



Guidelines

FOR THE

Coordinated Entry Diversion Pilot Program August 1, 2020 – June 30, 2021

Version 1
August 2020

Contents

1	Grant Basics	4
1.1	Overview and Purpose.....	4
1.2	Fund Source	5
2	Program Overview	6
2.1	What is Diversion?	6
2.2	What is a Phased Assessment?	6
3	Evaluation and Learning Activities	8
3.1	Required Training	8
3.2	Recommended Training	8
3.3	Peer Learning.....	8
4	Program Requirements	9
4.1	Nondiscrimination	9
4.2	Low Barrier Services	9
4.3	Prohibitions.....	9
4.4	Accessibility	10
5	Data Collection Requirements (HMIS)	11
5.1	Consent for Entry of Personally Identifying Information	11
5.2	Anonymous Records.....	11
5.3	Data Quality	12
6	Program Eligibility	13
6.1	Program Eligibility Summary	13
6.2	Housing Status Eligibility Criteria:.....	13
6.3	Income Eligibility Criteria.....	14
6.3.1	Income Eligibility Documentation.....	14
7	Eligible Activities and Expenses	15
7.1	Administration	15
7.2	Program Operations	15
7.3	Flex Funding.....	16
7.4	Ineligible Use of Funds.....	17
8	Administrative Requirements	18

8.1	Grant Management	18
8.1.1	Changes to Guidelines	18
8.1.2	Commerce Monitoring.....	18
8.1.3	Subgrantee Requirements	18
8.1.4	Subgrantee Risk Assessment and Monitoring	18
8.2	Fiscal Administration	18
8.2.1	Budget Caps	18
8.2.2	Reimbursements.....	18
8.2.3	Budget Revisions.....	19
9	Appendix A: HMIS Data Quality	20
9.1	Completeness	20
9.2	Timeliness	21
9.3	Accuracy.....	21
9.4	Consistency.....	22

1 Grant Basics

1.1 Overview and Purpose

The Coordinated Entry Diversion Pilot Program provides funding for Diversion services at Coordinated Entry (CE). The purpose of the funding is to:

- Increase capacity of local CE processes in order to provide Diversion services as part of a phased assessment approach.
- Expand capacity of local CE process to provide Diversion services to communities and populations traditionally underserved by CE and disproportionately impacted by homelessness.
- Test the effectiveness of the Diversion services at reducing in-flow to the homeless crisis response system, including reducing waitlist placements.
- Understand the barriers and solutions regarding incorporating Diversion strategies in CE processes.

The Housing Assistance Unit at the Department of Commerce administers state and federal funds to support homeless crisis response systems in WA State. The Coordinated Entry (CE) Diversion Pilot Program is a critical resource in the crisis response system.

People living unhoused or experiencing a housing crisis become stably housed when the system is:

- Low barrier (see section 4.2), trauma-informed¹, culturally responsive² and Housing First³ oriented
- Focused on problem solving and personal advocacy to help people identify practical solutions based on their own available resources.

We expect Commerce grantees, including county governments and nonprofits, to be leaders in their crisis response systems, facilitating partnership 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 cannot simply rely on standard business practices to address inequity. Grantees have the responsibility to ensure all people eligible for services receive support and are served with dignity, respect and compassion regardless of circumstance, ability or identity.

This includes marginalized populations, Black, Native and Indigenous, People of Color,

¹ 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.

² 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.

³ <https://player.vimeo.com/video/380600251>

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.

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

1.2 Fund Source

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

2 Program Overview

This program funds Diversion service strategies as part of a phased approach to the community Coordinated Entry process. Diversion service strategies are targeted to populations identified as traditionally underserved by the Coordinated Entry system, and disproportionately impacted by homelessness.

Grant documents and resources can be found on the program webpage:

<https://www.commerce.wa.gov/coordinated-entry-Diversion-pilot-program/>

2.1 What is Diversion?

Diversion is a service strategy that uses problem-solving conversations and personal advocacy to help a household 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 a one-time conversation, negotiation with the household's family or property manager, or assistance in navigating mainstream resources. To help ease the transition out of crisis, Diversion services offer households a flexible combination of short-term services and one-time financial assistance (if needed).

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

2.2 What is a Phased Assessment?

Assessment is the process of gathering information about a person with a housing crisis in order to understand the person's immediate needs and to connect them to appropriate resources or interventions. Frequently, assessment at CE includes incredibly long and intrusive interviews, even if they were only seeking temporary emergency assistance. 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 of CE. 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.

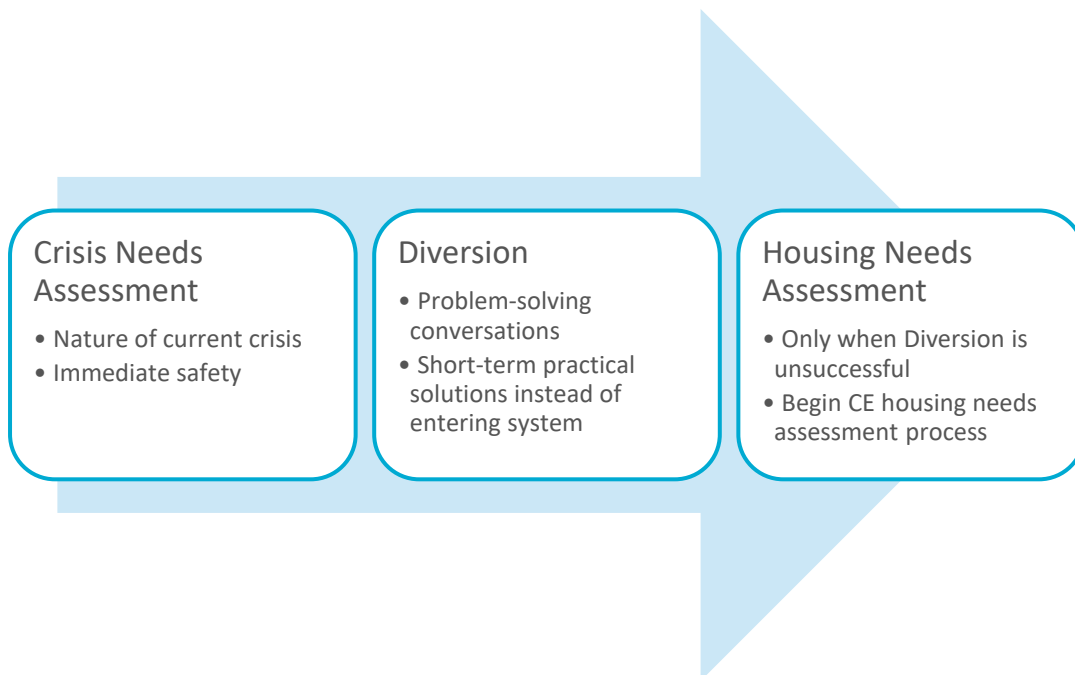
Phased assessment will help grantees assist people with their immediate needs, while also limiting long periods of contact. It can also help manage a higher volume of calls and inquiries. Phased assessment can be flexible; the components of phased assessment can be done over a span of a couple of days, a week, or in 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, 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 to stay with?
 - Do you need help with mediation to stay where you are?
 - Can flexible funding assist with this?
- 3. Housing Needs Assessment:** When it becomes clear that Diversion is not successful and self-resolution will not occur, the grantee can refer the client to the CE housing needs assessment process (gathering the basic information needed to make eligibility, prioritization and referral decisions).



3 Evaluation and Learning Activities

Grantees are required to participate in monitoring, evaluation, on-going peer learning and training activities provided by Commerce.

3.1 Required Training

Direct service staff positions funded by the program and their direct supervisors are required to participate in a virtual Diversion training provided by Building Changes in the Fall of 2020.

Additionally, direct service staff positions funded by the program and their direct supervisors are required to attend the following standard [Homeless Services Training](#) provided online and free of charge by Commerce:

- Introduction to Housing First
- Progressive Engagement for Programs and Systems
- Working with Survivors of Domestic Violence
- Introduction to Problem Solving (Diversion)

3.2 Recommended Training

Direct service staff positions funded by the program and their direct supervisors are recommended to attend the following [Homeless Services Training](#) provided free of charge by Commerce:

- Mental Health Training
- Trauma Informed Services
- Trauma Responsive Services
- Racial Equity in Homeless Services
- LGBTQ+ Competency

3.3 Peer Learning

The pilot program cohort will engage in collaborative peer learning activities and can expect to attend monthly virtual learning circles to share successes and challenges of program implementation. Individualized technical assistance will also be provided to grantees as needed.

4 Program Requirements

4.1 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 must comply with the [Federal Fair Housing Act](#) and its amendments as it now reads or as it may be amended. The Fair Housing Act currently prohibits discrimination because of race, color, national origin, religion, sex, disability or family status. The Fair Housing Act prohibits enforcing a neutral rule or policy that has a disproportionately adverse effect on a protected class.

Grantees serving households with children must serve all family compositions. If a grantee operates gender-segregated facilities, they must allow the use of facilities consistent with the client's gender expression or identity.

Local nondiscrimination laws may include additional protected classes.

4.2 Low Barrier Services

Grantees are required to provide low barrier services, which includes 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 a history of victimization
- The type or extent of disability-related services or supports that are needed
- Lacking ID or proof of U.S. Residency Status
- Other behaviors that are perceived as indicating a lack of "housing readiness," including resistance to receiving services

4.3 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 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.

4.4 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 number, 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.

5 Data Collection Requirements (HMIS)

Grantees must enter client data into the Homeless Management Information System (HMIS) in accordance with the most current [HMIS Data Standards](#).

In order to evaluate the pilot program, grantees are required to enter minimal client data and track service types in HMIS. While the program is integrated with Coordinated Entry, HMIS data will be stored in a separate HMIS project.

5.1 Consent for Entry of Personally Identifying Information

Personally identifying information (PII)⁴ 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 *Client Release of Information and Informed Consent Form*⁵. If electronic consent has been received, a copy does not need to be printed for the client file but must be available in HMIS.

Telephonic consent for HMIS entry is allowable. Telephonic consent may temporarily substitute written consent provided that written consent is obtained at the first time the individual is physically present at the agency. If someone provides telephonic consent and is never seen in person, it is fine to keep that record as consenting in HMIS. There are no documentation requirements, although telephonic consent can be noted in the client file and you can utilize the public alerts under the client notes section in HMIS.

Telephonic consent is not required of people who will have anonymous records. These are clients who are:

- 1) In DV agencies; or
- 2) Currently fleeing or in danger from a domestic violence, dating violence, sexual assault or stalking situation; or
- 3) Being served in a program that requires disclosure of HIV/AIDS status (i.e.; HOPWA); or
- 4) Under 13 with no parent or guardian available to consent to enter the minor's information in HMIS.

5.2 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

⁴ PII includes name, social security number, birthdate, address, phone number, email, and photo.

⁵ The HMIS Informed Consent form can be found in English and Spanish here: <https://www.commerce.wa.gov/serving-communities/homelessness/hmis/>

danger from a 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
- 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.

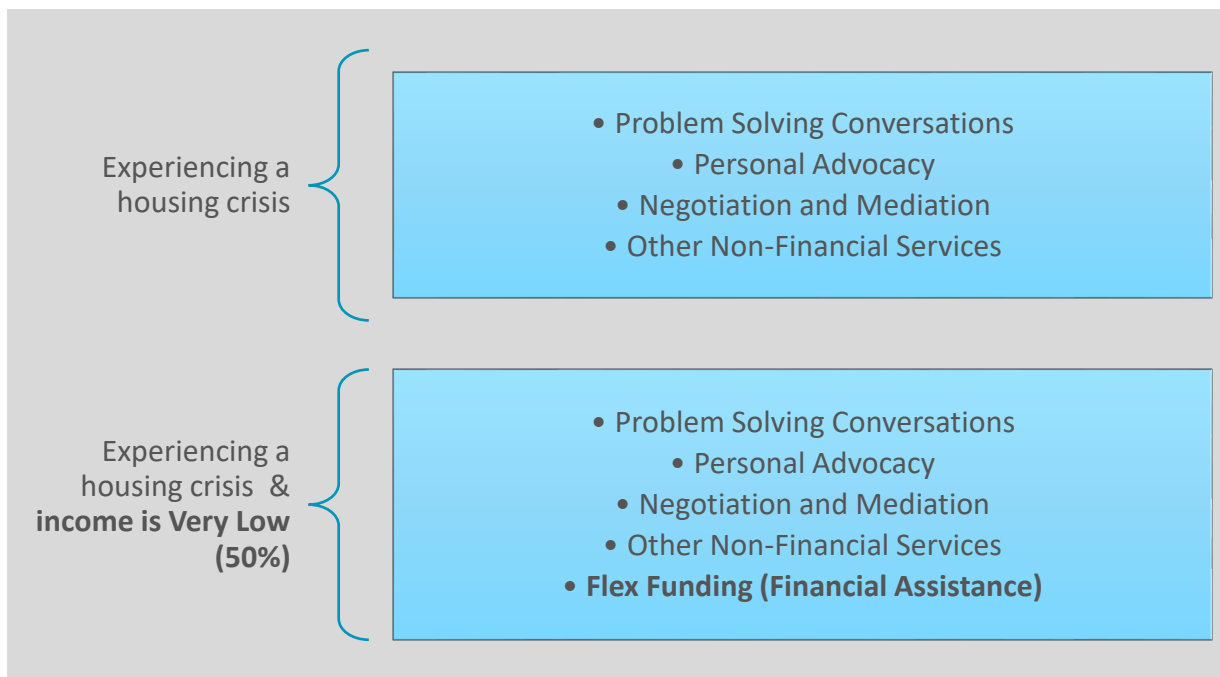
5.3 Data Quality

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.

For detailed data quality requirements see [Appendix A: HMIS Data Quality](#).

6 Program Eligibility

6.1 Program Eligibility Summary



6.2 Housing Status Eligibility Criteria:

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

Eligible households (individuals, families with children⁶, youth and young adults) are 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 that is 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, and hotels and motels paid for by charitable organizations or

⁶ Families with children includes parents who are involved with the child welfare system, for whom stable housing would aid in the family re-unification process.

government programs.

- Exiting a system of care or institution where no subsequent residence has been identified.
- Residing in a trailer or recreational vehicle that is parked illegally or in a location that is 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.

6.3 Income Eligibility Criteria

For households receiving Flex Funding, the combined household net income must not exceed Very Low (50%) Income Limits for the county, which can be found here:

https://www.huduser.gov/portal/datasets/il/il2020/select_Geography.odn

Income is money that is paid to, or on behalf of, any household member. Income includes the current net income of all adult (18 years and older) household members and unearned income attributable to a minor. 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.

Income eligibility criteria DOES NOT APPLY to clients receiving only problem solving conversations and personal advocacy services. Income eligibility criteria only applies to clients receiving Flex Funding.

6.3.1 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 email verification of income
- 3rd party verbal verification of income
- Self-declaration

7 Eligible Activities and Expenses

The primary activity of this program is to provide direct Diversion services (problem-solving conversations, personal advocacy, and Flex Funding). Flex Funding is an allowable expense when needed to ease the transition out of a crisis. Not every household facing a housing crisis will need the Flex Funding component of Diversion.

7.1 Administration

Allowable administrative costs benefit the organization as a whole and cannot be attributed specifically to a particular program. Up to 15 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 that are listed in program operations (such as IT staff and office supplies), in the case that these costs are benefiting 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 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 that are billed by the hour.
- Shared costs that are allocated directly by means of a cost allocation plan.
- Costs related to executive personnel such that a direct relationship between the cost and the benefit cannot be established must be charged indirectly by use of an indirect cost rate which has been appropriately negotiated with an approved cognizant agency or by use of the 10 percent de minimus.

7.2 Program Operations

Program operations expenses are directly attributable to the program and are associated with the provision of Diversion services as part of the CE process:

- Direct personnel costs (salary and benefits) associated with Diversion service delivery, which includes mobile or outreach-based staff.
- Travel expenses associated with mobile or outreach-based Diversion service delivery.
- Supplies related to the program.

- Staff training related to the program.
- Office space, utilities, phone, internet related to the program.
- Equipment up to \$5,000 per grant period unless approved in advance by Commerce.
- Interpretation and translation services to ensure program accessibility.

7.3 Flex Funding

Flex Funding is direct financial assistance provided to clients or on behalf of clients as needed to ease the transition out of crisis.

Households are eligible for Flex Funding up to \$1,500 per household per occasion of housing crisis or homelessness.

If the need exceeds \$1,500 program, staff must document in a brief written statement regarding why the exemption was required. This must be provided to Commerce upon request.

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
Storage	<ul style="list-style-type: none"> • Cost of short-term storage
Transportation	<ul style="list-style-type: none"> • Transportation costs to relocate participants if their primary housing solutions are out of the community • Car repairs, gas vouchers, bus tickets, or other transportation costs related to employment, childcare, or education
Emergent Needs	<ul style="list-style-type: none"> • Essential household needs including food, personal health and hygiene items, and cleaning supplies • Supplies that can be used to secure housing
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.) • Certifications/license fees or materials related to employment
Legal Services and Fees	<ul style="list-style-type: none"> • Legal fees required to access or maintain housing

<p>Interpreter/Translation Services and Fees</p>	<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>
<p>Other</p>	<ul style="list-style-type: none"> • Other costs in agreement with Commerce

7.4 Ineligible Use of Funds

Grantees must inform Commerce if grant funds are spent on ineligible households or expenses. Reasonable attempts must be made to prevent ineligible use of funds.

8 Administrative Requirements

8.1 Grant Management

8.1.1 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.

8.1.2 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.

8.1.3 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 directly contact subgrantees 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 selection of subgrantees.

8.1.4 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.

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

8.2 Fiscal Administration

8.2.1 Budget Caps

Administration - up to 15 percent of total reimbursed costs may be used for administration.

8.2.2 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 reduction in 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 Commerce representative for access to the online invoicing system.

8.2.3 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 more than 10 percent of the grant total.

9 Appendix A: HMIS 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.

9.1 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, race, and ethnicity** from clients that give consent on the [HMIS consent form](#). **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 refused 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 refused or Data not collected; or [Date of Birth] is missing.
Race*	[Race] field contains Client doesn't know, Client refused, Data not collected, or is missing.
Ethnicity*	[Ethnicity] field contains Client doesn't know, Client refused, Data not collected, or is missing.
Prior Living Situation	[Prior Living Situation] is client doesn't know, client refused, data not collected, or is missing.
Destination	[Destination] is Client doesn't know, Client refused, 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	Night-by-Night/Drop-in Emergency Shelter	All other Housing Project Types	Street Outreach
Name*	85%	80%	95%	90%
Date of Birth*	85%	80%	95%	90%
Race*	85%	80%	95%	90%
Ethnicity*	85%	80%	95%	90%

Prior Living Situation	85%	80%	100%	85%
Destination	80%	50%	95%	50%

*Only measured for consenting clients.

9.2 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 enrollment/exit.

9.3 Accuracy

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

Accurate data is necessary to ensure 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.
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.

9.4 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 Data Standards Manual](#). To avoid any 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 [Department of Commerce Guidance](#) and the [consent refused client entry guide](#).