

Data access and release policy

Date approved: March 21, 2019

Background

The River Valleys CoC desires that CoC partners and the public have access to a range of useful data about homelessness in our CoC region. Making data available provides transparency in CoC operations and decision-making and supports cooperative planning between the CoC and the agencies, communities, and local governments in the CoC region in our efforts to prevent and end homelessness. The CoC is also committed to applying a common data access and release policy supported by streamlined processes across the CoC to ensure that participant data privacy is respected and that staff workload is managed effectively.

The policy objectives are:

- Public benefit from increased data use
- Timely and fair access to information
- Relevant information release
- Individual privacy protection
- Efficient processes for approval, extraction and release of allowed data

This policy recognizes that some data held by the CoC has been provided by individuals for the purpose of application to housing or services programs. As such those individuals have a right to trust the CoC to keep their personal information safe, secure and private. The requirement to maintain security and privacy is codified in legislation and confirmed within Homeless Management Information System policies.

Policy

The policy of the River Valleys Continuum of Care (MN-502) is to make its data available to the public to an extent that facilitates informed community planning to prevent and end homelessness within the CoC region.

The scope of this policy is overall CoC system data, such as community needs data and surveys, system performance and outcomes, and CoC participation information. This policy does not apply to data of individuals served, operational data of individual projects/programs within the CoC, or to data used for administration or operation of the CoC, such as human resources data or financial data. In no circumstance will data be released in a way that may allow for identification of individuals or households to be identified.

In general, the CoC prioritizes release of standard sets of data for community use. Other requests for data will be assessed on a case by case basis and will be prioritized for release depending on the capacity of CoC staff and anticipated benefit from the release to the CoC, its members, and persons served.

Parties accessing standard data releases or requesting and/or receiving other data from the CoC must recognize their continued accountability for the data released and establish adequate controls over the use of personal or other sensitive data to permit the use of CoC data in research projects, as well as community/agency program planning.

Standard releases of CoC data

The CoC maintains various data on the homeless system in the River Valleys CoC Region. These data types are listed below. The CoC will release the following data and post it on the CoC website according to the

frequency requirements listed below. These data releases should be sufficient to meet most data needs of CoC members and partners.

Table 1: Standard CoC data publications

Name of Data	Description	Type	Frequency updated	Years/ dates available
Point in Time (PIT) Count	Report submitted to HUD by the CoC. Includes counts by household type as well as basic demographics.	Aggregate report only	Annually	All available
Housing Inventory Chart (HIC)	Chart submitted to HUD by the CoC. Includes shelter, transitional housing, rapid rehousing, and permanent supportive housing operating in the CoC region as of the PIT Count date.	List	Annually	Most recent 5 years, starting in 2016
HUD System Performance Measures (SPMs)	Report submitted to HUD by the CoC. Includes aggregate outcomes in the CoC toward performance measures defined by HUD.	Aggregate report	Annually	Most recent 5 years, starting in 2016
Longitudinal Systems Analysis (LSA), formerly the Annual Homeless Assessment Report (AHAR)	Report about how people experiencing homelessness use their system of care, submitted to HUD by the CoC as part of a national report to the U.S. Congress.	Aggregate report	Annually	LSA: Most recent 5 years, starting 2018 forward AHAR: 2014-2017
Coordinated Entry System (CES) outcome reports	Summary report on referrals, move-ins, and denials for housing that is designated for homeless individuals and families.	Aggregate report	Quarterly	Most recent 2 years, from 2019 forward
CoC membership	Names of agencies and individuals participating in CoC meetings (no contact information)	List	Annually	Previous year only
CoC Key contacts	Names of CoC officers and staff, with contact information	List	Annually, or as needed	Current only
Project applications approved and unapproved for inclusion in the HUD CoC National Competition Application	Annual list produced by the CoC, with names of projects, project types, applicant name(s), and funding requests approved by CoC membership to be submitted to HUD for funding.	List	Annually	Most recent 5 years, starting in 2016
List of projects awarded funds through the HUD CoC National Competition	Annual list produced by HUD, with names of projects, project types, and funding awards approved by HUD for funding.	List	Annually	Most recent 5 years, starting in 2016
CoC Needs/Gaps Analysis	Summary of data from community surveys and from other sources used for CoC discussion and prioritization of new projects	Summary report	Biennially	Current only
Other standard reports as available		TBD	TBD	TBD

Other releases and publication of CoC data

In general, the CoC prioritizes release of standard sets of data for community use. Publication of other CoC data may be completed if additional standard reports are available in future years and if the CoC Executive Committee determines it is valuable to publish on one-time or ongoing basis.

Other requests for data will be assessed on a case by case basis and will be prioritized for release depending on the capacity of CoC staff and anticipated benefit from the release to the CoC, its members, and persons served. In many cases, these requests are for smaller geographic areas (subsets of the CoC geography), specific program types, or target populations. The CoC considers these special data releases.

Allowed purposes for special data releases

Because special data releases demand additional time from CoC staff, special data releases must provide value to the CoC, its members, and/or its partners in preventing and ending homelessness. As such, special data releases are prioritized in this order:

- 1) Need and/or inventory data for jurisdictions conducting consolidated planning within the River Valleys CoC geographic region
- 2) Need and/or inventory data for public housing agencies and/or housing authorities conducting regular planning within the River Valleys CoC geographic region
- 3) Need and/or inventory data for agencies applying for funding for homeless housing or services within the River Valleys CoC geographic region
- 4) Need and/or inventory data for agencies conducting community information or advocacy campaigns within the River Valleys CoC geographic region
- 5) Other data requests not covered by the priorities listed above, so long as the release provides value to the CoC, its members, persons served, and/or its partners in preventing and ending homelessness.

Limitations on special data releases

Data releases may be limited based on level of detail, geographic specificity, or time required to produce and deliver data. These limitations apply to both standard data publications and special data releases.

- Level of detail: Data held by the CoC will be released publicly in an appropriately de-identified and confidentialized formats unless there are compelling and legally allowed reasons to the contrary. In addition, data that is specific to a single program or project will not be released without the permission of an authorized representative of the program or project (as defined by the individual organization/agency). Further precautions will be applied in cases where individuals and programs are covered by the Violence Against Women Act or other federal/state protections.
- Geographic specificity: Because of current database limitations, data released for specific geographies shall generally be limited to the county-level or larger geographic areas, and in some cases, geographic specificity may not be attained. Use of larger geographic areas may also be required when small datasets may inadvertently lead to identification of individuals/households or specific programs.
- Time required: Special data releases that require large datasets, multiyear datasets, and geographically limited datasets may require substantial time to generate and release. Given staff capacity for special data releases, requests with short deadlines may not be fulfilled.

Making a request for special data release

Requests for special data releases must be directed in writing to the CoC Coordinator via the Data Request form linked from the CoC webpage. The form will require information on the requestor, reason for the request, type of data requested, timelines for use of data, and other pertinent details identified by CoC staff. A sample form is attached as an addendum to this policy, but may be revised as necessary to implement the policy.

Requests will be reviewed weekly, and at that time, an estimate of time for data to be released will be provided OR additional information will be requested. Requestors are advised to request data as early as possible to allow for adequate time for securing and releasing data. Requests that fall into priority #5 above or that cannot otherwise be categorized into a clear priority area will be reviewed for approval by a subset of the CoC's Data and Technical Assistance Committee. All others will be reviewed for approval by CoC staff.

In all cases, parties requesting and/or receiving other data from the CoC must recognize their continued accountability for the data released and establish adequate controls over the use of personal or other sensitive data to permit the use of CoC data in research projects, as well as community/agency program planning.

River Valleys CoC complies with all policies that govern data in Minnesota's Homeless Management Information System (HMIS). Research uses and publication of HMIS data are governed by HMIS policies, including Minnesota's HMIS Data Privacy Notice, Minnesota's HMIS Release of Information, Agency Agreements, Local HMIS Data Use and Administration Agreements (LSA Agreements), and Business Associate Agreements. <https://hmismn.org>

Agencies and programs with access to HMIS should first pursue their own agency's reporting capabilities in HMIS before requesting special data releases.

Addendum A: Sample Data Request Form Elements

Requestor information

- Name
- Agency
- Taskforce/workgroup (if applicable)
- Email address
- Phone number
- CoC affiliation
- Does your agency currently use Minnesota's HMIS?

Request description

- Is the data request for a specific grant or funding opportunity? Please specify
- Grant application due date
- Requested data delivery date
- Type of Request – Report enhancement, Custom report

If a report feature enhancement request

- To what existing report is this request related?
- Describe the idea/feature enhancement request
- How will you use the report feature enhancement?
- How do you envision this feature enhancement to look?

If a custom report request

- For what purpose will the report be used?
- What program types, geographies, or time periods should be included in the report?
- Data elements or assessment questions to include?
- How do you envision this feature enhancement to look?
- Any other details to be included in the report