



**Rochester/
Monroe County
Continuum of Care
(RMCCoC)**

**Homeless Management
Information System
(HMIS)**

Policy and Procedure Manual

RMCCoC Ratified

1/8/13 Revised 11/5/2014

This manual covers the operating policies and procedures, Data Quality Plan, Privacy Plan, and Security Plan for the RMCCoC, the HMIS Lead Agency, and HMIS User Agencies.

1. HMIS Participation Policy

The United States Department of Housing and Urban Development (HUD) requires all grantees and sub-grantees to participate in their local Homeless Management Information System (HMIS). This policy is consistent with the Congressional Direction for communities to provide data to HUD on the extent and nature of homelessness and the effectiveness of its service delivery system in preventing and ending homelessness. The HMIS and its operating policies and procedures are structured to comply with the most recently released HUD Data and Technical Standards for HMIS. Recognizing that the Health Insurance Portability and Accountability Act (HIPAA) and other Federal, State and local laws may further regulate agencies, the RMCCoC may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable laws.

2. Participation Requirements

2 (a) Mandated Participation;

All designated agencies that are funded to provide homeless services by the State of New York (NY) and/or HUD in the State of NY must meet the minimum HMIS participation standards as defined by this Policy and Procedures manual. These designated programs include: emergency and transitional shelters, permanent housing programs, homelessness prevention, outreach, supportive services, and Rapid Re-housing programs. These participating agencies will be required to comply with all applicable operating procedures and must agree to execute and comply with an HMIS Agency Participation Agreement.

2 (b) Voluntary Participation;

Although non-funded agencies are only required to meet minimum participation standards, RMCCoC HMIS strongly encourages non-funded agencies to fully participate with all of their homeless programs.

While the CoC cannot require non-funded providers to participate in the HMIS, the CoC works closely with non-funded agencies to articulate the benefits of the HMIS and to strongly encourage their participation in order to achieve a comprehensive and accurate understanding of homelessness in the State of NY.

3. Minimum Participation Standards

- Collect all universal data elements, as defined by HUD, for all programs operated by the agency that primarily serve persons who are homeless, formerly homeless, or at risk of becoming homeless,
- For all programs, enter federally required client-level data into the HMIS.
- For all programs funded by NY Dept of Health and Human Services, or HUD, enter federally required AND state required client level data.
- Complete data entry within specific time frames, depending on the type or program. (see section HMIS Data Quality Policies and Procedures.
- Comply with all HUD regulations for HMIS participation.

The RMCCoC-HMIS uses all submitted data for analytic and administrative purposes, including the preparation of RMCCoC HMIS reports to funders and the Continuum's participation in the Federal Annual Homeless Assessment Report (AHAR).

4. HMIS Agency Participation Requirements

- Authorized agency users directly enter client-level data into (the HMIS database. Users have rights to access data for clients served by their agency and use HMIS functionality based on their user level privileges. The agency's data is stored in the HMIS central database server, which is protected by several levels of security to prevent access from unauthorized users.
- Each agency shall designate at least one Agency Administrator who is the agency's point person/specialist regarding HMIS. The Agency Administrator is responsible for:
 1. Providing and maintaining agency specific information in the Service Point Provider Profile.
 2. Organizing its agency's users by resetting passwords and updating user information, i.e. user names, addresses, email addresses and contact phone number.
 3. Making sure proper training has taken place for the users and that all HMIS policies are being followed by all users from that agency; AND checking that all agency data is accurate.
 4. Notifying the HMIS lead agency of any staff turnover within 48 hours of an employee with HMIS access ending employment with the participating agency.

5. Hardware, Connectivity and Computer Security Requirements

5 (a) Workstation Specification

The minimum desktop specification for Service Point are:

- Computer – PC works best or Mac (will work in conjunction with Java)
- Monitor
- Internet connection - broadband
- Browser – i.e. Google, Explorer

Internet Connectivity

Participating Program must have internet connectivity for each workstation accessing the HMIS. To optimize performance, all agencies are encouraged to secure a high speed internet connection.

Security Hardware/Software

All workstations accessing the HMIS need to be protected by a Firewall. If the workstations are part of an agency computer network, the Firewall may be installed at a point between the network and the internet or other systems rather than at each workstation. Each workstation also needs to have anti-virus and anti-spyware programs in use and properly maintained with automatic installation of all critical software updates i.e. McAfee and Symantec (Norton) Security systems.

Agency Workstation Access Control

Access to the HMIS will be allowed only from computers specifically identified by the Participating Agency's Executive Director or authorized designee and HMIS Agency Administrator. Laptop computers will require an additional security statement indicating that they will not be used for unauthorized purposes from unauthorized locations.

6. HMIS User Implementation

6. (a) Eligible Users

Each Participating Agency shall authorize use of the HMIS only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out participating agency responsibilities.

All Agency Administrators and End Users will be trained by HMIS System Administrators with program specific training by Agency Administrators.

The HMIS System Administrator shall authorize use of the HMIS only to users who need access to the system for technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out their responsibilities.

6. (b) User Requirements

Prior to being granted a user name and password, users must sign an HMIS Users Policy, Responsibility Statement and Code of Ethics form. This form reinforces that Users must be aware of the sensitivity of client-level data and must take appropriate measures to prevent its unauthorized disclosure. Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with all policies and standards described within this Policies and Procedures Manual. They are accountable for their actions and for any actions undertaken with their username and password.

Agency Administrators must ensure their users have received adequate training prior to being given access to the database.

6. (c) Setting Up a New HMIS User

User licenses are provided to the agency as determined by the RMCCoC. If the Participating Program wishes to have additional licenses, they will be available for an additional cost to that program via an invoice processed by Rochester Housing Authority.

If the Provider Agency wants to authorize system use for a new user, the agency's Executive Director or Agency Administrator must :

- Determine the access level of the proposed HMIS user: and
- Complete a User License indicating the new user information. Once the form is completed and returned to the HMIS System Administrator the new user profile is created.

Once the user ID is established, the Agency Administrator is responsible for maintaining the user account. If any user leaves the agency or no longer needs access to the HMIS, the Agency Administrator is responsible for immediately terminating user access by notifying the HMIS System Administrator.

Volunteers and Contractors have the same user requirements as paid staff. They must have an individual user account, go through the same training, and have the same confidentiality and privacy documents signed and on file with the agency they are serving.

The Executive Director or authorized designee is responsible for ensuring that all agency users understands and complies with all applicable HMIS policies and procedures.

6. (d) Enforcement Mechanisms

The HMIS Sponsor will investigate all potential violations of any security protocols. Any user found to be in violation of security protocols will be sanctioned.

Sanctions may include, but are not limited to:

- A formal notice of non-compliance from the CoC Coordinator or Chair;
- Suspension of system privileges; and
- Revocation of system privileges.

A Participating Agency's access may be suspended or revoked at anytime without notice if serious or repeated violation(s) of HMIS Policies and Procedures occur by agency users.

7. HMIS Agency Implementation (See also section Data Quality, Training)

Prior to setting up a new Participating Agency (Provider) within the HMIS database, the HMIS System Administrator shall:

- Verify that the required documentation has been correctly executed and submitted, including:
 - HMIS Agency / Site Profile
 - Agency Participation Agreement;
 - Additional Documentation on Agency and Program(s):
 - Designation of Agency Administrator; and
 - License Fee, if applicable.
- Request and receive approval from the HMIS Sponsor Agency (level 2 provider) to set up a new agency;
- Work with the Agency Administrator to input applicable agency and program information; and
- Work with the HMIS Sponsor to migrate legacy data, if applicable. and within the scope of normal HMIS functions. Data needing additional HMIS or third party vendor intervention will be addressed on a case by case basis.

7. (a) Agency Information Security Protocol Requirements

At a minimum, Participating Agencies must develop rules, protocols or procedures to address the following:

- Internal agency procedures for complying with the HMIS confidentiality requirements and provisions of other HMIS client and agency agreements;
- Posting a sign in the areas of client intake that explains generally the reasons for collecting personal information;
- Appropriate assignment of user accounts;
- Preventing user account sharing;
- Protection of unattended workstations
- Protection of physical access to workstations where employees are accessing HMIS;
- Safe storage and protected access to hardcopy and digitally generated client records and reports with identifiable client information;
- Proper cleansing of equipment prior to transfer or disposal; and
- Procedures for regularly auditing compliance with the agency's information security protocol.

7. (b) User Access Levels:

All HMIS users must be assigned a designated user access level that controls the level and type of access the user will have within the system. Each user will have access to client level data only that is collected by their own agency.

8. HMIS Client Data Policies and Procedures

8. (a) Client Notification Policies and Procedures

The HMIS has prepared standard documents for HMIS Confidentiality Requirements and Client Acknowledgement Form. All written consent forms must be stored in a client's case management file for record keeping and auditing purposes. Forms are located in the HMIS agency/site profile packet. Contact your HMIS System Administrator for copies.

8. (b) Open Systems Designated Groups of Common Programs that Share HMIS Data

This section will be added as more guidance becomes available from HUD.

8. (c) Definitions and Descriptions of Client Notification and Consent Procedures

8 (c) (1) Client Notice

A written notice of the assumed functions of the HMIS must be posted and/or given to each client so that he/she is aware of the potential use of his/her information and where it is stored. The client has a right to view a copy of his/her record upon request.

8 (c) (2) Applicability of Consents

The Participating Agency shall uphold Federal and State Confidentiality regulations to protect client records and privacy. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

8. (d) Accountability for HMIS Policy

Participating Agencies must establish a regular process of training users on the HMIS policies and procedures outlined in this manual regularly auditing that the policy is being followed by agency staff (including employees, volunteers, affiliates, contractors and associates), and receiving and reviewing complaints about potential violations of the policy.

9. HMIS Data Quality Policies and Procedures

9. (a) Data Quality Standard

- All names provided will be accurate
- All services provided will be compatible with providing program
- Data entry must be complete within the timelines specified in section 9 (b) Data Entry Standards by Type of Program.

9 (a) (1) Responsibility

The RMCCoC is responsible for implementing these data standards in such a way that:

- Specifies the data quality standard to be used by all participating agencies;
- Provides a mechanism for monitoring adherence to the standard;
- Provides the necessary tools and training to ensure compliance with the standard; and
- Includes strategies for working with agencies that are not in compliance with the standard.

9 (a) (2) RMCCoC Data Quality Benchmarks

The RMCCoC requires each program maintain the following minimum data quality benchmarks:

- the percentage of missing or unknown/refused universal data elements should be no higher than 2%, and
- program specific data elements no higher than 5%.

9. (b) Data Entry Standards by Type of Program

9 (b) (1) Emergency Shelters

All Emergency Shelters are required to be licensed to provide client level data into HMIS. Programs shall utilize the entry/exit process for every client entered into HMIS. Minimum data elements required by HUD, including entry/exit dates, must be entered within fourteen days of an individual's entry into the program.

9 (b) (2) Non-emergency shelters, Shelter Plus Care, Transitional Housing Programs, Permanent Supportive Housing and other Rental Assistance Programs

All programs in this program type are required to be licensed to provide client level data into HMIS. Minimum data elements required by HUD, including entry/exit dates, must be entered within fourteen days of an individual's entry into the program.

9 (b) (3) Homelessness Prevention, Supportive Services, Outreach, and Rapid Re-Housing Programs

All required data will be entered into HMIS within seven business days of a person's entry into services.

9. (c) Data Quality Monitoring

The HMIS System Administrator will perform regular data integrity checks on the HMIS data, which will include the following steps:

- Run HUD required data elements, data incongruities, and other data quality reports as determined by HMIS staff and the CoC;
- Notify Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Agency Administrators if necessary;
- Notify Agency Executive Director if agency administrators are not responsive to required corrective actions; and
- Notify the CoC Coordinator/Chair regarding any uncorrected data quality issues.

9. (d) Accountability for Data Quality

- Any patterns of error at a Participating Agency will be reported to the Agency Administrator through electronic mail.
- Participating Agencies are expected to correct data errors within thirty (30) days of notification.
- When patterns of error have been discovered, users will be required to correct data entry techniques and will be monitored for compliance.

10. Data Collection Requirements

10. (a) HUD Required Data Elements

A Participating Agency is responsible for ensuring that a minimum set of data elements, referred to as the HUD Required Data Elements (RDEs) as defined by the HUD Data and Technical Standards, will be collected and/or verified from all clients at their initial program enrollment or as soon as possible thereafter. Participating Agencies are required to enter data into the HMIS system as specified in section HMIS Data Quality Policies and Procedures.

The RDEs are all included collectively on the Client Profile, Assessment, and HUD Entry and Exit assessments, which are on the ServicePoint Entry and Exit screens, respectively.

Participating Agencies must report client-level RDEs using the required response categories detailed in the "Required Response Categories for HUD Required Data Elements" section of the HUD Data and Technical Standards.

10. (b) Program-Specific Data Elements

All Participating Agencies are also responsible for ensuring that the Program-Specific Data Elements, as defined by the HUD Data and Technical Standards, are collected from all clients that are served by applicable HUD funded programs. These Program-specific Data Elements must be entered into the HMIS as specified in section 9. HMIS Data Quality Policies and Procedures.

Participating Agencies must provide client-level data for the Program-specific Data Elements using the required response categories detailed in the "Required Response Categories for Program-specific Data Elements" section of the HUD Data and Technical Standards. These standards are already incorporated into the HMIS.

The Program-specific Data Elements are located in the HUD Entry and Exit assessments, which are on the Service Point Entry and Exit screens, respectively.

11. Data Qualify Training

11. (a) Requirements

11 (a) (1) End-User Training

Each end user of the HMIS system must complete at least one session of training with the HMIS system administrators upon completion of their user access forms and approval of their provider agency. It is preferred they receive more training from their Agency Administrator in order to understand Agency Specific requirements, such as additional assessment information. Agency Administrators will promptly notify the HMIS System Administrator when they have specific training needs.

11 (a) (2) Agency Administrator

Each new Agency Administrator must complete an initial training session after completing End-User training. This session will include how to configure and manage an Agency's programs and users in the HMIS. Agency Administrators will participate in subsequent training sessions as designated by the HMIS System Administrator.

11 (a) (3) Reports Training

Reports training for Agency Administrators and other interested users will be made available as needed. These will include training on how to use existing canned reports in Service Point's Report Writer and may include opportunities for training on ART Advanced Reporting Tool (this may include Viewer licenses or ad-hoc licenses).

HMIS staff encourages Provider Agencies to run their own data quality reports so that Provider Agencies can monitor their own data quality and become more effective in serving our clients across the Continuum.

12. HMIS Data Access Control Policies

12. (a) User Accounts

Agency Administrators are responsible for managing user accounts for their Agency. They must follow the procedures documented in the HMIS User Implementation section for user account set-up including verification of eligibility, the appropriate training, and the establishment of appropriate user type. The assigned user type will determine each user's individual access level to data, and Agency Administrators must regularly review user access privileges.

The Agency Administrator should discontinue the rights of a user immediately upon that user's termination from any position with access to HMIS. It is then their responsibility to notify the HMIS System Administrator to remove users from the system and free up the license those users are holding.

12 (a) (1) User Passwords

Each user will be assigned a unique identification code (User ID), preferably the first initial and last name of the user.

A temporary password will be automatically generated by the system when a new user is created. The HMIS System Administrator will communicate the system-generated password to the user. The user will be required to establish a new password upon their initial login. This password will need to be changed every 45 days. A password cannot be used again until another password has expired. Passwords should be between 8 and 16 characters long, contain at least two numbers, and should not be easily guessed or found in a dictionary. The password format is alphanumeric and is case-sensitive. Users are prohibited from sharing passwords, even with supervisors.

12 (a) (2) Password Reset

Except when prompted by Service Point to change an expired password, users cannot reset their own password. The Agency Administrator and the HMIS System Administrator have the ability to temporarily reset a password. If an Agency Administrator needs to have his/her password reset, the HMIS System Administrator will need to reset that password.

12 (a) (3) System Inactivity

Users must logoff from the HMIS application and their workstation if they leave the workstation. Also, HUD requires password-protected screen-savers on each workstation. If the user is logged onto a workstation and the period of inactivity on that workstation exceeds 30 minutes, the user will be logged off the system automatically.

12 (a) (4) Unsuccessful Login

If a user unsuccessfully attempts to log in 3 times, the User ID will be "locked out. Their access permission will be revoked and they will be unable to regain access until their User ID is reactivated by the Agency Administrator or HMIS System Administrator.

12. (b) HMIS Data Ownership Policies

The client has the right to view and have corrections made on their own data. In the event that the relationship between the HMIS Lead Agency and a Provider Agency is terminated, the Provider Agency access is terminated. If another program is assuming the program administration then the data migrates to the new program (fees may apply).

12. (c) HMIS Data Use and Disclosure Policies and Procedures

Each of the HMIS Provider Programs must comply with uses and disclosures standard, as outlined in the 2014 HMIS Data Standards Manual. See <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

12. (d) HMIS Data Release Policies and Procedures

12 (d) (1) Data Release Criteria

HMIS client data will be released only in aggregate, for any purpose beyond those specified in the HMIS Data Uses and Disclosures Policies and Procedures section according to the criteria specified below.

12 (d) (2) Aggregate Data Release Criteria

All data must be anonymous, either by removal of all identifiers and/or all information that could be used to infer an individual or household identity.

13. HMIS Technical Support Policies and Procedures

13. (a) HMIS Application Support

As unanticipated technical support questions on the use of the HMIS application arise, users will follow this procedure to resolve those questions:

During the normal business hours of the HMIS:

- If a question arises regarding input or regulation, direct the support question to the Agency Administrator; and
- If the question is still unresolved, the Agency Administrator/user can direct the question to the HMIS System Administrator.

After the normal business hours of the HMIS:

- If the question can wait to be addressed during the following business day, wait and follow the normal business hours procedure outlined above; and
- If the question cannot wait, direct the technical support question to the Agency Administrator, if available.

13. (b) HMIS System Availability Policies

There are times that Service Point is unavailable because Bowman Systems is performing necessary backup and maintenance of the HMIS database. These are usually in the late evenings when as few people as possible need access to the system. However, when the HMIS Sponsor Agency receives notice of a planned interruption of service for other reasons or for an abnormal amount of time, the HMIS Sponsor Agency will notify Agency Administrators via email. If there is an unplanned interruption to service, the HMIS System Administrator will communicate with Bowman Systems, and Agency Administrators will be notified of any information regarding the interruption as it is made available.

If you have any questions about any HMIS related policies and procedures, contact the HMIS System Administrator.

14. Glossary of Terms

This section defines terms commonly used throughout the Manual.

Annual Homeless Assessment Report (AHAR): HUD's annual report to Congress on the nature and extent of homelessness nationwide.

Annual Performance Report (APR): A reporting tool that HUD uses to track program progress and accomplishments of HUD homeless assistance on an annual basis. Formerly known as the Annual Progress Report.

Client: A living individual about whom a Contributory HMIS Organization (CHO) collects or maintains protected personal information: (1) because 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.

Continuum of Care (CoC): The primary decision making entity defined in the funding application to HUD as the official body representing a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency.

CoC Program: A program identified by the CoC as part of its service system, whose primary purpose is to meet the specific needs of people who are experiencing a housing crisis. Continuum of Care Programs may include:

Homeless Assistance Program: A program whose primary purpose is to meet the specific needs of people who are literally homeless (as defined by HUD). Homeless assistance programs include outreach, emergency shelter, transitional housing, rapid re-housing, permanent housing and permanent supportive housing.

Homelessness Prevention Program: A program whose primary purpose is to meet the specific needs of people who are imminently losing their housing or at risk of losing their housing (as defined by HUD.) Homelessness prevention programs include those funded by STEHP and other homelessness prevention programs identified by the CoC as part of its service system.

Contributory CoC Program: A homeless assistance program or homelessness prevention program that contributes Protected Personal Information (PPI) or other client level data to an HMIS.

Contributory Non-CoC Program: A program that is neither a homeless assistance program nor a homelessness prevention program that contributes PPI or other client-level data to an HMIS.

Contributory HMIS Organization (CHO): An organization that operates a contributory homeless assistance program or homelessness prevention program or contributory non-homeless assistance program.

Data Recipient: A person who obtains PPI from an HMIS Lead Agency or from a CHO for research or other purposes not directly related to the operation of the HMIS, CoC, HMIS Lead Agency, or CHO.

End User (or User) : An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data in the HMIS or another administrative database from which data are periodically uploaded to the HMIS.

Homeless Management Information System (HMIS): The information system designated by a CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

HMIS Lead Agency: An organization designated by a CoC to operate the CoC's HMIS on its behalf.

HMIS Participating Bed: For any residential homeless program, a bed is considered a "participating HMIS bed" if the program makes a reasonable effort to record all universal data elements on all clients served in that bed and discloses that information through agreed upon means to the HMIS Lead Agency at least once annually.

HMIS Software Solution Provider: An organization that sells, licenses, donates, builds or otherwise supplies the HMIS user interface, application functionality and database.

HMIS User Agencies: See Participating CoC Program

HMIS Vendor: A contractor who is paid to provide services for the operation of a CoC's HMIS. An HMIS vendor includes an HMIS software solution provider, web server host, and data warehouse provider, as well as a provider of other contracted information technology or support.

Non-Contributory CoC Program: A CoC Program that does not contribute PPI or other client-level data to an HMIS.

Participating CoC Program: A Contributory CoC Program that makes reasonable efforts to record all the universal data elements and all other required data elements as determined by HUD funding requirements on all clients served and discloses these data elements through agreed upon means to the HMIS Lead Agency.

Protected Personal Information (PPI): Information about a client: (1) whose identity is apparent from the information or can reasonably be ascertained from the information; or (2) whose identity can, taking into account any methods reasonably likely to be used, be learned by linking the information with other available information or by otherwise manipulating the information.

Processing: An operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the PPI.

RMCCoC: The Rochester/Irondequoit/Greece/Monroe County Continuum of Care, NY-500

Unduplicated Accounting of Homelessness: An unduplicated accounting of homelessness includes measuring the extent and nature of homelessness (including an unduplicated count of homeless persons), utilization of homelessness programs over time, and the effectiveness of homelessness programs.

Unduplicated Count of Homeless Persons: An enumeration of homeless persons where each person is counted only once during a defined period of time.

Victim Service Provider: A nonprofit or nongovernmental organization including rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

15. APPENDIX A - List of Data Elements

Participating Agencies must report client-level detail in the "Required Response Categories for HUD Required Data Elements" section of the HMIS Data Standards. These standards are already incorporated into the HMIS software. Additional guidance can be accessed via:

<https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

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