95% | ☐ Meets or exceeds local benchmark in an existing project = **10 Points**  
☐ Is within 5 percentage points of the local benchmark in existing project = **8 Points**  
☐ Is within 10 percentage points of the local benchmark within an existing project = **4 Points**  
☐ Is > 10 percentage points below the local benchmark = **0 Points** |
| B | Adults who maintain or increase income | 50% of leavers and stayers | ☐ Meets or exceeds local benchmark in existing project = **7 Points**  
☐ Is within 5 percentage points of local benchmark in existing project = **5 Points**  
☐ Is within 10 percentage points of local benchmark in existing project = **3 Points**  
☐ Is > 10 percentage points below the local benchmark in existing project = **0 Points** |
| C | Obtains/ maintains non-cash mainstream benefits | 56% leavers and stayers | ☐ Meets or exceeds local benchmark in existing project = **7 Points**  
☐ Is within 5 percentage points of local benchmark in existing project = **5 Points**  
☐ Is within 10 percentage points of local benchmark in existing project = **3 Points**  
☐ Is > 10 percentage points below the local benchmark in existing project = **0 Points** |
| D | Exits to Homelessness | Approx. 10% of total bed capacity | ☐ Meets or exceeds local benchmark in existing project = **8 Points**  
☐ Is within 1 exit of local benchmark in existing project = **6 Points**  
☐ Is within 2 exits of local benchmark in existing project = **3 Points**  
☐ Is 3 or more exits above the local benchmark in existing project = **0 Points** |

### Reference Table for PSH Outcome Measure D

<table>
<thead>
<tr>
<th>Total Bed Capacity in Program</th>
<th>Benchmark Number of Exits to Homelessness (Approx. 10% of bed capacity)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-14</td>
<td>1</td>
</tr>
<tr>
<td>15-24</td>
<td>2</td>
</tr>
<tr>
<td>25-34</td>
<td>3</td>
</tr>
<tr>
<td>35-44</td>
<td>4</td>
</tr>
<tr>
<td>45-54</td>
<td>5</td>
</tr>
<tr>
<td>55-64</td>
<td>6</td>
</tr>
<tr>
<td>65-74</td>
<td>7</td>
</tr>
<tr>
<td>75-84</td>
<td>8</td>
</tr>
<tr>
<td>85-94</td>
<td>9</td>
</tr>
<tr>
<td>95-104</td>
<td>10</td>
</tr>
<tr>
<td>105-124</td>
<td>12</td>
</tr>
<tr>
<td>125+</td>
<td>18</td>
</tr>
</tbody>
</table>
## 2. Rapid Rehousing, Youth Serving Transitional Housing and Joint TH and PH-RRH

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A</strong> Obtains Permanent Housing</td>
<td>80%</td>
<td>- Meets or exceeds local benchmark in an existing project = 10 Points &lt;br&gt; - Is within 5 percentage points of the local benchmark in existing project = 8 Points &lt;br&gt; - Is within 10 percentage points of the local benchmark within an existing project = 4 Points &lt;br&gt; - Is &gt; 10 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td><strong>B</strong> Adults who Increase Income</td>
<td>30% of leavers and stayers</td>
<td>- Meets or exceeds local benchmark in existing project = 7 Points &lt;br&gt; - Is within 5 percentage points of the local benchmark in existing project = 5 Points &lt;br&gt; - Is within 10 percentage points of the local benchmark in existing project = 3 Points &lt;br&gt; - Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td><strong>C</strong> Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td>- Meets or exceeds local benchmark in existing project = 7 Points &lt;br&gt; - Is within 5 percentage points of the local benchmark in existing project = 5 Points &lt;br&gt; - Is within 10 percentage points of the local benchmark in existing project = 3 Points &lt;br&gt; - Is &gt; 10 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
<tr>
<td><strong>D</strong> Returns to Homelessness</td>
<td>&lt;10%</td>
<td>- Meets or exceeds local benchmark in existing project = 8 Points &lt;br&gt; - Is within 5 percentage points of the local benchmark in existing project = 6 Points &lt;br&gt; - Is within 8 percentage points of the local benchmark in existing project = 3 Points &lt;br&gt; - Is &gt;8 percentage points below the local benchmark in existing project = 0 Points</td>
</tr>
</tbody>
</table>
EveryOne Home INSTRUCTIONS and EVALUATION FORM for 2018 CoC NEW PROJECTS LOCAL APPLICATION PACKAGE SUBMISSIONS

2018 CoC New Projects Local Application Instructions

2018 New Projects Review Process

EveryOne Home, Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting projects anticipating CoC-funds to participate in the 2018 New Projects Local Application - Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its Local Application into three Stages:

- Stage 1 - Renewals’ Project Evaluation of Objective Criteria
- Stage 2 - Project Monitoring TA/Site Visits for low scoring projects or upon request
- Stage 3 - Local Application for New and Renewal Projects after HUD CoC NOFA is released

For further information on this Process, please refer to the EveryOne Home’s 2018 Local Renewal and New Projects Review Process (available for download on the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/).

The United States Department of Housing and Urban Development (HUD) requires that all local project applications included in the CoC Consolidated Application be rated and ranked, including renewal projects, and proposed new projects created with reallocation, bonus, and Domestic Violence Bonus funds. Without a local application, projects cannot be scored or ranked and cannot be included in the final application package submitted to HUD.

Previously, Renewal Project applications and New Projects applications were combined into a single project application. As of 2018, EveryOne Home will be returning to two separate applications for renewing and new projects. These Local Application Instructions and Evaluation Form are for New Projects only.

Total Funding Available:

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Annual Renewal Demand (ARD)</td>
<td>$34,329,783</td>
</tr>
<tr>
<td>Tier 1 Amount (94% ARD)</td>
<td>$32,269,996</td>
</tr>
<tr>
<td>ARD in Tier 2 (6%)</td>
<td>$2,059,787</td>
</tr>
<tr>
<td>Bonus</td>
<td>$2,059,787</td>
</tr>
<tr>
<td>Total Tier 2 (6% + Bonus)</td>
<td>$4,119,574</td>
</tr>
<tr>
<td>DV Bonus</td>
<td>$1,062,887</td>
</tr>
<tr>
<td>CoC Planning Grant</td>
<td>$1,029,893</td>
</tr>
<tr>
<td>2018 Total Submission allowed</td>
<td>$37,452,457 (does not include CoC Planning Grant)</td>
</tr>
</tbody>
</table>

Alameda County’s 2018 approved Annual Renewal Demand (ARD) is $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in Bonus funds for one or more eligible project components. New in 2018, our CoC may apply for up to $1,062,887 for up to three (3) Domestic Violence Bonus projects (DV Bonus) to provide housing and services to survivors of domestic violence, dating violence, human trafficking and stalking. The application package will also include a CoC Planning Grant of up to $1,029,893. The CoC Planning grant, requested only by the Collaborative Applicant for CoC-related activities, is not ranked competitively and does not affect the amount available to projects.
3. General (non-youth serving) Transitional Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtains Permanent Housing</td>
<td>80%</td>
<td>▶️ Meets or exceeds local benchmark = 10 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 5 percentage points of the local benchmark = 8 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 10 percentage points of the local benchmark = 4 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is &gt; 10 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td>B Adults who maintain or increase income</td>
<td>50% of leavers and stayers</td>
<td>▶️ Meets or exceeds local benchmark = 7 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 10 percentage points of local benchmark = 6 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 15 percentage points of local benchmark = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is &gt; 15 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td>C Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td>▶️ Meets or exceeds HUD benchmark = 7 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 5 percentage points of HUD benchmark = 6 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 10 percentage points of HUD benchmark = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is &gt; 10 percentage points below the local benchmark = 0 Points</td>
</tr>
<tr>
<td>D Length of Time Homeless (length of stay in program)</td>
<td>Median LOS &lt;180 days</td>
<td>▶️ Meets or exceeds local benchmark = 8 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 10% (18 days) of local benchmark = 6 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is within 20% (36 days) of local benchmark = 3 Points</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▶️ Is &gt; 20% above local benchmark = 0 Points</td>
</tr>
</tbody>
</table>
2018 New Projects Review Process
EveryOne Home, Alameda County’s Continuum of Care (CoC) Lead Agency, is inviting projects anticipating CoC-funds to participate in the 2018 New Projects Local Application - Stage 3 of the 2018 Notice of Funding Availability (NOFA) Local Renewal and New Projects Review Process. For the 2018 Process, EveryOne Home has divided its Local Application into three stages:
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The United States Department of Housing and Urban Development (HUD) requires that all local project applications included in the CoC Consolidated Application be rated and ranked, including renewal projects, and proposed new projects created with reallocation, bonus, and Domestic Violence Bonus funds. Without a local application, projects cannot be scored or ranked and cannot be included in the final application package submitted to HUD.

Previously, Renewal Project applications and New Projects applications were combined into a single project application. As of 2018, EveryOne Home will be returning to two separate applications for renewing and new projects. These Local Application Instructions and Evaluation Form are for New Projects only.

Total Funding Available:
- Total Annual Renewal Demand (ARD) = $34,329,783
- Tier 1 Amount (94% ARD) = $32,269,996
- ARD in Tier 2 (6%) = $2,059,787
- Bonus = $2,059,787
- Total Tier 2 (6% + Bonus) = $4,119,574
- DV Bonus = $1,062,887
- CoC Planning Grant = $1,029,893
- 2018 Total Submission allowed = $37,452,457 (does not include CoC Planning Grant)

Alameda County’s 2018 approved Annual Renewal Demand (ARD) is $34,329,783. The CoC can submit renewing and reallocated projects for up to that amount plus an additional $2,059,787 in Bonus funds for one or more eligible project components. New in 2018, our CoC may apply for up to $1,062,887 for up to three (3) Domestic Violence Bonus projects (DV Bonus) to provide housing and services to survivors of domestic violence, dating violence, human trafficking and stalking. The application package will also include a CoC Planning Grant of up to $1,029,893. The CoC Planning grant, requested only by the Collaborative Applicant for CoC-related activities, is not ranked competitively and does not affect the amount available to projects.
The total funds requested from Alameda County that are competitively scored (excluding the CoC Planning Grant) cannot exceed the combined amounts of the ARD and the Bonus and DV funds, which is equals $37,452,457.

Project types eligible for New Projects Local Application
* New Permanent Supportive Housing (PSH) where 100% of the beds are dedicated to serve chronically homeless individuals, households with children, including unaccompanied youth and/or Projects designated as DedicatedPLUS (DDP)
* New Rapid Rehousing (RRH) for individuals and families, including unaccompanied youth
* New Joint Transitional Housing and Permanent Housing and Rapid Rehousing component (Joint TH and PH-RRH)
* New Homeless Management Information System Project
* New Support Services Only for Coordinated Entry to develop or operate a Centralized or Coordinated Assessment System (SSO-CE)
* For New Domestic Violence Bonus Projects to provide housing and services to domestic violence, dating violence, stalking and trafficking survivors:
  * New Rapid Rehousing (RRH)
  * New Joint Transitional Housing and Permanent Housing and Rapid Rehousing component (Joint TH and PH-RRH) to better serve individuals and families, including individuals and families fleeing or attempting to flee DV, dating violence, sexual assault, stalking and trafficking.
  * New Supportive Services Only for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, human trafficking, or stalking (i.e., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers).

Eligible Applicants
To apply for a new project, Applicants must be a non-profit or entity of local government that operates a:
1) **CoC funded Renewal Project** listed as the current grant recipients on the CoC's 2017 Grant Inventory Worksheet approved by HUD. Eligible projects for renewal must have an existing contract or expect to be under contract by December 31, 2018 for funds awarded in a previous application round. If you have a question about whether you are listed in the GIW, please contact Riley Wilkerson at Riley.Wilkerson@gov.org from Alameda County Department of Housing and Community Development, which functions as the CoC Collaborative Applicant; or
2) **Non-CoC funded existing Projects** seeking to expand existing operations for eligible new project types (PH-PSH; PH-RRH; Joint TH and PH-RRH) or to provide a new DV Bonus project under eligible new DV Bonus project types (PH-RRH, Joint TH and PH-RRH, and SSO Projects for Coordinated Entry to implement policies, procedures, and practices for Coordinated Entry (CE)) to better meet the need of survivors of DV, dating violence, sexual assault, or stalking. **Project applicants cannot use CoC program funds to replace state and local funds.**
   a. **Non CoC funded Projects** must demonstrate capacity and appropriate qualifications, including prior experience managing projects and performing activities like those proposed in the application, prior performance on relevant grants, and experience in utilizing government funds. For DV Bonus Projects, Applicants must demonstrate **experience** in serving survivors of domestic violence, dating violence, sexual assault, stalking, and trafficking, and ability to house survivors and meet safety outcomes. For those applying for SSO Projects for Coordinated Entry.
Applicants must also demonstrate prior experience providing services to DV survivors and expertise in policy and training in the fields of domestic violence, sexual assault and/or trafficking.

New Projects Creation:
Applicants may apply for new projects through:

A. Reallocation and Bonus for Conversion/Expansion of current operations:

The CoC welcomes voluntary reallocation of HUD funds that strengthens our system and application package and is aligned with our guiding principles.

- **Reallocation:** CoC funded renewal projects may apply to reallocate an existing project into a new eligible project type (such as from TH to PH-RRH). The process requires the elimination of the existing renewal.
  - **Transition Grants (new in 2018):** Applicants seeking to reallocate an existing renewal project may apply as a Transition grant (NOFA, Page 20). Up to 50% of each transition grant may be used for costs of eligible activities of the program component originally funded. Project will have one year to fully transition from the original component to the new component and this will take place during the transition grants normal year and must have the consent of the Continuum of Care (CoC). Projects using Consolidation of existing projects cannot apply for Transition grants (NOFA, Page 1).

- **Bonus:** The CoC is also inviting CoC-funded and non-CoC program funded projects seeking expansion of current operations to apply as new Bonus projects (NOFA, Page 17).
  - **Expansion:** Applicants (CoC funded and non CoC-funded) may submit a new project application to expand current operations to add units, beds, persons served, and services provided to existing participants, or in the case of HMIS, increase the current HMIS grant activities. Non-CoC project applicants may request CoC program funds to add to a current project funded from sources other than CoC funds, except to replace state or local funds.

B. New Domestic Violence (DV) Bonus Projects (new in 2018)

HUD added up to $50 million in DV Bonus to provide housing and services to survivors of domestic violence, dating violence, sexual assault and stalking. As stated above, $1,062,887 is available for the CoC to select up to three (3) DV Bonus Projects. The CoC will select and include in its package submission one project application per project type as required by HUD. Applicants can submit a new project application for the following project types:

1. Permanent Housing-Rapid Rehousing (PH-RRH) projects that follow a Housing First approach
2. Joint TH and PH-RRH projects (TH and PH-RRH) that follow a Housing First approach
3. SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, or stalking (e.g., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers).

Applicants may apply to expand an existing CoC funded renewal project not dedicated to DV survivors and dedicate additional units, beds, persons served, or services provided for this population. The DV
Bonus Projects will be ranked on the new Project Listing of the CoC Priority Listing with a unique rank number.

Scoring of New Project Applications
New Project applications will be scored on a 100-point scale in five categories:
1. Primary Activity Type = Up to 5 points
2. How Project Addresses Local and HUD Priorities = Up to 25 points
3. Outcome Performance = Up to 32 points
4. Grant Management = Up to 20 points
5. Organization Capacity = Up to 18 points

In addition, Projects will be responding to an additional question, that will not be scored in 2018:
1. Community and Client Engagement, including describing Projects:
   - Relationships and/or MOU with schools or projects to meet children’s educational needs (for family/youth projects)
   - Whether project offers volunteer/work opportunities to clients/tenants or links them with vocational programs.

The Local Application due date: Friday, August 17, 2018 by 5pm via email to info@everyonehome.org.

The results of the local Rating and Ranking process will be announced on Monday, September 3, 2018. If changes to the Rating and Ranking List are necessitated by the results of the Appeals Process, they will be announced on Friday, September 14, 2018 and published on the EveryOne Home website.

Appeals Process
The NOFA Committee has developed a formal appeal process for the HUD CoC NOFA local competition, which was approved by the HUD CoC Committee on June 20, 2017.

1) What can be appealed: An application that
   a. Was not evaluated according to the published local NOFA process AND/OR
   b. Evaluated in a way that violates federal regulations AND
   c. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all. Note: this includes any Project who meet Appeals Criteria #1 and/or #2, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 because of scoring post appeals.

2) What is not eligible for appeal:
   a. Errors or omissions by project Applicants
   b. Projects that do not meet threshold
   c. Dissatisfaction with Project’s scores
   d. Need for funds
   e. Appeals submitted after stated deadline

Submission Requirements:
All project types must submit their Local Application Package response via email to EveryOne Home at info@everyonehome.org, by 5pm, August 17, 2018. In addition to the completed New Projects Local Application Form, Grantees must include copies of all required back up documentation as a PDF. The file name for the attachment document should reflect the applicant and Project names.

The Local Application Package will be released on Friday, July 20, 2018. A complete submitted Package will contain: 1) A completed Cover Sheet; 2) a complete New Projects Local Application Form; 3) any required supporting materials and documentation (refer to Required Documentation list below).

Supporting materials and documentation may be submitted as a single PDF attachment. All items described below are required to be attached for Projects to receive full points on a related section of the Application. There is also a checklist included with the Form which can be utilized to ensure that all relevant items are enclosed.

Coordinated Entry Threshold Requirement:
All Grantees who receive HUD CoC funding are required to participate in Coordinated Entry, meaning that Projects must notify their Coordinated Entry lead of all openings and fill those openings with participants referred from Coordinated Entry. All 2018 NOFA Local competition applicants are required to certify they are aware of this expectation and are already complying or will comply with any additional instructions or procedures required by participation.

Required Documentation (see Checklist under New Projects Local Application Form, Pages 1 through 2):
1. Homeless Management Information System (HMIS) or comparable Reports (Reports should be from October 1, 2016 – September 30, 2017):
   a. Applicants proposing new projects can submit up to 2 APRs
      - If expanding an existing CoC funded project to a different population, including DV survivors, the existing project APR and an APR (or appropriate reports from a comparable data base) from a project serving the proposed population must be included.
      - If converting to a different project type, include APR for existing program and an APR (or appropriate reports from a comparable data base) from the program type being proposed
      - If applicant is not an HMIS user, attach appropriate reports from a comparable data base.
      Contact EveryOne Home via email at info@everyonehome.org if you have questions about which reports in your data base to attach.

2. Housing First Documentation
   CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.
   a. Applicants proposing new projects must submit documentation consistent with Housing First principles (please refer to Appendix B – Housing First Checklist at EveryOne Home’s website at http://everyonehome.org/our-work/hud-coc-nofa/) 
      - If proposing to serve a different population that modifies the Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules, the new or proposed housing first documentation must be submitted.
• If converting to a different project type, include existing or proposed housing first documentation, including Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules.

• If applicant not CoC funded, include documentation that shows implementation of housing first principles in a comparable program, including Resident Selection Criteria/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules. Contact EveryOne Home via email at info@everyonehome.org if you have questions about appropriate documents to attach.

3. Client Eligibility:
   CoC funded projects proposing to expand existing renewal projects serving the same population with the same activities do not need to submit documents in this section.
   a. Applicants must submit documentation of client eligibility and verification of eligibility.
      • If proposing to serve a different population that modifies the client eligibility and/or verification of eligibility, documentation must be submitted.
      • If converting to a different project type, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children, etc.), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. HCPWA or MHSA require specific disabilities).
      • If applicant not CoC funded, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children; individuals and families fleeing domestic violence), and written procedures for verifying eligibility. If eligibility extends beyond literally and/or chronically homeless and household type (singles vs. families), provide evidence that criteria is required by the funder (ex. Housing for People with AIDS or Mental Health Services Administration) require specific disabilitites).

4. Grant and Fiscal Management:
   CoC funded projects do not need to submit documents in this section. Scores from their renewal application will be applied to the expansion or conversion new project.
   a. Reports and Invoicing
      • Applicants not CoC funded must submit proof of meeting report deadlines and invoicing draws on comparable HUD grants or government grants.
   b. Audits
      • Applicants not CoC funded must submit most recent annual independent audit with Management Letter or financial statement if audit not required — must be from a fiscal year ending December 31, 2015 or later.
   c. Proof of 501c3 non-profit status
      • Applicants not CoC funded must submit proof of 501c3 non-profit status
   d. Evidence of Site Control for Direct-Grantee Site-Based projects (Scattered-site PSH & RRH projects are exempt). Required for any proposed projects for which HUD is paying leasing, operating or rehabilitation cost on a building, both residential and service delivery sites. Without evidence of site control for new projects for whom the above is true, the project cannot be included in the package.
5. Qualifications and Experience (Non-CoC funded applicants and DV Bonus projects)
   a. Must provide 1 Letter of Recommendation demonstrating applicant’s capacity and experience managing projects and performing activities proposed in the application, and a list of applicant’s current government and private grants

For DV Bonus Projects
   a. For RRH and Joint TH and PH-RRH, must provide 1 Letter of recommendation demonstrating experience in serving survivors of domestic violence, dating violence, sexual assault, stalking, and trafficking, and ability to house survivors and meet safety outcomes.
   b. For SSO Projects for Coordinated Entry, must provide 1 Letter of Recommendation documenting applicant’s experience providing services to DV survivors and expertise in policy and/or training in the fields of domestic violence, sexual assault and/or trafficking (for SSO Projects for Coordinated Entry)

6. NEW Community and Client Engagement: Serving the Educational Needs of children and youth (new projects serving households with children and youth only):
   a. Existing or proposed Applicant’s written policies, formal agreements, MOUs or partnerships with local school(s), youth education providers, early childhood providers, Head Start or other educational services to meet the educational needs of children and youth.

The scoring tool at the back of the application details how projects earn points in each category. The application form and the scoring tool are tightly linked. As you prepare the application, the scoring chart at the end of this local application can be detached and used alongside many of the sections to self-score.

Projects must score a minimum of 60 points to be assured inclusion in the application package. Applicants are strongly encouraged to review the local application, and to self-score their project on the performance indicators as soon as possible to determine if they will meet the minimum score. If in self-scoring the project does not appear to meet threshold, please contact info@everyonehome.org.

In addition to the total score projects receive, reviewers may use additional factors to break ties, adjust the final ranking to place the maximum dollars in Tier 1, include projects that score below 60 points, and/or meet other local objectives for a strong and balanced package that maximizes points for the entire Continuum. Factors that may be considered include:
   • the geographic and population diversity of the projects included;
   • the projected impact of the loss of any residential buildings on homeless people;
   • the expiration date and amount of the grant.

Download a PDF version of the 2018 NOFA New Projects Local Application from the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/. Save your completed application and its attachments as a PDF with agency, project, and content in the file name and attach to an email to info@everyonehome.org to submit as described on Page 1. Multiple PDFs for agencies with large files for backup are acceptable. Public entities are welcome to submit their formal audit responses via link in the cover email with relevant page numbers of findings and letters indicated in their communication.

For questions regarding the completion of the local application, please contact EveryOne Home at info@everyonehome.org. The Frequently Asked Questions (FAQ) period starts on July 20, 2018 and ends on
August 2, 2018. Questions received will be responded to in writing individually and posted to the EveryOne Home website at http://everyonehome.org/our-work/hud-coc-nofa/ in two batches on July 31, 2018 and August 3, 2018.

All project applications received by the deadline will be reviewed and applicants will be notified by September 3, 2018 of their score, their initial ranking, and whether they are being included in the Consolidated Application. Ranking is subject to change according to appeals (if any) and the final ranking will be released September 14, 2018.
Checklist of Required Documentation:

1. Homeless Management Information System (HMIS) or comparable Reports
   - If expanding an existing CoC funded project to a different population the existing project APR and another APR (or appropriate reports from a comparable data base) from a project serving the proposed population must be included.
   - If converting to a different project type, include APR for existing program and an APR (or appropriate reports from a comparable data base) from the program type being proposed.
   - If applicant not an HMIS user, attach appropriate reports from a comparable data base.

2. Housing First Documentation
   - If proposing to serve a different population that modifies the Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules, the new or proposed HF documentation must be submitted.
   - If converting to a different project type, include existing or proposed HF documentation, including Resident Selection/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules.
   - If not CoC funded, include documentation that shows implementation of Housing First principles in a comparable program, including Resident Selection Criteria/Housing Application; Participant Agreement; Lease and/or subleases; and/or House Rules.

3. Client Eligibility
   - If proposing to serve a different population that modifies the client eligibility and/or verification of eligibility, documentation must be submitted.
   - If converting to a different project type, existing or proposed program Eligibility Criteria for Project Entry and written procedures for verifying eligibility must be submitted.
   - If not CoC funded, existing or proposed program Eligibility Criteria for Project Entry (i.e., Must be HIV+; families with minor children; individuals and families fleeing domestic violence), and written procedures for verifying eligibility must be submitted.

4. Grant and Fiscal Management
   - Proof of timely reports and invoices/draws for comparable HUD or other government grants.
   - Most recent annual independent audit with Management Letter or financial statement if audit not required —must be from a fiscal year ending December 31, 2016 or later.
   - Proof of 501c3 non-profit status
   - Evidence of Site Control (if applicable)
5. Qualifications and Experience

Non CoC funded Applicants and DV Bonus projects only

☐ Non CoC Funded: Must provide 1 Letter of Recommendation demonstrating applicant’s capacity and experience managing projects and performing activities proposed in the application

☐ Non CoC Funded: Must provide a list of applicant’s current government and private grants

☐ DV Bonus Projects proposing RRH and Joint TH and PH-RRH, must provide 1 Letter of recommendation demonstrating experience in serving survivors of domestic violence, dating violence, sexual assault, stalking, and trafficking, and ability to house survivors and meet safety outcomes

☐ DV Bonus Projects proposing SSO Projects for Coordinated Entry, must provide 1 Letter of Recommendation documenting applicant’s experience providing services to DV survivors and expertise in policy and/or training in the fields of domestic violence, sexual assault and/or trafficking (for SSO Projects for Coordinated Entry)

6. NEW Community and Client Engagement — Serving the Educational Needs of children and youth

☐ Existing or proposed written policies, formal agreements, MOUs or partnerships with local school(s), youth education providers, early childhood providers, Head Start or other educational services (if applicable).
Project Cover Sheet (Up to 5 points):

a. Primary Activity Type (up to 5 points)
New in 2018, New and Renewal Projects are required to review a Project Cover Sheet as part of submission. Given that previous NOFA Local Application's General Section contained some fixed information, Projects will now be able to respond to a simpler evaluation in the future by confirming and/or updating pre-populated responses. Consistent with past NOFAs, the Primary Activity Type of each project will be worth up to 5 points.

To complete this section, Applicants are asked to:

i. Complete the Project Cover Sheet template on Page 4:
   a. Primary Activity Type – indicate one of the following options: PSH, RRH, Joint TH/PH-RRH, SSO-CE for DV Bonus, SSO-CE.
   b. Target Population – indicate which the following target populations will be serviced by the proposed project:
      o PSH DedicatedPLUS
      o PSH with 100% CH
      o RRH (for families/individuals, including unaccompanied youth)
      o Joint RH/PH-RRH (for families/individuals and families/individuals including individuals and families fleeing or attempting to flee DV, dating violence, sexual assault, stalking, or trafficking.
   c. Total number of Beds and Total Number of Units - indicate Total number of beds in proposed project, including beds which will be covered by funds other than the HUD CoC.
   d. Number of CoC-funded beds/units - refer to the number of beds which will only be covered by CoC-funding.
   e. Project Description – Use the Narrative box to respond to the following:
      1. Identify sub-grantees, their role in the project, and the history of collaboration between proposed partners.
      2. Describe the type of housing being proposed, including the number and configuration of units, and how this will fit the needs of program participants (e.g. two or more bedrooms for families).
      3. What is the overall goal and vision for the project?
      4. Indicate the number of people to be served during the project year and the outcomes anticipated.

ii. In your submission email, include a photo of the physical exterior of the Project’s location.

   Domestic Violence or human trafficking providers may use Project/Agency logo. Services-only providers may use a photo of their main office space/headquarters within Alameda County.
2018 EveryOne Home Local Application
New Project Coversheet

Project Name:

Expected Alternative Project Names
(ex: HMIS, HIC, etc.):

Applicant Name:

Is Project CoC-funded?
□ Yes □ No

Is Project applying as an Expansion?
□ Yes □ No

i. Is Expanding Project changing Population Type?
□ Changing Population Type □ As Is

Project classified as Rental Assistance?
□ Yes □ No

Is Project applying as a Conversion?
□ Yes □ No

i. Project applying as a Conversion to a New Project?
□ Yes □ No

Site Owned/Long-term lease:

Project Description:

ii. Is Conversion Project anticipating taking advantage of the Transition Grant?
□ Yes □ No

Proposed Project Start Date:

Expanding Project Grant Number:

Application Amount:

Match Amount:

Match Amount Funding Source(s):

Primary Activity Type & Target Population:

Person In Agency Authorized to submit or withdraw application for consideration and certify that Project participates in Coordinated Entry:

Proposed number of CoC-funded beds and units:
2. HUD PRIORITIES (Up to 25 points):
   a. Target Populations and Severity of Need (up to 4 points)
      i. Ending Chronic Homelessness:
         ☐ Proposed PSH project for 100% chronically homeless households.

      ii. Is the Project applying for the Domestic Violence (DV) Bonus?
          ☐ Yes          ☐ No

         Under which Project Type?
         ☐ Proposed RRH  ☐ Proposed Joint TH-RRH  ☐ Proposed SSO-CE

   b. Will Improve System Performance (up to 9 points)
      i. Describe the need for this Project in the CoC
         All Project types, please describe how project will address a gap in the CoC's capacity to meet the needs of the population to be served.

      ii. Improving the Performance of the CoC
         All Project types, please describe how the project will improve the performance of the CoC in the following areas, 1) Reducing the time individuals and families are homeless; 2) Reducing returns to homelessness; 3) Increasing income; and 4) Obtaining or retain permanent housing.
iii. Supportive Services to Retain/Obtain Permanent Housing

SSO-CE Projects do not respond to this question

All Project types describe the type of supportive services that will be offered to program participants, and how these services will help to ensure a successful retention in the program or help to obtain permanent housing. Be sure to include all supportive services, regardless of the funding source.

iv. Special Assistance to Retain/Obtain Permanent Housing

SSO-CE Projects do not respond to this question

All Project types describe how program participants will be assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g. provides participant with some type of transportation to access services, safety planning, tenancy sustaining services, landlord liaison services, and other assistance to ensure retention.

v. Obtain Mainstream Benefits

SSO-CE Projects do not respond to this question

All Project types describe whether the proposed project has a specific plan for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social, and employment program for which they are eligible to apply (e.g. Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood development).
vi. Capacity and resources for rapid rehousing portion for Joint TH/PH-RRH Projects

For Joint TH/PH-RRH Projects only

Describe how the proposed project will provide enough rapid rehousing assistance to ensure that program participants may, at any given time, move from transitional housing to permanent housing. This may be demonstrated by identifying a budget that has twice as many resources for the rapid rehousing portion of the project than the TH portion, by having twice as many PH/RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.

vii. Approach to improving Coordinated Entry

For SSO only-CE and DV-Bonus SSO only-CE

Describe how the proposed project improve coordinated entry. For DV-Bonus address how project will to implement policies, procedures, and practices for Coordinated Entry to better meet the need of survivors of DV, dating violence, sexual assault, human trafficking, or stalking.

c. Utilizing a Housing First Approach Narrative (up to 4 Points)

For this section scoring will be based on project response to the Narrative Prompts below. HUD defines Housing First as, “a model of housing assistance, that prioritizes rapid placement and stabilization in permanent housing that does not have services participation requirements or preconditions (such as sobriety or a minimum income threshold). Transitional housing and supportive service only projects are considered using a Housing First model if they operate with low barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and, for transitional housing projects, do not require any preconditions for moving into the transitional housing (e.g. sobriety or minimum income threshold) (2018 NOFA, Page 18).”

1) Describe how the proposed project is low-barrier and whether preconditions to entry are required — such as requiring sobriety or minimum-income.

2) How will the services be voluntary, and how will the Project prioritize engagement and problem-solving over therapeutic goals?

3) How will the Project prioritize rapid placement and stabilization in permanent housing? Describe how eviction back into homelessness will be avoided.
d. Utilizing a Housing First Approach Documentation (up to 6 Points)
For this section, scoring will be based on review of documents that demonstrate the specific project adheres to some of the Housing First principles (low barrier/no preconditions to entry; voluntary services and program retention; rapid placement and stabilization in permanent housing). Please submit any supporting documentation (Please check Page 1-2 for Checklist) as an Attachment to your Local Application Package. Use the appropriate boxes below to indicate Document Name, File/Attachment Name, and Page numbers which refer to any policies and procedures related to Housing First principles.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
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</tbody>
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e. Cost Effectiveness (up to 2 points)
Cost per year of housing retention or cost per permanent housing exit for proposed new projects will be based on proposed project budget. Use the formula below to calculate cost per year of housing retention or cost per permanent housing exit.

Projects will be scored by comparing their cost per outcome to the average cost of their: 1) primary activity type; and 2) site-based vs. scattered site for PSH housing and services and PSH housing only (ex. Scattered site PSH-housing only will be compared to the average for Scattered site PSH-housing).

Cost per Outcome:

i. Proposed number of persons who will obtain permanent housing during grant year or

ii. Proposed number of persons who will retain permanent housing during grant year

Total project budget (HUD dollars + match) = \$_____/ Total # from i. or ii. above = cost per outcome

2018 New Project's Local Application Package Page 8
3. PERFORMANCE OUTCOMES (up to 32 points):

New 2018, EveryOne Home staff will perform manual calculations of Performance Outcomes A-D for all New Projects. Applicants needs only include their APR or equivalent report. For an explanation of how calculations are performed please refer to Appendix C available for download on the EveryOne Home website at: http://everyonehome.org/our-work/hud-coc-nofa/

This section is related to Projects’ Performance on local and HUD required outcomes. This section will be scored as follows:

- For existing CoC Projects proposing to expand current housing and services to the population already being served, performance outcome scores from the corresponding renewal project will be used for all four outcomes (A-D).
- For projects proposing to expand the same program component type but to a different population (DV survivors, or families instead of singles) or convert to a new project type, the score will be an average of the current APR and the APR for a comparable program serving the proposed population.
- For projects proposing to convert to a new project type, the score will be an average of the current APR and the APR for a comparable project to the one being proposed.
- For non-HMIS program reports, comparable performance measures will be scored from the reports.

New 2018, EveryOne Home staff will perform manual calculations of Performance Outcomes A-D for all New Projects. Applicants needs only include their APR(s) or equivalent report. For an explanation of how calculations are performed please refer to Appendix C available for download on the EveryOne Home website at: http://everyonehome.org/our-work/hud-coc-nofa/

4. GRANT MANAGEMENT (up to 20 points)
   a. Spending (up to 5 points):
   Scoring for this session will be based on the Project’s ability to fully expend government grants. To earn maximum points, the expectation is that applicants demonstrate they have spent 95% or more of their CoC or comparable government grant in its last grant year.

   i. Complete the chart below using spending of history of comparable grants.

<table>
<thead>
<tr>
<th>Unspent funds</th>
<th>Dates of grant year and source. CoC grantees must report on that source. Non-CoC grantees report on a comparable source.</th>
<th>Amount of Total Grant awarded</th>
<th>Amount unspent and returned</th>
<th>% of grant award unspent (Amount unspent / Amount of Total Grant)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Most recently completed grant year</td>
<td></td>
<td></td>
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<tr>
<td>Previous Year</td>
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<tr>
<td>2 years previous</td>
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</tbody>
</table>
ii. Briefly explain any unspent grant funds in the most recent program year and provide detailed strategies/measure taken to reduce under-spending in the future.

b. Reports and Invoicing – (up to 6 points)
i. Timely Submission of APRs/progress reports:
Submit proof of timely submissions of APRs/progress reports for a comparable program and/or other government grants. Submissions can be demonstrated via e-snaps as indicated in the screen shot below. Submissions must include all columns presented below.

End date of Grant

Source of Grant

Due date(s) of APR/progress reports

Submission dates of APR/progress reports:
Most Recent Year
Prior Year
Two years Prior
<table>
<thead>
<tr>
<th>Funding Opportunity Name</th>
<th>Start Date</th>
<th>End Date</th>
<th>Associate Type</th>
<th>Version</th>
<th>Date Submitted</th>
</tr>
</thead>
</table>

ii. Timely Draw Downs from LOCCS - Primary CoC funded Grantees only, for their projects and any sub-recipient projects. Submit proof of timely drawdowns for a comparable program or other federal grants and progress reports. Draw downs can be demonstrated via LOCCS, as indicated in the screenshot below. Submissions must include all columns as presented below.

Grant year from ___________ to ___________

Dates of draw requests from last two grant cycles

2018 New Project’s Local Application Package Page 11
c. Capacity and Utilization (up to 4 Points):
Proposed projects should submit the information below, verifiable by APR or other reports, for a comparable program.

**Site-based Projects (PSH and Joint TH/PH-RRH):**
Number of proposed units in project (F) =
Average # of proposed Households to be served = to find this value add the four PIT Counts of households and divide by 4 (Q8b) fields (B+C+D+E)/4 =

For projects using comparable reports: B, C, D, and E measures the point-in-time count of participating households on the last Wednesday of January, April, July, and October, respectively.

<table>
<thead>
<tr>
<th>8b - Point-in-Time Count of Households on the Last Wednesday</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Total&quot;</td>
</tr>
<tr>
<td>&quot;January&quot;</td>
</tr>
<tr>
<td>&quot;April&quot;</td>
</tr>
<tr>
<td>&quot;July&quot;</td>
</tr>
<tr>
<td>&quot;October&quot;</td>
</tr>
</tbody>
</table>

**Utilization Rate:** (Average # of Households Served / Number of Units) in Project
Scattered Site (PSH and RRH)
Number of contracted subsidies/slots in project (F) = [ ]
Households served = APR question 8.a (field A below)

| 8a - Number of Households Served | "Total" | "Without Children" | "With Children and Adults" | "With Only Children" | "Unknown Household Type"
<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>&quot;Total Households&quot;</td>
<td>A</td>
<td></td>
<td></td>
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</tbody>
</table>

Utilization Rate = # of Households served (A) / Number of contracted subsidies (F) = [ ]

d. Client Eligibility (up to 5 points):
Scoring for this Section will be based on review of documents that demonstrate the proposed project has adequate procedures for determining, verifying, and documenting client eligibility. Please submit any supporting documentation (for specifics, please refer to Checklist under Client Eligibility, Pages 1-2) as an attachment to your Application Package. Use appropriate boxes below to indicated Document Name, File/Attachment name, and Page Number(s) which refer to any policies and procedures related to Client Eligibility. PSH Projects: Per CoC requirements, all vacancies in project are to be filled using Coordinated Entry referrals, as indicated in the HomeStretch MOU.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
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<tbody>
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</tbody>
</table>
5. ORGANIZATIONAL CAPACITY (up to 18 Points)
   a. Fiscal Management – Grantees only (up to 4 points)

      Only for Not CoC funded Applicants

      i. Does this project or the applicant agency have any of the following issues: 1) Any audit or monitoring findings from any HUD source (these could include, but are not limited to: ESG, HOPWA, HOME, CDBG as well as CoC funding); 2) A current outstanding obligation to HUD which is in arrears or for which a payment schedule has not been agreed upon; 3) Audit findings from your Annual Independent Audit which remain unresolved?
         □ No □ Yes

      ii. Has HUD instituted any sanctions on any project of your agency, including, but not limited to, suspending disbursements (e.g., freezing LOCCS), requiring repayment of grant funds, or de-obligating grant funds due to performance issues?
         □ No □ Yes       If yes, please include written communications from HUD concerning those matters as an attachment to your Project Evaluation package.

Attach a copy of the direct grantee’s most recent Annual Independent Audit / Financial Statement from no earlier than 12/31/2016 (refer to Checklist for Grant and Fiscal Management). Indicate Document name, File name, and page number(s) of Audit findings in applicable boxes below. Audits from sub-grantees are not required. Applicants who can provide a link to an on-line version of your audit may do so for ease of submission by including the link in your cover email. All other applicants please submit your documents in PDF form attached to your submission email. Explain if the audit is not for the most recently finished fiscal year. All applicants must include a copy of their Annual Independent Audit regardless of answers to any question in this section.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
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<tbody>
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</tbody>
</table>

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b. Capacity to Serve Population Targeted by Project Narrative (up to 7 points)
Scoring for this section will be based on Project’s response to the Narrative prompts below. Please use the space provided to:
1) Describe the length of time project partners have served the project’s target population.
2) Describe the types of services and housing delivered to this population in existing project and/or comparable projects.
3) Other information that qualifies project partners to deliver effective services to target population.
4) In the case of applicants proposing to improve Coordinated Entry (SSO-CE) to by implementing policies, procedures, and practices to better meet the need of survivors of DV, dating violence, sexual assault, or stalking (i.e., implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between CE and victim services providers). Describe experience in system design and provider training.

---

6. New Question (NOT SCORED IN 2018)
a. Community and Client Engagement
New in 2018, this question will not be scored. If including attachments, use appropriate boxes below to indicate Document Name, File/Attachment Names, and Page numbers. HUD considers ensuring the educational needs of children and assisting participants in increasing income, self-sufficiency, and independence a priority. Using the
Narrative box below, please describe your proposed project’s relationships with local community agencies related to education, such as MOU or other informal agreement with local schools to support school-aged children of program participants. Projects with non-cash community leverage resources in educational or job-training services should include these resources in the narrative below.

<table>
<thead>
<tr>
<th>Document Name</th>
<th>File/Attachment Name</th>
<th>Page Number(s)</th>
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<tbody>
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<tr>
<td>Criterion</td>
<td>Points</td>
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<tr>
<td>--------------------------------------------------------------------------</td>
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<td></td>
</tr>
<tr>
<td>1. Project Cover Sheet = 5 Points maximum</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.a Primary Activity type = 5 Points maximum</td>
<td></td>
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<tr>
<td>Proposed new DV bonus, PSH and Joint TH/PH-RRH = 5 Points</td>
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<tr>
<td>Proposed new Rapid Rehousing, SSO-CE = 3 Points</td>
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</tr>
<tr>
<td>2. Project addresses Local and HUD Priorities = 25 Points maximum</td>
<td></td>
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<tr>
<td>2.a Target populations and severity of need = (up to 4 points)</td>
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<tr>
<td>Proposes to provide new PSH to 100% of chronically homeless households</td>
<td></td>
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<tr>
<td>Proposes RRH or Joint TH/PH-RRH or SSO-CE for survivors of domestic</td>
<td></td>
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<tr>
<td>violence, sexual assault, stalking, or human trafficking = 3 Points</td>
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<tr>
<td>2.b Will improve system performance = (up to 9 points)</td>
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</tr>
<tr>
<td>Narrative Questions 2.b.i-vii = up to 9 Points as determined by</td>
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<tr>
<td>application scorers. Describes a program design that will</td>
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<td>credibly support improved system performances by reducing lengths of</td>
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<tr>
<td>time homeless, helping people of obtain and retain housing and income.</td>
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<tr>
<td>2.c Housing First narrative = 4 Points as determined by</td>
<td></td>
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<tr>
<td>application scorers.</td>
<td></td>
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<tr>
<td>2.d Housing First and Low Barrier documentation = 6 Points maximum</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Documents demonstrate adherence to specific Housing First principles.</td>
<td></td>
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<tr>
<td>All applicable boxes can be checked, and points will be</td>
<td></td>
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<tr>
<td>cumulative up to 6 points for this section.</td>
<td></td>
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<tr>
<td>2.e Cost Effectiveness = 2 points</td>
<td></td>
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<tr>
<td>Budgeted costs for new proposals will be scored</td>
<td></td>
<td></td>
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<tr>
<td>3. Outcome Performance = 32 Points maximum</td>
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<td></td>
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<tr>
<td>3.a APR Performance Outcomes A-D = 32 Points maximum</td>
<td></td>
<td></td>
</tr>
<tr>
<td>See Sector Specific Benchmarks and Self Scoring Charts on the following</td>
<td></td>
<td></td>
</tr>
<tr>
<td>pages.</td>
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<td></td>
</tr>
</tbody>
</table>

2018 New Project’s Local Application Package Page 17
<table>
<thead>
<tr>
<th>Section</th>
<th>Criteria</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4</strong></td>
<td>Grant Management = up to 20 Points maximum</td>
<td>4.a Spending = 5 Points maximum  &lt;br&gt; Proposed project applicant has a record of fully expending comparable grants = 5 Points  &lt;br&gt; Proposed project applicant has a record of expending less than 95% of funds in comparable projects = up to 3 Points  &lt;br&gt; 4.b Reports and Invoicing = 6 points maximum  &lt;br&gt; Proposed projects can provide evidence through three (3) maximum APRs or equivalent reports and quarterly LOCCS draws for the last two grants cycled for a comparable program = 6 Points  &lt;br&gt; 4.c Capacity and Utilization = 4 points maximum  &lt;br&gt; Proposed projects who were fully utilized during the program year in a comparable program = 4 Points  &lt;br&gt; 4.d Client Eligibility = 5 points maximum  &lt;br&gt; All applicable boxes can be checked, and points will be cumulative up to 5 points for this section  &lt;br&gt; Proposed project’s can provide evidence of written policy that clearly describes client eligibility requirements and funding sources (i.e. eligibility requirements for mental health funding contracts), and requirements are consistent with specific project eligibility information provided to Coordinated Entry/HomeStretch for a comparable program = 2 Points  &lt;br&gt; Proposed project can provide evidence of clear, written procedures for verification of client eligibility and homeless history, in addition to proof of referrals from Coordinated Entry/HomeStretch (i.e., CE HUB provided verification documentation, staff verification of 3rd party documentation, etc.) for a comparable program = 3 Points</td>
</tr>
</tbody>
</table>
| **5** | Organizational Capacity = 18 points maximum for entire section | 5.a Fiscal Management = 4 points maximum  <br> Proposed projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2016, that shows no findings or areas of concern in the management letter = 4 Points  <br> Proposed projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2015, that does show findings or areas of concern in the management letter which have been formally addressed by the Agency and/or funder’s = 2 Points  <br> Proposed projects provided the most recent annual independent audit (or financial statement if audit is not required) from no earlier than FYE ending December 31, 2015, that does show findings or areas of concern in the management letter which have not been addressed = 0 Points  <br> 5.b Capacity to Serve Population targeted by project = up to 7 Pts  <br> Proposed project will be scored a maximum of 7 points for their experience serving the population targeted by the project as indicated by narrative response to question 5.b and attached letters of recommendation if applicable  <br> 5.c Quality Assurance = 7 Points as determined by application scorers  <br> Proposed project will be scored a maximum of 7 points for their quality assurance narrative as determined by application scorers.
### 2018 Scoring for Outcome Measures, by Sector

#### 1. Permanent Supportive Housing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
</table>
| A Retains and/or exits to other Permanent Housing > 12 months | 95% | □ Proposes to meet or exceed local benchmark in a new project and has demonstrated capacity from similar projects = 10 Points
□ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points |
| B Adults who maintain or increase income | 50% of leavers and stayers | □ Proposes to meet or exceed local benchmark in a new project and has demonstrated capacity from similar projects = 7 Points
□ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points |
| C Obtains/maintains non-cash mainstream benefits | 56% leavers and stayers | □ Proposes to meet or exceed local benchmark in a new project and has demonstrated capacity from similar projects = 7 Points
□ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points |
| D Exits to Homelessness | Approx. 10% of total bed capacity | □ Proposes to meet or exceed local benchmark in a new project and has demonstrated capacity from similar projects = 8 Points
□ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points |

**Reference Table for PSH Outcome Measure D**

<table>
<thead>
<tr>
<th>Total Bed Capacity in Program</th>
<th>Benchmark Number of Exits to Homelessness (Approx. 10% of bed capacity)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-14</td>
<td>1</td>
</tr>
<tr>
<td>15-24</td>
<td>2</td>
</tr>
<tr>
<td>25-34</td>
<td>3</td>
</tr>
<tr>
<td>35-44</td>
<td>4</td>
</tr>
<tr>
<td>45-54</td>
<td>5</td>
</tr>
<tr>
<td>55-64</td>
<td>6</td>
</tr>
<tr>
<td>65-74</td>
<td>7</td>
</tr>
<tr>
<td>75-84</td>
<td>8</td>
</tr>
<tr>
<td>85-94</td>
<td>9</td>
</tr>
<tr>
<td>95-104</td>
<td>10</td>
</tr>
<tr>
<td>105-124</td>
<td>12</td>
</tr>
<tr>
<td>125+</td>
<td>18</td>
</tr>
</tbody>
</table>

2018 New Project’s Local Application Package Page 19
2. Rapid Rehousing

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtains Permanent Housing</td>
<td>80%</td>
<td>☐ Proposes to meet or exceed local benchmark in a new RRH project and has demonstrated capacity from similar projects = 9 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
<tr>
<td>B Adults who Increase Income</td>
<td>30% of leavers and stayers</td>
<td>☐ Proposes to meet or exceed local benchmark in a new RRH project and has demonstrated capacity from similar projects = 7 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
<tr>
<td>C Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td>☐ Proposes to meet or exceed local benchmark in a new RRH project and has demonstrated capacity from similar projects = 7 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
</tbody>
</table>

3. Joint TH/PH-RRH

<table>
<thead>
<tr>
<th>Measure</th>
<th>Benchmark</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Obtains Permanent Housing</td>
<td>80%</td>
<td>☐ Proposes to meet or exceed local benchmark in a new RRH project and has demonstrated capacity from similar projects = 9 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
<tr>
<td>B Adults who Increase Income</td>
<td>30% of leavers and stayers</td>
<td>☐ Proposes to meet or exceed local benchmark in a new RRH project and has demonstrated capacity from similar projects = 7 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
<tr>
<td>C Obtains or Maintains non-cash Mainstream Benefits</td>
<td>56% of leavers and stayers</td>
<td>☐ Proposes to meet or exceed local benchmark in a new RRH project and has demonstrated capacity from similar projects = 7 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
<tr>
<td>D Median Length of Stay</td>
<td>&lt;180 days</td>
<td>☐ Proposes to meet or exceed local benchmark in a new Joint TH and PH-RRH project and has demonstrated capacity from similar projects = 8 Points&lt;br&gt;☐ Project proposed outcomes that do not meet local benchmark and/or evidence from prior projects indicated that applicant cannot meet local benchmark = 0 Points</td>
</tr>
</tbody>
</table>