

Philadelphia Continuum of Care HMIS Data Quality Plan

Background

For more than a decade, Congress has expressed the need for better local and national information about persons experiencing homelessness in a series of Congressional directives, beginning with the FY 1999 U.S. Department of Housing and Urban Development (HUD) Appropriations Act. In 2001 Congress directed HUD to take the lead in requiring every jurisdiction to have unduplicated client-level data within three years. In subsequent years, Senate and House Appropriations Committee reports have directed HUD to assist communities in implementing local Homeless Management Information Systems (HMIS) and to develop an Annual Homeless Assessment Report (AHAR) that is based on HMIS data.

HMIS is now used by the following federal partners and their respective programs in the effort to end homelessness:

- U.S. Department of Health and Human Services (HHS)
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Veterans Affairs (VA)

Philadelphia Continuum of Care's (CoC) HMIS is a client information system designed to record and store client-level information on the characteristics and service needs of persons experiencing homelessness. HMIS assists the Philadelphia CoC to become better informed about the extent and nature of homelessness over time. Specifically, HMIS can be used to produce an unduplicated count of persons experiencing homelessness, understand patterns of service use, measure the effectiveness of homeless programs, and assist in the efficient provision of services to homeless persons. HMIS is also used to help with system planning and design including long-term strategic planning and shorter-term evaluations and interventions.

The City of Philadelphia Office of Homeless Services (OHS) has been designated by the Philadelphia CoC as the HMIS Lead Agency in accordance with federal HMIS rules and regulations.

Purpose

The purpose of the Philadelphia Continuum of Care Homeless Management Information System Data Quality Plan (HMIS Data Quality Plan) is to standardize expectations and provide guidance to HMIS-participating projects on the extent, completeness, and quality data elements entered into HMIS to meet participation and reporting requirements established by HUD and the federal partners.

In doing so, the CoC hopes to streamline the process of completing Annual Performance Reports (APR) for HUD and submitting information for the Annual Homeless Assessment Report in full compliance with HUD's expectations. In addition, the HMIS Data Quality Plan is intended to assist the CoC in its preparations for the new system-wide performance measures contained in the McKinney-Vento Homeless Assistance Act as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Further, the improvement of HMIS data will assist the CoC to continue to achieve a high score in the competitive annual application for CoC Program funding.

Development Process

The HMIS Data Quality Plan was developed through a collaborative effort across homeless service providers and spearheaded by the HMIS & HEARTH Data Subcommittee of the McKinney Public/Private Strategic Planning Committee, which included representatives from the following organizations: City of Philadelphia Office of Homeless Services (formerly Office of Supportive Housing), People's Emergency Center, Kutztown University, Project HOME, Dignity Housing, The Salvation Army Red Shield Family Residence, SELF, Inc., and Temple University.

Definitions

Project vs Program: Across the federal agencies the terms project and program are used differently. In this document, and for the purposes of data collection in HMIS, a program refers to the federal funding source (e.g., HUD CoC, HHS PATH, VA SSVF ...etc.). A project refers to a distinct unit of an organization, which may or may not be funded by HUD or the federal partners, that provides services and/or housing and is identified by the CoC as part of its service system. A continuum project can be classified as one that provides housing (housing project) or one that does not provide housing (services project). Projects may enter data directly into HMIS or submit data extract files for upload into HMIS. Projects which submit via data extract have chosen to participate in HMIS in this way because they have their own proprietary data systems in place to track and maintain data on their constituents. They create an annual export for import into HMIS.

Housing Project: Provides overnight accommodations and whose primary purpose is to meet the specific needs of people who are experiencing homelessness. This includes projects classified as the following under the data element Project Type: Emergency Housing, Safe Haven, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, Permanent Housing with Services, and Permanent Housing: Housing Only.

Services Project: Does not provide housing and whose primary purpose is to provide services that meet the specific needs of people who are experiencing or at-risk of homelessness. This includes projects classified as the following under the data element Project Type: Coordinated Assessment, Homelessness Prevention, Street Outreach, Day Shelter, Services Only, and Other.

HMIS Universal Data Elements (UDE) are elements required to be collected by all projects participating in HMIS, regardless of funding source. They establish the baseline data collection requirements for all contributing CoC projects; and are the basis for producing unduplicated estimates of the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stays and homelessness over time.

Program Specific Data Elements (PSDE) differ from the Universal Data Elements in that no one project must collect every single element in this section. Required data elements are dictated by the reporting requirements set forth by funding source.

HMIS Data Quality refers to the extent that data recorded in HMIS accurately reflects the same information in the real world. To meet the Philadelphia CoC's goal of presenting accurate and consistent information on homelessness, it is critical that HMIS have the best possible representation of reality as it relates to homeless people and the programs that serve them. Specifically, the goal is to record the most accurate, consistent and up-to-date information in order to draw reasonable

conclusions about the extent of homelessness and the impact of homeless services and to utilize for planning and evaluation purposes.

HMIS User means the individual who uses or enters data in an HMIS or a comparable database approved by the CoC.

HMIS Lead means the entity designated by the Continuum of Care in accordance with the HMIS Proposed Rule2 (24 CFR Part 580) to operate the Continuum’s HMIS on the Continuum’s behalf.

HMIS System Administrator means the individual(s) whose job it is to manage the HMIS implementation at the local level: enrolling programs and managing appropriate use, supporting users through connection to, or direct provision of, user training, and overseeing system setup.

Applicability of Data Quality Standards

The Data Quality Standards contained herein are applicable to all HMIS participating projects, including projects that enter data directly into HMIS and projects that submit data extract files for upload into HMIS. For those projects that submit data extract files, the HMIS Data Quality Standards apply to the entry of data into the agency’s in-house client information system. The Standards also apply to all actions taken by providers leading up to the creation of their extract files; in other words, all information entered into the data systems used to create extract files must conform to the guidelines set out in this document.

Key Documents

Key documents needed as supporting references to this document are listed below:

- a. Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 (“HUD HMIS 2004 Final Notice”), including subsequent rule releases, and
- b. U.S. Department of Housing and Urban Development, Office of Community Planning and Development, 2017 Homeless Management Information System (HMIS) Data Standards: Manual and Dictionary Version 1.2, July 2017 (“2017 HMIS Data Standards”), including succeeding revisions, and
- c. The McKinney-Vento Homeless Assistance Act as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.

HMIS Data Quality Standards

The HMIS Data Quality Standards for the Philadelphia CoC are split into six (6) categories: Timeliness, Completeness, Accuracy, Consistency, Monitoring, and Incentives. Unless otherwise noted, all HMIS participating projects, including those that provide data extract files for upload into HMIS, are expected to achieve and maintain the Data Quality Standards.

Training of HMIS system users is recognized to be important in assuring the completeness, accuracy, and consistency of data. To that end, data quality will be supported through timely and appropriate system training, including the utilization of methodologies such as Train-the-Trainer and Computer-Based Training (CBT).

1. Timeliness

The purpose of this timeliness standard is to reduce human error that occurs when too much time has elapsed between data collection (service transaction) and data entry into HMIS. The individual doing the data entry may be relying on handwritten notes or his/her own recall of a case management session, service transaction, or project exit date; therefore, the sooner the data is entered, the better chance the data will be correct. Timely data entry also ensures that data is as close to “real-time” as possible and accessible when it is needed – either pro-actively (for monitoring purposes, publishing information to increase awareness, or to meet reporting requirements) or reactively (in response to a request for information or to respond to inaccurate information).

1.1. Timeliness Standard

All Projects will ensure that data elements for new clients, services, and entry/exits are entered in a timely manner into HMIS.

Data must be collected, at a minimum, at project entry, during project enrollment, and at project exit according to the baselines found in the Appendix. All projects are encouraged to collect all of the required Data Elements as close to each client’s project entry and exit as possible. In addition:

- HMIS participating agencies’ Emergency Housing projects must collect the required Data Elements within the timeframe established in the Social Worker/Case Management Performance Standards and Homeless Management Information System Standards (HMIS) found in the OHS Emergency Housing Standards.
- Homelessness Prevention, Housing Retention, and Rapid Re-housing Projects must collect the HUD-required Data Elements in accordance with the timeframes set forth in the most recent Request for Proposals as well as the project’s most recent OHS contract documents.

Once collected, projects will enter the data in HMIS according to the following timeframes:

- HMIS participating agencies’ Emergency Housing Projects: All required UDEs and PSDEs will be entered within 24 hours of the data collection.
- Transitional and Permanent Supportive Housing Projects receiving funding through OHS and/or the McKinney-Vento Act: All required UDEs and PSDEs will be entered within three (3) days of data collection.
- OHS Centralized Intake Sites, Service-Only, and After Hours Processing Sites: All required UDEs will be entered at the time of data collection.
- Homelessness Prevention, Housing Retention, Outreach and Rapid Re-housing Projects: All required UDEs and PSDEs will be entered at the time of data collection.
- OHS Emergency Assistance and Response Unit: All required UDEs and PSDEs will be entered at the time of data collection.
- Non-Contracted Emergency Housing, Transitional Housing, and Permanent Supportive Housing Projects (Projects not receiving funding through OHS and/or

the McKinney-Vento Act): All UDEs will be entered within three (3) days of data collection.

2. Completeness

The purpose of completeness is to ensure sufficient demographic and service use data is collected to facilitate confident reporting and analysis on the extent and characteristics of persons experiencing homelessness in Philadelphia including:

- Unduplicated counts of clients served at the local level
- Patterns of use of people entering and exiting the homeless assistance system
- Evaluation of the effectiveness of homeless systems
- Systems planning for future housing and service needs

In effect, complete data tells the full “story” of homelessness.

2.1. Completeness Standard

All Projects will ensure each of their required Data Elements is entered into HMIS for all clients served by the project. Please, refer to the table below for a detailed listing of the required Data Elements. In addition, all Projects will make reasonable efforts to limit the percentage of missing/null, don't know, refused, and data not collected entries to 10% or less.

3. Accuracy

The purpose of accuracy is to ensure that the data housed in HMIS is the best possible representation of reality as it relates to people who are experiencing homelessness and the projects in which they participate.

3.1. Accuracy Standard

All Projects will ensure that data entered in HMIS accurately reflects the information provided by the client. Project staff will not knowingly enter into HMIS inaccurate or false information. To the extent that clients and other agencies supplying information have provided accurate data, HMIS users are responsible for the accuracy of the data they enter into the HMIS. Immediately upon discovery, inaccurate or outdated data will be updated by the project. In addition, responses of “Don't Know” and “Refused” will be updated immediately once the information is known.

4. Consistency

The purpose of consistency is to ensure a common interpretation of questions, answers, and which fields need completion in HMIS.

4.1. Consistency Standard

All data required to be in HMIS will be collected and entered in a common and consistent manner across all Projects. To that end, all HMIS users will complete an initial orientation before accessing the HMIS. As part of the orientation, all new HMIS users will review Sections 3 and 4 of the 2017 HMIS Data Standards, which outlines the Universal and Program Specific Data Elements, including their rationale, collection point(s), data collection instructions, and response category descriptions. All existing HMIS users are encouraged to review this document on a quarterly basis.

5. Monitoring

The purpose of monitoring is to ensure that the HMIS Data Quality Standards are met to the greatest possible extent and that data quality issues are quickly identified and resolved. When data quality benchmarks are met, reporting will be more reliable and can be used to evaluate service delivery, project design and effectiveness, and efficiency of the system. All HMIS participating agencies are expected to meet the data quality benchmarks described in this document. To achieve this, HMIS data will be monitored and reviewed in accordance with the schedule outlined in this section. All monitoring will be conducted by the OHS with the full support of the CoC.

5.1. Monitoring Standard

All Projects are expected to meet the HMIS Data Quality Standards described in this document. Each Project is responsible for monitoring its own data and establishing internal data quality control procedures. Projects are encouraged to utilize all applicable reports that can be generated directly from HMIS. In addition, the HMIS Lead Agency will monitor HMIS data on the project and system levels in accordance with this Data Quality Plan. Projects that fail to meet the data standards will be asked by the HMIS Lead Agency to submit a written plan that details how they will take corrective action and the timeline for doing so. The plan will be submitted to and monitored by, the CoC Advisory Committee. Data quality scoring by each agency plays a significant role during funding consideration, agencies failing to meet minimum Data Quality Standard requirements may face funding loss or reduction.

5.2. Roles and Responsibilities

- **Data Timeliness:** The HMIS support staff will measure timeliness by running custom reports designed by the HMIS staff. Programs of different types will be reviewed separately. The agency will be required to improve their data timeliness or provide an explanation before the next month's report.
- **Data Completeness:** The HMIS support staff will measure completeness by running APRs, Universal Data Quality, or custom reports, and compare any missing rates to the data completeness benchmarks. The agency will be required to improve their data completeness rate or provide an explanation before the next month's report.
- **Data Accuracy:** The HMIS support staff will review source documentation during the annual site visits. The agency staff is responsible to make this documentation available upon request. Outreach projects may be exempt from the data accuracy review.

5.3. Monitoring Frequency

- Quarterly Review: Data Timeliness and Data Completeness
- Annual Review – site visits: Data Accuracy
- Other: Data quality monitoring may be performed outside of the regularly scheduled reviews, as needed or if requested by project funders or other interested parties (the agency itself, HMIS Lead Agency, CoC, HUD, or other Federal and local government agencies)

5.4. Compliance

- **Data Timeliness:** The average timeliness rate in any given quarter should be within the allowed timeframe.

- **Data Completeness:** There should be no missing (null) data for required data elements. Responses that fall under unknown (don't know or refused) should not exceed the allowed percentages in any given quarter. Housing providers should stay within the allowed utilization rates.
- **Data Accuracy:** The percentage of client files with inaccurate HMIS data should not exceed 10%. (For example, if the sampling includes 10 client files, then 9 out of 10 of these files must have the entire set of corresponding data entered correctly in HMIS.)

6. Incentives

The purpose of incentives is to provide positive re-enforcement to Philadelphia CoC service providers who achieve and maintain the level of data quality outlined in this HMIS Data Quality Plan.

6.1. Incentives Standard

Projects with the best performance with regards to the Data Quality Standards will be recognized by the CoC Advisory Committee.

Projects that receive CoC Program funding will submit data quality statistics in their annual renewal application to the OHS. One of the criteria on which the project's renewal application will be scored will be the project's achievement of the Data Quality Standards.

Projects are encouraged to develop their own internal incentives.

Data Collection Requirements

The goal of the CoC is to have 85% or more of HMIS participation rate. Meaning, we want to have more than 85% of all homeless service agencies within the CoC, utilizing the single HMIS system that the CoC contracted. Each housing project participating in HMIS is encouraged and expected to have an average of 90% or more of daily bed utilization rate. The CoC recognizes that there may be instances when complete client data may not be collected, but every participating agencies are expected to have no more than 10% error rate. The error rate includes, but not limited to the number of invalid data, "Don't Know", "Refused" ...etc. entries in HMIS.

Universal Data Elements (UDE) Collection Summary

Applicable Projects: All HMIS Participating Projects, regardless of funding source, including but not limited to:

- Emergency, Transitional, and Permanent Supportive Housing
- Homelessness Prevention
- Rapid Re-Housing
- OHS Centralized Intake Sites
- After Hours Processing Sites
- Emergency Assistance and Response Unit

Universal Data Elements (UDE)

Data Element		Collected For			Collection Point			
		All	HoH	Adults	Record Creation	Project Start	Update	Project Exit
3.1	Name	X			X			
3.2	Social Security Number	X			X			
3.3	Date of Birth	X			X			
3.4	Race	X			X			
3.5	Ethnicity	X			X			
3.6	Gender	X			X			
3.7	Veteran Status			X	X			
3.8	Disabling Condition	X				X		
3.10	Project Start Date	X				X		
3.11	Project Exit Date	X						X
3.12	Destination	X						X
3.15	Relationship to Head of Household	X				X		
3.16	Client Location		X			X	X	
3.20	Housing Move-in Date		X		X**			
3.917	Living Situation		X	X		X		

These are the minimum data collection standards as established by federal partners. OHS-contractual requirements supersede these baseline standards, if applicable.

**** Applicable to all Permanent Housing Components ONLY**

Program Specific Data Elements (PSDE)

The following common PSDEs are required for Homeless Prevention, Emergency Housing (EH), Transitional Housing (TH), Rapid Re-Housing (RRH), and Permanent Supportive Housing (PSH) projects receiving funding from the following sources:

- City of Philadelphia OHS
- HUD Continuum of Care Program (CoC)
- HUD Emergency Solutions Grants Program (ESG)
- HUD-Veterans Affairs Supportive Housing Program (HUD/VASH)

Program Specific Data Elements (PSDE)

Data Element		Collected For			Collection Point				
		All	HoH	Adults	Project Start	Occurrence Point	Update as Info Changes	Annual Assessment	Project Exit
4.2	Income and Sources		X	X	X		X	X	X
4.3	Non-Cash Benefits		X	X	X		X	X	X
4.4	Health Insurance	X			X		X	X	X
4.5	Physical Disability	X			X		X		X
4.6	Developmental Disability	X			X		X		X
4.7	Chronic Health Condition	X			X		X		X
4.8	HIV/AIDS	X			X		X		X
4.9	Mental Health Problem	X			X		X		X
4.10	Substance Abuse	X			X		X		X
4.11	Domestic Violence		X	X	X		X		
4.12	Contact		X			X			
4.13	Date of Engagement		X	X		X			
4.14	Bed-Night Date	X				X			
4.18	Housing Assessment Disposition		X						X

These are the minimum data collection standards as established by federal partners. OHS-contractual requirements supersede these baseline standards, if applicable.

Please refer to the 2014 HMIS Data Standards (including succeeding revisions) for information on required PSDEs for projects receiving funding from the following sources:

- HUD Housing Opportunities for Persons with AIDS Program (HOPWA)
- HHS Runaway and Homeless Youth Program (RHY)
- HHS Projects for Assistance in Transition from Homelessness (PATH)
- VA Supportive Services for Veteran Families Program (SSVF)

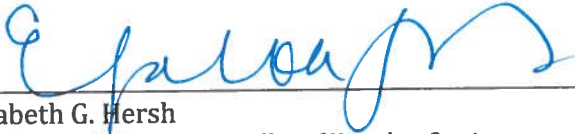
Duration

This plan must be reviewed annually and updated as needed by the Philadelphia Continuum of Care.

Update Log

Created: August 8, 2011

Reviewed and Reapproved: March 18, 2015
August 29, 2016
September 11, 2017



Elizabeth G. Hersh
Director, City of Philadelphia Office of Homeless Services

9/11/17
Date



John Ducoff
Chairperson, Philadelphia Continuum of Care Board

9/11/17
Date