

## Frequently Asked Questions on HUD's System Performance Measures

### General

1. How will the System Performance Measure data affect a CoC's submission for the FY16 CoC Program NOFA?

**Answer:** For the FY2016 CoC Program competition, HUD will focus on a CoC's ability to produce the System Performance Measures data. This is intended to be a test for whether CoCs can run the data. However, data quality is and will continue to be important in producing data and measuring against the CoC's baseline. HUD expects CoCs to incorporate this data into their larger system improvement activities. Additionally, HUD is aware that this first round of submissions will have data quality issues. HUD will take into account these data quality issues and strongly encourages communities to carefully document any data quality challenges.

2. How will CoCs submit their System Performance Measure data to HUD? When is the data due to HUD?

**Answer:** After running the System Performance Measure report out of your vendor's HMIS software, CoCs will enter that data into HUD's Homelessness Data Exchange (<http://www.hudhdx.info/>). For the FY2016 CoC Program NOFA, this data must be entered into HDX by Monday, August 1, 2016 at 7:59:59 PM EST. Instructions on how to submit data in HDX can be found here: <https://www.hudexchange.info/resource/5054/system-performance-measures-data-submission-guidance/>.

3. What is the reporting period for the measures?

**Answer:** The reporting period follows the Federal Fiscal Year, which is October 1 through September 30<sup>th</sup>. For the FY2016 CoC Program competition, CoCs will submit data for October 1<sup>st</sup>, 2014 through September 30<sup>th</sup>, 2015. The timeframe allows HUD to gather data in a uniform fashion across all CoCs and the projects in those CoCs, regardless of individual project grant periods.

4. Several of the Performance Measures refer to "system-level" data. How does HUD define a system? Are SSOs included? Are RRH projects included? What about projects funded by PATH, ESG, SSVF, VASH and other funders?

**Answer:** The concept of system performance is that all members involved with the effort of ending homelessness are coordinated to end homelessness. HUD believes that CoCs must see their efforts to end homelessness as a united effort. Most of the system performance measures rely on the use of HMIS data that reflects the full system of homeless assistance available in each community, and not just those projects that are CoC Program funded. If the project is of one of the types included in the measure calculation, it should be included, regardless of the funding source. CoCs and HMIS Leads should understand their current system, identify projects not participating in HMIS, and work closely with those projects to encourage their participation in HMIS, as they are a valuable member of the overall system of homeless assistance. HUD is aware that some partners are not anxious to participate in data collection and reporting, as well

as other functions associated with HMIS. HUD encourages you to continue to work with them to show their participation is important. However, please note that victim service provider projects cannot be entered into HMIS. These projects must enter their data into a comparable database, and therefore will not be included in any calculation of system coverage.

5. I have several projects in my CoC that do not participate in HMIS, and that are not required by any funding source to do so. What impact will their lack of participation have on my CoC?

**Answer:** HUD will take into account HMIS bed coverage and data quality in reviewing the system performance measures, and while data collection and quality challenges will be considered in reviewing the measures, it remains a priority to have the most complete data as possible, both through high bed coverage and good data quality. As CoCs strategically plan to meet the needs of persons seeking homeless services, it is critical that they have information about all of their providers. Without data from all projects dedicated to serving persons who are homeless, the CoC will not be able to understand the systemic efforts to end homelessness in their community, or to present HUD with a complete picture of homelessness. Many CoCs have successfully been able to increase their system coverage by working with local or state funders to integrate HMIS into their requirements with agencies, or by creating local incentives for HMIS participation. Many CoCs have been successful showing providers that the data is useful to them - it helps them to better serve people and even get more funding. If a CoC would like more guidance on this topic, they should request Technical Assistance (TA) from HUD:

<https://www.hudexchange.info/get-assistance/technical-assistance/>.

6. Are victim services providers included in any of the data on System Performance Measures?

**Answer:** Victim service provider projects do not enter client-level data into HMIS. These projects must enter their data into a comparable database, and therefore will not be included in any calculation of system coverage or in any of the data for the system performance measures. Please note that this only applies to projects that are defined as “victim service providers” under the VAWA Act. Data is included from projects that serve victims of domestic violence but who are not considered “victim service providers.” For more information on “victim service providers,” please go to: <https://www.hudexchange.info/faqs/2686/how-does-hud-define-victim-service-provider/>.

7. Has HUD set any system coverage or data quality thresholds for the System Performance Measures, as is currently done for the Annual Homeless Assessment Report (AHAR)?

**Answer:** For the short term, no thresholds have been set. Unlike the AHAR, HUD expects every community to report the System Performance Measure data. HUD may impose data quality factors in its CoC Program NOFA criteria in the future. This would likely apply to both the data quality and bed coverage. For bed coverage, HUD set a standard of 86 percent in the 2016 CoC Program NOFA. However, data quality and bed coverage standards will evolve over time as HUD receives more information on how systems are working. HUD is looking at various ways to gauge data quality. As this evolves, HUD will provide more information.

8. Our CoC funds some projects that are located outside of our geography - should those projects be included in our SPM?

**Answer:** CoC's should only include data on projects within their CoC boundaries. This may involve pro rating some projects where there are not clear boundaries. This is most relevant when working with projects funded by other sources, including the VA. The first place where this would really show up is the Housing Inventory Count (HIC). There should be a fairly close relationship between the projects included in the system performance measures and those entered in the HIC.

9. Has HUD set any performance benchmarks or targets for the System Performance Measures?

**Answer:** HUD will be comparing communities to themselves, and will limit the amount of comparison done across CoCs. HUD wants to see positive changes for the entire CoC (such as declines in length of time homeless), but it does not yet have enough data on these measures to know what reasonable benchmarks or targets for improvement would be for any of the measures. HUD will carefully analyze the System Performance Measure data that is submitted to get a better understand of what benchmarks or targets would be appropriate.

10. My CoC covers a very large geography, and we often analyze our data by regions. Is it possible to submit System Performance Measure data by subset or region?

**Answer:** While it is useful to look within your CoC at different regions for your own analysis and planning, for HUD purposes, you will submit a single set of data in HDX for the entire CoC. We encourage communities to carefully document the details of their challenges when they submit their data.

11. Do the System Performance Measures replace the Annual Performance Report (APR)?

**Answer:** No. The APR is still required of all CoC Program recipients, and is a grantee-level report that allows HUD to understand how grant funds were expended and the outcome of those efforts. The System Performance Measures are system-level data that allow HUD to understand how a CoC's entire system of homeless assistance is performing.

### *Measure Specific Questions*

1. Measure 1, Length of Time Homeless, asks for data on both Emergency Shelter (ES) and Safe Haven (SH) projects in a single row. Why is HUD choosing to include SH with ES data? Before SH was designated as its own housing type, SH projects were considered either TH (no lease) or PSH (lease). How does it now translate to an ES length of stay calculation?

**Answer:** HUD is not lumping SH with ES but does include it in the first metric under Measure 1, Length of Time Homeless, because SH and ES are the projects types that map to the chronically homeless definition. SH is a unique and important program model, and HUD understands that SH stays may be longer than ES stays. SH projects that did not previously reclassify as TH or PSH are considered a form of shelter and people in SH projects are considered literally homeless.

2. How far back into HMIS data does the Length of Time Homeless Measure (Measure 1) look?

**Answer:** The HMIS Programming Specifications clarify that the length of time goes to either the longest continuous length of time beyond 365 days from the reporting period OR to the “lookback” date. CoCs do not include time prior to the lookback date for system data. That means that any time homeless before October 1, 2012, will not be included. When CoCs begin using data from 3.17 (this data element will be renamed 3.9.17 starting 10/1/2016), HUD plans to include all time reported in that field, even if that time extends further in the past than October 1, 2012. HUD anticipates releasing more information after October 2016 to clarify any questions as they relate to reporting data from the 3.17/3.9.17 data elements. HUD is not requiring data from these fields in this initial submission in HDX. When HUD eventually does require the inclusion of 3.9.17 data, the Length of Time Homeless measure will be reported with and without it so CoCs will still be able to compare their data from year to year, and not compare a year without 3.9.17 to a year with 3.9.17.

3. Several of the measures are looking at Emergency Shelter data. Our community has sanctioned homeless camps- very structured- that could provide similar data. The camps aren't emergency shelters, however. Is HUD considering a new program type for these types of transitional camp/shelter sites?

**Answer:** At this time, camps are not counted as a separate project type and HUD is not considering adding them as a project type. Camps will continue to be viewed as unsheltered situations for measurement purposes, as indicated in the language in the [HEARTH “Homeless” Definition final rule](#). HUD will continue to learn what it can and provide guidance and technical assistance where needed to assist communities to address encampments, sanctioned or otherwise.

4. When determining the universe for Measure 2, how should we count clients that exited from different project types on the same day? For example, if a client exited from both an outreach project and an ES project, both with a PH destination, which project type category would the client count towards? Whichever has the latest entry date?

**Answer:** The HMIS programming specifications address many such issues. Generally, HUD discourages having persons in multiple projects at the same time. While this is not always possible, it often is. For instance, with regard to the example you gave, many projects require a person to be exited from street outreach at the time they enter ES. This is not always the case and it often depends on the nature of the ES or the Outreach program but such local protocols can address this issue. If you do not see the answer to this specifically addressed in the HMIS programming specifications please submit an AAQ with some specific examples.

5. Why does Measure 4 look only at increased income, rather than maintaining or increasing income like the APR measures?

**Answer:** The HEARTH Act defined the selection criteria that are the basis for the System Performance Measures. The criterion related to income is “jobs and income growth for homeless individuals and families.” HUD is aware that this system-level measure is different from the project-level measures in the APR.

6. Measure 4 looks at income and employment growth among persons served by CoC Program funded projects. Since the reporting timeframe for the measures covers both a period when the income of minors was assigned to the minor, as well as the new way of assigning the income of minors to the HoH, won't that make the income measures look very strange? It will look like many people had a large jump in income in October 2014 when that isn't true.

**Answer:** HUD is aware of this issue and will bear the results in mind. This is particularly relevant for this first year of data and will become less of an issue in future years. There are several issues associated with data standards changes that HUD is aware of and will consider as it reviews and analyzes this data.

7. Given that no data will be submitted for Measure 6 in 2016, how will the baseline for the Measure be established?

**Answer:** Measure 6 is not applicable to CoCs in 2016, as no CoC has exercised the authority provided by the HEARTH Act to serve homeless families with children and youth defined as homeless under other Federal statutes (see section 422(j)). In future years, if a CoC exercises that flexibility, their baseline year for this measure will be established at that point.

8. Successful housing placement does not seem like a fair measure, as it is so dependent on local factors that CoCs cannot control (housing market, etc.). How can HUD expect project types that do not provide housing (such as street outreach) to report on successful housing placement?

**Answer:** HUD believes that housing placement is in fact a very important measure and also one that we have asked CoCs to measure even before the system performance measures. Our ultimate goal is, and has been, to help people exit homelessness to a stable housing situation. Keep in mind that “successful” for 7a.1 includes sheltered or temporary situations and not just permanent housing, while the latter two metrics—7b.1 and 7b.2—focus on permanent housing exits in a way that is familiar to CoCs already. We have seen communities with difficult housing challenges overcome the issue of limited housing affordability and availability to accomplish great things. That certainly is not to say that it is not a challenge, but this measure captures a critical set of metrics related to ending homelessness for households.

9. For 7a.1 exits from street outreach: If a PATH street outreach project is serving a client who was in ES when they first contacted the client, should that client count in this measure?

**Answer:** Yes. All clients assisted through PATH street outreach projects and entered in the CoCs HMIS are included in this measure and should be treated like any other street outreach project for calculation purposes. PATH clients who are in ES when initially enrolled should still have their Destination data (data element 3.12) collected and entered in HMIS. If such client exits PATH

and still remains in emergency shelter, this would be considered a positive outcome per the calculation. Ideally, PATH clients who are enrolled while in ES will be assisted to move to permanent housing by the PATH project and other local assistance sources. Keep in mind that it is possible for one PATH funded project to serve two separate populations of focus. In such cases, the PATH project must have two projects set up in their HMIS – one as a Street Outreach project type for the street homeless clients and another as a Supportive Services Only project type for the sheltered or at risk homeless clients.

10. Measure 7b reports on the retention of Permanent Housing. Does HUD have a time frame for retention of permanent housing to be considered successful?

**Answer:** For this measure, HUD does not have a timeframe requirement. Historically, the retention requirement was 6 months. One of the reasons HUD is not focusing on this is because it did not have access to data on returns to homelessness. The data on returns in Measure 2 will capture data on people who do not retain their permanent supportive housing as well as other forms of permanent housing, so together, Measure 2 and 7 cover the cycle of ending homelessness—from getting a household permanently housed and ensuring that they don't return to homelessness.

### ***HDX Submission***

1. What steps should a CoC take if they cannot see the new report or submit button?

**Answer:** In order to be able to access the Sys PM reporting module in HDX, each CoC must designate a Primary Contact in HDX. The Primary Contact is the contact person for the HUD approved Collaborative Applicant and that individual is responsible for ensuring that HUD receives complete and accurate System Performance Measures data from the CoC. To achieve this, the Collaborative often allows other CoC staff to access to the Sys PM, PIT, HIC, and AHAR HDX modules as authorized users.

The CoC HDX Primary Contact must individually assign or modify rights to each HDX module for each user by checking the box that corresponds to the appropriate level of access.

If you are having issues seeing the Submit buttons, before submitting your data, please confirm that you have input notes for all Validation Warnings and corrected all Errors. If there are Errors preventing your data submission, the Submit Data button on the Reporting Status page will be gray.

2. For submission in HDX in 2016, what reporting period should my submission cover? Do I need to submit data to populate the previous period fields?

**Answer:** The reporting period for the System Performance Measures report that will be submitted in HDX in summer 2016 is 10/1/2014-9/30/2015. You do not need to submit data to populate the previous period fields. In future years, these fields will be autopopulated with your submissions from prior years.

3. If we are submitting data for the period 10/1/2014-9/30/2015, what is the significance of the lookback date provided of 10/1/2012?

**Answer:** The lookback date refers to the earliest date that data from the HMIS will be used in order to complete reporting for this reporting year. The relevance of 10/1/2012 is related primarily to the method for calculating Measure 2. This measure begins with clients who exited to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS system for up to two years after their initial exit. For the reporting period from 10/1/2014-9/30/2015, the date range two years prior is 10/1/2012-9/30/2013.

4. What is the source of the PIT Count data that is auto populated in the HDX? What if our CoC did not conduct a street count last year?

**Answer:** In 2016, the PIT Count data is auto populated from the final PIT submission from the January 2015 count. The previous year's data is populated from the 2014 count, unless no street count was conducted that year. In that case, the 2013 street count is used.

5. Once data are entered in the HDX, can the entry be overwritten? Can we re-submit data if there are errors?

**Answer:** Data can be overwritten, whether manually entered or imported, until the point of submission. Once you have submitted your data, you may request assistance via the AAQ if you wish to resubmit prior to the due date.

6. Will any data cleaners reach out to contact us following our submission?

**Answer:** No. The submission by the CoC will be considered final.

7. We are concerned that some of our numbers may not be accurate or may reflect poorly on our CoC. How can we explain our responses?

**Answer:** Users should leave a note of explanation for each validation warning received or any other field they wish. A note of explanation should be completed for each warning received by clicking on the field with the warning and entering a note. Click on the "Save Notes" box on the bottom left of the notes box to save your explanation.