Exposure Draft

Proposed Standard for Public Good Accounting and Reporting on HMIS Case Note Documentation

This Exposure Draft of a proposed Measurement Standard is issued by the Public Regional Outcomes Standards Board for public comment.

Written comments should be addressed to

Research and Technical Director
Serial Reference No. 2024-ED-001

Issued: 26 April 2024
Comment Period Concludes: 10 May 2024

Notice to Recipients of This Exposure Draft of a Proposed Measurement Standard.

The Board invites comments on all matters in this Exposure Draft. Interested parties may submit comments in one of three ways:

• Using the electronic feedback form available on the PROS Board website at Exposure Documents Open for Comment
• Emailing comments to sdprosboard@sdcta.org, Serial Reference No. 2024-ED-001
• Sending a letter to "Research and Technical Director, Serial Reference No. 2024-ED-001, San Diego Public Regional Outcomes Standards Board, San Diego Taxpayers Educational Foundation, 2508 Historic Decatur Road, San Diego, CA 92106."

The public comment period for this exposure draft ends on 10 May 2024. All comments received are part of the PROS Board's public file and are available at www.sdcta.org/sdprosboard.

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Objective

The PROS Board issues these standards on HMIS Case Note Documentation within homelessness service provision in the San Diego region to reduce the likelihood of clients being re-traumatized when interacting with homelessness service providers. This standard provides measurement and reporting requirements that assist stakeholders in identifying organizations who share case notes that are actionable by preventing retraumatization of individuals experiencing homelessness and increasing the likelihood of the successful attainment of an individual's goals in ending their homelessness.

Intended Regional Effects of Issuing This Standard

Service providers that demonstrate compliance with this standard can assure funders they are substantively sharing actionable case note information with the network of service providers. In other words, through this standard a provider can demonstrate it sets up a potential future provider, with information that could streamline this future provider's services on behalf of the client.

Acknowledging that case notes will never be perfect and that data entry is a human-driven process, this standard creates transparency around an organization's case note assurance practices so that funders and partner organizations can have reasonable assurance that contributions to case notes pursuant to this standard are done reasonably well and not haphazardly.

Through broad compliance with this standard, service providers should be able to minimize and potentially prevent the retraumatization of individuals experiencing homelessness, while also increasing the chances of their clients' successes. Essentially, this standard creates a requirement to document "lessons learned" on engagement with individuals experiencing homelessness so that engagement errors or challenges are less likely to recur.

Other Regional Purposes Outside the Focus of This Standard

This standard acknowledges that there are other systems, like CSTAR, that contain exit information or other notes by service providers in their provision of care, that are eventually imported into the Homeless Management Information System. There are providers, however, who track client information through systems other than Clarity, and not all organizations are sufficiently large to have proprietary systems that can integrate through background server processes, other application programming interfaces (APIs), and other technologies. This standard does not require providers to use any specific system for documenting client information and should not be interpreted as such.

If HMIS includes a **MANDATORY** non-free form set of fields that assures the intent of this standard, then the PROS Board shall reconsider this standard.

Standards of Public Good Accounting and Reporting

Scope and Scope Exceptions

Organizations

These standards apply to those service providers who work with individuals experiencing homelessness in San Diego County who are in scope in PROS-HOUD-Mi-501 *Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness* and have programs that offer case management.

Organizations excluded from these standards are those outside of the scope in PROS-HOUD-Mi-501 *Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness and those that do not have case management.*

See scope and scope exceptions in that principle for more detail.

Programs

These standards apply exclusively to programs which involve case management, including outreach and housing programs.

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.

Continuous Quality Improvement (CQI). This is a deliberate, defined process within an organization that assures responsiveness to customer needs and outcomes.

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.

Data Quality Assurance. Quality assurance is the term used in both manufacturing and service industries to describe the systematic efforts taken to ensure that the product delivered to customers aligns with the contractual and other agreed-upon performance, design, reliability, and maintainability expectations of that customer. In homelessness services, this term applies to the data used in reporting.

Permanent Housing. (Same as US Department of Housing and Urban Development definition) Permanent Housing(PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. Under PH, a program participant must be the tenant on a lease (or sublease) for an initial term of at least one year that is renewable and is terminable only for cause. Further, leases (or subleases) must be renewable for a minimum time of one month. The CoC Program funds two types of permanent housing: permanent supportive housing (PSH) for persons with disabilities and rapid re-housing. Permanent supportive housing is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability. Rapid re-housing (RRH) emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless persons and famil (with or without a disability) as rapidly as possible into permanent housing.

Recognition – Initial and Subsequent Measurement

Organizations in scope shall demonstrate a good faith effort by documenting, for every enrolled client in HMIS Case Notes, a "SITREP"(Situation Report) at a minimum at the time of exit from their program and no more than ninety days since the previous SITREP, not in Permanent Housing, with the information that will assist any future provider with their provision of services. The SITREP should follow this structure.
In the header:
> **Start and end with the words "SITREP," in the Title section;**
> **The date of the "SITREP" in the Date section;**

In the body, the numbering of each section is REQUIRED:
1. **Housing-focused and person-centered goals of the client that have been achieved;**
2. **Housing-focused and person-centered goals of the client yet to be achieved;**
3. **Practices/ triggers for the client that reduce engagement; and**
4. **Practices/ interests for the client that enhance engagement and diversion opportunities.**
5. **Any additional comments that a provider might need to make**

The SITREP must stand on its own. That is, referring to a previous SITREP or causing anyone to have to search through historic case notes does not demonstrate good faith effort. A SITREP is to be performed for individuals who are being case-managed. Please refer to Appendix A for RTFH's definitions of Enrolled, Contact, and Engaged in the Understanding HMIS section. For a specific example of what a SITREP should look like please refer to Appendix B in the SITREP Example section. Additionally, the SITREP section should not contain any information that violates any relevant privacy policies or practices.

Refer to Appendix A for examples of what may be considered as housing-focused.

Initially, an organization shall recognize its good faith effort when the organization has implemented a process, whether manual or technological, that the organization believes meets the good faith requirements above.

Special Note on Organizations with Limited Resources

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

Presentation on Statements of Regional Public Good

Regional Public Good Position

Nothing in this rule requires presentation on the statement of regional public good position.

Regional Public Good Activities

Other than the disclosure requirements below, nothing in this rule requires presentation on the statement of regional public good activities.

Regional Public Good Flow

Nothing in this rule requires presentation on the statement of regional public good flow.

Disclosure Requirements

When reporting in accordance with this standard, organizations in scope shall ensure there is the Mi-503 footnote for the Total Regional Public Good Values Services In Progress or Not Completed section of the statement of regional public good activities. The Mi-503 footnote shall include the following:

1. A ~~link to an~~ description of the organization's review process for SITREPs
2. A description of any action taken based on an organization's review of their SITREPs
3. The record of ~~trends in case note documentation specifically as a proportion of the number of client records where the good faith effort occurred~~ the proportion of client records in which a good faith effort was made.

The initial recognition of good faith effort shall be reported in the organization's first publicly available annual statements of regional public good. ~~The organization should provide an attestation that any organization using its SITREP in the case notes should be able to avoid retraumatization of its clients as well as streamline its services.~~

Subsequent measurements of good faith effort shall be reported at a minimum in all publicly available statements of regional public good. The organization shall account for these measures annually going back to the fiscal year of initial recognition or three years, whichever is shorter. If an organization deems that tracking the measure of this good faith effort, i.e., the proportion of client records where SITREPs are completed appropriately, is not feasible, then they shall disclose why in this footnote.

In addition to above, the notes should specify for the period of time concerned the beginning and end measurements of the proportion of records where the good faith effort occurred.

The organization must disclose the methods by which it maintains its records, and when independently audited or reviewed, the auditor or reviewer should make an evaluative statement whether those records are a material representation of organizational behaviors that meet the intent of this standard.

See Appendix B for example applications of this standard.

Effective Date and Transition

This standard shall be effective 1 July 2024 ~~January 2023~~.

Appendix A:

Background Information

Links to Relevant RTFH Policies
Privacy:
https://www.rtfhsd.org/wp-content/uploads/2020/03/HMISPoliciesAndProceduresAndAppendices_1_27_2020-1.pdf

CES Policies and Procedures:
https://www.rtfhsd.org/wp-content/uploads/RTFH-2021-Revised-CES-Policies-and-Procedures-final.docx.pdf

Non-exhaustive Types Housing Goals (Provided by the City of Carlsbad)
1. Locating Housing
    a. Waitlist applications (HCV, subsidized buildings)
    b. Looking into diversion options (family, friends, temporary or permanent)
    c. Finding roommate options
    d. Calling/online search and applications for affordable buildings
    e. Completing CES screening tool/EHV assessment
    f. Searching for units (in person, online, by phone)
2. Unit Acceptance
    a. Credit History/Repair
    b. Rental History
    c. Documents/ID/Verifications
    d. Debt/Debt to landlords
    e. Criminal History
    f. Applying to units
3. Funding the Unit
    a. Applying for vouchers & other rent supports
    b. Increasing income or benefits
    c. Creating a budget
    d. Saving for deposit or housing needs
    e. Adding benefits (food stamps, utility assistance, etc)
4. Stabilizing in Housing
    a. Tenant education (paying rent, understanding a lease, tenant rights, rules & regulations)
    b. Connecting to community supports
    c. Connecting to health providers
    d. Setting up in-home care as needed
    e. Transportation access
    f. Access to housing needs (furniture, etc)
    g. Locating basic needs near housing
    h. Safety planning (emergency contacts, who shouldn't know where I live)

Basis for Conclusions

Varying Practices in Case Notes

Historically the Case Note section in Clarity has been used to store notes about the client. When a client moves from one provider to another, however, information is often lost since going through previous case notes is cumbersome, and past case notes may not tell the full story. As a result, the client is asked similar or the same questions as they have been previously asked, which can result in retraumatization. The introduction and adherence to this template across providers can introduce efficiency and reduce the likelihood of client retraumatization.

Information Useful to a Service Provider

The SITREP is based on discussions from service providers in the working group that they deem is useful to continue the client's path to end homelessness without retraumatization.

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

This rule is not for all types of case notes. For example, some interactions between outreach workers and people experiencing homelessness are sufficiently brief and uninformative that it is infeasible to write a SITREP. In the future, if there are other measures that are in place to prevent retraumatization then this rule will need to be reviewed.

Appendix B

Example Specific Applications of this Standard

Publicly-Funded Service Provider

An organization that adheres to these standards would ensure that their frontline staff are adequately trained so that they not only understand the SITREP format but why it is crucial they record information as shown above. Additionally, management should have systems in place so that they can confidently attest that any other provider that might take over after them would be able to pick up where they left off.

Management at a service provider have three data points to interpret from this standard: the processes for reviewing SITREPs, action taken based on SITREP data, and the proportion of client reports where a good faith effort was made to log a SITREP. Management should interpret the proportion of reports where a good faith effort was made in the context of the organization's review process. Management at all levels

==highlight==may dialogue with staff at their organization on how to improve the SITREP review process or recommend action to take based on SITREPs.==

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

Potential Investors in a Service Provider

By seeing that an organization is adequately documenting the services and goals of a client, funders are reassured that the service provider is running efficiently by not repeating steps, preventing retraumatization, and is working towards the goal of ending homelessness in San Diego.

==Potential investors in a service provider should also review an organization's SITREPs in the context of that organization's SITREP review process. For example, organizations with more thorough review processes might report a lower proportion of client reports where a good faith effort was made to produce a SITREP. Potential investors should also thoroughly review the actions organizations take based on SITREPs. If organizations use SITREPs to help improve their processes, that is an indication that the organization is committed to the intent behind SITREPs, which is to avoid re-traumatizing clients. Potential investors should also be aware that the proportion of case notes where a good faith effort was made will depend significantly on the type of program.The proportion will likely be lower in outreach programs than in housing programs because case workers have less regular interactions with clients==

A SITREP Example

1. This is how the overview of a SITREP and what it should look like in the system

CLIENT NOTES				ADD NOTE ⊕
Title	Category	User Full Name	Date	
SITREP Alpha Project for the Homeless	No Category	Danny Byers	10/21/2022	
SITREP Alpha Project for the Homeless	No Category	Danny Byers	10/12/2022	

2. This is what the SITREP should look like when it is completed

Title	SITREP
Category	No Category
Agency	Alpha Project for the Homeless
Date	10/21/2022 📅 **Time Tracking** Select ⌄ Select ⌄
Note	

> **B** *I* ≔ ≔
>
> 1. Goals of the client yet to be achieved: Needs an income
> 2. Goals of the client that have been achieved: Has received ID
> 3. Practices/triggers for the client that reduces engagement: Does not like talking about the past
> 4. Practices/interest for the client that enhance engagement: He likes to talk about sports
> 5. No additional comments

It is crucial that each of these sections starts with the corresponding number. The list feature in the notes section can be used to make this less cumbersome.

While this method does take more time to maintain structure, there is consensus that the added time will lead to a greater net positive for the region as it substantially reduces bottlenecks.

Some methods that have been suggested to help make this principle easier to follow are to have this general structure in the Notes app so that it can be more easily copied and pasted over.

Illustrative Examples

Organizations in the scope of this standard can make reports in compliance with this standard in their SoRPG.

								Mi-502: Our organization has recieved a data quality report for June 1st - December 31st 2021 and another data quality report from January 1st - June 30th 2022. According to our records management did not take any action after analysis. Of the 1,500 data entries that we had across the 2 reports we had 100 instances of low-quality data. It took us 2 months to update our low-quality data from our most recent report.
Total Regional Public Good Value Services In Progress or Not Completed								**Mi-503:** Our management review process for SITREPs can be found here: www.reviewprocess.company.com. There were not management directives taken after review of our SITREPs. Of our 1,500 clients 1,100 SITREPs were completed in good faith effort.