



Homeless Management Information System (HMIS-Erie)

Policies and Procedures Manual

September, 2017

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HOMELESSNESS MANAGEMENT INFORMATION SYSTEM

POLICIES AND PROCEDURES MANUAL

*This manual is developed by HMIS-Erie Management and authorized by the Erie County
Department of Human Services Housing Team*

HMIS-ERIE GOVERNANCE CHARTER

INTRODUCTION

Erie County Department of Human Services (ECDHS) is the lead agency and Collaborative Applicant for the Erie County Continuum of Care (PA-605) as well as the designated lead agency for the PA-605 Homeless Management Information System (HMIS-Erie). The coverage area includes all of Erie County, PA. ECDHS has primary responsibility for all HMIS-ERIE activities.

HMIS-Erie Governance Charter serves to delineate the roles and responsibilities related to key aspects of the governance and operations of HMIS-Erie and includes the most recent **HMIS-ERIE Policies and Procedures Manual (Policy)** approved and adopted by the ECDHS, which is incorporated into this charter by reference. The Policy includes privacy, security, client consent and data entry requirements and may be modified from time to time at the ECDHS' discretion.

Beginning with the 2003 Continuum of Care (CoC) grants and continuing with the Emergency Solutions Grants (ESG), 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. 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.

HMIS-Erie 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 Continuum may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they follow applicable laws.

The ECDHS uses all submitted data for analytic and administrative purposes, including the preparation of ECDHS reports to funders and the Continuum's participation in the Federal Annual Homeless Assessment Report (AHAR). Aggregate data taken from HMIS-Erie is used to inform Strategic Planning activities and the Consolidated Plans of Erie City and County and other entitlement communities.

KEY SUPPORT ROLES & RESPONSIBILITIES

Erie County Department of Human Services Housing Team

As lead agency for the Erie City and County Continuum of Care (CoC):

- Manages HMIS-Erie System Administrators, oversees HMIS-Erie project and has primary responsibility for all HMIS-ERIE activities
- Approves and facilitates enforcement of HMIS-ERIE policies as set forth in HMIS-Erie Policies and Procedures Manual
- Designates software to be used for HMIS-Erie in the geographic region
- Selects, approves and executes annual contract(s) with HMIS-ERIE vendor(s)

HMIS-ERIE Management Team

- Guides the implementation/maintenance of the Homeless Management Information System
- Ensures HMIS-ERIE compliance with all HUD rules and regulations
- Encourages and facilitates participation
- Develops, informs, and reviews HMIS-ERIE policies and procedures
- Advises and recommends to the ECDHS Housing Team changes to HMIS-ERIE policies and procedures
- Cultivates ways in which future data measurement can contribute to fulfillment of strategic goals
- Provides training and support to partner agency users
- Facilitates continuing quality improvement via data analyses and knowledge of best practices
- Ensures compliance with HMIS-ERIE policies and HUD requirements
- Monitors data quality in accordance with Data Quality Plan benchmarks as set forth in HMIS-Erie Policies and Procedures Manual
- Acts as liaison between the ECDHS and regional or national HMIS-ERIE related organizations and participates in related activities
- Supervises contract(s) with vendor(s)

HMIS-ERIE Partner Agencies

- Execute an HMIS-ERIE Agency Partner Agreement and, if applicable, a Network Data Sharing Agreement
- Agree to abide by the most current HMIS-ERIE Policy and Procedures Manual (Policy) approved and adopted by the ECDHS

- Ensure that all employees and agents comply with the Policy
- Ensure staffing and equipment necessary to implement and ensure HMIS-ERIE participation

HMIS-ERIE Agency Administrators

- Are the main communicators and the liaison between HMIS-Erie Management Team and their respective agency's users
- Ensure compliance with HMIS-ERIE policies within their agency
- Provide support for HMIS-ERIE use within their agencies
-

HMIS-ERIE AGENCY IMPLEMENTATION POLICIES AND PROCEDURES

HMIS-ERIE PARTICIPATION POLICY

Mandated Participation

All projects that are authorized under HUD's McKinney-Vento Act as amended by the HEARTH Act to provide homeless services and projects receiving HUD funding must meet the minimum HMIS-ERIE participation standards as defined by this Policies and Procedures manual. These participating agencies will be required to comply with all applicable operating procedures and must agree to execute and comply with an HMIS-ERIE Agency Partner Agreement.

Voluntary Participation

Although funded agencies are required to meet only minimum participation standards, the ECDHS strongly encourages funded agencies to fully participate with all their homeless programs. While the ECDHS cannot require non-funded providers to participate in HMIS-Erie, the ECDHS works closely with non-funded agencies to articulate the benefits of HMIS-Erie and to strongly encourage their participation in to achieve a comprehensive and accurate understanding of homelessness in Erie City and County.

Minimum Participation Standards

- Each participating agency shall execute an HMIS-ERIE Agency Partner Agreement.
- Agency staff shall collect the Universal and Program-Specific data elements as defined by HUD and other Federal Partners. Other data elements as determined by the Erie Home Team for all clients served by programs participating in HMIS-ERIE; data may be shared with other agencies subject to appropriate client consent and data sharing agreements.
- Agency staff shall enter client-level data into HMIS-Erie within two business days for emergency housing and five working days of client interaction.
- Participating agencies shall comply with all HUD regulations for HMIS-ERIE participation.

- Each agency shall designate at least one HMIS-ERIE Primary Point Person. This person may or may not also be the Agency Administrator (see below). HMIS-Erie Primary Point Person functions as the main liaison with HMIS-Erie Management Team and is responsible for organizing its agency's users, making sure proper training has taken place for the users and that all paperwork and confidentiality requirements are being followed by all users from that agency.
- Each agency having five or more users must designate at least one user to function as an Agency Administrator. Agencies with fewer than five users have the option of designating an Agency Administrator. The Agency Administrator is expected to provide on-site support to the agency's end-users, run agency reports, monitor the agency's data quality, and work with HMIS-Erie Management Team to troubleshoot HMIS-ERIE issues.

HMIS-ERIE PARTNERSHIP TERMINATION - DATA TRANSFER POLICIES

In the event that the relationship between the ECDHS HMIS-ERIE and a Partner Agency is terminated, the Partner Agency will no longer have access to HMIS-Erie. HMIS-Erie Management Team shall make reasonable accommodations to assist a Partner Agency to export its data in a format that is usable in its alternative database. Any costs associated with exporting the data will be the sole responsibility of the Partner Agency.

HMIS-ERIE SECURITY PLAN

The Continuum has defined a security plan that:

- Ensures the confidentiality, integrity, and availability of all HMIS-ERIE information
- Protects against any reasonably anticipated threats or hazards to security
- Ensures compliance by end-users

HARDWARE, CONNECTIVITY AND COMPUTER SECURITY REQUIREMENTS

Workstation Specification

Computers should meet the **minimum** desktop specification:

- Operating System: Any system capable of running a current Internet browser as specified below
- Processor: 2 GHz Pentium processor or higher; dual core recommended
- Memory: 4gb recommended (2gb minimum)
- Hard Drive: 40 MB available space
- Web Browsers: The most current version of MS Internet Explorer, Chrome or Mozilla Firefox

Internet Connectivity

Partner Agencies must have Internet connectivity for each workstation accessing HMIS-Erie. To optimize performance, all agencies are encouraged to secure a high-speed Internet connection with a cable modem, DSL or T1 line. Agencies expecting a very low volume of data may be able to connect using a dial-up connection; however, HMIS-ERIE management cannot guarantee satisfactory performance with this option.

Any network that has a Wi-Fi component must employ at least WPA2 level security.

Security Hardware/Software

All workstations accessing HMIS-Erie need to be protected by a securely configured 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. Good examples of anti-virus software include McAfee and Symantec (Norton) Security systems, among others.

HMIS-ERIE USER IMPLEMENTATION

Eligible Users

Each Partner Agency shall authorize use of HMIS-Erie 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.

HMIS-Erie Management Team shall authorize use of HMIS-Erie 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 central server responsibilities.

User Requirements

Prior to being granted a username and password, users must sign an HMIS-ERIE confidentiality agreement that acknowledges receipt of a copy of the agency's privacy notice and that pledges to comply with the privacy notice.

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 and should therefore, **never** share their unique user name and password with anyone.

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

Setting Up a New User

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

- Determine the access level of the proposed HMIS-ERIE user
- Execute an HMIS-ERIE user confidentiality agreement
- Review HMIS-ERIE records about previous users to ensure that the individual does not have previous violations with HMIS-Erie Policies and Procedures that prohibit their access to HMIS-Erie
- Verify that an HMIS-ERIE user confidentiality agreement has been correctly executed

- Verify that appropriate and sufficient training has been successfully completed
- Create the new user ID and password in ServicePoint™, or submit request for creation to HMIS-Erie Management Team

If any user leaves the agency or no longer needs access to HMIS-Erie, the Partner Agency is responsible for immediately terminating user access by deleting or inactivating the user account, or by notifying HMIS-Erie Management Team.

Volunteers have the same user requirements that paid staff have. 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 the user understands and complies with all applicable HMIS-ERIE Policies and Procedures.

Enforcement Mechanisms

HMIS-Erie Management Team will investigate all potential violations of any security protocols. Any user found to be in violation of security protocols will be sanctioned.

Sanctions include, but are not limited to:

- A formal letter of reprimand
- Suspension of system privileges
- Revocation of system privileges

A Partner Agency's access may also be suspended or revoked if serious or repeated violation(s) of HMIS-ERIE Policies and Procedures occur by agency users.

HMIS-ERIE AGENCY IMPLEMENTATION

Adding Partner Agencies

Prior to setting up a new Partner Agency within HMIS-Erie database, HMIS-Erie Management Team shall:

- Review HMIS-ERIE records to ensure that the agency does not have previous violations
- Verify that the required documentation has been correctly executed and submitted or viewed on site, including:
 - Partner Agreement
 - Additional Documentation on Agency and Project(s)
 - Designation of HMIS-ERIE Agency Administrator
 - Fee Payment, if applicable
- Request and receive approval from HMIS-Erie Management Team to set up a new agency in HMIS-Erie

- Work with the Partner Agency to input applicable agency and program information
- Work with HMIS-Erie Management Team to migrate legacy data, if applicable

Agency Information Security Protocol Requirements

At a minimum, Partner Agencies must develop security rules, protocols or procedures based on the final *HUD Data and Technical Standards* including but not limited to the following:

- Internal agency procedures for complying with HMIS-Erie Notice of Privacy Practices and provisions of other HMIS-ERIE client and agency agreements
- Maintaining and posting an updated copy of the agency's Notice of Privacy Practices on the agency's website
- 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-ERIE
- 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
- Procedures for regularly auditing compliance with the agency's information security protocol
- HMIS-Erie Management Team conducts annual site visits to monitor compliance with HMIS-ERIE policies, at which time agencies may need to demonstrate their procedures for securing client data.

User Access Levels

All HMIS-ERIE users must be assigned a designated user access level that controls the level and type of access the user will have within the system. Users will have access to client-level data that is collected only by their own agency unless a client specifically consents in writing to share their information.

DATA ACCESS CONTROL POLICIES

User Accounts

Partner Agencies may be permitted to manage user accounts following the procedures documented in HMIS-Erie *User Implementation* section of this manual 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 Partner Agencies must regularly review user access privileges.

Partner Agencies are responsible for inactivating and/or removing users from the system by contacting HMIS-Erie Management Team. They should discontinue the rights of a user immediately upon that user's termination from any position with access. When a user will be on leave for an extended period (longer than 30 days), his/her account should be temporarily suspended within 5 business days from the start of the leave.

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 assigned when a new user is created. The user will be required to establish a new password upon initial log-in. This password will need to be changed every 45 days. A password cannot be used again until another password has expired. Passwords must be between 8 and 16 characters long, contain at least two numbers or symbols, 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. Sanctions will be imposed on the user and/or agency if user account sharing occurs. Any passwords written down should be securely stored and inaccessible to others. They should not be saved on a personal computer.

Password Reset

Except when prompted by ServicePoint™ to change an expired password, users cannot reset their own password. HMIS-Erie Management Team and in some cases, the Agency Administrator, have the ability to temporarily reset a password. If an Agency Administrator needs to have his/her password set, a member of HMIS-Erie Management Team will need to reset that password.

Temporary Suspension of User Access to HMIS-ERIE

System Inactivity

Users must log off from HMIS-Erie application and either lock or log off their respective workstation if they leave the workstation. Also, password protected screen-savers or automatic network log-off should be implemented on each workstation. If the user is logged into HMIS-ERIE and the period of inactivity in HMIS-ERIE exceeds 30 minutes, the user will be logged off HMIS-Erie system automatically.

Unsuccessful Login

If a user attempts to log in 3 times unsuccessfully, the User ID will be "locked out" and their access permission will be revoked; the user will be unable to regain access until the User ID is reactivated by the Agency Administrator or a member of HMIS-Erie Management Team.

Electronic Data Control

Agency Policies Restricting Access to Data

Partner agencies must establish protocols limiting internal access to data based on the final *HUD Data and Technical Standards*.

Downloaded Data

Users have the ability to download and save client-level data. Once this information has been downloaded from HMIS-Erie server, the security of this data then becomes the responsibility of the user and the agency.

Ability to Export Agency-specific Data from HMIS-Erie

Partner Agencies will have the ability to export a copy of their own data for internal analysis and use. Agencies are responsible for the security of this information.

Hardcopy Data Control

Printed versions (hardcopy) of confidential data should not be copied or left unattended and open to compromise. Media containing HMIS-ERIE client-identified data will not be shared with any agency, other than the owner of the data, for any reason. Authorized employees using methods deemed appropriate may transport HMIS-ERIE data between the participating agencies that meet the above standard. Reasonable care should be taken, and media should be secured when left unattended. Magnetic media containing HMIS-ERIE data which is released and/or disposed of by the participating agency and the central server should first be processed to destroy any data residing on that media. Degaussing and overwriting are acceptable methods of destroying data. HMIS-ERIE information in hardcopy format should be disposed of properly. This could include shredding finely enough to ensure that the information is unrecoverable.

HMIS-ERIE PRIVACY PLAN

The Continuum has defined a privacy plan that includes:

- Data collection limitation
- Purpose and use limitations
- Allowable uses and disclosures
- Access and correction standards
- Protection for victims of domestic violence, dating violence, sexual assault, and stalking

DATA COLLECTION LIMITATION POLICY

Partner Agencies will solicit or enter information about clients into HMIS-Erie database only in order to provide services or conduct evaluation or research. Partner Agency management, in consultation with the ECDHS, will decide what qualifies as essential for services or research.

CLIENT NOTIFICATION POLICIES AND PROCEDURES

The ECDHS has prepared standard documents for HMIS-ERIE Notice of Privacy Practices and Client Consent to Release Information which are available on the ECDHS web site. Partner Agencies may either use these forms or incorporate the content of HMIS-Erie documents into the agency's own documentation. All written consent forms must be stored in a client's case management file for record keeping and auditing purposes.

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 program.

HMIS-Erie Management Team conducts annual site visits to monitor compliance with HMIS-ERIE policies, at which time agencies may need to provide examples of the above-mentioned privacy documents and their procedures for protecting the privacy of client data.

Definitions and Descriptions of Client Notification and Consent Procedures

Client Notice

A written notice of the assumed functions of HMIS-Erie 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. No consent is required for the functions articulated in the notice. However, as part of the notification process, clients must be informed of their right to designate their client records as hidden/closed and to view a copy of his/her record upon request. To fulfill this requirement, the agency may either adopt HMIS-Erie Notice of Privacy Practices or may develop an equivalent Privacy Notice that incorporates all the content of the standard HMIS-ERIE Notice. If the agency has a website, the adopted Notice of Privacy Practices or equivalent privacy notice must also be posted on the website.

Hidden/Closed Client Record

After learning about HMIS-Erie, if a client does not wish to have his/her Primary Identifiers accessible to all HMIS-ERIE users, the originating HMIS-ERIE user or HMIS-Erie Management Team should close the client record by locking the security setting on the client screen. Closing a client record will allow the agency to access the client's information for agency purposes. This action will allow HMIS-Erie Management Team to view client-identifying information but will prevent any personal client-identifying information from being accessed by HMIS-ERIE users outside of the originating agency. Contact HMIS-Erie Management Team for assistance, if needed.

Written Client Consent for HMIS-ERIE Data Sharing

At the initial intake, the client should be provided an oral explanation and written documentation about the option of sharing his/her Information within the CoC's HMIS-ERIE.

If a client is willing to share his/her information within HMIS-Erie, he/she must provide written consent pertaining to what he/she is willing to share and with whom (see exception below for the CoC's Coordinated Entry Process).

The client maintains a right to revoke written authorization at any time (except if that policy is overridden by agency policy or if the information is required to be shared as a condition of a provider agreement). Note that any such revocation will not be retroactive to any information that has already been released.

Client Authorization

HMIS-ERIE users may share client information only if the client authorizes that sharing with a valid Client Release of Information form, or in the case of the CoC's Coordinated Entry Process, explicit oral consent.

Authorized users will be able to grant permission based on appropriate client consent to share individual client information with another agency's users. Random file checks for appropriate client authorization, audit trails, and other monitoring tools may be used to ensure that this data sharing procedure is followed. Specific monitoring procedures around program enrollment will be implemented to ensure appropriate client information access.

Applicability of Consents

The Partner 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.

HMIS-ERIE DATA USE AND DISCLOSURE POLICIES AND PROCEDURES

Each of HMIS-Erie Partner Agencies must comply with the following uses and disclosures, as outlined in the *HUD Data and Technical Standards: Notice for Uses and Disclosures for Protected Personal Information (PPI)*. A Partner Agency has the right to establish additional uses and disclosures if they do not conflict with the CoC-approved uses and disclosures.

Privacy Notice Requirement

Each Partner Agency must publish a privacy notice that incorporates the content of the *HUD Data and Technical Standards Notice* as described below. Agencies that develop their own privacy and security policies must allow for the de-duplication of homeless clients at the Continuum level.

Each agency must post the privacy notice and provide a copy of the privacy notice to any client upon request. If an agency maintains a public web page, the agency must post the current version of its privacy notice on its web page.

An agency's privacy notice must:

- Specify all potential uses and disclosures of a client's personal information
- Specify the purpose for collecting the information
- Specify the time period for which a client's personal information will be retained at the agency
- Offer reasonable accommodations for persons with disabilities and/or language barriers throughout the data collection process
- Allow the individual the right to inspect and to have a copy of his/her client record and offer to explain any information that the individual may not understand

- Specify a procedure for accepting and considering questions or complaints about the privacy and security policies and practices

CoC-approved Uses and Disclosures

Identifiable HMIS-ERIE client data may be used or disclosed for case management, billing, administrative and analytical purposes.

- Case management purposes include uses associated with providing or coordinating services for a client. As part of case management, the agency will share client information with other agencies based only on written client consent, or in the case of the CoC's Coordinated Entry Process, explicit oral consent (see p. 19)
- Billing example is invoicing funding sources for reimbursement of services
- Administrative purposes are uses required to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions. An example would be analyzing client outcomes to evaluate program effectiveness
- Analytical purposes are functions that are related to analyzing client data to understand homelessness, including but not limited to creating de-identified protected personal information, understanding trends in homelessness and the needs of persons who are homeless, and assessing the implementation of the CoC's Strategic Plan

Unless a client requests that his/her record remains hidden, his/her primary identifiers will be disclosed to other HMIS-ERIE agencies. This will allow agencies to locate the client within HMIS-Erie system when the client comes to them for services. This will allow the CoC to determine how many people are homeless in Erie County during any specified timeframe.

Identifiable client information may also be used, or disclosed, in accordance with the *HUD Data and Technical Standards* for:

- Uses and disclosures required by law
- Aversion of a serious threat to health or safety
- Uses and disclosures about victims of abuse, neglect or domestic violence
- Uses and disclosures for academic research purposes
- Disclosures for law enforcement purposes in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial office or a grand jury subpoena

Aside from the disclosures specified above, a client's protected personal information will be disclosed only with his/her written consent.

HMIS-ERIE DATA RELEASE POLICIES AND PROCEDURES

Client-identifying Data

No identifiable client data will be released to any person, agency, or organization for any purpose other than those specified in HMIS-Erie *Data Use and Disclosure Policies and Procedures* section of this manual without the written permission of the client.

Data Release Criteria

HMIS-ERIE client data will be released only in aggregate, or in anonymous client-level data formats, for any purpose beyond those specified in HMIS-Erie *Data Use and Disclosure Policies and Procedures* section of this manual, such that the identity of any individual or household cannot be determined.

Data Release Process

Beyond individual agency reports, or ECDHS reports on its funded programs, the ECDHS Housing Team Director must approve all data for public classification and release.

Specific Coordinated Entry Process Exception to Written Consent Requirement

The CoC's Coordinated Entry Process will not be required to obtain written consent to share primary and general client information collected primarily through telephonic or other electronic means. However, all clients must be informed of their rights regarding HMIS-ERIE participation. Clients will be read the Coordinated Entry's consent and notifications script. Clients can view the Privacy Notice on the ECDHS website or pick up a copy at the ECDHS office. Callers who do not want their information shared in HMIS-ERIE will have their records closed and/or may be limited in their ability to obtain an agency referral.

Specific Client Notification Procedures for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

A mainstream agency that is serving a victim of domestic violence, dating violence, sexual assault, or stalking must explain the potential safety risks for victims and the client's specific options to protect her/his data, such as designating her/his record as hidden/closed to other agencies.

Specific Client Notification Procedures for Unaccompanied Minor Youth

Based on their age and potential inability to understand the implications of sharing information, HMIS-Erie cannot be used to share information about unaccompanied minor youth outside of the originating agency. Thus, even with written client authorization, users cannot share any client information of unaccompanied minor youth. For the purposes of this policy, minor youth are defined as youth under 18.

Privacy Compliance and Grievance Policy

Partner Agencies must establish a regular process of training users on this policy, 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. Agencies may want to appoint a Chief Privacy Officer to be responsible for these tasks.

HMIS-ERIE DATA QUALITY PLAN

HMIS-ERIE DATA COLLECTION

The Continuum has defined a data quality plan that:

- Based on HUD data standards and CoC data requirements, specifies the importance of data quality and standards to be used by all participating agencies
- Provides a mechanism for monitoring adherence to the standards
- Provides the necessary tools and training to ensure compliance with the standard
- Includes strategies for working with agencies that are not in compliance with the standard

Data Quality Standard

- All data entered will be accurate
- Per HUD data standards, blank entries in required data fields will not exceed 5% per month
- All services provided will be compatible with providing program
- Data entry, including program Entry and Exit transactions, must be complete within 2 working days for emergency shelters and 5 working days for other projects

Data Quality Monitoring

HMIS-Erie Management Team will perform regular data integrity checks on HMIS-Erie data. Any patterns of error at a Partner Agency will be reported to the Agency Administrator and/or Executive Director. When patterns of error have been discovered, users will be required to correct data entry techniques and will be monitored for compliance.

Partner Agencies are expected to:

- Run and submit data completeness reports, data incongruities reports, and other data quality reports as required by HMIS-ERIE Lead staff
- Review monthly APRs to confirm accurate program entry and exit data
- Notify HMIS-ERIE Lead staff of findings and timelines for correction
- Rerun reports for agencies/programs to confirm data correction

Data Collection Requirements

Required Data Elements

A Partner Agency is responsible for ensuring that a minimum set of data elements, referred to as the Universal Data Elements (UDE's) and Program-specific Data Elements as defined by the *HUD Data and Technical Standards*, and other data elements as determined by HMIS-Erie Committee, will be collected and/or verified from all clients at their initial program enrollment or as soon as possible thereafter. Partner Agencies are required to enter data into HMIS-Erie within 2 working days for emergency shelters and 5 business days for other projects.

These required data elements are all included collectively on the *Client Profile*, *Client Demographics* section, *Entry*, and *Interim and Review* assessments and includes timely entry of program Entry and Exit transaction data.

Partner Agencies must report client-level UDE's and Program-specific Data Elements using the required response categories detailed in the *HUD Data and Technical Standards*. These standards are already incorporated into HMIS-Erie.

Entry/Exit Data

Program entry and exit dates should be recorded upon any program entry or exit on all participants. Entry dates should be recorded in compliance with project funding. Typically, they are the first day of service or program entry with a new program entry date for each period/episode of service. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter or the last day a service was provided.

Data Quality Training Requirements

End-User Training

Each end user of HMIS-Erie system must complete ECDHS approved HMIS-ERIE training before being given HMIS-ERIE log-in credentials. It is recommended they also receive training from their Agency Administrator in order to understand agency-specific nuances in how they enter data. HMIS-ERIE Primary Point Persons and Agency Administrators should notify the ECDHS when they have specific training needs for their end-users.

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 Provider Reports in ServicePoint™, reports in the Advanced Reporting Tool (ART), and may include opportunities for training in report creation using ART. (Note: Use of ART requires a separate Report Viewer or Ad- hoc Report Creation license).

Agencies are expected to run their own data quality reports so that they can monitor their own data quality and become more effective in serving our clients across the Continuum.

HMIS-ERIE DE-DUPLICATION OF DATA - POLICIES AND PROCEDURES

De-duplicating Data Elements

HMIS-Erie application will use the following data elements to create unduplicated client records:

- Name (first, middle, last, suffix; aliases or nicknames should be avoided)
- Social Security Number
- Date of Birth (actual or estimated)
- Gender
- Race and Ethnicity

User-mediated Look-up

The primary way to achieve de-duplication will be a user-mediated search of the client database prior to creating a new client record. The user will be prompted to enter a **minimum** number of the data elements into HMIS-Erie application, and a list of similar client records will be displayed. Based on the results, the user will be asked to select a matching record if the other identifying fields match correctly.

If the user is unsure of a match (either because some data elements differ or because of blank information), the user should query the client for more information and continue evaluating possible matches or create a new client record.

The user will not be able to view sensitive client information or program-specific information during the de-duplication process. After the client record is selected, the user will be able to view previously existing portions of the client record only if he/she has explicit authorization to view that client's record.

TECHNICAL SUPPORT

HMIS-ERIE TECHNICAL SUPPORT POLICIES AND PROCEDURES

HMIS-ERIE Application Support

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

During the normal business hours of the ECDHS of 8:30 am – 5 pm:

- Begin with utilization of the on-line help and/or training materials
- If the question is still unresolved, direct the technical support question to the Agency Administrator
- If the question is still unresolved, the Agency Administrator can direct the question to HMIS-Erie Management Team

- If the question is still unresolved, HMIS-Erie Management Team will direct the question to Bowman Systems technical support staff

After the normal business hours of the ECDHS:

- Begin with utilization of the on-line help and/or training materials
- If the question can wait to be addressed during the following business day, wait and follow the normal business hours procedure outlined above
- If the question cannot wait, direct the technical support question to the Agency Administrator, if available
- If unavailable, and the question is still unresolved, contact HMIS-Erie Management Team, or the duly appointed representative. They will determine the appropriate procedure to be followed

If it is determined that the issue needs immediate attention, the user's request will be forwarded to an appropriate HMIS-ERIE technical support representative. Otherwise, the user will be instructed to pursue assistance through normal channels on the following business day.

User Training

HMIS-Erie Management Team will provide HMIS-ERIE application training periodically throughout the year. If additional, or specific, training needs arise, HMIS-Erie Management Team may arrange for special training sessions.

Agency/User Forms

All Agency Administrators and Users will be trained in the appropriate on-line and hardcopy forms. If the Agency Administrator or User has questions on how to complete HMIS-ERIE forms, he/she shall contact HMIS-Erie Management Team.

Report Generation

Each Agency may send its Agency Administrator to receive training on how to develop agency-specific reports using HMIS-Erie application. HMIS-Erie Management Team will be a resource to agency users as they develop reports but will be available to provide only a limited, reasonable level of support to each Agency.

Programming-related Service Requests

If a user encounters programming issues within HMIS-Erie application that need to be addressed, that user should identify the error or suggest an improvement to the Agency Administrator. The Agency Administrator will forward this information to HMIS-Erie Management Team, identifying the specific nature of the issue or recommended improvement, along with the immediacy of the request.

HMIS-Erie Management Team will review all application service requests and determine the action to be taken. Requests to fix programming errors will be prioritized and

forwarded to Bowman Systems. Suggested application improvements will be compiled and periodically discussed by HMIS-Erie Committee and HMIS-Erie User Group. A prioritized list of improvements will be submitted to HMIS-Erie Management Team for review. Approved recommendations will be submitted to Bowman Systems.

HMIS-ERIE SYSTEM AVAILABILITY POLICIES

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

APPENDIX A: GLOSSARY OF HMIS-ERIE ACRONYMS AND TERMS

Adapted from <http://www.HMIS-Erie.info/Resources/742/HMIS-ERIE-Acronyms-and-Definitions.aspx>

Acronyms

AIRS - ECDHS of Information & Referral Systems

AHAR - Annual Homeless Assessment Report

APR - Annual Performance Report

CHO – Contributing HMIS-ERIE Organization

CoC - Continuum of Care

DOB - Date of Birth

DV - Domestic Violence

ESG - Emergency Solutions Grants

eHIC – electronic Housing Inventory Chart

FIPS - Federal Information Processing Standards Codes for states, counties, and named populated places.

HEARTH – Homeless Emergency Assistance and Rapid Transition to Housing

HIPAA - Health Insurance Portability and Accountability Act of 1996

HMIS - Homeless Management Information System

HUD - U.S. Department of Housing and Urban Development

I&R - Information and Referral

MH - Mental Health

NOFA - Notice of Funding Availability

PIT - Point in Time

PKI - Public Key Infrastructure

PPI - Personal Protected Information

S+C - Shelter Plus Care (McKinney-Vento Program)

SA - Substance Abuse

SHP - Supportive Housing Program

SRO - Single Room Occupancy
SSN - Social Security Number
SSI - Supplemental Security Income
SSO - Supportive Services Only
SSVF – Supportive Services for Veteran Families Program
TA - Technical Assistance
TANF - Temporary Assistance for Needy Families
VAWA - Violence Against Women Act
XML - Extensible Markup Language

Terms

Alliance of Information and Referral Systems (AIRS)

The professional association for over 1,000 community information and referral (I&R) providers serving primarily the United States and Canada. AIRS maintains a taxonomy of human services.

Annual Performance Report (APR)

A 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

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 person as a homeless individual with a disabling condition who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency homeless shelter during

that time. *Persons under the age of 18 are not counted as chronically homeless individuals.*

Chronically Homeless Household

HUD defines a chronically household as a family that has at least one adult member (persons 18 or older) who has a disabling condition who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter/safe haven during that time.

Client Intake

The process of collecting client information upon entrance into a program.

Consumer

An individual or family who has experienced or is currently experiencing homelessness.

Continuum of Care (CoC)

A community with a unified 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 maximize self-sufficiency. HUD funds many homeless programs and HMIS-ERIE implementations through Continuum of Care grants.

Coverage

A term commonly used by CoCs or homeless providers. It refers to the number of beds represented in an HMIS-ERIE divided by the total number of beds available.

Contributing HMIS-ERIE Organization (CHO)

Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes data on homeless clients for an HMIS-ERIE. The requirements of HMIS-Erie Final Notice apply to all Contributing HMIS-ERIE Organizations.

Data Quality

The accuracy and completeness of all information collected and reported to HMIS-Erie.

Data Standards

See HMIS-ERIE Data and Technical Standards Final Notice.

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.

Digital Certificate

An attachment to an electronic message used for security purposes. The most common use of a digital certificate is to verify that a user sending a message is who he or 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.

Emergency Shelter

Any facility whose primary purpose is to provide temporary shelter for the homeless in general or for specific populations of the homeless.

Emergency Solutions Grant (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.

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.

Final Notice

See HMIS-ERIE Data and Technical Standards Final Notice.

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.

HEARTH Act

On May 20, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. The HEARTH Act amends and reauthorizes the McKinney-Vento Homeless Assistance Act.

Homeless Management Information System (HMIS-ERIE)

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.

HMIS-ERIE Data and Technical Standards Final Notice

Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS-ERIE. HMIS-Erie *Final Notice* contains rules about who needs to participate in HMIS-ERIE, what data to collect, and how to protect client information.

Housing Inventory Chart (HIC)

A calculation of the numbers of beds and housing units in a region on one particular night, usually coinciding with the annual Point-in-Time count.

Inferred Consent

Once clients receive an oral explanation of HMIS-ERIE, consent is assumed for data entry into HMIS-ERIE. The client must be a person of age, and in possession of all his/her faculties (for example, not mentally ill).

Informed Consent

A client is informed of options of participating in an HMIS-ERIE 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.).

Information and Referral

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 non-profit and governmental agencies. An HMIS-ERIE usually includes features to facilitate information and referral.

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 Solutions Grant Program.

Notice of Funding Availability (NOFA)

An announcement of funding available for a particular program or activity.

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.

Permanent Supportive Housing

Long term, community based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. Permanent housing can be provided

in one structure or in several structures at one site or in multiple structures at scattered sites.

Point in Time Count

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.

Privacy Notice

A written, public statement of an agency's privacy practices. A notice informs clients of how personal information is used and disclosed. According to HMIS-Erie *Data and Technical Standards*, all covered homeless organizations must have a privacy notice.

Program-specific Data Elements

Data elements required for programs that receive funding under the McKinney-Vento Homeless Assistance Act and complete the Annual Performance Reports (APRs).

Public Keys

Public keys are included in digital certificates and contain information that a sender can use to encrypt information such that only a particular key can read it. The recipient can also verify the identity of the sender through the sender's public key.

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.

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.

Shelter Plus Care Program

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.

Supportive Housing Program

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.

Transitional Housing

A project that has as its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months).

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 Elements

Data required to be collected from all clients serviced by homeless assistance programs using an HMIS-ERIE. 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.

Written Consent

Written consent embodies the element of informed consent in a written form. A client completes and signs a form documenting the client's understanding of the options and risks of participating or sharing data in an HMIS-ERIE system and consenting to such participation and data sharing. The signed document is then kept on file at the agency.