



KCRHA
King County Regional Homelessness Authority

Coordinated Entry for Survivors of Domestic Violence

Current Challenges in Domestic Violence Coordinated Entry (CE-DV) Reporting and Compliance

Community Impact

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Agenda

- Background
- Review of Progress
- Recommendation
- **Decision – January 2025**





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Background

Responsibility

HMIS and comparable database users are responsible for verifying that any software they use meets their needs, including federal compliance and reporting requirements. CoCs are responsible for ensuring that a comparable database is implemented for Victim Service Providers (VSPs) operating within the CoC.



Washington State HMIS

Victim Service Providers (VSPs) and HMIS:

- VSPs in Washington State use HMIS for their comparable database.
- All data entered by VSPs must be recorded as "consent refused" or "anonymous" to protect privacy.
- Great care is taken to ensure these records are not identifiable.

Compliance with VAWA:

- VAWA prohibits the entry of Personally Identifiable Information (PII).
- Washington State is fully compliant with VAWA's regulations regarding PII.

Benefits of VSP Participation in HMIS:

- VSPs are eligible for certain funding opportunities, including:
 - State CHG (Community Homelessness Grant)
 - SDG (State Document Recording Fees)
- Participation improves coordination among service providers, provided proper Release of Information (ROI) agreements are in place.

Informed Consent Procedures:

- Washington has the most protective informed consent procedures in the nation, based on unique state law.



Current Challenges with Reporting and Compliance Domestic Violence Coordinated Entry (CE-DV)

- **KCRHA Funding Award:** KCRHA was awarded funding to implement a Domestic Violence Coordinated Entry (CE-DV) system, aimed at expanding CE services for DV survivors.
- **Grant Awarded to CEGV:** The Coalition Ending Gender-Based Violence (CEGV) was contracted to design and implement the CE process, including assessments, prioritization, and housing referrals.
- **Non-Compliant Process:** Prior to the grant, CEGV used a system for tracking DV-related data that did not comply with HUD standards, which require data to be tracked within a comparable database.
- **APR Submission Issue:** For the March 31, 2024 Annual Performance Report (APR), the CE-DV program was not set up within HMIS, preventing any data from being reported.
- **Past Reporting Method:** Historically, KCRHA submitted the same APR for both the mainstream CE program and the DV-related CE program.
- **Data Gaps in APR:** Due to the lack of a distinct CE-DV program in HMIS, the APR submission for the CE-DV project was missing the required data.

Without proper system and reporting in place, KCRHA is at risk of non-compliance with federal reporting standards, which could jeopardize future DV funding.



Who is involved?

Stakeholder	Status
KCRHA	KCRHA has completed requirements gathering and analysis for a recommendation
CEGV - VSPs	CEGV awarded \$60,000 budget with no ongoing funding source. Researching best practice implementation with bi-weekly KCRHA and vendor meetings on configuration options. Collaborating with VSPs for community input and buy-in.
VSPs	VSPs include DV-housing resource providers (currently active in HMIS) and other DV direct service providers who conduct referrals into CE-DV. VSPs inform the design, process, and flow of CE-DV.
Bitfocus	Currently working on finalizing cost estimates and configuration details, including admin support options and system build feasibility. Aiming for internal approval to proceed with system configuration
Department of Commerce	Needs to approve the integration of DV programs within HMIS and understand the implications for compliance with VAWA and other regulations. Needs detailed planning from KCRHA and CEGBV to move forward
HUD Field Office	Needs to be kept informed of system design, ensuring it aligns with HUD's regulatory requirements
SPC Committee	Will need to decide between parallel or integrated system configurations based on feasibility, costs, and operational impact.
CE Committee	Must consider how the DV system will interact with mainstream CE, ensuring DV survivors' data is protected while maintaining efficient workflows.



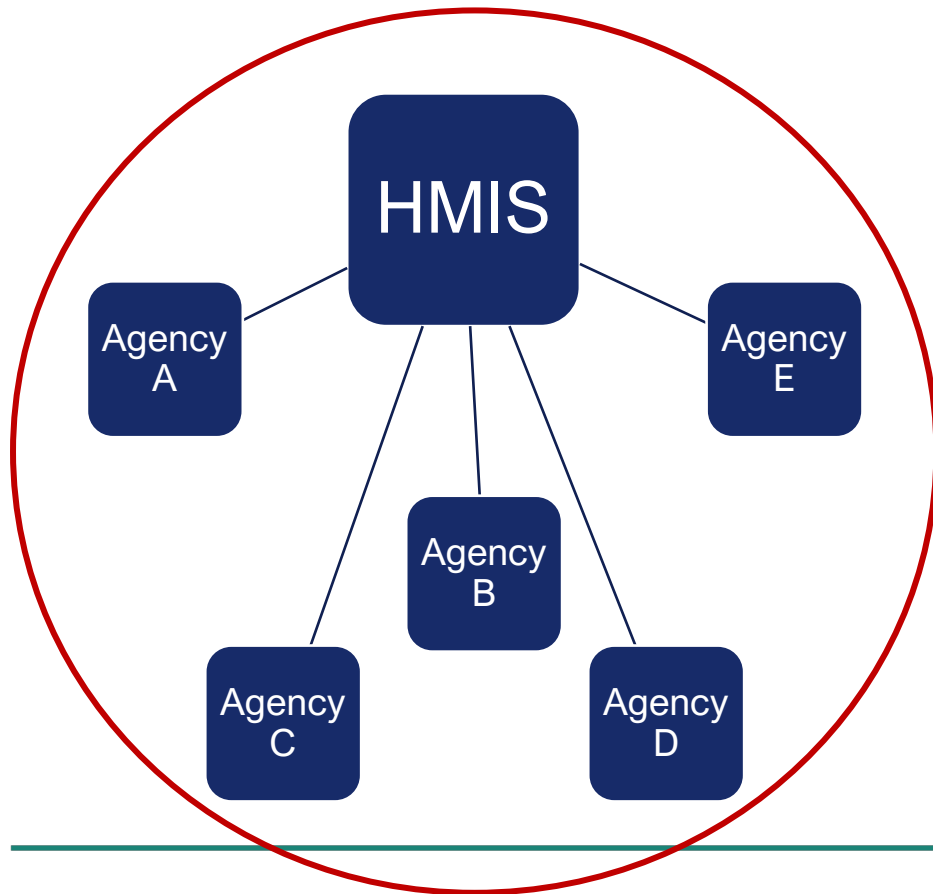


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Analysis

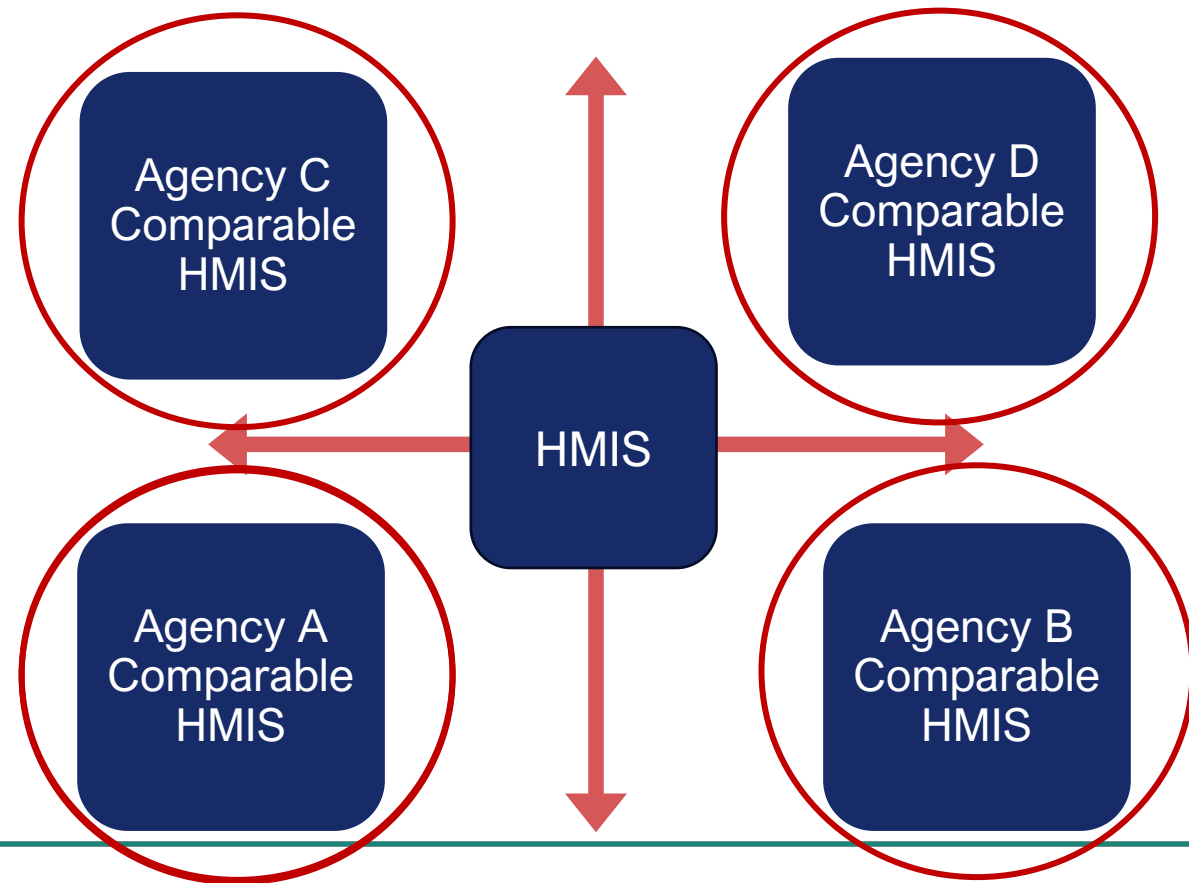
HMIS Enhancement

Shared Referrals
System-Wide Analysis
Transparent Coordination
Unified CE DV APR



Comparable HMIS

Referrals Not Shared
Program Analysis Only
Coordination outside of HMIS
Individual APRS



Analysis: Key Findings

Cost Considerations:

- **Comparable Database:** Transitioning to a comparable database would incur significant **additional costs**, including **\$100K per year** for system administration and separate licensing for each DV agency. This represents a substantial increase in financial burden without clear ongoing funding sources.
- **System Maintenance:** Continuing with the current HMIS system could reduce costs, as it leverages existing contracts and infrastructure, while transitioning to a separate comparable database would require extensive new resources.



Analysis: Key Findings

Capacity and Staffing:

- **CEGV's Capacity:** CEGV currently has **1 FTE** responsible for coordinating services across **14 DV service agencies**. The workload required to manage a separate, comparable database for each agency would exceed the current staffing capacity.
- **Complexity of Implementation:** Each DV agency would need to operate a **separate, "walled off" security architecture** within the comparable database. This would prevent data sharing across agencies, create duplicate client records, and hinder coordinated case management.



Analysis: Key Findings

Data Security and Coordination:

- A key challenge with a **comparable database** is that each DV agency (VSP) would have its own isolated system with no cross-agency data sharing. This “walled off” approach could reduce **data security** by making it harder to coordinate services between agencies, which is contrary to the intent of the law designed to keep DV survivors safe while supporting efficient case management.
- **Data Duplication and Reporting:** The inability to share data across agencies would result in **duplicate records**, and each agency would need to submit its own **Annual Performance Report (APR)**, which prevents the ability to consolidate data for a comprehensive understanding of the system’s performance.



Analysis: Key Findings

Operational and Technical Issues:

- **Separate Logins and Systems:** Staff would need to manage **multiple logins and systems**, adding complexity and increasing the risk of errors. This lack of integration would make it harder for caseworkers to have a comprehensive view of a survivor's services and housing status.
- **Referral and Prioritization Process:** Each DV agency would need to maintain its own separate **referral queue** and **prioritization methodology**, making it harder to track clients across agencies and reducing overall system efficiency with a comparable HMIS.



Analysis: Key Findings

Compliance and Reporting Challenges:

- Reporting on system performance for the DV CE program would be **fragmented**, as each agency would submit its own APR. This lack of a consolidated report would complicate efforts to assess the overall impact and effectiveness of the system.
- **System-wide Analysis:** The inability to integrate data from all DV agencies into a single database would create challenges in performing **system-level analysis**, including tracking trends, monitoring equity, and analyzing overall performance.



Analysis: Key Findings

Scalability and Future Growth:

- Moving to a **comparable database** introduces **limitations** in scalability and functionality, particularly around **user licenses cost**.
- The **lack of centralized control** over the system for DV providers means that scaling or adjusting the system for future growth would be more difficult and less flexible compared to the existing HMIS setup.



Analysis: Key Findings (*Pro Comparable Database Reasons*) - update title

Compliance with HUD Standards: A comparable database is required to meet HUD's standards for securely tracking and storing DV-related data, ensuring compliance with federal guidelines and protecting the privacy of survivors. We would not have the reports ready if we do this (we'd give the money back to HUD to not do nothing).

Capacity and Coordination: The comparable database may encourage a standard and transparent process to be adopted and shared by the CEGV and better coordinate services across 14 DV agencies.

Cost and Sustainability: The transition to a comparable database involves an initial investment, but the long-term benefits in system functionality and compliance could justify the costs, and funding opportunities for DV-specific activities could arrive in the future.

Enhanced Data Security and Reporting: A comparable database ensures improved tracking of DV-specific data, generates more accurate system-level performance reports, and allows CEGV to monitor individual APR submissions more effectively.

Operational Efficiency: The system allows for tailored assessments and survivor-centered workflows, improving the speed and accuracy of referrals and prioritization for housing interventions.

Governance and Flexibility: A comparable database offers autonomy to each DV agency, ensuring privacy controls and allowing for flexible configurations to meet their specific operational needs.

System Integration: The comparable database better accommodates the specialized needs of DV providers and ensures compliance with HUD standards, while also allowing for future growth and system updates to meet emerging needs.



Analysis: Key Findings - *summarizes key findings for recommending config - (clean up title)*

Cost Considerations: Transitioning to a comparable database would add significant costs, including \$100K annually for system administration and licensing for each DV agency. Continuing with the current HMIS system would incur lower costs by leveraging existing infrastructure and contracts.

System Maintenance: Maintaining the current HMIS system is more cost-effective than transitioning to a comparable database, which requires new resources and administration.

Capacity, Staffing, Cost: CEGV currently has 1 FTE responsible for coordinating services across 14 DV service agencies, which is insufficient to manage multiple, separate databases.

Complexity of Implementation: Each DV agency would require its own isolated database system, which would prevent data sharing and lead to duplicated client records.

Data Security and Coordination: The “walled off” approach in a comparable database would decrease data security by preventing coordination between agencies, which undermines the goal of efficient, equitable, and survivor-centered case management.

Data Duplication and Reporting: With each agency having isolated systems, data would be duplicated, and each agency would need to submit its own APR, complicating system-wide reporting.

Operational and Technical Issues: Managing multiple logins and systems would add complexity and increase the risk of errors, making it harder for caseworkers to track a survivor’s status across agencies.

Referral and Prioritization Process: Each DV agency would need to maintain its own referral queue and prioritization methodology, making it harder to track clients across agencies, reducing system efficiency, and inhibit consistent prioritization processes across VSPs.

Compliance and Reporting Challenges: Reporting on system performance would be fragmented, with no ability to generate a consolidated APR or assess the overall effectiveness of the system.

System-wide Analysis: Without integrating data across agencies, conducting system-wide analysis to track trends, monitoring equity, or assessing performance would be difficult.

Scalability and Future Growth: A comparable database would limit scalability, particularly regarding user licenses and integrating new DV-specific data elements.

Centralized Control: The lack of centralized control over the system would make it difficult to adjust or scale the system to meet future needs for DV agencies.



Estimated 1st Year Cost

Item	Frequency	Price
Platform License	Annually	\$7,200.00
Agency Licenses	Annually	\$2,400.00
Admin Users	Annually	\$1,800.00
Enterprise Users	Annually	\$14,400.00
License Activation: Admin	One-time	\$150.00
License Activation: Enterprise	One-time	\$3,500.00
Standard Implementation Support	One-time	\$3,000.00
Training Access for System Admin	One-time	\$0.00
Comparable Database System Admin: Base	Annually	\$50,000.00
Comparable Database Admin Support	Annually	\$5,250.00
Total Annual Costs		\$81,050.00
Total One-Time Costs		\$6,650.00
Overall Total		\$87,700.00





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Conclusion

Analysis: Conclusion

- The analysis indicates that transitioning to a **comparable database** for the CE-DV system would result in significant **costs** and **operational challenges**. CEGV currently lacks the capacity to manage this process, with only 1 FTE supporting 14 DV agencies. Additionally, there is **no known ongoing funding** to sustain this transition. The implementation of a comparable database would create **separate, isolated systems for each agency**, increasing the risk of **data duplication**, decreasing **service coordination**, and making it harder to monitor the system's overall performance.
- Given these challenges, a comparable database appears to be an **inefficient and costly solution** that could compromise the safety and support of DV survivors. The recommendation is to explore alternative approaches that maintain **data security, coordination, and efficiency** within the context of HUD compliance, while ensuring sustainability and the ability to meet future needs.





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Recommendation

Middle Ground

- The CI team recommends configuring the current HMIS system to enhance the security of existing programs.
- This configuration would be in accordance with the Department of Commerce's guidelines, and it's more secure than the current guidelines require.
- A "walled-off" environment would be created, accessible only to DV providers.
- The CE-DV system would be able to operate with greater transparency.
- This approach would facilitate federal reporting and local analysis.
- It would establish a more secure process by standardizing agency procedures.
- Each DV agency would be responsible for their own data entry, reducing burden.



Solution Portability

- Configuring the HMIS system in this way would create a foundation for future migration to a comparable database if HUD provides clearer guidance on securely sharing client data outside the HMIS.
- This setup would allow the system to adapt to future increases in funding or regulatory requirements changes.
- Maintaining a CE-DV Annual Performance Report (APR) within the HMIS framework would provide valuable insight into the program's performance.
- The APR would establish a baseline for tracking progress and assessing the system's effectiveness.
- This approach would help ensure that any future transition to a comparable database is based on a clear understanding of the system's needs.



Current Review

Stakeholder	Status
KCRHA	KCRHA has completed requirements gathering and given its recommendation to configure HMIS
CEGV	CEGBV has been working with KCRHA bi-weekly and are currently engaged in stakeholder meetings about the HUD requirements and discussing standardizing processes within the current DVCHAP (Domestic Violence Coordinated Housing Access Point) for coordinated entry
VSPs	VSPs are active in DVCHAP, are the foundation to survivor-centered housing resource access, inform standardization of processes through trauma-informed lens, and are anticipating the evolution of DVCHAP into a more streamlined database.
Bitfocus	Currently working on finalizing cost estimates and configuration details, including admin support options and system build feasibility. Aiming for internal approval to proceed with system configuration
Department of Commerce	Needs to approve the integration of DV programs within HMIS and understand the implications for compliance with VAWA and other regulations. Needs detailed planning from KCRHA and CEGBV to move forward
HUD Field Office	Needs to be kept informed of system design, ensuring it aligns with HUD's regulatory requirements and notified when the CE-DV has a fully developed APR reporting process.
SPC Committee	Will need to decide between a comparable or integrated system configurations based on feasibility, costs, and operational impact
CE Committee	Must consider how the DV system will interact with mainstream CE, ensuring DV survivors' data is protected while maintaining efficient workflows



Next Steps

- Receive approval from the Department of Commerce on the configuration.
- Confirm with Bitfocus that there is approval internally to build a second CE program in HMIS that only include DV providers.
- Implement CE-DV and monitor activities and progress using HMIS.





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ADD Slides

- Concerns that KCRHA will take over this process
- Coalition members can still be involved with our boards and committees,
- Let's get a schedule for a feedback from them so they have a 2 meeting feedback session with a update session with a calendar.
- Risks for all of us and the families and the people.
- Federal Report CE DV APR.
- Timeline of decisions , who is the decision makers,
- The issue is that the providers are worried about going into HMIS.
- Be clear about the restrictions
- DV CHAP and what we can influence and design and make it work for system, and our programs.
- Process Maps – Visuals ; See the configuration of the system the HMIS ;



- How to define a VSP :

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- <https://files.hudexchange.info/resources/documents/Coordinated-Entry-and-Victim-Service-Providers-FAQs.pdf>

- **When to use a comparable database:**

- <https://files.hudexchange.info/resources/documents/HMIS-When-to-Use-a-Comparable-Database.pdf>

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- **Reporting requirements for comparable database:**

- <https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-VSP-Comparable-Database-and-Reporting-Requirements.pdf>

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- **New vendor checklist for deciding on a comparable database:**

- <https://files.hudexchange.info/resources/documents/Homeless-System-Response-Comparable-Database-Vendor-Checklist.pdf>

- **Bitfocus Comparable Database Example Implementation: Hope System**

- <https://onesf.bitfocus.com/hope-system>

