Choosing a Comparable Database: Aligning Data and Confidentiality, A Case Study for Domestic and Sexual Violence Coalitions

What is a "Comparable Database"?

The U.S. Department of Housing and Urban Development (HUD) requires that recipient and subrecipients receiving HUD funding "shall collect data on the use of funds awarded and persons served with this assistance in HUD's Homeless Management Information System (HMIS) *or other comparable database*."[1] HUD envisioned HMIS systems as a way for communities to create data-driven solutions to ending homelessness in communities. HMIS systems assist homeless assistance providers to coordinate care, manage their Continuum of Care and Emergency solutions homelessness resources, and report outcomes to HUD.

However, if the recipient or subrecipient is a Victim Service Provider (VSP) (defined by the Violence Against Women Act [VAWA]), it is prohibited from entering client-level data into an HMIS and instead should use a comparable database to collect and report the required aggregate data.

Sharing personally identifiable information (PII)[2] in a HMIS database creates inherent safety risks for survivors of domestic and sexual violence fleeing from violence in need of confidential services. HMIS databases' information is shared with third parties beyond a VSP agency and many times are open systems shared among community providers to promote coordination across systems. The sharing of personal and confidential PII means many homeless service providers have access to PII that could potentially allow an abusive partner to locate a survivor who is fleeing.

As such, HUD's statutes require that subgrantees that are victim service providers as defined by the VAWA Reauthorization Act of 2005 (VAWA)[3], and updated in 2013[4], cannot enter PII in HMIS and must use a "Comparable Database." VAWA defines a VSP as a nonprofit or nongovernmental organization; this includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

This requirement means that VSPs must find, purchase, use, and coordinate a database that complies with the current HUD HMIS Data and Technical standards and has the ability to create unduplicated aggregate reports in the HUD-required Sage reporting format about the individuals and families served with HUD

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[1] American Recovery and Reinvestment Act of 2009 (ARRA), p. 107
[2] 34 USC §12291(a)(20).
[3] Violence Against Women and Department of Justice Reauthorization Act of 2005, Pub. L. 109-162.
[4] S. 47 — 113th Congress: Violence Against Women Reauthorization Act of 2013.
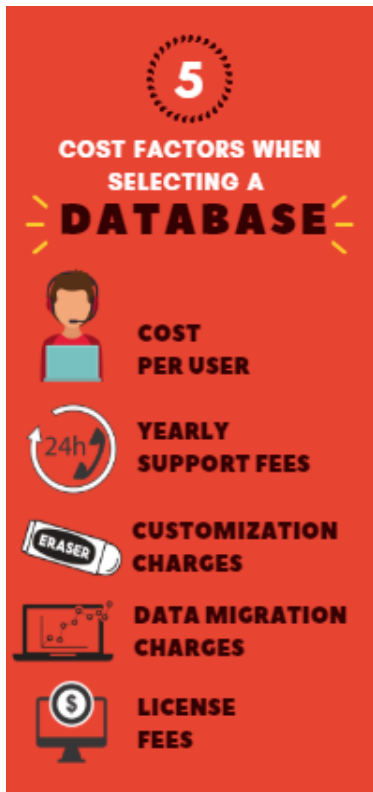
funds. An unduplicated aggregate report is generated by an individual VSP agency, ensuring that the individual survivor served is only counted once. Data within the agency is compiled to be submitted to HUD in the aggregate. In addition, the Comparable Database must also meet all confidentiality requirements related to PII under VAWA, the Victims of Crime Act (VOCA), and the Family Violence Prevention and Services Act (FVPSA). Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funds may be used to establish and operate a comparable database.

What factors should be analyzed?

Victim Service Providers, and state domestic and sexual violence coalitions working to develop a statewide data framework, must analyze a number of factors in the process of identifying a Comparable Database that will meet these requirements. This

If you are looking for support as you make your decision, head to the National Network to End Domestic Violence (NNEDV) **Safety Net** Team's resource on selecting a database: https://www.techsafety.org/selecting-a-database/.

resource highlights the process employed by the Texas Council on Family Violence (TCFV). TCFV is one of the largest domestic violence coalitions in the nation, with a statewide membership organization comprised of family violence service providers and allied patners. TCFV oversees their statewide VSP Comparable Database coordination and partners with their Balance of State HMIS lead to provide required HUD funding reports from VSPs. This resource reviews the factors influencing TCFV's decision in selecting a Comparable Database. TCFV's process is particularly illuminating for state coalitions but can also be helpful to local programs.

Cloud vs. Locally Held

The first thing to determine when considering the best database fit is whether the agency wants to utilize a cloud-based system or a database that is held locally on an internal server. While there are a pros and cons to both options, it is important to determine whether third parties will have any access to the system. Due to the requirements in VAWA, VOCA, and FVPSA, an agency must ensure there is no external access to the survivors' PII by any third party, including other VSPs, state domestic violence and/or sexual assault (DV/SA) coalitions, vendor staff, HMIS lead staff, or CoCs staff. While there are some safeguards that can be put in place to protect client information held on the cloud, the determination to move forward with a locally held database made the most sense for TCFV and its member agencies. To learn more about cloud vs. locally held databases, please see NNEDV's In-house products vs. cloud services.

Ease of Use & Cost to Programs

Other important pieces to consider are how easy the database is to use and the projected annual cost. After reviewing and seeing demonstrations of many databases, TCFV chose a database vendor that was a good fit for their needs because it was user-friendly, with a familiar Windows layout

and an easy navigation structure. In assessing cost, some factors to consider are: cost per user; computer hardware capacity at local programs; yearly support fees and their impact on customization charges; data migration charges; and license fees. Due to the size of some programs in Texas–a few have up to 400 staff–it was important for each DV program to determine if they would pay a minimal user fee to access assistance or have no technical support. Based on the volume of programs, TCFV was able to negotiate a one-time license fee with the vendor, as well as no individual user fees. Yearly support fees were reasonable and were also locked in at a reduced amount, with modest increases per year allowing user programs to budget in advance.

Ease of Technical Assistance

Thinking through technical assistance delivery, and how readily available it would be through the software developer, was another critical factor. While TCFV planned to provide technical assistance to agencies, it was important to understand the size of their vendor's support staff as well. As a coalition with approximately 100 member agencies, a key factor was TCFV's need to have a software company that could provide support to thousands of users. This piece would likely be even more important if the state coalition did not have the capacity to provide additional technical assistance to supplement the tech support provided directly by the software developer. Additionally, TCFV considered the initial learning curve period and decided to contract with the vendor to provide a series of trainings prior to the state rollout. The trainings were provided in-person and as recordings, and are available as an ongoing reference for agencies.

Program Feedback

TCFV engaged their member agencies in a feedback process to inform their understanding of agency needs, as well as the customization requirements. The coalition reached out to agencies that represented the diversity of program types across the state to determine what programs needed in a client management system. These agencies served as the pilot group consulted on development of the database and considered data fields, funder requirements, design and organization of the database. The pilot program was particularly helpful because, in addition to advising on the creation of the system, participants often tested reports and served as peer mentors for other new users. The pilot program lasted approximately one year with members of the pilot program meeting frequently during this timeframe.

Rollout Process

The rollout process was a large-scale component of the overall project that required planning and frequent technical assistance, with illuminating lessons for others embarking on this process. At the time of the rollout, only one TCFV staff member provided consistent technical assistance to agencies using the new database. The individual had many responsibilities at the coalition in addition to the provision of TA on the comparable database. To address this gap in coalition staffing, TCFV created a position dedicated to supporting the system and providing technical assistance. The staff person also acted as a liaison between agencies and the vendor regarding technical issues. A full-time database administrator position was key in the success of the Comparable Database project rollout.

Issues to consider in rolling out a new statewide database:

- **Consider reporting deadlines.** When does the fiscal year began? Are all funders on the same one? This is crucial, as many funders count a survivor as new at the start of a fiscal year and rolling out software mid-year could cause issues with accuracy.
- **Consider how much time is needed for training.** A new database system requires significant time for staff responsible for data entry to learn the system. Agencies should be aware of need for ongoing training as well.
- **As an agency, are you asking all staff to enter data, or will it be just one person?** When all staff enter data the time burden is lower, but the training needs are higher to ensure all staff enter consistently. When one staff performs the data entry, that person may hold expertise on funder deliverables but entry can be very time consuming.
- **Keep the door open to feedback.** This is important so that agencies feel comfortable sharing the issues they are facing and the coalition can assess trends and issue-spot.

An additional consideration at the time of rollout was collecting HUD-specific information within the Comparable Database. At the time TCFV was customizing the database, all data fields and questions from the various HUD grant sources were interwoven. TCFV decided that some funding streams with more in-depth questions, such as the federal Runaway and Homeless Youth (RHY) funds, could be moved to a separate database tab because they did not need to be asked of most survivors. TCFV also put a security warning on the Social Security field to warn users of the sensitive nature of collecting that information that cannot be aggregated and is not used for any VSP federal funder reports, and to prompt a safety discussion with survivors. This warning is something TCFV deemed important to monitor closely, as some customizations by the database software developers have overwritten it, prompting TCFV to develop a resource to allow users to add it manually.

Confidentiality Safeguards

Victim service providers are obligated under state and federal laws to protect client information, which is why VSPs may not enter personally identifying information into HMIS. Thus, confidentiality safeguards are fundamental in choosing a database. TCFV supported agencies in meeting their confidentiality obligations while providing agencies with the technical assistance they needed by implementing the following strategies:

- **Coalition-held Test Database**
    - TCFV houses a test database that has the same layout and reporting functions as the databases used by Texas DV agencies. The test database allows TCFV to solve issues within the system without accessing agencies' databases. As a third party (according to VAWA) and to protect survivor confidentiality and safety, both TCFV and the software vendor do not have or need to access any local VSPs Comparable Database to provide technical assistance support.
    - TCFV enters sample data in the test database to use when addressing agency questions and testing new reports. This also allows TCFV to show the test database during trainings or when describing an issue without disclosing any personally identifying information.
- **De-identified Reports**
    - The reports that have been created within the Texas Comparable Database can pull de-identified data and/or only aggregate numbers, as tested by TCFV. This allows agencies to

run reports and use those numbers to report to funders or their board of directors while still complying with their FVPSA/VAWA/VOCA confidentiality requirements.

- **Remote Connection without Accessing Agency Data**
    - When an agency is unable to correct an issue by following written technical assistance, TCFV can connect with agencies remotely through a virtual computer sharing platform to guide users through the steps required to correct the issue. TCFV shares only their test database and allows agencies to follow along in their own database without any third parties, including TCFV, accessing any personally identifying client data.

What capacity is needed to effectively provide technical assistance to agencies using the supported database?

Coalition Capacity

To effectively provide technical assistance to agencies using the supported database, consider the following factors:

- **How much time will technical assistance require of coalition staff?**
    - Consider how many staff members will acquire expertise on the database and be able to provide technical assistance, as well as how much of their time will be allocated to database technical assistance. Determine how long it will take a staff member to be trained on the database and what level of expertise the coalition is looking for in this staff member.
    - Comparable Database administrators will also need to assess the level of technical assistance provided. Funder regulations, including how to complete specific data fields (definitions of services etc.) need to be answered by the coalition, not the vendor.
- **How much time will need to be spent on the creation of resources?**
    - As a coalition, determining how many resources you plan to create and provide to agencies will be crucial in determining the capacity of your agency to provide database support. TCFV has found that the creation of support resources, which is discussed in more detail below, saves staff time, specifically with frequently asked questions or common issues. Offering resources can foster a connection with those who enter data and provides advocates the resources they need to do their jobs.
- **How much time will need to be spent coordinating or collaborating with the vendor?**
    - The coalition must consider the level of customization its programs require – which is based on the programs' various funding sources and other factors. TCFV decided to customize the database so all programs can capture data measures for all the state and federal sources from which most agencies receive funds, beyond the HUD CoC or ESG funds requiring a Comparable Database. When a funder changes its requirements, TCFV must assess the changes, provide the vendor with a request to change the collecting and reporting mechanisms, and manage the rollout of the changes to all agencies using the database. This can be a very intensive and time-consuming task for the coalition.
    - Additionally, when HUD reporting changes occur, TCFV stays in communication with the software developer to ensure that updates are completed quickly. When purchasing a Comparable Database for HUD reports specifically, make sure the software developer is on the monthly HUD database vendor calls, during which vendors are notified of any HUD reporting updates.

Creating Data Communities

TCFV found that creating a data community with agencies that use the Comparable Database was helpful for many reasons. A listserv allows agencies to crowdsource answers to questions that many of the programs faced, recognize larger scale issues as they arose, and help TCFV identify what resources would be the most useful to agencies using the Comparable Database. The data community provided support to advocates who often have challenging, high-pressure jobs. Once the community was created, TCFV furthered communication by implementing the following approaches when creating resources:

- **Office Hours**
  - TCFV offered virtual sessions to speak one-on-one or in a group about any issues related to the system. One-on-one sessions, offered on a sign-up basis, promoted a vital space for readily available technical assistance. Group office hours allowed for peer sharing and support.
- **Yearly Scan Calls**
  - Before making yearly updates to the system, TCFV hosts feedback calls open to all users. Agency staff can provide feedback, surface areas of concern/confusion, and make specific requests for improvements.
- **Varied Resource Mediums**
  - To support varied learning styles, TCFV has created resources in many different mediums including:
    - Tip Graphics
    - You Asked, We Answered conversation series
    - Texas Database Manual
    - Service Glossary
    - Instruction Documents with Screenshots
    - Webisodes (short, static, step-by-step videos)
    - Webinars
- **New and Up-To-Date Resources**
  - TCFV has been committed to creating new resources on an ongoing basis focused on the emerging needs of Texas agencies. The resources are provided to agencies through the Texas Data Connection listserv and housed on the TCFV.org website.
- **Timely Resource Creation**
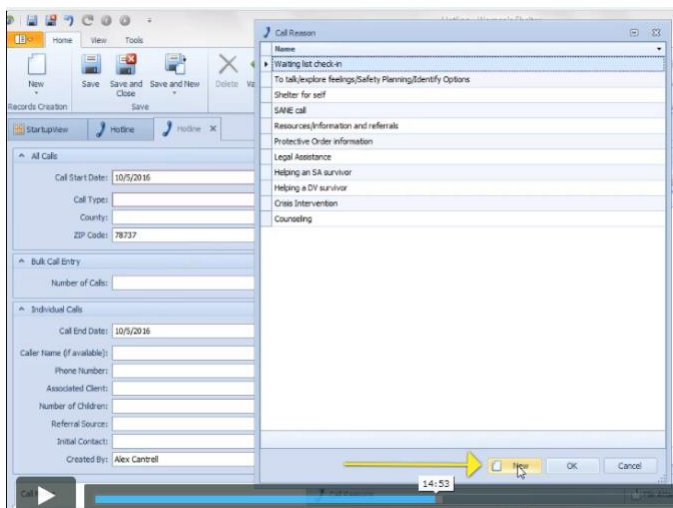
o   There have been times when complicated guidance is needed by many agencies all at once. When that happens, TCFV creates a resource in a timely manner so that there is as minimal impact as possible.

Need technical assistance? Please contact Debbie Fox of NNEDV at dfox@nnedv.org or Laura Chaath of Collaborative Solutions, Inc., at laura@collaborative-solutions.net for further guidance. You can also contact Alexandra Cantrell directly at the Texas Council on Family Violence at acantrell@tcfv.org to learn more about their Comparable Database statewide implementation and coordination efforts. You can contact NNEDV's Safety Net Team at safetynet@nnedv.org for information on VAWA/FVPSA/VOCA confidentiality requirements and what factors to consider when selecting a Comparable Database.

ADDITIONAL RESOURCES & FURTHER READING:

TechSafety.org, "Selecting a Database"

HUD Exchange, "2017 HMIS Data Standards"

HUD Exchange, "Are records contained in HMIS or a comparable database used by victim services or legal services providers acceptable evidence of third-party documentation?"

The National Network to End Domestic Violence (NNEDV), a social change organization, is dedicated to creating a social, political and economic environment in which violence against women no longer exists.
http://www.nnedv.org

The Texas Council on Family Violence promotes safe and healthy relationships by supporting service providers, facilitating strategic prevention efforts, and creating opportunities for freedom from domestic violence.
https://tcfv.org/

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Domestic Violence and Housing Technical Assistance Consortium

The Consortium, launched in 2015, provides training, technical assistance, and resource development at the critical intersection between domestic violence/sexual assault services and homeless services/housing. Funded by a partnership between the U.S. Department of Justice, the Department of Health and Human Services, and the Department of Housing and Urban Development. This multi-year Consortium supports a collaborative TA Team that includes the National Alliance for Safe Housing (a project of the District Alliance for Safe Housing), the National Network to End Domestic Violence, the National Resource Center on Domestic Violence, and Collaborative Solutions, Inc., to build and strengthen technical assistance to both housing/homelessness providers and domestic violence/sexual assault service providers. The Consortium aims to improve policies, identify promising practices, and strengthen collaborations necessary to enhance safe and supportive housing options for sexual and domestic violence survivors and their children.

More Questions? The Consortium TA Team is available to provide individualized TA and training to communities interested in expanding the array of safe housing options for domestic and sexual violence survivors. We can also provide support to domestic violence and sexual assault advocates, homelessness and housing providers, and other allied partners interested in building stronger community collaborations.

Visit **SafeHousingPartnerships.org** to access a comprehensive collection of online resources and to request technical assistance and support.