



Homeless Data Integration System (HDIS) Frequently Asked Questions

OVERVIEW

What is HDIS?

The Homeless Data Integration System (HDIS) is a technology solution that allows the State of California to access and compile standardized homelessness data collected by individual Continuums of Care (CoCs) in order to make data-driven policy decisions aimed at preventing and ending homelessness in California.

What will HDIS do?

HDIS will collect certain information from the Homeless Management Information System (HMIS) of each CoC. In Phase 1, HDIS will collect the client information that is already required by the U.S. Department of Housing and Urban Development (HUD), as well as other client information common to all HMIS implementations. As proposed for Phase 2 of the project, other state departments' program data (such as CalFresh and CalWORKS) could be integrated into HDIS, allowing for a far more comprehensive picture of state, local and federal efforts to prevent and end homelessness.

How is this different from what is currently done?

Currently, CoCs use their HMIS to collect data about the homeless population from all homeless service providers in their areas, as required by HUD and other federal partners. The data sent to HUD, on an annual basis, is aggregate information only – no individualized information is shared. Typically, California CoCs do not have access to one another's data and cannot know whether an individual has accessed services in another CoC. HDIS will collect, match, and de-duplicated client-level records from all California CoCs to create a more complete picture of people experiencing homelessness, the homeless service-delivery system and its use by clients.

Who is administering HDIS?

HDIS is administered by the State of California Homeless Coordinating and Financing Council (HCFC), a part of the Business, Consumer Services and

Housing (BCSH) Agency. Please contact Jill Leufgen (jill.leufgen@bcsh.ca.gov) at HCFC for more information about HDIS.

What is the timeline for implementing HDIS?

Procurement: HCFC/BCSH released the solicitation for the procurement of HDIS in early April 2020. The procurement solution includes a proof of concept for up to three vendors, where over a 60-day period the vendors will build a basic, yet operational HDIS, and HCFC/BCSH will evaluate which option provides the best value for California based on pre-established criteria. HCFC/BCSH anticipates that the contract with the selected vendor will be executed in late summer/early fall 2020.

Data Use Agreements: In April 2020, HCFC sent the HDIS data use agreement to all CoCs as part of their Homeless Housing, Assistance and Prevention (HHAP) grant agreement package. In order to receive their HHAP funding, CoCs must sign the HDIS data use agreement and return it to HCFC by July 31, 2020.

Implementation: HCFC/BCSH anticipates that HDIS will be operational in early 2021.

BENEFITS OF HDIS TO COCS AND THE PEOPLE THEY SERVE

How will this benefit CoCs?

HDIS will benefit CoCs in the following ways:

- Provide access to statewide and local homelessness data that can be used to make data-informed decisions at the local level.
- Identify and promote successful best practices to strengthen CoC planning efforts and decision-making to prevent and end homelessness.
- Increase the state support of CoC efforts to reduce and end homelessness.
- Shed light on the characteristics of homelessness at the state-, regional-, and local CoC-levels.
- Support CoC efforts to coordinate and collaborate regionally (e.g., promote a better understanding of how clients may move across CoC boundaries and subsequently improve coordination across CoCs' service-delivery systems).
- Increase awareness of and knowledge about homelessness in rural, suburban and urban communities in California.

- Legitimize the HMIS as the local source of data on the nature and scope of homelessness, and improve the extent of data quality.
- Ensure current funding and programs are designed to best meet the needs of those experiencing homelessness.
- Give access to robust reporting and visualization tools to augment existing reporting and evaluation capabilities.

How will this benefit people experiencing or at-risk of homelessness?

HDIS will benefit people experiencing or at-risk of homelessness in the following ways:

- Improve the services to individuals and families that are at-risk of or currently experiencing homelessness.
- Identify the resources that will most effectively reduce the number of persons becoming homeless in California.
- Reduce the amount of time that individuals and families that are at-risk of or currently experiencing homelessness remain in the homeless system of care.
- Increase the permanent housing opportunities for all individuals and families that are at-risk of or currently experiencing homelessness.

DATA COLLECTION AND SECURITY

What data will the state be collecting?

The state will be collecting individual, client-level data from CoCs in order to develop unduplicated counts of homeless service users, understand their characteristics, and identify their use of homeless assistance and mainstream resources. At a minimum, the state will collect the HUD-required data elements for funding streams and projects contained within local HMIS systems—Project Descriptor Data Elements (PDDE), Universal Data Elements (UDE), and Program Specific Data Elements (PSDE)—plus any other available data elements that are common to HMIS implementations.

How will the state protect the security and privacy of the data that it receives from CoCs?

HCFC takes the privacy rights of individuals very seriously. As such, HCFC will fully comply with all applicable state and federal privacy laws, and will abide by all applicable security laws, standards, and best practices. Personal information will

be protected against unauthorized use and disclosure in strict accordance with applicable law. All publicly available data tools (e.g., aggregate reports, dashboards, ad hoc analyses) will be contain only de-identifiable aggregate data.

Is the state planning to offer an HMIS that can replace CoCs' existing systems, if the CoCs want to opt in?

At this time, the state will not be offering an alternative to the current HMIS at the local level. However, this policy is subject to review.

Will CoCs have to pay for licenses to participate in the HDIS?

No, CoCs will not have to pay for licenses to participate in HDIS.

CLIENT CONSENT

Where can CoCs find information on how to update privacy notices to include HDIS?

Guidance for updating privacy policies is available in HUD's Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice (69 Fed.Reg. 45888-01, 2004), as well as HUD's HMIS Privacy and Security Standards and COVID-19 Response, dated March 27, 2020.

Per recent guidance from HUD on *HMIS Privacy and Security Standards and COVID-19 Response*:

"A [Covered Homeless Organization] 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."

HUD notes in *HMIS Privacy and Security Standards and COVID-19 Response* that the "authority to change the privacy notice at any time exists even if a privacy notice fails to include the required statement about amendment at any time."

In addition, *HMIS Privacy and Security Standards and COVID-19 Response* states that:

"A provider can retract a policy that said that it would give advance notice of a change to its privacy policy and make the change effective immediately. Similarly, a provider that adopted a policy requiring

participant consent for disclosures that the HMIS Privacy and Security Standards allow without participant consent may change or eliminate the requirement for participant consent and make the change effective immediately."

HCFC recommends that CoCs work with their legal counsel to modify their privacy notices. For more HUD HMIS privacy guidance, contact the HUD technical assistance provider, ICF, at chris.pitcher@icf.com or michael.lindsay@icf.com.

USES OF HDIS DATA

How will HDIS data be used?

HCFC will use HDIS to develop a variety of de-identifiable data tools (e.g., aggregate reports, dashboards, ad hoc analyses) to better understand the demographic characteristics and patterns of homelessness; to inform policy, program, and funding decisions; and to educate the California public about the nature and scope of homelessness. All publicly available data tools will be composed only of de-identified aggregate data and will not contain personal information.

What kind of access will CoCs have to HDIS data?

HCFC may make reports of data validation issues and errors available to CoCs. HCFC also plans to develop standard data sets or reports for participating CoCs. CoCs will also have access to analytical data tools provided by the state. CoCs will be able to access their own data from HDIS.

COORDINATION WITH HMIS VENDORS

Will CoCs need to change HMIS vendors to participate in HDIS?

No, the state will work with all HMIS vendors to ensure that data can be collected from any HMIS.

Will CoCs need to update MOUs with their HMIS providers to participate in the HDIS system?

We do not anticipate that CoCs will need to update MOUs with current HMIS service providers; however, we recommend that you confirm this with your provider.

Has HCFC discussed HDIS with all the different HMIS providers in California?

HCFC has previously convened a work group tasked with developing the HDIS, which met with all the HMIS vendors to discuss the creation of the HDIS. HCFC will again be reaching out to HMIS vendors during the HDIS implementation process beginning in the fall of 2020.