



Guidelines

FOR THE

Washington State Homelessness Diversion Program Grant May 2024

Contents

- 1 Grant Basics..... 4**
 - 1.1 Overview and Purpose..... 4
 - 1.2 Fund Source 5
- 2 Diversion Services..... 5**
 - 2.1 What is Diversion? 5
 - 2.2 What is a Phased Assessment? 5
- 3 Household Eligibility & Types of Diversion Assistance..... 6**
 - 3.1 Housing Status Eligibility Criteria:..... 6
 - 3.2 Income Eligibility Criteria..... 7
 - 3.2.1 Income Eligibility Documentation..... 7
 - 3.3 Are programs required to work with the local Coordinated Entry (CE)? 7
 - 3.4 Eligibility and Assistance Summary 8
- 4 Allowable Expenses 8**
 - 4.1 Administration Expenses 8
 - 4.2 Program Operations 9
 - 4.3 Flex Funding..... 10
- 5 Required Trainings..... 11**
- 6 Requirements 11**
 - 6.1 Accessibility 11
 - 6.2 Grievance Procedure 11
 - 6.3 Low Barrier Services 12
 - 6.4 Trauma-Informed Services 12
 - 6.5 Nondiscrimination 12
 - 6.6 Prohibitions..... 13
 - 6.7 Fraud and Other Loss Reporting..... 13
- 7 Administrative Requirements 13**
 - 7.1 Fiscal Administration 13
 - 7.1.1 Reimbursements..... 13
 - 7.1.2 Budget Revisions..... 13
 - 7.1.3 Payments on a Deliverable 13
 - 7.2 Grant Management 14
 - 7.2.1 Changes to Guidelines 14

7.2.2	Commerce Monitoring.....	14
7.2.3	Subgrantee Requirements	14
7.2.4	Subgrantee Risk Assessment and Monitoring	14
8	Data Collection Requirements (HMIS)	14
8.1	Data Quality	15
8.1.1	Completeness.....	15
8.1.2	Timeliness	16
8.1.3	Accuracy	16
8.1.4	Consistency	17
8.2	Consent for Entry of Personally Identifying Information	17
8.2.1	Identified Records.....	17
8.2.2	Anonymous Records	18
8.2.3	Special Circumstances.....	18
8.3	HMIS Data Suppression Policy	18
8.3.1	Data Suppression	18
8.3.2	When Data Suppression Is Required	18
8.4	HMIS Data Element for the Diversion Program.....	19

1 Grant Basics

1.1 Overview and Purpose

The Diversion Program is a critical resource in the homeless crisis response system¹. The purpose of the funding is to:

- Provide Diversion services to families and individuals facing a housing crisis (experiencing homelessness or at risk of homelessness) to reduce in-flow to the homeless crisis response system.
- Prioritize services to communities who have a demonstrated disproportionate representation in homelessness, housing instability, and housing affordability:
 - Black, Indigenous, and People of Color (BIPOC), including people identified as socially disadvantaged as defined in 13 CFR Sec. 124.103.
 - People with disabilities
 - People who are deaf
 - People with behavioral health conditions, including substance use disorder
 - People who identify as LGBTQIA+
 - Survivors of family violence and/or intimate partner violence
 - Incarcerated and formerly incarcerated individuals
 - Undocumented individuals, immigrants and refugees, and mixed-immigration status families and communities

Research shows us that people living unhoused or experiencing a housing crisis become stably housed when the system is:

- Low barrier (see section 6.3), trauma-informed² (section 6.4), and culturally responsive³;
- Focused on problem-solving and personal advocacy to help people identify practical solutions based on their own available resources.

To that end, we expect Commerce grantees to be leaders in their homeless crisis response systems, facilitating partnerships among service organizations and promoting evidence-based, anti-racist practices.

Grantees must respond to the disproportionality in access to services, service provision, and outcomes and must rely on more than standard business practices to address inequity.

Grantees are responsible for ensuring all people eligible for services receive support and are served with dignity, respect, and compassion regardless of circumstance, ability, or

¹ A crisis response system helps people exit homelessness quickly. The goals of an effective crisis response system are to identify those experiencing homelessness, prevent homelessness when possible, connect people with housing quickly and provide services when needed

² Trauma-informed programs are aware of trauma and how it impacts a person's ability to cope and manage in what may be perceived as dangerous environments. Trauma-informed care is an approach that aims to engage people with histories of trauma, recognize the presence of trauma symptoms, and acknowledge the role that trauma has played in their lives.

³ Culturally responsive programs understand and consider the different cultural backgrounds of the people they offer services to. They adapt to meet the needs of the people they serve.

identity. This includes marginalized populations, Black, Native, and Indigenous, People of Color, immigrants, people with criminal records, people with disabilities, people with mental health and substance use vulnerabilities, people with limited English proficiency, people who identify as transgender, people who identify as LGBTQ+, and other individuals that may not access mainstream support.

The Homelessness Assistance Unit provides access to continuous learning on trauma-informed services, racial equity, LGBTQ+ competency, and more. We can help you strategize outreach and help you understand your data so we can meet Washington's vision that no person is left living outside.

1.2 Fund Source

The Diversion Program is funded by State General Funds as allocated by the Legislature.

Grant documents and resources can be found on the program webpage: [Washington State Homelessness Diversion Program - Washington State Department of Commerce](#)

2 Diversion Services

2.1 What is Diversion?

Diversion is a service strategy that uses problem-solving conversations and personal advocacy to help households identify practical solutions for resolving their housing crisis quickly and safely. Households are prompted to identify safe housing options and solutions based on their own available resources, not those of the homeless crisis response system.

Problem-solving conversations and personal advocacy should be flexible and responsive to the client's needs. These services may include conversation, negotiation with the household's family or property manager, or assistance navigating mainstream resources.

To help ease the transition out of the crisis, Diversion Services offers households a flexible combination of short-term services and financial assistance (if needed).

Diversion can occur in person, over the phone, virtually, or in the context of mobile outreach services.

2.2 What is a Phased Assessment?

Assessment is the process of gathering information about a person experiencing a housing crisis in order to understand the person's immediate needs and to connect them to appropriate resources or interventions. Diversion services funded by this program will be provided as part of a phased assessment approach. With a phased approach, assessment components are conducted at various stages. This person-centered, trauma-informed approach is designed to build partnerships with clients and to limit data collection to only the information necessary to assist in resolving the immediate housing crisis.

Phased assessment will help grantees assist people with their immediate needs while limiting long contact periods. It can also help manage a higher volume of calls and

inquiries. Phased assessment can be flexible; the components of phased assessment can be done over a couple of days, a week, or on the same day, if necessary.

Basic Phased Assessment Components:

1. **Crisis Needs Assessment:** Screening to define the nature of the current crisis and ensure the person's immediate safety. The outcome of a crisis needs assessment could include a referral to an emergency service, such as a victim service provider or another community resource, or continuing to the next phase of the assessment process.
 - Do you have a safe place tonight?
 - Are you in danger, or do you need protection from violence?
2. **Diversion:** Problem-solving conversations and personal advocacy to help a household identify practical solutions for resolving their housing crisis quickly and safely. The outcome of a Diversion could include a creative short-term plan other than entering the homeless crisis response system.
 - Do you have safe friends and family that you could stay with?
 - Do you need help with mediation to maintain your current housing?
 - Can flexible funding assist with this?

3 Household Eligibility & Types of Diversion Assistance

A problem-solving conversation should be offered to all households experiencing a housing crisis that seek assistance from the Diversion Program.

3.1 Housing Status Eligibility Criteria:

Eligible households (individuals, families with children⁴, youth, and young adults) must be experiencing a housing crisis, are at risk of homelessness, or are experiencing homelessness.

Examples include **but are not limited to**:

- Living outside or in a place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a vehicle, park, abandoned building, bus or train station, airport, or campground. This includes sanctioned and unsanctioned encampments.
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening conditions that relate to violence against the household member(s), including children, that have either taken place within the household's primary nighttime residence or has made the household member(s) afraid to return to their primary nighttime residence.
- Residing in temporary housing programs, including shelters, transitional housing, hotels, and motels paid for by charitable organizations or government programs.

⁴ Families with children includes parents who are involved with the child welfare system, for whom stable housing would aid in the family reunification process.

- Exiting a system of care or institution where no subsequent residence has been identified.
- Residing in a trailer or recreational vehicle parked illegally or in a location not intended for long-term stays (e.g., parking lots).
- Living “doubled-up” or “couch-surfing” as defined by sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason.
- Living in motels or hotels due to the lack of alternative adequate accommodations.
- At imminent risk of losing stable housing.

Documentation of Housing Status IS NOT REQUIRED.

3.2 Income Eligibility Criteria

Income eligibility criteria only apply to households receiving financial assistance (Flex Funding).

The combined household income must not exceed 80 percent of the net Area Median Income.

Income limits are based on Area Median Income (AMI), which can be located for each county at www.huduser.gov (Data Sets, Income Limits).

Income is money paid to, or on behalf of, any household member. Income includes the current net income (annualized) of all adult (18 years and older) household members and unearned income attributable to all household members. Income eligibility determinations are based on the household’s net income at program entry.

Net income is the amount earned after subtracting taxes and other deductions from gross income.

3.2.1 Income Eligibility Documentation

Grantees must document the net income of households receiving Flex Funding. The following are allowable documentation methods:

- Recent pay stubs or payment statement
- Bank statements
- 3rd party mailed, faxed, or emailed verification of income
- 3rd party verbal verification of income
- Self-declaration

3.3 Are programs required to work with the local Coordinated Entry (CE)?

No, programs are not required to have formal connections to or accept referrals from CE. However, HAU recommends that programs develop partnerships with the local CE to refer clients whose housing crisis cannot be resolved with diversion or other available services.

3.4 Eligibility and Assistance Summary

	Housing Status Eligibility	Income Eligibility	Assistance
Diversion Without Financial assistance	<ul style="list-style-type: none"> • Homeless • At Risk of Homelessness 	<ul style="list-style-type: none"> • No income requirement 	<ul style="list-style-type: none"> • Problem Solving Conversations • Personal Advocacy • Negotiation and Mediation with Landlords/friends/family • Housing stabilization planning • Connection to mainstream services • Other Non-Financial Services
Diversion With Financial assistance	<ul style="list-style-type: none"> • Homeless • At Risk of Homelessness 	<ul style="list-style-type: none"> • At or Below 80% AMI 	<ul style="list-style-type: none"> • Problem-Solving Conversations • Personal Advocacy • Negotiation and Mediation with Landlords/friends/family • Housing stabilization planning • Connection to mainstream services • Other Non-Financial Services • Financial Assistance (Flex Funding)

Commerce invites grantees to reach out for clarification as needed.

4 Allowable Expenses

4.1 Administration Expenses

Allowable administrative costs benefit the organization as a whole and cannot be

attributed specifically to a particular program. Up to 20 percent of total reimbursed costs over the course of the grant period may be used for administration. This limit must be reconciled before the end of the grant period.

Administrative costs may include the same types of expenses listed in program operations (such as IT staff and office supplies) in the case that these costs benefit the agency as a whole and are not attributed to a particular program. Administrative costs may include, but are not limited to, the following:

- Executive director salary and benefits.
- General organization insurance.
- Organization-wide audits.
- Board expenses.
- Organization-wide membership fees and dues.
- General agency facilities costs (including those associated with executive positions) such as rent, depreciation expenses, and operations and maintenance.

All amounts billed to the administration must be supported by actual costs or portions of actual costs. These costs must be charged to grant cost centers by one of the following three methods:

- Billed directly, such as IT services billed by the hour.
- Shared costs that are allocated directly by means of a cost allocation plan.
- Federally approved indirect cost rate or by use of the 10 percent de minimus.

4.2 Program Operations

Operations expenses are directly attributable to the program and are associated with the provision of Diversion services:

- Salaries and benefits for staff costs directly attributable to the program or to the homeless system, including but not limited to program staff, information technology (IT) staff, human resources (HR) staff, bookkeeping staff, and accounting staff.
- Office space, utilities, supplies, phone, internet, and training related to grant management and/or service delivery/conferences/travel and per diem.
- Equipment up to \$5,000 per grant period unless approved in advance by Commerce.
- Travel expenses associated with mobile or outreach-based Diversion service delivery.
- Supplies related to the program.
- Staff training related to the program.
- Interpretation and translation services to ensure program accessibility.

4.3 Flex Funding

Flex Funding is direct financial assistance provided on behalf of the household as needed to ease the transition out of the crisis. Not every household facing a housing crisis will need Flex Funding.

Flexible Funding payments must be paid directly to a third party on behalf of the household.

Flex Funding includes but is not limited to:

Eligible Flex Funding Category	Examples
Application Fees	<ul style="list-style-type: none"> Rental application fees Payments for background and credit check
Moving Expenses	<ul style="list-style-type: none"> Moving vehicle rental Moving supplies
Move-In Assistance	<ul style="list-style-type: none"> Security or damage deposits First and last month's rent Other administrative fees required to move into housing
Storage	<ul style="list-style-type: none"> Cost of short-term storage
Transportation	<ul style="list-style-type: none"> Transportation costs to relocate participants and to help them reconnect to their support system Car repairs, gas vouchers, bus tickets, or other transportation costs related to employment, childcare, or education
Essential Needs	<ul style="list-style-type: none"> Essential household needs, including food, personal health and hygiene items, and cleaning supplies
ID and Documents	<ul style="list-style-type: none"> Fees for securing identification documents, birth certificates, and social security cards
Employment	<ul style="list-style-type: none"> Required employment supplies (uniform, boots, tools, etc.), tests, certifications/license fees, or materials related to employment if it's directly tied to a housing solution
Legal Services and Fees	<ul style="list-style-type: none"> Legal fees required to access or maintain housing
Interpreter/Translation Services and Fees	<ul style="list-style-type: none"> Interpreter/translation fees related to finding or maintaining housing. For example, if a client needs an interpreter to have a conversation with their landlord. <p><i>*This does not include program costs to hire interpreters or translators to ensure language access for clients. This is an allowable Program Operations expense.</i></p>

Arrears	<ul style="list-style-type: none"> • One-time rent payment of previous housing debt/rental arrears if payment will facilitate an immediate housing solution
Other	<ul style="list-style-type: none"> • Other costs as approved in advance by Commerce

5 Required Trainings

Direct service staff positions funded by the program and their direct supervisors are required to attend the following trainings as soon as available, all of which are free of charge by Commerce:

- HMIS
- Introduction to Problem Solving (Diversion)
- Trauma-Informed Services
- Lowering Barriers and Harm Reduction
- Working with Survivors of Domestic Violence
- LGBTQ+ Informed Training
- Racial Equity in Homeless Services
- Building Changes [Intensive Diversion Training](#)

Visit the Commerce Housing Division Grantee Training [website](#) for available online training.

6 Requirements

6.1 Accessibility

In-person services must be accessible for people who use wheelchairs or mobility devices and must provide reasonable accommodations as needed (e.g., mobile services, telephone numbers, or online access).

Grantees must ensure effective communication with people with disabilities, including access to all appropriate auxiliary aids and services necessary (e.g., braille, large type, assistive listening devices, and sign language interpreters).

Grantees must ensure effective communication with people who speak other languages, have limited English proficiency, and/or have limited literacy abilities, as is locally appropriate.

6.2 Grievance Procedure

Grantees must have a written grievance procedure for households seeking or receiving services, which includes the participant's right to review decisions and present concerns

to program staff not involved in the grievance.

This procedure must:

- Clearly describe how participants can request a review or report concerns
- Be accessible to all participants seeking or receiving services

6.3 Low Barrier Services

Grantees must provide low-barrier services, including flexible availability and minimal documentation requirements. At the minimum, households cannot be screened out based on the following criteria:

- Having too little or no income
- Having poor credit or financial history
- Having poor or lack of rental history
- Having involvement with the criminal justice system
- Having active or a history of alcohol and/or substance use
- Having been impacted or affected by a crime
- The type or extent of disability-related services or supports that are needed
- Lacking ID or proof of U.S. Residency Status (Immigration status)
- Other behaviors that are perceived as indicating a lack of “housing readiness,” including resistance to receiving services

6.4 Trauma-Informed Services

Grantees must provide trauma-informed services. Trauma-informed programs are aware of trauma and how it impacts a person’s ability to cope and manage in what may be perceived as dangerous environments. Trauma-informed care is an approach that aims to engage people with histories of trauma, recognize the presence of trauma symptoms, and acknowledge the role that trauma has played in their lives.

6.5 Nondiscrimination

Grantees must comply with all federal, state, and local nondiscrimination laws, regulations, and policies.

Grantees must comply with the Washington State Law against Discrimination, [RCW 49.60](#), as it now reads or as it may be amended. RCW 49.60 currently prohibits discrimination or unfair practices because of race, creed, color, national origin, families with children, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, or the presence of any sensory, mental, or physical disability or the use of a trained guide dog or service animal by a person with a disability.

Grantees serving households with children must serve all family compositions.

Local nondiscrimination laws may include additional protected classes.

6.6 Prohibitions

Grantees may not require households to participate in a religious service as a condition of receiving assistance.

Grantees may not terminate or deny services based on a refusal to participate in supportive services. Supportive services are helping or educational resources that include support groups, mental health services, alcohol and substance abuse services, life skills or independent living skills services, vocational services, and social activities. Supportive services do not include housing stability planning or case management.

6.7 Fraud and Other Loss Reporting

Grantees must inform Commerce in writing of all known or suspected fraud or other loss of any funds or other property furnished under this grant. Reasonable attempts must be made to prevent fraud and ineligible use of funds.

7 Administrative Requirements

7.1 Fiscal Administration

7.1.1 Reimbursements

Grantees must bill Commerce monthly for reimbursement of allowable costs. Invoices are due on the 20th of the month following the billing period. Final invoices for a biennium may be due sooner than the 20th. If the grantee fails to submit an invoice within a three-month period without a reasonable explanation, Commerce may take corrective action, resulting in withholding of payment or a reduction in the contracted amount. Exceptions to billing procedures can be negotiated with Commerce on a case-by-case basis.

Invoices must be submitted online using the Commerce Contract Management System (CMS) via Secure Access Washington (SAW). Contact your Grant Manager to access the online invoicing system.

7.1.2 Budget Revisions

Budget revisions that move less than 10% of the grant total may be performed by request to Commerce. The Administration budget cap must be maintained with each revision.

A contract amendment is required when revisions (in one or cumulative transfers) reach over 10 percent of the grant total.

7.1.3 Payments on a Deliverable

Grantees may request payments on a deliverable (e.g., requesting funding after submitting a plan to deliver services).

Requests must not exceed twenty-five percent of the fiscal year budget total for up to a

three-month period. Allowable expenses include Program Operations and Flex Funding. Contact your Grant Manager if you need to learn more or to request payments on deliverables.

7.2 Grant Management

7.2.1 Changes to Guidelines

Commerce may revise the guidelines at any time. Grantees will be sent revised copies. Grantees are responsible for sending revisions to subgrantees, if any, in a timely manner.

7.2.2 Commerce Monitoring

Commerce will monitor grant activities. Grantees will be given a minimum of 30 days' notice unless there are special circumstances that require immediate attention. The notice will specify the monitoring components.

7.2.3 Subgrantee Requirements

General Terms & Conditions identify subgrantee requirements. In addition, all subgrantee agreements must be time-limited and have defined roles and responsibilities for each party, detailed budgets, and performance terms. Commerce reserves the right to contact subgrantees directly at any time for data quality, monitoring, fiscal, and other issues.

Grantees must provide Commerce with copies of subgrant agreements upon request and notify Commerce if subgrants are terminated during the grant period.

Grantees must notify Commerce of any changes in the selection of subgrantees.

7.2.4 Subgrantee Risk Assessment and Monitoring

Grantees are responsible for ensuring subgrantee compliance with all requirements identified in the guidelines. The Grantee must conduct a risk assessment and develop a monitoring plan for each subgrantee within six months of contracting. The risk assessment must inform the monitoring plan for each subgrantee. Monitoring plans must include monitoring dates, the type of monitoring (remote, on-site), and the program requirements being reviewed.

The Grantee must maintain policies and procedures that guide the risk assessment, monitoring activities, and monitoring frequency.

Commerce reserves the right to require Grantees to undertake special reviews when an audit or other emerging issue demands prompt intervention and investigation.

8 Data Collection Requirements (HMIS)

Grantees providing direct services must enter client data into the Homeless Management

Information System (HMIS) in accordance with the most current [HUD HMIS Data Standards](#).

Balance of State Grantees only: For assistance with an HMIS-related question or issue, submit a ticket through Commerce’s [HMIS Helpdesk Form](#). Please visit the Commerce [HMIS](#) website for forms, information on training, past newsletters, and additional HMIS-related resources. Balance of State CoC Grantees must adhere to the [Agency Partner Agreement](#).

Non-Balance of State Grantees only: For assistance, contact your CoC’s HMIS system administrator.

Counties not using the State HMIS (data integration counties), must work with the HMIS Manager to provide full CSV exports every three months/quarterly. When Commerce is able to accept monthly imports, counties must upload data to the State’s HMIS using XML or CSV schema compliant with current HUD HMIS Data Standards. Uploads must occur no later than the 30th calendar day following the end of each month. Counties not able to export and upload data to the State HMIS using an approved format must use the State HMIS for direct data entry.

8.1 Data Quality

Grantees are required to provide quality data to the best of their ability. Maintaining good data quality is important for effective program evaluation. Data quality has four elements: completeness, timeliness, accuracy, and consistency.

8.1.1 Completeness

Completeness of data is measured by the percentage of incomplete fields in required data elements.

Agencies are expected to collect **first name, last name, date of birth, and race and ethnicity** from clients that give consent on the [HMIS client informed consent form](#) (or local CoC’s equivalent form; modifications must be approved by Commerce). **Agencies will never require a client to provide this information even if they have consented, but should gather it to the best of their ability.**

All clients, consenting and non-consenting, must have complete **prior living situation** and **exit destination** data.

Examples of incomplete entries:

Incomplete Entries	
Data Element	Incomplete if...
Name*	[Quality of Name] field contains Partial, Street name, or Code name, Client doesn’t know, Client prefers not to answer, or Data not collected; or [First Name] or [Last Name] is missing.
Date of Birth*	[Quality of DOB] field contains Approximate, Partial DOB reported, Client doesn't know, Client prefers not to answer, or Data not collected; or [Date of Birth] is missing.
Race and Ethnicity*	[Race and Ethnicity] field contains Client doesn't know, Client prefers not to answer, Data not collected, or is missing.

Prior Living Situation	[Prior Living Situation] is Client doesn't know, Client prefers not to answer, Data not collected, or is missing.
Destination	[Destination] is Client doesn't know, Client prefers not to answer, No exit interview completed, Data not collected, or is missing.

*Only measured for consenting clients.

Expected completeness measures for project types:

Expected Completeness Measures				
Data Element	Emergency Shelter Entry-Exit	Emergency Shelter Night-by-Night/Drop-in	All other Housing Project Types	Street Outreach
Name*	85%	80%	95%	90%
Date of Birth*	85%	80%	95%	90%
Race and Ethnicity*	85%	80%	95%	90%
Prior Living Situation	85%	80%	100%	85%
Destination	80%	50%	95%	50%

*Only measured for consenting clients

8.1.2 Timeliness

Client data should be entered into HMIS as close to the date of collection as possible. Entering data as soon as possible supports data quality by avoiding backlogs of pending data and allowing near real time analysis and reporting.

Grantees must enter/update project client/household data in HMIS within 14 calendar days following the date of project start/exit.

8.1.3 Accuracy

Data entered into HMIS must reflect the real situation of the client/household as closely as possible.

Accurate data is necessary to ensure that any project reporting fairly represents the work of the project and each client's story.

Examples of data accuracy:

Elements of Data Accuracy	
Date of Birth and Project Start Date	Ensure the two are not the same dates.*
Prior Living Situation data elements	Ensure responses for Prior living situation, Length of stay in prior living situation, Approximate date homelessness started, Number of times the client has experienced homelessness in the last 3 years, and Number of months experiencing homelessness in the last 3 years do not conflict with each other.
Disabling Condition	Ensure the Yes/No answer does not conflict with the specific types of disabling conditions.
Health Insurance	Ensure the Yes/No answer does not conflict with the specific types of health insurance.
Monthly Income	Ensure the Yes/No answer does not conflict with the specific sources

	of monthly income.
Non-Cash Benefits	Ensure the Yes/No answer does not conflict with the specific sources of non-cash benefits.
Relationship to Head of Household	Ensure there is only one Head of Household for any given household (including clients served individually) and that this element is entered and accurate for all household members.
Veteran Status	Ensure individuals under 18 years of age are not identified as veterans.
Project Population Specifics	Ensure that projects only serving individuals only enroll individuals and not multi-person households. Ensure that projects only serving families with children only enroll families with children. Ensure that projects only serving clients of a specific age range only enroll clients of that age range.

* **Date of Birth** should only be the same or after **Project Start Date** if a child is born while the household was already participating in the project.

8.1.4 Consistency

Consistent data helps ensure that any reporting generated by a project is understood. Data consistency is important for effectively communicating the processes and outcomes of a project.

All data will be collected, entered, and stored in accordance with the [Agency Partner Agreement](#).

All data elements and responses will be entered per the [HUD HMIS Data Standards Manual](#). To avoid inconsistency, agencies should use language on intake forms that closely matches the elements and responses in HMIS.

Clients who refuse consent must be made anonymous per the Department of Commerce’s [Consent Refused Client and Domestic Violence Providers Guide](#) (or local CoC’s equivalent guidance and form).

8.2 Consent for Entry of Personally Identifying Information

8.2.1 Identified Records

- Personally identifying information (PII)⁵ must not be entered into HMIS unless all adult household members have provided informed consent.
- Informed consent must be documented with a signed copy of the [HMIS client informed consent form](#) (or local CoC’s equivalent form) in the client file. If electronic consent has been received, a copy does not need to be printed for the client file but must be available in HMIS. If telephonic consent has been received, complete the consent form the first time the household is seen in person. See [Agency Partner HMIS Agreement](#).

⁵ PII includes name, social security number, birthdate, address, phone number, email, and photo.

8.2.2 Anonymous Records

The following types of records must be entered anonymously:

- Households in which one adult member does not provide informed consent for themselves or their dependents
 - Households entering a domestic violence program or currently fleeing or in danger from domestic violence, dating violence, sexual assault, human trafficking, or a stalking situation
 - Minors under the age of 13 with no parent or guardian available to consent to the minor's information in HMIS
 - Households in programs which are required by funders to report HIV/AIDS status

8.2.3 Special Circumstances

If the reporting of the HIV/AIDS status of clients is not specifically required, the HIV/AIDS status must not be entered in HMIS.

If a combination of race, ethnicity, gender, or other demographic data could be identifying in your community, those data should not be entered for anonymous records.

8.3 HMIS Data Suppression Policy

8.3.1 Data Suppression

Data suppression refers to various methods or restrictions that are applied to datasets, reports, or visualizations in order to protect the identities, privacy, and personal information of individuals.

In Washington State, [RCW 43.185C.180](#) and [RCW 43.185C.030](#) specify that all personal information in the HMIS is confidential and that the identity and right of privacy of these individuals must be protected.

Personal Identifiable Information (PII) is a separate topic and must never be disclosed to any entity that does not have HMIS access or is not part of your data sharing agreement.

8.3.2 When Data Suppression Is Required

It is the policy of the HMIS program to suppress data when the data contains demographic detail, the numbers are small enough to potentially identify a person, and:

- Will be in a public space or presentation or
- Will be shared with an entity that is not covered in the [HMIS client informed consent form](#) (or local CoC's equivalent form).

In these cases, any non-zero counts that are under 11 will be suppressed.

Additional suppression will be needed when the suppressed value can be derived from other reported values. For example, when you can calculate the suppressed value by

subtracting other values from the grand total.

The exceptions to data suppression are zero values or values that fall under an “unknown” category type. Both of these circumstances do not contribute any valuable information that could identify a person or reveal confidential data and, thus, are not subject to suppression.

Learn more about how to apply data suppression and which data-sharing entities are required to meet this policy in the [HMIS Data Suppression Policy document](#) (or local CoC’s equivalent guidance).

8.4 HMIS Data Element for the Diversion Program

HMIS Data Element	Homelessness Diversion
3.01-3.917 Universal Data Elements	X
4.02 Income and Sources	X
4.03 Non-Cash Benefits	X
4.04 Health Insurance	X
4.05 Physical Disability	X
4.06 Developmental Disability	X
4.07 Chronic Health Condition	X
4.09 Mental Health Disorder	X
4.10 Substance Use Disorder	X
4.11 Domestic Violence	X
4.12 Current Living Situation	X