

HMIS POLICIES AND PROCEDURES

Introduction

An HMIS is an electronic data collection system that stores longitudinal person-level information about persons who access the homeless services system in a Continuum of Care (CoC). In 2001, Congress directed the United States Department of Housing and Urban Development (HUD) to collect data and provide analysis on the extent of homelessness in the United States and the effectiveness of the programs receiving funding from homeless assistance grants as part of McKinney-Vento Homeless Assistance Act. This is to be accomplished through:

- Developing unduplicated counts of clients served at the local level
- Analyzing patterns of use of people entering and exiting the homeless assistance system; and
- Evaluating the effectiveness of these systems.

In response to this congressional directive, HUD mandated that Continuums of Care establish workable and efficient Homeless Management Information Systems (HMIS). Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at the local, state, and national levels. Today's advanced HMIS applications offer many other benefits as well. They enable organizations that operate homeless assistance and homelessness prevention programs to improve case management by collecting information about client needs, goals, and service outcomes. They also help to improve access to timely resources, referral information and to better manage operations.

The Solano County Homeless Management Information System (HMIS) is a collaborative project of Housing First Solano. The HMIS enables the CoC to:

- Develop more reliable information on homelessness in the County;
- Allow homeless service providers to avoid duplication of services while ensuring that clients obtain the help they need from as many of the available resources as possible; and
- Streamline systems so that homeless individuals and families have improved access to services.

The purpose of this manual is to provide documentation of the policies and procedures for the operation of the Solano County HMIS project on behalf of Housing First Solano, the Vallejo/Solano County Continuum of Care.

Project Description

Housing First Solano seeks to enhance agency collaboration, service delivery, and data collection capabilities through the Homeless Management Information System (HMIS). Increasing the accuracy of information must be an ongoing goal in order to appropriately guide the development of programs and policies to meet the needs of the homeless population.

By using HMIS data, Housing First Solano will be better equipped to target services where gaps have been identified and to facilitate access to mainstream services by people experiencing homelessness. Additionally, HMIS data will help the CoC identify appropriate system-wide outcome measures, including monitoring residential outcomes of clients leaving hospitals, mental health programs, drug and alcohol treatment facilities, the corrections system, and the foster care system who are homeless or at-risk.

The long-term vision for the Housing First Solano HMIS includes system-level integration, increased capacity for providing integrated services at the client level, and expanded service availability and accessibility in key areas.

HMIS Structure

Housing First Solano uses ServicePoint software from Bowman Systems, Inc. The HMIS Lead Agency administers this system. Housing First Solano is a collection of agencies in the county who provide services to benefit homeless persons. The HMIS is actively maintained by staff from the HMIS Lead Agency.

Authority

This Policy and Procedures Manual has been prepared under the authority of the HMIS subcommittee.

Policy Group

Policies for the HMIS are formed and directed by the HMIS subcommittee as required to meet HUD regulations and requirements. This group consists of members from each agency participating in the HMIS. Policy Group decisions are achieved through consensus.

The Policy Group sets policies and procedures required to operate the HMIS and achieve the goals set by the Continuum of Care for its HMIS. Policies and procedures that do not affect the HMIS on a system-wide basis fall outside the purview of this group.

Data Elements

HUD required Universal Data Elements

It is the policy of Housing First Solano that system users record all HUD-required HMIS universal data elements for every client in the system. The list of required data elements will be maintained by the Local HMIS Manager.

Program Specific Data Elements

Program Specific Data Elements (PSDE) must be also be entered in HMIS. The list of required Program Specific Data Elements will be maintained by each Agency HMIS Manager.

Client Consent

- Only authorized users may view or update client data in the HMIS.
- Agencies will have a signed Release of Information (ROI) prior to data entry/updating, or preliminary verbal consent for projects that use phone intake/screening.
- Each adult member of a household that is receiving housing or services will be expected to sign a ROI prior to initial data entry or updating.
- Consent for data entry/updating for minors will be provided for in the language of the parent/guardian's ROI.
- A legal guardian can sign for an adult who is incapable of signing.
- The ROI must be renewed every two years for clients still receiving housing and services.
- A client may revoke the ROI at any time.
- A ROI allows an agency to view (but not change) data on the clients for reporting purposes in perpetuity.
- If a ROI cannot be obtained, the agency shall enter client data as non-releasable, hidden information for aggregate reporting purposes.
- A client always has the right to view his or her own data and request corrections.

Anonymous Clients Policy

It is the Policy of Housing First Solano that there will be no use of Anonymous Clients, with the exception of those entered by Agencies that provide services to victims of domestic violence, in the HMIS.

Timelines of Data Entry Policy

It is the Policy of Housing First Solano that all data will be entered into the HMIS preferably within 24 hours of, and no more than 72 hours after, first serving a Client. Services data shall be entered into the HMIS within five (5) working days after the end of the month for projects that require tracking of services.

Project Entry Type Policy

It is the policy of Housing First Solano that an Entry Assessment shall be completed for each client. Projects shall choose the entry type that corresponds with their funding source. The possible entry types are:

- HUD
- PATH
- RHY
- VA

Client Birth Dates Policy

In compliance with the HMIS Data Standards, it is the policy of Housing First Solano that no client birth date shall be left with a null value. When clients do not know or will not give a birth date the interviewer should ask how old the client is or how old the client thinks he/she is. Using the age provided, calculate the birth date as January 1 that number of years prior. In cases where the client refuses to state their birth date or age, the interviewer will estimate the client's age in years and then calculate the birth date as January 1 that number of years prior. Whenever calculated birth dates are used, Date of Birth Type shall be set to Approximate or Partial DOB Reported.

Data Disposal

Agencies using the HMIS agree to dispose of documents that contain identifiable client level data in a manner that will protect client confidentiality. Methods may include:

- Cross cut shredding of paper records;
- Deleting any information from media and destroying the media before disposal;
- Triple formatting hard drive(s) of any machine containing client identifying information before transfer of property; and/or
- Destruction of hard drive(s) of any machine containing client-identifying information before disposal.

Security

It is the policy of Housing First Solano that the data, information and client records, and related documentation stored electronically in connection with the HMIS is confidential and shall be handled as follows:

- All agencies shall comply with all federal, state and local laws and regulations pertaining to the confidentiality of information and records to ensure that client records are protected and not subject to disclosure except as permitted by such laws and regulations. The agencies shall only release client records to non-participating agencies with written consent by the client, unless otherwise provided for in the relevant laws and regulations.
- All agencies shall comply with all federal, state and local confidentiality laws and regulations pertaining to:
 - All medical conditions, including, but not limited to, mental illness, alcohol and or drug abuse, HIV/AIDS testing, diagnosis and treatment and other such covered conditions; and
 - A person's status as a victim of domestic violence.
- All agencies agree not to release any individual client information obtained from the HMIS to any organization or individual without prior written consent of the Client, unless otherwise required or permitted by applicable law or regulation. Such written Client consent shall be documented using the HMIS Release of Information form available on the CoC website. Information that is not approved for disclosure, in writing, by the Client shall not be released.
- Only authorized users may view or update client data.
- Client Release of Information forms must be obtained as described in the Client Consent section of this document prior to entering the Client's data into the HMIS.
- All agencies shall ensure that all staff, volunteers and other persons who are issued a User ID and password for the HMIS annually receive confidentiality training regarding client information and records and have signed a Confidentiality and Security Agreement.
- If any agency or the System Administrator determines that any user has willfully committed a breach of HMIS security or client confidentiality, the participating agency or the System Administrator shall immediately revoke his or her access to the HMIS database and shall report the breach to the HMIS Lead Agency.
- All HMIS data must be securely stored when not in use, regardless of the media on which the information is recorded.

A confidentiality and security agreement form must be completed for each user of the HMIS each year. The form reads as follows:

- The user understands and agrees that they may not publish, disclose, or use any information collected for or contained within the HMIS except as permitted by the Vallejo-Solano County Continuum of Care procedures or by applicable law.
- The user understands and agrees that all passwords and/or other security measures assigned to them are to be used solely by themselves, and are not to be disclosed to or utilized by any other individual.
- The user understands and agrees that if they knowingly and intentionally violate the confidentiality provisions of the applicable rules and regulations, they may be subject to termination and subject to liability under applicable law.
- The user understands and agrees that their obligations under the Agreement shall remain in effect following any termination of this Agreement or of their employment with the agency listed on the form.

Privacy

The rights and privileges of clients are of the utmost importance to Housing First Solano's HMIS project and are crucial to its success. Policies regarding client data are founded on the premise that a client owns their own personal information, and provide the necessary safeguards to protect the interests of clients, agencies, and the Continuum alike.

Personal Identifying Information

There are four items of information that are known as "personal identifying information": a person's name, social security number, date of birth, and gender. The HMIS uses these items of information to uniquely identify clients within the system. Clients are not required to grant permission to share personal identifying information for use in HMIS to receive services; Housing First Solano agencies will provide services whether or not clients agree to share their personal identifying information with other agencies in the HMIS. However, clients may be required to provide personal identifying information to prove eligibility for a program or service.

Use of Information

Information clients consent to enter into the HMIS will be used in the following ways:

- By the Continuum of Care, to administer the HMIS, to ensure that the data in the system is accurate and valid, to fix problems in the computer system, and to test the system;
- By the Continuum of Care, to prepare reports containing "de-identified" information for the purpose of sharing data and preparing reports for HMIS users, government agencies and policy-makers, and the general public. "De-identified" means that a client's name, social security number, address, zip code, or any other information that could be used to identify the client will **not** appear in any of the data or the reports released by an HMIS user or the Continuum of Care;
- By other agencies participating in HMIS, in order to assist those agencies to more effectively provide and coordinate services for clients.

In addition to the uses above, the Continuum of Care and agencies participating in HMIS may also use and disclose information clients provide us in the following ways:

- For functions related to payment or reimbursement for services;
- To carry out internal administrative functions;
- To report abuse, neglect, or domestic violence, but only to the extent that such reports are required by law;
- To prevent or lessen a serious and imminent threat to the health or safety of a person or the public, including the target of a threat, if permitted by applicable law;
- In response to a warrant, subpoena, summons, or lawful court order, or in response to a written or oral request by a law enforcement official under certain circumstances;
- To a law enforcement official, if we in good faith believe a crime has occurred on our premises;
- To an individual or institution for academic research purposes;
- To authorized federal officials for the conduct of certain national security or certain activities associated with the protection of certain officials.

Client Rights

Clients have the right to see and receive a copy of the information that the Housing First Solano HMIS maintains about them, except for information compiled in anticipation of litigation, information about another individual, information obtained under a promise of confidentiality, or information that would, if disclosed, endanger the life or safety of another. The Housing First Solano HMIS Administrator will consider changing any information about a client if the client believes the recorded information is inaccurate.

If a client believes that their privacy rights have been violated, they may send a written complaint to the System Administrator. If the System Administrator is the subject of the complaint, the client may send the complaint to the HMIS Lead Agency. The Agency in question and Housing First Solano are prohibited from retaliating against a person for filing a complaint.

System Access

The System Administrator will monitor access to system software. The System Administrator will regularly review user access privileges and remove identification codes and passwords from their systems when users no longer require access.

Departing Employees

When an employee with access to the HMIS ends their employment at a participating agency, it is the responsibility of the Agency to contact the System Administrator to delete the departing person's access to the HMIS within 24 hours of their departure.

If an employee is to be terminated and the employee has access to the HMIS, it is the responsibility of the Agency to contact the System Administrator to have them delete the departing person's access to the system as soon as the employee has been advised of the termination.

New HMIS Users Procedure

The Agency must contact the System Administrator when the Agency wishes to add new users of the HMIS to the list of authorized users. New users must read and sign the security agreement and the Agency Administrator in their files must maintain the signed copy for the duration of its validity.

All new system users must attend Security and Ethics training prior to being assigned a user ID. Security and Ethics training must be repeated once each 12 months thereafter. The user is responsible for complying with the security and ethics procedures contained in this document.

Mandatory Training Activities

In order to meet HUD requirements, it is the policy of Housing First Solano that all users of the HMIS shall attend mandatory training once per calendar year on the subjects of Privacy & Ethics, Data Security and Data Quality. It is the responsibility of the System Administrator to schedule not less than four (4) sessions per year for this training and to publish the schedule to the Agencies for dissemination to agency users.

The System Administrator shall maintain written records of attendance and any user who has not completed the training within each calendar year shall have their access to the HMIS suspended until such training is completed.

Agency Monitoring for Compliance

In order to meet HUD requirements, it is the policy of Housing First Solano that all agencies that use the HMIS must be reviewed once per calendar year for compliance with the HUD regulations and local policies.

It is the responsibility of the System Administrator to develop a standardized policy review document and to carry out, or assign a designate to carry out, the annual compliance assessment. Agencies must receive a thirty-day advance notice of the scheduled assessment and a copy of the items that will be reviewed. Notice will be sent to the Agency Administrator.

Licensing and Billing

The HMIS Lead Agency shall designate a Fiscal Agent to administer payment for fees associated with the HMIS. The HMIS Lead Agency shall submit to the Fiscal Agent written notification of all outstanding fees associated with the HMIS and incurred on or before February 1. All HMIS user licenses with active status on February 1 will be renewed.

It is the responsibility of any agency using the HMIS to submit payment for fees associated with the HMIS and incurred on or before February 1 to the Fiscal Agent no later than 30 days after the date of the invoice received for those fees. The HMIS Lead Agency reserves the right to suspend an agency's HMIS user license(s) if that agency fails to submit

payment for any fee associated with the HMIS and incurred on or before February 1 to the Fiscal Agent on or before 30 days after the date of the invoice received for those fees.

If an agency wishes to discontinue any HMIS user license(s), it is that agency's responsibility to submit to the HMIS Lead Agency a written request that includes: (1) the number of HMIS user licenses to be discontinued; and (2) the name(s) of the licensee(s). The request must be delivered to the HMIS Lead Agency no later than January 31. Fees paid for the year in which the license(s) are discontinued will not be refunded.

If an agency wishes to purchase any new HMIS user license(s), it is that agency's responsibility to submit to the HMIS Lead Agency a written request that includes: (1) the number of HMIS user licenses to be purchased; (2) the name(s) and email address(es) of the person(s) to whom the license(s) will be assigned; and the name, physical address and email address where the invoice for the purchase should be sent for payment. The HMIS Lead Agency shall then submit to the Fiscal Agent written notification of all fees associated with that purchase on or about the date of the purchase. An agency wishing to purchase any new HMIS user license(s) will be invoiced a prorated fee for the period beginning on the date of the purchase and continuing through January 31. It is the responsibility of any agency that has purchased any new HMIS user license(s) to submit payment for all fees associated with that purchase to the Fiscal Agent on or before 30 days after the date of the invoice received for the purchase. The HMIS Lead Agency reserves the right to suspend an agency's HMIS user license(s) if that agency fails to submit payment for any fee associated with that purchase to the Fiscal Agent on or before 30 days after the date of the invoice received for the purchase.

If an agency wishes to receive a refund for a fee associated with the HMIS, that agency may submit a written request to the HMIS Lead Agency expressing justification for a refund. The HMIS Lead Agency reserves the right to deny such requests for any reason.

An agency may request a subsidy for their HMIS licenses. In order to qualify for an HMIS License Subsidy, the agency must demonstrate a financial hardship, how they will use the HMIS, and the value it will add to the Continuum. To request a HMIS License Subsidy, an agency must submit a completed [HMIS Subsidy Request Form](#) to the HMIS Lead Agency by email at SolanoHMIS@homebaseccc.org. The HMIS Lead Agency reserves the right to deny such requests for any reason.