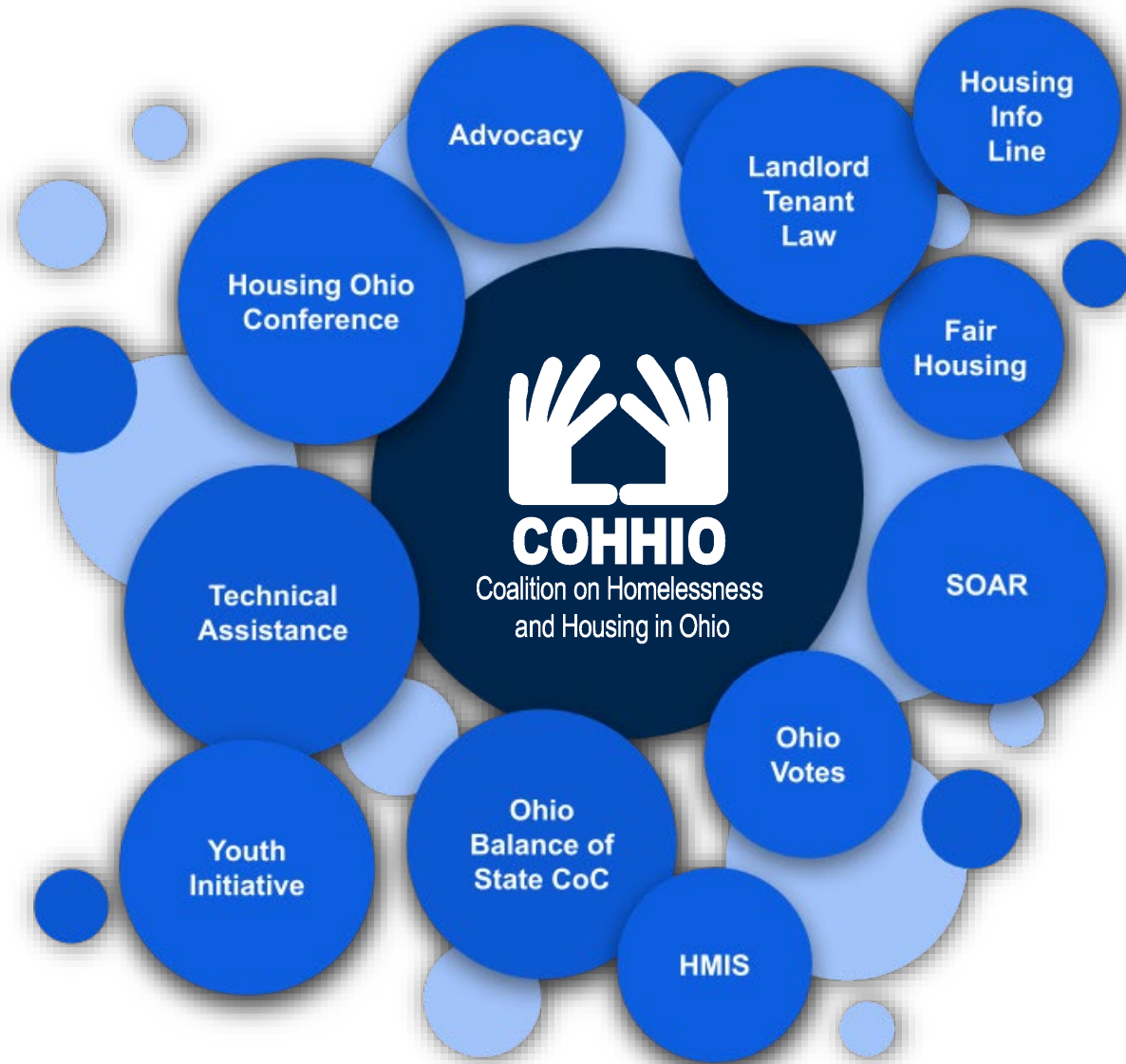
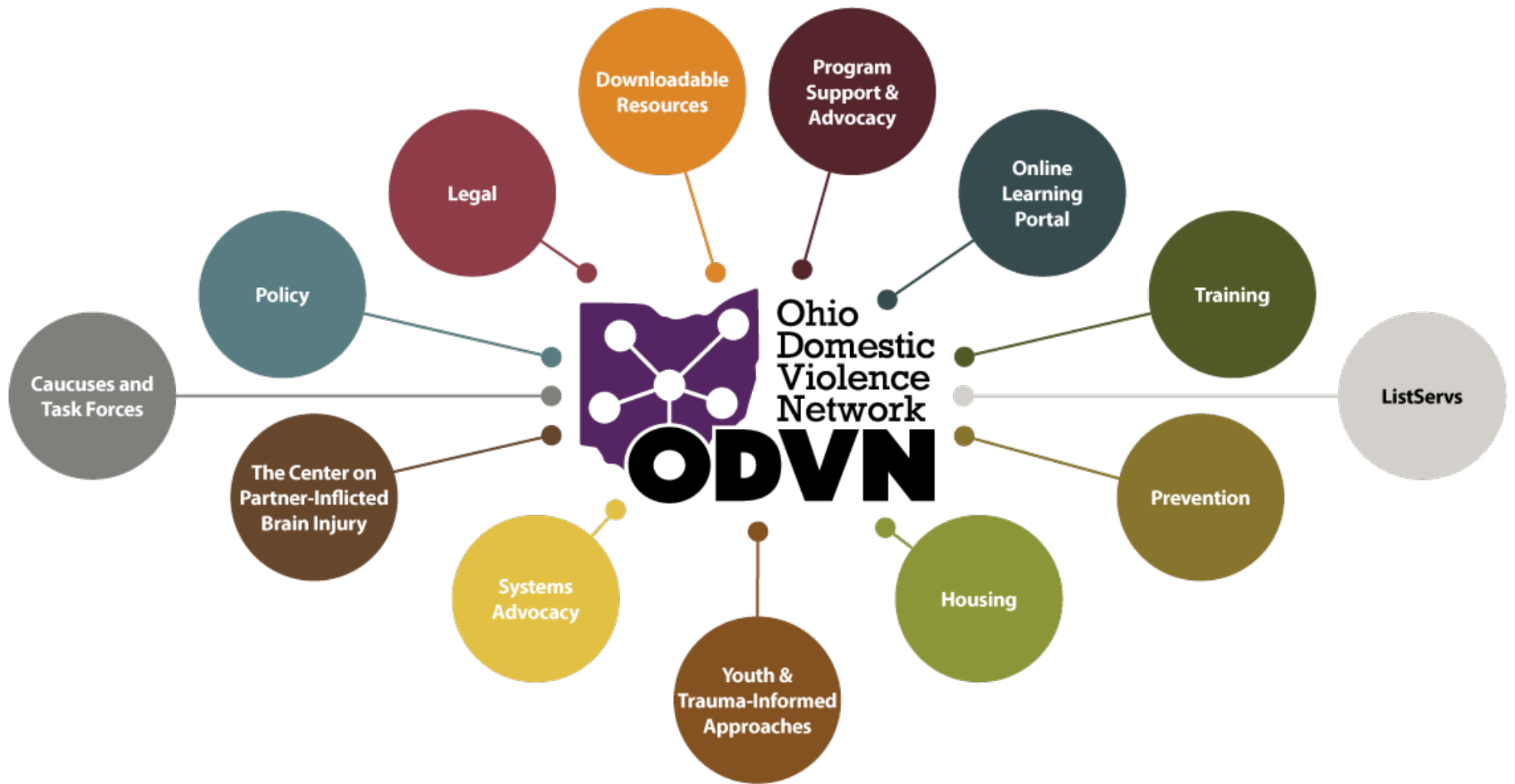


# Domestic Violence and HMIS: Prioritizing Safety

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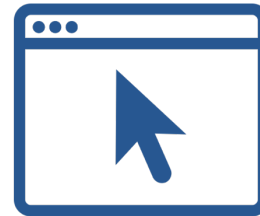
# Webinar Information



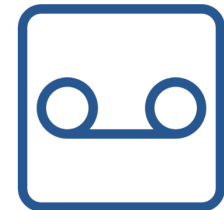
All participants lines are muted.



Use the chat feature in Zoom to submit questions.



This webinar will be posted to COHHIO's website.



This webinar is being recorded.

# Who is this webinar for?

- Homeless services staff
- Domestic violence advocates
- HMIS administrators

# Agenda

- Review of the Domestic Violence Data Collection Protocols
- Introduction of the sample assessment tool

# Background

In 2018 COHHIO reached out to ODVN and HMIS System Administrators to form a workgroup focused on coordinating services for clients between the victim service provider (VSP) and homeless services systems.

# Products

Over the course of the past three years, this workgroup has developed two products:

- [Domestic Violence Data Collection Protocols](#)
- [DV Assessment Tool](#)



# How did we get here?

Housing and Urban Development (HUD) requires all Continuum of Care (CoC) and Emergency Solutions Grant (ESG) recipients to enter data into a Homeless Management Information System (HMIS).

# What's HMIS?

A locally administered data system used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness (HMIS Data Standards).

# How did we get here?

- The Office on Violence against Women (OVW), the Family Violence Prevention and Services Act (FVPSA) and the Office for Victims of Crime (OVC) discourage the collection of client level data because of the unique risks to survivors of domestic violence.
- Programs funded by those streams are statutorily prohibited from entering data into HMIS.

# What's a comparable database?

- HUD funds some VSPs who are also receiving survivor specific funding. HUD requires those VSPs to enter data into a comparable database.
- A comparable database must be a relational database that meets all HMIS data standards and the minimum standards of HMIS privacy and security requirements (HMIS Comparable Database Decision Tree).

# How did we get here?

- Once a client leaves a VSP and enters a HUD-funded project, they are no longer protected by the HMIS prohibition.
- Because of this, some VSPs have been reluctant to refer their clients to HUD funded housing because of the data collection requirements.
- The protocols are designed to help secure survivor data when it is going in to HMIS.

# Informed Consent

- Informed consent refers to a client's agreement to receive services based on a complete understanding of the potential benefits and risks associated with those services.
- Because of the experience of trauma, it is particularly critical that housing workers take the time to make sure that each survivor understands what data is being collected about them and how it will be used.

# Coordinated Entry

- Coordinated Entry refers to the process by which clients access the homeless services system.
- It is important that survivor data not be shared without their informed consent.
- Survivors should be clearly notified that their refusal to provide or share data will not negatively impact their ability to access housing services.

# Coordinated Entry

- The right to refuse data includes prioritization assessments.
- If a client is declining the use of the local prioritization assessment, the VSP needs to provide some basic information to the local prioritization process to ensure the client has access to services.



# Why is it so important to protect victim information?

- Safety and confidentiality for victims is priority
- Avoid re-victimizing

# DV Assessment Tool

- The DV Assessment Tool was developed by the workgroup to be used by VSPs in situations where the client has refused the local prioritization assessment or the VSP has declined to use the local prioritization tool in accordance with their CoC's policies.

# DV Assessment Tool

- This tool was designed to provide the minimum amount of information necessary about a client to link them to the appropriate housing referral.

# DV Assessment Tool

- Personal ID (an assigned number to assist in communications)
- Number of Bedrooms Needed
- Housing Status
- Disabling Condition
- Length of Time Homeless
- Total Monthly Income
- Experience of DV
- Health Status
- Experience of Racial Discrimination
- Experience of Other Forms of Discrimination

# Informed Consent

- **Privacy Posting:** HUD requires that a privacy posting be visible in any area where data is collected for HMIS.
- **Acknowledgement of Data Collection:** HUD allows for this acknowledgement to be inferred by the presence of the privacy posting, so be aware of what the policy is in your CoC.
- **Consent to Share:** To share a client's data with other providers time-limited consent should be obtained from the client.

# Allowable Uses and Disclosures

The 2004 HMIS Rule outlines several allowable uses and disclosures of PII including:

- To provide or coordinate services
- For functions related to payment for services
- To carry out administration functions
- For creating de-identified PII

# Consent Protocols

- Written consent forms should be double locked or uploaded to a computer and locked
- Specific data to be collected and agencies who have access to it should be available in writing
- Each CoC has to determine the use of anonymous workflows, record locking, or both in HMIS

# Interviewing

- Interview adults separately
- Interview clients in as private an area as possible
- Train staff on trauma-informed interviewing
- Conduct safety planning and threat assessment



# Focus on DV Housing First



# Data Storage

- No VSP should ever store data in HMIS
- Paper forms should be double locked and/or shredded after use
- Electronic documents should be password protected on a password protected machine
- Have a VSP agency policy on data storage

# Data Transfer

- No PII should ever be transmitted electronically
- Name and contact information should only be shared in-person, over the phone or by a non-electronic fax

# What is PII?

Personally Identifying Information (PII) means individually identifying 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, **regardless of whether the information is encoded, encrypted, hashed or otherwise protected...**

# What is PII?

...including a first and last name; a home or other physical address; contact information (including a postal, email or Internet protocol address, or telephone or facsimile number); a social security number, driver license number, passport number, or student identification number; and any other information, including date of birth, racial or ethnic background, or religious affiliation, that would serve to identify any individual (VAWA).

# Questions

<https://cohhio.org/boscoc/special-initiatives/>

For more information:

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