

Standard for Public Good Evaluation and Reporting in Diversity, Equity, and Inclusion in Homelessness Services

Rule # PROS-HOUD-Ma-506

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

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Objective

The PROS Board issues these regional measurement and reporting standards on diversity, equity, and inclusion (DEI) to decrease the influence of demographic factors included in this standard on the outcomes of people experiencing homelessness in San Diego County. Additionally, these standards are issued to standardize the reporting of diversity, equity, and inclusion in homelessness services in order to create transparency and allow for streamlined tracking of regionally accepted indicators of DEI.

Intended Regional Effects of Issuing This Standard

The balanced set of metrics included in this standard will create increased transparency through standardized reporting. The standardization of reporting on DEI will allow for more strategic allocation of funding from funders who care about DEI and are interested in seeing DEI practices from their grantees. Organizations who report in accordance with this standard will be able to demonstrate their genuine efforts to assure equitable client outcomes, thus enabling funders to evaluate outcomes in the context of resources and effort which organizations in scope have invested in DEI.

Similarly, organizations in scope should be able to use this balanced set of metrics to make strategic and operational decisions about DEI efforts. Specifically, these balanced metrics will help organizations in scope to identify areas of strong performance for potential increased focus to build on what works. These metrics will help organizations identify areas of weak performance to decide if, in the event the area of weak performance is internal, whether operational improvement is necessary.

Other Regional Purposes Outside the Focus of This Standard

The PROS Board acknowledges that existing inequities in the metrics included in this standard are likely in part the result of centuries of systemic discrimination against protected groups. This standard does not address DEI issues outside of the homelessness space; however, the PROS Board acknowledges that DEI issues in homelessness services cannot be perceived in a vacuum as the exclusive responsibility of organizations in scope and/or their funders.

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.

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

Exit or Exited. Exit represents the end of a client's participation with a program. The exit date should coincide with the date that the client is no longer considered to be participating in the program.

Exit Destination. A client's subsequent destination after being exited from the program in which they were enrolled. For a complete list of possible exit destinations, see the US Department of Housing and Urban Development's [Housing Destination Summary](#)

Recognition – Initial and Subsequent Measurement

Organizations in scope shall initially and subsequently recognize demographic breakdowns of their clientele based on all the demographic indicators included in their annual performance reports.

Presentation on Performance or Financial Reports

The PROS Board understands that at this early stage of the development of regionally accepted public good measuring and reporting standards, there are no standardized public good reporting formats. In other words, there is no public good reporting analogue to the balance sheet or to a profit and loss/activities statement and thus no standard report where the disclosures or presentation of public good reports that this rule requires can yet be placed. Hence, this section creates additional notes or commentary through existing standardized financial or other performance reporting until such standard reporting formats can be developed. In the interim, this rule also offers an appendix with illustrative examples that will change in future versions of this rule.

In the Notes of Financial Statements

Organizations in scope shall report conspicuously in the notes of any financial statements the following measurements:

1. The demographic breakdown of staff in the categories used in organizations' annual performance reports
2. The demographic breakdown by percent of the clientele serviced in the categories used in organizations' annual performance report

3. The demographic breakdown by percent of clients who exited to each exit destination available in HMIS

If conducting street outreach in a sufficiently large geographic area that impacts availability of services, the organization may elect to provide the above information additionally into geographic subdivisions. Such geographic subdivisions, if used, should be identifiable in public records, like zip codes, school catchment zones, a city's subdivisions, etc.. It should not be a geographic subdivision that is proprietary.

In Any Performance Reporting

Organizations in scope shall disclose their active plan(s) on DEI as of the date of the financial position.

If an organization in scope publishes publicly available performance reports, like in an annual report, separate from financial statements, then the organization shall present the information in the previous subsection.

Disclosure Requirements

When reporting pursuant to this standard, the organization must disclose the methods by which it determined such measurements and the geography it serviced during the reporting period. When independently audited or reviewed, the auditor or reviewer should make an evaluative statement whether those methods meet the intent of this standard.

Of note, this standard does not specify exactly where within reports or which notes on financial statements an organization must provide the information or disclosures required in this standard. See Appendix B for example applications of this standard.

Effective Date and Transition

This standard shall be effective 1 July 2023.

Organizations whose fiscal years end between 1 July 2023 and 31 October 2023 may wait for their subsequent fiscal year to begin to effect this standard. For any reports issued between 1 July 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: Background Information

Basis for Conclusions

Inclusion of Demographic Characteristics

Representatives of homelessness service providers in PROS Board working groups have expressed anecdotal accounts and discussed statistical representations of inequities in homelessness services, including the population falling into homelessness and the exit destinations and long-term outcomes of people experiencing homelessness. While much of the research and discussion has been focused on racial inequities, and that is where we expect to see the greatest disparities, it is crucial to investigate other possible disparities. Stakeholders throughout the region agreed that, for this reason, it is logical to include all of the demographic characteristics for which data are accessible in this standard.

Reported Metrics

Working group members agreed that it is crucial to understand how disparities present at different points in clients' journeys through the homelessness services system. Documenting disparities between demographics of the total population experiencing homelessness and the population served by a single provider will prompt organizations in scope to interrogate possible bias in their outreach efforts or among frontline workers. Documenting demographic breakdowns by exit status will give providers insight into possible bias in their operations. For example, if Black clients are exiting into permanent housing at a much lower rate than white clients, then an organization might be prompted to investigate possible bias in their case management or client services.

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

Some stakeholders have expressed a desire to incorporate reporting on long-term client outcomes by demographic group. This request came from the idea that disparate treatment of clients by organizations in scope could result in some clients not being set up for success in permanent housing, leading them to fall back into homelessness at higher rates. While this is certainly possible, it is likely that any disparities in long-term outcomes are the result of discrimination outside of the homelessness services system. For example, housing or employment discrimination may create challenges for clients in maintaining permanent housing. PROS-HOUD-Ma-504, Standard for Public Good Accounting and Reporting on Long-Term Housing Outcomes of Serviced Clients in Homelessness Services, addresses general long-term client outcomes but does not include demographic breakdowns.

Appendix B

Example Specific Applications of this Standard

Municipal Agencies conducting homelessness services

Municipal agencies in scope will need to consider in what financial and performance reviews the reporting pursuant to this standard are included. It seems wholly appropriate that, if addressing homelessness is a significant priority of elective office holders, then these measurements and reporting ought to be completed for Comprehensive Annual Financial Reports (ACFRs). Certainly these measurements and reports ought to be completed for reports of departments, like law enforcement if engaged deliberately in outreach services, or subordinate agencies, where applicable.

Service Providers

At a minimum, service providers should detail the information pursuant to this standard in their audited financial statements and any annual performance reports.

Illustrative Examples for Reporting Possibilities

The following table describes the columns, or metrics, that should be present in reports produced in accordance with this standard. This table includes only census racial groups due to space limitations; however reports issued by organizations in scope should include all demographic indicators included in annual performance reports, as per the Recognition section of this standard. Organizations in scope should also include a complete list of possible exit destinations.

	% white	% Black or African American	% American Indian or Alaska Native	% Asian	% Native Hawaiian or Other Pacific Islander	% Some Other Race
population serviced						
population exited to permanent housing						
population exited to transitional housing						
population exited to unsheltered homelessness						

population autoexited						
staff						

Appendix C

Notes to Help Readers of Performance or Financial Reports Following This Standard

Potential Investors in an Service Provider

When considering initial or further investment in a service provider, there are several variables that an investor might consider. All variables should be considered in the context of the population in the region served. For example, metrics reported by an organization conducting services exclusively in the City of San Diego should be examined in the context of that city's population. For this region, the PROS Board and stakeholder working groups request that investors examine reporting metrics in a specific context. Information reported on point 1 of "In the Notes of Financial Statements" should be compared to US Census data for the region served. Data reported on points 2 and 3 of "In the Notes of Financial Statements" should be compared to HMIS data for the region serviced. If HMIS data for the region is not accessible, then investors should use Point in Time Count (PIT Count) data, but they should be aware of its limitations and challenges in drawing conclusions from it. Working group members agree that PIT Count data is likely to be a floor, rather than an accurate measurement, of the number of people experiencing homelessness in a region. To the knowledge of the PROS Board and working groups, there is no evidence of systematic undercounting of certain demographic groups in the PIT Count; however, working group members speculated that there may be undercounting of Black people who, due to negative or even physically harmful experiences with law enforcement, may be hesitant to talk to officials conducting the PIT Count. There is also reason to believe that families and youth would be undercounted, as they are more likely to be sheltered experiencing homelessness or doubled up with family or friends. PIT Count data is limited in its reliability due to methodological changes across years. In [2021](#), for example, 40% of communities did not conduct a complete count of people experiencing unsheltered homelessness due to COVID-related concerns.

Investors should consider all reported metrics for whichever demographics about which they are most concerned. For example, an investor focused on racial equity might look at statistics for racial groups while an investor focused on improving conditions for veterans might examine disparities between veterans and non-veterans. Regardless of their demographic groups of interest, investors are encouraged to look at both the population served and client outcomes. The two metrics should not be considered separately, as the demographics of the clients an organization serves may lend insight into the rationale behind their outcomes.

Investors should examine reports made in accordance with this standard with knowledge of program eligibility requirements. For example, programs that exclusively serve veterans will have different demographic breakdowns by nature than organizations serving both veterans and non-veterans

Board Directors or Executives of Organizations in Scope

When considering strategic or operational decisions, there are several pieces of derivable information that a board director or executive could use. Board directors or executives may compare total population demographics against demographics of the population served to understand the extent to which bias might exist among frontline staff. If disparities are found, executives might consider hiring more frontline staff from underrepresented demographics or focusing on those demographic groups in DEI training. Board directors and executives should also look at demographics of exit destinations to understand areas where they might examine bias in service delivery. For example, if a significantly higher percent of clients exiting to unsheltered homelessness are Black than that of clients exiting to permanent housing, executives might interrogate disparities in services provided to Black clients or incorporate additional DEI training around Black people experiencing homelessness.

Post-Public Comment FINAL DRAFT