

Exposure Draft

Standard for Public Good Evaluation and Reporting in Homelessness Services Client Feedback

2024-ED-002

This Exposure Draft of a Public Good Measurement and Reporting Standard is issued by the Public Regional Outcomes Standards Board.

Written comments should be addressed to

Research and Technical Director
Serial Reference No. 2024-ED-002

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Comment Period Concludes: 10 May 2024

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, Serial Reference No. 2024-ED-002
- Sending a letter to “Research and Technical Director, Serial Reference No. 2024-ED-002, San Diego Public Regional Outcomes Standards Board, San Diego Taxpayers Educational Foundation, 2508 Historic Decatur Road, San Diego, CA 92106.”

The public comment period for this exposure draft ends on 10 May 2024. All comments received are part of the PROS Board’s public file and are available at www.sdcta.org/sdprosboard.

Purpose of Exposure Draft

The purpose of this exposure draft is to disclose the scope, area, and function of a regional measuring and reporting standard on client feedback in homelessness services. Having a measurement and reporting standard on client feedback can assist in funder evaluations of service providers' operations.

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 outcomes in public services on the due diligence of the PROS Board and its Working Groups that 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 good.

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 privately and publicly funded organizations which took part in our working group discussions on homelessness, or those members of the public and/or stakeholders who communicated their thoughts and experience via previous surveys.

This proposed standard on *Evaluation and Reporting in Homelessness Services* exists to address a community-acknowledged need to assure the authentic interest of service providers in the feedback received from their clients. According to the funders who participated in the working group, client feedback is also assistive in understanding "market demands;" that is to say, at a macro-level, trends in feedback could be a leading indicator that a service type is either over or under procured. It's also important to note that all working group members concurred that authentic solicitation of client feedback is also empowering to the clients, and such empowerment only enhances the value of the services they are receiving to get to self-sufficiency.

This document covers all necessary related aspects of this proposed standard, including purposes, scope, and expectations on types of data and levels of participation in data sharing, as well as exceptions on relevant data and those expected to participate. The appendices provide background information regarding the needs for standards, as well as case examples of standard implementation.

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Objective

The PROS Board issues these standards on client feedback in homelessness services in the San Diego region to increase the likelihood an individual experiencing homelessness will end their homelessness permanently and as efficiently as can be reasonably expected in our region.

Intended Regional Effects of Issuing This Standard

Homelessness service organizations can use compliance with this standard to assure investors that they are authentically interested in the feedback of clients. The genuine solicitation of feedback is very empowering for and of clients, which itself encourages behaviors to achieve self-sufficiency.

Investors, including public and private funders, can use compliance with this standard to review an organization's evidentiary basis for methodical changes and feel assured that the recipients of their investments are providing objective recommendations on the optimal levels of investment.

Other Regional Purposes Outside the Focus of This Standard

None.

Standards of Public Good Accounting and Reporting

Scope and Scope Exceptions

These standards apply to homelessness service and housing programs, including organizations conducting interventions that focus primarily on supporting individuals at risk of or experiencing homelessness. Organizations in scope include those conducting iterative engagement with the goal of moving clients toward achieving material goals. Essentially, organizations conducting services or providing material assistance with a housing focus are in scope.

These standards apply exclusively to organizations sufficiently engaged in addressing homelessness to have either a finance committee in their governance or an independent financial or performance auditing requirement, whether externally required or self-imposed.

Organizations excluded from these standards are those who engage with persons at risk of or experiencing homelessness but do not intend to build trusted relationships with them in the aim of ending their homelessness condition permanently. For instance, an organization solely dedicated to research on homelessness does not fall within the scope of this standard; while that organization may have the opportunity to build trust, that is not their stated intention. Furthermore, a law enforcement organization would be outside the scope of this standard if its main purpose in its engagement with persons experiencing homelessness is enforcement of local rules and not trust building or subsequent referral to

services or housing. Finally, a street medicine outreach team without any service coordination component is not in scope.

Key Terms

None

Recognition – Initial and Subsequent Measurement

Organizations in scope shall demonstrate a good faith effort that they are collecting client feedback meaningfully and that they are genuinely interested in such feedback.

An organization shall recognize its good faith effort when these conditions are met:

1. The organization has a diversity of mechanisms to collect client feedback;
2. The organization has a managerial process that periodically reviews such feedback and makes adjustments to service provision; and
3. The organization leverages the feedback in a timely manner to provide their investors assessments on whether their services are over or underprovisioned.

Presentation on Performance or Financial Reports

In the Statements of Regional Public Good

Organizations in scope shall report the recognition of good faith effort conspicuously in the HOUS-Ma-[Final Rule Number] note of any statements of regional public good.

Disclosure Requirements

When reporting pursuant to this standard, the organization must disclose the methods by which it collected feedback, and for each method, the proportion of clients served in the relevant time period who provided feedback.

Additionally, the organization should disclose what changes to operations were made as a result of reviews of client feedback. If none, the organization should minimally state that client feedback was reviewed but did not result in any operational changes.

Finally, the organization should also disclose whether they recommended to their investors, based on client feedback, any adjustments to optimize their investments.

Effective Date and Transition

This standard shall be effective 1 January 2024.

Appendix A: Background Information

Basis for Conclusions

The working group discussed two groups of questions to examine why any measurement or reporting around client feedback is necessary, and if necessary, why valuable.

1. For investors in homelessness services: Do you typically know how contracted organizations collect feedback? What else would be helpful for you to know about feedback collection? What information would you "trust" about any client feedback information reported by your contractors?
2. For the service providers: How do you collect client feedback? How do you take action based on feedback you've collected from clients? What does the feedback you collect normally look like (in terms of completeness and quality)? What concerns you about the feedback you get, i.e., what makes you less trusting of the raw feedback?

In discussing the questions in group 1, the public investors noted that a federal requirement to report client feedback, which is partially why they want information on client feedback in the first place, has partially to do with the federal government's desire to have independent evidence that services were completed. At the regional level, the risk an investor would finance fraudulent activity is so much lower and more likely to be easily discovered, and the spirit of the federal government's informational need is not of material concern. That said, the investors noted they would like to know that management actually took the feedback and made operational changes, and they also noted that the feedback is partially helpful in determining market dynamics (i.e., real demand for certain types of services versus real supply).

The service providers noted that client feedback ought to come in a variety of forms, as single quantitative methods (like a single survey) do not capture context, and the results could be biased based on who, how, etc., the feedback is gathered. They expressed that when feedback is substantive, they have evidence to consider some operational or methodological changes – but it is possible that existing contract provisions either would not allow such changes or that the pricing that exists in the contracts do not finance such adjustments.

As both investors and operators came to the conclusion that client feedback can be very informative in the grantor-grantee relationship, consistent information needs to be disclosed. The working group came to the conclusion that the raw feedback itself was not valuable, but rather assurances that there was a good faith effort to collect meaningful feedback in order to make operational decisions, which have financial implications.

As a philosophical consideration, all working group participants concurred with the contributions of the individuals who have experienced homelessness that the collection of feedback is empowering to those who are served. This reporting standard on client feedback, in its current form, has inherent value that exceeds the de minimis costs created for operators as a result of the disclosures required.

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

None.

Appendix B

Illustrative Examples for Reporting Possibilities

The working group believes this standard is sufficiently clear and simple that an example is unnecessary and potentially overly prescriptive.

Appendix C

Notes to Help Readers of Performance Reports Following This Standard

Potential Investors in a Service Provider

Given a consistent refrain in this space that resource levels are inadequate, investors should be able to reference the disclosures required in this standard to determine if such refrains are evidenced or perhaps overstated. Furthermore, the disclosures help an investor to substantiate whether an operator is genuinely interested in client feedback, which may be a philosophical concern of the investor.