
Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness

Rule # PROS-HOUD-Mi-501

This Public Good Measurement and Reporting Standard is issued by the
Public Regional Outcomes Standards Board.

Approved: 14 September 2022

Table of Contents

OBJECTIVE	3
INTENDED REGIONAL EFFECTS OF ISSUING THIS STANDARD	3
OTHER REGIONAL PURPOSES OUTSIDE THE FOCUS OF THIS STANDARD	3
STANDARDS OF PUBLIC GOOD ACCOUNTING AND REPORTING	4
SCOPE AND SCOPE EXCEPTIONS	4
<i>Organizations</i>	4
<i>Types of Data</i>	4
KEY TERMS	5
RECOGNITION – INITIAL AND SUBSEQUENT MEASUREMENT	5
<i>Organizations in Scope with Shareable Data in Scope</i>	5
<i>Organizations in Scope with Utilization Needs of Data in Scope</i>	6
<i>Special Note on Organizations with Shareable Data and Utilization Needs</i>	7
PRESENTATION ON PERFORMANCE OR FINANCIAL REPORTS	7
<i>Disclosure Requirements</i>	7
EFFECTIVE DATE AND TRANSITION	7
APPENDIX A:	8
BACKGROUND INFORMATION	8
<i>Homelessness Data Systems in San Diego</i>	8
<i>Other Central Information Hubs with Relevant Data in the Region</i>	9
BASIS FOR CONCLUSIONS	9
<i>Types of Data Sharing Organizations and Why Sharing Aligns with Public Good</i>	9
ALTERNATIVE VIEWS AND RISK AREAS THAT MAY NEED ADDRESSING IN FUTURE REVISIONS	11
APPENDIX B	11
EXAMPLE SPECIFIC APPLICATIONS OF THIS STANDARD	11
<i>Municipal Agencies with Law Enforcement Officers and without Homeless Outreach Teams</i>	11
<i>Private Funders with Substantive Portfolio of Grants to Homeless Service Providers</i>	11
<i>Service Providers with Substantive Portfolio of Homelessness Services</i>	12
<i>Municipal Agencies with Growing Expenditures in Homelessness Services</i>	12
APPENDIX C	13
NOTES TO HELP READERS OF PERFORMANCE OR FINANCIAL REPORTS FOLLOWING THIS STANDARD	13
<i>Potential Investors in a Service Provider</i>	13
<i>Potential Grant Applicants to a Funder</i>	13
<i>Public Officials or Staff with Homeless Outreach Teams or Law Enforcement</i>	13

Objective

The PROS Board issues these standards on organizational sharing and utilization of data on homelessness in the San Diego region to increase the likelihood an individual experiencing homelessness will end their homelessness permanently and as efficiently as can be reasonably expected in our region. Additionally, these standards are issued to facilitate clarity in the reporting and usability of shared data critical to central information hubs, allowing for more coherent economization of valuable resources for homeless service providers, funders, and municipal leaders.

Intended Regional Effects of Issuing This Standard

Organizations that can share data on the people experiencing homelessness, including service providers and law enforcement agencies, can use compliance with this standard to assure investors that they are collaborating with others as is regionally expected. Furthermore, providers could use this standard to determine if a potential funder will or will not be likely to add further managerial requirements in reporting outside of what is available through central information hubs. Over time, this standard is expected to reduce administrative time on reporting to optimize resources on service provision.

Organizations with a legitimate need for the data, including public and private funders, can use compliance with this standard to lower to the minimum possible the amounts of time and funds expended on development and validation of performance reports on service provision, self-regulate requirements they may place on grantees, and over time, demonstrate a commitment to shared data infrastructure needs for the region.

Finally, this standard acknowledges the impending data sharing requirements of Assembly Bill 133 (signed into law by Governor Gavin Newsom on 27 July 2021) so that participants in Medi-Cal – and individuals experiencing homelessness are qualified – will attain more efficiently their various eligibilities for whole person wellness programs.. Privately funded operators in compliance with this standard will then be able to assist their clients more readily access whole person wellness programs for which they are eligible.

Other Regional Purposes Outside the Focus of This Standard

This standard is entirely focused on participation in appropriate regional data systems; outside the scope of this standard and ultimately to be tackled separately through other PROS Board standards are assurances on data quality once an entity is participating in sharing or retrieval of data through central information hubs.

Similarly, while the PROS Board believes that there may be significant regional value in some future capacity whereby an individual experiencing homelessness or having experienced homelessness could review and update/ validate data – in the way a consumer might be able to check their credit report and request changes – this standard is not trying to facilitate this level of measurement trust with individuals. Again, other regional standards, e.g., in data quality or data assurance, will tackle this concern.

Standards of Public Good Accounting and Reporting

Scope and Scope Exceptions

Organizations

These standards apply to public, quasi-public, and private organizations, including program funders, in San Diego County who are sufficiently engaged in addressing homelessness to have either a finance committee in its governance or an independent financial or performance auditing requirement, whether externally required or self-imposed. Within scope are those sufficiently engaged organizations who either have meaningful data on those experiencing or having previously experienced homelessness or a need to monitor outputs or outcomes from more than one program intended to service populations experiencing homelessness.

Organizations excluded from these standards are private organizations who may have data on those experiencing homelessness but do not perform services directly or those organizations who directly service those experiencing homelessness but are not sufficiently large to have a finance committee or an independent financial or performance auditing requirement. For example, these standards are not expected to be followed by a dry-cleaning business who might interface regularly with individuals experiencing homelessness, even if providing food or money, nor a group of volunteers who might provide water to individuals on the street. These standards would not apply to an individual philanthropist who as a private party finances services to those experiencing homelessness; conversely, a philanthropic organization or fund with public reporting requirements are expected to observe these standards of data utilization. Similarly, a small church who does intend to service those experiencing homelessness and conducts periodic financial or performance audits would fall within the scope of these standards.

Types of Data

The data considered relevant in this standard are discrete measurements that can occur when interacting with an individual experiencing homelessness. Such data include information that can be informative for specific purposes such as describing or analyzing the system of care, facilitating or informing treatments for the providers of care, or assessing effectiveness or efficiency of a provider. Examples include but may not be limited to locations of observed homelessness and locations of any interactions or engagements (verified or unverified), data descriptive of demographics and populations, personally identifiable information, and assessments of interactions and disposition of contacts made. Anything that falls within the Universal Data Elements (UDE) of Homeless Management Information System (HMIS) is certainly within scope, though not all Program Specific Data Elements (PSDE) may fall within scope.

Outside of the scope of this standard are proprietary data on individuals that is not generally useful to other parties in the purposes described previously. For instance, there is no expectation regionally that a church within the organizational scope described in the previous subsection, who might collect data on the faith denominations of those they service through private finance, ought to share that information on

faith denominations. This same church however, even if privately financed, is expected under this standard to share that they serviced individuals experiencing homelessness with verified or unverified demographical data and with personally identifiable information on specified dates and times at specified locations. Other examples could include a provider that may be conducting an internal study on its treatment efficacy, making discrete measurements that are relatively unique to that organization (e.g., wait times in an urgent care center). In such a case, those measurements would be out of scope. The presumption in this standard, however, is that there are few data that are truly proprietary.

Key Terms

Central Information Hub. A central information hub is an aggregated collection of relevant data and/or a single access point to that aggregated data, generally structured based on observable and interpretable units within a topic (homeless individuals, service providers and services offered are all examples of observable units within homelessness central information hubs.) Two readily available and relevant central information hubs for data on homelessness in San Diego are the Homeless Management Information System (HMIS), overseen by the Regional Task Force on Homelessness assigned by the US Department of Housing and Urban Development, and the Community Information Exchange (CIE) system, operated by 211 San Diego. The San Diego District Attorney's Office also maintains a shared shelter availability platform, currently used for victim survivors of crime, that will be made available to all individuals experiencing homelessness by the end of 2022.

Data Collaborative. Because there are data that may be wholly inappropriate for a central information hub, providers and funders of specific services or providers and funders dedicated to specific subpopulations of individuals experiencing homelessness may engage in private data sharing and utilization arrangements that this standard refers to as a data collaborative or collaborative.

Recognition – Initial and Subsequent Measurement

Organizations in Scope with Shareable Data in Scope

Organizations with shareable data in scope shall demonstrate a good faith effort that they are sharing all gathered data pertinent to the recipients of and provisioning of homelessness care with the Regional Task Force on Homelessness Homeless Management Information System (HMIS) and the 211 San Diego Community Information Exchange (CIE), as collected by either system, and when the information is not appropriate to either system, a regional data collaborative with other similar organizations.

Initially, an organization shall recognize its good faith effort when three conditions are met:

1. The organization has participated in the appropriate onboardings or trainings;
2. The organization has approved internal procedures or policies that reasonably assure that the shared data meet the relevant data quality, privacy, and data sharing standards as issued by either

RTFH or 211 or both, if applicable, for information appropriate those systems; and

3. The organization has formally committed to engaging in data collaboratives with similar organizations for those information not appropriate for central information hubs.

In other words, an organization can recognize initially it has demonstrated good faith effort in sharing data after those two conditions are met.

For any period of time after an initial recognition, an organization shall subsequently demonstrate its good faith effort by measuring the following:

1. Recording the frequencies and lengths of time to correct failures to comply with any relevant data entry timing standard; and
2. The financial expenditures incurred to share data pursuant to this standard, both to central information hubs and any collaboratives.

Of note and with respect to the first subsequent measure, if the relevant central information hub rejects transmitted data because the data fail to meet data quality standards, the number of days it takes for such a rejection notice shall not count. If an organization has a real-time connection to the central information hub, then that is sufficient for the organization to recognize subsequently it has demonstrated good faith effort in sharing data.

With respect to the second subsequent measure, the organization shall account for personnel, technological infrastructure, and licensing costs. Personnel costs, including benefits, shall be reasonably determined based on a fair representation of the proportion of those costs functionally intended for data sharing.

Organizations in Scope with Utilization Needs of Data in Scope

Organizations with utilization needs of data in scope shall demonstrate good faith effort that they are utilizing available information in central information hubs like HMIS or CIE without requiring additive or duplicative reports from organizations with shareable data.

Initially, an organization shall recognize its good faith effort when three conditions are met:

1. The organization requires contractually and has provided some level of finance to all of the providers it supports for the providers to meet the initial good faith effort above for data sharing organizations;
2. The organization asserts it will seek available information only through reporting from central information hubs; and

3. The organization asserts it will seek information inappropriate for recording in central information hubs through a collaborative, or when such a collaborative does not yet exist, that it will substantively support and materially contribute to such a collaborative.

For any period of time after an initial recognition, an organization shall subsequently demonstrate its good faith effort by recording the following:

1. The proportion of performance reports it requested that required data outside of the central information hubs and collaboratives;
2. The aggregate finance provided to providers to meet the data sharing standards;
3. The aggregate finance contributed to the central information hubs for maintenance and management;
4. The aggregate finance contributed to collaboratives for information not appropriate to any of the central information hubs; and
5. The aggregate amounts paid to the central information hubs and collaboratives for analysis or reporting services.

Special Note on Organizations with Shareable Data and Utilization Needs

The PROS Board acknowledges that there are organizations whose limited resources are spent primarily on servicing individuals experiencing homelessness and that there would be a reduction in services if resources were allocated to meet the good faith data utilization standards specified here. The PROS Board asserts that such a reduction is acceptable and in fact obligatory for the increase in overall likelihood that those experiencing homelessness will end their homelessness permanently and as efficiently as can be reasonably expected in our region.

Presentation on Performance or Financial Reports

The initial recognition of good faith effort shall be reported in the organization's first publicly available annual performance or financial report, including publicly viewable tax returns like a Form 990, after the initial recognition.

Subsequent measurements of good faith effort shall be reported minimally in all publicly available performance or financial reports in the fiscal year after initial recognition, including publicly viewable tax returns like a Form 990 and annual performance reports. The organization shall account for these measures annually going back to the fiscal year of initial recognition or three years, whichever is shorter.

Disclosure Requirements

When reporting subsequent measurements of good faith effort pursuant to this standard, the organization must disclose the methods by which it determined such measurements, and when independently audited or reviewed, the auditor or reviewer should make an evaluative statement whether those methods meet the intent of this standard.

Of note, this standard does not specify exactly where within reports an organization must provide the information or disclosures required in this standard. See Appendix B for example applications of this standard.

Effective Date and Transition

This standard shall be effective 1 January 2023.

Organizations whose fiscal years end between 1 January 2023 and 31 March 2023 may wait for their subsequent fiscal year to begin to effect this standard. For any reports issued between 1 January 2023 and the beginning of an organization's fiscal year, the organization should minimally disclose its intention to transition to this standard in its following fiscal year.

Appendix A:

Background Information

Homelessness Data Systems in San Diego

In 2001, Congress mandated the U.S. Department of Housing and Urban Development (HUD) to collect unduplicated data on the population of homeless people for each locality¹ (Center for Social Policy, 2002). Ultimately, by 2004, HUD had overseen the creation of the Homeless Management Information System (HMIS) in order to allow local level data to be collected by providers² (HUD, 2021). To ensure participation in this central data system, the most efficient way to reduce duplication and get the most information on the population, ultimately all service providers receiving funding from HUD, the Office of HIV/AIDS Housing, the Health and Human Services (HHS) Department, and the Department of Veterans Affairs (VA) were required to participate in the HMIS system. To further support the development of shared local level aggregate data that is unduplicated, communities and regions were encouraged to join together within natural and logical boundaries to form a Continuum of Care (CoC) which could be cities, one or more Counties, or even at the State Level. As the system developed, it was collective reports from

¹ Howle, "Homelessness in California The State's Uncoordinated Approach to Addressing Homelessness Has Hampered the Effectiveness of Its Efforts."

² US Department of Housing and Urban Development, "FY-2022-HMIS-Data-Standards-Manual.Pdf." HUD Exchange Info (US Department of Housing and Urban Development, December 2021).
<https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Standards-Manual.pdf>

CoCs which were submitted to give a regional, comprehensive picture of the population, needs, and utilization when applying for Federal funding so that funds were triaged and allocated according to need demonstrated in HMIS. California has 44 CoCs, of which San Diego is one and it is organized under the umbrella of the Regional Task Force on Homelessness (RTFH). RTFH is responsible for maintaining the HMIS system in compliance with Federal mandates and in a manner that meets the needs of the local CoC, including the Coordinated Entry (CE) system which is intended to support triaging clients and maximizing utilization of available resources with the least disruption or delay.

The Homeless Management Information System (HMIS) is the database that has been created and mandated by public funders for use by service providers that receive public funds for well over a decade. The San Diego region is organized as a Continuum of Care with the Regional Task Force on Homelessness as the Lead Agency for the local HMIS. Substantial work goes into often annual updates to the data fields and programming logistics to continue to refine the HMIS system so that it feeds into the most accurate local and Federal data sets. While use of HMIS is not mandated by program providers who do not receive public funds, they are reportedly both welcomed and encouraged to participate in HMIS, though it seems to be the rare non-mandated organization that participates for a variety of reasons, not the least of which is resources – namely time and money. Other funders, public and private, may themselves stipulate participation in HMIS as a condition of funding.

While many providers are part of the HMIS system, most providers also operate their own data systems as HMIS may be a necessary component, but the shared HMIS system often is not sufficient to cover the data and service tracking needed for each individual organization. HMIS in San Diego is currently provided through a service agreement between RTFH and Clarity. Organizational service providers may hold their own contract with Clarity to meet their organizational record needs; however, organizations may use any other variety of vendors or programs developed in-house to manage this. As mentioned, there are service providers in San Diego that are not required to enter into HMIS. Some of those providers may choose to, others may work with RTFH for some unidirectional or bidirectional information exchange, and others operate fully outside the HMIS system.

Other Central Information Hubs with Relevant Data in the Region

The Central Information Exchange system was created in 2018 by the 211 non-profit organization to perform a vital public role in consolidating a community-based central information hub as a collaborative effort between various regional organizations covering wide and disparate aspects of Community, Social, Health and Disaster sectors in our community. The goal of the CIE system is to collectivize and unify data from service providers, government agencies and other stakeholders throughout the region, allowing for cross-disciplinary information exchange across traditional barriers (systems, sectors, geographical or otherwise) to create a more complete and comprehensive system of community care provision.³

211's CIE system has become a standard in community central information hubs, and has allowed for coordination of community care through data integration across multiple systems (including HMIS) to create complete longitudinal records of referral care with capacity to track and close referral loops

³ 211 San Diego, "211 History" <https://211sandiego.org/mission-values/history/>

between case management and service providers, as well as share other key information helpful in providing comprehensive community care.⁴

Basis for Conclusions

Types of Data Sharing Organizations and Why Sharing Aligns with Public Good

There are many organizations with shareable data that are in scope for this standard. This table below, while not exhaustive, lays out the kinds of organizations not currently required to participate in central information hubs and why their homelessness data shared with central information hubs serves a public good and enhances the region’s ability to effectively and efficiently achieve outcome improvements for the individuals experiencing homelessness. It is a summary of the thoughts discussed in the Working Group that led to this standard.

Organization Type	Data to Share	With Whom	Alignment with Public Good / Problems to Avoid when Centralizing Data
Law enforcement	Locations of interactions with homeless individuals, especially if there are legal infractions/citations, and identities	CIE	<ul style="list-style-type: none"> - Permits more accurate and precise movements of individuals to determine community needs, which could focus funder investments - Helps the justice system or any future court system and/or advocates to service those experiencing homelessness specifically anticipate needs and find efficiencies in legal redress for those experiencing homelessness or patterns in enforcement - By sharing with CIE versus HMIS, RTFH and specifically providers operating in HMIS do not have the legal exposure that they may deny housing based on legal background.
Privately funded	Treatment data, assessments	HMIS	<ul style="list-style-type: none"> - Permits publicly funded service providers, who may

⁴ Larin, L., & Silas, J. (2022, May). *HOW TO SHARE DATA: Practical Guide for Health and Homeless Systems of Care*.
<https://www.chcf.org/wp-content/uploads/2022/05/HowShareDataPracticalGuideHealthHomeless.pdf>

service providers			receive the same clients in the future, to build on previously completed treatments and/or see a whole history and potentially access other housing subsidies.
Churches	Services offered, when, and to whom	CIE and HMIS	<ul style="list-style-type: none"> - Permits more accurate and precise movements of individuals to determine community needs, which could focus funder investments - Helps public agencies see where taxpayer investments could be optimized

Alternative Views and Risk Areas That May Need Addressing in Future Revisions

Data sharing and common utilization permits better resource planning and potentially reduces re-traumatization of individuals experiencing homelessness. That said, data sharing and utilization requirements at a systems level increases the risks of violating the privacy desires of individuals experiencing homelessness and the risks of abuse – that is, inappropriate usage of the data – by those who may have access to shared data. This standard may need further refinement to account for these risks, though with this version, the PROS Board asserts that the likely benefits to the outcomes for individuals experiencing homelessness far exceeds the likely costs of these additional possible risks.

Appendix B

Example Specific Applications of this Standard

Municipal Agencies with Law Enforcement Officers and without Homeless Outreach Teams

A local municipal agency with its own police department, but without a homeless outreach team, would recognize initial good faith effort in sharing data once it is onboarded fully as a partner with 211's Community Information Exchange and has reviewed and adjusted internal procedures to reasonably assure that data on interactions with those experiencing homelessness is accurate and complies with the data standards as issued by 211. This would get reported in the first Comprehensive Annual Financial Report (CAFR) for the agency in any notes or relevant management discussion and analysis and any

annual reports by the respective police department that might feed into a CAFR. If the agency has a police oversight body, this information could also be presented in annual performance reviews of the department to that oversight body.

Subsequent good faith effort would be reported as costs incurred to share the data and the average delay time of data transmission in the same annual reports and to the same oversight bodies.

Private Funders with Substantive Portfolio of Grants to Homeless Service Providers

A private funder would demonstrate initial good faith effort to prevent duplicative reporting efforts when it determines it will retrieve information from only the region's central information hubs (effectively requiring their grantees to provide information to the region's central information hubs) and other collaboratives and then deliberately deciding some non-zero amount of finance to give to grantees to assure they are sharing data appropriately pursuant to this standard. Such initial good faith effort would be minimally reported in the next annual Form 990 filing.

Subsequent good faith effort would be demonstrated and reported through the information required pursuant to this standard in Form 990s or the publicly available financial statements. This would allow the private funding organization to monitor its own administrative burdens it imposes and whether they are contributing to shared infrastructure that permits them to receive reports to make thoughtful investment decisions.

Service Providers with Substantive Portfolio of Homelessness Services

A service provider would recognize initial good faith effort in sharing data once it is onboarded fully as a partner with the Homelessness Management Information System and has reviewed and adjusted internal procedures to reasonably assure that the data, when shared, are accurate and complies with the data standards as issued by RTFH. This would get reported in the first Form 990 and any publicly available financial statements or performance reports for the agency.

Because the provider is also likely to utilize the data, it would show good faith effort in data utilization by demonstrating it is not requesting reports from partner agencies (like service providers from whom they may have received referrals)

Subsequent good faith effort would be reported as costs incurred to share the data and the average delay time of data transmission in the same annual reports. If the agency has an audit committee, the audit committee would ensure the auditor evaluates the methods to assure it continues to share data in good faith.

Municipal Agencies with Growing Expenditures in Homelessness Services

Similar to private funders, a municipal agency would demonstrate initial good faith effort to prevent duplicative reporting efforts when it determines it will retrieve information from only the region's central information hubs (effectively requiring their contractors to provide information to the region's central

information hubs) and then deliberating deciding some non-zero amount of finance to give to grantees to assure they are sharing data appropriately pursuant to this standard. Such initial good faith effort would be minimally reported in the Comprehensive Annual Financial Reports and other annual performance reports or materials that support the CAFRs.

Subsequent good faith effort would be demonstrated and reported through the information required pursuant to this standard in subsequent reports. This would allow the public funding organization to monitor its own administrative burdens it imposes and whether they are contributing to shared infrastructure that permits them to receive reports to make thoughtful investment decisions on behalf of the taxpayer.

Appendix C

Notes to Help Readers of Performance or Financial Reports Following This Standard

Potential Investors in a Service Provider

By looking for the disclosures and reportable information specified in this standard, a potential investor in a service provider can determine if an organization is making good faith effort in sharing information with the region in the name of helping individuals experiencing homelessness maximize their chances of successful outcomes. Additionally, investors could compare across providers funds expended by various organizations on data sharing to see who may be more or less efficient or to create internal benchmarks for giving financial support for the data sharing.

Potential Grant Applicants to a Funder

By looking for the disclosures and reportable information specified in this standard, a potential grantee can determine if a grantor is making a good faith effort in reducing their administrative burdens and also pulling information through trusted sources like in our central information hubs.

Public Officials or Staff with Homeless Outreach Teams or Law Enforcement

By looking for the disclosures and reportable information specified in this standard, a public official can see if their law enforcement agency or homeless outreach team is sharing data in good faith with central information hubs.