

## Exposure Draft

# Proposed Standard for Regional Public Good Statements in Housing and Homelessness

This Exposure Draft of proposed Measurement and Reporting Standards is issued by the SD Public Regional Outcomes Standards Board for public comment.

Written comments should be addressed to

Research and Technical Director  
Serial Reference No. 2023-ED-009

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**Notice to Recipients of This Exposure Draft of a Proposed Measurement Standard.**

The Board invites comments on all matters in this Exposure Draft. Interested parties may submit comments in one of three ways:

- Using the electronic feedback form available on the PROS Board website at Exposure Documents Open for Comment
- Emailing comments to [sdprosboard@sdcta.org](mailto:sdprosboard@sdcta.org), Serial Reference No. 2023-ED-009
- Sending a letter to “Research and Technical Director, Serial Reference No. 2023-ED-009, San Diego Public Regional Outcomes Standards Board, San Diego Taxpayers Educational Foundation, 2508 Historic Decatur Road, San Diego, CA 92106.”

All comments received are part of the PROS Board’s public file and are available at [www.sdcta.org/sdprosboard](http://www.sdcta.org/sdprosboard).

DRAFT - NOT FINAL

## Purpose of Exposure Draft

The purpose of this Exposure Draft is to disclose the scope, area, and function of “Statements of Regional Public Good,” which organize the regional measuring and reporting standards on housing and homelessness. Having a measurement and reporting standard permits consistency in funder evaluations of program proposals, and this promotes investments in the most effective and efficient programs.

This draft is dually intended to inform the public, members of the Public Regional Outcomes Standards Board (PROS Board), PROS Board Working Group participants, and all other regional stakeholders in the achievement and reporting of successful outcomes in public services on the due processes of the PROS Board and its Working Groups which culminated in this proposed standard and document. The purpose and intention of the PROS Board itself is to facilitate a collaborative and consensus-based approach to determining regional standards on the reporting of outcomes and data in public services.

This document and the proposed standard contained herein are the results of this collaborative and consensus-based approach, with community wide-participation, including those members of firms that conduct independent auditing of social sector organizations.

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## Objective

The PROS Board issues these Regional Public Good Statement standards to organize the regionally-accepted measurement and reporting principles in housing and homelessness services. These standards are issued to facilitate clarity in the reporting of regional public good, allowing for more economization of valuable community resources for homelessness service providers, funders, and municipal leaders.

## Standards of Public Good Accounting and Reporting

### Scope and Scope Exceptions

These standards apply to public, quasi-public, and private organizations, including program funders, in San Diego County who are sufficiently engaged in addressing homelessness to have either a finance committee in its governance or an independent financial or performance auditing requirement, whether externally required or self-imposed. Within scope are those sufficiently engaged organizations who either have meaningful data on those experiencing or having previously experienced homelessness or a need to monitor outputs or outcomes from more than one program intended to service populations experiencing homelessness.

Organizations excluded from these standards are private organizations who may have data on those experiencing homelessness but do not perform services directly or those organizations who directly service those experiencing homelessness but are not sufficiently large to have a finance committee or an independent financial or performance auditing requirement. For example, these standards are not expected to be followed by a dry-cleaning business who might interface regularly with individuals experiencing homelessness, even if providing food or money, nor a group of volunteers who might provide water to individuals on the street. These standards would not apply to an individual philanthropist who as a private party finances services to those experiencing homelessness; conversely, a philanthropic organization or fund with public reporting requirements are expected to observe these standards of data utilization. Similarly, a small church who does intend to service those experiencing homelessness and conducts periodic financial or performance audits would fall within the scope of these standards.

### Statements of Regional Public Good

Organizations in scope shall report their impact in housing and homelessness within San Diego County utilizing three reports as provided in Appendix C, Illustrative Examples.

1. A **statement of regional public good position** is a snapshot in time, analogous to a financial balance sheet, except in units of persons. This statement represents, in essence, the cumulative regional public good that the organization has created and the cumulative regional public good

value that has been lost.

2. A **statement of regional public good activity** accounts for a period of time, analogous to a financial statement of activities, except in units of persons. This statement represents, in essence, the regional public good value created or lost during a materially significant period of time.
3. A **statement of regional public good flow** accounts for dedicated expenditures in dollars and the outcomes outside the control of the organization in units of persons while additionally accounting for the organization's results. This statement completes the statements of regional public good in reconciling beginning and ending regional public good positions with the regional public good activities for the relevant period of time.

### Statement of Regional Public Good Balance

To do a complete accounting of regional public good for any specific date, the organization must also pick a date, normally the organization's founding date, from which to account for cumulative impact in persons served to the community. If the organization picks a date other than its founding, the organization should disclose why it chose that date; for instance, an organization may not have historic records to its founding but only to a certain date.

### Statement of Regional Public Good Activities

An organization must pick a materially significant period of time, normally a quarter, for which it can account for its regional public good activities.

Additionally, the organization should also in the footnotes delineate for persons enrolled or engaged and persons exited what services were delivered, e.g., nutritional assistance, therapy, etc.. This footnote is required, as an organization cannot break this down in subaccounts on the statement of regional public good activities because an enrolled, engaged, or exited person may have received more than one service; presentation on the actual statement of regional public good activity could result in overcounting.

### Statement of Regional Public Good Flow

This statement serves two functions and is structured to present information for those two functions.

First, the accounting of financial expenses in the relevant period of time creates transparency in the organization's expenditures, which detail what may make the organization's operational design unique from others. By separating out real estate, pay and benefits, information technology expenditures, and other financial resources dedicated to clients in the conduct of regional public good activities, for instance, a reader can see what makes this organization unique in its delivery of public good. To account for these financial expenses accurately, an organization would need a functional expense policy to account for specific program types.

Second, the accounting of flow of people within the organization's operations and flow outside of the organization's operations separates externalities from the organization's unique operational design.

Whereas flow of persons within an organization's operations, relative to expenses, might be an indicator of operational efficiencies, flow of persons outside an organization's operations might be an indicator of resiliency of the services provided to individuals in achieving effective regional public good outcomes.

## Key Organizing Terms for Statements of Regional Public Good

Many of the terms used on the statements of regional public good to classify the accounting of regional public good are defined in their respective PROS Board rules. That said, the terms are defined here so that future editions of current PROS Board rules can reference this classifying rule and reduce redundant information.

### Classifications of Housing and Homelessness Strategies/ Programs

**Prevention.** Homelessness prevention strategies represent a wide array of efforts to prevent housing crises from occurring and to prevent people who face such crises from experiencing homelessness.

Prevention strategies are described in Home, Together as falling into the following categories:

1. Activities that reduce the prevalence of risk of housing crises within communities;
2. Activities that reduce the risk of homelessness while households are engaged with or are transitioning from systems; and
3. Activities that target assistance to prevent housing crises that do occur from escalating further and resulting in homelessness. ([United States Interagency Council on Homelessness](#))

**Rapid Exit/ Diversion.** Rapid exit strategies are appropriate after a household has entered emergency shelter or has stayed in an unsheltered setting, and rapid exit strategies serve to help them move as quickly as possible back into housing with the support of services and a minimal level of financial assistance. ([United States Interagency Council on Homelessness](#)). Rapid exits are designed to help someone exit the system as rapidly as possible. Individuals who receive housing through a CES referral are not considered as rapidly exited. Additionally, rapid rehousing is not a rapid exit definitionally, though they sound similar. Diversion strategies and practices assist people to resolve their immediate housing crisis by accessing alternatives to entering emergency shelter or the experience of unsheltered living. This typically occurs at the point people request emergency services, such as entry into emergency shelter, or could take place in a day center or through outreach before a person spends a night unsheltered. Diversion is not a process of turning people away or declining to provide needed services. Rather, diversion offers a valuable service that helps people avoid the experience of being in shelter or unsheltered. ([United States Interagency Council on Homelessness](#))

**Crisis Management.** Crisis management strategies or programs are those that work with individuals who were not prevented from homelessness and also were unable to rapidly exit from their homelessness experience.

### Recognition of a Person within a Program

**Engaged/ Disengaged.** A person is recognized as engaged on the date when interactive client relationship results in a deliberate client assessment or the beginning of a case plan (from Regional Task

Force on Homelessness). Conversely, a person is considered disengaged when the client relationship is no longer interactive, but the individual has not exited.

**Enrolled/ Disenrolled.** A person is recognized as enrolled on the date when enrolled into a program/project in the Homeless Management Information System, but not yet engaged. A person for whom exit destination is not collected but is no longer enrolled is considered disenrolled.

**Exited.** A person is recognized as exited when the person is recorded in the Homeless Management Information System as going to any exit destination listed by the US Department of Housing and Urban Development or the Homeless Management Information System. Please refer to the HUD exit destinations list [here](#) for more information.

**Permanent Housing.** The US Department of Housing and Urban Development defines permanent housing as “a community-based housing model, the purpose of which is to provide housing without a designated length of stay. PH program participants must be the tenant on a lease (or sublease) which must:

- Have an initial term of at least one year
- Be renewable for a minimum term of one month
- Be terminable only for cause”

According to the HUD definition, permanent housing includes Permanent Supportive Housing for persons with disabilities and Rapid Re-housing. The PROS Board expands this definition to include Housing Choice/Emergency Housing Vouchers, placements, or other housing solutions funded by client, third party or at no cost to client.

**Homeless or Recidivated.** A person is recognized as homeless or recidivated to homelessness if considered as such in the Homeless Management Information System.

## Effective Date and Transition

This standard shall be effective 1 January 2023.

Organizations whose fiscal years end between 1 January 2023 and 31 March 2023 may wait for their subsequent fiscal year to begin to effect this standard. For any reports issued between 1 January 2023 and the beginning of an organization’s fiscal year, the organization should minimally disclose its intention to transition to this standard in its following fiscal year.



## Appendix A:

### Basis for Conclusions

#### Statement of the problem of public good reporting in this field

The PROS Board has explored with stakeholders and has subsequently issued a number of regional rules and methods for performance reporting in homelessness, all of which are now organized in the statements of regional public good as governed in this rule. The PROS Board selected this as its first public good “vertical” to explore for the San Diego region because of the persistence of homelessness in the region, the apparent balkanizing of solutions and those seeking solutions in the region, and a seeming acceptance across public funders, private funders, service providers, and even those who have experienced homeless that the region lacks a common lexicon on performance.

#### Overwhelming data, yet lack of reporting consistency across funders and operators

San Diego County and its component areas have a variety of ways to try to measure the current state of homelessness. It is a complex topic and will be covered at a basic level here. As complex as the data systems are, they are still imperfect. What is known is that San Diego has a significant problem in the sphere of homelessness. The region consistently ranks among the highest ten communities in the nation in terms of how many people are experiencing homelessness, recently as high as fourth in the nation.<sup>1, 2</sup> Furthermore, the Regional Task Force on Homelessness (RTFH) reported that according to 2017 data, San Diego had the highest or nearly the highest return to homelessness outcomes among West Coast Continuum of Care areas when measured at 6 months (highest rate measured, 13.66%) and 24 months (2<sup>nd</sup> highest rate, 26.62%, just under Portland Gresham/Multnomah at 26.63%).<sup>3</sup> These data demonstrate that the San Diego region has a significant ongoing problem with helping people get out and stay out of homelessness.

There are several figures relied upon within Continuums of Care to begin to understand the scope of the homelessness problem in the broadest of strokes – point in time count, the annual unduplicated count, housing inventory count, and bed utilization rate.

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<sup>1</sup> Regional Task Force on the Homeless, “Policy Guidelines for Regional Response for Addressing Unsheltered Homelessness and Encampments Throughout San Diego County,” RTFHSD Uploads (Regional Task Force on the Homeless, January 16, 2020),

[https://www.rtfhsd.org/wp-content/uploads/RTFH-Regional-Unsheltered-Policy-Guidelines\\_Final-1.pdf](https://www.rtfhsd.org/wp-content/uploads/RTFH-Regional-Unsheltered-Policy-Guidelines_Final-1.pdf).

<sup>2</sup> Meghan Henry et al., “The 2018 Annual Homeless Assessment Report (AHAR) to Congress PART 1: POINT-IN-TIME ESTIMATES OF HOMELESSNESS,” HUD User Portal (The U.S. Department of Housing and Urban Development Office of Community Planning and Development, December 2018), <https://www.huduser.gov/portal/sites/default/files/pdf/2018-AHAR-Part-1.pdf>.

<sup>3</sup> Regional Task Force on the Homeless, “2019 RTFH Annual Report on Homelessness in the San Diego Region,” RTFHSD Uploads (Regional Task Force on the Homeless, 2019), [https://www.rtfhsd.org/wp-content/uploads/2019/11/Annuallylayout11\\_27.pdf](https://www.rtfhsd.org/wp-content/uploads/2019/11/Annuallylayout11_27.pdf).

A primary method for measuring homelessness in a snapshot is through the annual Point in Time (PIT) Count which, as the term implies, is an all-hands effort to get an accurate count of sheltered and unsheltered people who lack housing stability at a *single* point in time. This is typically done in late January by well over a thousand staff and volunteers and is a mandated practice followed by Federally recognized Continuums of Care, of which the San Diego region is one. The physical count of unsheltered people was cancelled in 2021 due to COVID-19, though the shelter count was still reported. The physical count was delayed by one month in 2022 and the results are still being compiled at the time of this writing. PIT Counts readily acknowledge that resulting figures represent the best effort at assessing that moment in time and is necessarily a representation of the minimum true count at that point in time and does not attempt to reflect the number of people experiencing homelessness throughout the year. The tables to follow were published by the Regional Task Force on Homelessness from the last complete reported count in 2020 and report an approximately 6% overall reduction of people who were able to be counted experiencing homelessness on the identified night from 2019. Further breakdowns show reductions in some regions of the County and increases in South and East County. Efforts to improve data collection and specificity are enhanced nearly every year in order to develop a further understanding of who is experiencing homelessness so that services and supports may be developed and deployed based on the region's specific needs. The field is too complex to begin to cover in this rule. As such, this section will review some very high-level changes over time and provide basic information on the current situation.

It is important to know the data on people who are homeless are further refined to understand populations by such features as geography, race, ethnicity, potential contributing factors to homelessness, age, or other special populations so that services and support may be tailored based on individual or family circumstances and to help the broader system understand the needs of the community and impact of resources. Examples of further descriptive categories include chronicity of homelessness, duration of homelessness, presence of chronic health conditions, veteran status, youth/ Transition Age Youth, seniors, Domestic Violence survivors, disability status, or those experiencing behavioral health or substance use challenges, to name a few.

As one example to look at change over time, the 2014 Point in Time Count reported 8,506 individuals on the identified night in January, 4521 of whom were sheltered and 3985 who were unsheltered.<sup>4</sup> Compared to the figures represented in the tables for 2020, this represents essentially no change in the number of people who are unsheltered and a 19% reduction in those who are sheltered, or a 10% reduction in the total count. The Regional Task Force on Homelessness website provides access to PIT counts from 2014 through 2021.<sup>5</sup> Earlier reports can be found on the Department of Housing and Urban Development (HUD) website.<sup>6</sup>

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<sup>4</sup> RTFH, "2014 San Diego Regional Homeless Profile Summary - Regional Task Force on the Homeless: Summary Results from the San Diego Regional 2014 Point-In-Time Count," RTFHSD Uploads (Regional Task Force on the Homeless, September 24, 2014),

[https://www.rtfhsd.org/wp-content/uploads/2017/07/RHP-2014\\_FINAL\\_9-25-141.pdf](https://www.rtfhsd.org/wp-content/uploads/2017/07/RHP-2014_FINAL_9-25-141.pdf).

<sup>5</sup> RTFH, "Reports & Data." <https://www.rtfhsd.org/reports-data/>.

<sup>6</sup> US Department of Housing and Urban Development, "AHAR Reports | HUD USER." [www.huduser.gov/portal/datasets/ahar.html](http://www.huduser.gov/portal/datasets/ahar.html).

### 2020 Regional Homelessness Count

	2019	2020	% Change from 2019
<b>UNSHELTERED</b>	<b>4,476</b>	<b>3,971</b>	<b>-11%</b>
<b>SHELTERED</b>	<b>3,626</b>	<b>3,667</b>	<b>+1%</b>
<b>TOTAL HOMELESS</b>	<b>8,102</b>	<b>7,638</b>	<b>-6%</b>

COUNTY REGION	People Experiencing Homelessness				
	Sheltered	Unsheltered	Total	% by Region	% Change
City of San Diego	2,587	2,283	4,870	63.7%	-4.0%
North County Inland	232	338	570	7.5%	-27.4%
North County Coastal	238	383	621	8.1%	-18.6%
South County	118	369	487	6.4%	13.8%
East County	492	598	1090	14.3%	3.6%
<b>TOTAL</b>	<b>3,667</b>	<b>3,971</b>	<b>7,638</b>	<b>100%</b>	<b>-5.7%</b>

The above table demonstrates a long-standing pattern, that while the majority of people experiencing homelessness are within the City of San Diego, people are experiencing homelessness throughout every region of the county. Further breakdowns by city and unincorporated areas are available in the annual PIT Count reports.<sup>9</sup> It is generally agreed that the PIT Count is less accurate outside the City of San Diego and especially in unincorporated and more rural areas of the County.

Due to the inherent nature of the challenges of counting individuals who are unsheltered and the limitations of understanding the full scope of the situation based on a given night, the Regional Task Force on Homelessness (RTFH) also reports data gathered throughout the year and then those data are de-duplicated to arrive at an annual count of people served. This information is housed in the central database for the region which the RTFH maintains and which is referred to as the Homeless Management Information System, or HMIS. It is important to note that not all regional providers enter information in the HMIS system. While it is a requirement of agencies receiving many types of Federal funds<sup>10</sup> and some other funders have also adopted HMIS participation as a requirement, it is not universal. The most recent annual performance report covering the period of October 1, 2020 through September 30, 2021 indicates

<sup>7</sup> RTFH, “2020 - We All Count Report - 10,” RTFHSD Uploads (RTFH, 2020), <https://www.rtfhsd.org/wp-content/uploads/2020-WeAllCount-Report-10.pdf>.

<sup>8</sup> RTFH, “2020-WeAllCount-Report-10.Pdf.”

<sup>9</sup> RTFH, “Reports & Data.”

<sup>10</sup> Including The Department of Housing and Urban Development, Housing for People With AIDS/HIV, Health and Human Services, and the Department of Veterans Affairs

that over 21,000 unduplicated people were served (reported as 21.19k).<sup>11</sup> Since this figure does not include people who have not accessed services or people who accessed services through a resource that does not report information in HMIS, it is almost certainly an underrepresentation of the number of individuals who experienced homelessness during those twelve months, a period complicated by the COVID-19 pandemic.

Among many other data points and much statistical analysis conducted by RFTH and other CoCs, another set of key data points reported is the utilization of available beds of all types at a given time. This should help point to the ability to connect people in need with resources, help begin to inform a gap analysis of which services have inadequate supply, and understand patterns of use, among other things. The Housing Inventory County (HIC) in 2020 is depicted below in a line chart over several recent years.<sup>12</sup> It shows an increase in Permanent Supportive Housing (PSH) with 2020 having the highest inventory in five years. This aligns with the national and regional Housing First Policy, which prioritizes permanent housing without requirements for engagement in services. PSH is earmarked for qualified disabled individuals and the need continues to outstrip supply in San Diego's housing market. Transitional Housing (TH) and Rapid Re-Housing (RRH) have opposite trend lines as RRH tends to replace TH beds. Other Permanent Housing (OPH) and Emergency Shelter (ES) beds have similar slow growth trends, while Safe Havens (SH) continues to be a fairly steady and small number for very hard to serve clients. This helps understand the overall bed availability.

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<sup>11</sup> Gaither Stephens, "Regional Taskforce on Homelessness - Community Analysis Dashboard - 10/1/20-9/30/21," Free data visualization software (Tableau Public, May 2, 2022), <https://public.tableau.com/app/profile/gaither.stephens3473/viz/00036-RegionalTaskForceontheHomeless-CAD/CommunityAnalysis>.

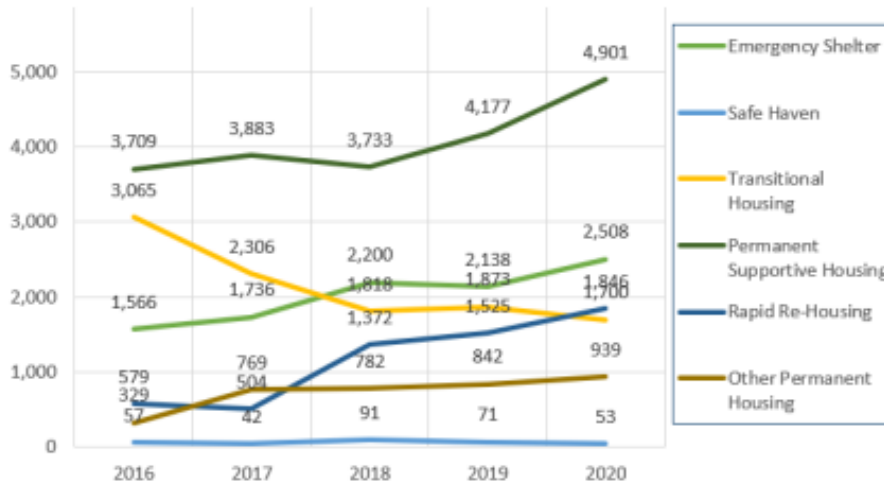
<sup>12</sup> RTFH, "2020-WeAllCount-Report-10.Pdf"

## Sheltered: Housing Inventory Count (HIC)

### Bed Inventory the Night of the Count



This chart provides an overview of changes in the number of total beds/units for homelessness-dedicated housing interventions such as Emergency Shelter (ES), Rapid Re-Housing (RRH), Transitional Housing (TH), and Permanent Supportive Housing (PSH).




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Source: RTFH, 2020 - We All Count Report

The following chart describes the bed usage on the night of the PIT Count. On a night in January 2000 where nearly 4,000 individuals were observed and counted as unsheltered homeless, one might wonder why bed utilization rates were not higher. This is another demonstration of the complexity of the homelessness services system and the people who are homeless. There are individual factors that contribute to this, including that some people do not want to be in a shelter for a variety of reasons, do not want to engage with the system, or perhaps cannot bring their friend, family, pet, or belongings with them to the available bed. People experiencing homelessness are able to exercise freedom of choice in accepting services at all or which services they accept. There are system issues for this including the ability to align the person’s individual eligibility or characteristics up with an available bed (e.g., age, gender, family constellation) or geographic barriers if the bed is inaccessible to the individual who is homeless or he or she does not want to leave the area they are familiar or comfortable with. There also may be issues with the coordinated entry system or tracking individuals who have been approved and are awaiting an available housing resource. It could be a reflection of mismatched resources compared to the population’s needs. There are countless reasons that may be contributing to some beds within the continuum of care being under-utilized.

<sup>13</sup> RTFH, “2020-WeAllCount-Report-10.Pdf.”

**Utilization Rates the Night of the Count**


 Utilization rates are based on the total number of beds available in San Diego County and the percentage of those beds that are in use the night of the Point-in-Time Count. The percentages below show a snap shot of how effectively shelter programs are matching people with beds on any given night.

Year	Emergency Shelter	Safe Haven	Transitional Housing	Permanent Supportive Housing	Rapid Re-Housing	Other Permanent Housing
2016	71%	89%	80%	87%	100%	45%
2017	90%	10%	82%	87%	100%	32%
2018	89%	70%	87%	85%	100%	91%
2019	86%	88%	89%	86%	100%	91%
2020	92%	89%	77%	81%	100%	93%
Acceptable Utilization Rates <sup>14</sup>	75%-105%		80%-105%	85%-105%		

<sup>14</sup>As determined by HUD's recommended methodology.

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Source: RTFH, 2020 - We All Count Report

As evidenced in this very section, there is an overabundance of data with a lack of organizing rules to define performance at the level of an organization where monies are invested. Though there are system-level metrics, there is no system-level entity in San Diego County in control of all homeless service programs. Thus, information needs to be simplified and organized at the level where an investment can be made, which is the operator, or the organization which invests, which may be a public agency or private organization.

**Complexity of the Funding Landscape**

Much like other aspects of homelessness, the funding picture is complicated.

At the highest level, since 1987 and the adoption of the McKinney Act (later to be expanded to the McKinney-Vento Act with the inclusion of protections for homeless children in education) the Department of Housing and Urban Development is the main Federal agency charged with addressing and funding homelessness services. However, homelessness services overlap with other major areas of public service or the social safety net including education, employment, housing resources, public safety, and more. To illustrate this, in 2019, Beta Data Lab analyzed the landscape and flagged 33 federal programs that identified homeless people as beneficiaries whether as the primary target population or as one of the recipient groups.<sup>15</sup> Similarly, a 2019 California State Audit report on the topic indicated that the State had at least nine agencies administering and overseeing at least 41 different programs to end homelessness yet the State was lacking an overarching oversight body and no single entity was responsible for a

<sup>14</sup> RTFH, "2020-WeAllCount-Report-10.Pdf"

<sup>15</sup> US Department of Housing and Urban Development, "Make the Most of HMIS Data - Hud Exchange: A Guide to Understanding Homelessness and Improving Programs in Your Community," Homeless Federal Financial Data – US Treasury Data Lab (US Department of Housing and Urban Development, July 2005), <https://files.hudexchange.info/resources/documents/MakeTheMostOfHMISData.pdf>.

comprehensive strategic plan.<sup>16</sup> In addition Federal and State funding, counties, cities, and private funders also contribute to the field. This makes it a challenge to track the funds and the outcomes in aggregate. The landscape is so complicated that there seems to be no single place where information on funding or data is aggregated to get a complete picture, not only at the federal and state levels, but this is also the case at the county or even city levels.

A more recent change to homelessness definitions, services, and funding at the federal level occurred in 2009 after the housing bubble burst. In addition to reauthorizing some of the McKinney-Vento homelessness assistance programs, elements were added or changed when the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act was signed into law. This law recognized prevention of homelessness, rapid re-housing, consolidation of housing programs, and new homelessness categories to address changing dynamics and best practices. More specifically, it increased the priority of supporting homeless families with children, focused on developing permanent supportive housing, recognized and granted greater flexibility for rural communities, and greatly expanded prevention services.<sup>17</sup>

COVID-19 brought numerous additional changes and funding sources to the sector with its myriad of impacts on people's health, financial implications, child care needs, and overall public health impacts. This was true at the federal, state, and local levels. San Diego County and its component cities increased their efforts and attention to reduce transmission of COVID and address the increased strains on residents that were risk factors for homelessness. Efforts included the use of and purchase of hotels to provide hundreds of non-congregate shelter beds, the conversion of Golden Hall and the Convention Center into emergency shelters with embedded service providers to help with housing navigation among other needs, grants to support homelessness resources for incorporated cities in the county, and the addition of tent shelters and safe parking lots, to name a few.

Private philanthropy, including faith-based philanthropy and service, have also long played a major role in addressing and serving the homeless population. There are some providers in the county who operate almost exclusively on those funds. During the pandemic, resources increased from these sectors and philanthropic foundations streamlined their processes to grant funds and reduced requirements for reporting to prioritize getting funds, services, and housing to those in need. A recent report indicates that some of these changes may continue.<sup>18</sup>

With a problem as significant as homelessness is in San Diego County and throughout the nation, and given the complex and overlapping sectors that feed into homelessness with its diverse population, needs,

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<sup>16</sup> Howle, E., "Homelessness in California The State's Uncoordinated Approach to Addressing Homelessness Has Hampered the Effectiveness of its Efforts.Pdf." Auditor:CA.gov (Auditor of the State of California, February 2021). <https://www.auditor.ca.gov/pdfs/reports/2020-112.pdf>.

<sup>17</sup> National Alliance to End Homelessness, "Summary of HEARTH Act." (National Alliance to End Homelessness, October 2016). <https://endhomelessness.org/resource/summary-of-hearth-act-2/>.

<sup>18</sup> Orensten, N., & Buteau, E. "Foundations Respond to Crisis: Towards Greater Flexibility and Responsiveness." (The Center for Effective Philanthropy, 2020). [http://cep.org/wp-content/uploads/2020/12/CEP\\_Foundations-Respond-to-Crisis\\_Toward-Greater-Flexibility-and-Responsiveness\\_2020-1.pdf](http://cep.org/wp-content/uploads/2020/12/CEP_Foundations-Respond-to-Crisis_Toward-Greater-Flexibility-and-Responsiveness_2020-1.pdf)

experiences, causes, etc., it is hardly surprising that there are so many funding streams and stakeholders. So many aspects of life, community, and government interact in this sphere, and they cannot be disaggregated. It makes it a challenge to identify who is leading the charge and how exactly the charge should be led. It is almost like trying to separate or hierarchically organize requisite biological systems and indicate which takes precedence – the circulatory system or the respiratory system. One cannot survive without blood fueling the body and organs, but if that blood is not oxygenated, it is like having water in the gas tank. The analogies do not stop there, much like in the field of homelessness.

This leaves us with a landscape that cannot be accurately and fully mapped and understood. It is, as stated earlier, a very balkanized landscape of solutions. Dozens of agencies contribute to these services with their own priorities and lenses. Data that are reported are not always consistent or aggregated to tell one overarching story. Population dynamics and outcomes in the big picture of homelessness in San Diego County cannot be fully understood without cooperation among all those involved.

## The Ecosystem of Homelessness Services and Performance Reporting

In order to receive HUD Funding, a self-defined region or collaborative or stakeholders in the field must organize under an umbrella referred to as a Continuum of Care (CoC). San Diego County has done this and is organized under the Regional Task Force on Homelessness (RTFH). RTFH then is responsible for creating and maintaining the HMIS database, also a mandate from HUD, to aggregate required and optional data on all services, providers, and recipients connected to federal funding. The mandate of participation in HMIS creates this most unifying force in the realm of homelessness data in the country. RTFH then must comply with a myriad of reporting and planning requirements in line with federal requirements. Further, these aggregated reports are what RTFH must use to report to federal agencies the statistical state of homelessness needs and services in the region to gain access to federal funds.

### Homelessness Data Systems in San Diego

In 2001, Congress mandated the U.S. Department of Housing and Urban Development (HUD) to collect unduplicated data on the population of homeless people for each locality<sup>19</sup> (Center for Social Policy, 2002). Ultimately, by 2004, HUD had overseen the creation of the Homeless Management Information System (HMIS) in order to allow local level data to be collected by providers<sup>20</sup> (HUD, 2021). To ensure participation in this central data system, the most efficient way to reduce duplication and get the most information on the population, ultimately all service providers receiving funding from HUD, the Office of HIV/AIDS Housing, the Health and Human Services (HHS) Department, and the Department of Veterans Affairs (VA) were required to participate in the HMIS system. To further support the development of shared local level aggregate data that is unduplicated, communities and regions were encouraged to join together within natural and logical boundaries to form a Continuum of Care (CoC) which could be cities, one or more Counties, or even at the State Level. As the system developed, it was collective reports from CoCs which were submitted to give a regional, comprehensive picture of the population, needs, and

<sup>19</sup> Howle, “Homelessness in California The State’s Uncoordinated Approach to Addressing Homelessness Has Hampered the Effectiveness of Its Efforts.”

<sup>20</sup> US Department of Housing and Urban Development, “FY-2022-HMIS-Data-Standards-Manual.Pdf.” HUD Exchange Info (US Department of Housing and Urban Development, December 2021).  
<https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Standards-Manual.pdf>



utilization when applying for Federal Funding so that funds were triaged and allocated according to need demonstrated in HMIS. California has 44 CoCs, of which San Diego is one and it is organized under the umbrella of the Regional Task Force on Homelessness (RTFH). RTFH is responsible for maintaining the HMIS system in compliance with Federal Mandates and in a manner that meets the needs of the local CoC, including the Coordinated Entry (CE) system which is intended to support triaging clients and maximizing utilization of available resources with the least disruption or delay.

The Homelessness Management Information System (HMIS) is the database that has been created and mandated by public funders for use by service providers that receive public funds for well over a decade. The San Diego region is organized as a Continuum of Care with the Regional Task Force on Homelessness as the Lead Agency for the local HMIS. Substantial work goes into often annual updates to the data fields and programming logistics to continue to refine the HMIS system so that it feeds into the most accurate local and Federal data sets. While use of HMIS is not mandated by program providers who do not receive public funds, they are reportedly both welcomed and encouraged to participate in HMIS, though it seems to be the rare non-mandated organization that participates for a variety of reasons, not the least of which is resources – namely time and money. Other funders, public and private, may themselves stipulate participation in HMIS as a condition of funding.

While many providers are part of the HMIS system, most providers also operate their own data systems as HMIS may be a necessary component, but the shared HMIS system is not sufficient to cover the data and service tracking needed for each individual organization. HMIS in San Diego is currently provided through a service agreement between RTFH and Clarity. Organizational service providers may hold their own contract with Clarity to meet their organizational record needs; however, organizations may use any other variety of vendors or programs developed in house to manage this. As mentioned, there are service providers in San Diego that are not required to enter into HMIS. Some of those providers may choose to, others may work with RTFH for some unidirectional or bidirectional information exchange, and others operate fully outside the HMIS system.

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

The PROS Board acknowledges that, at the point of issuance of this general organizing rule to define how statements of regional public good are developed, numerous public and private funders already require their own reporting with measurements and recognitions that are different than what is presented here. It is the expressed desire of the PROS Board that the open and collaborative processes used to develop the regionally-accepted public good measurement and reporting rules, now organized in these statements of regional public good, will reduce the aggregate administrative burden of organizations in scope.

## Appendix B

### Example Specific Applications of this Standard

#### Public or Private Parties Granting Monies to Service Providers

With these simplified and standardized statements of regional public good, an organization – whether private or public – could use these statements, especially if independently audited, to understand performance at an organizational level and to evaluate the effectiveness and efficiencies of the monies invested. There is a sufficient balance of metrics, developed in collaboration with all stakeholders, to provide enough nuance to make holistic judgments of an organization while reducing the risks of having irrelevant information that creates cognitive “noise” and “cherry picking” of performance measures.

## Appendix C

### Illustrative Examples