

Purpose

As part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, many communities will receive significant one-time allocations of funding through the Emergency Solutions Grants (ESG) program, referred to as “ESG-CV” funds, that can be used to quickly rehouse individuals and families experiencing homelessness and disproportionately at risk of COVID-19. Many communities will fund [Victim Service Providers \(VSP\)](#) through ESG-CV who have not previously been a recipient of ESG funds. The intent of this document is to outline the database and reporting requirements that will be necessary of any VSP that is a recipient of ESG-CV funds.

While it is too early in the COVID-19 pandemic for reliable nationwide data, reports from communities across the U.S. and other countries point to [increases in domestic violence](#). If you are a VSP, the ESG-CV funds can be a good resource to update your facilities, program requirements, and data reporting systems to be responsive to the needs that arise as a result of COVID-19.

Having adequate documentation and reporting systems is essential for a VSP to effectively manage ESG-CV funds. This document will help you understand [the type of reporting system that VSPs are required to set up](#). For technical assistance related to the [Violence Against Women Act \(VAWA\)](#), please reach out to the [Safe Housing Partnerships](#).

What are the expected data collection requirements for an agency receiving ESG-CV funds?

Any organization receiving ESG-CV funds, or ESG funds in general, must document clients served using a real-time, administrative database. Non-VSP providers are required to utilize the Homeless Management Information System (HMIS). HMIS is a database shared by all non-VSP homeless service providers to document longitudinal homeless services for all persons experiencing homelessness within the community. HMIS is managed by the Continuum of Care (CoC) [HMIS Lead Agency](#). Your local HMIS Lead can be [identified here](#). VSPs are prohibited by the VAWA from using HMIS. Instead, VSPs must use a [comparable database](#) to document the clients served with your ESG or ESG-CV funding. HUD created a [decision tree](#) to help navigate whether a provider should use a comparable database.

What is a Victim Service Provider?

A VSP is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs. A VSP is a designation at the **agency** level, not the project level. HUD standards prohibit VSPs from entering a person’s identifiable information¹ into HMIS. Instead, a VSP is required to collect Personal Identifying Information (PII) and other HUD-required data in a relational database that is comparable to HMIS, referred to as a comparable database.

If a provider is not a VSP based on the definition, but they receive funds from the Office of Violence Against Women (OVW) programs, Office for Victims of Crime (OVC) programs, or Family Violence Prevention and Services Act (FVPSA) for agency-wide or for agency administrative purposes, all projects operated by the agency, regardless of project type, are prohibited from entering PII into HMIS and they would use a comparable database instead. Review [When to Utilize a Comparable Database](#) for more information.

¹ The HMIS Standards use the term Protected Personal Information (PPI). For a homeless provider subject to the standards, PPI is the same as the more commonly used Personally Identifiable Information (PII). This document uses the terms interchangeably.

VAWA and the [Family Violence Prevention and Services Act \(FVPSA\)](#) contain strong, legally codified confidentiality provisions that limit VSPs from sharing, disclosing, or revealing victims' PII, 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.

VAWA defines PII as information for or about an individual—including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking such as a first and last name, a home or other physical address, contact information, a social security number, date of birth, racial or ethnic background, or religious affiliation—that, in combination with any other non-personally identifying information, would serve to identify any individual. PII also may include information that is encoded, encrypted, hashed, or otherwise protected.

Comparable Database Considerations

What is a comparable database?

A comparable database is a relational database that meets all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications.

A relational database is a collection of information that organizes data points with defined relationships for easy access and reporting. Excel and Google Sheets (spreadsheets) are **not** relational databases and do not meet the standard to be considered comparable in nature.

It is important to select a comparable database that meets these requirements and identify it in any procurement or monitoring of ESG-CV funds. Software that does not meet the baseline comparable database requirements will not be able to fulfill the management and reporting requirements that are required of ESG-CV recipients and subrecipients. Working with your HMIS Lead on the selection of a comparable database can help provide the insight on data management and reporting needs necessary to meet minimum standards.

Any information generated from a comparable database that will be used for shared reporting must be aggregate level data only with no PII. Information entered into a comparable database is confidential and cannot be shared with any third parties outside of the agency without written, [time-limited client consent](#).

Key considerations and basic questions to ask when selecting a comparable database and a vendor.

- Understand federal requirements. Review the U.S. Department of Justice's VAWA and [Frequently Asked Questions \(FAQs\) on the VAWA Confidentiality Provision](#). Also review [HUD's Technical Standards](#) and the [2020 Data Standards](#). Engage with your HMIS Lead who understands the data collection and reporting requirements and can help you ask the right question when making a selection.
- Consider overall costs of the system. Many systems offer a licensing fee structure; be sure cost breakdowns include upgrades, technical support, training, hosting fees, annual maintenance fees, data migration (if applicable) for initial setup, etc.
- Identify the training your agency needs: types of training included (e.g. live on-line, live on-site, recorded sessions), training materials/documentation, and frequency of training.
- Understand technical support needs: support types (e.g. email, phone, online ticketing system) and the days/time each type is available, response times, free vs. fee-based technical support.
- Plan for contract monitoring. Outline and discuss the contract monitoring process, the frequency of the monitoring, and the implications for not meeting expectations.
 - If a VSP already has a contract with a comparable database vendor, work through that contract to ensure the compliance requirements outlined in this document are met.

Resources

[HMIS Lead Contact Information](#)

VSP grantees should connect with their HMIS Leads for their expertise in the requirements of their data collection systems.

[HUD Workshop: Implementing Effective Contract Negotiation and Relationship Management Strategies 101](#)

This session reviewed the key components of a contract, the skills necessary to effectively negotiate an agreement, and strategies to hold the HMIS software provider accountable under such contracts.

[HUD Workshop: HMIS Project Monitoring](#)

This session ensured that CoC and HMIS leadership have the skills necessary to monitor providers and users participating in HMIS in accordance with Federal Partner HMIS standards.

[Safe Housing Partnerships](#)

Safe Housing Partnerships is the website for the Domestic Violence and Housing Technical Assistance Consortium. The Consortium is an innovative, collaborative approach to providing training, technical assistance, and resource development at the critical intersection of domestic and sexual violence, homelessness, and housing.

[Frequently Asked Questions \(FAQs\) on the VAWA Confidentiality Provision](#)

FAQ document from the U.S. Department of Justice, Office on Violence Against Women outlining VAWA confidentiality questions.

[HMIS Software Vendor Capacity Checklist](#)

The checklist provides an overview of both HUD HMIS requirements of an HMIS software as well as common technical and functional features that many communities require or expect. While designed for HMIS, this checklist provides a set of standardized criteria that the VSPs may determine their comparable database should meet. These criteria generally are not to measure compliance, but rather to ensure that the software vendor provides a software that meets the needs of the community.