

Massachusetts Homelessness Data Warehouse Proposal

Frequently Asked Questions

1. What types of data will be included in the Data Warehouse (DW)?

HMIS will be included in the DW and then DHCD-EA data will be added to the DW at a later date. Given this timing, most of the FAQs below relate to HMIS data and CoC participation.

A full HMIS data set will be exported by the CoC to the DW. All data will be identifiable at first; the de-identification occurs within the DW. With this information, the DW will produce two types of integrated datasets:

- 1. **Data Set A:** De-duplicated, anonymous and de-identified records based on a subset of HMIS data elements*
- 2. **Data Set B:** De-duplicated, identifiable client-level records based on full HMIS data sets.*

Data Set A includes:

- 3. all HUD HMIS project descriptor data elements (2.1 – 2.8);*
- 4. HUD HMIS universal identifier elements that describe demographics (3.4 – 3.7);*
- 5. all HUD HMIS universal project stay elements (3.8 – 3.917); and*
- 6. all HUD HMIS program specific data elements (4.2 – 4.18).*

Data Set B includes the limited data set that will be used to support coordinated entry eligibility and referral tasks:

- 7. 2.1 Organization Identifiers*
- 8. 2.2 Project Identifiers*
- 9. 2.3 Continuum of Care Code*
- 10. 3.1 Name*
- 11. 3.2 Social Security Number*
- 12. 3.3 Date of Birth*
- 13. 3.6 Gender*
- 14. 3.7 Veteran Status*
- 15. 3.8 Disabling Condition*
- 16. 3.10 Project Start Date*
- 17. 3.11 Project End Date*
- 18. 3.12 Destination*
- 19. 3.16 Client Location*
- 20. 4.18 Housing Assessment Disposition*
- 21. 4.43 Last Permanent Address¹*

2. What is required of a CoC to participate in the DW?

The DW will utilize HUD's current data collection and reporting standards to develop regional and statewide reporting capabilities. As such, a commitment to data quality and monthly file uploads is all that is required to participate. Implementing standard privacy and security standards will also be required, if the CoC has not already done so. By sharing this data, CoCs will

¹ Zip Code of Last Permanent Address was a Universal Data Element (3.10) until the 2014 HUD HMIS Data Standards but is no longer a Universal Data Element. Last Permanent Address is a current data element for VA SSVF participating projects (V5 Last Permanent Address).

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be gain access to aggregate reports based on de-duplicated, anonymous, de-identified data included in Data Set A.

Those CoCs that would like access to de-duplicated, identifiable client-level records (Data Set B), would need to agree to ensure that policies and procedures are compliant with state privacy laws as well provide monthly data exports into the DW. Specifically, to have access to de-duplicated, identifiable client-level records available in Data Set B (see Tier 2 below) , a CoC must meet the following 4 DW Requirements:

- 1. Agree to use a standard statewide Release of Information (ROI) that complies with both federal and state laws and work with homeless individuals to sign this ROI.*
 - ROIs would include language that states: "I authorize my data to be shared in personal and identifiable form for the purposes of care coordination and determining program eligibility. This data will be shared with other Continuums of Care to make referrals and identify housing options on my behalf."*
 - Local ROIs may be used if 1) it meets both state and federal privacy laws; 2) it is standardized across the CoC, and 3) it includes standardized data sharing verbiage that permits client-level data to be shared in a warehouse environment*
 - CoCs would also need to have a system for tracking which individuals have signed the ROI to ensure only data about those individuals is shared*
- 2. Agree to update data privacy and security standards to ensure that they comply with both federal and state laws (template language will be provided)*
- 3. Agree to export a standard CSV file of HUD-defined HMIS data elements to the warehouse on a monthly basis*
- 4. Agree to participate on a statewide Homelessness DW Governance Board*

Although not extra work, CoCs would also need to agree to continue to meet HUD standards and requirements related to:

- Privacy and security standards*
- Data quality monitoring*
- Technical and functional requirements*
- End user monitoring*
- Programming specifications*
- Report generation*

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3. What are the different levels of access to data in the DW?

To ensure the safety and privacy of all data, access will be controlled through a two-Tier system:

	Who has Access?	Type of Data and Reports
TIER 1	Access by the public, state agencies, policymakers	DATA SET A De-duplicated, anonymous and de-identified data
	Access by CoCs that do not meet established DW requirements	Online “canned” aggregate reports
TIER 2	Access by CoCs that meet established DW requirements	DATA SET B De-duplicated, identifiable client-level records
	Access by homeless providers that are part of a CoC that meets the DW requirements	Aggregate reports as well as individual reports related to utilization of services and housing
	Access by researchers that are covered by institutional review boards	

4. What type of data will the public have access to as part of the DW?

The public will have Tier 1 level access and be able to go online and generate “canned” dashboard reports based on de-duplicated, anonymous and de-identified records available in Data Set A. For example, a public user could request a report of the number of chronically homeless people in each CoC that are veterans. These reports will be generated online, similar to the HUD Exchange.

5. What type of data will “state agencies” have access to as part of the DW?

State agencies will have the same access to data as the public (see above). However, DHCD, based on its multiple roles as the EA administrator, Collaborative Applicant for the Balance of State CoC, and the HMIS Lead for 7 CoCs, will have access to data at the Tier 2 level.

As needed, state agencies may be able to access at a Tier 2 level as part of approved research projects or through Integrated Data System protocols (see below).

6. What type of data will CoCs have access to as part of the DW?

CoCs that meet the DW requirements described above will have Tier 2 level access: de-duplicated, identifiable client-level records available in Data Set B.

CoCs that do not meet the DW requirements described above will have Tier 1 level access: De-duplicated, anonymous and de-identified records available in Data Set A.

7. What happens if a CoC wants only Tier 1 access?

CoCs that choose not to meet the DW requirements will only have Tier 1 level access and will only be able to see canned aggregated dashboard reports online based on the de-duplicated, anonymous and de-identified records available in Data Set A.

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Since these CoCs have not committed to using a ROI and implementing data privacy/security policies that meet both state and federal laws, they will not be able to submit data to the DW. Instead, the DW will run reports based only on the EA data available for that CoC's geography.

In addition, CoCs that choose not to meet the DW requirements will not receive any state DW funding nor be a member of the statewide Homelessness DW Governance Board.

8. What type of data will homeless providers have access to as part of the DW?

Homeless providers that are a member of a CoC that meets the DW requirements will have Tier 2 level access.

Homeless providers that are a member of a CoC that does not meet the DW requirements will have Tier 1 level access.

Homeless providers that are not members of a CoC will have Tier 1 level access, same as the general public.

9. What are the benefits to a CoC to participating in the DW?

As a result of the comprehensive data warehouse, all CoCs will be able to get an accurate and complete profile of the homeless persons in their area, and measure performance on ending homelessness. By participating in the DW (i.e., meeting the DW requirements), CoCs will be able to share data among the 15 CoCs and, ultimately, the EA system. With this access, a CoC will be able to identify trends in migration among CoCs, identify emerging needs among specific subpopulations, and develop regional multi-CoC strategies and responses.

In addition, those CoCs that meet the DW requirements will be able to ensure that data policies meet not only federal but also state privacy requirements, allowing the CoC to better partner with non-homeless organizations that require this increased level of security.

Finally, as a result of the data warehouse the state will be better able to develop strategies and deploy resources to fund CoCs in ending homelessness, particularly among specific subpopulations such as youth, veterans, and people experiencing chronic homelessness. All of these efforts would be strengthened with better statewide data about the characteristics of homeless people across the state.

10. What are the benefits to a person experiencing homelessness to agreeing to have their data shared in the DW?

The DW will enable a person's history and utilization of homeless services across the state to be more readily accessible. This will allow for not only better care coordination but also the possibility of being determined eligible for services/housing that are targeted to specific subpopulations, such as people who are chronically homeless. For example, based on information available in the DW it may be possible to determine that an individual's homeless episodes across different CoCs help document chronic homeless status.

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It is important to note that if an individual refuses to sign the statewide ROI then his/her data would not be added to the DW at all.

11. Will there be a cost to participate in the DW?

The state plans to identify funds to implement the DW and maintain it for a period of time. This would include providing some funds to those CoCs that would incur costs to build out their HMIS to track ROI completion and/or to generate CSV reports to export to the DW.

CoCs will need to invest staff and meeting time to update data privacy and security standards as needed (note that template language will be provided) and educating HMIS contributing organizations regarding any changes.

Homeless providers will need to invest staff time in working with people experiencing homelessness to sign the new ROI.

12. Will the data available be “real time”?

No. Initially, the DW will receive monthly exports from the CoCs and any queries/reports will reflect this timing. This schedule is similar to many Coordinated Entry Systems that currently exist.

13. What is the statewide Homelessness DW Governance Board mentioned above?

In order for the Homelessness DW to be successful and to continue to be a useful tool to all parties over time, this proposal includes the creation of a Governance Board. The makeup and official duties of the Board have not yet been determined but each CoC that participates in the DW at a Tier 2 level would be expected to have a representative on the Board.

In the coming months as part of the DW implementation, CoCs and key stakeholders would help define the structure and responsibilities of this Board.

14. What safeguards will be in place to make sure that the data in the DW is not compromised?

Privacy and security protections will be in place to ensure the protection of all data contributed to the warehouse, including:

- 5. Compliance with the Commonwealth of Massachusetts’ Enterprise Information Security Policy*
- 6. The use of physical, electronic, and procedural safeguards that meet or exceed industry standards to protect data in transit and at rest*
- 7. Tracking of system access, user authentication, and password controls through the use of security logs and audit trails*

15. Will the system will be able to export back into HMIS?

No. The DW will allow user to run reports and see specific data but will not be directly exporting/sending data back to the CoCs or homeless providers.

16. What types of reports will the DW be able to generate? Will it be able to produce APRs, AHARs, or reports related to Systems Performance Measures?

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The data warehouse is designed to integrate data across CoC geographic areas and systems of care and is not intended to replace or duplicate the role of your community's HMIS. Because the DW is merely aggregating data across multiple sources and is not an actual statewide HMIS, it will not be able to produce project-related reports such as Annual Performance Reports (APR) or CoC-wide HUD required reports such as Annual Homeless Assessment Report (AHAR) submissions. Although some of the "canned" aggregate reports may relate to HUD's Systems Performance Measures, CoCs should not rely on the DW to produce these required HUD reports.

17. Can a CoC use this system to meet its obligations regarding implementing and maintaining a Coordinated Entry System (CES)?

HUD does not require CoCs to use their HMIS (or another coordinated entry database) as part of the coordinated entry process. However, the hope is that CoCs will be able to leverage the DW to strengthen their existing CES by documenting homeless or chronic homeless status, coordinating care, and tracking referral outcomes (i.e. successful project enrollments, even in neighboring CoCs).

18. What if our CoC's HMIS does not currently meet HUD's established standards for data quality and participation/bed coverage, can we still participate in the DW?

If a CoC meets the DW requirements described above including using the standard ROI and updating policies related to data privacy and security, then it can participate in the DW at a Tier 2 level access. CoCs that do not meet HUD's requirements with regards to data quality and/or bed coverage but do meet the DW requirements are allowed Tier 2 level access.

*CoCs are expected to meet all of HUD's requirements for HMIS including those related to bed coverage, operating a single HMIS, etc. CoCs are encouraged to put in place strategies to address any issues with HUD HMIS compliance. **No state funding made available through the DW can be used assist CoCs in meeting HUD's HMIS requirements and standards.***

19. Although my CoC has designated one HMIS for the entire CoC, there are some providers that are using a separate data system and have to enter data into their own system as well as HMIS. Will the DW help with this issue?

*According to HUD CoC Program interim rule, CoCs are responsible for designating and operating a single HMIS for the geographic area. **No state funding made available through the DW can be used assist CoCs in meeting HUD's HMIS requirements and standards.***

While bed coverage and HMIS participation are priorities for CoCs to continue addressing, the DW will be aggregating currently available HMIS data only and will not be collecting data from any other data systems that CoCs currently utilize.

20. Are CoCs required to participate in the DW? What if the CoC doesn't opt to participate in the DW now but wants to in the future?

No. At this time there is no requirement that CoCs participate in the DW. There are many benefits to participation, as outlined above; CoCs that choose not to participate in the DW will not be able avail themselves of these benefits including valuable shared data and reports.

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Although the state is committed at this time to identifying funding to develop and maintain the DW, it is not clear whether there will be state funding available in the future to add CoCs to the DW that chose not to participate at this time.

21. How will the DW fit in with the State's plans for an Integrated Data System (IDS)?

The Commonwealth of MA has been chosen to receive technical assistance from the Actionable Intelligence for Social Policy (www.aisp.upenn.edu/) to develop an IDS. The ICHH is working closely with other state agencies to determine how the Homelessness DW will interact with the IDS in the future. The Homelessness DW Governing Board will be an active part of these discussions.

22. What is the estimated timeline for starting the DW?

The state hopes to designate the funds and identify an agency to create the DW June 30, 2018.

23. What if a CoC has additional questions related to the DW?

CoCs that have questions related to the DW should feel free to reach out to any of the following people:

- *Linn Torto at <mailto:linn.torto@state.ma.us> (Massachusetts ICHH)*
- *Emily Cooper at emily.cooper@state.ma.us (Executive Office of Elder Affairs)*
- *Ryan Burger at ryan.burger@icf.com (HUD Technical Assistance provider)*

Note that these individuals are available to attend CoCs meetings in person or via phone to discuss this project, hear direct feedback, and answer any outstanding questions.

24. How does a CoC indicate that it wants to be part of the DW?

Those CoCs that agree to be part of the DW must conduct an official CoC vote endorsing this participation and send written notification of this approval to Linn Torto at linn.torto@state.ma.us by February 15, 2018.

At a later date the HMIS Lead, on behalf of the CoC, will be required to enter into an DW Participation Agreement.