

4.2 Comparable Database (CDB)

PURPOSE

This policy outlines the privacy and confidentiality standards required for agencies working with individuals fleeing domestic violence, particularly those receiving Violence Against Women Act (VAWA) funding or participating in the Coordinated Entry System (CES). The policy ensures that the sensitive information of domestic violence survivors is protected in accordance with federal guidelines utilizing the Comparable Database (CDB).

FORMS

There are no forms related or required for this Policy

POLICY

The Domestic Violence population comes with its own set of privacy and confidentiality standards. Recipients of Violence Against Women Act (VAWA) funding and all agencies that participate in CES are prohibited from disclosing personally identifiable information without the participant's written consent.

Client's fleeing domestic violence can have their information entered into a VAWA-compliant comparable database but will not be entered into the HMIS. Comparable Databases collect aggregate data with no identifying information being stored or reported, which makes client information entered unidentifiable to others.

VSPs are prohibited from entering data into HMIS and will be required to use a CDB to participate in CES. A CDB is a relational database that meets all HMIS Data Standards and does so in a method that protects the safety and privacy of survivors.

CES will rely on VSP to utilize the CDB to safely integrate homeless victims access housing available through the CoC CES.

KEY TAKE AWAYS

- **Confidentiality and Consent:** Agencies that receive VAWA funding and all other agencies involved in CES are strictly prohibited from disclosing personally identifiable information (PII) of domestic violence survivors without the participant's explicit, written

consent. This is to ensure the safety and privacy of individuals who are fleeing domestic violence.

- **Use of Comparable Databases:** Survivors of domestic violence may have their information entered into a VAWA-compliant comparable database instead of the HMIS. These databases collect and store aggregate data without any identifying details, making the information untraceable to ensure the privacy of the clients.
- **Victim Service Providers (VSPs):** VSPs are prohibited from entering any client data into the HMIS. Instead, they must use a comparable database that meets all HMIS Data Standards while ensuring the safety and privacy of the survivors. This alternative database allows VSPs to participate in CES without compromising client confidentiality.
- **Coordinated Entry System (CES) Integration:** The CES will depend on VSPs to use the CDB to safely facilitate access to housing for homeless victims through the CoC CES. This approach ensures that survivors can access the services they need without exposing their personal information to potential risks.

This policy is designed to protect the privacy and safety of domestic violence survivors while ensuring their access to necessary housing and support services within the CES.