COMPARABLE DATABASE 101: WHAT VICTIM SERVICE PROVIDERS NEED TO KNOW

Produced by the National Network to End Domestic Violence (NNEDV) and Collaborative Solutions (CS).

- Key differences between HMIS and a Comparable Database (CD)
- Overview: HUD, FVPSA and VAWA data requirements
- 2017 SAGE reporting requirements
- Helpful tools for choosing a Comparable Database

BACKGROUND

A Homeless Management Information System (HMIS) is a locally administered data system used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness. The U.S. Department of Housing and Urban Development (HUD) and other policymakers use HMIS data to better inform homeless policy- and decision-making at the federal, state, and local levels. Victim service providers, as referenced in the HMIS Proposed Rule, cannot input client-level information into the certified local HMIS system under the standard privacy and security settings. Victim service providers, instead, must enter client information into a separate Comparable Database, and provide aggregate data to the Continuum of Care (CoC). A Comparable Database must comply with HMIS requirements. Within the HMIS Proposed Rule, a Comparable Database is an alternative system that victim service providers use to collect client-level data over time and to generate aggregate reports based on the data. CoC and Emergency Solutions Grants (ESG) funds may be used to establish and operate a Comparable Database that collects client-level data over time and generates aggregate reports based on the data. The CoC and victim service providers must work with the HMIS lead to determine if a system is a Comparable Database and document that the alternative system meets all HUD system requirements. Additional HUD guidance on Comparable Databases is forthcoming.

DATA AND CONFIDENTIALITY OVERVIEW: the Violence Against Women Act (VAWA), Family Violence Prevention Services Act (FVPSA) and HUD Funded Victim Service Providers

The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit victim service providers from sharing, disclosing or revealing victims' personally identifying information, including entering information into shared databases like HMIS. These provisions underpin confidentiality practices that protect the safety and privacy of victims of domestic violence, dating violence, sexual assault, and stalking who are seeking services. The confidentiality provisions in VAWA and FVPSA apply to all grantees and subgrantees funded by VAWA and FVPSA.

Based on VAWA requirements, **HUD ESG and CoC subrecipients who are victim service providers are prohibited from entering personally identifying information in HMIS**. Additionally, all households, whether being served by a victim service provider or not, have the right to refuse to have their personally identifying information entered into HMIS and shared among providers within the CoC and are still able to receive services if eligible.

VAWA and FVPSA:
- Prohibit grantees from disclosing, revealing, or releasing any personally-identifying information or individual information collected in connection with services requested, utilized, or denied through grantees' and sub grantees' programs, regardless of whether the information has been encoded, encrypted, hashed, or otherwise protected without informed, written, reasonably time-limited consent.
- State that in no circumstances can any personally-identifying information be shared in order to comply with Federal, tribal, or State reporting, evaluation, or data collection requirements, whether for this program or any other Federal, tribal, or State grant program.
- Allows grantees to share non-personally identifying data in the aggregate regarding services to their clients and non-personally-identifying demographic information to comply with Federal, State, tribal, or territorial reporting, evaluation, or data collection requirements.

Additionally, VAWA prohibits grantees from requiring a signed release as a condition of service. Victim service providers cannot be penalized by having their funds withheld or application incentives removed for complying with this federal law or any State law protecting victim confidentiality.

It's critical to inform survivors that they have the right to refuse to answer any of the questions required to complete the data fields and survivors must be given the option to not provide personally-identifying information that will be entered into the Comparable Database or HMIS. Programs should ensure that they are aware of the technical aspects of securing of all information collected and retained for this purpose. See link to ***TechSafety Guide to Selecting a Database***

SELECTING A COMPARABLE DATABASE

It is essential to center confidentiality, security designs, privacy requirements, and guidelines as set forth by VAWA and FVPSA federal law when choosing a database. Confidentiality, security designs, privacy requirements, and guidelines set forth by VAWA and FVPSA federal funding source should all be an important part of choosing a database. Selecting and purchasing a Comparable Database is a part of a planning process to determine what is best for your organization and local CoC requirements. Secure and victim-centered Comparable Databases must have the following characteristics:
- ➢ The victim service provider controls who can access and see client information.
- ➢ Access to the database is carefully controlled by the victim service provider.
- ➢ Meets the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The Comparable Database may use more stringent standards than the Continuum of Care's HMIS.
- ➢ Complies with all HUD-required technical specifications and data fields listed in HMIS.
- ➢ Be programmed to collect data with the most up-to-date HMIS Data Standards.

> ➢ Have the functionality necessary to de-duplicate client records within each system in order to provide an aggregate and unduplicated count of clients by project type.
> ➢ Be able to generate all reports required by federal partners, for example, the HUD-CoC APR and the HUD-ESG CSV for the e-CART reporting tool.
> ➢ Data fields that can be modified and customized by the victim service provider to benefit clients.

Additionally, individual survivor data must be routinely destroyed as soon as the program no longer needs it to provide client services or to satisfy grant/legal requirements. Victim service providers may suppress aggregate data on specific client characteristics if the characteristics would be personally identifying. Finally, the program's contract with the database vendor should include binding agreements to ensure security of and program control over client data.

SAGE: HMIS REPORTING REPOSITORY

HUD is changing the data submission format for the annual HUD CoC Annual Progress Report (APR) and victim services providers with Comparable Databases need to be able to meet SAGE requirements.

> ➢ **What is SAGE?** HUD is switching from e-snaps to the new platform, SAGE, for APR reporting. Recipients are required to upload time-stamped Comma Separated Values (CSV) data from their HMIS/Comparable Database to fulfill the APR reporting requirement in SAGE. Recipients will not be able to manually enter data about participants served.
> ➢ **Does SAGE work with my database?** The following Comparable Databases currently utilized by victim service providers will support the CSV requirement for the APR report: Service Point, Osnium WS, and Empower DB. Additional databases may be forthcoming.
> ➢ **When do I need to start using SAGE?** Now! As of April 1, 2017, grantees will no longer submit APRs in e-snaps and will begin using the new system, SAGE. This applies to most CoC homeless assistance grants. Any APR submission that was started in e-snaps prior to April 1, 2017 will be completed in e-snaps.
> ➢ **What if I have difficulty generating a CSV file?** HUD created a platform for providers to submit an "Ask A Question (AAQ)" if they are unable to generate the CSV file. Providers will be given instructions to manually enter the data into a file. As a follow-up with HUD, providers will need to inform HUD how they will update their systems in a timely manner to be able to fulfill the CSV requirement. If you have an APR due soon, reach out to your HUD field office as soon as possible to request an extension to the APR deadline.

Coordinated Entry: Data sharing with the Coordinated Entry context is a related but complex topic. Further guidance on data sharing within Coordinated Entry will be available in the future. For additional information on Coordinated Entry requirements and implementation please see the links below.

ADDITIONAL TOOLS AND FURTHER READING

- ➢ **Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH): Proposed Rule for HMIS Requirements**
- ➢ **2017 HMIS Data Standards**
- ➢ **Domestic Violence Housing and Technical Assistance Consortium Coordinated Entry (CE) Process for Victim Service Providers FAQs**
- ➢ **HUD's Coordinated Entry and Victim Service Providers FAQs**
- ➢ **HUD's Coordinated Entry Guidebook**
- ➢ **CoC Interim Rule**
- ➢ **ESG Interim Rule**
- ➢ **FVPSA & VAWA Confidentiality Overview**
- ➢ **SAGE CoC APR Guidebook**
- ➢ **SAGE: HMIS Reporting Repository**
- ➢ **TechSafety Guide to Selecting a Database**

Please visit NNEDV's technology safety website for more detailed guidance on how to select a Comparable Database. If you would like technical assistance support, please contact Emily Riemer, CS, at emily@collaborative-solutions.net or Debbie Fox, NNEDV at dfox@nnedv.org for further guidance. More information on the Domestic Violence and Housing Technical Assistance Consortium (DVHTAC) is below.

Questions? *The Consortium TA Team is available to provide technical assistance and training. We are available to work more in-depth with you in your local communities as issues arise and as you are developing or revising your community's CES. Please visit SafeHousingPartnerships.org, a resource for local domestic and sexual violence advocates as well as homeless and housing partners, to access resources on-line and to request technical assistance and support.*

The Consortium, launched in 2015, provides training, technical assistance, and resource development at the critical intersection between domestic violence/sexual assault services and homeless services/housing. Funded by a partnership between the U.S. Department of Justice, the Department of Health and Human Services, and the Department of Housing and Urban Development. This multi-year Consortium supports a collaborative TA Team that includes the National Alliance for Safe Housing (a project of the District Alliance for Safe Housing), the National Network to End Domestic Violence, the National Resource Center on Domestic Violence, and Collaborative Solutions, Inc., to build and strengthen technical assistance to both housing/homelessness providers and domestic violence/sexual assault service providers. The Consortium aims to improve policies, identify promising practices and strengthen collaborations necessary to enhance safe and supportive housing options for sexual and domestic violence survivors and their children.