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PURPOSE

This document provides the policies, procedures, guidelines, and standards that govern the North Central Florida Alliance for the Homeless and Hungry (FL-508 or NCFA). HMIS partnering agencies for contributing data to the HMIS. The HMIS Staff will provide each HMIS Member Agency provider with a copy of this document. As a condition of participation, each HMIS Member Agency is asked to adhere to all policies within the document as signed in the HMIS Memorandum of Understanding (MOU).

EXCEPTIONS

In order to mitigate risk from participation in the HMIS system, the leadership of the CoC has the right to grant exemptions to any HMIS policy only in the following instances:

1. Unique circumstances/projects not encountered before by HMIS staff,
 2. Public policy decisions needing some considerations,
 3. In need of quick timelines for implementation.
- No other instances will be considered.

ACKNOWLEDGMENTS

The HMIS staff of NCFA would like to thank its many statewide and national colleagues who have shared their policies with us, while in the development of this document. We would also like to thank the HMIS Member Agencies and local community planners for their thoughts, ideas, and work to help draft and revise this document.

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UNIVERSAL DATA ELEMENTS (UDEs)

- **Name**
- **Name Data Quality**
- **Social Security Number**
- **Social Security Number Data Quality**
- **Date of Birth**
- **Date of Birth Data Quality**
- **Race**
- **Ethnicity**
- **Gender**
- **Veteran Status**
- **Disabling Condition**
- **Project Start Date**
- **Project Exit Date**
- **Destination**
- **Relationship to Head of Household**
- **Client Location**
- **Housing Move-in Date**
- **Prior Living Situation**

U. S. Department of Housing & Urban Development (HUD) & HMIS Acronyms & Definitions

Administration for Children and Families	ACF	A division of the U.S. Department of Health and Human Services (HHS). ACF has a budget for 65 programs that target children, youth and families, including for assistance with welfare, child support enforcement, adoption assistance, foster care, childcare, and child abuse.
Agency Administrator	AA	A person designated by an HMIS Member Agency Executive Director/Chief Executive Officer who acts as a liaison and contact person to the HMIS staff.
Alliance of Information & Referral Systems	AIRS	The professional association for more than 1,000 community information and referral (I&R) providers serving primarily the United States and Canada. AIRS maintain the taxonomy of human services.
Annual Performance Report	APR	Report that tracks program progress and accomplishments in HUD's competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee's performance.
Audit Trail		A record showing who has accessed a computer system and what operations he or she has performed during a given period of time. Most database management systems include an audit trail component.
Bed Utilization		An indicator of whether shelter beds are occupied on a particular night or over a period of time.
Biometrics		This refers to the identification of a person by computerized images of a physical feature, usually a person's fingerprint.
Chronic Homelessness		HUD defines a "chronically homeless" individual as a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the chronically homeless definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.
Client		A living individual about whom a CHO collects or maintains protected personal information because (1) the individual is receiving, has received, may receive, or has inquired about assistance from a CHO; or (2) in order to identify needs, or to plan or develop appropriate assistance within the CoC.

Client Intake		The process of collecting client information upon entrance into a program.
Community Development Block Grant	CDBG	A flexible program that provides communities with resources to address a wide range of unique community development needs. Beginning in 1974, the CDBG program is one of the longest continuously run programs at HUD. The CDBG program provides annual grants on a formula basis to 1,180 general units of Local and State governments.
Consumer		An individual or family who has or is currently is experiencing homelessness.
Continuum of Care	CoC	Also called CoC or Continuum, means the group organized to carry out the responsibilities required under the CoC Program Interim Rule(24 CFRPart578) and is comprised of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, and law enforcement, and organizations that serve homeless and formerly homeless persons to the extent that these groups are represented within the geographic area and are available to participate.
Continuum Program		Also called "Program" refers to the federal funding source which provides housing and/or service grant dollars.
Coordinated Entry	CE	Coordinated Entry and Homeless Management Information Systems (HMIS) Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred and connected to housing and assistance based on their strengths and needs.
Coverage		A term commonly used by CoCs or homeless providers to refer to the number of beds represented in an HMIS divided by the total number of beds available.
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses, or processes data on homeless clients for and, the requirements of the HMIS Final Notice apply to all Covered Homeless Organizations.
Data Quality		The accuracy and completeness of all information collected and reported to the HMIS. Data Standards.
Date of Birth	DOB	The date a person was born.
De-identification		The process of removing or altering data in a client record that could be used to identify the person. This technique allows research, training, or other non-clinical applications to use real data without violating client privacy.

Department of Education	DOE	The agency of the federal government that establishes policy for administrators and coordinates most federal assistance to education. It assists the president in executing his education policies for the nation and in implementing laws enacted by Congress. The agency of the federal government that establishes policy for administrators and coordinates most federal assistance to education. It assists the president in executing his education policies for the nation and in implementing laws enacted by Congress.
Digital Certificates		An attachment to an electronic message used for security purposes. The most common use of a digital certificate is to verify that the user sending a message he or she claims to be and to provide the receiver with the means to encode a reply, she claims to be and to provide the receiver with the means to encode a reply.

Disabling Condition		A disabling condition in reference to chronic homelessness is defined by HUD as a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.
Domestic Violence	DV	Occurs when a family member, partner or ex-partner attempt to physically or psychologically dominate another. Includes physical violence, sexual abuse, emotional abuse, intimidation, economic deprivation, and threats of violence. Violence can be criminal and includes physical assault (hitting, pushing, shoving, etc.), sexual abuse (unwanted or forced sexual activity), and stalking. Although emotional, psychological and financial abuses are not criminal behaviors, they are forms of abuse and can lead to criminal violence. There are a number of dimensions of DV. Mode physical, psychological, sexual and/or social; frequency on/off, occasional, chronic; and severity in terms of both psychological or physical harm and the need for treatment, including transitory or permanent injury, mild, moderate, and severe up to homicide.
Electronic Housing Inventory Chart	eHIC	Point-in-time inventory of provider programs within a Continuum of Care that provides beds and units dedicated to serve persons who are homeless, categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing.
Electronic Special Needs Assistance Program	e*SNAPs	Established by HUD to address the specific needs of persons living with HIV/AIDS and their families. HOPWA makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons medically diagnosed with HIV/AIDS
Emergency Food and Shelter Program	EFSP	A federal program administered by the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) and has been entrusted through the McKinney-Vento Homeless Assistance to supplement and expand ongoing efforts to provide shelter, food, and supportive services for hungry and homeless people across the nation.
Emergency Shelter	ES	Any facility whose primary purpose is to provide temporary shelter for the homeless in general or for specific populations of the homeless.
Emergency Solutions Grants	ESG	A federal grant program designed to help improve the quality of existing emergency shelters for the homeless, to make available additional shelters, to meet the costs of operating shelters, to provide essential social services to homeless individuals, and to help prevent homelessness.
End-User	EU	Any individual who uses or enters data in an HMIS or a comparable database approved by the CoC. This can include Agency Administrators.
Encryption		Conversion of plain text into unreadable data by scrambling it using a code that masks the meaning of the data to any unauthorized viewer. Computers encrypt data by using algorithms or formulas. Encrypted data are not readable unless they are converted back into plain text via decryption.
Ethnicity		Identity with or membership in a particular racial, national, or cultural group and observance of that group's customs, beliefs, and language.
Family and Youth Services Bureau	FYSB	Provides national leadership on youth and family issues. Promotes positive outcomes for children, youth, and families by supporting a wide range of comprehensive services and collaborations at the local, Tribal, State, and national levels.
Federal Emergency Management Agency	FEMA	The agency responsible for coordinated response for disaster that has occurred in the United States and that overwhelms the resources of local and state authorities.
Federal Information Processing Standards	FIPS	Ensure that all federal government and agencies adhere to the same guidelines regarding security and communication.
Geographic Information Systems	GIS	An information system for capturing, storing, analyzing, managing, sharing, and displaying geographically referenced information.
Government Performance and Results Act	GPRA	One of a series of laws designed to improve government project management. The GPRA requires agencies to engage in project management tasks such as setting goals, measuring results, and reporting their progress. In order to comply with GPRA, agencies produce strategic plans, performance plans, and conduct gap analysis of projects.
Hashing		The process of producing hashed values for accessing data or for security. A hashed value is a number or series of numbers generated from input data. The hash is generated by a formula in such a way that it is extremely unlikely that some other text will produce the same hash value or that data can be converted back to the original text. Hashing is often used to check whether two texts are identical. For the purposes of Homeless Management Information Systems, it can be used to compare whether client records contain the same information without identifying the clients.
Health Insurance Portability and Accountability Act of 1996	HIPAA	U.S. law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals, and other health care providers. Developed by the Department of Health and Human Services, these standards provide patients access to their medical records and give them more control over how their personal health information is used and disclosed.
HMIS Data and Technical Standards Final Notice		Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS. The HMIS Final Notice contains rules about who needs to participate in HMIS, what data to collect, and how to protect client information.
HMIS Lead Organization	HMIS Lead	The central organizations that will house those individuals who will be directly involved in implementing and providing operational, training, technical assistance, and technical support to participating agencies.

HMIS System Administrator	Admin	The individual(s) whose job it is to manage the HMIS implementation at the local level: enrolling programs and managing appropriate use supporting users through connection to or direct provision of user training, and overseeing system setup.
Homeless Management Information System	HMIS	Computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness.
Homelessness Prevention and Rapid ReHousing Program	HPRP	The Homelessness Prevention and Rapid Re-Housing Program will provide financial assistance and services to prevent individuals and families from becoming homeless and help those who are experiencing homelessness to be quickly re-housed and stabilized.
Housing Opportunities for Persons with AIDS	HOPWA	Established by HUD to address the specific needs of persons living with HIV/AIDS and their families. HOPWA makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons medically diagnosed with HIV/AIDS and their families.
HOPWA Consolidated Annual Performance and Evaluation Report	(CAPER)	The CAPER report for HOPWA formula grantees provides annual information on program accomplishments that supports program evaluation and the ability to measure program beneficiary outcomes as related to maintain housing stability; prevent homelessness, and improve access to care and support.
Inferred Consent		Once clients receive an oral explanation of HMIS, consent is assumed for data entry into HMIS. The client must be a person of age and in possession of all his/her faculties (for example, not mentally ill).
Information and Referral	I&R	A process for obtaining information about programs and services available and linking individuals to these services. These services can include emergency food pantries, rental assistance, public health clinics, childcare resources, support groups, legal aid, and a variety of nonprofit and governmental agencies. An HMIS usually includes features to facilitate information and referral.
Informed Consent		A client is informed of options of participating in an HMIS system and then specifically asked to consent. The individual needs to be of age and in possession of all of his faculties (for example, not mentally ill), and his/her judgment not impaired at the time of consenting (by sleep, illness, intoxication, alcohol, drugs or other health problems, -etc.).
McKinney-Vento Act		The McKinney-Vento Homeless Assistance Act was signed into law by President Ronald Reagan on July 22, 1987. The McKinney Vento Act funds numerous programs providing a range of services to homeless people, including the Continuum of Care programs: the Supportive Housing Program, the Shelter Plus Care Program, and the Single Room Occupancy Program, as well as the Emergency Shelter Grant Program.
Memorandum of Understanding	MOU	A bilateral or multilateral agreement between two or more parties.
Member Agency		An agency that has signed all HMIS agreements and who is actively entering data into the system.

Mental Health	MH	State of emotional and psychological well-being in which an individual is able to use his or her cognitive and emotional capabilities, function in society, and meet the ordinary demands of everyday life.
Notice of Funding Availability	NOFA	An announcement of funding available for a particular program or activity. See also Super NOFA.
Penetration Testing		The process of probing a computer system with the goal of identifying security vulnerabilities in a network and the extent to which outside parties might exploit them.
Performance Assessment Rating Tool	PART	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. The PART, therefore, looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Be-cause the PART includes a consistent series of analytical questions, it allows programs to show improvements over time and allows comparisons between similar programs.
Performance Measures		A process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.
Permanent Supportive Housing		Long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables the special needs populations to live independently as possible in a permanent setting.
Personal Protected Information	PPI	Information that can be used to uniquely identify, contact or locate a single person, or may enable disclosure of personal information.
Point in Time	PIT	A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.
Performance Assessment Rating Tool	PART	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. The PART, therefore, looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Be-cause the PART includes a consistent series of analytical questions, it allows programs to show improvements over time and allows comparisons between similar programs.

Performance Measures		A process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.
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Privacy Notice		A written, public statement of an agency's privacy practices. A no-notice informs clients of how personal information is used and disclosed. According to the HMIS Data and Technical Standards, all covered homeless organizations must have a privacy notice.
Program Data Element	PDE	Data elements required for programs that receive funding under the McKinney-Vento Homeless Assistance Act and complete the Annual Progress Reports (APRs).
Prospective Member Agency		An agency who has inquired about joining HMIS.
Privacy Notice		A written, public statement of an agency's privacy practices. A no-notice informs clients of how personal information is used and disclosed. According to the HMIS Data and Technical Standards, all covered homeless organizations must have a privacy notice.
Program Data Element	PDE	Data elements required for programs that receive funding under the McKinney-Vento Homeless Assistance Act and complete the Annual Progress Reports (APRs).
Prospective Member Agency		An agency who has inquired about joining HMIS.
Race		Identification within five racial categories: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White
Release of Information	ROI	In the United States, HIPAA and State guidelines strongly direct the rules and regulations of patient information. ROI departments perform such tasks as obtaining patient consent, certifying medical records, and deciding what information can be released.
Runaway and Homeless Youth Management Information System	RHYMIS	An automated information tool designed to capture data on the run-away and homeless youth being served by FYSB's Basic Center Program and Transitional Living Program for Older Homeless Youth (TLP). RHYMIS also captures information on the contacts made by the Street Outreach Program grantees and the brief service contacts made with youth or families calling the FYSB programs.
SAGE HMIS Reporting Repository	SAGE	Effective April 1, 2017, all APRs will be submitted in Sage HMIS Reporting Repository. It Replace e-Snaps that will remain open for recipients to revise or update APRs that they submitted in the system by March 30, 2017. The "Archived e-snaps Resources for submitting APRs in Sage are available on the HUD Website

Scan Cards		Some communities use ID cards with bar codes to reduce intake time by Electronically scanning ID cards to register clients in a bed for a night. These ID cards are commonly referred to as scan cards.
Shelter Plus Care (McKinney-Vento Program)	S+C	A program that provides grants for rental assistance for homeless persons with disabilities through four component programs: Tenant, Sponsor, Project, and Single Room Occupancy (SRO) Rental Assistance.
Single Room Occupancy	SRO	A residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both. It provides rental assistance on behalf of homeless individuals in connection with moderate rehabilitation of SRO dwellings.
Social Security Number	SSN	A 9-digit number issued by the Social Security Administration to individuals who are citizens, permanent residents, and temporary (working) residents.
Super Notice of Funding Availability	SNAP	The consolidation of all of HUD's homeless grants program into one notice of funding availability. The Super NOFA funds the Continuum of Care Competition.
Supplemental Security Income	SSI	A monthly stipend provided to aged (legally deemed to be 65 or older), blind, or disabled persons based on need, paid by the U.S. Government
Supportive Housing Program	SHP	A program that provides housing, including housing units and group quarters that has a supportive environment and includes a planned service component.
Supportive Services		Services that may assist homeless participants in the transition from the streets or shelters into permanent or permanent supportive housing, and that assist persons with living successfully in housing.
Supportive Services Only	SSO	Projects that address the service needs of homeless persons. Projects are classified as this component only if the project sponsor is not also providing housing to the same persons receiving the services. SSO projects may be in a structure or operated independently of a structure, such as street outreach or mobile vans for health care
Technical Assistance	TA	Specialized service or skill that a nonprofit does not possess within the organization, but which it may need in order to operate more effectively. Examples of technical assistance include Grant writing and other forms for Fundraising, Strategic Planning.

Technical Submission		The form completed in the second phase of the SHP fund application process where an applicant that is successful in the competition (called a "conditionally selected grantee" or "selectee") then provides more detailed technical information about the project that is not contained in the original application.
Temporary Assistance for Needy Families	TANF	Provides cash assistance to indigent American families with dependent children through the United States Department of Health and Human Services.
Transitional Housing	TH	A project that has its purpose in facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months).
Unaccompanied Youth		Minors not in the physical custody of a parent or guardian, including those living in inadequate housing such as shelters, cars, or on the streets. It also includes those who have been denied housing by their families and school-Age unwed mothers who have no housing of their own.
Unduplicated Count		The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.
Unduplicated Count		The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.
Universal Data Element	UDE	Data required to be collected from all clients serviced by homeless assistance programs using an HMIS. These data elements include date of birth, gender, race, ethnicity, veteran's status, and Social Security Number (SSN). These elements are needed for CoCs to understand the basic dynamics of homelessness in their community and for HUD to meet the Congressional directive. A complete listing of all UDEs is included as the first page of the document.
U.S. Department of Health and Human Services	HHS	A Cabinet department of the United States government with the goal of protecting the health of all Americans and providing essential human services.
U.S. Department of Housing and Urban Development	HUD	The Federal agency responsible for national policy and programs that address America's housing needs that improve and develop the Nation's communities, and enforce fair housing laws. HUD's business is helping create a decent home and suitable living environment for all Americans, and it has given America's cities a strong national voice at the Cabinet-level.
Veterans Affairs	VA	The government runs a military veteran benefit system. It is responsible for administering programs of veterans' benefits for veterans, their families, and survivors. The benefits provided include disability compensation, pension, education, home loans, life insurance, vocational rehabilitation, survivors' benefits, medical benefits, and burial benefits.
Violence Against Women Act	VAWA	Programs range from policies to encourage the prosecution of abusers to victim's services to prevention programs. VAWA helped forge new alliances between police officers, courts, and victim advocates.
Written Consent		Written consent embodies the element of informed consent in a written form. A client completes and signs a document consenting to an understanding of the options and risks of participating or sharing data in an HMIS system. The signed document is then kept on file at the agency.

U.S. Department of Housing & Urban Development (HUD) & HMIS Reports

Longitudinal systems analysis report	LSA	A critical aspect of the McKinney-Vento homeless assistance act, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community.
Audit Trail		A record showing who has accessed a computer system and what operations he or she has performed during a given period of time. Most database management systems include an audit trail component.
Indian Housing Block Grants	IHBG	The Annual Performance Report (APR) is a self-assessment prepared by the recipient of an Indian Housing Block Grants (IHBG). The APR is required by Section 404 of the Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA); regulations for the program are published at 24 CFR Part 1000.
HMIS Data and Technical Standards Final Notice		Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS. The HMIS Final Notice contains rules about who needs to participate in HMIS, what data to collect, and how to protect client information.
Homelessness PULSE	PULSE	Generated on a quarterly basis, this report, similar to the LSA, provides real-time information on service usage and trends to the Department of Housing and Urban Development.
Housing Inventory Chart	HIC	Consists of three housing inventory charts for emergency shelter, transitional housing, and permanent supportive housing.
Performance Assessment Rating Tool	PART	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. The PART, therefore, looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Because the PART includes a consistent series of analytical questions, it allows programs to show improvements over time and allows comparisons between similar programs.
Performance Measures		A process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.
Point in Time	PIT	A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.
Technical Submission		The form completed in the second phase of the SHP fund application process where an applicant that is successful in the competition (called a "conditionally" selected grantee" or "selectee") then provides more detailed technical information about the project that is not contained in the original application.

U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD) & PARTNERS PROJECTS & ACRONYMS

PROGRAMS	ACRONYM	PROJECTS	ACRONYM
HUD-Continuum of Care Program	CoC		
		Electronic Social Needs Assistance Program	e*SNAPs
		Homeless Prevention	HP
		Permanent Supportive Housing	PSH
		Rapid Re-Housing	RRH
		Support Services Only	SSO
		Transitional Housing	TH
		Safe Haven	SH
		20-year Use Requirement	SRO
HUD-Emergency Solutions Grants Program	ESG		
		Emergency Shelter	ES
		Intake/Exit	ES-e/e
		Night-by-Night	ES-NBN
HUD-Rural Housing Stability Assistance Program	RHSA		
HUD-Housing Opportunities for Persons with AIDS	HOPWA		
		Hotel/Motel	HM
		Housing Information	HI
		Permanent Housing	PH
		Permanent Housing Placement	PHP
		Short Term Housing	STH
		Transitional Housing	TH
		Rural Housing Stability Assistance Program	RHSAP
U.S. Department of Health & Human Services	HHS		
HUD-Emergency Solutions Grants Program	ESG		
		Emergency Shelter	ES
PROGRAMS	ACRONYM	PROJECTS	ACRONYM
Administration for Children & Families	ACYF	Runaway Homeless Youth	RHY
Family & Youth Services Bureau	FYSB	Basic Center Program	BCP
		Emergency Shelter	BCP-es
		Preventative	BCP-o
		Maternal Group	MCH
		Transitional Living Program	TLP
		Demonstration Programs	D

Substance Abuse and Mental Health Services Administration	SAMHSA		
Projects for Assistance in Transition from Homelessness	PATH		
		Street Outreach	SO
		Support Services Outreach	SSO
U.S. Department of Veterans Affairs			
HUD/WASH	HV		PSH
		HUD-Veterans Affairs Supportive Housing	VASH
		VA-Grant and Per Diem	GPD
		VA-Supportive Services for Veteran Families	SSVF
		Community Contract Emergency Housing	HCH/EH
		Health Care for Homeless Veterans	HCHV
		Community Residential Treatment Program	HCH/RT
		Detention Care	HCH/DCM
		VA Community Contract Safe Haven Program	HCH/SH
		Grant and Per Diem Program	GPD
		Cooperated Work Therapy Transitional Residence	CWT/TR
		Homelessness Prevention	HP
		Rapid Re-Housing	RRH

INTRODUCTION

The concept of HMIS was created by of the United States Congress and the Department of Housing and Urban Development (HUD). In 1999, Congress mandated the Department of Housing and Urban Development (HUD) find a way to adequately track the scope of homelessness in the United States in the HUD Appropriations Act. The following year, the Department of Housing and Urban Development (HUD) mandated that each community implement or be in the process of implementation of a Homeless Management Information System (HMIS) by October 2004. HMIS is a secure web-based centralized database where non-profit organizations across our community enter, manage, share, and report information about the clients that they serve. It is like an electronic health record system in a hospital. The HMIS staff provides training and technical assistance to HMIS Member Agency providers and their users. Senate and House Appropriations Committee reports have reiterated Congress' directive to HUD to:

- Assist communities in implementing local Homeless Management Information Systems (HMIS), and
- Develop a Longitudinal System Analysis (LSA) that is based on HMIS data from a representative sample of communities.

Congress renewed its support for the HMIS initiative and the LSA in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115). In addition to Congressional direction HUD, other federal agencies and the U.S. Inter-agency Council on Homelessness requires HMIS under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual projects authorized under the McKinney-Vento Act and the HEARTH ACT require the assessment of homeless needs, the provision of services to address those needs and reporting on the outcomes of federal assistance in helping homeless people to become more independent. The major congressional imperatives in HUD's McKinney-Vento Act and the HEARTH ACT projects are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of these services in enabling homeless persons to become more self-sufficient;
- Reporting to Congress on the characteristics of homeless persons and effectiveness of federal efforts to address homelessness

SECTION 1: HISTORICAL PERSPECTIVE

HMIS PROJECT GOALS:

The first goal is to inform public policymakers about the extent and nature of the homeless population in our community. This is accomplished through analysis of homeless client and service provider data. HMIS gathers an unduplicated count of those accessing services, service trends, bed utilization rates, re-entry rates, and HMIS system usage. All data is provided in an aggregated format and made available to public policymakers, service providers, advocates, and consumer representatives.

The second goal is to streamline the intake and referral process for human service agencies in the community. HMIS provides a standardized mechanism for collecting client information across all providers. Human service providers collect the same client information and then the client can share that information at each project with additional service providers for greater ease of service. As part of the system, a service provider can send an electronic referral to another agency. This streamlined process (Coordinated Entry) allows for the development of centralized coordinated assessment centers where agencies can store assessments, refer clients to other projects, and follow clients longitudinally with a shared information system. Provision of in-depth case management by sharing client information is the goal.

The third goal is to allow for in-depth case management through the sharing of client information in a centralized system. HMIS provides a standardized mechanism in which human service provider collects information and then shares it among every participating human service agency to assist clients more efficiently and effectively.

Finally, the fourth goal is to inventory homeless housing options in the community. HMIS captures this inventory and allows for real-time collection and tracking of emergency shelter, transitional housing, and permanent housing through rapid rehousing & permanent supportive housing.

SECTION 2: HMIS ROLES & RESPONSIBILITIES

ROLES & RESPONSIBILITIES:

- HMIS staff are responsible for coordinating the following items on behalf of HMIS Member Agencies:
 - All software related issues to the software vendor
 - This includes all communication with the vendor including phone, email, and conferences. As well as submitting feature enhancement requests from HMIS Member Agencies.
- User training - HMIS staff is responsible for all end-user training. This is to ensure continuity and consistency with training as well as to ensure the proper workflow for HMIS Member Agencies.
- Technical support as it relates to the software or project - HMIS staff are responsible for providing technical support to agency administrators and end-users. Technical support services attempt to help the user solve specific problems with a product and do not include in-depth training, customization, reporting, or other support services.
- Data quality initiatives – Together, Member Agencies and HMIS staff work diligently on adhering to data quality standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely.
- System-wide reporting on performance measures for local, state and national initiatives - HMIS staff train HMIS Member Agencies on how to access and run reports on the data they contribute to the HMIS. Additionally, reports are provided to governance board members and to statewide and national partners quarterly and annually. These data are in an aggregate format and detail the trends on how clients are being served in the community.
- HMIS Staff coordinates and/or participates in numerous projects annually that include, but are not limited to data collection and reporting.

ANNUAL PROJECTS & REPORTS

The Longitudinal Systems Analysis (LSA) Report

A critical aspect of the McKinney-Vento Homeless Assistance Act, as amended, is a focused on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. The Longitudinal Systems Analysis (LSA) report, produced from a CoC's Homelessness Management Information System (HMIS) and submitted annually to HUD via the HDX 2.0, provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use their system of care. This page provides guidance for CoCs about how to use and interpret their LSAs as well as for HMIS software providers about how to program the report.

Grant Inventory Worksheet (GIW)

Provides CoCs and Field Offices with information about CoC program grants that are eligible for renewal in the upcoming competition.

Housing Inventory Chart (HIC)

The Housing Inventory Chart (HIC) is an annual report submitted to the Department of Housing & Urban Development (HUD) that lists all homeless emergency, transitional, safe haven, shelter plus care, and permanent supportive housing beds in our Continuum of Care (CoC).

Point in Time (PIT)

A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.

SAGE

HUD's new reporting system for the submission of its Continuum of Care (CoC) Program Annual Performance Report (APR). Effective April 1st, 2017, the new system, Sage Homeless Management Information System (HMIS) Repository, will now be the portal for all CoC Program recipients to submit their APR to HUD Annual Performance Report (APR) - The Annual Performance Report (APR) provides annual performance reporting on clients outputs and outcomes that enables an assessment of grantee performance in achieving the housing stability outcome measure. The APR fulfills statutory reporting requirements and provides the grantee and HUD with the necessary information to assess the overall performance and accomplishment of the grantee's program activities under the approved goals and objectives.

SECTION 3: HMIS MEMBER AGENCY ROLES & RESPONSIBILITIES

“HMIS Member Agency” is the term given by the HMIS staff to reference participating healthcare and/or human service providers who actively enter data into the HMIS.

PARTICIPATION REQUIREMENTS POLICY: A qualified HMIS Member Agency is required to sign and abide by the terms of the HMIS Member Agency Agreement and the HMIS Policies and Procedures.

PROCEDURE: Any organization that provides health and human service may qualify to participate in HMIS. To participate in HMIS, Member Agencies must sign and agree to abide by the terms of the HMIS Member Agency Agreement. They must also abide by the policies and procedures outlined in this document as well as the End-user Agreement. All Member Agencies that receive funding from the United States Housing and Urban Development Department (HUD) or DCF are mandated to participate in HMIS by contract. For other agencies, participation is voluntary and strongly encouraged by the local CoC.

HMIS MEMBER AGENCY AGREEMENT POLICY : The HMIS Member Agency Agreement must be signed by an authorized representative of each HMIS Member Agency.

DOCUMENT: The HMIS Member Agency Agreement is a legal contract between the HMIS Member Agency and the HMIS Lead Agency regarding specific HMIS guidelines and use. The agreement outlines specific details about the HMIS Member Agency providers’ HMIS involvement including, but not limited to, the areas of confidentiality, data entry, security, data quality, and reporting.

PROCEDURE FOR EXECUTION: The Agency’s Executive Director (or authorized officer) will sign two copies of the HMIS Member Agency Agreement and mail them to the HMIS Lead Agency. Upon receipt of the signed agreement, it will be signed by the HMIS Lead Agency director. One copy of the HMIS Member Agency Agreement will be scanned and filed, both as a hard copy and electronically with the HMIS Lead Agency. The original copy will be mailed back to the HMIS Member Agency.

AGENCY STAFF ROLES AND REQUIREMENTS POLICY: For a Member Agency with more than five employees and licensed end-users, the Member Agency will assign both an Agency Administrator and a back-up Agency Administrator to coordinate HMIS activities for their organization. Procedure: The Executive Director (or authorized officer) of the Agency will complete the Agency Administrator Designation Form to assign the position to a specific staff person. This role is vital to the success of HMIS at the HMIS Member Agency locations. This practice will ensure that the data is entered in a timely manner, the quality of the data is continuously monitored, and communication and support between HMIS and the HMIS Member Agency is streamlined. An Agency Administrator is the staff member at an HMIS Member Agency provider who acts as the centralized contact for the HMIS staff.

AGENCY ADMINISTRATOR ROLE AND RESPONSIBILITY

The Agency Administrator role is to act as the operating manager and liaison for the HMIS system at the HMIS Member Agency.

- This position is required for any Member Agency with five or more active licenses.
- They are responsible for the following items:

- Adhere to and enforce the HMIS Policies and Procedures.
- Attend at least one Agency Administrator Training.
- Maintain current user license in the system by completing the certification assignments within 5 days of training and login to the system at least once every 30 days.
- Communicate and authorize personnel and security changes for HMIS end-users to HMIS Staff within 24 hours of a change. Act as the first tier of support for HMIS end-users.
- Ensure client privacy, security, and confidentiality for clients.
- Enforce HMIS end-user agreements.
- Ensure the HMIS Privacy Notice is posted in a visible area of the Agency and communicated in a language understandable by clients.
- Enforce data collection, entry, and quality standards.
- Ensure a basic competency with running HMIS system reports and have an understanding of system-wide data quality reports.
- Ensure Agency and all users are using the correct HMIS related forms and following the most current HMIS procedures and workflow.
- Attend all HMIS required meetings and conference calls.
- Assist with HMIS projects as needed (LSA, PIT, HIC, CAPER) Schedule/Authorize HMIS end-user training.
- Inform HMIS Staff of all project changes within at least five business days prior to the change.

POLICY For Member Agencies with less than five employees and licensed end-users, an Agency Administrator is not required, but at least one HMIS Point of Contact is required to communicate with the HMIS staff.

PROCEDURES: The Point of Contact role is very similar to the Agency Administrator role but without the technical support aspect.

- The HMIS staff will fulfill the role of help desk support and triage.
- A Member Agency should designate a primary and a back-up Point of Contact. The HMIS Point of Contact is responsible for the following items:
 - Adhere to and enforce the HMIS Policies and Procedures.
 - Enforce HMIS User Agreements. Ensure client privacy, security, and confidentiality.
 - Communicate and authorize personnel/security changes for HMIS End-users to HMIS Staff within 24 hours of a change.
 - Authorize HMIS End-users by completing the HMIS End-user Request Form prior to training. Ensure Agency and all users are using the correct HMIS related forms and following the most current HMIS workflow.
- Inform HMIS Staff of all project changes with at least five business days prior to the change.
- Ensure the HMIS Privacy Notice is posted in a visible area of the Agency and communicated in a language understandable by clients.
- Attend all HMIS required meetings and conference calls.
- Assist with HMIS projects as needed (LSA, PIT, HIC, CAPER)

POLICY HMIS Member Agency will ensure that at least one person will complete training in order to receive a license to access live client data in HMIS.

PROCEDURE: Once the Agency Administrator/Point of Contact position has been assigned, she or he will be able to work with HMIS Staff to assign end-users and authorize additional licenses for the HMIS Member Agency.

The end-user will complete training and then be responsible for the timeliness of the data being entered and the quality of the data they enter. integrity and accuracy. Licenses are transferrable and the fee is an annual fee. An end-user is a term used to refer to all HMIS users at an HMIS Member Agency. Every HMIS end-user must attend at least one training session and sign an HMIS end-user Agreement. This should be completed within five business days of training. Every HMIS end-user is responsible for the following items:

- Adhering to all of the Policies and Procedures outlined in this document.
- Attending all training required by HMIS staff and the HMIS Member Agency Administrator.
- Entering quality data in a timely and accurate manner.
- Adhere to the data requirements set by the HMIS staff and the HMIS Member Agency.

INITIAL HMIS STAFF SITE VISIT POLICY Prior to signing the HMIS agreements, a prospective HMIS Member Agency will first schedule and complete an on-site Initial HMIS Site Visit with the lead agency staff at the prospective Member Agency.

PROCEDURE: Prior to signing the Agreements for participation, a prospective HMIS Member Agency provider will first schedule and complete an on-site initial HMIS site visit at the prospective Member Agency. This site visit is between the HMIS staff, the prospective HMIS Member Agency Executive Director and other HMIS Member Agency critical staff at the prospective HMIS Member Agency location. Other staff may include data entry staff, supervisors, managers, intake workers, or case managers. The prospective HMIS Member Agency should include any staff they feel are necessary to perform HMIS data entry, data quality or the reporting process. At this site visit, HMIS staff will document the goals of the prospective HMIS Member Agency in regards to HMIS (what do they want to achieve by using the system), go over the required data elements, review the Policy and Procedures, define entry requirements and set expectations. The site visit also allows HMIS staff to properly assess the prospective HMIS Member Agency providers' workflow and user needs, specific implementation issues, and any constraints or risks that will need to be mitigated by the prospective HMIS Member Agency prior to going live. A site demo using a training version of the HMIS system may also be used (at HMIS staff discretion) during the visit to visually explain HMIS and its capabilities.

MINIMAL TECHNICAL REQUIREMENTS POLICY

All HMIS end-user workstations must meet minimum technical requirements in order for HMIS to be functional and to meet the required security specifications.

PROCEDURE:

The following details are the minimal set of technical requirements for hardware and internet connectivity to the HMIS system. HMIS works with all operating systems. (Mac Users should use the latest operating system). Hardware: Laptop, Tablet or Workstation with Internet Connectivity: (High-Speed Internet) either wireless or connected through an ethernet network (LAN). System requirements for the hardware is Windows 8, and Windows 10 (prefer the latest operating system for best results). Authorized Browsers: Firefox (latest version), Internet Explorer (latest version), Safari (latest version), or Google Chrome (latest version), and EDGE (latest version).

POINT OF CONTACT/END-USER ROLE & RESPONSIBILITY

Every HMIS End-user must attend at least one training session and sign an HMIS End-user Agreement. This should be completed within five business days of training. Every HMIS End-user is responsible for the following items:

- Adhering to all of the Policies and Procedures outlined in this document.
- Attending all training required by HMIS staff and the HMIS Member Agency Administrator. Entering quality data in a timely and accurate manner.
- Adhere to the data requirements set by the HMIS staff and the HMIS Member Agency.

INITIAL HMIS STAFF SITE VISIT POLICY:

Prior to signing the HMIS agreements, a prospective HMIS Member Agency will first schedule and complete an on-site Initial HMIS Site Visit at the prospective Member Agency.

PROCEDURE:

Prior to signing the Agreements for participation, a prospective HMIS Member Agency provider will first schedule and complete an on-site Initial HMIS site visit at the prospective Member Agency. This site visit is between the HMIS staff, the prospective HMIS Member Agency Executive Director and other HMIS Member Agency critical staff at the prospective HMIS Member Agency location. Other staff may include data entry staff, supervisors, managers, intake workers, or case managers. The prospective HMIS Member Agency should include any staff they feel necessary to perform HMIS data entry, data quality or the reporting process. At this site visit, HMIS staff will document the goals of the prospective HMIS Member Agency in regards to HMIS (what do they want to achieve by using the system), go over the required data elements, review the Policy and Procedures, define entry requirements and set expectations. The site visit also allows HMIS staff to properly assess the prospective HMIS Member Agency providers' workflow and user needs, specific implementation issues, and any constraints or risks that will need to be mitigated by the prospective HMIS Member Agency prior to going live. A site demo using a training version of the HMIS system may also be used (at HMIS staff discretion) during the visit to visually explain HMIS and its capabilities.

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LAPTOP/WORKSTATION MAINTENANCE:

Browsers should be refreshed on a regular basis to allow for proper speed and functionality. Your device can be set to perform this function automatically in your browser setting after each session is closed. Laptops/Workstations should maintain sufficient virus protection to prevent downtime for maintenance. Regular system maintenance and updates should be applied.

HMIS DATA USAGE

HMIS DATA USAGE POLICY: HMIS Member Agency providers will not violate the terms of use of data within the HMIS system.

PROCEDURE: HMIS Member Agency providers will not breach system confidentiality by misusing HMIS data. HMIS data is not to be used for any purpose outside the use of case management, project evaluation, education, statistical and research purposes.

POLICY: HMIS Member Agency providers shall not use any data within HMIS to solicit clients, organizations, or vendors for any reason.

PROCEDURE: At no time shall confidentiality of clients, organizations, and vendors be violated by disclosing client information to non-members. Data in HMIS will not be used to solicit for volunteers, employees, or clients of any type. This information must not be sold, donated, given, or removed from HMIS for any purpose that would violate client, organization, or vendor confidentiality or put participants at harm or risk. Those found in violation of this rule will have their access to HMIS immediately terminated and the violation disclosed to all local government and funding entities.

POLICY: HMIS Member Agency providers shall not sell any HMIS client, organization, or vendor data for any reason.

PROCEDURE: At no time shall the confidentiality of clients, organizations, and vendors be violated by selling any information. HMIS Member Agency providers shall not profit from disclosure of client, organization, or vendor information. Disclosure of information puts everyone at legal risk. Violation or breaches in HIPAA and 42 CFR regulations can result in fines and jail time. Those found in violation of this rule will have their access to HMIS immediately terminated and the violation disclosed to all local government and funding entities. HMIS Corrective Action.

HMIS CORRECTIVE ACTION

POLICY: If an HMIS Member Agency or any of its end-users have violated any HMIS policy, the HMIS Staff will implement an action plan upon discovery of the violation.

PROCEDURE: Violations in HMIS policy may occur. HMIS Member Agencies will work to ensure violations in policy are prohibited. If a violation is discovered, it is the role of the HMIS staff to swiftly respond in order to prevent further violations from occurring or the current violation from harming clients or other HMIS Member Agencies. The HMIS staff will determine a course of action depending on the type and the severity of the policy violation.

CRITICAL RISK (For example Security Breach, Imminent risk to clients, Unresolved Data Quality Errors) HMIS System Administrator will suspend all HMIS Member Agency Active end-user Licenses. Affected end-users will be suspended until retraining.

- HMIS Member Agency Director immediately reports the violation to the HMIS Lead Agency.
- HMIS Member Agency Director will contact the HMIS Member Project in question to discuss the violation and course of action.
- HMIS Member Agency will be suspended until the violation is resolved and will be placed on probation for at least 90 days.
- HMIS Lead Agency will contact the HMIS Member Agency Contract Manager to discuss violation and action plan.

MEDIUM RISK (For example Grievance has been filed against HMIS Member Agency or general complaints that threaten or endanger clients.)

- HMIS Member Agency immediately contacts and reports to the HMIS Lead Agency to discuss the course of action and plan.
- HMIS Member Agency Director will contact the HMIS Member Project in question to discuss the violation and course of action.
- The HMIS Lead Agency will contact the HMIS Member Agency Contract Manager to discuss violation and action plan.
- HMIS Member Agency will be placed on Probation for at least 90 days and possible suspension until violation resolved. If appropriate, HMIS System Administrator will suspend all HMIS Member Agency's Active end-user Licenses.

LOW RISK (For example Unresponsive HMIS Member Agency to HMIS Requests, Ceased Data Entry, Incorrect Bed List, End-user Inactivity, and Timeliness Issues.)

- HMIS Lead Agency immediately contacts and reports to the HMIS Member Agency Director to discuss the course of action and plan.
- HMIS Member Agency Director will contact the HMIS Member Project in question to discuss the violation and course of action.

PROCEDURES: If appropriate, the HMIS Lead Agency will contact the HMIS Member Agency Contract Manager to discuss violation and action plan. If appropriate, HMIS Member Agency will be placed on probation for at least 90 days or until violation resolved. If appropriate, HMIS System Administrator will suspend all or some of the HMIS Member Agency End-user Licenses in question.

POTENTIAL COURSES OF ACTION

PROBATION

The HMIS Lead Agency will notify the Agency's Executive Director and HMIS Agency Administrator in writing to set up a one-on-one meeting to discuss the violation in question. During the meeting, an action plan will be developed and documented with relevant time frames outlined set to correct actions. If a training issue is identified, the HMIS Agency Administrator will coordinate further follow up with the End-users in question. The Member Agency will be on probation, for a minimum of 90 days, where monitoring and auditing may be required and performed regularly during this period. Notification of probation will be communicated to all local contract managers.

SUSPENSION

If a violation is of critical risk or the corrective measure(s) are not achieved in the probationary period, or more HMIS violations occur during the probationary period, the HMIS System Administrator will suspend access to HMIS until the issues are resolved. The HMIS Member Agency will receive a written notice to the Member Agency's Executive Director of the suspension, reasons, and effective date. During suspension, a mandatory meeting will be held between the Member Agency Executive Director, the CoC Leadership, and the HMIS Staff, if appropriate, to discuss suspension and requirements for resolution. All meeting deliverables will be documented in writing and must be achieved within the set probationary period.

TERMINATION

If the Member Agency violates any policies deemed of critical risk and fails to achieve resolution within the probation period, the HMIS Staff will permanently terminate the Member Agency from HMIS. The HMIS Member Agency will receive a written notice to the Member Agency Executive Director outlining the termination, reasons, and effective date. Notification of the termination will be sent to all local

contract managers. In the case of incurred data quality costs and/or transfer costs, the Member Agency will assume responsibility for payment.

SECTION 4: USER ADMINISTRATION

HMIS END-USER PREREQUISITES POLICY: All HMIS Users are required to have a minimum set of basic computer competency skills to adequately perform their data entry roles in HMIS.

PROCEDURE: Each HMIS Member Agency Administrator should meet the skill requirements set forth for the Agency Administrator in section 3.4. All other HMIS Users should be prepared with basic computer competency skills to adequately be able to use and navigate HMIS. Users will be evaluated for competency at the beginning of training. Users who do not have a minimum competency will be asked to leave training and seek a basic competency class. Basic computer competency classes can be found at a local library, community center, college, or business learning center. Once the user has completed the basic competency class, they can register and attend HMIS training. Upon return, they will be required to produce proof of attendance at the basic computing class.

POLICY: Any prospective HMIS User who was a previous client of the same project he or she now intends to work or volunteer must not have resided at the facility or been a project participant in the last 3 months prior to gaining access to HMIS.

PROCEDURE: The HMIS User for most residential/homeless service projects must not have been a previous client of the same project he/she now intends to work or volunteer for in the last 3 months prior to gaining access to HMIS. An HMIS User should never have access to detailed information on project/service participants that may have received services at the same time as the end-user. Any HMIS Member Agency who violates this rule is putting client information at risk of a privacy and confidentiality breach. Upon discovery of the practice, HMIS Lead staff will immediately inactivate the HMIS User in question and notify the agency administrator and end user of the inactivation in writing.

POLICY: All HMIS Users must be provided the lead agency staff with an end user agreement and be provided training through the HMIS staff or HMIS Agency Administrator prior to entering or accessing client data in HMIS.

PROCEDURE: Due to the amount of personally identifying information and the confidential nature of the HMIS, every HMIS User must be assigned a software license to access the system and their initial training must come from the HMIS Lead staff or HMIS Agency Administrator. In order to receive a license, a potential HMIS User must not violate HMIS policies. Furthermore, a condition of being granted a license is that all users must sign and adhere to an HMIS User Agreement. This document outlines the role and responsibility of having and maintaining their access to HMIS. An HMIS User who violates the HMIS User Agreement will be immediately inactivated from HMIS and required to attend re-training to re-gain access.

POLICY: Notification of issuance and revocation of access within the HMIS is the responsibility of the HMIS Lead Staff.

PROCEDURE: Agency Administrators are responsible for notifying the HMIS Lead staff of a new user, change in user access or deletion of user access within 24 business hours of their organization's needed change to NCFCA HMIS access. Agency Administrators should work with the HMIS Lead staff to ensure proper license access is given to qualified HMIS Users. However, issuance, maintenance, and revocation of software licenses within the HMIS Lead is the sole responsibility of HMIS Lead staff.

ASSIGNMENT OF END-USER SECURITY SETTINGS.

The HMIS Lead staff will assign the security level of every end-user based on the agreed-upon security settings established by the Member Agency at the Initial HMIS site visit. The Agency Administrator or Executive Director will assign access to individuals based on their role in the organization and needed access to HMIS. Assignments are best organized by the lowest level of security the staff or volunteer member would need to perform their normal work duties as defined by their official job/position description. If the HMIS User is to remain on the system but has had a change in responsibilities, an Agency Administrator or Executive Director may request a change in any end-users security setting.

ADDITIONAL LICENSES/CHARGES

Licenses are allocated on a first-come-first-served basis based upon agency size, use, and adherence to all Policies and Procedures set forth in this document. If there are no more licenses available, the user will have to wait until a license is available or the HMIS Member Agency may purchase a license for the HMIS User. User licenses usually become available in October.

HMIS LEAD STAFF REMOVING A USER LICENSE FOR CAUSE

HMIS Lead reserves the right to inactivate or delete the license for any end-user for cause. In all cases where a licensee is removed for cause, the assigned HMIS Member Agency Administrator and Executive Director will be notified immediately via email with the stated cause of license removal. Reasons that a licensee would lose their license or otherwise have their license temporarily inactivated or revoked would include, but not be limited to:

- A consistent lack of good data quality.
- Sharing system credentials (login and password) with any other party, unless HMIS Lead is aware.
- Allowing non-authorized users to view any data from, have access to, see the screens of, or be provided any print outs of client data from HMIS.

OTHER VIOLATIONS OF THESE HMIS POLICIES.

Other serious infractions that result in a compromise of the HMIS Member Agency and/or any client-level data in the system.

- Agency removing a user license an HMIS User license can only be deactivated by the HMIS Lead staff. Requests for removal or other change of a license by an HMIS Member Agency can only come from the Agency Administrator or Executive Director.
- The request must be submitted in writing via email or Help Desk (once software acquired).
- All license requests should be communicated to HMIS within 24 business hours after the end-user has left the employment of the HMIS Member Agency, the HMIS User has changed positions and is no longer in need of HMIS access, or has knowingly breached or is suspected of a system breach where client data has been compromised.

LAW ENFORCEMENT POLICY:

No active member of law enforcement or detention and corrections staff at this time are authorized HMIS Users.

PROCEDURE:

To protect current clients who may be accessing health and human service projects from harassment or harm, active members of law enforcement will not be granted access to HMIS. Limited exceptions may be negotiated and an agreement executed with HMIS, & the local COC, when there is a project with direct involvement in an active homeless jail diversion and/or prison release project. Any agreement with exceptions must include a statement that: HMIS use is (1) is limited to the purpose for which it was intended, and (2) is only for work with project involved clients. Former members of law enforcement who may volunteer or are employed at a homeless service provider post-law enforcement career may have access to HMIS if it is imperative to their new responsibilities. HMIS will consider and respond to requests by law enforcement with next of kin searches, searches for clients and in the interest of public safety a person(s) who law enforcement has probable cause or an active warrant for his/her arrest related, to a violent crime and other felony crimes. HMIS will provide law enforcement information related to evidence and information gathering concerning a criminal matter via Court Order, such as a search warrant or subpoena.

Section 5: Clients' Rights/Client Consent

HMIS Release of Information (ROI)

The HMIS Release of Information (ROI) form is used to control how client data is shared in HMIS. It should be kept by the HMIS Member Agency and protected from loss or theft. Member Agencies are required to use the HMIS Release of Information form provided. Release of information is specific to sharing data among providers in the Continuum of Care, as well as HMIS Member Agencies. HMIS Users should strive to communicate a Release of Information in a language the client understands. The head of the household may sign for any children or members of the household under the age of 18 on the same form. Along with the ROI, other documents can also be scanned and uploaded in HMIS :

They are:

- ROI Form,
- Proof of Homelessness,
- Proof of Chronic Homelessness Status,
- SSN Card,
- Proof of Disability,
- Proof of Insurance,
- Proof of Income,
- Proof of Non-cash Benefits (Food Stamps, Medicaid Card)
- Lease for Clients' Housed ,
- Upon Exit from the project (PSH Only) Destination documentation.

Agencies must make reasonable accommodations for persons with disabilities throughout the data collection process. This may include, but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. Agencies that are recipients of federal assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the project.

CLIENT ACCESS TO INFORMATION

POLICY: All clients entered into HMIS have a right to view information within their electronic HMIS file

PROCEDURE: If an HMIS Member Agency has a written policy for providing copies of their paperwork or data collection to clients, the HMIS Member Agency may follow its procedures to allow for providing copies of the HMIS data they collected. Clients can request a copy of their information in writing to the HMIS staff through email or regular mail. Once received, the HMIS staff will fulfill the client's request in an expedited manner.

FILING A GRIEVANCE

POLICY: Will updated once Grievance Procedure approved by Board

Clients have the right to file a grievance with the HMIS Lead staff about any HMIS Member Agency related to violations of access in HMIS, violations of HMIS Policies and Procedures, or violations of any law.

PROCEDURE: HMIS staff will hear from any client who wishes to file a grievance against any HMIS Member Agency. HMIS staff will request that a client fill out a Client Grievance Form, which can be obtained by contacting the HMIS staff by phone, email or regular mail. Once completed and submitted by the client, HMIS Staff will investigate the complaint and provide its findings to the client who lodged the grievance. HMIS Staff will notify the parties involved about the alleged incident reported. If the

client is not satisfied with the findings of the grievance, the client must submit a grievance request in writing to the U. S. Dept. of Housing and Urban Development. GET ADDRESS for HUD

POLICY: Other HMIS Member Agencies have a right to file a grievance with the HMIS staff about any HMIS Member Agency related to violations of access in HMIS, violations of HMIS Policies and Procedures, or violations of any law.

PROCEDURE: HMIS staff will entertain any HMIS Member Agency who wishes to file grievance against any other HMIS Member Agency. In cases where a client leaves one HMIS Member Agency to receive services from another HMIS Member Agency and the client reports a suspected violation, the new HMIS Member Agency does have a right to file a grievance or duty to warn the HMIS staff on behalf of the client as long as the client grants their permission to file a grievance on their behalf. HMIS staff will request a Client Grievance Form be completed by either the client or the HMIS Member Agency. The form can be obtained by contacting the HMIS staff by phone, email or regular mail. Once completed and submitted by the client, HMIS Staff will investigate the complaint and provide its findings to the client who lodged the grievance. HMIS staff will notify the parties involved and the governance board about the alleged incident reported. If the client is not satisfied with the findings of the grievance, the client must submit a grievance request in writing to the U. S. Department of Housing and Urban Development. ADDRESS & EMAIL

REVOKING AUTHORIZATION FOR HMIS DATA COLLECTION

POLICY: All clients who initially agree to participate in HMIS have the right to rescind their permission for data sharing in HMIS.

PROCEDURE: Clients who choose to revoke their information-sharing authorization must complete a new Release of Information. The new Release of Information should be sent by the Agency Administrator who will notify the HMIS Staff that the client record is to be “closed” in the system. The HMIS staff will be responsible for closing the client record from view. Once closed, the HMIS Member Agency will no longer be able to share future client data entered into HMIS. However, data entered prior to the record being closed can still be viewed and shared with other Member Agency providers. The new Release of Information should be kept on file by the Member Agency. After a Release of Information is signed and a client is accepted into an HMIS participating financial assistance project, the client must sign a client consent form and HMIS staff must be notified to re-open the client record for sharing. The notification to re-open the file must be submitted in writing, along with a scanned copy of the client’s newly signed consent.

SECTION 6: PRIVACY, SAFETY & SECURITY

NATIONAL PRIVACY REQUIREMENTS

POLICY: HMIS complies with all federal, state, local laws, standards, and regulations.

PROCEDURE: It is imperative that partner agencies have Policies and Procedures in place that ensure compliance with applicable laws and regulations that govern their projects.

HIPAA COVERED ENTITIES: Any Agency that is considered a “covered entity” under the Health Insurance Portability and Accountability act of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S. Department of Health and Human Services is required to operate in accordance with HIPAA regulations. More information about 45 C.F.R. may be found at [http://www.hhs.gov/ocr/privacy/42 CFR Part 2 Entities](http://www.hhs.gov/ocr/privacy/42%20CFR%20Part%20Entities). Any Agency that is considered a “covered entity” under 42 C.F.R. Part 2, and corresponding regulations established by the U.S. Department of Health and Human Services is required to operate in accordance with the corresponding regulations. More information about 42 C.F.R. may be found at http://www.access.gpo.gov/nara/cfr/waisidx_02/42cfr2_02.html Domestic Violence (DV) Shelters. Any agency that is a victim service provider is barred from disclosing identifying information to HMIS as of 2007. More information about DV Shelters and HMIS may be found at: <http://epic.org/privacy/dv/HMIS.html>

OTHER ENTITIES: Any Agency that is NOT considered a “covered entity” under any of the above-mentioned projects is required to operate in accordance with HMIS privacy and security rules, as well as any applicable federal, state, local laws and regulations. More information about HMIS Privacy and Security Rules may be found at https://www.hudexchange.info/resources/documents/HEARTH_HMISRequirementsProposedRule.pdf

POLICY: HMIS Member Agency providers must post an HMIS Privacy Notice prominently on their websites and in areas of plain view of the public such as waiting rooms, intake areas, lobbies, or screening or assessment areas. HMIS Member Agency providers are required to provide a copy of the HMIS Privacy Notice to all clients upon request by the client.

PROCEDURE: By law, HMIS Member Agency providers are required to post a Privacy Notice that discloses the collection and use of Client Information. HMIS has developed a document for posting for providers without adequate notice. The HMIS Privacy Policy and Notice are documented in **Appendix V**. System Security and Privacy Statement

POLICY: System Security and Privacy Statement

The HMIS Lead Agency has implemented extensive technical and procedural measures to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data as recommended in the HMIS Data and Technical Standards.

PROCEDURE: The security and confidentiality of homeless and at-risk client information within HMIS is a major issue. For certain providers and subpopulations, such as Domestic Violence Shelters, Substance Abuse Facilities and HIPAA Covered Entities, security, and confidentiality of client information becomes even a much larger concern for all involved. The HMIS Data and Technical Standards, published June 30, 2004, and updated through 2014 by the U.S. Department of Housing and Urban Development (HUD), include extensive HMIS Privacy and Security Standards to be followed by Continuum of Care, Homeless Assistance Providers, and HMIS Software companies. These standards were developed after careful

review of the Health Insurance Portability and Accountability Act (HIPAA) standards for securing and protecting patient information. The HMIS has and will continue to be in compliance with these privacy and Security Standards even while not being considered a HIPAA covered entity as an HMIS Lead Agency.

POLICY:

HMIS secures the location of the server in a controlled hosting environment providing security from data loss and theft.

PROCEDURE: HMIS contracts with a HUD-approved software vendor to provide HMIS to the Continuum of Care. As a web-based HMIS solution, the HMIS software and databases are hosted on secure servers in a highly secure computer room accessible only by very few employees who are responsible for maintaining and supporting the system. The vendor computers are also protected by firewalls to prevent unauthorized external access.

POLICY: HMIS ensures that only appropriate staff and volunteers at HMIS Member Agency providers gain and retain system access through a user authentication process.

PROCEDURE: As an Internet-based software system, each HMIS User accesses the system via their internet web browser via a web portal with their username and a password. All user names and initial temporary passwords are issued by HMIS staff only. After three failed login attempts, user ID's and passwords automatically become inactive and users must contact an Agency Administrator or HMIS staff for reactivation. Passwords are always encrypted and can never be seen in cleartext.

POLICY: HMIS secures data as it is traveling over the Internet and stored on the centralized server by proving encryption for all data.

PROCEDURE: As a cloud or web-based software system, it is imperative that all data travel through the Internet encrypted or unreadable to an outside user. All HMIS transactions are fully encrypted using Secure Socket Layer (SSL) with 128-bit encryption. This is the highest commercially available encryption level and is the same as used by financial institutions. Users can be assured that the data they are interacting with is secure by noticing the URL, or Web Address while using HMIS begins with the letters HTTPS (HyperText Transfer Protocol Secure).

POLICY: HMIS staff, in conjunction with the HMIS Member Agency Administrator, ensures that all HMIS Users have access to the components of the system appropriate for their level of data usage.

PROCEDURE: The HMIS software has a built-in security system that ensures each user only has the minimum access needed to perform their normal duties. Each HMIS user is assigned a security level in their user profile that grants them access to only the areas they need to accurately do their work. A change to the level of system security for an end-user may only be requested by an Agency Administrator or Executive Director for which the end-user works.

POLICY: HMIS staff use audit trail tools to ensure system maintenance, investigate privacy, security breaches or filed client grievances.

PROCEDURE: The HMIS software has built-in audit trail applications that allow administrators to audit the use and access of data. Audit reporting is an integral part of maintaining system security protocols and is performed on a scheduled basis by HMIS staff.

POLICY: The HMIS is a shared information system with default visibility and security exceptions preset by HMIS staff based on the workflow of the Member Agency.

PROCEDURE: Pursuant to 42 and 45 CFR notwithstanding, HMIS is an open or shared HMIS system. The default visibility settings for clients will be set to OPEN for all HMIS clients that are not registered or receiving services from any 42 or 45 CFR facility or project. If a client is enrolled in a 42 or 45 CFR covered entity project, project visibility settings will be set in accordance with applicable laws. The HMIS system utilizes a set of Visibility Settings that allow the sharing of only agreed-upon data elements among the participating HMIS Member Agencies. The HMIS system utilizes a set of Deny Exceptions that disallow sharing of certain information by provider projects based upon federal, state, or local laws and guidelines, and by agreement with each HMIS Member Agency provider. System Visibility settings may only be changed by the HMIS staff. Requests to change visibility settings must be made via written request to HMIS staff. The HMIS system is constructed to offer a dynamic range of levels of security based on the needs of the agency and MSCCOC_HMIS User. As a default, HMIS Users will only have enough security access to perform their normal job duties. Requests to change a user status must come from an HMIS Member Agency Administrator or Executive Director.

DATA OWNERSHIP POLICY: All data is governed by the owner(s) of the data with regard to data use and disclosure.

PROCEDURE: The client ultimately retains ownership of any identifiable client-level information that is stored within HMIS. If the client consents to share data, the client, or agency on behalf of the client, has the right to later revoke permission to share her or his data without affecting rights to service provision, system maintenance, investigate privacy, security breaches or filed client grievances.

Section 7: USER TRAINING

POLICY: All HMIS Users are required to have basic computer competency prior to attending any HMIS training.

PROCEDURE: All users must have internet access and a company email address (personal if the agency agrees). Email must be able to be accessed over the internet.

POLICY: HMIS Lead Agency or HMIS Agency Administrator will provide all of the training needs.

PROCEDURE: If the user is having issues getting the system up and running, email hmis@ncfalliance.org or call us for help at 352-333-0867.

ONSITE TRAINING: HMIS staff is available to deliver onsite training in the event that an agency has a large number of staff to train or wants a specific topic covered. During times that onsite training is not feasible a Zoom training can be scheduled. There will also be a library of training videos that can be accessed by contacting the HMIS Lead Staff.

SECTION 8: HMIS TECHNICAL SUPPORT

POLICY: The Homeless Management Information System staff have provided a system that will allow HMIS Users to request technical assistance regarding the database.

POLICY: The HMIS staff will respond to all inquiries from Member Agencies and clients in a timely manner.

PROCEDURE: Response times for technical assistance varies based on the item that is submitted and the priority associated. HMIS Staff reserve the right to adjust priority levels based on the type of the request. Requests for routine system technical support will be honored on a first come-first served basis during normal business hours.

POLICY: HMIS Staff will submit to the vendor all feature enhancement requests submitted through the proper channels from Agency Administrator(s) or HMIS Users.

PROCEDURE: It is a stated goal of HMIS to be as efficient and user-friendly as possible within the technical restraints of the system. Feature enhancement requests are welcomed and encouraged. Please submit all possible feature enhancements in the following manner: Begin by submitting an email to hmis@ncfalliance.org. Be as specific as possible in the request. If appropriate, describe the current workflow first and the suggested feature enhancement right after. Screenshots and files can be attached to the Help Ticket. If enhancement is for new system functionality, please describe a workflow and diagram as much as possible. If appropriate, please denote how much time savings would be achieved if the feature enhancement were to be enacted. If appropriate, please denote all of the possible benefits for your agency or end-users and other Member Agency providers if feature enhancement were to be enacted.

POLICY: The Homeless Management Information System staff will hold mandatory periodic in-person meetings or conference calls to discuss system changes and provide technical support.

SECTION 9: DATA COLLECTION PROCESS

CLIENTS SERVED VS. CLIENTS BENEFITING FROM SERVICE

POLICY: All client data entered into HMIS by the Member Agency should be that of clients and/or his/her family that are receiving service.

PROCEDURE: Clients entered into HMIS should consist of the clients in attendance at the day of enrollment into the project or services, and can consist of minors under the age of 18 if the legal guardian consents to their entry into HMIS. Unless the program is children only program. HMIS is not meant for adult clients who are not in attendance or may benefit from services at a later date. HMIS Member Agency providers should refrain from entering adult clients into HMIS that are not physically seen to be enrolled in the project or provided the service because they cannot give consent in absentia. For those providing financial assistance services per address, it is expected each member of the household receiving the service by the same address must provide consent and be entered as a household unit in HMIS and linked together using a service transaction, otherwise, there is a risk of duplication of services. Data on all members of the family should be entered individually, but tied together as a household. The head of household can give consent for all minor children (under 18 years of age) in a family but cannot give consent for any adult members (over the age of 18). All adults must give their consent individually.

DATA ENTRY REQUIREMENTS

POLICY: The Homeless Management Information System staff requires each HMIS Member Agency to enter client-level data based on a set of predefined data standards.

PROCEDURE: HMIS data standards are based on the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards. Every project entering into HMIS must adhere to the requirements set by HUD and the local Continuum of Care. Every project entering data into HMIS is evaluated based on the following elements: completeness, consistency, accuracy, and timeliness. Refer to Section 10 on Data Quality for details. Providers are required to enter the following Universal Data Elements as outlined in the Data Quality Plan. The elements required for every person who is entered in the system are:

- Release of Information documented,
- Name (First, Last) Data Quality,
- Social Security Number (partial or full) Data Quality,
- Date of Birth Data Quality,
- Race,
- Ethnicity,
- Gender,
- Veteran Status,
- Disabling Condition,
- Project Start Date,
- Project Exit Date,
- Destination,
- Relationship to Head of Household,

- Client Location,
- Housing Move-in Date,
- Living Situation

PROCEDURE FOR MCKINNEY-VENTO FUNDED PROJECTS

HMIS Member Agencies who are funded through any of the programs below must meet the basic requirements set by HMIS and also meet additional Program Specific Data Elements (PSDE). Found at:

- HUDHRE. com
- [https://www. hudexchange.info/Emergency Solutions Grant \(ESG\);](https://www.hudexchange.info/Emergency Solutions Grant (ESG);)
- Supportive Services for Veteran Families (SSVF)
- VA Grant and Per Diem Program (GPD)
- Rapid Re-Housing Program (RRP);
- Projects in Assistance of Transition from Homelessness (PATH);
- Supportive Housing Program (SHP);
- Shelter Plus Care (S+C);
- Section 8 Moderate Rehabilitation for Single Room Occupancy (SRO);
- Housing Opportunities for Persons with AIDS (HOPWA).

Additional program-specific data elements to be collected are detailed in the 2020 HUD Data Standards and vary by program type (e. g. PATH, SSVF, RHY, ESG, etc.) and may include:

- Housing Status,
- Income amount,
- Income Source(s),
- Income Date(s),
- Non-Cash Benefits,
- Non- Cash Benefits Source(s),
- Non-Cash Benefits Date(s), and Sources,
- Health Insurance, Health Insurance Source(s),
- Health Insurance Information Date,
- Reason for No Health Insurance (if applicable),
- Disability Type,
- Domestic Violence Victim/Survivor,
- Domestic Violence Information Date,
- Contact Date (Street Outreach Only),
- Date of Engagement (Street Outreach and Services Only Projects).
- Services Provided (PATH, HOPWA, & VA Funded),
- Referrals Provided,
- Residential Move-in Date,
- Housing Assessment Disposition and,
- Housing Assessment at Exit.

The housing status must be recorded at Project Start. The client's income and sources must be recorded at Project Start and verified at least one time during a year if in the project over a year. It is recommended that Member Agencies and Agency Administrators review the most current 2020 Data Dictionary at <https://files.hudexchange.info/resources/documents/HMIS-Data-Dictionary.pdf> and the most current 2020 Data Standards at <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

POLICY: All Housing Providers are required to maintain the most current bed inventory in HMIS.

PROCEDURE: All Housing Providers must work with HMIS Staff to build accurate bed lists in HMIS. Each HMIS bed list should be assigned to the appropriate project (Emergency, Transitional, Permanent Supportive, etc.).

OPTIONAL REQUIREMENTS

POLICY: All Member Agency providers are encouraged to record all Program-Specific Data Elements (PSDE) for all clients entered into HMIS even if not required for funding.

PROCEDURE: Optional PSDE is a valuable area of the client record and part of case management. Therefore, though not required, HMIS Users are encouraged to complete these elements for each client, especially if the client is in a housing or financial assistance project. The optional PSDE include Employment, Adult Education, General Health Status, Pregnancy Status, Veteran’s Information, and Children’s Education.

HMIS CLIENT PHOTO ID CARDS

POLICY: Member Agency providers are encouraged to create and disseminate HMIS Client Photo ID Card for all homeless clients being entered into HMIS.

PROCEDURE: Continuum of Care has established the HMIS Client Photo ID Cards as the identification for all homeless clients in the system. Homeless and at-risk homeless clients can be issued an HMIS Client Photo ID Card at their first point of entry into the Continuum of Care. The cards may be issued at major continuum points of access such as day centers and one-stop centers or by other Member Agency providers when a service is rendered.

POLICY: HMIS Member Agency providers are encouraged to use the HMIS Client Photo ID Cards for all clients for which they are providing services as proof of ID to rapidly check clients into services and projects.

SECTION 10: DATA QUALITY

Data quality is vitally important to the success of the Homeless Management Information System. HMIS Member Agency providers and HMIS staff will work diligently on adhering to the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely. Adherence to set data quality standards will help bring additional funded dollars into our community as well as ensure our data reflects our community level of service when reported locally, statewide, or nationally. Data quality will be evaluated on accuracy, completeness, consistency, and timeliness. This data will be used by the Continuum of Care to monitor progress towards meeting its benchmarks.

What is Data Quality?

Data quality is the reliability and validity of client-level data collected. Good data quality accurately reflects actual client information in the real world and has the ability to tell a client's story. It also aids case management in assessing client needs and determining appropriate services. Data quality is determined by several factors such as timeliness, completeness, coverage and accuracy. For system performance measurement, HUD's expectation is that HMIS data be complete and accurate dating back to October 1st, 2012.

What is a Data Quality Plan?

A data quality plan is a community-level document that assists the CoC in achieving statistically valid and reliable data. The plan sets expectations for both the community and the end users to capture reliable and valid data on persons accessing the homeless assistance system. The plan:

- Establishes specific data quality benchmarks for coverage, timeliness, completeness, accuracy, and consistency;
- Identifies the responsibilities of all parties within the CoC with respect to data quality;
- Establishes a timeframe for monitoring data quality on a regular basis.

POLICY: The Homeless Management Information System staff will evaluate the quality of all HMIS Member Agency data on the accuracy of the data entered monthly.

PROCEDURE: Accuracy is the degree to which data correctly reflects the client's situation or episode as self-reported by the client.

Please see addendum ___ for the full Data Plan

SECTION 11: PERFORMANCE MEASUREMENT

HMIS staff will measure the performance of HMIS Member Agency providers as it relates to the quality of the data entered into the system. Additionally, performance on a system-level will be measured to show the progress towards our Continuum of Care in ending homelessness.

POLICY: HMIS staff will measure the timeliness and completeness of data entered by each HMIS Member Agency.

PROCEDURE: As a quality monitoring tool, the HMIS staff will measure the effectiveness of data entry performed by each HMIS Member Agency. These reports will be generated out of the system on a monthly basis. Each HMIS Member Agency will have 5 business days to seek technical assistance regarding any data quality issues & to correct any issues.

POLICY: HMIS staff will measure the bed utilization rates of homeless housing providers.

PROCEDURE: As a quality monitoring tool, the HMIS staff will periodically review the bed utilization rates of HMIS Member Agencies.

APPENDIX – EMERGENCY CONTACTS

This appendix lists the names, contact information, and email addresses for key personnel in the event of an emergency or disaster.

NAME EMAIL ADDRESS PHONE

Patrick Dodds pdodds@unitedwayncfl.org 352-333-0866

Brenda Chamberlain bchamberlain@unitedwayncfl.org 352-333-0867



FL-508 NORTH CENTRAL FLORIDA ALLIANCE FOR THE HOMELESS & HUNGRY HMIS DATA QUALITY PLAN

Developed by HMIS Lead Agency

July 2020

I INTRODUCTION

This document describes the Homeless Management Information System (HMIS) data quality plan for the FL-508 North Central Florida Alliance for the Homeless and Hungry Continuum of Care (CoC). HMIS is a locally administered electronic system that stores client-level information about persons who access homeless services in a community. The HMIS Lead for the CoC is United Way of North Central Florida. The document includes a Data Quality Plan and protocols for ongoing data quality monitoring that meet requirements set forth by the Department of Housing and Urban Development (HUD). This HMIS Data Quality Plan is to be updated annually to reflect the latest HMIS data standards and locally developed Data Quality Thresholds.

HMIS Data and Technical Standards

Each CoC receiving HUD funding is required to implement and participate in HMIS to capture standardized data about all persons accessing homeless assistance in the area. The Homeless Management Information System complies with HUD's official data and technical standards published on HUD's Resource Exchange.

In 2010, the U.S. Interagency Council on Homelessness (USICH) affirmed HMIS as the official method of measuring outcomes for homelessness in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. Many federal partners that provide services to specific homeless populations have joined together to work in a coordinated effort to end homelessness using HMIS data:

- **U.S. Department of Housing and Urban Development (HUD)**
- **U.S. Department of Health and Human Services (HHS)**
- **U.S. Department of Veteran Affairs (VA)**

In May of 2014, HUD published final HMIS Data Standards to ensure consistent reporting across federal agencies. The 2014 Data Standards revise and replace the 2010 HMIS Data Standards which guide client- and program-level data reporting. The 2014 Data Standards identify Universal Data Elements and Program Specific Data Elements that are required of all homeless programs participating in the HMIS. In October of every year HUD releases updates to the HMIS Data Standards so it is important that this plan be reviewed annually for any necessary revisions.

What is Data Quality?

Data quality is the reliability and validity of client-level data collected. Good data quality accurately reflects actual client information in the real world and has the ability to tell a client's story. It also aids case management in assessing client needs and determining appropriate services. Data quality is determined by several factors such as timeliness, completeness, coverage and accuracy. For system performance measurement, HUD's expectation is that HMIS data be complete and accurate dating back to October 1st, 2012.

What is a Data Quality Plan?

A data quality plan is a community-level document that assists the CoC in achieving statistically valid and reliable data. The plan sets expectations for both the community and the end users to capture reliable and valid data on persons accessing the homeless assistance system. The plan:

- Establishes specific data quality benchmarks for coverage, timeliness, completeness, accuracy, and consistency;
- Identifies the responsibilities of all parties within the CoC with respect to data quality;

- Establishes a timeframe for monitoring data quality on a

What is a Data Quality Monitoring Plan?

A data quality monitoring plan is a set of procedures that outlines a regular, on-going process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the program and aggregate system levels. This plan includes roles and responsibilities for the CoC, the HMIS Administrator, and the Data Performance Committee.

II DATA QUALITY PLAN

Benchmarks and Goals:

Timeliness

Timeliness answers the question: “How often are projects entering their data?”

When data is entered in a timely manner, it can reduce human error due to too much time between data collection and data entry. Relying on notes or memory of a conversation can lead to incorrect or incomplete data entry. Timely data entry also ensures accessibility of information for the entire CoC for Coordinated Entry and project evaluation.

Street Outreach

- Live time or within 24 hours of contact with the client

Emergency Shelter

- Live time or within 24 hours of contact with the client

Services Only (excludes Coordinated Entry)

- Live time or within 48 hours of contact with the client

Transitional Housing

- Live time or within 48 hours of contact with the client

Rapid Rehousing

- Live time or within 48 hours of contact with the client

Permanent Supportive Housing

- Live time or within 48 hours of contact with the client

Coordinated Entry

- Live time or within 24 hours of contact with the client

Homelessness Prevention

- Live time or within 48 hours of contact with the client

Completeness

Completeness answers the question: “Is the required client data being entered completely for each project?”

Complete data is the key to assisting clients in finding the right services and benefits to end their homelessness. Incomplete data may hinder an organization’s ability to provide comprehensive care to the clients it serves. Incomplete data can also negatively impact our CoC’s ability to track and report patterns in client information and changes within the homeless population and adapt strategies appropriately. HMIS data quality is also part of funding applications, including CoC, DCF, and HUD. Because of this, low HMIS data quality scores could potentially result in denial of our future funding requests.

Our completeness goal is for all project types to collect at least **95%** of all data elements. For Outreach projects this would only apply after a client has a “Date of Engagement”.

Coverage

Coverage answers the question: “Do we know how many Homeless Assistance and Prevention projects in our CoC are actively participating in our HMIS?”

To provide a complete view of the homeless housing and services provided in our CoC it is essential that we include as many of those projects as possible in our HMIS. Towards this end our HMIS lead team is responsible for encouraging and recruiting all applicable projects to enter data in our HMIS. The project coverage goal for all housing types as recorded in our housing inventory chart is **95%**.

For those projects entering data into our HMIS, reviewing bed and unit utilization is important to determine whether clients are being entered and exited in a timely manner which could result in over or under-utilization and could illuminate whether a project’s bed-count has changed without notice to the HMIS Administrative team and is in need of adjusting within the HMIS.

For these reasons, it is expected that all programs using the HMIS shall enter data on 100% of all clients they serve unless prohibited by DV restrictions or client refusal.

Acceptable range of bed/unit utilization rates for established projects:

- Emergency Shelters: 85%-105%
- Transitional Housing: 85%-105%
- Permanent Supportive Housing: 85%-105%

The CoC recognizes that new projects may require time to reach the projected occupancy numbers so considerations will be provided during the first six months of operating.

Accuracy and Consistency

Accuracy and consistency answer the questions: “Does our HMIS data accurately reflect the information of our homeless clients? Are the necessary data elements being recorded in HMIS in a consistent manner?”

Information entered into the HMIS needs to be valid, i.e. it needs to accurately represent the information of the people that enter any of the homeless service programs contributing data into our HMIS. Each person should only have one client record in the system, so HMIS administrative staff will regularly run reports to identify and merge duplicated client files. The HMIS administrative team will also run data incongruity reports to identify clients with data accuracy errors. These errors will be sent to project staff for corrections and possible re-training.

Data consistency ensures that data is understood, collected, and entered consistently across all projects in the HMIS. Consistency directly affects the accuracy of data. All data in HMIS shall be collected and entered in a common and consistent manner across all programs. To that end, all intake and data entry workers will complete an initial training before accessing the live HMIS system, and access additional training opportunities offered by the HMIS Lead. It is also the responsibility of the HMIS administrative team to ensure that all assessment question lists and workflows in the system are standardized as much as possible between all projects so that everyone is entering the data in the same way.

III DATA QUALITY MONITORING PLAN

Roles and Responsibilities:

CoC Governance Board

The CoC Governance Board will provide overall direction to the HMIS team and provide oversight of the HMIS Lead. The Board will maintain an ongoing relationship with the HMIS Lead to identify training needs for the CoC based on the reports provided by the HMIS Team to the Data Performance Committee. Additionally, the Data Performance Committee will make recommendations to the CoC Governance Board for enforcement measures of community data quality.

HMIS Lead (United Way of North Central Florida)

Report Maintenance –

The HMIS Administrator is responsible for building reports and making them available to the CoC. This includes the data quality reports necessary for data correction. The HMIS staff will be responsible for the ongoing maintenance of existing reports as well, which includes changes in reports as updates are made to the system.

Training –

The HMIS team at United Way of North Central Florida is also responsible for providing the necessary training for the CoC. In addition, HMIS staff is available to provide technical assistance to users that need help correcting data entry errors.

Monthly Monitoring –

On a monthly basis the HMIS staff will provide to the Data Performance committee data quality reports for all funded agencies using HMIS through our Scorecard Reports. Additional training will be

provided to those agencies that need to improve their data quality. These reports will provide information on timeliness, bed utilization rates, and data completeness for all funded projects.

Quarterly Monitoring –

On a quarterly basis, the HMIS staff will provide to the Data Performance Committee data quality reports for all agencies using HMIS and offer additional training to those agencies that need to improve their data quality. The quarterly reports for the Data Performance Committee will provide information on timeliness, bed utilization rates, and data completeness for all projects.

HMIS Data Quality Plan Enforcements

The HMIS Team will provide reports to the Data Performance Committee with a recommended plan of action for any agencies out of compliance with the data quality plan or other HMIS policies or procedures. The Data Performance Committee will discuss and vote whether to approve the recommended plan. An e-mail should be sent by the HMIS Lead to the agencies identified as having data quality issues within 5 business days of the committee meeting, and saved for record keeping purposes.

The Data Performance Committee may require that the agencies provide a corrective action plan which may include HMIS refresher training for all staff members in the project and technical assistance to the agencies' program manager(s).

If the data quality issues are not resolved by the third quarterly review, the Data Performance Committee will make a recommendation to the CoC Governance Board to request a meeting with the agency executive director, and may ultimately decide to suspend the agency's access to HMIS until a more formal Data Quality Plan for the agency is approved by the Data Performance committee and then the CoC Governance Board.



HMIS Privacy Policies and Procedures

The goal of the FL-508 Homeless Management Information Systems (HMIS) Privacy Policies and Procedures is to ensure confidentiality and security of all client data captured in HMIS in conformity with all current regulations related to privacy and data confidentiality rights.

Outlined in this HMIS Privacy Policies and Procedures are the FL-508 Continuum of Care (CoC) standards and parameters to be followed by all HMIS Participating Agencies (PA). The CoC recognizes its participating agencies may have established their own policies that meet HUD privacy requirements and the CoC standards set forth herein. The HMIS Privacy Policies and Procedures is not intended to supplant individual PA privacy policies. If PA privacy policies and practices meet the thresholds established in this policy and do not contradict the practices described, PAs may establish additional or more stringent requirements for HMIS end users. Additionally, this policy serves to describe how the HMIS Lead Agency and the HMIS meet the privacy requirements established in HUD privacy standards.

Policy Access and Amendment

The HMIS Lead Agency may amend its privacy policy and practices at any time, subject to the recommendation of the HMIS Support Committee. The HMIS Lead Agency may bring issues to the CoC Steering Committee as necessary. An amendment may affect data that had been entered in the HMIS before the effective date of any such amendment. This policy is consistent with current privacy standards for HMIS issued by HUD.

The Privacy Policy will be reviewed and amended consistent with the procedure described in the Roles and Responsibilities section of the HMIS Policies and Procedures.

Applicability

The HMIS Privacy Policies and Procedure applies to the HMIS Lead, PAs, and any person accessing HMIS data. PA projects subject to the privacy rules established under the authority of the Health Insurance Portability and Accountability Act (HIPAA) or other more restrictive policies will be honored.

The limitations of the HMIS implementation are described in the Client Informed Consent and Privacy Rights section of the HMIS Policies and Procedures.

The HMIS Lead Agency and PAs will uphold federal and state confidentiality regulations to protect client records and privacy. If a PA is covered by more stringent regulations, such as HIPAA, the more stringent regulations will prevail. Any project not subject to the HMIS Privacy Policies and Procedures will be identified in the PA's HMIS Agency Participation Agreement.

Participating Agency Policy

Each PA is responsible for maintaining a privacy policy and certifying that each participating project complies with the HMIS Privacy Policies and Procedures. PA Administrators are responsible for reviewing privacy policies and ensuring consistency with the HMIS Privacy Policies and Procedures. At times, PAs may require more rigorous privacy standards but they must, at minimum, meet and not contradict the privacy standards set forth herein. In addition, PAs must maintain documentation regarding changes to their privacy policies.

Each PA will adopt the standard policy or their own, as long as the policy meets and does not contradict with the privacy standards set forth in this Policies and Procedures.

A PA's Privacy Policy will:

- Specify the purpose for collecting the information.
- Specify all potential uses and disclosures of client personal information.
- Specify the time for which the hard copy and electronic data will be retained at the organization and the method for disposing of it or removing identifiers from personal information that is not in current use.
- State the process and applicability of amendments and commit to documenting all amendments.
- Offer reasonable accommodations for persons with disabilities and/or language barriers.
- Allow the client the right to inspect and to have a copy of their client record and offer to explain any information the individual may not understand.
- Include reasons and conditions when an organization would not release information.
- Specify a procedure for accepting and considering questions or complaints about the privacy policy.

Compliance Review

The HMIS Lead Agency is responsible for ensuring HMIS is operated in accordance with HUD standards. PAs are responsible for conducting annual reviews certifying each participating project complies with the HMIS Privacy Policy and HUD standards. The FL-508 CoC, through the HMIS Lead Agency, will conduct site visits to ensure compliance with the HMIS Privacy Policy and Procedures.

Each year, PAs will be required to self-certify that they comply with the FL-508 HMIS Privacy Policy and Procedure. PAs must indicate whether it has:

- Adopted the HMIS Privacy Policies and Procedures, or
- Adopted a different privacy policy that meets the requirements outlined in the HMIS Privacy Policies and Procedures.

In the event the PA adopts a different privacy policy, the PA will be expected to attach a copy of the policy to their HMIS Agency Participation Agreement. If no policy has been adopted at time of execution of the HMIS Agency Participation Agreement, or at the time of the annual certifications thereafter, the PA must establish a date no later than three months from the certification review date by which such a policy will be developed and implemented.

Privacy Policy Notice

The HMIS Lead Agency and PAs must ensure privacy policies are readily accessible to clients and the public.

Public Access Procedure

The HMIS Lead Agency will post the FL-508 HMIS Privacy Policies and Procedures on its official website and provide a copy to any individual upon request.

Informed Client Consent Procedure

The HMIS Lead Agency will maintain HMIS data using lawful and fair means. PA privacy policies will include a provision stating the PA will only collect data with the consent of their clients. Any client seeking assistance from a PA will be notified through signed and/or verbal consent that data collection will occur. The HMIS Lead Agency will assume that client information in HMIS has been entered with the consent of the client according to these policies and procedures. All PAs will keep copies of the signed consents on file, attaching the client's profile in HMIS is permissible. Individual PAs may maintain stricter policies relating to client consent to collect and share data with the HMIS Lead Agency.

At minimum, the HMIS Lead Agency requires PAs to post signs at each intake desk or other appropriate locations where data collection occurs explaining the reasons for HMIS data collection. The sign will include the following language:

We collect personal information about individuals in a computer system called a Homeless Management Information System (HMIS) for reasons that are discussed in our privacy policy. We may be required to collect some personal information by organizations that fund the operation of this program. Other personal information that we collect is important to run our programs, to improve services for individuals, and to better understand the needs of individuals. In order to provide or coordinate individual referrals, case management, housing or other services, some client records may be shared with other organizations that are required to have privacy policies in place in order to protect your personal information.

We only collect information that we consider appropriate. If you have any questions or would like to see our privacy policy, our staff will provide you with a copy. You have the right as a client to decline to share your information.

Accessibility Procedure

Each PA that is a recipient of federal assistance will provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the organization.

PAs must make reasonable accommodations for persons with disabilities throughout the consent, intake, and data collection processes. This may include, but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type as needed by the individual with a disability.

HMIS Data Use and Disclosure

The confidentiality of HMIS data will be protected. PAs must collect data by legal and fair means, consistent with the Data Policies and Procedures section of the HMIS Policies and Procedures. The

HMIS Lead Agency and PAs may only collect, use, and disclose data for the specific purposes and reasons defined in this section.

The HMIS Lead Agency collects HMIS data from organizations that directly enter data into the FL-508 HMIS System with the knowledge and authority of the CoC Steering Committee. HMIS data may only be collected, used, or disclosed for activities described in this section. The HMIS Lead Agency requires that PAs notify individuals seeking their assistance that data collection, use, and disclosure will occur. By entering data into the HMIS System, the PA verifies that individuals have provided the PA with consent to use and disclose their data for purposes described below and for other uses and disclosures the HMIS Lead Agency determines to be compatible:

- To provide or coordinate individual referrals, case management, housing, or other services. Client records may be shared with other organizations that may have separate privacy policies and that may allow different uses and disclosures of the information;
- For functions related to payment or reimbursement for services;
- To carry out administrative functions, including but not limited to audit, personnel oversight, and management functions;
- To produce aggregate-level reports regarding use of services;
- To produce aggregate-level reports for funders or grant applications;
- To create de-identified (anonymous) information;
- To track system-wide and project-level outcomes;
- To identify unfilled service needs and plan for the provision of new services;
- To conduct a study or research project approved by the CoC
- When required by law (to the extent that use or disclosure complies with and is limited to the requirements of the law);
- To avert a serious threat to health or safety if:
 - The use or disclosure is reasonably believed to be necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and
 - The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
- To report about an individual reasonably believed to be a victim of abuse, neglect, or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect, or domestic violence in any of the following three circumstances:
 - Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law; or If the individual agrees to the disclosure; or
 - To the extent that the disclosure is expressly authorized by statute or regulation and either of the following are applicable:
- The PA believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or
- If the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the HMIS data for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure;
 - When such a permitted disclosure about a victim of abuse, neglect, or domestic violence is made, the individual making the disclosure will promptly

inform the individual who is the victim that a disclosure has been or will be made, except if:

- In the exercise of professional judgment, it is believed that informing the individual would place the individual at risk of serious harm; or
 - It would be informing a personal representative (such as a family member or friend), and it is reasonably believed that the personal representative is responsible for the abuse, neglect, or other injury, and that informing the personal representative would not be in the best interests of the individual as determined in the exercise of professional judgment.
- To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
 - In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena;
 - If the law enforcement official makes a written request for HMIS data that:
 - Is signed by a supervisory official of the law enforcement agency seeking the HMIS data;
 - States that the information is relevant and material to a legitimate law enforcement investigation;
 - Identifies the HMIS data sought;
 - Is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and
 -
 - States that de-identified information could not be used to accomplish the purpose of the disclosure.
 - If it is believed in good faith that the HMIS data constitutes evidence of criminal conduct that occurred on the PA's premises;
 - In response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the HMIS data disclosed consists only of name, address, date of birth, place of birth, social security number and distinguishing physical characteristics; or
 - If the official is an authorized federal official seeking HMIS data for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others), and the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
 - To comply with government reporting obligations for HMIS and for oversight of compliance with HMIS requirements.
 - To third parties for the following purposes:
 - To permit other systems of care to conduct data matches (i.e., to determine if you are also utilizing services from such other systems of care); and
 - To permit third party research firms and/or evaluators to perform research and evaluation services, as approved by the CoC, relating to the projects administered by the HMIS Lead and the PAs; Provided that before client-level HMIS data are disclosed under this subsection, the third party that will receive such client-level

HMIS data and use it as permitted above must first execute a Data Use and Security Agreement. The Data Use and Security Agreements requires the third party to comply with all applicable laws and regulations, including the privacy standards and disclosure provisions contained in the current HUD HMIS Data and Technical Standards.

The HMIS Lead may share client level HMIS data with contracted entities as follows:

- The PA originally entering or uploading the data to the FL-508 HMIS.
- Outside organizations under contract with the HMIS Lead Agency or other entities acting on behalf of the FL-508 CoC for research, data matching, and evaluation purposes. The results of this analysis will always be reported in aggregate form; **client level data will not be publicly shared under any circumstance.**

Before any use or disclosure of Personal Identifying Information (PII) that is not described here is made, the HMIS Lead Agency or PA wishing to make the disclosure will seek the consent of all individuals whose PII may be used or disclosed.

Access and Correction

Clients whose data is collected in HMIS may inspect and receive a copy of their HMIS record by requesting it from the PA that originally collected the information. The HMIS Lead Agency requires the PA to establish a policy to manage such requests and to explain any information a client may not understand.

Each PA privacy policy will describe how requests from clients for correction of inaccurate or incomplete HMIS records are handled. The policy will allow clients to request their HMIS data or request the data be removed from the HMIS. Nothing in this section is intended to indicate that a PA is released from any obligation by any funder to collect required data elements.

In the event that a client requests to view his or her data in the HMIS, the PA HMIS Administrator will keep a record of such requests and any access granted. The PA HMIS Administrator or PA Case Manager will provide a copy of the requested data within a reasonable timeframe to the client.

PAs are permitted to establish reasons for denying client requests for inspection of HMIS records. These reasons are limited to the following:

- If the information was compiled in reasonable anticipation of litigation or comparable proceedings;
- If the record contains information about another client or individual (other than a healthcare provider or homeless provider) and the denial is limited to the section of the record containing such information;
- If the information was obtained under a promise of confidentiality (other than a promise from a healthcare provider or homeless provider) and if the disclosure would reveal the source of the information; or
- Disclosure of the information would be reasonably likely to endanger the life or physical safety of an individual.

If a PA denies a request for access or correction, the PA will explain the reason for the denial. The PA will also maintain documentation of the request and the reason for the denial.

PAs may reject repeated or harassing requests for access to or correction of an HMIS record.

Data Retrieval and Sharing

HMIS, as implemented in the Alachua/Bradford/Levy/Gilchrist/Putnam County regions, is a system that will generate reports required by HUD, the CoC, and other stakeholders. This will be at a level that does not identify individuals but can provide accurate statistical data such as numbers served and trend assessments based on data entered by PAs. Data from HMIS will be used to produce CoC and local level statistical reports as well as corresponding reports.

The HMIS Lead Agency staff has access to retrieve all data in the FL-508 HMIS. The HMIS Lead Agency will protect client confidentiality in all reporting.

PAs may share clients' personal information with each other for the purposes of determining eligibility and coordinating client services once an agreed upon Release of Information is in place, as outlined in the Data Policies and Procedures section of the Policies and Procedures.

PAs may also retrieve HMIS data entered to produce statistical reports including number of clients served and trend assessments for internal purposes, grant applications, and other required reports, within the parameters established by the HMIS Lead.

Grievance

Concerns related to the FL-508 HMIS Privacy Policy and Procedure may be raised according to the procedures outlined in the HMIS Client Grievance Policy and Procedure. PAs must establish a policy and regular process for receiving and reviewing complaints from clients about potential violations of the policy. PAs should report any violation of their privacy policy to the HMIS Lead Agency. In addition to any corrective actions taken by the PA, the HMIS Lead Agency may also report the findings to the CoC Steering Committee or law enforcement, as appropriate, for further action. Such action may include, but is not limited to the following:

- Suspension of system privileges
- Revocation of system privileges

Individuals sanctioned because of HMIS privacy violations, can appeal to the CoC Workgroup.

All HMIS end-users are required to comply with this privacy policy. PAs must ensure all end-users involved in HMIS data collection and/or entry receive privacy policy training. End-users must receive and acknowledge receipt of this privacy policy.



HMIS PRIVACY NOTICE

HOMELESS MANAGEMENT INFORMATION SYSTEM

Revised July 2020

THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

- The Homeless Management Information System (HMIS) for the North Central Florida Alliance is a computerized record-keeping system that captures information about people experiencing homelessness, including their service needs has decided to use the HMIS as its data management tool.
- Is a computerized record-keeping database and we collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law, or by organizations that give us money to operate our programs.
- Other personal information we collect is important to run our programs. It also helps us to better understand the needs of persons who are homeless and to improve services for them.
- Your participation in this program is voluntary. If you choose not to participate, that will in no way affect the services you receive.
- The HMIS is beneficial to you because you will not have to supply all your personal information again when you go to another agency for services. With your written consent, we can share your personal information with another collaborating agency.
- You can choose to share all or part of your personal information, including demographics, housing, employment, military, legal, service needs, goals, and outcomes.
- No medical, mental health or substance abuse history will be shared unless you provide express written consent.
- With your written consent, your information will be shared electronically via a secure, encrypted, web-based system with the agencies of your choice.
- The information you share with another agency will be used to access services for you. Your written consent to share information is effective for the period of time designated.
- You can choose to have any information you have shared deleted from the system at any time. You can also ask to see a document which lists the persons who have viewed or updated your client record.
- You can have any written consent revoked at any time
- For the purposes of reporting requirements and advocacy, your information will be used without revealing your name or other information which would identify you.
- All agencies using HMIS are required to have security procedures in place regarding the protection and sharing of client data.