

HMIS ROI Need-to-Know for Street Outreach

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Street outreach providers who are not "protected" (meaning they do not share information outside of their agency within the HMIS) do have some unique rules regarding the requirement to gather HMIS ROIs and data entry. This guide is intended to explain, in detail, what the differences are for street outreach providers and when an HMIS ROI is and is not required.

This guide is intended to supplement our general [HMIS Release of Information](#) guide.

Note: In general, ICA does strongly encourage street outreach projects which are not protected in HMIS to gather an HMIS ROI or request the record be locked down unless the agency is confident that the client record contains absolutely no identifying information.

Challenges in street outreach data collection

HUD acknowledges that gathering client information for HMIS use with clients living on the streets can be challenging, and has therefore developed a data collection process which allows for data to be collected over multiple interactions with clients.

A street outreach project is likely to encounter difficulty engaging homeless persons. Street outreach projects may record a project start with limited information about the client and improve on the accuracy and completeness of client data over time by editing data in an HMIS as they engage the client. The initial entry may be as basic as the project entry date and a de-identified name (e.g., "Redhat Tenthstreetbridge") that would be identifiable for retrieval by the worker in the system. However, Street Outreach projects are prohibited from establishing protocols that only require outreach workers to collect minimal client data. Over time, outreach workers must attempt to collect all data required for street outreach projects and edit recorded data for accuracy (e.g., replacing "Redhat" with "Robert") as the worker learns more about the client.

[ESG Program HMIS Manual \(June 2020, page 12\)](#)

Minimum data collection for record creation

As noted in the quote above, the initial entry into the system may contain very little information. At minimum, ICA asks street outreach projects to collect and record the following items at the time of first contact with the client in order to be able to run community level reports.

- A de-identified name developed by the project (e.g., "Redhat Tenthstreetbridge")
- An estimated date of birth (in order to distinguish whether the individual is a child, youth, or adult)
- Project start date (the date of the first contact with the client)
- Current living situation (i.e., place not meant for habitation)

- Prior living situation (e.g.; rental by client, no ongoing housing subsidy; emergency shelter; place not meant for habitation)

What is considered identifying information?

Identifying information includes, but is not limited to, the following items. A description of the data quality options for each are below, along with whether or not the data requires the presence of a signed HMIS ROI:

- The client's name
- The client's date of birth
- The client's Social Security Number
- Any combination of information from within the client record that could be utilized to identify the client

When is a name considered identifying?

Name info provided	Example	Name data quality	Considered identifying?
A full first and last name	John Smith	Full name reported	Yes
Any portion of the client's name (i.e., first name only), with the rest of the name made up	John EllisPark	Partial, street, or code name reported	Yes
A nickname, street name, or alias provided by the client or known to the outreach worker	Park Johnny	Partial, street, or code name reported	Yes
None, such as a name developed by outreach worker solely for purpose of identifying the client record in HMIS	GreenHat EllisPark	Client doesn't know, or Client refused, or Data not collected	No

When is a date of birth considered identifying?

Date of birth/ age info provided	Example	Name data quality	Considered identifying?
A full date of birth	03/16/1987	Full DOB reported	Yes
A year of birth provided by the client or known to the outreach worker	01/01/1987	Approximate or partial DOB reported	Yes
An age provided by the client or known to the outreach worker	01/01/1986	Approximate or partial DOB reported	Yes
None, such as an approx. DOB by outreach worker solely for purpose of identifying the client record in HMIS	01/01/1990	Client doesn't know, or Client refused, or Data not collected	No

When is a Social Security Number (SSN) considered identifying?

Always. If any portion of an SSN is provided by the client, it is always considered identifying. No made up information should ever be entered into the SSN field.

What else is considered identifying?

Any combination of information that could be used to identify the client or household is considered identifying. It is possible to identify clients using a combination of data that may not technically be identifying on its own. Some potential examples where combinations of data could be utilized to identify a client include:

- The area where the client is staying or can be found along with the client's approximate age, race, ethnicity or gender
- Any contact information (email addresses, phone numbers, street addresses) for the client or an emergency contact for the client
- Client notes that include specific details, such as types of disabilities, appearance, or behaviors
- Information about income or benefits the client receives along with the client's age, race, ethnicity or gender

When must a record be locked?

Presence of *any* identifying information without an HMIS ROI

If there is *any* identifying information within the client record and there is NOT a signed HMIS ROI, the record must be locked. If it is unclear whether the record contains identifying information, it should be assumed that the record's information could be identifying and therefore will need to be locked.

Remember that any clients entered into "protected" projects are automatically locked. If you're unsure whether your project is protected, we encourage you to [reach out to the helpdesk](#).

Changing the client record lock

There are some circumstances in which changing the lock status of the client record may be necessary or an option.

Locking a client record

As street outreach workers continue to engage with the client, it is expected that they will be gathering identifying information from the client. If a client record was initially created without any identifying information and was not locked down by ICA, but the street outreach worker gathers any identifying information *while still not gathering a signed ROI*, the street outreach worker **must** [contact ICA to request the record be locked](#) before entering any of the identifying information to the record.

If the street outreach worker does gather a signed HMIS ROI at the same time as the newly provided identifying information, then the record does *not* have to be locked down. As always, the outreach worker will need to ensure that the HMIS ROI is properly documented within the HMIS.

Unlocking a client record

If a client record is initially locked down because the agency needed a client record in which they could enter identifying information without an HMIS ROI, but later gathers the HMIS ROI, the record can be unlocked in most circumstances. In order to request a record be unlocked, an email containing the client's ServicePoint ID and the name of the release form the client signed must be [sent to the helpdesk](#). The helpdesk will then review the client record to determine if there are any reasons the record cannot be unlocked for other reasons, and will unlock it as long as all requirements to unlock the record are met.

Generally, there is not a requirement to unlock a record that was previously locked down. However, ICA knows that some agencies do prefer to have the records re-opened and we are always willing to at least look into the possibility of doing so.

Other frequently asked questions

What if I still have questions?

This guide is intended to supplement our general [HMIS Release of Information](#) guide, so we encourage you to review that if you have other questions. However, if that doesn't address your

questions or if you have other questions, we encourage you to [reach out to our helpdesk](#) for assistance.

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