



September 1, 2025

RE: HMIS Comparable Database

Dear VSP,

We are committed to keeping Osnium up to date with the HMIS comparable standards, as part of that we would like to indicate that Osnium Software Inc. will have the FY2026 HMIS Data Standards and CoC APR/ESG CAPER Reports that are required for Victim Service Providers by October 1<sup>st</sup> 2025.

Best regards,

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# Homeless System Response: Comparable Database Vendor Checklist

HUD requires all Continuum of Care (CoC) Program and Emergency Solutions Grants (ESG) Program recipients to collect data on projects and the clients served by those projects in a Homeless Management Information System (HMIS) or comparable database for those agencies that are prohibited from entering data in an HMIS. This checklist provides an example of how agencies required to implement a comparable database can demonstrate due diligence:

1. Complete the checklist below.
2. Identify deficiencies and developing an action plan or quality improvement strategy.
3. Communicate with the comparable database software vendors or negotiate enhanced contractual terms and conditions.

These criteria are not solely used to measure compliance, but rather to ensure that the vendor provides software that meets the minimum privacy standards and data collection/reporting requirements in addition to meeting the needs of the community. This checklist can also be used as a strategic planning resource for how a comparable database can be used as a tool to prevent and end homelessness in the community. Working with your HMIS Lead on the selection of a comparable database can help provide insight on the data management and reporting needs necessary to meet minimum standards.

To understand if you are required to implement a comparable database, review the [Victim Service Provider Comparable Database and Reporting Requirements](#) and the U.S. Department of Housing and Urban Development's (HUD's) guidance on [when to use a comparable database](#).

Requirements		
Criteria	✓	Checklist Notes
The comparable database can protect data according to the different federal and local privacy laws, as needed; these laws are not universally applicable (i.e., HIPAA, 42 CFR Part 2) and, if the Violence Against Women Act (VAWA) is more restrictive, VAWA must be followed. <sup>1</sup>	✓	The database is an on-premise solution and the agency has the ability to control who has access to the database. Osnium Software Inc. does not have access to the database.
The comparable database has sufficient security protocols in place including end-to-end data encryption, automatic time out or lock out, concurrent login prevention, username and password access requirements, at least 128-bit+ encryption, SSL certificate, user log(s), and an automated audit trail.	✓	Data encryption is in the discretion of the agency. There is an Audit Trail stored in the database.
The comparable database vendor—if storing information with third-party or “cloud” servers—ensures that the contract with the storage provider specifies that the service provider owns the information, and ensures sufficient protocols are in place to protect personally identifying information. <sup>2</sup>	✓	NA – On-premise solution
The comparable database contains all of the Project Descriptor Data Elements (PDDE) and response	✓	

<sup>1</sup> 42 CFR Part 2

<sup>2</sup> Frequently Asked Questions (FAQs) on the VAWA Confidentiality Provision (34 U.S.C. § 12291(b)(2))

Requirements		
Criteria	✓	Checklist Notes
categories. <sup>3</sup>		
The comparable database contains all of the Universal Data Elements (UDE) and response categories. <sup>4</sup>	✓	
The comparable database contains all of the common Program Specific Data Elements (PSDE) and response categories. <sup>5</sup>	✓	
The comparable database contains all of the individual federal partner Program Specific Data Elements PSDE and response categories. <sup>6</sup>	✓	
The comparable database contains all of the Metadata Elements (ME). <sup>7</sup>	✓	
The comparable database provides up-to-date HUD-required reports: Annual Performance Report (APR), Consolidated Annual Performance Evaluation Report (CAPER), and Data Quality Framework. <sup>8</sup>	✓	
The comparable database provides up-to-date federal partner reports for partners applicable to the victim service provider (VSP). <sup>9</sup>	✓	
The comparable database software vendor meets HUD and federal partner deadlines for implementing data element, response category, and report specification updates. <sup>10</sup>	✓	
The comparable database can create a valid comma-separated values (CSV) export per the current HUD CSV specifications. <sup>11</sup>	✓	
The comparable database can dynamically manage households as members join and depart from the household. <sup>12</sup>	✓	
The comparable database has sufficient protocols to prevent duplicate client record creation.	✓	
The comparable database can manage record de-duplication via a client record merger feature.	✓	
The comparable database is available for use with limited unplanned downtime for maintenance.	✓	
The comparable database vendor maintains backup, restoration, and recovery procedures; off-site secured data storage; and emergency technical support.	✓	The agency is responsible for maintaining database backups
The comparable database vendor provides a disaster recovery plan.	✓	The Agency is responsible for maintaining a disaster recovery plan
The comparable database has features that allow those with disabilities or with special needs to enter	✓	Contrast theme, no flickering, multiple font size options

<sup>3</sup> HMIS Data Standards Manual: <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> HMIS Guidebooks, Templates, and Resources for CoC Grant-Funded Programs: <https://www.hudexchange.info/programs/hmis/hmis-guides/#coc-resources>

<sup>9</sup> Federal partner Program Manuals: <https://www.hudexchange.info/programs/hmis/federal-partner-participation/>

<sup>10</sup> HUD and federal partners occasionally update HMIS data standards to improve data collection and reporting capabilities across HMIS implementations. Current HMIS data standards are available at: <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

<sup>11</sup> HMIS CSV Export Specifications: <https://hudhdx.info/VendorResources.aspx>

<sup>12</sup> HMIS Data Standards. Data Dictionary 5.9 Household ID <https://www.hudexchange.info/resources/documents/HMIS-Data-Dictionary.pdf>

Requirements		
Criteria	✓	Checklist Notes
and report data (508 Compliance).		
The comparable database provides access to historical data and has the ability to archive client-level data after seven years. <sup>13</sup>	✓	Data will always reside in the database tables unless it is purged completely. Ability to purge data via scripts.
The comparable database allows the administrator(s) to manage user access through a username, password, and role-based access.	✓	
The comparable database has multiple, tiered levels of system access that provides access to only necessary data collection and reporting functionality for comparable database users to complete their responsibilities.	✓	
The comparable database can import and export data to the latest HUD CSV specifications. <sup>14</sup>	✓	Export for use with the YHDP Report is available

The following table contains several features that are not requirements of a comparable database but are useful to VSPs in meeting the needs of their data collection and reporting. The additional features in this checklist provide ways that the VSPs can use the comparable database in their strategic planning efforts.

Other Common Helpful Features	✓	Checklist Notes
The comparable database provides ad hoc reporting capabilities accessible to comparable database administration.	✓	
The comparable database has a documented data dictionary, clear naming conventions, and table structure to support reporting and data import and export.	✓	
The comparable database can allow flexible data sharing by data element across the agency in accordance with the VSP's privacy protocols and the client's wishes.	✓	
The comparable database software vendor offers training or supports the local comparable database administrator to develop and deliver training on data entry, workflow, security and privacy protocols, and reporting.	✓	
The comparable database software vendor is timely when responding to feature enhancements, issues, errors, or system bugs.	✓	
The comparable database software vendor is timely when responding to CoC and comparable database leadership questions, issues, and concerns.	✓	
The comparable database software vendor provides dedicated customer service representation for comparable database administrator(s).	✓	
The comparable database software vendor has an easily distinguishable testing environment that mirrors the production environment.	✓	

<sup>13</sup> Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. Title IV, Subtitle A, S. 402(f)(3)(a)

<sup>14</sup> Ibid.

Other Common Helpful Features	✓	Checklist Notes
The comparable database can provide a resource directory that details the agency and program information as well as program eligibility and real-time vacancies to facilitate the coordinated entry process.		
The comparable database provides the ability to make eligibility-informed referrals and track referral outcomes.		
The comparable database can upload documents to client files.	✓	
The comparable database provides a customizable prioritization function that can be accessed by comparable database users for coordinated entry process purposes.		
The comparable database can collect assessment data for the coordinated entry process.	✓	Static coordinated assessment available. Missing locally determined assessment questions.
The comparable database has a bed and unit management feature to allow for expedient entry and exit into specific beds and units that show real-time vacancy.	✓	
The comparable database can print assessments, reports, and documents.	✓	
The comparable database provides report capabilities that have drill-down functionality to assure the data contained within reports is valid.	✓	
The comparable database has a logical workflow that eliminates redundant data entry and prevents wasted effort of data entry across multiple screens or modules.	✓	
The comparable database displays system alerts that detail system-level information, agency-specific information, and comparable database user-level action items.	✓	
The comparable database provides a tool for case management including case notes, goal plans, and housing plans.	✓	
The comparable database has the ability to manage and report Point-in-Time (PIT) Count data.		
The comparable database can collect electronic signatures.		
The comparable database allows for real-time data analysis.	✓	
The comparable database provides agency- and project-level reporting capabilities for use by comparable database users beyond HUD- and federal partner-required reports (client-served reports, dashboards).	✓	
The comparable database provides the ability to manage data by various and multiple funding sources.	✓	
The comparable database has coordinated entry process reports available (including reports for prioritization, referral, and active list management purposes).	✓	Osnium provides the HUD CE APR Report

The comparable database provides data element and response category definitions within the workflow for comparable database users.		
The comparable database allows for comparable database users to reset their passwords without comparable database administrator assistance.	✓	

