Exposure Draft
Proposed Standard for Public Good Accounting and Reporting on HMIS Case Note Documentation

This Exposure Draft of a proposed Measurement Standard is issued by the Public Regional Outcomes Standards Board for public comment.

Written comments should be addressed to

Research and Technical Director
Serial Reference ED-005

Issued: 27 October 2022
Comment Deadline: 10 November 2022
Notice to Recipients of This Exposure Draft of a Proposed Measurement Standard.

The Board invites comments on all matters in this Exposure Draft until 10 November 2022. Interested parties may submit comments in one of three ways:

• Using the electronic feedback form available on the PROS Board website at Exposure Documents Open for Comment
• Emailing comments to sdprosboard@sdcta.org, Serial Reference No. ED-005
• Sending a letter to “Research and Technical Director, Serial Reference ED-005, San Diego Public Regional Outcomes Standards Board, San Diego Taxpayers Educational Foundation, 2508 Historic Decatur Road, San Diego, CA 92106.”

All comments received are part of the PROS Board’s public file and are available at www.sdcta.org/sdprosboard.

If you require an extension to the two-week public comment period, please make a formal request by Thursday, November 3rd through the channels outlined in the exposure drafts. If the PROS Board receives a high volume of extension requests, it may opt to extend the public comment period.
Purpose of Exposure Draft

The purpose of this Exposure Draft is to disclose the scope, area, and function of a regional standard on 
*HMIS Case Note Documentation* in homelessness service provision.

This draft is dually intended to inform the public, members of the Public Regional Outcomes Standards 
Board (PROS Board), PROS Board Working Group participants, and all other regional stakeholders in the 
achievement and reporting of successful outcomes in public services on the due processes of the PROS 
Board and its working groups which culminated in this proposed standard and document. The purpose 
and intention of the PROS Board itself is to facilitate a collaborative and consensus-based approach to 
determining regional standards on the reporting of outcomes and data in public services.

This document and the proposed standards contained herein are the results of this collaborative and 
consensus-based approach, with community-wide participation, including those members of privately and 
publicly funded organizations as well as persons with lived experience which took part in our working 
group discussions on homelessness, or those members of the public and/or stakeholders who 
communicated their thoughts and experience.

This proposed standard on *HMIS Case Note Documentation* recognizes that case notes on clients in HMIS 
are a free-form text field and the completion and subsequent usage of this field varies widely across the 
San Diego region. This standard attempts to create consistency to enhance the utility of the information 
potentially recordable and sharable in this field.

This document covers all necessary related aspects of this proposed standard, including purposes, scope, 
and expectations on Case Note Documentation. The appendices provide background information 
regarding the needs for standards, as well as case examples of standard implementation.
# Table of Contents

## Objective

| Intended Regional Effects of Issuing This Standard | 5 |
| Other Regional Purposes Outside the Focus of This Standard | 5 |

## Standards of Public Good Accounting and Reporting

| Scope and Scope Exceptions | 6 |
| Organizations | 6 |
| Key Terms | 6 |
| Recognition – Initial and Subsequent Measurement | 6 |
| Special Note on Organizations with Limited Resources | 7 |
| Presentation on Performance or Financial Reports | 7 |
| Disclosure Requirements | 8 |

## Effective Date and Transition

| 8 |

## Appendix A:

| Background Information | 8 |
| Information on CSTAR | 8 |
| Basis for Conclusions | 8 |
| Varying Practices in Case Notes | 8 |
| Information Useful to a Service Provider | 9 |
| Alternative Views and Risk Areas That May Need Addressing in Future Revisions | 9 |

## Appendix B

| Example Specific Applications of This Standard | 9 |
| Publicly-Funded Service Provider | 9 |
| Notes to Help Readers of Performance or Financial Reports Following This Standard | 9 |
| Potential Investors in a Service Provider | 9 |
| A Service Provider with Heavy Referrals from Another Service Provider | 9 |
Objective

The PROS Board issues these standards on HMIS Case Note Documentation within homelessness service provision in the San Diego region to increase the likelihood an individual experiencing homelessness will end their homelessness permanently and as efficiently as possible. This standard provides the measurement and reporting requirements that assist stakeholders in identifying organizations who share case notes that are actionable by preventing retraumatization of individuals experiencing homelessness and increasing the likelihood of the successful attainment of an individual’s goals in ending their homelessness.

Intended Regional Effects of Issuing This Standard

Service providers that demonstrate compliance with this standard can assure funders they are substantively sharing actionable case note information with the network of service providers. In other words, through this standard a provider can demonstrate it sets up a potential future provider, who may even be a competitor, with information that could streamline this future provider’s services on behalf of the client.

Acknowledging that case notes will never be perfect and that data entry is a human-driven process, this standard creates transparency around an organization’s case note assurance practices so that funders and partner organizations can have reasonable assurance that the election to contribute to case notes pursuant to this standard is being done reasonably well and not haphazardly.

Through broad compliance with this standard, service providers should be able to minimize and potentially prevent the retraumatization of individuals experiencing homelessness, while also increasing the chances of their clients’ successes. Essentially, this standard creates a requirement to document “lessons learned” on engagement with individuals experiencing homelessness so that engagement errors or challenges are less likely to recur.

Other Regional Purposes Outside the Focus of This Standard

This standard acknowledges that there are legacy systems, like CSTAR, that contain exit information or other notes by service providers in their provision of care, that automatically import into the Homeless Management Information System. There are providers, however, who only access HMIS through Clarity, and not all organizations are sufficiently large to have proprietary systems that can integrate through background server processes or other application programming interfaces (APIs). This standard does not require providers to be on any legacy system and should not be interpreted as such.

If HMIS includes a MANDATORY non-free form set of fields that assures the intent of this standard, then the PROS Board shall reconsider this standard.
Standards of Public Good Accounting and Reporting

Scope and Scope Exceptions

Organizations

These standards apply to those service providers who work with individuals experiencing homelessness in San Diego County who are in scope in PROS-HOUS-Mi-501 Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness.

Organizations excluded from these standards are those outside of scope in PROS-HOUS-Mi-501 Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness.

See scope and scope exceptions in that principle for more detail.

Key Terms

Central Information Hub. Refer to PROS-HOUS-Mi-501 Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness.

Continuous Quality Improvement (CQI). This is a deliberate, defined process within an organization that assures responsiveness to customer needs and outcomes.

Data Collaborative. Refer to PROS-HOUS-Mi-501 Standard for Public Good Accounting and Reporting on Organizational Sharing and Utilization of Regional Data in Homelessness

Data Quality Assurance. Quality assurance is the term used in both manufacturing and service industries to describe the systematic efforts taken to ensure that the product delivered to customers aligns with the contractual and other agreed-upon performance, design, reliability, and maintainability expectations of that customer. In homelessness services, this term applies to the data used in reporting.

Types of Departure. Departure is when an individual leaves one program for another. For the purposes of this standard, we created two simplistic types of departures. The first type of departure is when the client is in the ENROLLED phase and there has not been any contact for more the programs allotted inactive time period (typically more than 90 days), they are then automatically removed from the system. This would be classified as an informal departure since the individual became unreachable. The second type of departure is when the client’s needs are met, entered housing, or willfully exits the system as a result of any type of program provided by a Provider. In other words, the client departs the systems for any known reason. This would be classified as a formal departure.
Recognition – Initial and Subsequent Measurement

Organizations in scope shall demonstrate a good faith effort that they document for every enrolled client in HMIS Case Notes a “SITREP” (Situation Report) per contact, at the time of departure the information that will assist any future provider with their provision of services, and no more than ninety days since the previous SITREP. The SITREP should follow this structure.

In the header:
- Start and end with the words “SITREP,” in the Title section;
- The date of the “SITREP” in the Date section;

In the body, the numbering of each section is REQUIRED:
1. Goals of the client yet to be achieved;
2. Goals of the client that have been achieved;
3. Practices/ triggers for the client that reduce engagement; and
4. Practices/ interests for the client that enhance engagement.
5. Any additional comments that a Provider might need to make

The SITREP must stand on its own. That is, referring to a previous SITREP or causing anyone to have to search through historic case notes does not demonstrate good faith effort. Please refer to Appendix A for definitions of Enrolled, Contact, and Engaged in the Understanding HMIS section. For a specific example of what a SITREP should look like please refer to Appendix B in the SITREP Example section.

Initially, an organization shall recognize its good faith effort when the organization has implemented a process, whether manual or technological, that the organization believes meets the good faith requirements above.

Subsequently, for any period of time after an initial recognition, an organization shall demonstrate its good faith effort by additionally meeting these conditions:

1. The organization maintains a record of management’s reviews of this manual or technological process;
2. The organization maintains a record of management directives that are a result of the reviews; and
3. The organization maintains a record of the trends in the case note documentation specifically as a proportion of the number of client records where the good faith effort occurred.

Special Note on Organizations with Limited Resources

The PROS Board acknowledges that there are organizations whose limited resources are spent primarily on servicing those experiencing homelessness and that there would be a reduction in services if resources were allocated to meet the good faith effort in case note documentation specified here. The PROS Board asserts that such a reduction is acceptable and in fact obligatory for the increase in overall likelihood that
people experiencing homelessness will end their homelessness permanently and as efficiently as can be reasonably expected in our region.

**Presentation on Performance or Financial Reports**

The initial recognition of good faith effort shall be reported in the organization’s first publicly available annual performance or financial report, including publicly viewable tax returns like a Form 990, after the initial recognition.

Additionally in any management discussion notes on any independently audited financial statements or any publicly viewable reports and for the period of time concerned, the organization should provide an attestation that any organization using its SITREP in the case notes should be able to avoid retraumatization of its clients as well as streamline its services.

Subsequent measurements of good faith effort shall be reported minimally in all publicly available performance or financial reports in the fiscal year after initial recognition, including publicly viewable tax returns like a Form 990 and annual performance reports. The organization shall account for these measures annually going back to the fiscal year of initial recognition or three years, whichever is shorter.

In addition to the management discussion notes described above, the notes should specify for the period of time concerned the beginning and end measurements of the proportion of records where the good faith effort occurred.

**Disclosure Requirements**

When reporting subsequent measurements of good faith effort pursuant to this standard, the organization must disclose the methods by which it maintains its records, and when independently audited or reviewed, the auditor or reviewer should make an evaluative statement whether those records are a material representation of organizational behaviors that meet the intent of this standard.

Of note, this standard does not specify exactly where within reports an organization must provide the information or disclosures required in this standard. See Appendix B for example applications of this standard.

**Effective Date and Transition**

This standard shall be effective 1 January 2023.

Organizations whose fiscal years ending between 1 January 2023 and 31 March 2023 may wait for their subsequent fiscal year to begin to affect this standard. For any reports issued between 1 January 2023 and the beginning of an organization’s fiscal year, the organization should minimally disclose its intention to transition to this standard in its following fiscal year.
Appendix A:

Background Information

Information on CSTAR
[need to add this background material]

Understanding HMIS

In order to ensure that there is a universal understanding of the HMIS system and to ensure that the same lexicon is being used throughout the region, client entry will be briefly described here. When a client is interacted with for the first time there is a procedure that every Outreach Worker goes through to hopefully get enough information to enter the individual into the system. There is a common understanding that sometimes individuals do not want to work with the Outreach Worker right away, this is fine and regionally understood. However, it is expected that the Worker builds a rapport with the individuals so that they can eventually be entered into HMIS.

Once enough information is provided and they are entered into the system, the client has become ENROLLED. During this time, it is expected that Outreach Workers provide a SITREP as outlined above. Every time and hereafter there is an interaction with the individual, after the ENROLLED phase, another SITREP should be inputted into the system (as this is considered a CONTACT per RTFH’s definition). Finally, once an individual has been placed into a program they are then in the ENGAGED phase. Depending on the program and its results, if the individual has a formal exit, a SITREP should be inputted with the correct information.

Below are definitions that have been interpreted from HMIS definitions for ENROLLMENT, CONTACTS, and ENGAGEMENT. A direct link to those definitions can be found here, www.rtfhsd.org/wp-content/uploads/2019/03/Updated-HMIS-Cheat-Sheet-Outreach-Projects.pdf

ENROLLED: When enough information has been gained with a client who is interested in ending their homelessness through available programs and services.

CONTACT: Whenever an Outreach worker interacts with an individual to either build a rapport or assist them with their goals. It is recognized that a Contact technically happens before Enrollment but in order for that contact to be recorded the individual must be Enrolled. Therefore, when an individual is Enrolled they also had a Contact, which means that contact should be recorded as well.

ENGAGEMENT: When information has been given to the Outreach worker from the individual and they are able to be placed into a program, a deliberate client assessment, or a beginning of a case plan is developed.
Basis for Conclusions

Varying Practices in Case Notes

Information Useful to a Service Provider

Alternative Views and Risk Areas That May Need Addressing in Future Revisions

[input material from survey responses and comments on worksheets or stated in WG discussions that could be a risk to consider or an alternative view]

Appendix B

Example Specific Applications of this Standard

Publicly-Funded Service Provider
A …[complete as we get WG feedback]

Notes to Help Readers of Performance or Financial Reports Following This Standard

Potential Investors in a Service Provider
By looking for the disclosures and reportable information specified in this standard, a potential investor in a service provider can determine ….[complete as we get WG feedback]

A Service Provider with Heavy Referrals from Another Service Provider
By looking for the disclosures and reportable information specified in this standard, a service provider can understand the depth and nature of a referring agency’s data quality… [complete as we get WG feedback]
A SITREP Example

1. This is how the overview of a SITREP and what it should look like in the system

<table>
<thead>
<tr>
<th>Title</th>
<th>Category</th>
<th>User Full Name</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITREP</td>
<td>No Category</td>
<td>Danny Byers</td>
<td>10/21/2022</td>
</tr>
<tr>
<td>Alpha Project for the Homeless</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. This is what the SITREP should look like when it is completed

<table>
<thead>
<tr>
<th>Title</th>
<th>Category</th>
<th>Agency</th>
<th>Date</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITREP</td>
<td>No Category</td>
<td>Alpha Project for the Homeless</td>
<td>10/21/2022</td>
<td></td>
</tr>
</tbody>
</table>

1. Goals of the client yet to be achieved: Needs an income
2. Goals of the client that have been achieved: Has received ID
3. Practice/factors for the client that reduces engagement: Does not like talking about the past
4. Practices/interest for the client that enhance engagement: He likes to talk about sports
5. No additional comments

It is crucial that each of these sections starts with the corresponding number. The list feature can be used to make this less cumbersome.

While this method does take more time to maintain structure, there is consensus that the added time will lead to a greater net positive for the region as it substantially reduces bottlenecks.

Some methods that have been suggested to help make this principle easier to follow are to have this general structure in the Notes app so that it can be more easily copied and pasted over.