

# Frequently Asked Questions

## AB 977



**California  
Interagency Council  
on Homelessness**

*Last Updated: May 2024*

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## Introduction

This document is intended for grantees, subgrantees, Homeless Management Information System (HMIS) Leads, and other entities involved in the process of project setup and data entry into HMIS per [AB 977](#) and [Welfare and Institutions Code section 8256](#). This document is provided in addition to, not in replacement of, each state department's project setup instructions document, which can be found on the following websites:<sup>1</sup>

- [Cal ICH Grantee Project Setup Instructions](#)
- [CDSS Grantee Project Setup Instructions](#)
- [HCD Grantee Project Setup Instructions](#)
- [DHCS Grantee Project Setup Instructions](#)
- [Project Setup Instructions for HMIS Leads](#)

The California Interagency Council on Homelessness (Cal ICH) has contracted with Abt Global (Abt), formerly Abt Associates, as the technical assistance (TA) provider for AB 977. Questions will be added to this document from the following sources: office hours, trainings, the [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com) inbox, and other TA activities. Questions are divided into six sections: general questions that apply to all programs, questions that apply to programs funded by the California Interagency Council on Homelessness (Cal ICH), questions that apply to programs funded by the California Department of Social Services (CDSS), questions that apply to programs funded by the California Department of Housing and Community Development (HCD), questions that apply to programs funded by the California Community Colleges Chancellor's Office (CCCCO), and questions that apply to programs funded by the California Department of Veterans Affairs (Cal Vet). At the end of this document is an appendix with a list of commonly used acronyms. Updates to this document will be disseminated via communication channels determined by each state department.<sup>2</sup>

For more information about any of the content in this document, or technical assistance for AB 977, please contact [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

### Programs Specified in Statute<sup>3</sup>:

- Cal ICH Homeless Housing, Assistance, and Prevention Program (HHAP)
- CDSS Bringing Families Home (BFH)
- CDSS CalWORKs Housing Support Program (HSP)
- CDSS Housing and Disability Income Advocacy Program (HDAP)
- HCD Homekey
- HCD Housing for a Healthy California Program (HHC)
- HCD No Place Like Home Program (NPLH)
- HCD Multifamily Housing Program (MHP), including the following subsidiary programs:
  - Supportive Housing Multifamily Housing Program (SHMHP)
  - Homeless Youth Multifamily Housing Program (HYMHP)
- HCD Veterans Housing and Homeless Prevention Act (VHHP)

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<sup>1</sup> For CCCC or CalVet Project Setup Instructions, please email [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

<sup>2</sup> Questions indicated as "NEW" are new since the last version of this document. Questions indicated as "UPDATED" have updated content since the last version of this document.

<sup>3</sup> These ten programs were specified in [Welfare and Institutions Code section 8256](#) as required to comply with AB 977 regardless of when the program commenced. Programs listed under State Funded Homelessness Programs that Commenced on or After July 1, 2021 have been determined by the departments to need to comply with AB 977 per [WIC section 8256\(3\)\(A\)](#).

- CCCCCO Community Colleges Homeless and Housing Insecure Pilot Program (HHIP)

State Funded Homelessness Programs that Commenced on or after July 1, 2021:

- CalVet Veterans Support to Self-Reliance (VSSR) Pilot Program
- DHCS Behavioral Health Bridge Housing (BHBH) Program
- Cal ICH Encampment Resolution Funding (ERF) Program
- Cal ICH Family Homelessness Challenge (FHC) Grants

Additional Programs Using HMIS

- CDSS Home Safe<sup>4</sup>

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<sup>4</sup> CDSS's Home Safe program is not currently required to enter data under AB 977. However, per the [All County Welfare Director's Letter Dated October 15, 2021](#), CDSS does require Home Safe grantees to enter data into HMIS. CDSS encourages Home Safe grantees to set up their HMIS projects in accordance with the AB 977 Project Setup Instructions and participate in TA and training activities.

## Questions That Apply to All Programs

### Questions About Which Programs and Grantees Need to Comply With AB 977

**1. Which grantees and subgrantees must comply with AB 977?**

[Welfare and Institutions Code section 8256 \(d\)](#) mandates that beginning January 1, 2023, grantees and entities operating the [state homelessness program specified in statute](#), as well as [state homelessness programs that commenced on or after July 1, 2021](#), as a condition of receiving state funds, must enter Universal Data Elements (Items 3.01–3.917) and Common Data Elements (Items 4.02–4.20 and Item W5 of the Individual Federal Partner Program Elements), as defined by the United States Department of Housing and Urban Development [FY 2024 HMIS Data Standards Manual](#), on the individuals and families it serves into its local HMIS, unless otherwise exempted by state or federal law. Grantees or entities that elect to subcontract services are responsible for ensuring subgrantees are in compliance with identified data reporting requirements as a recipient of state funding.

**2. Are projects funded by the ten state homelessness programs specified in statute that were in operation prior to 2021 required to enter data in HMIS?**

Yes. [Welfare and Institutions Code section 8256 \(d\)\(1\)\(A-J\)](#) mandates that grantees and entities of [specified state homelessness programs](#) must enter data into their local HMIS without limitation, covering all projects funded by the specified state homelessness programs made, including those prior to July 1, 2021.

**3. What are the benefits of using HMIS?**

The primary goal of HMIS is to better understand the scope and dimensions of homelessness locally and nationally in order to address the problem more effectively. The state of California uses HMIS to better inform homelessness policy and decision making. HMIS also helps in managing the flow of information between programs to give clients the best and the most efficient help possible.

**4. Do the data reporting requirements apply to existing grantees receiving awards after the enactment of AB 977?**

Yes. In addition to the ten specified state homelessness programs required to enter data into their local HMIS without limitation, [Welfare and Institutions Code section 8256](#) applies to new grantees of the [ten existing state programs](#) that commence on or after July 1, 2021. This includes new awards made to existing grantees for the ten specified state homelessness programs.

**5. Are state homelessness programs that existed prior to July 1, 2021, but are not named in AB 977 required to comply with AB 977 data reporting requirements?**

No, these programs are not currently required to comply with AB 977. Only [additional programs that commenced on or after July 1, 2021](#) are required to comply with AB 977.

**6. Are HUD funded programs where funding is distributed to some jurisdictions by the state required to comply with AB 977?**

No, these programs are not state homelessness programs because they are fully funded by the federal government, and therefore do not need to comply with AB 977. Federally funded housing programs already report into HMIS to meet HUD requirements.

**7. Will grantees who do not enter data directly into HMIS but instead import data from external data systems, following HUD's HMIS CSV specifications, on a regular schedule be considered compliant with AB 977?**

Yes, grantees will be considered compliant if the data is ingested into the local HMIS system and included in quarterly data uploads to the state's Homeless Data Integration System (HDIS). Data imports must include all data fields required by AB 977, follow HUD's HMIS CSV specifications, and meet Cal ICH data quality compliance requirements.

**8. Are recipients/distributors of stipends for Persons with Lived Experiences of Homelessness (PLEH) required to enter stipend information into HMIS?**

No, grantees are not mandated by AB 977 to enter stipend information into HMIS for Persons with Lived Experience of Homelessness (PLEH) who are participating in evaluation efforts, personal/professional development or trainings, or other related services provided by PLEH.

**9. How long do new grantees of identified state funded homelessness programs have to comply with the requirements of AB 977?**

New grantees of identified state homelessness programs must follow the compliance deadlines as set forward by the program's administering state department or agency. If grantees are unsure of compliance deadlines and are concerned that they will not be able to enter data when they begin serving clients, they can reach out to the administering department or agency.

**10. When do development projects that are not yet serving clients need to have projects set up in HMIS?**

AB 977 requires grantees operating specified state homelessness programs to enter data on individuals and families served into its local HMIS. For interim or permanent housing construction, acquisition, or rehabilitation projects, data must be entered beginning on the first day when the first individual or household is served by the program. In order for a grantee to be fully set up in HMIS and entering data for all clients served on the first day housing or services are provided, Cal ICH recommends grantees initiate the process of setting up projects in HMIS 90 days in advance of initial occupancy.

**11. What is the process for CoCs submitting data into California's Homeless Data Integration System (HDIS)?**

The 44 separate CoCs send their data to the HDIS via a secure file transfer system. HMIS Leads upload HMIS data into Cal ICH's HDIS on a quarterly basis. Grantees do not enter data directly into HDIS. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**12. Are Victim Service Providers (VSPs) prohibited from participating in HMIS?**

A VSP is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, domestic violence shelter and transitional housing programs, and other programs. A VSP is a designation at the organization level, not the project level.

VSPs are prohibited from entering client data into HMIS. This includes those organizations that meet the definition above and those that receive funds through the U.S. Department of Health and Human Services (HHS) Family Violence Prevention and Services Act (FVPSA), the U.S. Department of Justice

(DOJ) Office of Victims of Crime (OVC), or DOJ Office of Violence against Women (OVW), and who use those funds to help support projects serving survivors of domestic violence, dating violence, sexual assault, or stalking. VSPs are not subject to any reporting requirements under AB 977.

## **Questions About Project Setup and Ongoing Client-Level Data Entry**

### **13. What are grantees' responsibilities regarding the updated data elements and response options in the FY 2024 Data Standards?**

The [FY 2024 HMIS Data Standards](#) went into effect in all HMIS software beginning October 1, 2023. HUD provided HMIS Leads and vendors with instructions to map most data entered prior to October 1, 2023 to the new data standards wherever possible. HMIS end-users, including grantees of California state programs, have no data entry requirements for data elements that are mapped to the new data standards. In some cases, grantees and/or HMIS Leads may need to enter data for new fields that cannot be mapped to prior data. Updated HMIS Project Setup Instructions that include updates related to the FY 2024 Data Standards were made available to all grantees and recipients of programs subject to AB 977. HMIS Leads should have communicated with all HMIS users in their CoC about data entry requirements. Grantees who have questions about how to update data in their HMIS should contact their HMIS Lead for assistance.

In all cases, grantees are encouraged to review the updated client and project data after October 1, 2023 to ensure the data accurately reflects their projects and clients. For example, new responses have been added to the Race and Ethnicity and Gender fields. During their next conversations with their clients, grantees should discuss with their clients the new response options and update their demographic information in HMIS if necessary. Grantees can review HUD's [Data Collection Requirements for Transition to FY24 Data Standards](#) for additional information. Please review the updated AB 977 HMIS Project Setup Instructions for your department for more details on the FY 2024 Data Standards changes.

### **14. What if projects were not set up and/or client data was not fully entered by the program's HMIS data entry deadline?**

Grantees, subgrantees, and other entities should continue working with their HMIS Leads to set up projects and begin entering client data in HMIS, including retroactively entering data for clients who were receiving services on or after the program's data entry deadline. Data entry and quality assurance will be ongoing. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com). Please refer to your program's HMIS Project Setup Instructions for the HMIS data entry deadline for your program.

### **15. Does participation in Coordinated Entry (CE) count as HMIS participation for AB 977?**

No. Grantees must set up projects that align with their project activities (housing, shelter, and/or services) and enter client data into these projects. Entering clients into their CoC's CE project(s) does not constitute compliance.

Certain programs specified in AB 977 may allow a portion of program funding to be spent on the CoC's Coordinated Entry System (CES). In these cases, the CE project(s) in HMIS that are being funded should enter the program's funding code to indicate the CE project is receiving program funding specifically to support the CES.

## 16. Will Cal ICH have a protocol for naming projects?

No, Cal ICH will not be providing a protocol for naming projects. Administering state departments and agencies may provide [guidance](#) on naming conventions, and some local HMIS Leads have standard naming conventions. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977\_TA@abtglobal.com. Cal ICH will be using funding code fields (other funder text and grant ID) to identify projects.

From the [FY 2024 HMIS Data Standards Manual](#): While the project name is not required to match grant agreements, the project name should be consistent with the name used across reports (e.g., Annual Performance Report and Housing Inventory Count).

## 17. Which AB 977 projects should be set up using the continuum project field in HMIS?

Continuum Projects are defined in the HUD [FY 2024 HMIS Data Standards Manual](#) as follows: “A project within the geographic boundaries of the Continuum(s) of Care (CoC) associated with the HMIS whose primary purpose is to meet the specific needs of people who are experiencing homelessness or at risk of homelessness, by providing lodging and/or services. A continuum project is not limited to those projects funded by HUD and should include all of the federal partner projects and all other federally or non-federally funded projects functioning within the CoC.”

Projects that are limited to serving individuals experiencing homelessness should be marked as Continuum. See [this question](#) for more information on projects that serve clients who are at-risk of homelessness. For more information about the continuum project field, contact the local HMIS Lead. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977\_TA@abtglobal.com.

## 18. How should grantees set up projects in HMIS, particularly when projects provide a broad range of activities?

Grantees should create an HMIS project for each project type separately as defined by HUD guidance. The Abt TA team issued program-specific guidance on the project type field as part of the [project setup instructions](#) released by each administering state department or agency. The Abt TA team is providing additional support to grantees through regular office hours, the email helpdesk, targeted one-on-one TA requests, and recorded and live trainings. Grantees can work with the local HMIS Lead and the Abt TA team to identify appropriate project types. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977\_TA@abtglobal.com.

## 19. What are the requirements for a project to have the project type of permanent supportive housing (PSH)?

There are several types of permanent housing categories within HMIS. The following answer serves as general guidance, but grantees can work with the local HMIS Lead and the Abt TA team to identify the appropriate project type.

**PSH - Permanent Supportive Housing (disability required for entry):** A project that offers *permanent housing and supportive services* to assist people experiencing homelessness *with a disability* (individuals with disabilities or families in which one adult or child has a disability) to live independently. For purposes of HMIS project set-up, a project does not have to be targeted to people who are chronically homeless to be considered PSH; however, many CoCs have prioritized PSH in that way.

In contrast, a project that offers permanent housing (PH) to assist persons experiencing homelessness without a disability requirement would be set up as a different project type under Permanent Housing, depending on the length of assistance and whether or not services are also provided to clients.

**Rapid Rehousing:** housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and achieve stability in that housing. Beginning with the FY 2024 Data Standards, Rapid Rehousing projects select one of two RRH subtypes:

- **RRH: Housing with or without services:** A RRH project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants; or
- **RRH: Services Only:** A RRH project that provides services only and does not provide ongoing rental assistance or support any inventory for participants.

**Permanent Housing with Services:** permanent housing and supportive services but does not limit eligibility to individuals with disabilities or families in which one adult or child has a disability.

**Permanent Housing – Housing Only:** permanent housing without supportive services.

## **20. How should projects serving clients who are at risk of homelessness be set up in HMIS?**

The only project type serving clients who are at risk of homelessness (i.e., where homelessness is not an eligibility requirement) that should be set up as a continuum project is Homelessness Prevention (HP).

**Homelessness Prevention** is defined as follows: A project that offers services and/or financial assistance necessary to prevent a person from moving into an emergency shelter or place not meant for human habitation.

Other project types (e.g., Permanent Housing Only, Permanent Housing with Services, Other) serving clients who are at risk of homelessness should be designated as non-continuum projects. Non-continuum projects should still be set up with the project type that best reflects their service model.

## **21. If grantees have one funding source that is used to provide funding to multiple types of projects, do two projects need to be set up with different project types?**

Yes. If grantees are using the same program funding for multiple types of projects, for example, emergency shelter (e.g., motel stay) and permanent housing, they would need to be set up as two separate projects with two different project types.

## **22. Should a separate project be set up in HMIS for each subgrantee or contracted provider of a program?**

Grantees are responsible for ensuring compliance for their subgrantees and contracted providers. Cal ICH recommends that grantees that are creating new projects in HMIS create separate projects in HMIS for each subgrantee. For example, if there are two subgrantees or contracted providers that both offer Rapid Rehousing (RRH) with HHAP funding, the projects in HMIS would be: (1) Provider 1: RRH-HHAP, and (2) Provider 2: RRH-HHAP. This will allow grantees to monitor AB 977 compliance for each organization operating their program. Please see the relevant agency Project Setup Instructions for additional information. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

### **23. Is a bed the same as a bedroom?**

Not necessarily. Bed is to persons as unit is to households. The number of beds in a project should be determined by how many people it has the capacity to serve (on average). So, if it is all one-bedroom units serving single people, the number of beds would be the same as the number of bedrooms. But if the project has an average occupancy of two people per bedroom, the bed count would be twice the number of bedrooms. More likely it's somewhere in between. The number of beds can be calculated based on the average household size. So, if a project has 10 units and the average household size is three, the project will have 30 beds, even if there are only 20 bedrooms.

Per the [FY 2024 HMIS Data Standards Manual](#), projects that do not operate with a fixed number of beds or units that “provide housing rental assistance and have a fixed number of vouchers should determine the number of beds and units based on the number of vouchers currently funded and available for use. Projects that provide emergency shelter or housing rental assistance vouchers and without a fixed number of units or vouchers (e.g., Emergency Shelter hotel/motel project, Rapid Re- Housing, some scattered site Permanent Supportive Housing) should determine the number of beds (and units) based on the maximum number of persons (and households) who can be housed on a given night.”

### **24. If a grantee needs to set up new projects to align with updated project setup guidance, do they need to transfer existing client records into the new projects or only enter client data for enrollments that occur after the new projects were set up?**

Any active client (new or existing) is required to be entered into the “new” project at the time the new project is set up for the purposes of AB 977 compliance.

Grantees should work with their local HMIS Lead to ensure that client records are handled in a way that will minimize impact on reporting. Generally, the preferred approach is for the HMIS Lead to facilitate a complete transfer of the client record from the “old” project to the “new” project.

Historical records for clients that have already been exited from the old project at the time of the new project setup date would not need to be transferred to the new project, unless the organization wants complete historical records for reporting purposes. Cal ICH encourages grantees to migrate data back to January 1, 2023, when feasible and appropriate based on program and project start date.

### **25. What does it mean for a client to be active?**

Active refers to a client being enrolled in the project (has a project start date) and not yet exited from the project (does not have a project exit date). All clients who are currently being served in a project, regardless of whether they entered the project last week or 10 years ago, need to be entered whenever the project is set up.

### **26. Will grantees need to enter all existing clients who are actively enrolled in a funded project on the date the project is set up in HMIS?**

Yes, grantees will be required to enter existing clients who are actively enrolled in a project on the date that the project is set up to ensure accurate data on how many people are being served by state homelessness programs. All project-level and client-level data should reflect actual project start dates if different than the date the project is set up in HMIS. Cal ICH recognizes that grantees may be unable to complete certain Common Data Elements (CDEs) for existing clients who entered the project in prior years. Grantees should consult their agency's HMIS Project Setup Instructions for more details on which

CDEs are required to be collected and at which data collection stage. Grantees who need assistance can email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**27. What is the difference between the project operating start date and the client project start date?**

The project operating start date is tied to the project and is the date the project began providing services and/or housing. This should match the date the first client was served in the project and can be in the future if the project has not yet started serving clients. The client project start date is tied to the client and is the date the client started receiving services from the project. The client project start date cannot be earlier than the project operating start date.

**28. Can grantees or entities have closed HMIS projects set up to protect client privacy?**

Yes, grantees can use a closed HMIS project set up when necessary to protect client privacy or as required by local HMIS configuration. Data must be included in the quarterly data uploads to the state's Homelessness Data Integration System (HDIS). The local HMIS Lead and CoC Leadership manage the Privacy Notices and policies and procedures for client data privacy and security in the local HMIS. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com). There may be specific cases where grantees and/or subgrantees are considered Victim Service Providers (VSPs) and are therefore prohibited from participating in HMIS. Cal ICH and/or the Abt TA team will address these questions on a case-by-case basis.

**29. Can clients decline to have their information entered into HMIS?**

[Per a question received by HUD from their Ask a Question \(AAQ\) desk](#) and published on HUD Exchange, "An individual or family can refuse to participate in HMIS, and the provider must still offer all the same services to the household. However, some information may be required by projects to determine eligibility for housing or services, or to assess needed services."

**30. Is there standardized language for release of information (ROI) documents or client-facing documents about privacy and consent?**

HUD does not require ROIs, but some CoCs may choose to use ROIs. HMIS users should consult with the local HMIS Lead about the CoC's policies. There is no expectation that HMIS users will develop their own HMIS privacy policies. These should already be available on the local CoC's website as part of an onboarding package for HMIS, or through a direct request to the CoC's HMIS Lead. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**31. Can a participant use an alias if they do not want to be identified in HMIS?**

Per the [HMIS Data Standards Manual](#), "HMIS records should use a client's full and accurate name whenever possible. If the client doesn't associate with their legal name, the name entered into HMIS should reflect the name the client identifies with, unless legal name is required by the funder." There is a Name Data Quality field in HMIS that may be used by CoCs to document that the name recorded is a name other than the full and accurate name. Grantees should select the "Partial, street name, or code name reported" response to indicate that a client provided a place holder name such as a street name or code name for street outreach clients or a name modification made for security reasons. However, grantees should select "Client prefers not to answer", rather than "Partial, street name, or code name reported" if a false name/made up name was entered to create a record in the system solely because

the client prefers not to answer or tell staff their name. Please refer to pgs. 47-48 in the [HMIS Data Standards Manual](#).

CoCs may or may not have specific guidance or restrictions around entering aliases in any field that is expecting accurate and complete data as using these response values can have an impact on the CoC's data quality.

**32. Is there a way for a grantee to get a list of clients that have been entered into HMIS to ensure compliance with AB 977?**

Grantees should work with their service providers or subcontractors who are entering data into HMIS to ensure client information is being entered into HMIS. HMIS users can also work with the local HMIS Lead to ensure data are being entered into HMIS correctly. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**33. Do grantees receive verification or reports to ensure projects are properly set up in HMIS?**

Grantees will not receive verification from Cal ICH when projects are set up in HMIS. Grantees should communicate with their HMIS Lead to confirm projects are set up and clients are being entered accurately. Cal ICH will monitor compliance through reports from California's [Homeless Data Integration System \(HDIS\)](#), a state data warehouse that aggregates data from local HMIS systems. Abt will provide TA in coordination with HMIS Leads to address compliance and data quality issues.

**34. Is there a deadline for when grantees need to enter data on an ongoing basis?**

Data should be entered in a timely manner in alignment with CoC policies and HMIS best practices. Cal ICH will be verifying data after receipt of quarterly data uploads. All data should be entered by the time the quarterly upload is provided to Cal ICH. Grantees should confirm with their CoC the deadline for data to be captured in that upload.

**35. How should data be entered for clients who are served by both Emergency Shelter (ES) and Rapid Rehousing (RRH) projects?**

For clients who are provided with Emergency Shelter (ES) at the same time as enrolling in a Rapid Rehousing (RRH) project, they would enroll (receive a project start date) in HMIS to both the ES and RRH concurrently. Once the client moves into housing with the assistance of RRH, they would be *exited* from the ES project. In the RRH project, the client would receive a "Housing Move-in Date" on the date they move into permanent housing. The client would remain enrolled in the RRH project as long as they are receiving rental assistance and/or services, including case management, from the RRH project. The client is considered permanently housed after their "Housing Move-in Date." This remains true even if there is only one funding source for the two different project types.

**36. How should data be entered for clients who are served by both Homelessness Prevention (HP) and either permanent housing or shelter/temporary housing projects?**

Clients should not be enrolled in a Homelessness Prevention (HP) project at the same time as a permanent housing or shelter/temporary housing project. HP projects are meant to serve clients at risk of experiencing homelessness, while permanent housing and shelter/temporary housing projects are meant to serve people experiencing homelessness. If clients lose their permanent housing, clients should be exited from HP projects. If clients are then enrolled in permanent housing and/or shelter/temporary housing projects that receive AB 977 funding, or other funding that requires HMIS

data entry, the clients would be enrolled in the appropriate HMIS project with a start date that matches the first date they received housing or services.

**37. Can a client be enrolled in two different RRH projects at the same time?**

There is nothing in the HUD guidance preventing the enrollment of one person into two PH projects at the same time. In some cases, it may cause reporting issues for the CoC when it submits reports to HUD, the federal partners, and/or to the state when it appears that clients are active and residing in more than one housing project and the bed inventory is duplicated. As long as the two programs are collaborating well to ensure that the client/household is not receiving duplicate services, then that type of dual enrollment is acceptable. Reporting issues can be explained via the note sections of the various reports. Please continue to reference HUD guidance ([HMIS Dual Enrollment and HIC Duplicate Inventory Training Resource](#)) and work with the HMIS Lead for information around this topic.

**38. Are grantees required to enter every Common Data Element (CDE) and Federal Partner Data Element W5 – Housing Assessment at Exit for all project types?**

Grantees must collect and enter the Universal and Common Data Elements in accordance with HUD's [HMIS Data Dictionary](#), which specifies the applicability of each data element in terms of project type and who the data should be collected about. Grantees should collect and enter data appropriate to that project type. For example, a "Rapid Rehousing Project" would not be required to enter "Emergency Shelter Bed Night." HUD also requires certain additional data elements, known as Federal Partner Program Elements, for certain federal programs. Federal Partner Data Element W5 is required for projects that receive funding from the HUD: Housing Opportunities for Persons with AIDS (HOPWA) program for all project types, or from the HUD: Emergency Solutions Grant (ESG) or HUD: Continuum of Care (CoC) programs for Homelessness Prevention projects.

**39. For projects where only some of the clients served are experiencing homelessness, which clients should be entered?**

Client data should be entered for all units that are restricted to serving the target population of people who are experiencing or at risk of homelessness.

**40. Are HMIS entries required for clients who receive one-time assistance?**

Yes, clients who receive one-time assistance should still be entered into HMIS.

**41. Will training be provided on the specific HMIS software used within a CoC?**

Yes, HMIS Leads will provide instructions and train users on their CoC's HMIS software.

**42. What should the project's Operating Start Date be if a grantee was using funding before the project was set up in HMIS?**

The project's Operating Start Date in HMIS should reflect the actual date the project began serving clients, even if that date precedes the date on which the project was created in HMIS.

**43. Is there a timeframe in which data needs to be entered after someone enters a project?**

Data should be entered on a consistent basis and in a timely manner in alignment with CoC policies and HMIS best practices. Cal ICH will be verifying data after receipt of quarterly State HDIS data uploads. All data should be entered by the time the quarterly upload is provided to Cal ICH. Grantees should confirm with their CoC the deadline for data to be captured in that upload.

**44. Are there only three times that a grantee will need to enter data for a client: 1) at client project start, 2) at housing move-in, and 3) at client project exit?**

No, there are different times and intervals that data should be entered for a client. Data collection and entry points depend on the client and project type and can include record creation, project start, update, annual assessment, move-in occurrence date, and project exit. Please see Appendix B in the [AB 977 HMIS Project Setup Instructions](#) for more information.

**45. Should a separate project be set up in HMIS for each subgrantee of a program? What if subgrantees are serving the clients concurrently?**

Grantees are responsible for ensuring HMIS compliance for their subgrantees and contracted providers. BHBH does not require separate projects for each subgrantee. Projects should be set up in a way that does not duplicate clients and services across projects. Grantees can work with the local HMIS Lead and the Abt TA team to determine how to best set up projects. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobel.com](mailto:AB977_TA@abtglobel.com).

**46. What should the project's Operating Start Date be if a grantee was using program funding before the project was set up in HMIS?**

The project's Operating Start Date in HMIS should reflect the actual date the project began serving clients, even if that date precedes the date on which the project was created in HMIS.

**47. Is it possible to change the number of dedicated beds after initial project setup?**

Yes, bed inventory can be updated at any time and should be updated when significant changes occur, including changes to the total number of beds and/or units, the number of beds dedicated to each household type (Adult without Children, Adults with Children, Child Only), or the number of beds dedicated to the following populations: Veterans, Youth (under 25 years old), and/or Chronically Homeless.

## **Questions About Funding, Other Funder Codes, and Grant IDs**

**48. Will Cal ICH have a protocol for identifying state funding sources?**

Yes, Cal ICH has developed a convention to identify state funding sources that are used to fund projects in HMIS. Cal ICH will use the HMIS fields in the Funding Sources data element ('Funding Program' other funder field and 'Grant ID') to identify projects funded by state homelessness programs identified in AB 977. The funding codes and grant IDs that should be entered into the open text fields are provided in the Project Setup Instructions for each agency. Program and grantee-specific identifiers are also provided in these documents to enter in the 'Grant ID' field for each funding source entered.

**49. How do grantees enter data for multiple grants funding the same project(s)?**

Grantees are required to enter funding information as specified by Cal ICH and any information as required by other funders, including HUD and the HMIS Federal Partners. Grantees can link multiple funding sources to one project. Each funding source can have its own period of performance identified with grant start and end dates. All clients enrolled in a project during a funding source's period of performance will be counted in funding-source specific reports generated from HDIS for the purposes of AB 977 compliance.

**50. For HMIS projects that are funded with multiple funding sources throughout the year, a few months at a time, is HMIS able to track the individual funding timelines if the project never ends? For example, if a report is run for program funding from Jan 2021 - Dec 2022 will the report only pull the data for the specific months the project was funded?**

When the funding code and the grant identifier are entered into HMIS, there is also a space to enter the grant start date. There are dates around when funding rounds occur, and every program is a little different regarding its rounds, contracts, or allocations. Grantees should enter the grant start date (and end date if the grant funding has ended). For nuances of entering funding information and running reports in specific HMIS software, please reach out to the local HMIS Lead. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**51. Are there any protocols if there is an interruption in funding resulting in no clients enrolled in a specific project(s) for a period of time? Should grantees create a new project (with a new funding source record) once clients are served again?**

There are many ways to handle an “interruption” in funding depending on the project reporting needs, and most do not involve starting and stopping whole projects, but rather updating the funding sources tied to the projects as needed. If project operations are paused, the grantee should work with the HMIS lead to determine how to address associated bed/unit inventory records and to ensure any active clients are exited from the project if they are no longer being served during the project hiatus. However, if clients are still being served with other funding, the project must remain open, and an end date must be entered for the funding source. The Abt TA team is available to provide project-specific guidance as needed.

**52. How should funding sources be set up in HMIS if projects receive funding from non-AB 977 programs?**

If a project is already receiving funding from a source not listed in AB 977, the AB 977 program’s funding codes should be added to the existing HMIS project. No changes need to be made to the client records. Grantees *should not* create a new project for each funding source. Grantees should consult their other funders to ensure they are in compliance with their other programs’ HMIS requirements. Grantees can also work with their HMIS Lead as needed to ensure their projects have the correct non-AB 977 funding program information entered correctly.

If funding for a program included in AB 977 has ended, but the project will continue operating, a funding end date should be entered for the identified program and the other funding should be left as active (i.e., no end date entered).

**53. What should the grant start date be if the grantee has already been using the program’s funds for the project prior to setting up the project in HMIS?**

The grant start date in HMIS should reflect the actual date the project first received that program funding, such as execution of a contract, release of a County Fiscal Letter, or other means of formal receipt of funding.

## Questions That Apply to California Interagency Council on Homelessness (Cal ICH) Programs

### Questions About Which Programs and Grantees Need to Comply With AB 977

#### **54. Do the requirements of AB 977 apply to tribal grantees of Cal ICH programs?**

AB 977 does not require tribal grantees to enter data into HMIS because tribes are considered sovereign entities with their own land and programs and do not currently have their own local HMIS. However, given the breadth of programs funded through the State, an entity administering homelessness funding may separately require their grantees to enter data into HMIS. In those scenarios, tribal entities will need to engage with the entity administering their funding to determine what program-specific data entry requirements must be followed. Cal ICH does not currently require their tribal grantees to report data to Cal ICH or enter data into HMIS. Even though AB 977 does not require tribal grantees to enter data into HMIS, the Abt TA team will provide TA to those tribal grantees that want to enter data into HMIS.

### Questions About Project Setup and Ongoing Client-Level Data Entry

#### **55. Will grantees receive notice from Cal ICH about their AB 977 compliance after the quarterly data has been reviewed?**

Cal ICH is working with Abt to develop data quality reports that will be provided to grantees so grantees can ensure they are in compliance with AB 977. Cal ICH will be offering technical assistance and resources to support grantees in using these reports to improve data quality. Cal ICH will provide additional information to grantees about these reports after Cal ICH has processed the quarterly data uploads. Grantees can reach out to their HMIS lead to confirm projects are set up and clients are being entered accurately prior to Cal ICH's receipt of quarterly data.

### Questions About Funding, Other Funder Codes, and Grant IDs

#### **56. What should Cal ICH grantees enter into the Other Funder text box and Grant Identifier fields in HMIS?**

Information on what to enter in the Other Funder text box and the Grant Identifier fields in HMIS is provided in the *Funding Sources* section and *Table 3* in the Cal ICH Grantee Project Setup Instructions and the Project Setup Instructions for HMIS Leads. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

#### **57. What contract numbers should Cal ICH grantees who receive multiple disbursements of funding for the same grant use in the Grant ID field in HMIS?**

When grantees receive multiple disbursements of funds as part of a single round of a Cal ICH grant program (ex: HHAP 3), grantees may continue using the first contract number in that program's round when creating the Grant ID (i.e., may continue to use the contract number from the HHAP 3 Initial Disbursement).

**58. If a City, County, or CoC applied for HHAP through a joint application or there was a redirection of funds, which Grantee ID should be used?**

The Grant ID should use the Grantee ID for the jurisdiction applying on behalf of the joint applicants or the jurisdiction receiving the redirected funds.

**59. If a project receives funds that originate from two different HHAP grantees (e.g., a County and a CoC), which Grantee ID should be used?**

In HMIS, the project should have two different Grant IDs reflecting the Grantee IDs for each HHAP grantee and their respective contract numbers. Grantees should enter the HHAP funding code twice with the two different Grantee IDs.

**60. Can multiple rounds of HHAP funds be used for the same HMIS project or do two projects need to be set up, one for each funding source?**

Multiple funding sources can be connected to a single project – the grantee just needs to make sure that they enter other funder text and grant identifiers separately for each round.

**Questions for ERF Grantees (ERF-2-R, ERF-3-L, and future rounds)**

**61. What are the differences in project set up requirements between ERF-1/2-L and ERF-2-R/3-L?**

As described in the [AB 977 HMIS Project Setup Instructions for Cal ICH Grantees](#), starting with ERF-2-R, HMIS projects for ERF must be set up in a way that allows Cal ICH to unequivocally identify in HDIS all the served clients from each of the designated encampment(s) served by ERF-funded client services/activities. ERF-2-R and later rounds must ensure that, for each encampment site, at least one HMIS project (or multiple projects when combined) used for ERF-funded services/activities is both (1) exclusive to only clients from the ERF-designated encampment (i.e., clients who are not from the designated encampment are not also included in that HMIS project) and (2) comprehensive of all the clients from the designated encampment who are served by ERF-funded client services/activities. ERF-1 and -2-L are not obligated to adopt this specific project setup, but grantees can choose to follow the same project setup for earlier rounds if they prefer.

**62. If new clients enter an ERF-funded project right before the end of the ERF reporting period, and therefore will not have had the chance to experience much of the intervention, how should grantees represent that in HMIS?**

Clients are entered the same way regardless of when they entered the project. The clients' project start dates should reflect when they started receiving ERF-funded services from the project. This will show that they started receiving ERF-funded services toward the end of the reporting period.

**63. A grantee plans to use funds from ERF-2-R/3-L in conjunction with other funds to carry out their planned services at the encampment they designated in their ERF application. How should their ERF projects be set up in HMIS to account for these multiple funding streams?**

Projects in HMIS can have more than one funding program. The HMIS projects will have multiple funder codes/grant IDs associated with them. For example, if a grantee is using both ERF-3-L and HUD's Emergency Solutions Grant (ESG) programs to fund a single street outreach service program at an

encampment they designated in their ERF-3-L application, both ERF-3-L and ESG should be added as funding programs for the one Street Outreach project in HMIS. HMIS projects for activities funded by ERF-2-R, 3-L, and future rounds must meet the following criteria:

- 1) **Exclusive** to only served clients that resided in the designated encampment (i.e., only clients from that encampment who got served by ERF-funded services are enrolled in the project),
- 2) **Comprehensive** of all the clients from the designated encampment who got served by ERF-funded services, and
- 3) **Specific to a single encampment** (i.e., projects are exclusive and comprehensive for a single encampment designated in the grantee's ERF funding application – not multiple designated encampments).

If the other funding sources require the grantee to report into HMIS and are funding activities that serve clients from outside the encampment(s) designated in the grantee's ERF application, then the served clients from outside the encampment(s) must be enrolled in separate projects than the ones set up exclusively for clients from the designated encampment(s). Grantees should confirm with their other funders what the HMIS reporting requirements are for their programs.

**64. For clients served by services funded by ERF-2-R/3-L, what constitutes being “from the encampment designated in the ERF funding application”?**

For the purposes of reporting, a served client is “from the designated encampment” if they resided in the encampment on or after the grantee's ERF grant start date.

**65. If an ERF grantee provides services to multiple encampment sites within a larger project area, can the project area be treated as a single designated encampment when entering into HMIS or should all encampment sites be entered separately?**

Grantees should set up HMIS projects consistent with how the encampment(s) and their proposed interventions were described in their ERF-2-R or 3-L applications. For the purposes of HMIS project setup and ERF reporting, multiple sites that share the same needs, resources, and housing strategies can be considered a single encampment. If a grantee is serving an area that includes sites that have different needs and are served by different strategies and interventions, those should be considered separate encampments and set up as separate HMIS projects.

**66. If a grantee is working with multiple encampments and therefore has multiple HMIS projects (one for each encampment) and a client moves from one encampment to another, how should that be addressed in HMIS?**

If a client moves from one encampment designated in the grantee's ERF funding application (“Encampment 1”) to another designated encampment (“Encampment 2”), they should be exited from the Encampment 1 street outreach project (with a project exit date the day they moved out of Encampment 1) and then enrolled in the Encampment 2 street outreach project (with a project start date on the day they moved into Encampment 2). If they are later placed into another project type (e.g., Emergency Shelter, Permanent Supportive Housing, Services Only) from the second encampment, they should be enrolled in the project that was set up for clients from Encampment 2.

**67. The grantee is serving multiple encampment sites where many of the residents of each frequently move between the various sites. How should the clients be enrolled in HMIS given how frequently they would need to be exited from one project and (re-)enrolled into another?**

If residents move so frequently between the sites, then the grantee should consider if the sites are truly separate encampments with different needs that should be served by different strategies and interventions or if the various sites share the same needs, resources, and housing strategies in light of the fact that, on any given night, many of the same people could be residing at any of the sites. Depending on what the grantee wrote in their ERF funding application regarding the needs of the sites, the grantee could treat these various sites as just one single encampment during reporting.

**68. If an encampment site has clients that are being served by other projects, how should they be entered in HMIS?**

[In some circumstances](#), clients in HMIS can be enrolled in more than one project (referred to as “dual enrollments”) at the same time, depending on the types of projects involved. For example, clients can be dually enrolled in Services Only and residential project types because Services Only projects are not residential, and the client will not appear to be residing in two different units at the same time. Another example of allowable dual enrollments are clients simultaneously enrolled in Emergency Shelter and permanent housing projects *before* they receive a Housing Move-in Date in the permanent housing project.

Dual enrollments in situations where a client would be assumed to be residing in two different residential projects at the same time are considered physically impossible, e.g., a client cannot be simultaneously enrolled in both ES and TH projects simultaneously. If clients who receive ERF-funded services are enrolled in other projects in HMIS, grantees should work with their HMIS Leads to ensure correct project setup to avoid impossible dual enrollments.

**69. ERF-2-R/3-L funding is being used for interim and permanent housing for clients from an encampment while other funding resources are being leveraged for street outreach services in the encampment. Does an ERF-exclusive Street Outreach project need to be set up in HMIS even though ERF-2-R/3-L is not funding street outreach services?**

No, an ERF-exclusive Street Outreach project does not need to be set up in HMIS if ERF is not funding street outreach services at the encampment. Grantees should set up ERF-exclusive projects that align with the shelter, housing, and/or services being funded by the ERF program. Grantees should confirm with their other funders if they have HMIS requirements.

**70. Can clients from two different designated encampments be enrolled in one emergency shelter project in HMIS?**

No, each ERF-2-R or 3-L-funded Emergency Shelter must enroll clients from a single designated encampment. In other words, each Emergency Shelter project must be specific to a single encampment designated in the grantee’s ERF funding application. For example, if ERF funds are being used for an Emergency Shelter for clients from Encampment 1 and Encampment 2, the grantee must set up two separate Emergency Shelter projects, as follows:

1. Encampment 1 Emergency Shelter
2. Encampment 2 Emergency Shelter

**71. The grantee is partnering with a separate jurisdiction to serve different areas of the one encampment designated in their ERF-2-R/3-L funding application. Can the grantee set up two separate projects in HMIS dedicated to specific areas in the encampment, or do they have to have one single project for this encampment?**

Grantees can set up separate projects in HMIS for one encampment as long as, taken together, all clients in the encampment are entered into those projects. For example, if a grantee contracts with two different service providers to provide outreach services to one encampment, they can set up two separate street outreach projects to track their clients separately as long as all served clients in the encampment are enrolled in one of the two projects. The same setup can be used by grantees that partner with other jurisdictions to serve the encampment.

1. Provider 1 – Street Outreach Project 1
2. Provider 2 – Street Outreach Project 2

**72. A client being served at an Emergency Shelter did not come directly from the ERF-designated encampment – they left the encampment to reside elsewhere and then subsequently got served at the Emergency Shelter. How should this client be enrolled in HMIS?**

Grantees using ERF-2-R/3-L funding for direct services that necessitate entering the clients' data into HMIS should screen the clients to determine if they resided in the encampment designated in their ERF funding application at any point after the ERF grant start date. For example, clients could be asked "Did you reside in [Encampment 1] on or after [grant start date]?". For clients that cannot answer that question, grantees can use the client's enrollment in prior ERF-2-R/3-L-funded HMIS projects as a method to determine if the client did indeed reside in the ERF-designated encampment during the grant lifetime. For clients that are determined to have resided in the ERF-designated encampment during the grant lifetime, they should be enrolled in Emergency Shelter HMIS project that corresponds with the encampment that they resided in most recently.

**73. A grantee received funding from ERF-1 and/or 2-L to provide services to the same encampment that was designated in the ERF-2-R/3-L application. Can they simply use the existing HMIS projects that were set up for ERF-1 and/or 2-L or must they set up new projects for ERF-2-R/3-L?**

The grantee can use the existing HMIS projects if those projects meet the standards for project setup for ERF-2-R/3-L (i.e., 1. exclusivity: the projects are exclusive to only clients from the designated encampment who got served by ERF-funded activities; 2. comprehensiveness: the projects are comprehensive of everyone from the encampment who got served by ERF-funded activities; and 3. site-specificity: the projects are specific to a single designated encampment). In the case that the existing projects already meet the exclusivity, comprehensiveness, and site-specificity requirements, the grantee would simply need to add the ERF-2-R/3-L Other Funder Code and Grant ID to the existing HMIS projects that the ERF-2-R/3-L grant is funding in order to become compliant with the reporting requirements for ERF-2-R/3-L. If the ERF-2-R/3-L money is funding additional or different activities than what ERF-1/2-L funded, then the grantee will need to set up new HMIS projects that properly meet the three setup requirements to encompass those new activities.

**74. If a client exits an encampment but remains unhoused, should they be exited from the ERF-specific Street Outreach project?**

Clients should not be exited from an ERF-specific Street Outreach project if they move to a different unsheltered location and are still receiving ERF-funded outreach services. If the client is no longer receiving ERF-funded street outreach services, they should be exited from the ERF-specific Street Outreach project and enrolled in other HMIS projects, if applicable and required by the non-ERF program's funders.

**75. If clients are receiving ERF-funded street outreach services as well as services funded by another program, can they be enrolled in two different Street Outreach projects simultaneously?**

Dual enrollments in non-residential projects, including Street Outreach, are allowable. With dual street outreach enrollments, grantees should ensure that data is entered consistently across both projects so that data does not conflict (e.g., if a client exits homelessness to a permanent housing destination, that should be reflected in the exit destination field for both Street Outreach project enrollments).

## Questions That Apply to California Department of Social Services (CDSS)

### Questions About Which Programs and Grantees Need to Comply With AB 977

**76. Do the requirements of AB 977 apply to tribal grantees of CDSS programs?**

In accordance with Cal ICH AB 977 guidance, CDSS is not requiring tribal grantees to comply with AB 977 requirements at this time. However, technical assistance is available to those tribal grantees that want to enter data into HMIS.

**77. Do CDSS projects need to be set up in HMIS if they do not have any beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness?**

No, only projects with beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness need to be set up in HMIS. If a project receives funding from a program included in AB 977, but does not meet these criteria, the grantee should email the Abt TA team at AB977\_TA@abtglobal.com to determine if HMIS is required and so Abt can update their records.

**78. The Project Setup Instructions say that Victim Service Providers (VSPs) are prohibited from participating in HMIS. Does that include Adult Protective Services (APS)?**

No, Adult Protective Services (APS) is not included in the Victim Service Provider (VSP) restriction. A VSP is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, domestic violence shelter and transitional housing programs, and other programs. A VSP is a designation at the agency level, not the project level.

VSPs are prohibited from entering client data into HMIS. This includes those agencies who meet the definition above and those who receive funds through the U.S. Department of Health and Human Services (HHS) Family Violence Prevention and Services Act (FVPSA), the U.S. Department of Justice (DOJ) Office of Victims of Crime (OVC), or DOJ Office of Violence against Women (OVW), and who use those funds to help support projects serving survivors of domestic violence, dating violence, sexual assault, or stalking. For more information regarding setting up “closed” or “private” projects in HMIS, please refer to [this question](#).

**79. Are Home Safe clients required to be entered into HMIS? And does this include entering data for historical clients or only new clients?**

Home Safe grantees are not currently required to enter data into HMIS under AB 977; however, per the [All County Welfare Director’s Letter Dated October 15, 2021](#), CDSS does require Home Safe grantees to enter data into HMIS. There is not currently a deadline for Home Safe grantees to enter data into HMIS. Once grantees enter data into the HMIS they only need to enter data for active cases (i.e., do not need to enter historical cases).

**80. Does the term “homeless” in the context of AB 977 have the same definition as HUD’s definition/categories 1, 2, 3, and 4?**

Yes, the terms “homeless” or “experiencing homelessness” in AB 977-related materials refer to an individual or family who falls under the definition of homelessness pursuant to the HUD definition of Homelessness in [24 CFR section 91.5 under “Homeless” Sections \(1\)-\(4\)](#). Note that there are some

nuances regarding the definitions of at-risk of homelessness for eligibility for CDSS programs. Please consult the program's definition of at-risk of homelessness.

## Questions About Project Setup and Ongoing Client-Level Data Entry

**81. If a CDSS-funded grantee provides rapid rehousing, assists with motels, and provides homelessness prevention, does there need to be a separate HMIS project for each type?**

Yes. If the program offers these services (rapid rehousing, emergency shelter, and prevention services) using CDSS program funding, then three separate projects need to be set up with the appropriate project type assigned to each one.

**82. What are the rules around the HMIS data entry requirements for Bringing Families Home (BFH) families and AB 977, specifically around HIV/AIDS status.**

There is no universal rule about HIV data collection. The CoC's privacy notice dictates what can and cannot be collected/used in the local HMIS. For concerns about sharing client data with other HMIS participating organizations in the CoC, please refer to [this section of questions](#) regarding HIPAA and setting up "closed" or "private" projects in HMIS.

**83. For Bringing Families Home (BFH) projects, should grantees enter children into HMIS who are not residing with the biological parent in the BFH project (e.g., the family is engaged in family reunification and the child is in out-of-home care)?**

The following is based on HUD's guidance on household enrollments and project start dates in the [FY 2024 HMIS Data Standards Manual](#):

For residential projects, household enrollments should only include family members who are currently living with the household in the project unit. Project start dates for each family member should reflect the actual dates they are staying in the project. Generally, children that are not currently living with the family should not be enrolled with a project start date if and until they are reunited with the family.

Note that project start dates are used to calculate the length of time people experience homelessness, so enrolling a child while they are placed with a foster family or in care elsewhere would count that time as time the child was experiencing homelessness.

For non-residential projects (Street Outreach, Services Only) or enrollments in residential projects before being housed (Rapid Re-Housing project before move-in date), enrollments should only include family members who would be living with the household if they were housed or in shelter. Generally, children placed with a foster family or in care elsewhere would not be included in this consideration. Please reach out to the AB977\_TA@abtglobal.com inbox with any nuanced situations related to this guidance.

**Relationship to Head of Household:** A household is a single individual or a group of persons who apply together to a continuum project for assistance and who live together in one dwelling unit, or, for persons who are not housed, who would live together in one dwelling unit if they were housed. **Project**

**Start Date:** Data Collection Instruction: Record the month, day, and year of each client's project start.

The 'Project Start Date' indicates a client is now being assisted by the project. Each individual client in a household will have their own 'Project Start Date.' If a new client is added to a household

after the original household members' start dates, the new client's start date should reflect the actual day that client started the project.

## **Questions About Funding, Other Funder Codes, and Grant IDs**

### **84. Are there HMIS funder code and grant IDs for other core services (i.e., CalWORKs and CalFresh) that are required by CDSS programs?**

Beyond the CalWORKs Housing Support Program (HSP), other CalWORKs and CalFresh programs are not covered by AB 977 and thus do not have assigned funding codes. Funding codes have only been provided for programs impacted by AB 977.

### **85. For CDSS programs, is the 2-digit number after the grant identifier the county code or some other number?**

Yes, it's the county code, which is the same code used in other CDSS reporting. The county code can be found in the CDSS Grantee Project Setup Instructions and the Project Setup Instructions for HMIS Leads. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

### **86. If a county is applying two rounds of the same CDSS funding source to a project, should these be added as two different funding sources?**

Both rounds should be added as a single funding source. For all CDSS programs the funding code should be the program acronym (e.g., BFH) followed by the county code (which is the same across all CDSS programs). This information is also in the CDSS Project Setup Instructions document—a link to the most up-to-date version of this document can be found in the [Introduction](#) section of this document. This is the same for all years or rounds that the project received funding. For the grant start date, enter the start date of the project in HMIS or the first date of client enrollment in the CDSS-funded program's HMIS project. The grant end date should be left blank until the project no longer receives funding from the program.

## Questions That Apply to California Department of Housing and Community Development (HCD) Programs

### Questions About Which Programs and Grantees Need to Comply With AB 977

**87. Do the requirements of AB 977 apply to tribal grantees of HCD programs?**

In accordance with Cal ICH AB 977 guidance, California Department of Housing and Community Development (HCD) is not requiring tribal recipients to enter data into HMIS at this time because tribes are considered sovereign entities and do not have their own local HMIS. However, technical assistance is available to those tribal recipients that want to enter data into HMIS.

**88. Do HCD projects need to be set up in HMIS if they do not have any beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness?**

No, only projects with beds or services dedicated to people experiencing homelessness or at risk of experiencing homelessness need to be set up in HMIS. If a project receives funding from a program included in AB 977, but does not meet these criteria, the grantee should email the Abt TA team at AB977\_TA@abtglobal.com to determine if HMIS is required and so Abt can update their records.

**89. Are HOME and Community Development Block Grant (CDBG) funded programs required to enter data into HMIS?**

HOME and CDBG are not subject to the reporting requirements of AB 977. HOME and CDBG are funded by the Department of Housing and Urban Development (HUD) and grantees should refer to HUD's HMIS reporting requirements.

**90. Are grantees required to enter data for projects that received state funding from one of the programs listed in AB 977 if the funding was first disbursed more than 10 years ago?**

Yes. As long as the project is still in operation, the project needs to be set up in HMIS. Data should be entered for active clients, as well as new clients after project set up. For older projects, there is lenience on the Common Data Elements (CDEs) that need to be entered for clients that enrolled in the project before it was set up in HMIS, but CDEs must be collected at project start for all clients who enter the project on or after July 1, 2023, or if the project is set up in HMIS before July 1, 2023. All project information should be entered into HMIS as accurately as possible, i.e., funding and project start date being in the early 2000s.

**91. Are HCD grantees who are developers responsible for AB 977 reporting requirements?**

The grantee (i.e., recipient of state funds) is responsible for ensuring AB 977 compliance. However, there are many different options for achieving compliance that can involve the developer, service providers (or other providers), and/or HMIS Lead. It is up to the grantee to determine who should be providing and entering information into HMIS. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977\_TA@abtglobal.com. If there are additional people who should be aware of office hours, training, and other outreach communications, please email the names, contact information, and relevant projects to AB977\_TA@abtglobal.com.

**92. Which Multifamily Housing Program projects are required to comply with AB 977?**

The Multifamily Housing Program (MHP) is identified in AB 977 as one of the state homelessness programs that must report data in HMIS. All MHP projects that have special needs units restricted to serving people experiencing homelessness must comply with the requirements of AB 977.

MHP projects that do not have units restricted to serving people at risk of homelessness or experiencing homelessness are not required to enter data into HMIS. If MHP projects without units restricted to people at risk of or experiencing homelessness choose to enter data into HMIS, they must be set up as non-Continuum projects.

**Questions About Project Setup and Ongoing Client-Level Data Entry**

**93. Can a project funded by Homekey be set up as an Emergency Shelter (ES) – Entry Exit, Emergency Shelter – Night-by-Night, or Transitional Housing (TH) in HMIS?**

Projects should be set up in accordance with the HMIS project type that most closely aligns with the project activities. Grantees can work with their HMIS Lead and the Abt TA team to identify the project type appropriate to their specific circumstances. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com). Grantees with questions about whether their project conforms with the eligible uses of their funding program should consult with the appropriate state agency.

**Questions About Funding, Other Funder Codes, and Grant IDs**

**94. If a county uses NPLH capital funding (with no ongoing funding) for specific units in a permanent housing project dedicated to people experiencing homelessness, do clients in all units in the building need to be entered into HMIS, including those in units that were not funded by NPLH?**

Only units paid for by NPLH capital funding that are dedicated to people experiencing or at-risk of homelessness are required to be entered into HMIS. Grantees should refer to the contract to determine state reporting obligations relevant to the building and the people housed in it. Grantees should check the funder requirements for the other units in the building to determine if there is an HMIS requirement.

## Questions That Apply to California Community Colleges Chancellor's Office (CCCCO) Programs

### Questions About Which Programs and Grantees Need to Comply With AB 977

**95. Do CCCCCO projects need to be set up in HMIS if they do not have any beds or services dedicated to students experiencing homelessness or at risk of experiencing homelessness?**

No, only projects with beds or services dedicated to students experiencing homelessness or at risk of experiencing homelessness need to be set up in HMIS. If a project receives funding from a program included in AB 977, but does not meet these criteria, the grantee should email the Abt TA team at AB977\_TA@abtglobal.com to determine if HMIS is required and so Abt can update their records.

**96. Do colleges need to enter all Community Colleges Homeless and Housing Insecure Pilot Program (HHIP) participants in HMIS?**

Colleges should enter students into HMIS who receive HHIP-funded services when the project's primary purpose is to (1) meet the specific needs of people who are homeless by providing lodging and/or services, and/or (2) serve clients at-risk of homelessness with homelessness prevention (services and/or financial assistance) to stabilize their housing.

**97. Do colleges have to be set up in HMIS to enter client information if the housing providers that the college is partnering with are already set up in HMIS?**

If the college is providing direct services to students experiencing homelessness or at risk of homelessness with the HHIP program, the college will need to set up an HMIS project and enter client data. If the college is referring students to a partner organization for HHIP services, the partner organization will need to set up an HMIS project and enter client data. In cases where both the college and the housing partner provide direct services, data will need to be entered on behalf of both organizations.

**98. If a student in the HHIP program is a distance learner and does not live in the CoC where the HHIP program is operating, does the student need to be entered into a different CoC's HMIS based on where they are living?**

No. They do not need to be entered into a different CoC's HMIS. They should be entered into the HMIS of the CoC in which the HHIP program is funded to operate.

**99. For colleges with services areas that include multiple counties, which CoC's HMIS should the HHIP student data be entered into?**

The college and housing partners should work with each CoC that covers the counties in their service area.

**100. If a student in the HHIP program finds housing outside of the college service area, does the student need to be entered into a different CoC's HMIS?**

No. They do not need to be entered into a different CoC's HMIS.

**101. What [FERPA](#) guidance applies to HMIS data collection and reporting?**

HMIS privacy and security standards outlined in the [2004 HMIS Data and Technical Standards](#) seek to protect the confidentiality of personal information while allowing for reasonable, responsible, and

limited uses and disclosures of data. The CoC's allowable uses and disclosures of a client's Personal Protected Information (PPI) should be listed in a public Privacy Notice and may or may not require client consent. Likewise, FERPA protects the privacy of student education records, and allows for uses and disclosures of student data either by written consent or by allowable uses/disclosures under the law. Entering client data into HMIS does not in and of itself violate FERPA, nor does entering client data into school systems violate HMIS privacy policies. A client (in this case, the college student) must be given the opportunity to understand and allow for the uses and disclosures of each system into which their data are entered. School officials and HMIS users have a responsibility to follow the uses and disclosures strictly and to notify the appropriate party when an unauthorized use or disclosure is made from any system into which student data are entered.

**102. Should grantee colleges reach out to the HMIS Lead before they have a housing partner identified?**

Yes. Colleges should reach out to their HMIS Lead to start the conversation about project setup if they have not already. Colleges that provide direct services to students with HHIP funding will need to set up their own HMIS projects and enter client data. The HMIS Lead might also have suggestions for potential housing partners.

**103. If a student exits the HHIP program and later returns, do they need to complete a new intake and project enrollment in HMIS?**

Yes, the service provider should exit the student from the project when they are no longer receiving services from HHIP. If the student re-enrolls in HHIP, the student should be re-entered into either the same HMIS project or a different HMIS project as appropriate (depending on their housing status and type of services they are receiving).

**104. Does information need to be collected about a student's roommate if the roommate is not receiving HHIP-funded services?**

No, only information on dependents or family members (including married or unmarried couples living together) needs to be collected for HMIS. A roommate is not considered a member of the client's household in HMIS.

## Questions That Apply to California Department of Veterans Affairs (CalVet) Programs

### Questions About Project Setup and Ongoing Client-Level Data Entry

**105. How should a grantee add the AB 977 program funding code to clients enrolled in the program, if not every client in a housing project is enrolled being served by the VSSR program?**

Funding code is assigned at project level, not at the individual client level. If not all clients in a housing project are served by VSSR, multiple projects in HMIS will need to be set up with each project having the correct funding code attached. This will ensure that only clients receiving VSSR-funded services are enrolled in the project with the VSSR funding code. Alternatively, VSSR grantees can set up separate Services Only projects, add the VSSR funding code, and enroll only the clients receiving these services. Grantees and HMIS Leads should reference the HMIS Project Setup Instructions for more detail on possible VSSR project setup scenarios.

Per the [HMIS Data Standards Manual](#), the Funding Sources data element identifies a project's funding source(s) and is assigned at the project-level; there are no HMIS data elements that track funding programs associated with individual clients within a project. When a funding code is assigned to the project, all clients enrolled in that project will be counted in reports as receiving services or housing funded by that program. While some CoCs have customized their HMIS software to track funding at a client-level, these fields are not standard HMIS data elements and are not imported into HDIS and cannot be used by the State for AB 977 purposes.

**106. If HMIS Leads split up existing HMIS projects to separate clients receiving VSSR-funded services from those who are not, are there specific requirements grantees must follow for transferring client data from the existing project to the new project?**

Specific requirements for transferring or migrating client data in HMIS from one project to another differ by HMIS software and other local requirements. HMIS Leads and grantees should consult their vendor and [HUD's Grant Consolidation and Closing Projects](#) guide for different options for moving client data from one project to another. Client enrollment dates (project start date, exit date, and housing move-in date) and the project's operating start date should align with the guidance in the HMIS Data Standards Manual for these data elements. HMIS Leads and VSSR grantees should work together to ensure correct project set up by March 31, 2024.

## Questions That Apply to California Department of Health Care Services (DHCS) Programs

### Questions About Which Programs and Grantees Need to Comply With AB 977

- 107. Do BHBH grantees need to work with their HMIS Leads/CoCs to set up projects in HMIS?** Yes. The deadline to reach out to the HMIS Lead was March 31, 2024, for all grantees already serving clients. All other grantees should reach out to their HMIS Lead now to start the conversation about project setup even if they are still in the process of executing contracts with subgrantees or have not yet started serving clients. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).
- 108. Are Community Assistance, Recovery, and Empowerment (CARE) Program participants required to be entered into HMIS if they do not meet the BHBH homelessness definition?** CARE participants who do not meet BHBH's homelessness definition are not required to be entered into HMIS according to AB 977. CARE participants who meet BHBH's homelessness definition must be included in the same project as other BHBH-eligible clients.
- 109. Do individuals who receive only BHBH outreach and engagement or housing navigation services, with or without a bed night, need to be entered into HMIS?** Individuals who receive outreach and engagement or housing navigation services through BHBH funding should be entered into HMIS. If no other housing or services are provided, grantees should set up a Supportive Services Only (SSO) project. Please reach out to your HMIS Lead or Abt TA team to determine the appropriate project setup.

### Questions About Project Setup and Ongoing Client-Level Data Entry

- 110. Can clients decline to have their information entered into HMIS?** Yes. Please refer to [Question 29](#).
- 111. Do grantees need to enter data into HMIS for BHBH clients that had been served prior to May 31, 2024?** Yes, grantees are required to enter clients who are actively enrolled in a project on May 31, 2024, or the date that the project is set up, even if they began receiving BHBH services prior to that date. Grantees are not required to enter clients who entered and exited a project before May 31, 2024 (or before the project was set up) and are no longer being served by the project. All project-level and client-level data should reflect the actual start dates if they differ from the date the project was set up in HMIS. Cal ICH recognizes that grantees may be unable to complete certain Common Data Elements (CDEs) for existing clients who entered the project prior to project setup. Please refer to Appendix B in the [AB 977 HMIS Project Setup Instructions](#) for more details on which CDEs are required to be collected and at which data collection stage. Grantees who need assistance can email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com). Note: BHBH grantees do need to provide information on all individuals served in their BHBH quarterly reports.
- 112. What project types are allowed under the BHBH funding source?** BHBH grantees should only use the following project types for BHBH funding: Emergency Shelter: Entry/Exit (ES:EE), Emergency Shelter: Night-by-Night (ES:NBN), Rapid Rehousing (RRH: Services Only or

RRH: Housing with or without services), and Supportive Services Only: Services Only (SSO). Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information. For specific questions about project setup, grantees should work with the local HMIS Lead and the Abt TA team. For more information on how to contact the local HMIS Lead, please email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**113. What HMIS project type should be used for Auxiliary Funding in Assisted Living facilities?**

Grantees should use the Supportive Services Only: Services Only (SSO) project type for auxiliary funding in assisted living settings. Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information.

**114. Should funding associated with substance use disorder (SUD) facilities be set up as Supportive Services Only: Services Only (SSO) projects?**

Residential SUD treatment is not an allowable use of BHBH funds. Recovery Housing, or Sober Living Environments, can be set up as an Emergency Shelter project depending on how it is structured.

**115. Should all rental assistance programs be set up as Rapid Re-housing (RRH) projects? If a grantee uses BHBH funding to provide rental assistance to a client with their own lease, will this prevent the client from being prioritized for Permanent Supportive Housing (PSH)?**

Projects providing rental assistance to clients experiencing homelessness to stay in units where they would not have tenancy rights should be set up as Emergency Shelter (ES) projects. Projects providing rental assistance to clients in units where they would have tenancy rights should be set up as RRH projects. Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information about rental assistance and project types.

Continuums of Care (CoCs) determine who is prioritized for PSH at the local level. Grantees should work with the local HMIS Lead and the Abt TA team to determine how to set up projects to minimize the impact to their clients' eligibility and prioritization for PSH. For more information on how to contact the local HMIS Lead, please email the Abt TA team at .

**116. BHBH client eligibility requires clients to be homeless and to have a serious behavioral health condition. Will a custom field need to be created in HMIS to indicate that a BHBH client has a serious behavioral health condition?**

A custom field is not required in HMIS for BHBH clients to record serious behavioral health conditions.

**117. NEW: What common and universal data elements are required to be entered into HMIS?**

Grantees are required to enter Universal Data Elements (UDEs), items 3.01-3.917, and Program Specific Common Data Elements (CDEs), items 4.02-4.20 and W5 for all clients and members of their household being served by the specified state funding programs. Please see Table 2 in the [AB 977 HMIS Project Setup Instructions](#) for more information on which data elements are applicable to which HMIS project type.

**118. NEW: How do grantees safeguard BHBH client data to ensure that HMIS uploads are HIPAA compliant and do not expose client data?**

Grantees, subgrantees, and/or their contracted providers who are HIPAA-covered entities should review the CoC's Privacy Notice to determine if it meets or exceeds the standard set by HIPAA. If it does, the entity can participate in HMIS. If the Privacy Notice does not, grantees should engage with the CoC to revise the Privacy Notice to meet or exceed the requirements established by HIPAA privacy rules so the

HIPAA-covered entity can participate in HMIS. CoC Privacy Notices may be amended and applied retroactively, per the [2004 HMIS Data and Technical Standards Final Notice](#).

Please note that HMIS privacy and security standards were developed by HUD after careful review of HIPAA standards for securing and protecting patient information. The HMIS standard gives HMIS providers and CoCs broad authority to address matters not expressly covered by HIPAA. Because of this approach during standards development, most CoCs' privacy and security standards will already align with HIPAA standards. To that end, if the CoC's Privacy Notice outlines the mandatory and allowable uses and disclosures of data by HUD, and the AB 977 grantee (as the HIPAA covered entity) is not doing any additional types of uses or disclosures outside of what's listed in the Privacy Notice, then the grantee can participate in HMIS.

**119. NEW: Do grantees need to enter data into HMIS on every person they provide a BHBH-funded resource, including “Packs for Recovery” (clothing items, hygiene, etc.) and pet support services?**

All persons served using BHBH funds should be entered into HMIS and enrolled in a BHBH-funded HMIS project, even if the services provided were not shelter or housing. If the BHBH-funded services provided are associated with another project type, such as an Emergency Shelter or Rapid Rehousing project, then a separate SSO project would not need to be created. But if these services are not captured by another project, then an SSO project should be created.

## **Questions About Funding, Other Funder Codes, and Grant IDs**

**120. Can multiple rounds of BHBH funding be used for the same HMIS project?**

Yes. One HMIS project can be funded by multiple rounds of BHBH and/or multiple funding programs. If a project is funded by multiple AB 977 programs, grantees will need to enter multiple sets of funding codes and grant IDs. Please refer to the [HMIS Project Setup Instructions](#) provided by both departments.

**121. Does BHBH grant information need to be updated annually in HMIS?**

Funding sources and grant information should be updated according to the [HMIS Data Standards](#), including adding the correct AB 977 Other Funder Code and Grant IDs with accurate Grant Start and Grant End Dates per the [AB 977 HMIS Project Setup Instructions for BHBH Grantees](#).

## **Questions About Reporting**

**122. Is there a way in HMIS to extract data needed to complete the BHBH Quarterly Report?**

Yes, some of the data points in the BHBH Quarterly Report can be captured in HMIS. The additional data elements unique to BHBH quarterly reporting must be tracked by the grantee. Grantees with questions about the BHBH Quarterly Report should talk to their BHBH Liaison. Grantees with questions about HMIS reporting requirements should email the Abt TA team at [AB977\\_TA@abtglobal.com](mailto:AB977_TA@abtglobal.com).

**123. Are BHBH grantees or the HMIS Lead responsible for the BHBH Quarterly Reports? Is the BHBH Quarterly Report a custom report built into HMIS?**

BHBH grantees are responsible for the BHBH Quarterly Reports. It will be possible to derive some data from HMIS necessary for these reports. The BHBH Quarterly Report is not a custom report built by the HMIS Lead.

## Appendix A: List of Acronyms

| Acronym | Meaning                                                        |
|---------|----------------------------------------------------------------|
| Abt     | Abt Global (formerly Abt Associates)                           |
| AIDS    | Acquired Immunodeficiency Syndrome                             |
| APS     | Adult Protective Services                                      |
| BFH     | Bringing Families Home                                         |
| BHBH    | Behavioral Health Bridge Housing Program                       |
| Cal ICH | California Interagency Council on Homelessness                 |
| Cal Vet | California Department of Veteran Affairs                       |
| CCCCO   | California Community Colleges Chancellor's Office              |
| CDBG    | Community Development Block Grant                              |
| CDEs    | Common Data Elements                                           |
| CDSS    | California Department of Social Services                       |
| CE      | Coordinated Entry                                              |
| CES     | Coordinated Entry System                                       |
| CoC     | Continuum of Care                                              |
| DHCS    | California Department of Health Care Services                  |
| DOJ     | U.S. Department of Justice                                     |
| ERF     | Encampment Resolution Funding Program                          |
| ES      | Emergency Shelter                                              |
| ESG     | Emergency Solutions Grant                                      |
| FAQs    | Frequently Asked Questions                                     |
| FERPA   | Family Educational Rights and Privacy Act                      |
| FHC     | Family Homelessness Grants                                     |
| FVPSA   | Family Violence Prevention and Services Act                    |
| FY      | Fiscal Year                                                    |
| HCD     | California Department of Housing and Community Development     |
| HDAP    | Housing and Disability Income Advocacy Program                 |
| HDIS    | Homeless Data Integration System                               |
| HHAP    | Homeless Housing, Assistance, and Prevention Program           |
| HHC     | Housing for a Healthy California Program                       |
| HHS     | U.S. Department of Health and Human Services                   |
| HHIP    | Community Colleges Homeless and Housing Insecure Pilot Program |
| HIV     | Human Immunodeficiency Virus                                   |
| HMIS    | Homeless Management Information System                         |
| HOPWA   | Housing Opportunities for Persons with AIDS                    |
| HP      | Homelessness Prevention                                        |
| HSP     | CalWORKs Housing Support Program                               |
| HUD     | Department of Housing and Urban Development                    |
| HYMHP   | Homeless Youth Multifamily Housing Program                     |
| MHP     | Multifamily Housing Program                                    |
| NPLH    | No Place Like Home Program                                     |
| OVC     | Office of Victims of Crime                                     |
| OVW     | Office of Violence against Women                               |
| PH      | Permanent Housing                                              |
| PLEH    | Persons with Lived Experiences of Homelessness                 |

| <b>Acronym</b> | <b>Meaning</b>                                  |
|----------------|-------------------------------------------------|
| PSH            | Permanent Supportive Housing                    |
| RRH            | Rapid Re-Housing                                |
| SHMHP          | Supportive Housing Multifamily Housing Program  |
| TA             | Technical Assistance                            |
| UDEs           | Universal Data Elements                         |
| VHHP           | Veterans Housing and Homeless Prevention Act    |
| VSP            | Victim Service Provider                         |
| VSSR           | Veterans Support to Self-Reliance Pilot Program |