Comparable Database Manual

A GUIDE TO ASSIST VICTIM SERVICE PROVIDERS WITH UNDERSTANDING HUD FUNDING AND DATA ENTRY REQUIREMENTS

U.S. Department of Housing and Urban Development

ALIGNS WITH FY 2026 HMIS DATA STANDARDS | RELEASED OCTOBER 2025

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Revision History

Release Date	Revision Summary
October 2025	Updates throughout to align with FY 2026 HMIS Data Standards including: • Add element - 4.21 Sex • Retire element C4 Translation Assistance Needed

Introduction

Victim Services Providers (VSP) that are recipients or subrecipients under the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) and Emergency Solutions Grant (ESG) Programs are required to collect client-level data consistent with Homeless Management Information Systems (HMIS) data collection requirements. To protect survivors' safety, the Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit Victim Service Providers from sharing, disclosing, or revealing survivors' personally identifying information (PII), including entering information into shared databases like HMIS. To protect survivors, VSPs must enter HUD's required client-level data into a comparable database that is comparable to and complies with all HMIS requirements but is only accessible to the VSP. The survivor data reports the VSP program shares with HUD are in the aggregate (combined and does not include personal identifying information) to ensure survivor confidentiality.

This manual supports HUD's Office of Special Needs Assistance Programs (SNAPS) Data Strategy & Usability which sets out to achieve the following goals:

1. Communities use their data to optimize systems of care through making ongoing system performance improvements and determining optimal resource allocation.
2. Communities operate data systems that allow for accurate, comprehensive, and timely data collection, usage, and reporting.
3. Federal government coordinates to receive and use data to make informed decisions in coordination with other data sets, across and within agencies.

Additionally, currently in development, the VSP-CoC Data and Performance Strategy is a co-created framework of goals and strategies developed in partnership with people with lived experience. It is designed to guide VSPs and CoCs in transforming how they collect and use data to inform service provision and enhance support for survivors. The framework will provide strategies for fostering partnerships between CoCs, VSPs, and the survivors they serve, with the goal of harnessing the power of data to drive informed decision-making, improve service delivery, and ultimately empower survivors.

This document is not a replacement for any specific program guidance, requirements, regulations, notices, or training materials on the CoC or ESG Programs. This manual only provides an overview of HUD's programs in the context of a VSP and the use of a comparable database by VSPs. VSPs are required to use comparable databases for CoC and ESG programs. HUD recognizes that this can be a complicated process, especially for VSPs who are using a comparable database for the first time to effectively meet HUD requirements while ensuring survivor safety and confidentiality. Additional training and technical assistance are available and can be requested through the HUD Exchange's Request Program Assistance.

Think of a client record as the information normally contained in a file folder with multiple sections.

At its most basic level, an HMIS or comparable database collects information about a client served in a project. When the data about the same client is viewed across multiple projects, the data tells a story of the success and impediments the client has experienced to facilitate data-driven policy and programs.

- In the first section is a sheet of basic client information, often referred to as Personal Identifying Information (PII). This basic data, such as name, date of birth, race and ethnicity, is static information that will always go with the client and, for most people, will not change over time.
- The next section is the project data about the enrollment of a client into a particular project. This section contains the "forms" used to collect information about a client at intake and exit. If the client is enrolled in a project for more than a year, there is also an "annual assessment," which provides updated information to the intake. This section also contains what a caseworker might normally log in a notes section. For example, if the client received a benefit check and their income has increased, or the client moved into housing on a specific date. These are "transactional elements" that change over time and document progress made by the client. Annual assessments are based solely on the head of household's anniversary date. The annual assessment must include updating both the head of household's data and any other family members at the same time.
- There may be a subsection of data that is collected for a specific funding source. For example, U.S. Department of Health and Human Services (HHS) Runaway and Homeless Youth (RHY) program requires youth-focused questions, while the U.S. Department of Justice (DOJ) Victims of Crimes Act (VOCA) requires specific crime data[1].
- There may also be a subsection of data if the client exits the program and returns, to store the new intake and other information.
- If a client is enrolled in multiple projects, each of the remaining sections collect the same project data as identified above for the same client, but for a different project.

Victim Service Provider (VSP)

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 shelters and transitional housing programs, and other programs. A VSP is a designation at the agency level, not the project level (see 24 CFR 578.3).

VSPs are prohibited from entering data into HMIS. This includes those agencies who meet the definition above as well as those whose mission may not be specifically survivor focused but who receive funds through HHS Family Violence Prevention and Services Act (FVPSA), 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. To assist with determining if a project must record data

[1] https://www.federalregister.gov/documents/2016/07/08/2016-16085/victims-of-crime-act-victim-assistance-program#sectno-citation-%E2%80%8994.115

in an HMIS or comparable database, please see the HMIS Comparable Database Decision Tree. Questions about specific situations on the need to use a comparable database can be submitted to the HUD Exchange's HMIS "Ask A Question" desk.

Multi-service agencies (those that service survivors of violence and also have programs for those experiencing homelessness not as a result of violence) should consult the HMIS Comparable Database Decision Tree to understand if they need to use a comparable database or HMIS for their HUD-funded projects. For further guidance, please contact OVW/OVC/FVPSA directly, or submit a question through the Safe Housing Partnerships website.

Comparable Database

A comparable database is a relational database that meets all HMIS Data Standards and does so in a method that protects the safety and privacy of the survivor. A relational database is a collection of information that organizes data points with defined relationships for easy access and reporting. Excel and Google Sheets (spreadsheets) are not relational databases and do not meet the standards to be considered HMIS comparable in nature. HMIS Data Standards means that the comparable database must be able to collect all fields (data elements) required for an HMIS by the kind of project it is (e.g., Emergency Shelter, Rapid Re-housing). It must also allow the user to enter specific data at multiple data collection stages (record creation, project start, status update, annual assessment, and project exit) to support reporting and performance measurements required by HUD for all CoC and ESG program recipients and subrecipients.

HUD published the Comparable Database Vendor Checklist for recipients and subrecipients to use to verify that a comparable database is fully compliant with HUD's requirements. VSPs should only select software that complies with these requirements. Software that does not meet the baseline comparable database requirements will not be able to meet the reporting requirements that all CoC and ESG program recipients and subrecipients are responsible for fulfilling. Working with the HMIS Lead from the CoC on the selection of a comparable database may help provide the insight on data management and reporting needs necessary to meet minimum standards. In addition to the Safe Housing Partnerships website, some state domestic violence coalitions and the National Network to End Domestic Violence may also provide VSPs with information and technical assistance to support VSPs in understanding comparable database requirements and clarifying options.

Access to a comparable database is controlled by the VSP. Only staff who work directly with survivors and have a "need to know" professional basis, their supervisors, and key agency staff should be able to view specific client data. Further, as mandated by VAWA, FVPSA, and VOCA, the comparable database implementation may not allow for client information to be shared across multiple providers. For example, VSP A and VSP B may not share information about the same client in the comparable database, even if they are both actively serving the client. VSPs may use CoC and ESG funds to "establish and operate" a comparable database. This allows VSPs to purchase existing "off-the-shelf" products. However, CoC and ESG

funding cannot be used for the technical development of a brand-new comparable database.

Consultation with HMIS Lead

VSPs should connect with their community's HMIS Lead for their expertise in the requirements of their data collection systems. HMIS Lead Contact Information is available on the HUD Exchange and can be located by contacting the CoC covering your geographic area, which oversees their HMIS implementation, and with whom VSPs will need to consult with if they are participating in Coordinated Entry.

Some VSPs may use a separate instance of the CoC-selected HMIS as a comparable database, whereas other VSPs may select a completely different software product. Both options are allowable, but in cases where the VSP uses the same software as the CoC, the HMIS Lead may be able to provide more direct technical support.

Identify Projects for Inclusion in a Comparable Database

Comparable Database Project Setup

It is important that VSPs understand the difference between a **program** and a **project** because they have distinct meanings in the context of HUD and HMIS, which likely differ from how a VSP uses and understands these terms. A program is the source of funding that the organization is receiving to run its project. For example, ESG **Program** funding is for the ABC Emergency Shelter **project**. The project is the direct housing/service delivery. For data collection and reporting purposes, HUD and its federal partners refer to categories of funding within a program as **components**. For example, the ESG **Program** funds the Emergency Shelter **component**; allowable activities of an Emergency Shelter under ESG include both Essential Services and Shelter Operations.

Identify all the **projects** that the VSP operates that receive CoC or ESG program funding, or other projects that the VSP wants to collect data on in the comparable database. The comparable database does not have to be limited to only federally funded projects and having the additional project information can help VSPs have data that more accurately reflects the needs and services being provided in the community as well as to evaluate the performance of their projects. If a VSP operates two separate shelters, there should be two separate projects set up in the comparable database. Likewise, if the VSP also operates transitional housing or Rapid Re-Housing (RRH), there must be a separate project for the transitional housing and the RRH in the comparable database. For example, if a client exits a shelter and enters transitional housing, the shelter record has an intake and exit form and the transitional housing project also has a separate intake and exit form completed for the client.

VSPs may have projects that receive funding from multiple sources for the same project to serve the same clients. The HMIS Data Standards manual outlines the considerations VSPs need to think about when setting up projects with multiple funding sources. For additional

details on the differences between HUD-funded projects, consult the HMIS Project Setup sections in CoC Program HMIS Manual and ESG Program HMIS Manual.

Project Descriptor Data Elements

Project Descriptor Data Elements (PDDEs) form the core information a system needs to be able to generate correct reporting for HUD, and include foundational information about the VSP, the project(s) operated by the VSP, and the funding source tied to the project. Comparable databases only need to include the data elements for the funding streams the VSPs are receiving, not for other funding streams the programs do not access. Specifically, several of these fields are used in Question 4 of the CoC Annual Performance Report (APR) and ESG Consolidated Annual Performance and Evaluation Report (CAPER). It is the VSP's responsibility to ensure that all fields are completed correctly. VSPs should check with the comparable database vendor to determine how and where the following information is stored in the system and whether it is accurately set up.

Organizational Information (2.01)

- **Organization ID:** An alpha/numeric series established by the vendor that is unique to the VSP organization.
- **Organization Name:** The legal name of the organization (i.e., VSP)
- **Victim Service Provider:** Indicate "yes" that the organization is a VSP by entering "1".

Project Information (2.02)

- **Project ID:** an alpha/numeric code is established by the vendor that is unique to the project. The VSP must be sure that the vendor has provided a code unique to their project. *Sage will not accept two projects with the same project ID for ESG-CV or APR and CAPER reporting.*
- **Project Name:** The name of the project (e.g., Safe DV Shelter) which should be recognizable to the recipient and subrecipient as the name of the project funded.
- **Operating Start Date:** The Operating Start Date of a project must be completed on all projects within the comparable database. The Operating Start Date of the project is defined as the first day the project provided services or housing. Thus, this date must be no later than the date the first client served in the project was entered into the project. For projects which began operating prior to October 1, 2012, the start date may be estimated if not known.
- **Operating End Date:** An Operating End Date must be entered when a project closes. The Operating End Date must be the last day on which the last client received housing or services. The Operating End Date should be left empty if the project is still in operation.
- **Continuum Project:** All CoC and ESG Program funded projects are part of the Continuum of Care and should be marked as "yes" for whether they are Continuum Projects. Consult the HMIS Program Manuals for any other federal partners to determine if they should be classified as "Continuum Projects".
- **Project Type:** – a system code (number) which allows the comparable database to generate the correct report for the correct kind of project. **Each project (e.g.,**

Emergency Shelter, Services only, PH-Rapid Re-housing, etc.) must only have one project type.

- **If PH – Rapid Re-Housing, Identify Sub Type**: Select the appropriate RRH sub type. Note, this field is only applicable for RRH projects.
- **Affiliated with a residential project:** For all projects typed 'Services Only,' or RRH Services Only subtype projects, identify if the services that are being provided are in conjunction with a residential project which is a separate project in the HMIS (e.g., a service only project for case management that services one or more PSH projects). If so, record the project IDs of the affiliated services only project.
- **Housing Type:** Indicate the appropriate type of housing for the project, such as site-based or tenant-based. Site-based can be a single site, where all clients are housed in a single location, or clustered/multiple sites where clients are in multiple locations that are owned or managed by the project. Tenant-based is always scattered site, where clients are housed in residences not owned or managed by the project. Note, this field is only applicable to residential projects.
- **Target Population:** Identify the Target Population to be served by the project, if applicable. Here, VSPs would indicate they serve survivors of domestic violence by entering "1".

Continuum of Care Information (2.03)

A VSP receiving HUD funding must set up their comparable database to include key geographic information, such as CoC code, geocode, and zip code. For privacy purposes, VSPs are only required to include the geocode and ZIP code fields and may use mailing or administrative address information if they wish to include a full address field.

- **CoC Code:** The HUD-assigned CoC Code number for the CoC the project is located in.
- **Geocode:** A six-digit number (geographic codes) for Metropolitan Cities, Urban Counties, and all counties in the United States.

Funding Sources (2.06)

- **Funder Program and Components**: Select the applicable Federal Partner Program(s) and Component (e.g., HUD: ESG-Emergency Shelter).
- **Grant Identifier**: The 'Grant Identifier' may be the grant number assigned by the Federal Partner or any other grant identification system used by a funder.
- **Grant Start Date:** The start date of the grant.
- **Grant End Date:** The grant end date may remain empty until the term of the grant ends. If the exact same grant source and component is renewed the grant end date is not required to be entered. The grant end date may remain empty until such time as the renewal(s) end.

Bed and Unit Inventory Information (2.07)

The bed and unit inventory information must be completed for residential projects (PSH, RRH, and TH). The number of beds is generally equivalent to the number of people a residential project can house on a given night. The bed and unit information is based on the

number and type of beds in the entire project, which may be more beds/units than are funded by the HUD or a federal partner program.

HMIS Leads should review the FY 2026 HMIS Data Standards for additional detail about recording bed and unit inventory information.

HMIS Participation Status (2.08)

HUD and federal partner-funded projects are required to participate in HMIS or a Comparable Database. VSPs must indicate the participation status for projects funded by these sources as "Comparable Database Participating" and the date on which the participation started. For projects that began participating in HMIS prior to October 1, 2012, the start date may be estimated.

Coordinated Entry Participation Status (2.09)

VSPs should work together to identify the CE status of each comparable database participating project. Projects that are serving as a CE Access Point, whether a standalone CE project or another HMIS project type, must select "Yes" to "Project is a Coordinated Entry Access Point" and indicate the types of CE services provided by the Access Point. Additionally, if a project receives referrals from CE, indicate "Yes" in response to the "Project Receives CE Referrals" field.

Projects Funded by Multiple Jurisdictions

1. Specifically, with ESG funding, projects may receive funding from multiple jurisdictions (e.g., an ESG award from a State and another ESG award from a City). In such cases the following guidance applies: Projects funded under Street Outreach, Homelessness Prevention, or Rapid Re-Housing which receive an ESG award from more than one jurisdiction (e.g., City-funded RRH and State-funded RRH) must be able to:
    a. Separate the clients served in a combined project for each ESG jurisdiction; and
    b. Produce a valid CAPER for each ESG jurisdiction.

    HUD's standard guidance in these situations is to set up a separate project for each jurisdiction. For example, if there is an RRH project in which the City funds rental assistance and the State funds stabilization services, two projects would be set up in the HMIS. A client receiving only rental assistance would only be enrolled in the City project. Enrolling the client only in the project they are receiving assistance in will ensure clients are not counted twice at the national level.

    However, the VSP may create a single project for multiple ESG awards from more than one jurisdiction in certain circumstances. If the project is designed to use both funding sources for one project which, when combined, enables everyone in the project to receive both housing and services to meet the need of the household experiencing homelessness, then both fund sources may be in one project in the HMIS. The VSP is encouraged to seek guidance through the HUD AAQ if they think

there is any other circumstance in which they may be able to combine funding from multiple jurisdictions in a single project in a way which will not negatively impact the ESG data collection and reporting.

2. A single project which receives an ESG: Emergency Shelter award from more than one jurisdiction **does not need to separate its clients into two separate projects** within the comparable database. For example: Shelter XYZ receives City and State ESG funding. The shelter is set up in the comparable database as one shelter, and there is no need to distinguish between which client was served with each ESG funding source. HUD understands that this will cause the individuals served in the emergency shelter to be counted in both the state and the city CAPERs.

For each project type, VSPs will have to review the reporting requirements specific to the funding source. The sections below provide a brief overview of what the project types are and how they are funded through HUD's homeless assistance programs. For more information specific to data collection requirements please refer to the following resources:

- CoC Program HMIS Manual
- ESG Program HMIS Manual

Emergency Shelter (ES)

An emergency shelter is a project where the primary purpose is to provide a temporary shelter for people experiencing homelessness. Shelters look different across the country. In general, for system set-up and reporting purposes, when a VSP has an emergency shelter it is in a single building. That building's shelter program should be set up in the comparable database as an Emergency Shelter project and all the residents of that building are entered in the shelter project. A VSP that operates multiple buildings (e.g., shelters in different counties or regions) may have multiple Emergency Shelter projects set up in the comparable database – to account for the occupancy and potentially different funding sources of the different shelter buildings. In some communities, funding for hotel/motel vouchers and essential services is provided from ESG to provide the VSP a means of providing shelter; in these cases, the hotel/motel project may be a VSP emergency shelter project in the comparable database.

In its data standards, HUD recognizes two different types of shelter – a night-by-night (NBN) and an entry/exit (EE) shelter. The identification of a shelter as NBN is generally limited to mass shelters where individuals come and go on a regular basis, often may not stay inside during the day, and do not have a "reservation" or a reserved bed. The EE model of sheltering is much more common among family shelters and domestic violence shelters. These shelters conduct an intake, assign a household to a room or section of the shelter, and that household remains in shelter while the VSP works on their plan for permanent housing.

HUD Funding: Emergency shelters are eligible to be funded under HUD's ESG program. Under ESG, the Emergency Shelter component includes three distinct activities which may be funded: Shelter Operations, Essential Services, and Renovations. Regardless of the activity the shelter is funded by ESG to provide, there will be one ESG CAPER report generated from

the comparable database in a Comma Separated Value (CSV) format to upload to the HMIS Reporting Repository (Sage) for each shelter project. ESG does not differentiate between persons who may have received a funded service and persons who have not received that service. The basic ESG Shelter reporting rule is if $1 of ESG funding goes towards an Emergency Shelter then all persons are counted. A "services only" project is never set up in the comparable database for Emergency Shelter services funded by HUD.

It is possible that a VSP may receive funding from ESG or ESG-CV (supplemental ESG funds via the CARES Act) from multiple recipients (e.g., both the city and the state). The VSP should NOT create a new shelter project in their comparable database for each funding source. HUD understands that if a single shelter project is funded by multiple recipients, the same aggregate client data is reported in all CAPERS.

Transitional Housing (TH)

Transitional Housing Programs provide people experiencing homelessness a place to stay combined with supportive services for up to 24 months.

HUD Funding: TH is eligible to be funded through the CoC program. HUD funds a limited number of TH projects under ESG that were grandfathered from the older ESG statute. No new TH projects should be funded under ESG. These grandfathered TH projects are funded under the Emergency Shelter component and include three distinct activities which may be funded: Shelter Operations, Essential Services, and Renovations. Regardless of the activity the TH project is funded by ESG to provide, there will be one ESG CAPER report generated from the comparable database in a CSV format to upload to Sage for each TH project. All persons residing in the TH project are always included in the report.

Street Outreach

Street outreach is targeted at people living in unsheltered situations (e.g., bus stations, parks, parking garages). For VSPs, this may include projects which reach out and try to connect with persons experiencing both homelessness and human trafficking. Street Outreach projects for all HMIS federal partners measure the number of contacts made until a client is *engaged*. Engagement means a client contact has led to an interactive client relationship that results in a deliberate client assessment or the beginning of a case plan. Engagement and handing the client off to a successful housing or service referral is the goal.

HUD understands that there are special data collection challenges for street outreach projects and does not consider data quality in HMIS or comparable database records until the point that the client is engaged. A street outreach project is likely to encounter difficulty engaging people experiencing homelessness. Street outreach projects may record an individual in a street outreach project in the comparable database with limited information about the client and improve on the accuracy and completeness of client data by editing data in the comparable database as the client is further engaged. For example, the initial entry may only include the project start date and a "made-up" name (e.g., "Redhat Tenthstreetbridge") that would be identifiable for the worker in the system. Over time, the

data must be edited for accuracy and completeness (e.g., replacing "Redhat" with "Roberta") as the worker learns more about the client.

HUD Funding: Street outreach is eligible to be funded under HUD's CoC and ESG programs.

Rapid Re-Housing (RRH)

RRH assistance is designed to quickly rehouse individuals or families experiencing homelessness in permanent housing and help them become stable in that housing through a combination of rental assistance and supportive services. RRH projects provide short-term or medium-term assistance, with the unit lease between the landlord and the program participant, where the program participant selects the unit they lease, and the provider cannot impose a restriction on how long the person may lease the unit, though the provider can impose a maximum length of time that grant funds will be used to assist the program participant in the unit. VSP's may be funding their RRH projects through the CoC DV-Bonus grant.

All persons who have been accepted into RRH are entered into the comparable database in the individual RRH project. Housing relocation services may begin prior to housing move-in and should be designed to support the household to quickly find and access appropriate housing. Once a person moves into the housing unit, a "housing move-in date" must be entered into the client's record to indicate move-in has occurred.

Beginning in the FY 2026 HMIS Data Standards, Rapid Re-Housing (RRH) projects can be classified in one of two subtypes – 'Services Only' or 'Housing with or without services.' You will select only one subtype per RRH project in the 2.02 Project Information element. For more information specific to RRH sub-types please refer to the HMIS Data Standards Manual.

HUD Funding: RRH is eligible to be funded under HUD's CoC and ESG programs.

Permanent Supportive Housing (PSH)

PSH is community-based housing without a designated length of stay in which supportive services are provided to assist homeless persons with a disability to live independently. Units may be site-based or scattered-site units.

All persons who have accessed a PSH unit must be entered into the comparable database that is providing the housing/services. Some, but not all, communities provide housing search and placement services through their CE system or through the PSH project itself. Once a person moves into the housing unit, a "housing move-in date" must be entered into the client's record to indicate move in has occurred.

HUD Funding: PSH is eligible to be funded under HUD's CoC program.

Joint Component TH-RRH (TH-RRH)

The Joint Component TH-RRH project provides a flexible model to provide both TH and RRH in a single project and is one of the options for funding under the CoC DV Bonus grant. There

is no minimum length of stay for persons in TH or RRH. Assistance length should be tailored to meet the household's need and services designed to support access and stability in permanent housing are to be provided.

There are two projects created in the comparable database for Joint Component TH-RRH projects – one TH and one RRH project.

Some clients may use the TH project and not access the associated RRH project, whether because the appropriate opportunity has not yet arisen or because a more appropriate housing placement was found. However, all clients entering the TH project should have a Project Start Date (data element 3.10) in the RRH project on the same day as the TH Project Start Date to indicate that they are under consideration for this portion of the project. A Joint Component TH-RRH project will file a single APR but will be required to account separately for both the TH and RRH bed and unit inventories and CSV uploads. Additional instructions for project set up and data collection for Joint Component projects can be found here.

HUD Funding: Joint TH-RRH is eligible to be funded under HUD's CoC program.

Homelessness Prevention (HP)

Homelessness prevention is housing relocation and stabilization services and possibly short- or medium-term rental assistance necessary to prevent people at risk of becoming homeless from becoming homeless. All participants of the HP project must be entered into the comparable database.

HUD Funding: HP is eligible to be funded under HUD's CoC and ESG programs. However, recipients can only be funded to provide HP under the CoC program if they are designated by HUD as a "high performing community".

Coordinated Entry (CE)

Coordinated entry is a process for people experiencing, or at risk of homelessness, to access homeless assistance. CE includes how people access services, how they are prioritized, and how referrals to housing and services are provided. The goal of CE is to increase the efficiency of local crisis response systems and improve fairness and ease of access to resources, including mainstream resources.

While VSPs are prohibited from entering PII into HMIS, HUD is encouraging CoCs to work with their VSPs to establish either a process for their participation in the CoC's CE system or establish their own CE process outside of the HMIS. VSPs who receive a CoC Program SSO: CE grant, a DV Bonus grant (directly from HUD or sub-awarded from the CoC) or received funding through ESG to carry out CE activities are *required* to collect CE data within their comparable database.

All CE data must be recorded by way of a single dedicated project or with the addition of required elements to existing projects. It is important that this process provides access to

all available housing and services regardless of whether the individual or family presents for intake at a survivor-specific access point or a mainstream homeless service access point.

HUD Funding: CE is eligible to be funded under HUD's CoC (as a Supportive Services Only grant) and ESG programs (through the ES, Street Outreach, RRH, or HP components).

Data Collection Requirements

Further information on the rationale, collection point, subjects, and instructions for each element can be found in the 2026 HMIS Data Standards Dictionary and Manual.

Universal Data Elements (UDE)

All ESG and CoC program recipients and subrecipients, for all project types, are required to collect all the Universal Data Elements for survivors who prefer to share their information, which include:

3.01 Name
3.02 Social Security Number
3.03 Date of Birth
3.04 Race and Ethnicity
3.07 Veteran Status
3.08 Disabling Condition
3.10 Project Start Date
3.11 Project Exit Date
3.12 Destination
3.15 Relationship to Head of Household
3.16 Enrollment CoC
3.20 Housing Move-in Date
3.917 Living Situation

Special notes about UDEs

- Many of these elements comprise basic demographics about a client which are critical to a comparable database's ability to de-duplicate client records.
- Two of the elements are required to identify a client as chronically homeless: Disabling Condition and Prior Living Situation.
- Updated in the FY 2024 HMIS Data Standards Manual is the response "client refused to answer" to replace "Client prefers not to answer," underscoring the choice clients have to share their data, which is understood as a neutral personal preference by HUD.
- **Project Start Date:** VSPs should provide comparable database users, especially in RRH, additional information on when each project type is expected to begin data entry with Project Start.
  - **For Street Outreach projects** – the date of first contact with the client.
  - **For Transitional Housing** – the date the client moves into the residential project (i.e., first night in residence).
  - **For all types of Permanent Housing, including RRH** – the date the client was admitted into the project. Admission into the project indicates the client met the following factors:
    1) Information provided by the client or from the referral indicates they meet the criteria for admission (for example: if chronic homelessness is required, the client indicates they have a serious disability and have been homeless long enough to qualify, even though all documentation may not yet have been gathered);
    2) The client has indicated they want to be housed in this project;

3) The client can access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, scattered-site subsidy) or expects to have one in a reasonably short amount of time.

- **For Joint Component TH/RRH** – Please refer to the CoC Program Joint Component Funding: Project Setup and Reporting in HMIS guidance.
- **For all other types of Service projects** including but not limited to **homelessness prevention and coordinated entry** – the date the client first began working with the project and generally received the first service. More information for coordinated entry projects can be found in the Coordinated Entry Management and Data Guide.

Common Program Specific Data Elements (PSDE)

Common PSDEs are data collected by most projects funded by one of the federal partners. The following chart indicates which elements are required for collection for various component types. Comparable databases are required to collect PSDEs 4.02-4.21, C2, and W5.

Data Element	Emergency Shelter	TH	RRH	PSH	Services Only	Street Outreach	CE	Homelessness Prevention
4.02 Income and Sources	x	x	x	x	x	x		x
4.03 Non-Cash Benefits	x	x	x	x	x	x		x
4.04 Health Insurance	x	x	x	x	x	x		x
4.05 Physical Disability	x	x	x	x	x	x		x
4.06 Developmental Disability	x	x	x	x	x	x		x
4.07 Chronic Health Condition	x	x	x	x	x	x		x
4.08 HIV/AIDS	x	x	x	x	x	x		x
4.09 Mental Health Disorder	x	x	x	x	x	x		x
4.10 Substance Use Disorder	x	x	x	x	x	x		x
4.11 Domestic Violence	x	x	x	x	x	x		x
4.12 Current Living Situation						x	x	

4.13 Date of Engagement						x		
4.14 Bed Night								
4.19 Coordinated Entry Assessment	x*	x*	x*	x*	x*	x*	x	x*
4.20 Coordinated Entry Event	x*	x*	x*	x*	x*	x*	x	x*
4.21 Sex	X	X	X	X	X	X		x
C2 Moving On Assistance				x				
W5 Housing Assessment at Exit								x

* Data collection is determined by how the CoC has structured the coordinated entry system to operate.

Additional data elements are required to be programmed, maintained, and updated by the comparable database vendors if an organization applies for the specific federal funds. If a recipient is applying for or has been awarded funds for any program that is federally required to use HMIS and requires elements and reporting functionality for that recipient, the vendors must add these elements to their system and HUD encourages the new version be made available to all customers serving survivors experiencing homelessness, as this is the purpose and benefit of having a single software standard and set of functional requirements across federal agencies. These may include:

- HUD-HOPWA Only Required Elements (W1-W6)
- HHS-PATH Only Required Elements (P1-P4)
- HHS-RHY Only Required Elements (R1-R20)

- VA Required Elements (V1-V9)
- YHDP Only Required Elements (C3, R7-12, R17, R19)

Coordinated Entry

Coordinated entry is a process developed to ensure all people experiencing a housing crisis have fair and equal access to the community's housing and homeless assistance resources. VSPs may receive CoC funding to operate an SSO-CE project and must work with their community to establish a process that is aligned with or parallel to the CoC's CE system. VSPs may not use ESG funds to establish or operate a stand-alone CE project.

Project Setup

VSPs who are SSO-CE grant recipients must set up their comparable database to collect the required CE elements. Administrators may choose to collect CE data with a single CE project (project type 14) or on multiple projects if the VSP is using a no wrong door approach. No wrong door means the required Coordinated Entry data elements (4.12 Current Living Situation, 4.19 Coordinated Entry Assessment and 4.20 Coordinated Entry Event) are added to and collected on several existing projects of various project types, as opposed to a single dedicated CE project. Regardless of which project setup is used, the VSP must be able to produce a CE APR CSV with all necessary CE data elements.

Reporting

CoC, ESG, and ESG-CV Program recipients are required to submit aggregated program information via the Sage HMIS Reporting Repository. All HUD-funded VSP recipients must submit data from their comparable database via a Comma Separated Value (CSV) import. VSPs should work with their comparable database vendor to ensure their system is able to generate the necessary reports. Other funders may require additional reporting requirements and VSPs need to work with their funder to ensure they fulfill data collection requirements for each funder.

Reporting for ESG and CoC funded projects are designed to engage grantees in the performance of their projects and help identify the impact of projects on overall system performance. A series of CoC APR and ESG CAPER videos are available to help projects understand the importance of data quality and provides information on how to use their report data to evaluate project and system performance.

Comparable databases must Generate CoC APR, ESG CAPER, Coordinated Entry zipped CSV report accepted into the Sage repository and have the ability to export a complete, current unhashed and hashed HMIS CSV. The CSV format must include all HMIS.CSV tables and headers, including data elements not programmed for collection in the vendor's system.

CoC Program Reporting

CoC Program recipients are required to submit Annual Performance Reports (APR) within 90 days from the end of their grant operating year. The APR is a generated by a comparable database in CSV format and contained in a zipped file, consistent with the CoC APR HMIS Programming Specifications. VSPs can test their CSV export uploads anytime at www.sagehmis.info.

The Coordinated Entry APR (CE APR) is required for Continuum of Care Program Supportive Services Only - Coordinated Entry grants (SSO-CE), including those where the recipient is a VSP using a comparable database. This APR is significantly different from other APRs for the CoC Program and there is a separate report in the comparable database from the regular (full) APR. The CE APR is a 'system-wide' report, regardless of how the CE system operates (e.g., no wrong door, single point of contact, etc.) This means that the report will always include ALL data about the CE system, regardless of how many separate CE projects exist in the CoC or comparable database.

VSPs must coordinate with their CoC's HMIS lead because when a VSP reports on their CE grant, they will provide one CSV upload from their comparable database for the clients they assisted **and** another CSV file from the CoC's HMIS representing all other persons assisted in the CoC's CE system. Likewise, a HUD-funded VSP must provide the CoC with a CE APR CSV generated by the comparable database for inclusion in the CoC's CE APR submission. No additional or separate upload(s) is required from a non-HUD funded VSP who is not conducting assessments or referral activities but is instead referring clients to the community's CE system.

CoC Program recipients can find additional information about CoC Program reporting requirements including how to access Sage and submit an APR in the Sage CoC APR Guidebook for CoC Grant-Funded Programs.

ESG Program Reporting

ESG program subrecipients are required to submit a project-level CSV-CAPER Report to each ESG recipient that funded a project, using the date range specified by the recipient. The CAPER is generated by a comparable database in CSV format and contained in a zipped file, consistent with the ESG CAPER HMIS Programming Specifications. VSPs can test their CSV export uploads anytime at www.sagehmis.info.

ESG program subrecipients can find additional information about ESG reporting requirements in the Sage ESG CAPER Guidebook for ESG-funded Programs.

Additional Additional reporting is required to be programmed, maintained, and updated by the comparable database vendors if an organization applies for the specific federal funds. If a recipient is applying for or has been awarded funds for any program that is federally required to use HMIS and requires elements and reporting functionality for that recipient, the vendors must add these elements to their system and HUD encourages the new version

be made available to all customers serving survivors experiencing homelessness, as this is the purpose and benefit of having a single software standard and set of functional requirements across federal agencies. These may include: the ability to generate reports for PATH, RHY, YHDP, and HOPWA.

Appendix

Appendix 1: HMIS Acronyms

Abbreviation	Term	Definition
AAQ	Ask a Question	Through the AAQ function on the HUD Exchange one can get answers to: HUD reporting systems, including troubleshooting system errors, drawdowns, activity setup and update, submitting APRs and QPRs; Eligible activities, costs, and participants; Income determination, rent limits, property standards, program income; and Requirements, such as Environmental Review. (HUD Exchange)
APR	Annual Performance Report	The project or project type report recipients of CoC homeless assistance grants submit through SAGE. (HUD Exchange)
ARPA	American Rescue Plan Act	The Act includes several provisions to provide immediate and direct relief to help people across America remain stably housed during the pandemic. (HUD.gov)
CAPER	Consolidated Annual Performance and Evaluation Report	The report grantees use to report on progress toward Consolidated Plan goals. (HUD.gov)
CDBG	Community Development Block Grant	A program that supports community development activities to build stronger and more resilient communities. (HUD Exchange)
CE	Coordinated Entry	A project that administers the continuum's centralized or coordinated process to coordinate assessment and referral of individuals and families seeking housing or services, including use of a comprehensive and standardized assessment tool. (HUD Exchange)
CoC	Continuum of Care	1. A program designed to promote communitywide commitment to the goal of ending homelessness; 2. group organized to carry out the responsibilities required under 24 CFR 578; 3. A geographic region (CoC Interim Rule).
DDC	Data Driven Culture	Making decisions based on numbers crunched and insights generated using data.
EHV	Emergency Housing Voucher	Program available through the American Rescue Plan Act.

ES	Emergency Shelter	A project that offers temporary shelter (lodging) for the homeless in general or for specific populations of the homeless. Requirements and limitations may vary by program, and will be specified by the funder. (HMIS Data Standards)
ESG	Emergency Solutions Grant	Funding source to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. (HUD Exchange)
e-snaps	The "e" stands for electronic	Electronic CoC Program Application and Grants Management System used by HUD's Office of Special Needs Assistance Programs. (HUD Exchange)
HDX	HUD Data Exchange	Online tool designed to allow Continuums of Care to submit data to HUD. HIC, PIT and SPMs are reported through HDX 1.0. LSA data are reported through HDX 2.0. (HUD Exchange)
HIC	Housing Inventory Chart	Reports provide a snapshot of a CoC's inventory of housing conducted annually during the last ten days in January. (HUD Exchange)
HOME	HOME (not an acronym)	Grants to states and units of general local government to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low and very low-income Americans. (HUD.gov)
HOME-PJ	HOME – Participating Jurisdiction	States and localities that receive HOME funds. (HUD Exchange).
HOPWA	Housing Opportunities for People Living with AIDS	The HOPWA Program is the only Federal program dedicated to the housing needs of people living with HIV/AIDS. Under the HOPWA Program, HUD makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons living with HIV/AIDS and their families. (HUD Exchange)
HP	Homeless Prevention	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. (HMIS Data Standards)

HUD	(U.S. Department of) Housing & Urban Development	The Federal agency responsible for national policy and programs that address America's housing needs, that improve and develop the Nation's communities, and enforce fair housing laws. (HUD.gov)
OPH	Other Permanent Housing	Consists of HMIS project types: PH – Housing with Services (no disability required for entry) and PH – Housing Only, defined per the HMIS Data Standards.
PII	Personal Identifying Information	PII is data that can be used to distinguish or trace an individual's identity, including an individual's name, address, other contact information and social security number.
PIT	Point In Time	A count of sheltered and unsheltered people experiencing homelessness that HUD requires each Continuum of Care (CoC) nationwide to conduct in the last 10 days of January each year. (HUD Exchange)
PSH	Permanent Supportive Housing	A project that offers permanent housing and supportive services to assist homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently. (HMIS Data Standards)
PSH	Permanent Supportive Housing	A project that offers permanent housing and supportive services to assist homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently. (HMIS Data Standards)
Sage	Sage (not an acronym)	HMIS Reporting Repository for APR and CAPER. (HUD Exchange)
SO	Street Outreach	A project that offers services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Only persons who are "street homeless" should be entered into a street outreach project. Projects that also serve persons other than "street homeless" must have two separate projects to be set up in

		HMIS, one 'Street Outreach' and the other 'Services Only'. (HMIS Data Standards)
SPM	System Performance Measures	The operationalization of the selection criteria for HUD to use in awarding funding under the CoC. Communities use these measures to report their system level performance to HUD. (HUD Exchange)
SSVF	Supportive Services for Veteran Families	This program, supported by the VA, provides services to very low-income homeless veterans. The SSVF program works with homeless veterans and veterans at risk of homelessness to quickly stabilize housing so that they can become independent. (HUD Exchange)
Stella	Stella (not an acronym)	Believed to be a name chosen to represent the group of women responsible for the first iteration of the LSA data visualization system. (HUD Exchange)
RRH	Rapid Rehousing	A permanent housing project that provides housing relocation and stabilization services and short- and/or medium term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. (HMIS Data Standards)
TH	Transitional Housing	A project that provides temporary lodging and is designed to facilitate the movement of homeless individuals and families into permanent housing within a specified period of time, but no longer than 24 months. Requirements and limitations may vary by program, and will be specified by the funder. (HMIS Data Standards)
VSP	Victim Service Provider	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. (24 CFR 578.3)
YHDP	Youth Homelessness Demonstration Project	YHDP is an initiative designed to reduce the number of youth experiencing homelessness.

		The goal is to support selected communities, including rural, suburban, and urban areas across the United States, in the development and implementation of a coordinated community approach to preventing and ending youth homelessness. Additionally, HUD is committed to sharing that experience of YHDP communities and mobilizing communities around the country toward the same end. (HUD Exchange)

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