



Data Collection About People Experiencing Homelessness

**Report to Congress From
the U.S. Interagency Council on Homelessness**

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Introduction

The United States Interagency Council on Homelessness (USICH) has prepared this report in response to the House and Senate Appropriations Committees in the Division L Joint Explanatory Statement accompanying P.L. 116-260, the Consolidated Appropriations Act of 2022, which gave the following directive:

“USICH to submit to the House and Senate Committees on Appropriations within 270 days of enactment of this act a report identifying the homeless data collection systems being used by the member agencies of USICH, including identification of which systems interact with, or are accessible by, multiple agencies.”

Background

Since the implementation of *Opening Doors*, the 2015 federal strategic plan on homelessness, federal partners have worked strategically to align data collection systems and increase data integration into the U.S. Department of Housing and Urban Development’s (HUD) prescribed Homeless Management Information System (HMIS). The coordinated efforts spurred by the plan’s implementation have resulted in increased data accessibility across systems. Nonetheless, as documented in this report, some key homeless services databases operate independently of HMIS and do not share real-time data with the system.

Collecting Data on Homelessness

To address this directive, USICH focused its analysis on HMIS, the primary data system used by communities to collect information about people experiencing homelessness. USICH reviewed ways other federal programs that collect data on people experiencing homelessness may or may not interface with HMIS. The following analysis of data accessibility begins with a general discussion of the various purposes of data collection, noting where advances have been made in interoperability (i.e., the ability of two or more data systems to exchange information and to use the information once it is received). Lastly, USICH recommends improving data sharing to serve people experiencing homelessness more efficiently.

Definitions of Homelessness

Most programs targeted to people experiencing homelessness rely on one of three definitions used by three different federal agencies: HUD, the Department of Education (ED), the Department of Health and Human Services (HHS).ⁱⁱⁱ Each definition requires the collection of data elements that play a role in establishing eligibility for program benefits. These elements have [varying degrees of overlap](#)¹ but are not the same.

Individual-Level Data vs. System-Level Data

Data about people experiencing homelessness is collected for different purposes and used by multiple audiences. Examples include:

- Data that shapes service provision

ⁱⁱⁱ Definitions of homelessness within federal statutes and programs are provided in Appendix A.

- Data that is deidentified, aggregated, and used to demonstrate overall system effectiveness.
- Data that informs strategic resource allocation based on the outcomes of the people served and/or program type.

Homelessness Data Systems

HUD's HMIS and the Department of Veteran Affairs' (VA) Homeless Operations Management and Evaluation System (HOMES) collect identifiable client-level data used primarily for client management and are aggregated to complete outcome reports. Other systems, like ED Facts, collect unduplicated, de-identified individual-level data, like students enrolled in public schools in grades PK-12, to generate an aggregate picture of homelessness. Information collected during Point-in-Time Counts (PIT) involves individual-level data without identifiers. The data is then rolled up into an aggregated community report used to better understand the characteristics of the population experiencing homelessness on a single night and trends over time. However, some communities use the data collection events (e.g., PIT Counts) to identify people who were not known to service providers and to make service connections. Since data collection tools have different purposes, this report focuses on examining where data sharing can be most impactful in facilitating access to services for individuals experiencing homelessness.

Homelessness Data Sources

HMIS

HUD operates substantial assistance programs for people experiencing homelessness through its various [Homeless Assistance Programs](#).² Each program included under the Homeless Assistance Program requires grantees--state and local governments and non-profit organizations--to enter data about the people the program served into a local HMIS system. HMIS is a community-based application that collects and reports on the characteristics and needs of people served by programs designed to prevent and end homelessness in a particular geographic area or Continuum of Care (CoC). HUD requires CoCs to enter data into their local HMIS, and these data, in turn, support the provision of client services and annual community data reporting. Communities share their aggregated data with HUD, and HUD uses the data to develop the Annual Homeless Assessment Report (AHAR). The AHAR is HUD's report to Congress that provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless individuals and service use patterns. HMIS serves as the data collection repository for all HUD Homelessness Assistance Programs. It is the designated data system for other non-HUD-administered programs that serve people experiencing homelessness.

The specific data points collected in HMIS are determined through a collaborative process. HUD partners with federal agencies to develop the HMIS data standards, and the agency serves as the lead for creating products and resources for HMIS. Table 1 details the federal programs that require data entry into HMIS.

Table 1: Programs That Require Data Entry Into HMIS

Homeless Management Information System (HMIS)	
Federal Agency Governing Data Collection	<ul style="list-style-type: none"> • HUD
Programs Entering Data in HMIS	<ul style="list-style-type: none"> • All HUD Homeless Assistance Programs, including CoC and Emergency Solutions Grants (ESG) • Substance Abuse and Mental Health Services Administration's (SAMSHA) Projects for Assistance in Transition from Homelessness (PATH) • HUD Housing Opportunities for Persons With AIDS (HOPWA) • HHS Runaway and Homeless Youth
VA Programs Entering Data in HMIS³	<ul style="list-style-type: none"> • HUD-VA Supportive Housing (HUD-VASH) (optional)^{iv} • Grant and Per Diem (GPD) providers • Health Care for Homeless Veterans (HCHV) Contract Emergency Residential Housing • Healthcare for Homeless Veterans Community Contract Safe Haven (HCHV: Low Demand Safe Haven) • Supportive Services for Veterans Families (SSVF)⁴

Homelessness Programs and Homeless Operations Management and Evaluation System (HOMES)

VA uses the Homeless Operations Management and Evaluation System (HOMES) to collect data on homeless veterans as they move through the VA's system of care. While HOMES is the VA's primary data collection system, VA also uses HMIS to streamline data collection processes and facilitate communication between VA homeless program staff and leadership on the local, regional, and national levels. HUD-VASH staff enter data into the VA's HOMES database; however, there is optional entry into HMIS for some HUD-VASH programs.

Any HUD-VASH use of HMIS is voluntary. Some HUD-VASH Other Than Honorable (OTH) projects, called "HUD-VASH Continuum," have been in operation since Fiscal Year 2018 and are unable to use HOMES and therefore participate in HMIS for data collection purposes. For these programs, VA Medical Centers (VAMC) [share](#)⁵ data with HMIS administrators for upload into HMIS, or staff directly enter data into HMIS.

^{iv} HUD-VASH is a HUD and VA program that is jointly administered by HUD and VA. It is included in this report under VA because VA is responsible for data collection.

Data on Persons Fleeing Domestic Violence (DV)

While great strides have been made to increase access to services for victims of domestic violence in local homeless services systems, it is important to acknowledge that the Violence Against Women Act (VAWA) prohibits victim service providers from entering client information into HMIS. Victim services providers, instead, must enter program participant information into a separate database where data are aggregated and provided to local CoCs. All comparable databases used by DV providers must include the same data elements as HMIS.^v The Domestic Violence Homelessness Technical Assistance Consortium (DVHTAC),⁶ which includes members from multiple federal agencies, continues to identify ways to increase information sharing between victim service providers and other homeless service providers within the bounds of the VAWA protections.

Data on School-Aged Children Served Under McKinney-Vento Education

Schools serving children who meet the McKinney-Vento definition of homelessness, as defined by the U.S. Department of Education, include individual counts of homeless children and youth by a data element (e.g., age/grade, demographic subgroup, primary nighttime residence). Still, none of these elements or counts are linked to personally identifiable information. Data collection begins at the school and district or Local Education Agency (LEA) level. Each LEA has a local liaison for homeless education responsible for identifying homeless students through coordinated activities with other school personnel and community agencies. School administrators report student data, which includes flags for children and youth experiencing homelessness (including those living in doubled-up situations and hotels or motels if they are there because of a lack of alternate, adequate accommodations).^{vi} Student data are aggregated by state departments of education by LEA, unduplicated at the state level and reported to ED at the state, LEA, and sometimes schools. Unlike data collected in HMIS, aggregated ED data does not include personally identifying student information, since the primary purpose is reporting at the program level. Schools collect data throughout the school year through the student enrollment/registration process. As a [student's living situation becomes known to school district staff](#), data systems cannot share this information since it is part of the student's academic file and protected under the Federal Education Rights and Privacy Act (FERPA). Most state departments of education operate electronic student data management systems whereby school district counts of eligible students served by programs for state and Federal reporting purposes can be extracted, aggregated, and programmed for file submission. However, Federal agency staff do not have access to individual student-level information.

HUD's Point-In-Time (PIT) Count

Through HUD's annual PIT count, communities count the number of people experiencing unsheltered or sheltered homelessness on one night in late January. PIT data, which is reported by CoCs, establishes estimates of the number of people experiencing homelessness within a geographic region and the scale of the need for homelessness services and housing. It is important to note that PIT data is intended to provide a snapshot of homelessness at a single point in time and should be supplemented by annual data that communities can use to understand further the full scope of homelessness in their communities over a year. Nevertheless, community PIT counts may include information about individuals who are unsheltered and not documented in the local HMIS. This paper does not address the strengths and limitations of PIT methodology. Still, it acknowledges that PIT data

^v <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

^{vi} Individuals and families living in doubled-up situations and in self-paid hotels and motels are not considered homeless under the HUD homeless definition.

is an important component of community efforts to collect data on individuals experiencing homelessness.

Data Systems and Interoperability

For the purposes of this report, USICH defines interoperability as the ability of two or more data systems to exchange and use information. While HUD created data standards for HMIS in 2004, the standards have undergone multiple updates. Over time, there has been increased collaboration to address interoperability concerns by working to shift data systems outside of the homeless services system toward integration into [HMIS](#).⁷ In 2015, *Opening Doors: the Federal Strategic Plan to Prevent and End Homelessness* elevated this goal, resulting in coordination between HUD, HHS, the VA, and other federal partners to update the [HMIS data standards](#)⁸ and standardize data collection on homeless individuals and families across systems as much as possible.

The following are examples of progress made toward increasing program data sharing and system interoperability:

- In the past, the Runaway and Homeless Youth Program (RHY) collected data in a separate client management system called RHY-HMIS. Beginning in 2015, RHY grantees began [entering](#)⁹ data on all youth served in the respective CoCs HMIS application.
- Another effort of note is HUD and VA cooperation in allowing VAMCs to provide client-level HUD-VASH data from HOMES to local CoCs to import into the local HMIS systems. This bi-directional data sharing [began in 2020](#).¹⁰

Recommendations for Increasing Access Through Data Sharing

While the advances in interoperability between HMIS and other programs demonstrate a strong federal commitment to improving administrative efficiency, additional opportunities exist to improve data collection and utilization and help people experiencing a housing crisis connect with multiple programs.

Strategies to advance data-sharing, accessibility, and interoperability include:

- Explore strategies to collect student data by partnering with ED, state educational agencies, and local educational agencies to explore opportunities for ensuring that eligible children and youth experiencing homelessness are identified in local HMIS data systems. If families with school-aged children are served by HUD-funded housing assistance programs or HMIS-participating shelters/housing providers, their information would already be included in the local HMIS. Nonetheless, there is the possibility that households receiving McKinney-Vento services may not be served in the local homelessness system and, therefore, would not be captured in HMIS. This is an opportunity to encourage community collaboration on data sharing between local continuums and local educational agencies.^{vii}

^{vii} The US Department of Education has an interagency data disclosure tip sheet on the McKinney-Vento program website that highlights different ways that LEAs and CoC's have coordinated to share data on students experiencing homelessness. See <https://oese.ed.gov/files/2021/05/ehcy-interagency-data-disclosure.pdf>. The National Center for Homeless Education has spotlighted several LEAs that coordinate with CoC's on PIT counts and other interagency data-related activities at

- *Explore opportunities to increase access to homeless services by coordinating data sharing with mainstream programs that may assist households experiencing homelessness.* While there have been gains in the integration across federal programs, opportunities for further data sharing, especially among mainstream programs and homeless data collection systems, continue to exist. While this report does not address data collection beyond homeless data collection systems, USICH supports opportunities to use mainstream programs (e.g., Temporary Assistance for Needy Families, Supplemental Nutrition Assistance Program, Medicaid) to identify individuals and households experiencing or at risk of homelessness and to link these households with mainstream programs and income supports.
- *Explore opportunities to increase access to homeless services through coordinating data sharing with population-specific service programs.* The Status Query and Response Exchange System (SQUARES) program is a VA web application that provides VA employees and external homeless service organizations with a way to validate Veteran status and eligibility for homeless programs by using limited sharing of identifying information. The method the systems use to cross-check identifying information may offer an example of how other population-specific programs can offer real-time validation through limited data sharing. USICH supports exploring additional opportunities to share real-time information to increase service provision efficiencies.

Conclusion

USICH's federal strategic plan—[All In](#)—released in December 2022, emphasizes the importance of using data and evidence to make decisions. Key strategies include actions to strengthen federal, state, and local capacity to collect, use, and share data. USICH looks forward to supporting federal partnerships to further data-sharing and coordination.

Appendix: Federal Definitions of Homelessness

Department of Housing and Urban Development (HUD)

HUD [defines](#)¹¹ homelessness for their programming into four categories. The categories are:

Category 1: Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
- (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence provided that:

- (i) Residence will be lost within 14 days of the date of application for homeless assistance;
- (ii) No subsequent residence has been identified; and

- (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (i) Are defined as homeless under the other listed federal statutes;
- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- (iii) Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
- (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

- (i) Is fleeing or attempting to flee their housing or the place they are staying because of domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence that has taken place in the house or has made them afraid to return to the house, including:
 - Trading sex for housing
 - Trafficking
 - Physical abuse
 - Violence (or perceived threat of violence) because of the youth’s sexual orientation;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks to obtain other permanent housing.

U.S. Department of Education (ED)

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11434a(2)) [defines](#)¹² homeless children and youth experiencing homelessness as A) individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 11302(a)(1) of this title); and B) includes

- i. Children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of adequate alternative accommodations; are living in emergency or transitional shelters; are abandoned in hospitals, or are awaiting foster care placement;
- ii. Children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as regular sleeping accommodation for human beings (within the meaning of section 11302(a)(2)(C) of this title);
- iii. Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- iv. Migratory children (as such term is defined in section 6399 of title 20) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act defines ‘unaccompanied youth’ as a youth not in the physical custody of a parent or guardian (42 U.S.C. § 11434a(6)).

Department of Health and Human Services (HHS)

Runaway and Homeless Youth Act

The Runaway and Homeless Youth Act (RHYA) (42 U.S.C. §5732a) [defines](#)¹³ homeless youth as individuals who are “less than 21 years of age ... for whom it is not possible to live in a safe environment with a relative and who have no other safe alternative living arrangement.” This definition, used for the Basic Center and Transitional Living programs, includes only those youth who are unaccompanied by families or caregivers. Additionally,

- For the **Basic Center Program**, a homeless youth is an individual who is less than 18 years of age or is less than a higher maximum age if the state where the center is located has an applicable state or local law (including a regulation) that permits such higher maximum age in compliance with licensure requirements for child-and youth-serving facilities.
- The Transitional Living Program defines the age as 16-21 or 22 years of age if previously in care under certain circumstances.

In addition, the **Basic Center Program** serves the following:

- Runaway Youth: An individual who is less than 18 years of age and who absents themselves from home or a place of legal residence without the permission of a parent or legal guardian, and
- Youth at Risk of Separation from the Family: An individual— (A) who is less than 18 years of age; and (B) (i) who has a history of running away from the family of such individual; (ii) whose parent, guardian, or custodian is not willing to provide for the basic needs of such individual; or (iii) who is at risk of entering the child welfare system or juvenile justice system as a result of the lack of services available to the family to meet such needs.

The **Street Outreach Program** also uses the following definition of ‘street youth’: An individual who— (A) is— (i) a runaway youth; or (ii) indefinitely or intermittently a homeless youth; and (B) spends a significant amount of time on the street or in other areas that increase the risk to such youth for sexual abuse, sexual exploitation, prostitution, or drug abuse.

Public Health Services Act

Section 254(b) of the Public Health Services Act established requirements for health centers. Part of these requirements includes serving people experiencing homelessness who [meet](#)¹⁴ the following definitions:

Homeless individual: The term "homeless individual" means an individual who lacks housing (without regard to whether the individual is a member of a family), including an individual whose primary residence during the night is a supervised public or private facility that provides temporary living accommodations and an individual who is a resident in transitional housing.

The Act allows health centers to continue providing care to formerly homeless individuals in permanent housing for up to 12 additional months.

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- 1 Mosites, Emily, et al. "Data Sources That Enumerate People Experiencing Homelessness in the United States: Opportunities and Challenges for Epidemiologic Research." *American Journal of Epidemiology*, vol. 190, no. 11, Nov. 2021, <https://doi.org/https://doi.org/10.1093/aje/kwab051>.
 - 2 "Homelessness Assistance Programs." U.S. Department of Housing & Urban Development, <https://www.hudexchange.info/homelessness-assistance/>.
 - 3 "VA Programs HMIS Manual." U.S. Department of Housing and Urban Development, Sept. 2021, <https://files.hudexchange.info/resources/documents/VA-Programs-HMIS-Manual.pdf>.
 - 4 "HUD-VASH Data from HOMES to Be Provided to CoCs." U.S. Department of Housing and Urban Development, 20 Dec. 2019, <https://www.hudexchange.info/news/hud-vash-data-from-homes-made-available-to-vamcs/>.
 - 5 LaSalle, Jones Lang. "Homeless Operations Management and Evaluation System (HOMES) User Manual – Phase 1." ADL Data Systems, 19 Apr. 2011, <https://www.adldata.org/>.
 - 6 "About the Consortium." About the Domestic Violence and Housing Technical Assistance Consortium, <https://safehousingpartnerships.org/about>.
 - 7 "Federal Partner Participation." U.S. Department of Housing and Urban Development, <https://www.hudexchange.info/programs/hmis/federal-partner-participation/>.
 - 8 "HMIS Data Standards." U.S. Department of Housing and Urban Development, Dec. 2021, <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>.
 - 9 "RHY–HMIS." Runaway and Homeless Youth Training & Technical Assistance Center, <https://www.rhyttac.net/rhy-hmis>.
 - 10 "HUD-VASH Data from HOMES to Be Provided to CoCs." U.S. Department of Housing and Urban Development, 20 Dec. 2019, <https://www.hudexchange.info/news/hud-vash-data-from-homes-made-available-to-vamcs/>.
 - 11 "Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH): Defining Homeless Final Rule." U.S. Department of Housing and Urban Development, Nov. 2011, <https://www.hudexchange.info/resource/1928/earth-defining-homeless-final-rule/>.
 - 12 "McKinney-Vento Definition." National Center for Homeless Education, <https://nche.ed.gov/mckinney-vento-definition/>.
 - 13 "Runaway and Homeless Youth Program Authorizing Legislation." The Administration for Children and Families, 31 May 2018, <https://www.acf.hhs.gov/fysb/law-regulation/runaway-and-homeless-youth-program-authorizing-legislation>.
 - 14 "42 U.S. Code § 254B - Health Centers." Cornell Law School Legal Information Institute, <https://www.law.cornell.edu/uscode/text/42/254b>.