

Guidance on HPRP Subgrantee Data Collection and Reporting for Victim Service Providers

The American Recovery and Reinvestment Act of 2009 (ARRA) states that grantees receiving Homelessness Prevention and Rapid Re-Housing Program¹ (HPRP) grants “shall collect data on the use of funds awarded and persons served with this assistance in HUD’s Homeless Management Information System (HMIS) or other comparable database.” (ARRA, p. 107) HPRP subgrantees (including organizations providing HPRP assistance under contract with a subgrantee) must also meet this requirement.

HUD has determined that ***HPRP subgrantees that are victim service providers as defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA) should NOT enter data directly in HMIS and must use a “comparable database.”*** VAWA defines a victim service provider as a nonprofit or nongovernmental organization including rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

Minimal Standards for a “Comparable Database”

Victim service providers that receive HPRP funding must submit unduplicated aggregate reports about the individuals and families served with HPRP funds to the HPRP grantee² on a quarterly basis or, if required by the grantee, on a more frequent basis. HPRP-funded providers must also have a mechanism to track the length of assistance provided to program beneficiaries to ensure that participants are recertified every 3 months if receiving medium-term rental assistance and that participants do not receive more than 18 months of HPRP assistance. Therefore, a victim service provider’s comparable database must collect client-level data over time and generate unduplicated aggregate reports based on that data. It cannot be a database that only records aggregate information.

The comparable database must comply with all current HUD HMIS Data and Technical standards. As of June 2009, current applicable HMIS Data and Technical Standards include Section 1 (Introduction), Section 4 (privacy and security standards), and Section 5 (technical standards) from the [2004 HMIS Data and Technical Standards Final Notice](#) (69 FR 146, July 30, 2004) and Section 2 (program descriptor data elements), Section 3 (universal data elements) and Section 4 (program-specific data elements) of the [2009 HMIS Data Standards](#). The HMIS standards also require organizations to comply with any federal, state, and local laws that require additional confidentiality protections, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (45 CFR Parts 160 and 164), the Confidentiality of Alcohol and Drug Abuse Patient Records Rule (42 C.F.R. Part 2), and VAWA.

¹ This program is referred as the Homelessness Prevention Fund in the ARRA, but has subsequently been renamed the Homelessness Prevention and Rapid Re-housing Program.

² Or subgrantee, if providing services under contract with an HPRP subgrantee.

Minimum Data Collection Requirements for Victim Service Providers

Victim service providers are required to collect and record all data elements that are required for HPRP funded providers on all clients served with HPRP funds in a comparable database. The client-level data collection requirements for HPRP programs are specified in the 2009 Data Standards Notice. They include:

- all *universal data elements*, and
- a subset of the *program-specific data elements*.

In addition, all of the *program descriptor data elements* must be recorded about each HPRP program in the HMIS (either by the HPRP-funded provider or by the HMIS system administrator) and the fields needed to correctly generate the HPRP performance reports are required to be collected in the comparable database. A mailing address (e.g. P.O. Box) or administrative office address are acceptable in lieu of a shelter's physical address. The program descriptor data elements only need to be entered once for each program and are not repeated for each client; however, each HPRP client record will need to include the appropriate Program Identifier in order to correctly generate required reports.

The required data elements are summarized in the 2009 Data Standards, Exhibits 1-1, 1-2 and 1-3.

Suppression of Potentially Identifying Data in HPRP Annual Performance Report (APR)

Victim service providers may suppress aggregate data on specific client characteristics in the HPRP APR when the following two conditions are met:

1. the aggregate number of persons reported for a particular reporting field is less than either one percent of the total number of clients or five persons, whichever is greater, and
2. provider staff reasonably believe that the inclusion of such information may constitute a threat to a client by allowing a victim's stalker or abuser to identify the location of a client with an uncommon demographic profile.

For example, a victim service provider that serves only one Asian client in a jurisdiction with a small Asian subpopulation may report that client as having an unknown or unreported race.