

**Partners Ending Homelessness  
(PEH)**

**Homeless Management  
Information System  
(HMIS)**

**Policy and Procedures Manual**

**Ratified by the PEH-CoC Board of Directors  
February 8<sup>th</sup>, 2022**

This manual covers the operating policies and procedures, Data Quality Plan, Privacy Plan, and Security Plan for Partners Ending Homelessness (PEH), 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 along with other Federal, State and local laws may further regulate agencies. PEH may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so that 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 HUD and/or the State of NY must meet the minimum HMIS participation standards as defined by this Policy and Procedures manual. These designated programs include Emergency Shelters, Transitional Housing, Permanent Housing, Permanent Supportive Housing, Homelessness Prevention, Street Outreach, Supportive Services Only, 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, PEH 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 HMIS and strongly encourage their participation to achieve a comprehensive and accurate understanding of homelessness in Monroe County.

## **3. Minimum Participation Standards**

- Collect all universal data elements, as defined by HUD, for all programs operated by an agency that primarily serves 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 HUD or New York State, enter federally required AND state required client level data.
- Complete data entry within specific time frames, depending on the type or program. (see section 9, HMIS Data Quality Policies and Procedures).

- Comply with all HUD regulations for HMIS participation.

PEH uses all submitted data for analytic and administrative purposes, including the preparation of HMIS reports to HUD, for funders and for 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 name, addresses, email addresses and phone numbers.
  3. Making sure proper training has taken place for the users, that all HMIS policies and procedures are being followed by all users from that agency; AND checking that agency data is accurate. This is accomplished by using the Data Quality Framework, ESG CAPER or COC-APR, or the ART 0252 Data Completeness Report Card.
  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
- Monitor
- Internet connection - broadband
- Browser – i.e., Google, Microsoft Edge

##### **Internet Connectivity**

Participating Program must have internet connectivity for each workstation that accesses HMIS. To optimize performance, all agencies are encouraged to secure a highspeed internet connection.

##### **Security Hardware/Software**

All workstations accessing 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 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 further program specific training by Agency Administrators or others within the agency who are approved by the Agency Administrator as having sufficient knowledge to train users on program specific data entry procedures.

The HMIS System Administrator shall authorize the use of 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 username 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 HMIS 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 adequate understanding of the training for their program prior to being given access to their programs database /files on their own, ensuring that after HMIS training they have the understanding and knowledge needed for their organizations to input data correctly. They will also complete the HMIS Training Modules on The PEH Learning Center (TLC) site that is overseen by Compliance & Internal Capacity Building at PEH

If a user does not log into HMIS at least once a month, their User License may be revoked due to inactivity.

## 6 (c) Setting Up a New HMIS User

User licenses are provided to the agency as determined by PEH.

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 the User License Request form and have the new user sign this form, as well as the User Policy/Code of Ethics form. These forms must also be signed by the Agency Administrator. Completed and signed forms should be sent to the HMIS System Administrator. A new user profile will be created in HMIS only after these forms have been received and approved by the HMIS System Administrator. The HMIS User License form and User Policy/Code of Ethics can be found on the PEH website (<https://letsendhomelessness.org/about/hmis/>).

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 understand and comply with all applicable HMIS policies and procedures.

## 6 (d) Enforcement Mechanisms

The HMIS System Administrator 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 PEH Executive Director.
- Suspension of system privileges; and
- Revocation of system privileges.

A Participating Agency's access may be suspended or revoked at any time 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, meaning they can only enter data for their agency but may view other agencies information within allowable visibility.

## **8. HMIS Client Data Policies and Procedures**

### **8 (a) Client Notification Policies and Procedures**

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 in the HMIS agency/site profile packet. Contact your HMIS System Administrator for copies.

## **8 (b) Open Data Sharing**

All demographic data such as Client name, Social Security Number, Date of Birth, Gender, Race, Ethnicity, and Veteran status is shared system wide. Also, to comply with HUD's Coordinated Entry mandate, the HMIS system will be open to all agencies, unless the project serves unaccompanied minors, requires lawyer/client confidentiality or healthcare provider/patient confidentiality. Otherwise, the following will be open for all agencies: assessments, entry/exit information, need/service/referral, VI-SPDAT surveys, and Coordinated Entry applications.

## **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**

#### HMIS Data Standards

HMIS Data Standards have been established by the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Health and Human Services (HHS), and the U.S. Department of Veteran Affairs (VA) to allow for standardized data collection on homeless individuals and families across systems. The HMIS Data Standards identify Universal Data Elements, Program Specific Data Elements, and Project Descriptor Elements which are required data entry fields for all homeless projects participating in HMIS.

#### Universal Data Elements

The Universal Data Elements (UDEs) establish the baseline data collection requirements for all homeless housing and/or service providers entering data into HMIS. They are the basis for producing unduplicated estimates of the number of homeless people accessing services from homeless assistance providers, basic

demographic characteristics of people who are homeless, and patterns of service use, including information on shelter stays and homelessness episodes over time.

The required UDEs include the following:

Name	Length of Stay in Previous Place
Social Security Number	Destination (Exit)
Date of Birth	Relationship to Head of Household
Race	Client Location
Ethnicity	Project Entry Date
Gender	Project Exit Date
Veteran Status	
Disabling Condition Y/N	

Residence Prior to Project Entry

#### Program Specific Data Elements

Program Specific Data Elements provide information about the characteristics of clients, the services that are provided, and client outcomes. Many of these represent information that may change over time. Most will be captured at project entry and exit, and a few will also be captured at update or on an annual basis.

The required Program Specific Data Elements include the following:

Income Received Y/N, Sources and Amounts

Non-Cash Benefits Received Y/N and Sources

Covered by Health Insurance Y/N and Types

Disability Type

Domestic Violence

Current Living Situation and Date of Engagement (Street Outreach only)

Housing Move-In Date (Rapid Rehousing and Permanent Housing only)

Housing Assessment at Exit (Homelessness Prevention only)

#### Annual Assessment

In addition, data collection must include an annual assessment for all persons in the project one year or more.

#### CoC data elements

The CoC may add other data elements that may also be required to be collected.

## **9 (a)(1) Responsibility**

PEH 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) PEH Data Quality Benchmarks**

The goal of PEH is to collect 100% of all data elements (Universal and Program Specific).

## **9 (b) Data Entry Timeline by Project Type**

**9(b)(1) Emergency Shelters (ES), Safe Havens (SH), and Street Outreach (SO):** All Entry/Exit Dates, Universal Data Elements, Additional Data Elements, and HUD Verifications must be entered within a maximum of three (3) days from intake and/or exit. We are striving for real time data entry or at least within 24 hours.

**9(b)(2) Transitional Housing (TH), Permanent Housing (PH), Permanent Supportive Housing (PSH), Homelessness Prevention (HP), Rapid Re-Housing (RRH), and Support Services Only (SSO):** All Entry/Exit Dates, Universal Data Elements, Additional Data Elements, and HUD Verifications must be entered within a maximum of three (3) days from intake and/or exit. We are striving for real time data entry or at least within 24 hours.

## **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 Universal Data Elements and Program Specific Data Elements, data incongruities, and other data quality reports as determined by HMIS staff and the CoC;
- Notify Agency Administrators of findings and timelines for correction.
- Re-run reports for errant agencies/projects, 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 PEH Executive Director 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 five (5) business days of notification.

- When patterns of error have been discovered, the user license may be suspended until user attends a mandatory refresher training with HMIS Staff.

## **10. Data Collection Requirements**

### **10 (a) Universal Data Elements**

A Participating Agency is responsible for ensuring that the Universal Data Elements (UDEs), as defined by the most recent HMIS Data Standards Manual, will be collected and/or verified from all clients at their initial program enrollment or as soon as possible thereafter. This data is required to be entered in the HMIS system as specified in Section 9, HMIS Data Quality Policies and Procedures.

The UDEs are all included collectively in the Client Profile, Client Demographics, and HUD Entry, Exit and Update assessments.

Participating Agencies must report client-level UDEs using the required response categories detailed in the most recent HMIS Data Standards Manual.

### **10 (b) Program Specific Data Elements**

All Participating Agencies are also responsible for ensuring that the Program Specific Data Elements, as defined by the most recent HMIS Data Standards Manual, are collected from all clients that are served by applicable HUD funded programs. This data is required to be entered in the HMIS system as specified in Section 9, HMIS Data Quality Policies and Procedures.

The Program Specific Data Elements are in the HUD Entry, Exit, and Update assessments. Some examples include Date of Engagement for Street Outreach programs, Housing Move-In Dates for PSH and RRH, Homelessness Prevention Program exit questions, and RHY specific assessments for the RHY programs. This would include any future Data Elements that may arise.

Participating Agencies must report client-level Program Specific Data Elements using the required response categories detailed in the most recent HMIS Data Standards Manual.

## **11. Data Quality 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. They will receive more training from their [Agency Lead](#) 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. Programs that receive HUD CoC funding must have their users attend mandatory annual training with HMIS Staff.

## **11 (a) (2) Reports Training**

Reports training for Agency Administrators and other interested users will be made available as needed. This will include training on how to use existing canned reports on the Report Dashboard, Report Writer and ART (Advanced Reporting Tool).

Provider Agencies should run their own data quality and performance 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**

#### **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 when a new user is created. HMIS Staff will communicate the temporary password to the user and then 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 a special character 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. Users who never sign on or who have not signed on for 60 days may lose their HMIS license.

#### **12 (a) (2) Password Reset**

Except when prompted by ServicePoint to change an expired password, users can reset their own password. On occasion, the reset password email from ServicePoint gets blocked as spam. Users should check their Junk Mail folder for the email. In instances where the email is not received, the Agency Administrator and the HMIS System Administrators can 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. 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. If 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 standards, as outlined in the latest 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 in aggregate only, for any purpose beyond those specified in the HMIS Data Uses and Disclosures Policies and Procedures section per 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 WellSky is performing necessary backup and maintenance of the HMIS database. This usually happens 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 WellSky, 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.

**PEH:** Partners Ending Homelessness

**Agency Leads:** The person within the agency who is tasked with making sure the users is trained and proficient with using HMIS as it pertains to their agency's programs and procedures.

**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) 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.

**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 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, considering 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 by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the PPI.

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

**TCL-**The Learning Center, a computer-based training program overseen by the Compliance & Internal Capacity Building at PEH

**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.

**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.