Exposure Draft
Proposed Standard for Public Good Accounting and Reporting on Long-Term Housing Outcomes of Serviced Clients in Homelessness Services

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 No. 2022-ED-004

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. 2022-ED-004
• Sending a letter to “Research and Technical Director, Serial Reference No. 2022-ED-004, 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 above. 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 the reporting of long-term outcomes of clients who have exited programs intended to end an individual’s homelessness condition.

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 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 reporting long-term outcomes seeks to increase consistency at the program and service levels within the homelessness system of care so that funders can make appropriate comparisons on performance. To be clear, this proposed standard does NOT establish benchmarks of performance; funders or other evaluative entities, like the San Diego County Taxpayers Association, should elect to create those benchmarks as reporting is made consistent across the region.

This document covers all necessary related aspects of this proposed standard, including purposes, scope and expectations on long-term outcome reporting of individuals experiencing homelessness who have been serviced within the San Diego region’s system of care.
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Objective

The PROS Board issues these reporting standards on long-term housing outcomes of individuals who had experienced homelessness, and were “exited,” i.e., disenrolled, from a homelessness service program in the San Diego region. This standard provides the measurement and reporting requirements that assist stakeholders in comparing organizational performance who face a shared set of regional challenges, and the likely economization of resources as a result of those comparisons will increase the likelihood an individual experiencing homelessness will end their homelessness permanently and as efficiently as can be reasonably expected in our region.

Intended Regional Effects of Issuing This Standard

This standard aims to increase reporting consistency of the long-term housing outcomes of various programs and services within the homelessness system of care so that funders can make appropriate comparisons on performance. Of note, this reporting standard permits stakeholders to remove common regional challenges, e.g., lack of housing, as factors in their comparisons across programs and services. For example, if program X and program Y are jointly affected by San Diego’s housing shortage, then the same long-term outcome measurements can be more directly compared and tied to differences in managerial practices and other factors, rather than regional factors.

Consistency in reporting on long-term outcomes of serviced individuals who have experienced homelessness will also create the opportunity for systems reviews to “drill down” into other causes for differences in long-term housing outcomes.

To be clear, this proposed standard does NOT establish benchmarks of performance; funders or other evaluative entities, like the San Diego County Taxpayers Association, should elect to create those benchmarks as reporting is made consistent across the region.

Other Regional Purposes Outside the Focus of This Standard

This standard provides consistency in reporting long-term housing outcomes, not in long-term wellness, which the PROS Board acknowledges would be significantly more useful in comparing performance across programs and services. Long-term wellness is likely to be highly subjective and could also differ significantly between the perspectives of funders and persons who have experienced homelessness, and such a reporting standard would require regional consensus after debating through numerous value differences. That said, this may become another area of exploration for the PROS Board, as it seems there should be enough common ground between those two stakeholder types. There appear to be significant numbers of funders who share an objective to “end homelessness” or get to “functional zero” as well as individuals experiencing homelessness who consent to receive services resourced by others. However, for the purposes of this long-term housing outcome reporting standard, wellness is outside the focus.
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 rule for more detail.

Key Terms

**Exit or Exited**. [define what “exit” means in this context]

**Permanent Housing**. (Same as US Department of Housing and Urban Development definition)
Permanent housing (PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. Under PH, a program participant must be the tenant on a lease (or sublease) for an initial term of at least one year that is renewable and is terminable only for cause. Further, leases (or subleases) must be renewable for a minimum term of one month. The CoC Program funds two types of permanent housing: permanent supportive housing (PSH) for persons with disabilities and rapid re-housing. Permanent supportive housing is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability. Rapid re-housing (RRH) emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing.

**Supportive Services Only**. (Same as US Department of Housing and Urban Development definition)
The supportive services only (SSO) program component allows recipients and subrecipients to provide services to homeless individuals and families not residing in housing operated by the recipient. SSO recipients and subrecipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons and families, link clients with housing or other necessary services, and provide ongoing support. SSO projects may be offered in a structure or structures at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies.
Transitional Housing. (Same as US Department of Housing and Urban Development definition)

Transitional housing (TH) is designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program’s TH program component have not changed significantly from the TH provisions under SHP.

Recognition – Initial and Subsequent Measurement

An organization in scope shall initially and subsequently recognize an individual, whom the organization previously serviced and exited to permanent housing, whether intentionally or not, as “returned to homelessness” if recognized as such in the Coordinated Entry System (CES).

Special Note on Homelessness Status

The PROS Board acknowledges it is possible that an individual, who has exited a program or service, may again be experiencing homelessness. However, because the individual is not enrolled in any program, the individual would not be recognized in HMIS as having returned to homelessness. This recognition issue, however, may be mitigated with street outreach, and these reporting standards, combined with the reporting standards of PROS-HOUS-Ma-501 Standards of Public Good Accounting and Reporting in Street Outreach Services, still present a reasonably precise picture of homelessness statuses writ large. For example and to state differently, the regional goal to effectively end homelessness, if all organizations report no returns to homelessness with this reporting standard and all street outreach programs report no “previously unknown unsheltered” and no “already known existing unsheltered,” then homelessness would be functionally zero. Alternatively, if an organization reports no individuals returned to homelessness with this standard, and various outreach programs report their inventories of trust building occurring with individuals living on the street, then the organization is performing differently than their peer organizations whose service recipients have returned to the streets.

Presentation on Performance or Financial Reports

On and In the Notes of Statements of Financial Position

To the extent it is feasible, organizations shall report conspicuously in the notes of any statements of position the following measurements for that date of the financial position:

1. **Within the last six months** of the date of the financial position:
   a. The number of unique individuals who exited their programs
   b. For that set of unique individuals, the number and proportion who exited to permanent housing
   c. For that set of unique individuals, the number and proportion who have returned to homelessness as of the date of the financial position
2. **Within the last six to twelve months** of the date of the financial position:
   a. The number of unique individuals who exited their programs
   b. For that set of unique individuals, the number and proportion who exited to permanent housing
   c. For that set of unique individuals, the number and proportion who have returned to homelessness as of the date of the financial position

3. **Within the last twelve to twenty four months** of the date of the financial position:
   a. The number of unique individuals who exited their programs
   b. For that set of unique individuals, the number and proportion who exited to permanent housing
   c. For that set of unique individuals, the number and proportion who have returned to homelessness as of the date of the financial position

4. **Within the last twenty four to forty eight months** of the date of the financial position:
   a. The number of unique individuals who exited their programs
   b. For that set of unique individuals, the number and proportion who exited to permanent housing
   c. For that set of unique individuals, the number and proportion who have returned to homelessness as of the date of the financial position

If an organization has multiple programs, e.g., emergency shelter, transitional housing, and permanent supportive housing, the organization must provide the above information by program.

If an organization operates in a sufficiently large geographic area, then the organization may elect to break down the above information and group their programs and services into geographic subdivisions. Like in *PROS-HOUS-Ma-501 Standards of Public Good Accounting and Reporting in Street Outreach Services*, those geographic subdivisions, if used, should be identifiable in public records, like zip codes, school catchment zones, a city’s subdivision, etc. It should not be a geographic subdivision that is proprietary.

If it is not feasible for an organization to report the data in 1a-c through 4a-c due to data inaccessibility, then that organization does not need to report, and must instead explain why it is not feasible. This applies in cases where at least one of the data points listed in 1a-c through 4a-c is inaccessible.

**In the Notes of Statements of Activity**
Organizations in scope shall report conspicuously in the notes of any statements of activity the measurements in the previous section at the beginning of the period of activity and the measurements in the previous section at the end of the period of activity.

**In Any Performance Reporting**
If an organization in scope publishes publicly available performance reports, like in an annual report, separate from financial statements, then the organization shall present the information in the previous two subsections.
Disclosure Requirements

When reporting pursuant to this standard, the organization must disclose the methods by which it determined such measurements, and when independently audited or reviewed, the auditor or reviewer should make an evaluative statement whether those methods meet the intent of this standard.

Effective Date and Transition

This standard shall be effective 1 January 2023.

Organizations whose fiscal years end between 1 January 2023 and 31 March 2023 may wait for their subsequent fiscal year to begin to effect 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

Regional Task Force on Homeless “Performance” Dashboard, as of October 2022

https://public.tableau.com/app/profile/gaither.stephens3473/viz/00036-RegionalTaskForceontheHomeless-CPD/CommunityPerformance

This dashboard shows returns to homelessness separated by program types across all programs and providers. This Principle would ask providers to report these data, broken down at the program level.
Basis for Conclusions

Often Cited Problems in Tracking Long-Term Outcomes Are Too Ambiguous
[awaiting public comment and working group member comment on this section]

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

One possible risk area with this standard is the possibility of “soft contact” causing persons to be officially documented as having returned to homelessness when, in reality, they are housed and merely accessing resources provided by a service provider. For example, a person experiencing homelessness may be matched to permanent housing but still access resources at a day center. If that person’s information is input into HMIS, they would be documented as having returned to homelessness when in reality they are still occupying permanent supportive housing.

Another possible risk area with this standard is the possibility that measurements reported based on this standard would be more accurate in regions where there is greater capacity for outreach work. If people exit permanent supportive housing and return to homelessness in a region where there is little to no outreach, then their return to homelessness is far less likely to be recorded by an outreach worker. Although this is a limitation of the measurement, awareness of this limitation can allow interested parties to gain more nuanced insight from reported data. Specifically, if few or no returns to homelessness are reported in a region, interested parties should examine those findings in tandem with the prevalence of outreach work in the same region and draw conclusions based on that holistic view as to the root causes of the quantity of returns to homelessness.

Appendix B

Example Specific Applications of this Standard

Service Providers with Substantive Portfolio of Homelessness Services

Service providers should detail the information pursuant to this standard in their audited financial statements and any annual performance reports.
Appendix C

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, at a system level and at more granular levels, the prevalence of exits from permanent supportive housing and returns to homelessness. Returns to homelessness should be viewed as outcomes resulting from a plethora of factors including, but not limited to, resources available for outreach, quality of managerial practices or organizational structure, quality of outreach work, client acuity, and availability and affordability of housing. These measurements should not be examined in a vacuum, but should instead be studied in conjunction with other data elements of program outcomes.

Public Officials or Staff with Homeless Services Budgets
By looking for the disclosures and reportable information specified in this standard, a public official can see how the previous clients of their various contracted agencies have or have not returned to homelessness. Again, these data should not be examined in isolation from other indicators, nor should they be attributed solely to programmatic or provider characteristics.