AB 977 Frequently Asked Questions for HMIS Leads

Table of Contents

Introduction

This document is intended for Homeless Management Information System (HMIS) Leads involved in the process of project setup and data entry into HMIS per AB 977 and Welfare and Institutions Code section 8256. This document is provided in addition to, not in replacement of, each state department's project setup instructions document, which can be found on the following websites:[1]

- Project Setup Instructions for HMIS Leads
- CDSS Grantee Project Setup Instructions
- DHCS Grantee Project Setup Instructions
- HCD Grantee Project Setup Instructions
- HHAP/ERF/FHC Grantee Project Setup Instructions
    - Currently administered by HCD and formerly administered by Cal ICH

Questions are divided into six sections: general questions that apply to all programs, questions that apply to programs funded by the California Department of Social Services (CDSS), questions that apply to programs funded by the California Department of Housing and Community Development (HCD), questions that apply to programs funded by the California Community Colleges Chancellor's Office (CCCCO), and questions that apply to the California Department of Health Care Services (DHCS) Behavioral Health Bridge Housing (BHBH) program. At the end of this document is an appendix with a list of commonly used acronyms. Updates to this document will be disseminated via communication channels determined by Cal ICH.

For more information about any of the content in this document, or TA for AB 977, HMIS Leads can contact HDIS@bcsh.ca.gov.

Programs Specified in Statute[2]:
- CDSS Bringing Families Home (BFH)
- CDSS CalWORKs Housing Support Program (HSP)
- CDSS Housing and Disability Income Advocacy Program (HDAP)
- HCD Homekey
- HCD Homeless Housing, Assistance, and Prevention Program (HHAP) [Formerly Cal ICH]
- HCD Housing for a Healthy California Program (HHC)
- HCD No Place Like Home Program (NPLH)
- HCD Multifamily Housing Program (MHP), including the following subsidiary programs:
    - Supportive Housing Multifamily Housing Program (SHMHP)

---

[1] For CCCCO or CalVet Project Setup Instructions, please email HDIS@bcsh.ca.gov.

[2] These ten programs were specified in Welfare and Institutions Code section 8256 as required to comply with AB 977 regardless of when the program commenced. Programs listed under State Funded Homelessness Programs that Commenced on or After July 1, 2021 have been determined by the departments to need to comply with AB 977 per WIC section 8256(3)(A).

- o Homeless Youth Multifamily Housing Program (HYMHP)
- HCD Veterans Housing and Homeless Prevention Act (VHHP)
- CCCCO Community Colleges Homeless and Housing Insecure Pilot Program (HHIP)

State Funded Homelessness Programs that Commenced on or after July 1, 2021:
- CalVet Veterans Support to Self-Reliance (VSSR) Pilot Program
- DHCS Behavioral Health Bridge Housing (BHBH) Program
- HCD Encampment Resolution Funding (ERF) Program [Formerly Cal ICH]
- HCD Family Homelessness Challenge (FHC) Grants [Formerly Cal ICH]

Additional Program Required to Enter Data into HMIS:
- CDSS Home Safe[3]

---

[3] CDSS's Home Safe program is not currently required to enter data under AB 977. However, per the All County Welfare Director's Letter Dated October 15, 2021, CDSS does require Home Safe grantees to enter data into HMIS. CDSS encourages Home Safe grantees to set up their HMIS projects in accordance with the AB 977 Project Setup Instructions and participate in TA and training activities.

Questions That Apply to All Programs

Questions About Which Programs and Grantees Need to Comply With AB 977

1. **Which grantees and subgrantees must comply with AB 977?**
   [Welfare and Institutions Code section 8256 (d)](#) mandates that beginning January 1, 2023, grantees and entities operating the [state homelessness program specified in statute](#), as well as [state homelessness programs that commenced on or after July 1, 2021](#), as a condition of receiving state funds, must enter Universal Data Elements (Items 3.01–3.917) and Common Data Elements (Items 4.02–4.20 and Item W5 of the Individual Federal Partner Program Elements), as defined by the United States Department of Housing and Urban Development [FY 2024 HMIS Data Standards Manual](#), on the individuals and families it serves into its local HMIS, unless otherwise exempted by state or federal law. Grantees or entities that elect to subcontract services are responsible for ensuring subgrantees comply with identified data reporting requirements as a recipient of state funding.

2. **When do development projects that are not yet serving clients need to have projects set up in HMIS?**
   Cal ICH recommends setting up projects in HMIS 90 days before initial occupancy. This ensures you'll be ready to enter data on the first day you serve clients, as required by AB 977.

3. **What is the process for CoCs submitting data into California's Homeless Data Integration System (HDIS)?**
   The 44 separate CoCs send their data to the HDIS via a secure file transfer system. HMIS Leads upload HMIS data into Cal ICH's HDIS on a quarterly basis. Grantees do not enter data directly into HDIS. For more information on how to contact the local HMIS Lead, please email the Cal ICH TA team at HDIS@bcsh.ca.gov.

4. **Do the requirements of AB 977 apply to tribal grantees?**
   In accordance with Cal ICH AB 977 guidance, the state is not requiring tribal recipients to enter data into HMIS at this time because tribes are considered sovereign entities and do not have their own local HMIS. However, technical assistance is available to those tribal recipients that want to enter data into HMIS.

5. **If a PSH project received one-time development funding from a state program listed under AB 977, but does not receive ongoing state operating funds, is it still required to be entered into HMIS?**
   Yes, any project that has received state funding from programs listed under AB 977, including one-time development funds, is subject to the law's HMIS data entry requirements. The nature of the funding—whether one-time or recurring—is not a

determining factor for HMIS participation. Therefore, even if the PSH building's only ongoing funding is through voucher subsidies, its receipt of state development funds mandates its inclusion in HMIS.

For example, a grantee received a grant through a state program to fund one-time capital costs for development of a PSH project, with an award date of September 1, 2023. That project continued to receive ongoing rental assistance funds through a non-state program. The state program's Other Funder Code and the grantee's assigned Grant ID would be entered into the PSH project in HMIS with a Grant Start Date of September 1, 2023 and a null Grant End Date.

HMIS Leads should continue to follow guidance on avoiding overlapping enrollments. If a PSH project already exists in the HMIS for the project that received the one-time development funds, HMIS Leads can add the AB 977 Other Funder Code of the development program to the existing project. For more information on project setup to avoid overlapping enrollments, refer to Question 19.

Questions About Project Setup and Ongoing Client-Level Data Entry

6. **What are grantees' responsibilities regarding the updated data elements and response options when HUD releases new HMIS Data Standards?**

   When HUD releases new Data Standards, HUD will provide HMIS Leads and vendors with instructions to map most data entered prior to the new data standards to new response options wherever possible. HMIS Leads should communicate to their HMIS end-users, including grantees of California state programs, if there are data entry requirements for data elements that are not mapped to the new data standards. In some cases, grantees and/or HMIS Leads may need to enter data for new fields. Updated HMIS Project Setup Instructions that include updates related to the HMIS Data Standards will be made available to all grantees and recipients of programs subject to AB 977. Grantees who have questions about how to update data in their HMIS will be directed to contact their HMIS Lead for assistance.

   In all cases, grantees will be encouraged to review the updated client and project data after the new HMIS Data Standards go into effect to ensure the data accurately reflects their projects and clients.

7. **Does Cal ICH have a protocol for naming projects?**

   No, Cal ICH will not be providing a protocol for naming projects. Cal ICH and administering state departments will be using funding code fields (Other Funder Code text and Grant ID) to identify projects.

From the FY 2024 HMIS Data Standards Manual: While the project name is not required to match grant agreements, the project name should be consistent with the name used across reports (e.g., Annual Performance Report and Housing Inventory Count).

8. **Which AB 977 projects should be set up using the continuum project field in HMIS?**
    Continuum Projects are defined in the HUD FY 2024 HMIS Data Standards Manual as follows: "A project within the geographic boundaries of the Continuum(s) of Care (CoC) associated with the HMIS whose primary purpose is to meet the specific needs of people who are experiencing homelessness or at risk of homelessness, by providing lodging and/or services. A continuum project is not limited to those projects funded by HUD and should include all of the federal partner projects and all other federally or non-federally funded projects functioning within the CoC."

    Projects that are limited to serving individuals experiencing homelessness should be marked as Continuum. See this question for more information on projects that serve clients who are at-risk of homelessness. For more information, please email Cal ICH at HDIS@bcsh.ca.gov.

9. **How should HMIS Leads set up projects for grantees when projects provide a broad range of activities?**
    Grantees should create an HMIS project for each project type separately as defined by HUD guidance. Cal ICH issued program-specific guidance on the project type field as part of the project setup instructions released by each administering state department or agency. Note this is **not** an exhaustive list of possible project types for each program. Grantees and HMIS Lead should work together to identify appropriate project types that align best with their project's activities.

10. **Can a project funded by an AB 977 applicable grant be set up differently than the recommended state guidance in the Project Setup Instructions for HMIS Leads document?**
    Projects should be set up in accordance with the HMIS project type that most closely aligns with the project activities. The guidance in the Project Setup Instructions for HMIS Leads document is intended to assist HMIS Leads and grantees with determining the appropriate project type(s) and does not reflect an exhaustive list of project types and activities. In some cases, individual grantees may use their funding for eligible program activities that align with other project types than those listed.

    HMIS Leads can work with Cal ICH to identify the project type appropriate to grantees' specific circumstances. For more information, please email Cal ICH at HDIS@bcsh.ca.gov. Grantees with questions about whether their project conforms with

the eligible uses of their funding program should consult with the appropriate state department.

11. What are the requirements for a project to have the project type of permanent supportive housing (PSH)?

There are several types of permanent housing categories within HMIS. The following answer serves as general guidance, but HMIS Leads should work with grantees to identify the appropriate project type.

PSH - Permanent Supportive Housing (disability required for entry): A project that offers *permanent housing and supportive services* to assist people experiencing homelessness *with a disability* (individuals with disabilities or families in which one adult or child has a disability) to live independently. For purposes of HMIS project set-up, a project does not have to be targeted to people who are chronically homeless to be considered PSH; however, many CoCs have prioritized PSH in that way.

In contrast, a project that offers permanent housing (PH) to assist persons experiencing homelessness without a disability requirement would be set up as a different project type under Permanent Housing, depending on the length of assistance and whether or not services are also provided to clients.

Rapid Rehousing: housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and achieve stability in that housing. Beginning with the FY 2024 Data Standards, Rapid Rehousing projects select one of two RRH subtypes:

- **RRH**: **Housing with or without services**: A RRH project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants; or
- **RRH**: **Services Only**: A RRH project that provides services only and does not provide ongoing rental assistance or support any inventory for participants.

Permanent Housing with Services: permanent housing and supportive services but does not limit eligibility to individuals with disabilities or families in which one adult or child has a disability.

Permanent Housing – Housing Only: permanent housing without supportive services.

12. How should projects serving clients who are at risk of homelessness be set up in HMIS?

The only project type serving clients who are at risk of homelessness (i.e., where homelessness is not an eligibility requirement) that should be set up as a continuum project is Homelessness Prevention (HP).

Homelessness Prevention is defined as follows: A project that offers services and/or financial assistance necessary to prevent a person from moving into an emergency shelter or place not meant for human habitation.

Other project types (e.g., Permanent Housing Only, Permanent Housing with Services, Other) serving clients who are at risk of homelessness should be designated as non-continuum projects. Non-continuum projects should still be set up with the project type that best reflects their service model.

13. **If grantees have one funding source that is used to provide funding for multiple types of projects, do two projects need to be set up with different project types?**
Yes. If grantees are using the same program funding for multiple types of projects, for example, emergency shelter (e.g., motel stay) and permanent housing, they would need to be set up as two separate projects with two different project types.

14. **Should a separate project be set up in HMIS for each subgrantee or contracted provider of a program?**
Grantees are responsible for ensuring compliance for their subgrantees and contracted providers. Cal ICH recommends that grantees that are creating new projects in HMIS create separate projects in HMIS for each subgrantee. For example, if there are two subgrantees or contracted providers that both offer Rapid Rehousing (RRH) with HHAP funding, the projects in HMIS would be: (1) Provider 1: RRH-HHAP, and (2) Provider 2: RRH-HHAP. This will allow grantees to monitor AB 977 compliance for each organization operating their program. Please see the relevant agency Project Setup Instructions for additional information. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

15. **If a grantee needs to set up new projects to align with updated project setup guidance, do they need to transfer existing client records into the new projects or only enter client data for enrollments that occur after the new projects were set up?**
Any active client (new or existing) is required to be entered into the "new" project at the time the new project is set up for the purposes of AB 977 compliance.

Grantees and HMIS Leads should work together to ensure that client records are handled in a way that will minimize impact on reporting. Generally, the preferred approach is for the HMIS Lead to facilitate a complete transfer of the client record from the "old" project to the "new" project.

Historical records for clients that have already been exited from the old project at the time of the new project setup date would not need to be transferred to the new project, unless the organization wants complete historical records for reporting purposes. When feasible and appropriate based on program and project start date,

Cal ICH encourages grantees to migrate data back to the deadline for HMIS data entry for that state program or whenever the grantees first began serving clients.

16. **How should data be entered for clients who are served by both Emergency Shelter (ES) and Rapid Rehousing (RRH) projects?**

    For clients who are provided with Emergency Shelter (ES) at the same time as enrolling in a Rapid Rehousing (RRH) project, they would enroll (receive a project start date) in HMIS to both the ES and RRH concurrently. Once the client moves into housing with the assistance of RRH, they would be *exited* from the ES project. In the RRH project, the client would receive a "Housing Move-in Date" on the date they move into permanent housing. The client would remain enrolled in the RRH project as long as they are receiving rental assistance and/or services, including case management, from the RRH project. The client is considered permanently housed after their "Housing Move-in Date." This remains true even if there is only one funding source for the two different project types.

17. **If an HMIS Lead splits an existing HMIS project to separate clients receiving an AB 977 funded service from those who are not, are there specific requirements grantees must follow for transferring client data from the existing project to the new project?**

    Specific requirements for transferring or migrating client data in HMIS from one project to another differ by HMIS software and other local requirements. HMIS Leads and grantees should consult their vendor and [HUD's Grant Consolidation and Closing Projects](#) guide for different options for moving client data from one project to another. Client enrollment dates (project start date, exit date, and housing move-in date) and the project's operating start date should align with the guidance in the HMIS Data Standards Manual for these data elements. HMIS Leads and grantees should work together to ensure correct project set ups.

18. **How should data be entered for clients who are served by both Homelessness Prevention (HP) and either permanent housing or shelter/temporary housing projects?**

    Clients should not be enrolled in a Homelessness Prevention (HP) project at the same time as a permanent housing or shelter/temporary housing project. HP projects are meant to serve clients at risk of experiencing homelessness, while permanent housing and shelter/temporary housing projects are meant to serve people experiencing homelessness. If clients lose their permanent housing, clients should be exited from HP projects. If clients are then enrolled in permanent housing and/or shelter/temporary housing projects that receive AB 977 funding, or other funding that requires HMIS data entry, the clients would be enrolled in the appropriate HMIS project with a start date that matches the first date they received housing or services.

California
Interagency Council
on Homelessness

CAL ICH

BCSH
CALIFORNIA BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

19. **Can a client be enrolled in two different HMIS projects at the same time?**
It depends on the project type(s) of the projects in which the client is enrolled. Dual enrollments that include one or more non-residential projects are typically not an issue. In some cases, enrollments in two different residential projects at the same time may cause reporting issues for the CoC. This is a particular issue when it appears that clients are active and residing in more than one shelter or transitional housing project, or in more than one permanent housing project with Housing Move-In Dates at the same time, and the bed inventory is duplicated.

HMIS Leads should consider different options for avoiding dual enrollments:
- Splitting up clients into two or more different projects if the funder(s) require separate reporting on the clients served by their program, or
- Setting up one or both of the projects up as a Services Only or RRH: Services Only, if appropriate for the services funded by the program, which would avoid overlapping enrollment issues with other permanent housing projects.

Some reporting issues can be explained via the note sections of federal reports. HMIS Leads should refer to guidance for those specific reports. Please continue to reference HUD guidance ([HMIS Dual Enrollment and HIC Duplicate Inventory Training Resource](#)) for information around this topic.

20. **Do grantees receive verification or reports to ensure projects are properly set up in HMIS?**
Grantees will not receive verification from Cal ICH when projects are set up in HMIS. State departments will monitor compliance through the State Department Compliance and Data Quality Dashboard from California's [Homeless Data Integration System (HDIS)](#). After HMIS Leads upload quarterly data to HDIS and it has been fully processed, the state departments will communicate with grantees to address compliance and data quality issues.

21. **What should the project's Operating Start Date be if a grantee was using funding before the project was set up in HMIS?**
The project's Operating Start Date in HMIS should reflect the actual date the project began serving clients, even if that date precedes the date on which the project was created in HMIS.

Questions About Funding, Other Funder Codes, and Grant IDs

22. **What should AB 977 grantees enter into the Other Funder Code text box and Grant Identifier fields in HMIS?**
Information on what to enter in the Other Funder text box and the Grant Identifier fields in HMIS is provided in the *Funding Sources* section and *Table 3* in the HMIS Project Setup

Instructions for Grantees and the Project Setup Instructions for HMIS Leads. Links to the most up-to-date version of these documents can be found in this document's Introduction section.

23. **What should the grant start date be if the grantee has already been using the program's funds for the project prior to setting up the project in HMIS?**

The grant start date in HMIS should reflect the actual date the project first received that program funding, such as execution of a contract, release of a County Fiscal Letter, or other means of formal receipt of funding.

California
Interagency Council
on Homelessness
CAL ICH

BCSH
CALIFORNIA BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

Questions That Apply to California Department of Social Services (CDSS)

Questions About Which Programs and Grantees Need to Comply with AB 977

24. **Do CDSS projects need to be set up in HMIS if they do not have any beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness?**

    No, only projects with beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness need to be set up in HMIS. If a project receives funding from a program included in AB 977, but does not meet these criteria, the grantee should email the Cal ICH TA team at HDIS@bcsh.ca.gov to determine if HMIS is required and so Cal ICH can update their records.

Questions About Project Setup and Ongoing Client-Level Data Entry

25. **What are the rules around the HMIS data entry requirements for Bringing Families Home (BFH) families and AB 977, specifically around HIV/AIDS status.**

    There is no universal rule about HIV data collection. The CoC's privacy notice dictates what can and cannot be collected/used in the local HMIS. To address grantee concerns about sharing client data with other HMIS participating organizations in the CoC, please refer to this section of questions regarding HIPAA and setting up "closed" or "private" projects in HMIS.

26. **For Bringing Families Home (BFH) projects, should grantees enter children into HMIS who are not residing with the biological parent in the BFH project (e.g., the family is engaged in family reunification and the child is in out-of-home care)?**

    The following is based on HUD's guidance on household enrollments and project start dates in the FY 2024 HMIS Data Standards Manual:

    For residential projects, household enrollments should only include family members who are currently living with the household in the project unit. Project start dates for each family member should reflect the actual dates they are staying in the project. Generally, children that are not currently living with the family should not be enrolled with a project start date if and until they are reunited with the family. Note that project start dates are used to calculate the length of time people experience homelessness, so enrolling a child while they are placed with a foster family or in care elsewhere would count that time as time the child was experiencing homelessness.

    For non-residential projects (Street Outreach, Services Only) or enrollments in residential projects before being housed (Rapid Re-Housing project before move-in date), enrollments should only include family members who would be living with the household if they were housed or in shelter. Generally, children placed with a foster family or in

care elsewhere would not be included in this consideration. Please reach out to the HDIS@bcsh.ca.gov inbox with any nuanced situations related to this guidance.

Relationship to Head of Household: A household is a single individual or a group of persons who apply together to a continuum project for assistance and who live together in one dwelling unit, or, for persons who are not housed, who would live together in one dwelling unit if they were housed.

Project Start Date: Data Collection Instruction: Record the month, day, and year of each client's project start. The 'Project Start Date' indicates a client is now being assisted by the project. Each individual client in a household will have their own 'Project Start Date.' If a new client is added to a household after the original household members' start dates, the new client's start date should reflect the actual day that client started the project.

Questions About Funding, Other Funder Codes, and Grant IDs

27. **If a county is applying two rounds of the same CDSS funding source to a project, should these be added as two different funding sources?**

    Both rounds should be added as a single funding source. For all CDSS programs the funding code should be the program acronym (e.g., BFH) followed by the county code (which is the same across all CDSS programs). This information is also in the CDSS Project Setup Instructions document—a link to the most up-to-date version of this document can be found in the Introduction section of this document. This is the same for all years or rounds that the project received funding. For the grant start date, enter the start date of the project in HMIS or the first date of client enrollment in the CDSS-funded program's HMIS project. The grant end date should be left blank until the project no longer receives funding from the program.

Questions That Apply to California Department of Housing and Community Development (HCD) Programs

Questions About Which Programs and Grantees Need to Comply With AB 977

28. **Do HCD projects need to be set up in HMIS if they do not have any beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness?**

No, only projects with beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness need to be set up in HMIS. If a project receives funding from a program included in AB 977, but does not meet these criteria, the grantee should reach out to their administering state department. HMIS Leads can email the Cal ICH team at HDIS@bcsh.ca.gov for assistance in determining if HMIS is required.

29. **Are grantees required to enter data for projects that received state funding from one of the programs listed in AB 977 if the funding was first disbursed more than 10 years ago?**

Yes. As long as the project is still in operation, the project needs to be set up in HMIS. Data should be entered for active clients, as well as new clients after project set up. For older projects, there is lenience on the Common Data Elements (CDEs) that need to be entered for clients that enrolled in the project before it was set up in HMIS, but CDEs must be collected at project start for all clients who enter the project on or after July 1, 2023. All project information should be entered into HMIS as accurately as possible, i.e., grant and project start date being in the early 2000s.

Questions About Project Setup and Ongoing Client-Level Data Entry

30. **Will grantees receive notice from HCD about their AB 977 compliance after the quarterly data has been reviewed?**

Yes, HCD will notify grantees about AB 977 compliance after Cal ICH processes quarterly data and the State Department Compliance and Data Quality Dashboard is updated. Depending on the department's compliance monitoring schedule, grantees may not receive notice every quarter. Cal ICH will provide technical assistance to state departments to support compliance. Grantees may contact their HMIS lead to verify proper project setup and client data entry before quarterly submissions.

Questions About Funding, Other Funder Codes, and Grant IDs

31. **If a City, County, or CoC applied for HHAP through a joint application or there was a redirection of funds, which Grantee ID should be used?**
The Grant ID should use the Grantee ID and contract number for the jurisdiction applying on behalf of the joint applicants or the jurisdiction receiving the redirected funds.

32. **If a project receives funds that originate from two different HHAP grantees (e.g., a County and a CoC), which Grantee ID should be used?**
In HMIS, the project should have two different Grant IDs reflecting the Grantee IDs for each HHAP grantee and their respective contract numbers. Grantees should enter the HHAP funding code twice with the two different Grantee IDs.

33. **Can multiple rounds of HHAP funds be used for the same HMIS project or do two projects need to be set up, one for each funding source?**
Multiple funding sources can be connected to a single project – the grantee just needs to make sure that they enter other funder text and grant identifiers separately for each round.

Questions for ERF Grantees (ERF-2-R, ERF-3-L, and future rounds)

34. **What are the differences in project set up requirements between ERF-1/2-L and ERF-2-R/3-L?**

    As described in the [AB 977 HMIS Project Setup Instructions for HCD Grantees [HHAP, ERF, FHC]](#), starting with ERF-2-R, HMIS projects for ERF must be set up in a way that allows HCD to unequivocally identify in HDIS all the served clients from each of the designated encampment(s) served by ERF-funded client services/activities. ERF-2-R and later rounds must ensure that, for each encampment site, at least one HMIS project (or multiple projects when combined) used for ERF-funded services/activities is both (1) exclusive to only clients from the ERF-designated encampment (i.e., clients who are not from the designated encampment are not also included in that HMIS project) and (2) comprehensive of all the clients from the designated encampment who are served by ERF-funded client services/activities. ERF-1 and -2-L are not obligated to adopt this specific project setup, but grantees can choose to follow the same project setup for earlier rounds if they prefer.

35. **A grantee plans to use funds from ERF-2-R/3-L in conjunction with other funds to carry out their planned services at the encampment they designated in their ERF application. How should their ERF projects be set up in HMIS to account for these multiple funding streams?**

    Projects in HMIS can have more than one funding program. The HMIS projects will have multiple funder codes/grant IDs associated with them. For example, if a grantee is using both ERF-3-L and HUD's Emergency Solutions Grant (ESG) programs to fund a single street outreach service program at an encampment they designated in their ERF-3-L application, both ERF-3-L and ESG should be added as funding programs for the one Street Outreach project in HMIS. HMIS projects for activities funded by ERF-2-R, 3-L, and future rounds must meet the following criteria:

    1) **Exclusive** to only served clients that resided in the designated encampment (i.e., only clients from that encampment who got served by ERF-funded services are enrolled in the project),
    2) **Comprehensive** of all the clients from the designated encampment who got served by ERF-funded services, and
    3) **Specific to a single encampment** (i.e., projects are exclusive and comprehensive for a single encampment designated in the grantee's ERF funding application – not multiple designated encampments).

    If the other funding sources require the grantee to report into HMIS and are funding activities that serve clients from outside the encampment(s) designated in the grantee's ERF application, then the served clients from outside the encampment(s) must be enrolled in separate projects than the ones set up exclusively for clients from

the designated encampment(s). Grantees should confirm with their other funders what the HMIS reporting requirements are for their programs.

36. **If an ERF grantee provides services to multiple encampment sites within a larger project area, can the project area be treated as a single designated encampment when entering into HMIS or should all encampment sites be entered separately?**
Grantees should set up HMIS projects consistent with how the encampment(s) and their proposed interventions were described in their ERF-2-R or 3-L applications. For the purposes of HMIS project setup and ERF reporting, multiple sites that share the same needs, resources, and housing strategies can be considered a single encampment. If a grantee is serving an area that includes sites that have unique needs and are served by different strategies and interventions, those should be considered separate encampments and set up as separate HMIS projects.

37. **If a grantee is working with multiple encampments and therefore has multiple HMIS projects (one for each encampment) and a client moves from one encampment to another, how should that be addressed in HMIS?**
If a client moves from one encampment designated in the grantee's ERF funding application ("Encampment 1") to another designated encampment ("Encampment 2"), they should be exited from the Encampment 1 street outreach project (with a project exit date the day they moved out of Encampment 1) and then enrolled in the Encampment 2 street outreach project (with a project start date on the day they moved into Encampment 2). If they are later placed into another project type (e.g., Emergency Shelter, Permanent Supportive Housing, Services Only) from the second encampment, they should be enrolled in the project that was set up for clients from Encampment 2.

38. **The grantee is serving multiple encampment sites where many of the residents of each frequently move between the various sites. How should the clients be enrolled in HMIS given how frequently they would need to be exited from one project and (re-)enrolled into another?**
If residents move so frequently between the sites, then the grantee should consider if the sites are truly separate encampments with different needs that should be served by different strategies and interventions or if the various sites share the same needs, resources, and housing strategies in light of the fact that, on any given night, many of the same people could be residing at any of the sites. Depending on what the grantee wrote in their ERF funding application regarding the needs of the sites, the grantee could treat these various sites as just one single encampment during reporting.

39. **If an encampment site has clients that are being served by other projects, how should they be entered in HMIS?**

In some circumstances, clients in HMIS can be enrolled in more than one project (referred to as "dual enrollments") at the same time, depending on the types of projects involved. For example, clients can be dually enrolled in Services Only and residential project types because Services Only projects are not residential, and the client will not appear to be residing in two different units at the same time. Another example of allowable dual enrollments are clients simultaneously enrolled in Emergency Shelter and permanent housing projects *before* they receive a Housing Move-in Date in the permanent housing project.

Dual enrollments in situations where a client would be assumed to be residing in two different residential projects at the same time are considered physically impossible, e.g., a client cannot be simultaneously enrolled in both ES and TH projects simultaneously. If clients who receive ERF-funded services are enrolled in other projects in HMIS, HMIS Leads should work with grantees to ensure correct project setup to avoid impossible dual enrollments.

40. **ERF-2-R/3-L funding is being used for interim and permanent housing for clients from an encampment while other funding resources are being leveraged for street outreach services in the encampment. Does an ERF-exclusive Street Outreach project need to be set up in HMIS even though ERF-2-R/3-L is not funding street outreach services?**

No, an ERF-exclusive Street Outreach project does not need to be set up in HMIS if ERF is not funding street outreach services at the encampment. HMIS Leads and grantees should set up ERF-exclusive projects that align with the shelter, housing, and/or services being funded by the ERF program. Grantees should confirm with their other funders if they have HMIS requirements.

41. **Can clients from two different designated encampments be enrolled in one emergency shelter project in HMIS?**

No, each ERF-2-R or 3-L-funded Emergency Shelter must enroll clients from a single designated encampment. In other words, each Emergency Shelter project must be specific to a single encampment designated in the grantee's ERF funding application. For example, if ERF funds are being used for an Emergency Shelter for clients from Encampment 1 and Encampment 2, the grantee must set up two separate Emergency Shelter projects, as follows:
1) Encampment 1 Emergency Shelter
2) Encampment 2 Emergency Shelter

42. **The grantee is partnering with a separate jurisdiction to serve different areas of the one encampment designated in their ERF-2-R/3-L funding application. Can the grantee set up two separate projects in HMIS dedicated to specific areas in the encampment, or do they have to have one single project for this encampment?**

Grantees can set up separate projects in HMIS for one encampment as long as, taken together, all clients in the encampment are entered into those projects. For example, if a grantee contracts with two different service providers to provide outreach services to one encampment, they can set up two separate street outreach projects to track their clients separately as long as all served clients in the encampment are enrolled in one of the two projects. The same setup can be used by grantees that partner with other jurisdictions to serve the encampment.

1) Provider 1 – Street Outreach Project 1
2) Provider 2 – Street Outreach Project 2

43. **A client being served at an Emergency Shelter did not come directly from the ERF-designated encampment – they left the encampment to reside elsewhere and then subsequently got served at the Emergency Shelter. How should this client be enrolled in HMIS?**

Grantees using ERF-2-R/3-L funding for direct services that necessitate entering the clients' data into HMIS should screen the clients to determine if they resided in the encampment designated in their ERF funding application at any point after the ERF grant start date. For example, clients could be asked "Did you reside in [Encampment 1] on or after [grant start date]?". For clients that cannot answer that question, grantees can use the client's enrollment in prior ERF-2-R/3-L-funded HMIS projects as a method to determine if the client did indeed reside in the ERF-designated encampment during the grant lifetime. For clients that are determined to have resided in the ERF-designated encampment during the grant lifetime, they should be enrolled in Emergency Shelter HMIS project that corresponds with the encampment that they resided in most recently.

44. A grantee received funding from ERF-1 and/or 2-L to provide services to the same encampment that was designated in the ERF-2-R/3-L application. Can they simply use the existing HMIS projects that were set up for ERF-1 and/or 2-L or must they set up new projects for ERF-2-R/3-L?

The grantee can use the existing HMIS projects if those projects meet the standards for project setup for ERF-2-R/3-L (i.e., 1. exclusivity: the projects are exclusive to only clients from the designated encampment who got served by ERF-funded activities; 2. comprehensiveness: the projects are comprehensive of everyone from the encampment who got served by ERF-funded activities; and 3. site-specificness: the projects are specific to a single designated encampment). In the case that the existing projects already meet the exclusivity, comprehensiveness, and site-specificness requirements, the grantee would simply need to add the ERF-2-R/3-L Other Funder Code and Grant ID to the existing HMIS projects that the ERF-2-R/3-L grant is funding in order to become compliant with the reporting requirements for ERF-2-R/3-L. If the ERF-2-R/3-L money is funding additional or different activities than what ERF-1/2-L funded, then the grantee will need to set up new HMIS projects that properly meet the three setup requirements to encompass those new activities.

45. If clients are receiving ERF-funded street outreach services as well as services funded by another program, can they be enrolled in two different Street Outreach projects simultaneously?

Dual enrollments in non-residential projects, including Street Outreach, are allowable. With dual street outreach enrollments, grantees should ensure that data is entered consistently across both projects so that data does not conflict (e.g., if a client exits homelessness to a permanent housing destination, that should be reflected in the exit destination field for both Street Outreach project enrollments).

Questions That Apply to California Community Colleges Chancellor's Office (CCCCO) HHIP Program

Questions About Which Programs and Grantees Need to Comply With AB 977

46. **Do colleges need to enter all Community Colleges Homeless and Housing Insecure Pilot Program (HHIP) participants in HMIS?**

    Colleges should enter students into HMIS who receive HHIP-funded services when the project's primary purpose is to (1) meet the specific needs of people experiencing homelessness by providing lodging and/or services, and/or (2) serve clients at-risk of homelessness with homelessness prevention (services and/or financial assistance) to stabilize their housing.

47. **For colleges with services areas that include multiple counties, which CoC's HMIS should the HHIP student data be entered into?**

    The college and housing partners should work with each CoC that covers the counties in their service area.

Questions That Apply to California Department of Health Care Services (DHCS) Behavioral Health Bridge Housing (BHBH) Program

Questions About Project Setup and Ongoing Client-Level Data Entry

48. **Do grantees need to enter data into HMIS for BHBH clients that had been served prior to May 31, 2024?**

    Yes, grantees are required to enter clients who are actively enrolled in a project on May 31, 2024, or the date that the project is set up, even if they began receiving BHBH services prior to that date. Grantees are not required to enter clients who entered <u>and</u> exited a project before May 31, 2024 (or before the project was set up) and are no longer being served by the project. All project-level and client-level data should reflect the actual start dates if they differ from the date the project was set up in HMIS.

    Cal ICH recognizes that grantees may be unable to complete certain Common Data Elements (CDEs) for existing clients who entered the project prior to project setup. Please refer to Appendix B in the [AB 977 HMIS Project Setup Instructions](#) for more details on which CDEs are required to be collected and at which data collection stage.

49. **What project types are allowed under the BHBH funding source?**

    BHBH grantees should only use the following project types for BHBH funding: Emergency Shelter: Entry/Exit (ES:EE), Emergency Shelter: Night-by-Night (ES:NBN), Rapid Rehousing (RRH: Services Only or RRH: Housing with or without services), and Supportive Services Only: Services Only (SSO). Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information.

50. **What HMIS project type should be used for Auxiliary Funding in Assisted Living facilities?**

    Grantees should use the Supportive Services Only: Services Only (SSO) project type for auxiliary funding in assisted living settings. Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information.

51. **Should funding associated with substance use disorder (SUD) facilities be set up as Supportive Services Only: Services Only (SSO) projects?**

    Residential SUD treatment is not an allowable use of BHBH funds. Recovery Housing, or Sober Living Environments, can be set up as an Emergency Shelter project depending on how it is structured.

52. **Should all rental assistance programs be set up as Rapid Re-housing (RRH) projects? If a grantee uses BHBH funding to provide rental assistance to a client with their own lease, will this prevent the client from being prioritized for Permanent Supportive Housing (PSH)?**

    Projects providing rental assistance to clients experiencing homelessness to stay in units where they would not have tenancy rights should be set up as Emergency Shelter (ES)

projects. Projects providing rental assistance to clients in units where they would have tenancy rights should be set up as RRH projects. Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information about rental assistance and project types.

53. **How do grantees safeguard BHBH client data to ensure that HMIS uploads are HIPAA compliant and do not expose client data?**

   Grantees, subgrantees, and/or their contracted providers who are HIPAA-covered entities should review the CoC's Privacy Notice to determine if it meets or exceeds the standard set by HIPAA. If it does, the entity can participate in HMIS. If the Privacy Notice does not, grantees should engage with the CoC to revise the Privacy Notice to meet or exceed the requirements established by HIPAA privacy rules so the HIPAA-covered entity can participate in HMIS. CoC Privacy Notices may be amended and applied retroactively, per the [2004 HMIS Data and Technical Standards Final Notice](#).

   Please note that HMIS privacy and security standards were developed by HUD after careful review of HIPAA standards for securing and protecting patient information. The HMIS standard gives HMIS providers and CoCs broad authority to address matters not expressly covered by HIPAA. Because of this approach during standards development, most CoCs' privacy and security standards will already align with HIPAA standards. To that end, if the CoC's Privacy Notice outlines the mandatory and allowable uses and disclosures of data by HUD, and the AB 977 grantee (as the HIPAA covered entity) is not doing any additional types of uses or disclosures outside of what's listed in the Privacy Notice, then the grantee can potentially participate in HMIS without HIPAA related issues. Since privacy notices are varied and fulfil a legal requirement, grantees should seek advice and review from their legal counsel as appropriate.

Questions About Funding, Other Funder Codes, and Grant IDs

54. **Can multiple rounds of BHBH funding be used for the same HMIS project?**

   Yes. One HMIS project can be funded by multiple rounds of BHBH and/or multiple funding programs. If a project is funded by multiple AB 977 programs, grantees will need to enter multiple sets of funding codes and grant IDs. Please refer to the [HMIS Project Setup Instructions](#) provided by both departments.

Appendix A: List of Acronyms

Acronym	Meaning
AIDS	Acquired Immunodeficiency Syndrome
APS	Adult Protective Services
BFH	Bringing Families Home
BHBH	Behavioral Health Bridge Housing Program
Cal ICH	California Interagency Council on Homelessness
Cal Vet	California Department of Veteran Affairs
CCCCO	California Community Colleges Chancellor's Office
CDBG	Community Development Block Grant
CDEs	Common Data Elements
CDSS	California Department of Social Services
CE	Coordinated Entry
CES	Coordinated Entry System
CoC	Continuum of Care
DHCS	California Department of Health Care Services
DOJ	U.S. Department of Justice
ERF	Encampment Resolution Funding Program
ES	Emergency Shelter
ESG	Emergency Solutions Grant
FAQs	Frequently Asked Questions
FERPA	Family Educational Rights and Privacy Act
FHC	Family Homelessness Grants
FVPSA	Family Violence Prevention and Services Act
FY	Fiscal Year
HCD	California Department of Housing and Community Development
HDAP	Housing and Disability Income Advocacy Program
HDIS	Homeless Data Integration System
HHAP	Homeless Housing, Assistance, and Prevention Program
HHC	Housing for a Healthy California Program
HHS	U.S. Department of Health and Human Services
HHIP	Community Colleges Homeless and Housing Insecure Pilot Program
HIV	Human Immunodeficiency Virus
HMIS	Homeless Management Information System
HOPWA	Housing Opportunities for Persons with AIDS
HP	Homelessness Prevention
HSP	CalWORKs Housing Support Program
HUD	Department of Housing and Urban Development
HYMHP	Homeless Youth Multifamily Housing Program
MHP	Multifamily Housing Program
NPLH	No Place Like Home Program
OVC	Office of Victims of Crime

Acronym	Meaning
OVW	Office of Violence against Women
PH	Permanent Housing
PSH	Permanent Supportive Housing
RRH	Rapid Re-Housing
SHMHP	Supportive Housing Multifamily Housing Program
SUD	Substance Use Disorder
TA	Technical Assistance
UDEs	Universal Data Elements
VHHP	Veterans Housing and Homeless Prevention Act
VSP	Victim Service Provider
VSSR	Veterans Support to Self-Reliance Pilot Program