

Agenda Item V.

California Homeless Data Integration System

Homeless Coordinating and Financing Council meeting April 9, 2019

Purpose and Benefits of Collecting Individual Client Data

Background Information

There are 44 Continuums of Care (CoCs) in California, which are organized to coordinate the implementation of a housing and services system within their respective geographic areas that meet the needs of homeless individuals.¹ The nonprofits and local government entities that participate in the CoCs' projects collect specific data elements prescribed by the United States Department of Housing and Urban Development (HUD), including personally identifiable information (PII) such as name, social security number, and date of birth.² The data elements are entered into the CoC's Homeless Management Information System (HMIS) and "serve as the basis for producing unduplicated estimates of the number of people experiencing homelessness...characteristics of people experiencing homelessness, and patterns of service use."³

The Homeless Coordinating and Financing Council (Council) has a statutory goal set forth in Welfare and Institutions Code section 8275(b)(13) to "create a statewide data system or warehouse that collects local data through Homeless Management Information Systems, with the ultimate goal of matching data on homelessness to programs impacting homeless recipients of state programs," such as Medi-Cal and CalWORKS. Having the ability to collect and analyze data on the demographics and characteristics of homelessness, link data on homeless individuals with data on the services they are receiving, and identify gaps in services and funding, will allow the state to better align resources with needs and identify trends in ways that are not possible without this statewide homeless data integration system. Individual client data (including PII) is necessary in order to be able to link homeless individuals with the state and local services they are receiving, which will better ensure the needs of these individuals are being met.

Project Scope

The Business, Consumer Services and Housing Agency (BCSH) and Council staff have initiated planning and preparation activities to implement an IT solution, the California Homeless Data Integration System (HDIS), to meet the Council's statutory goal. BCSH has determined that an iterative approach, focusing the scope of Phase I on collecting and integrating local HMIS data into a state-level homeless data system, will provide access to meaningful data on homelessness sooner than attempting to build the entire

¹ [WIC § 8260\(b\)](#), [24 CFR § 578.3](#), [24 CFR § 578.7\(c\)\(1\)](#).

² U.S. Department of Housing and Urban Development. *HMIS Data Standards Manual*, pp. 29 – 83. <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

³ U.S. Department of Housing and Urban Development. *HMIS Data Standards Manual*, pp. 29. <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

integrated data system at once. In addition, Phase I will include a state-supported HMIS that CoCs can opt into using as their own HUD-compliant HMIS. The state-supported HMIS will be an excellent alternative for CoCs that lack the resources to implement a robust HMIS at the local level.

The proposed HDIS will collect individual client data, including PII, from CoCs for the sole purpose of producing unduplicated estimates of the number of people experiencing homelessness, gaining deeper insights into the demographics and characteristics of homelessness, understanding patterns of service use, and identifying gaps in services needed to support homeless individuals in gaining or maintaining stable housing. Just as current practice by CoCs requires that clients must agree to share their personal information through an informed consent process, clients will be asked to provide authorization for their PII to be entered into the HDIS. Each person whose data is entered into the HDIS will be given a unique identifier that can link between various data systems without any possibility of revealing the personal information of an individual. The unique identifier will ensure that client level data is de-identified so that individuals' privacy is protected and there is no possibility that personal information could be used to identify a specific person. CoCs that opt into using the HMIS functionality of the HDIS will continue to gather individual client data, including PII, as they are currently doing.

Gathering, storing and using PII is inherently sensitive and entails risk. To effectively mitigate this risk, the proposed HDIS will be required to conform to all relevant state and federal laws, policies, and best practices to protect privacy and ensure data security. Pursuant to the State Administrative Manual⁴, BCSH has completed its security analysis under the Federal Information Processing Standards (FIPS) 199⁵, and has determined that a data breach would result in a serious adverse impact to the individual. The system requirements for the proposed HDIS will include robust data security requirements in compliance with the standards set forth in the National Institute of Standards and Technology (NIST) Special Publication 800-53⁶. The security requirements will mitigate the risk of a security incident. Additionally, Council staff will be trained to manage incidents, should they occur.⁷ The solution will use role-based security to allow only authorized users to have access to the data and to allow them access only to the data they need for their given role.⁸ For example, a researcher employed by the BCSH will be unable to see a service provider's case notes for an individual client. Recognizing the importance of ensuring that data privacy and security are embedded into the HDIS system requirements, the Council has retained a data security and privacy consultant and has engaged BCSH's legal counsel, Information Security Officer, and Chief Privacy Officer as advisors on the project.

⁴ California Department of Technology. *State Administrative Manual*, § 5300.5 *et seq.*
[https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/sam_master_File/chap5300/Chap5300\(print\).pdf](https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/sam_master_File/chap5300/Chap5300(print).pdf)

⁵ U.S. Department of Commerce, National Institute of Standards and Technology. *Federal Information Processing Standards Publication 199*. <https://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.199.pdf>

⁶ U.S. Department of Commerce, National Institute of Standards and Technology. *Special Publication 800-53*.
<https://nvd.nist.gov/800-53/Rev4/impact/moderate>

⁷ California Department of Technology. *State Administrative Manual*, § 5340 *et seq.*
[https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/sam_master_File/chap5300/Chap5300\(print\).pdf](https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/sam_master_File/chap5300/Chap5300(print).pdf)

⁸ California Department of Technology. *State Administrative Manual*, § 5360.
[https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/sam_master_File/chap5300/Chap5300\(print\).pdf](https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/sam_master_File/chap5300/Chap5300(print).pdf)

Once implementation of Phase I of the HDIS begins, the Council will start planning for Phase II, which will match the HMIS data to data in other state data systems for programs such as Medi-Cal and CalWORKS. In developing Phase II, the Council will partner with stakeholders to identify and prioritize the most relevant state programs for data matching with HMIS data. Just as in Phase I, collecting client level data, including PII, will be critical to expanding the knowledge and understanding about homelessness in California and how best to align resources with strategies to effectively address homelessness.

Frequently Asked Questions

Question: Will the data be used for case management?

Answer: The State will not use the data for case management. CoCs that choose to opt into the state-supported HMIS could use the system for case management, consistent with current practice at the local level.

Question: How will the Council guard against unforeseen or unauthorized uses of the data?

Answer: The Council is exploring strategies to ensure that the data collected in the HDIS can only be used for specified purposes by specified users. Any other uses will be expressly forbidden.

Question: What protections will the system include for victims of domestic violence and other sensitive groups?

Answer: State and federal law provides additional protection regarding the collection and use of PII for victims of domestic violence and the HDIS will be fully compliant with these laws. The Council is also assessing the need for additional protections for veterans, individuals enrolled in Deferred Action for Childhood Arrivals, and individuals with prior or current substance use disorders.

Question: Will the data collected in Phase I of the HDIS be subject to the Health Insurance Portability and Accountability Act (HIPAA)?

Answer: While each of the 44 CoCs in California is unique, CoCs are not generally considered covered entities under HIPAA. CoCs do not generally enter protected health information (PHI) into HMIS, and CoCs generally do not receive PHI from service providers.