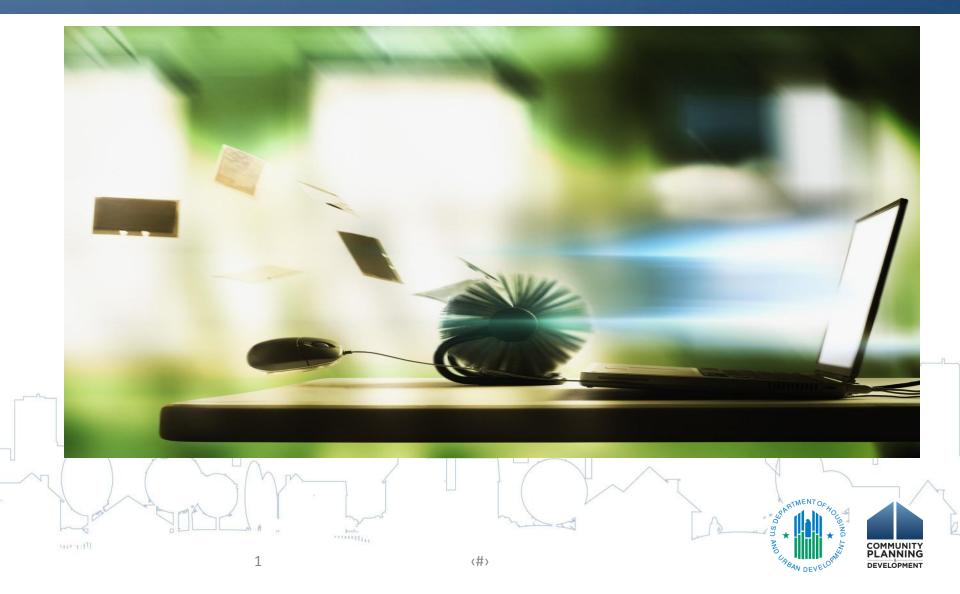# Homeless Management Information Systems (HMIS)

What is HMIS?

- A Homeless Management Information System (HMIS) is a *locally administered*, electronic data collection system that stores longitudinal person-level information about persons who access the homeless service system

- HMIS is HUD's response to a Congressional Directive to capture better data on homelessness

Open vs. Closed System

- Open HMIS- Providers are able to search for a client and see where they have received services

- Closed HMIS- Providers are only able to "see" their own clients- cannot tell where they are receiving other services

- Many systems have moved from closed to open or are a hybrid

Why HMIS is Important?

- National data on homelessness is critical for HUD reporting and informs key policy decisions

- HUD requires communities to submit sheltered data from their HMIS for annual Point in Time (PIT)

- Local HMIS data can be used to inform local planning and drive the local decision making process

- HMIS can support individual case planning and service coordination among providers entering data

History of HMIS Data & Technical Standards

- HMIS Data Standards were developed by focus groups of community stakeholders, researchers, technology experts and consumers

- Data and Technical Standards were initially published in July 2004

- Sections 2 and 3 of the original standard were replaced in March 2010 while the remaining sections of the 2004 standard remain in effect

- Focused on standards, not development of a system

History of HMIS Data Standards

What the HMIS Standards Don't Do:

- Set a specific software to be used
- Limit a CoC or HMIS from requiring the collection additional data elements
- Limit a CoC or HMIS from requiring additional client privacy and system security protections
- Limit a CoC or HMIS from adding additional functionality (beyond HUD purposes)
- Stay static (they are updated periodically)

HMIS Data Standards

There are 3 data element categories outlined in the March 2010 Revised HMIS Data Standards

- Program Descriptor Data Elements (PDDE)

- Universal Data Elements (UDE)

- Program-Specific Data Elements (PSDE)

The Data Standards define specific, allowable responses for each data element

Not all the data in the Data Standard are required to be collected by every program

Each program will collect at least a subset of data

HMIS Resources

- On www.hudhre.info:

  - 2010 HMIS Data Standards

  - 2004 HMIS Data and Technical Standards

  - Draft HMIS Rule – December 2011

  - HMIS 101 training materials

School District Collaboration in Youth Count!

Presented by:

John McLaughlin, Federal Coordinator for EHCY

Overview of Presentation

Introduce Federal statutes governing school district surveying and disclosing of student information on homeless students

- Clarify allowable data disclosure between LEAs and Youth Count! collaborators with national examples

- Share effective strategies for collaboration on Point-in-Time counts

Youth Count! Webinar

Youth Count! Opportunities for Homeless Educators

To count all unaccompanied youth identified as homeless (UHYs) by local educational agencies (LEAs) and unduplicate across agencies

To develop and disseminate strategies for collaboration and coordination across different definitions, reporting methods, and systems of administration

To learn about UHY's disengaged from school and the needs of UHY subgroups that schools serve

To coordinate and target interventions better

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McKinney-Vento Homeless Assistance Act and UHY's

The Education for Homeless Children and Youth (EHCY) definition of homelessness is in Section 725(2), Subtitle B, Title VII of the McKinney-Vento Homeless Assistance Act (MVHAA) http://www2.ed.gov/programs/homeless/legislation.html

EHCY non-regulatory guidance is available at http://www2.ed.gov/programs/homeless/legislation.html

Unaccompanied Homeless Youth (UHY's) are defined as a "youth not in the physical custody of a parent or guardian" (Section 725 (6)).

UHY's have rights under the MVHAA/EHCY program to enroll in the school district where they are residing in a homeless situation, request transportation to the school of origin, or dispute a school placement or barrier to enrollment.
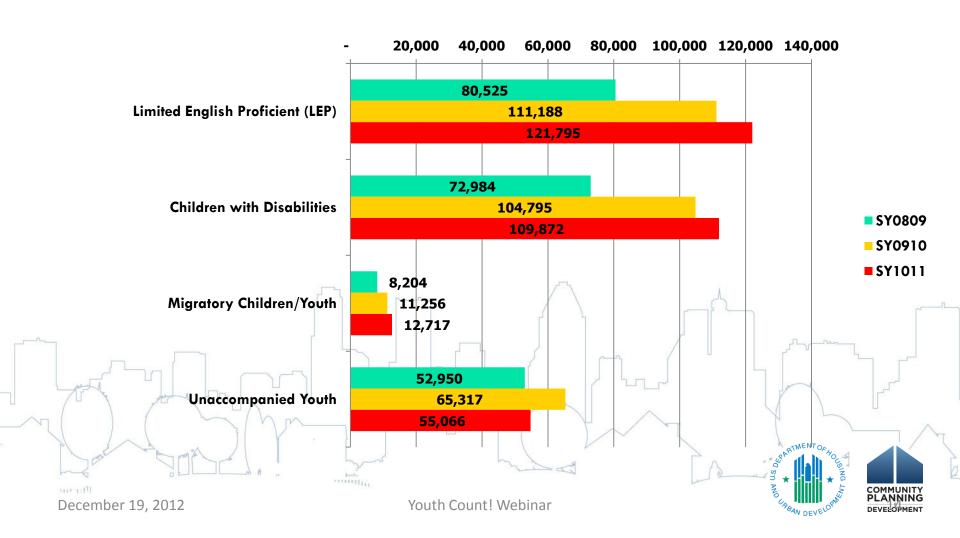
EHCY Reporting on UHY's

1,065,794 children and youth were identified as homeless and enrolled in LEAs between July 1, 2010 and June 30, 2011.

883,816 homeless students were served by LEAs with subgrants (20% of LEAs); 55,066 (or 6.2%) of them were UHY's.

Through the 2011-12 school year(SY), UHY's are reported only when SERVED by LEAs with subgrants.

From SY 2012-13, all LEAs will report on identified UHY's ENROLLED in them.

Many more LEAs may be identifying UHY's now but won't report them to their SEAs until Fall 2013; some only prepare cumulative annual unduplicated counts and others provide SEAs with more frequent periodic or point-in-time counts.

Homeless Subgroups Served by LEAs with Subgrants

Legend:
- SY0809 (teal)
- SY0910 (yellow)
- SY1011 (red)

Limited English Proficient (LEP)
- 80,525
- 111,188
- 121,795

Children with Disabilities
- 72,984
- 104,795
- 109,872

Migratory Children/Youth
- 8,204
- 11,256
- 12,717

Unaccompanied Youth
- 52,950
- 65,317
- 55,066

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UHY's Served in SY 10-11 by LEA subgrantees in 9 sites

Continuum of Care LEAs with Subgrants	Reported # of UHY's Served by Subgrant
Boston	16
Cleveland	541
Hennepin County, MN	261
Houston	287
Los Angeles	530
New York	647
Seattle/King County	No subgrantee LEA
Washington State BOS	2,038 (all counties)
Winston-Salem-Forsyth	20
Total	4,340

COMMUNITY PLANNING DEVELOPMENT

Federal EHCY Primary Nighttime Residence Reporting

All LEAs must report to ED, annually via their SEAs, the primary nighttime residence (PNR) at the time of a student's identification as homeless in these categories:

Shelters: Shelters, transitional housing, awaiting foster care

Doubled-Up: e.g., living with another family

Unsheltered: e.g., cars, parks, campgrounds, temporary trailer, or abandoned buildings

Hotels/Motels

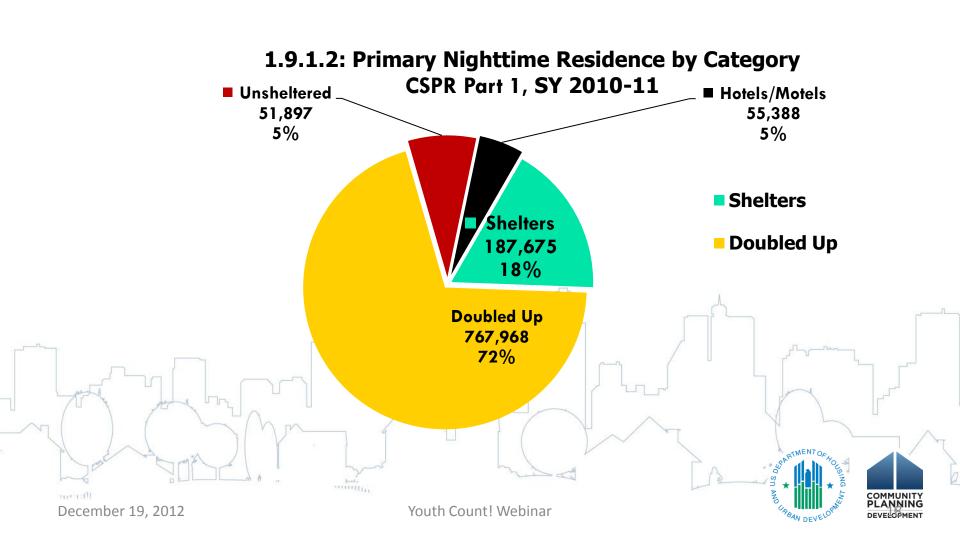Total (for LEAs with and without subgrants)

3-Year PNR Comparison, SY 2008-09 to SY 2010-11

CSPR Part 1 SY 2010–11 Question 1.9.1.2 Primary Nighttime Residence	SY0809	SY0910	SY1011	Percent Change Between SY0809 and SY0910	Percent Change Between SY0910 and SY1011	Percent Change Between SY0809 and SY1011 (Three Years)
Shelters	211,152	179,863	187,675	-15	4	-11
Doubled Up	606,764	668,024	767,968	10	15	27
Unsheltered	39,678	40,701	51,897	3	28	31
Hotels/Motels	57,579	47,243	55,388	-18	17	-4
Total	915,173	935,831	1,062,928	2	14	16

One-Year PNR Snapshot SY 2010-11

1.9.1.2: Primary Nighttime Residence by Category
CSPR Part 1, SY 2010-11

- Unsheltered
  51,897
  5%
- Hotels/Motels
  55,388
  5%
- Shelters
  187,675
  18%
- Doubled Up
  767,968
  72%

■ Shelters
■ Doubled Up

Family Educational Rights and Privacy Act (FERPA) of 1974

There have been many updates to regulations and guidance for FERPA that can be viewed at www.ed.gov/fpco

FERPA generally prohibits LEAs from disclosing student education records and personally identifiable information (PII) from such records to other parties without parental consent.

PII includes direct and indirect identifiers, as well as information that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.

Regulations and ED guidance concerning FERPA clarify that LEAs are permitted to disclose aggregate student information that does not include any PII for research and evaluation purposes
(34 CFR § 99.31(b)(1)).

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Disclosure of Directory Information Under FERPA

FERPA permits but does not require LEAs to disclose directory information, which may include the student's name, address, telephone listing, and grade level (34 CFR 99.3, definition of "directory information").

The LEA may disclose directory information to other agencies provided that the LEA has both publicly designated that information as directory information and either the parent or eligible student has not opted out:

-the parent or guardian if the youth is under age 18

-the youth if age 18 or over

-the youth if an emancipated minor

-or any youth enrolled in a post-secondary institution.

(34 CFR 99.3 for definitions of "eligible student" and "parent", 99.31(a)(11) and 99.37(a))

UHY Consent for Disclosure

FERPA does not specifically afford rights to UHYs who are unemancipated minors under 18 and in attendance at elementary or secondary schools but who are separated from their parents; nevetheless, schools may use their judgment in determining whether these UHYs are responsible enough to exercise certain privileges, such as providing consent for disclosure (34 CFR § 99.5(b); also see Q&A 6: http://www2.ed.gov/policy/gen/guid/fpco/pdf/ferpa-disaster-guidance.pdf).

MVHAA-EHCY requires LEAs to immediately enroll UHY's identified by local liaisons or designees and they may sign LEA forms requiring adult signatures for full participation in school activities. However, liaisons or designees cannot sign consent forms to disclose student information to other agencies or opt out of directory information.

FERPA and Unduplication of Data Across Agencies

An LEA may disclose to other agencies the number of unaccompanied youth enrolled in the LEA (or served by its subgrant program) who are experiencing homelessness during the time of the point-in-time count.

If the LEA wishes to provide additional disaggregated information about UHY's, for example, by grade level and primary nighttime residence category, it must be careful that it not be PII.

LEA staff may view PII, such as the surveys conducted by other agencies, for the purpose of unduplicating the UHY count it had provided. LEAs can then disclose an unduplicated UHY count.

An LEA may not confirm or correct PII from individual student education records at the request of other agencies, as that would constitute a disclosure under FERPA.

Paperwork Reduction Act (PRA), EHCY Data and Youth Count! Participation

Under the PRA, ED's EHCY program performance data collection is approved by the Office of Management and Budget (OMB), after a public comment process announced in the Federal Register, at least once every 3 years. Any data collection involving more than 9 respondents has to go through OMB Clearance.

Without OMB clearance, ED cannot require LEAs to verify the homeless status of identified unaccompanied homeless youth during the PIT count period. However, grantees of other agencies may ask LEAs for data without PRA implications if the collection is not required as a condition of their grants.

LEAs may also provide aggregate grade level enrollment and primary nighttime residence information as it is also reported to ED by all LEAs (but recall from FERPA that there cannot be PII in this disaggregation).

Some LEAs may also have information on homeless students that they report to SEAs such as race/ethnicity and gender and may offer it to other parties in aggregate form; however, ED cannot ask for this due to the PRA.

What is the Protection of Pupil Rights Amendment (PPRA)?

The PPRA of the General Education Provisions Act (GEPA) is a federal law that governs the administration to students of certain types of surveys concerning some of the following protected areas:

> -mental or psychological problems of the student or the student's family;
>
> -sex behavior or attitudes;
>
> -illegal, anti-social, self-incriminating, or demeaning behavior.

An LEA must "directly" notify, such as through U.S. Mail or email, parents of students (or an emancipated minor) who are scheduled to participate in the specific activities or surveys and provide an opportunity for parents to opt their child out of participation in the specific survey or activity.

PPRA transfers the rights of parents under the PPRA to students who are 18+ or emancipated minors (20 U.S.C. 1232h(c)(5)(B)).

Surveys and Human Subjects Research

The (Federal) Common Rule for the Protection of Human Subjects in Research (Regulation) applies if the research is done by a participating agency or is funded by a participating agency through contract or grant (see 34 CFR 97).

Under the Federal Wide Assurance (FWA), institutions must establish Institutional Review Boards (IRB) to review proposed research for adequate human subject protections.

LEA staff should not administer a survey developed locally by other agencies to UHY's, but they may let UHY's know about other organizations that are conducting these surveys if LEA policies permit this.

LEA staff should try not to stigmatize UHY's in informing them of the survey and let the youth know about, if feasible, the survey's purpose and content, the potential benefits and the right not to respond to all questions.

Summary of Ways LEAs May Participate in PIT Counts

Disclose aggregate data on UHY's enrolled or served by LEA (also by grade level and PNR if not PII).

Reconfirm the homeless status of the students identified and provide a PIT count.

Let students know about Youth Count! events or participating organizations, if LEA policies permit.

Review surveys with PII administered by other agencies for the purpose of unduplicating counts

Strategies for Collaboration and Data Sharing

Many LEAs have already collaborated in interagency homeless children and youth counts in the following ways:

Getting homeless parent or guardian consent at enrollment or afterwards, also for UHY's who are 18 and over (e.g., Texas--Cypress-Fairbanks LEA near Houston)

Entering information directly into the local Homeless Management Information System with parental consent (Michigan—Detroit/Wayne County, Upper Peninsula LEAs; North Carolina—Winston-Salem/Forsyth)

Creating interagency memorandums of agreement (Pennsylvania--Philadelphia and Pittsburgh) for database sharing for certain purposes

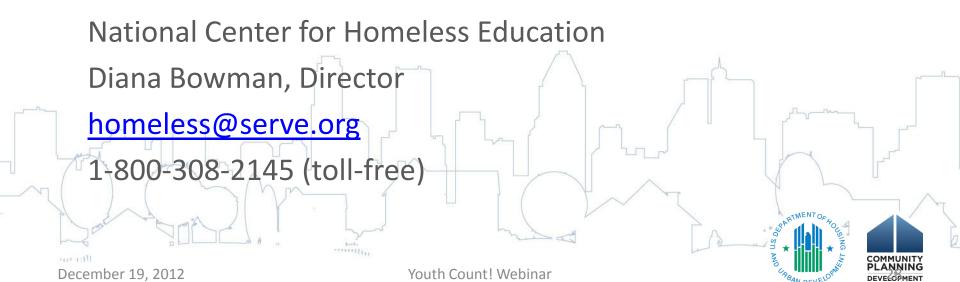Encouraging staff to volunteer in UHY point-in-time counts (Minnesota-Anoka-Hennepin LEA)

EHCY Youth Count!
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Additional Youth Count! Resources

❑ **Webinars & resources**

    ❑ Other RHYTTAC Youth Count! Webinars www.rhyttac.net

    ❑ National Alliance to End Homelessness
http://www.endhomelessness.org/pages/youthcount)

    ❑ Family and Youth Services Bureau/ACYF/HHS:
http://www.acf.hhs.gov/programs/fysb/resource-library

❑ **HUD PIT guidance**:
http://hudhre.info/index.cfm?do=viewResource&ResourceID=4697

❑ **National Center on Homeless Education guidance on Federal Data Collection for Homeless Youth**: http://center.serve.org/nche/ibt/sc_data.php

❑ **US Interagency Council on Homelessness:**
http://www.usich.gov/population/youth/a_framework_for_ending_youth_homelessness_2012/youth_count/

Webinar Contact Details

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