Homeless Management Information System (HMIS)

Standard Operating Procedure

LEE COUNTY BOARD OF COUNTY COMMISSIONERS

Human and Veteran Services: Administration

Lee County, FL

Version 1.0

October 6, 2020

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESC OF CHANGE	AUTHOR
1.0	CoC Data Committee	October 6, 2020	Original	HVS

Contents

DEFINITIONS

1. **Agency Administrator:** Designated staff person at each HMIS participating agency that is responsible for maintaining data quality, running data quality reports, and communicating with the HMIS lead agency.

2. **Anonymous client:** A client entered into the database with a unique computer generated identifying code acting as a reference for that client.

3. **Personal Identifying Information (PII):** any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

4. **Client Services Network:** A web-based information management system developed by Bell Data Systems which provides client tracking, case management, and reporting

5. **Client:** Any person whose data is entered into HMIS.

6. **Client's guardian:** Any person legally responsible for a minor or an adult, according to Florida Statutes. All references to "client" in this policy also apply to "client's guardian."

7. **Close to real-time:** Data entry within one business day.

8. **CoC Governing Board:** The group of community stakeholders that is responsible for the planning and oversight of the CoC, HMIS, and Coordinated Entry Systems in accordance with 24 CFR 578.7

9. **Coordinated Entry** - the process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

10. **Data Committee:** A committee of the Lee County Homeless Coalition that is responsible for ensuring that the CoC General Membership and Governing Board have timely access to the quality data necessary to make data driven planning possible; including 1) regular review of data reports; tracking system performance; 2) responding to CoC data requests; 3) evaluating the quality, timeliness, and accuracy of data input, data management and data reports; and 4) maintaining and implementing the Data Quality Plan.

11. **Data Quality:** Measures relating to the accuracy, completeness, and timeliness of data entered into HMIS.

12. **End-user:** Any person given access to HMIS including staff and volunteers

13. **HMIS Lead Agency:** The organization responsible for the operation of an HMIS system in accordance with 24 CFR 578.7(b), in Lee County, this organization is Lee County Human and Veteran Services.

14. **Homeless Management Information System (HMIS):** the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client level data and data on the provision of housing and services to individuals and families who are homeless or at risk of homelessness

15. **Licensing Fees:** Fees charged to HMIS participating agencies for the purpose of paying for user licenses.

16. **Partner Agency:** An agency that provides housing and/or services to persons experiencing homelessness and is authorized to participate in HMIS.

17. **Technical Support Staff:** Staff of the HMIS lead agency and the HMIS software vendor that provide support to users.

PURPOSE

The purpose of this policy is to outline consistent policies and procedures for the collection, administration, and reporting of data for the Lee County Continuum of Care's Homeless Management Information System (HMIS). This policy serves as direction for the administration of the HMIS across the Continuum of Care, including at participating agencies and the HMIS lead agency. The HMIS is used to collect data about persons experiencing homelessness, including unduplicated counts of individuals who are homeless, and to record data regarding the use of services and the effectiveness of local assistance systems. HMIS maintains confidential client records in a secure environment to ensure information is not misused or accessed by unauthorized persons.

Lee County Human and Veteran Services (HVS) serves as the lead agency for the Continuum of Care (CoC) and HMIS. The CoC has selected Bell Data Systems' Client Services Network (CSN) software as the HMIS vendor to meet HUD requirements.

APPLICABILITY/SCOPE

To ensure procedural consistency, accountability, and compliance this policy will outline polices, grant related polices, and procedures for recording, managing and reporting data within the HMIS. These policies are intended to ensure that HMIS data can be employed to better understand the characteristics of persons experiencing homelessness in the community, improve the delivery of housing and services, and document the community's progress in ensuring that homelessness is a rare, brief, and one-time experience.

Policies and standard operating procedures for programs and services for persons who are experiencing homelessness can be found in the most current versions of the following documents:

- HVS SoPs
- CoC Written Standards
- Coordinated Entry Policies and Procedures

POLICY & PROCEDURE

1. HMIS Lead Agency

1.1. System Management

Policy:

1) HMIS System Management will be carried out by the HMIS Lead Agency. The HMIS Lead Agency will maintain and update security and privacy policies as described in this document.

Procedure:

2) The HMIS Lead System Management Responsibilities include:
   a) Monitoring HMIS Vendor compliance with all contract obligations and the latest HUD standards
   b) Coordinating with the HMIS vendor in monitoring functionality, speed, and database backup procedures of SQL server
   c) Responding to system needs as they arise
   d) Implementing a disaster recovery plan
   e) Setting up HMIS Agencies and Projects according to the latest HUD Data Standards to ensure HUD-Compliant database hierarchy and structure
   f) Maintaining an updated List of Agency Administrators
   g) Acting as a point of contact to resolve technical and operational issues with agency administrators
   h) Supervising internal and external security protocols
   i) Collecting and maintaining homeless service provider descriptor data in HMIS
   j) Adding and removing users as needed
   k) Managing User Permissions
   l) Ensuring that the HMIS is able to record data from a theoretically limitless number of service transactions and historical observations for data analysis over time and assessment of client outcomes, while following Federal, state, territorial, or local data retention laws and ordinances.

1.2. Reporting

Policy:

1) The lead agency shall generate, submit to the Data Committee for review and submit to HUD, all HUD required system level reports in the applicable reporting system prior to the federally mandated deadline.
2) The lead agency must submit system and project level performance report cards to the data committee not less than one time quarterly, and CoC Governing Board not less than one time annually.

Procedure

1) The lead agency shall provide technical assistance to funded provider agencies who are required to submit Annual Performance Reports - due date varies by grant award.

2) System, project, and Coordinated Entry performance report cards for each actively funded project and the CoC system must be produced and submitted to the Data Committee and Performance and Ranking Committees as outlined in the procedures below.

   a) System Performance Report cards must include the following components, as defined by HUD:
      i) Measure 1: Length of Time Persons Remain Homeless
      ii) Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness
      iii) Measure 3: Number of Homeless Persons
      iv) Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects
      v) Measure 5: Number of persons who become homeless for the 1st time
      vi) Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

   b) Project Performance Report card must include each of the system performance measures stated above (Measures 1 through 5, and 7), and the following components:
      i) HUD Data Quality (Report ID: 257727)
      ii) Percent of entries from Coordinated Entry (If applicable)
      iii) Average VI-SPDAT Score of heads of households accepted into the program
      iv) Utilization Rate (If applicable)
      v) The Extent to which Persons who are assisted with prevention resources become homeless. *(Prevention Programs Only)*

   c) Coordinated Entry (CE) performance report cards must be produced and submitted to the Data Committee at least quarterly, coinciding with the implementation of CE data standard by HUD
      i) CE report cards must include the following components:
      ii) Number of persons referred to shelter and permanent housing
      iii) Time on Connect List before referral to housing
      iv) Rate of match and mismatched referrals
      v) Rate of inventory vacancies
      vi) HUD Data Quality (Report ID: 257727)

   d) All reports outside of regularly scheduled reporting (referred to as ad hoc reports) for the purpose of identifying program or agency performance, providing information, and/or raising community awareness shall be requested using the standard reporting request form.

   e) All ad hoc reports must be requested at least seven business days prior to report deadline.
      i) Requests for ad hoc reports will be prioritized according to the following priorities:
         (1) Reports that impact existing funding
         (2) Reports that impact new funding opportunities
         (3) Reports that are required by agency boards or administrative bodies (i.e. Board of County Commissioners or County Administration)
         (4) Reports for outside entities (i.e. local colleges for research, state or local agencies – not related to funding)
         (5) All other reports

   f) Exceptions may be considered by the CoC Manager.

1.3. Participating Agency and User Management

Policy:

1) The Lead Agency must maintain agency and user agreements with partner agencies and their end users that
   a) Require agencies and their end users to comply with all CoC, Federal, and State Policies, Procedures, and legislation
   b) Detail the Agency's obligations while using the HMIS, including penalties for non-compliance
   c) Require that agencies will accept referrals through Coordinated Entry, and
   d) Require that agencies and their end users comply with the requirements of participation in the HMIS.

Procedure:

2) The Lead Agency will administer Partner Agency and User access to HMIS as follows:
   a) All HMIS end users and agency administrators must sign a CSN User Responsibility Statement
   b) The Lead Agency must provide copies of all CSN User Responsibility Statements and Participating Agency Agreements to the Data Committee for review and consideration during annual monitoring.
   c) The Lead Agency will deactivate inactive users as needed

1.4. Training

Policy:

1) **Policy:** The Lead Agency will be responsible for creating, maintaining, and administering all HMIS training.

Procedure:

2) The Lead agency will administer training as follows:
   a. At least one HMIS basic training must be held every six months.
   b. At least one HMIS agency administrator training must be held every six months.
   c. Project specific trainings must be held before the launch of a new project, and at least one refresher course must be attended by end users annually
   d. All project specific trainings must include a review of the Universal Data Elements and Project Specific Data Elements
   e. All HMIS basic trainings must include a review of privacy and security protocols, and all applicable policies and procedures.
   f. Training attendance must be logged via sign-in sheet to ensure agency administrators and end users are compliant with training requirements.
   g. The Lead Agency must provide copies of training protocols and training logs to the Data Committee for review and consideration during annual monitoring.
   h. New users must attend HMIS training within thirty days of account creation

1.5. Stakeholder Feedback

Policy:

1) Feedback from end users, agency administrators, and Partner agencies shall be solicited not less than one time annually by the lead agency in coordination with the Data Committee

Procedure:

2) The Lead Agency will solicit stakeholder feedback as follows:
    a) Feedback will be solicited through one of the following methods:
        i) Online survey
        ii) Focus Group
        iii) CoC General Membership Meeting
3) Feedback must be documented and provided to the data committee for review and consideration in HMIS monitoring, not less than one time annually.

1.6. HMIS Vendor Selection and Engagement

Policy:

1) The CoC Governing Board, Lead Agency, and the Data Committee will work collaboratively to select and engage an HMIS Vendor.

Procedure:

2) The HMIS lead shall complete a HUD HMIS Software checklist not less than once every three years to be reviewed by the data committee. Based on the review, the Data Committee may recommend a solicitation for HMIS vendors.
3) A solicitation for HMIS vendors that meet all HUD requirements, may be voted on by the CoC Governing board not less than once every three years.
    a) Upon the recommendation of the CoC Governing Board, the lead agency shall solicit, evaluate, and negotiate proposals from HMIS vendors.
    b) A comprehensive Service Provider agreement must be executed with the selected HMIS vendor.
        i) Service provider agreement must be an annual agreement with the option for two additional annual renewals.
        ii) Service Provider agreement must outline the following requirements within the scope of work.
            (1) Compliance with all applicable HUD Data Standards, HIPAA, and any and all other relevant regulations
            (2) Terms for data hosting and storage
            (3) Terms for service/ technical support
            (4) Terms for vendor-provided training
            (5) Terms for reporting specifications and support
            (6) Terms for managing the number of agencies, users, and users that may be logged in concurrently
            (7) Termination/ Cancellation polices for both parties

(8) Terms outlining data ownership and return in the event of contract termination.
(9) Terms requiring a Disaster Recovery plan

1.7 Security, Data Quality and Data Sharing

Policy:

1. The Lead Agency will ensure data security in the HMIS; review and edit security policies, regulate the sharing of personal identifying information (PII), and work with Agency administrators to ensure partner agency compliance with all security policies.

Procedure (Data Sharing):

2. The Lead agency shall manage requests for information as follows: Request for information sharing and associated agreements must be discussed with the data committee and shall only be executed if in the best interest of the CoC.

a) De-identified information may be shared:
    i) With state and federal agencies as required by contract
    ii) With the Data Committee, CoC Governing board and partner agencies, as outlined in these policies and procedures
    iii) With Lee County Government, as requested
    iv) With Press/Media with the express written permission of the Director of the Lead Agency
    v) With other non-profit and government agencies as requested provided such data sharing is in the best interest of the CoC, at the discretion of the lead agency. Data shared in the interest of the CoC may be in the best interest of the CoC if they meet the following criteria:
      (1) Increase access to data regarding clients shared across systems (i.e. physical health care systems, jail or prison systems, behavioral health care systems, school systems, etc.)
      (2) Increase access to housing and/or service resources
      (3) Improve the CoC's ability to ensure homelessness is rare, brief, and one-time
b) Identifying information may <u>only</u> be shared:
    i) Between partner agencies within HMIS with the express consent of all users being identified.
    ii) With law enforcement for law enforcement purposes pursuant to a lawful subpoena, court order, or any other order that legally compels the disclosure of identifying information.

Procedure (Security Planning):

c) The Lead Agency will maintain a Data Security Policy and Security Plan in collaboration with the HMIS vendor to be reviewed by the Data Committee in advance of annual monitoring.
d) The Security Plan must include, at minimum
    i) Minimum End User Machine requirements, including anti-virus software and Internet connection protocols
    ii) Account and Password Protocols
    iii) Inactive User Policy
    iv) Workstation Security
    v) Security Violation policies

Procedure (Data Quality Planning):

e) The Lead Agency will draft, update, and submit a data quality plan to the Data Committee for approval in advance of annual monitoring.
    i) The Data Quality Plan must include, at minimum
        (1) Minimum standards (thresholds) for timeliness, completeness, and accuracy of data entered into the HMIS
        (2) Implementation and oversight plans

2. Data Committee

2.1. Data Quality Verification

Policy:

1) The Data Committee will review project, agency, Coordinated Entry, and system level data quality reports not less than one time per quarter.
2) Data quality reports shall be submitted to the CoC Governing Board for review not less than one time annually.

Procedure:

3) The Data Committee will review submittals from the Lead Agency quarterly to ensure the following:
    a) Data quality will be reviewed using quarterly system, project, and coordinated entry performance reports to identify, prioritize, track, and resolve critical data issues.

    b) Data quality will be reviewed on all HUD required reports including, but not limited to, the Point in Time Count, Housing Inventory Count, System Performance Measures, and Longitudinal System Analysis.

    c) A Data Quality Plan and Data Quality Thresholds will be established and updated not less than one time annually.

    d) The Data Committee shall update and submit a Data Quality Plan including Data Quality Thresholds to the CoC Governing Board not less than one time annually.

2.2. HMIS Monitoring and System Evaluation

Policy:

1) The Data Committee will conduct annual monitoring of the HMIS and the HMIS Lead Agency, and review data to evaluate the CoC on a system level.

Procedure:

2) HMIS and Lead Agency Monitoring will be conducted as follows:
    a. The monitoring will review of the following system elements:
        i.   System Management and Security
        ii. Reporting
        iii. User Management
        iv. Training
        v.   Stakeholder Feedback

      vi.   HMIS policies and procedures

3) System Evaluation will consist of a review of stakeholder feedback, HMIS partner agency compliance, system level data, and performance measure as follows:

    a. The committee will assist the HMIS Lead Agency in gathering stakeholder feedback through the formulation of surveys, facilitation of focus groups, and/or attendance at stakeholder meetings.

    b. All provider agency violations and grievances shall be submitted to, and reviewed and addressed by the committee.

    c. Trends relating to seasonal, racial, ethnic, industry, and geographic characteristics of homelessness in Lee County will be identified through regular review of project and system level reports.

    d. Data, evaluation, performance measurement and research will be provided to guide system design, planning, and funding.

3. Participating Agencies

3.1. Security and Privacy

Policy:

1) Partner Agencies are required to comply with all security and privacy protocols detailed herein. Failure to comply with such policies may result in disciplinary action including termination of contracts, severing of agency access to the HMIS, and referral to law enforcement if such noncompliance is of a criminal nature.

Procedure:

2) Each agency must establish and maintain internal security and privacy procedures that are consistent with and inclusive of CoC policies and procedures. Such policies must ensure and monitor compliance with applicable HMIS agreements and security and privacy requirements within that agreement, including enforcement of sanctions for noncompliance.

3.2. Referrals

Policy:

1) **Policy:** All Partner Agencies must accept referrals for housing and/or services through Coordinated Entry in HMIS unless otherwise specified in that agency's Agency Agreement.

Procedure:

2) Referrals for services will be conducted in HMIS's secure environment. If an HMIS referral cannot be completed for any reason, any email communication regarding specific clients must refer to the client's anonymized ID (in CSN, the "CardID")

    a) Each Participating Agency shall designate and monitor an email address to receive email notifications generated by the HMIS.

    b) Participating agencies are required to record in HMIS whether each client referred to their agency was linked with services in the HMIS Referral screen

4. Agency Administrators

4.1. Training

Policy:

1) Each agency administrator must attend one in-person HMIS agency administrator training with the HMIS Lead Agency annually.

Procedure:

2) Training for agency administrators will consist of:
    a. Training in running and analyzing program level reports
    b. Data quality and security management protocols
    c. Review of all applicable policies and procedures
    d. Review of Performance measures associated with each agency's programs

4.2. Data Quality

Policy:

1) Data quality reports must be run and reviewed for all HMIS programs not less than once every 30 days.

Procedure:

2) Data quality errors in excess of the thresholds allowable in the Data Quality Plan must be addressed within 30 days.

4.3. Privacy and Security

Policy:

1) At least once per month the Administrator shall review end-user access and data entry into HMIS to ensure activities within the system are consistent with privacy and security protocols discussed here within.
    a) Any discrepancies that appear to be a breach of privacy or security shall be reported in writing to the HMIS lead agency immediately.

5. End Users

5.1. Training

Policy:

1) Each end user must attend at least one in-person or virtual HMIS basic training with the HMIS Lead Agency per year. Basic training includes the following:
    a. Data quality and security
    b. Homeless and Disabling condition definitions
    c. Coordinated Entry
    d. Review of all applicable policies and procedures

5.2. Privacy and Security

Policy:

1) End users must adhere to all applicable laws, as well as all applicable policies and procedures.

Procedure:

2) All end users must:

      a. Adhere to HMIS and Agency Policies and Procedures
      b. Protect HMIS and Agency data and information
      c. Prevent unauthorized disclosure of data
      d. Report security violations to Agency Administrator or HMIS Lead Agency
      e. Remain accountable for all action undertaken with his/her user name and password
      f. Protect HMIS and Agency data and information
      g. Prevent unauthorized disclosure of data
      h. Report security violation to Agency Administrator or HMIS Lead Agency
      i. Remain accountable for all action undertaken with his/her user name and password

6. References

- 24 CFR 578
- 24 CFR 576
- 24 CFR 92
- HUD Programs HMIS Manuals
  - VA
  - HOPWA
  - COC
  - ESG
  - PATH
- HUD Data Standards FY 2020
- Lee County HMIS Data Quality Plan
- CSN User Responsibility Statement
- HMIS Privacy Policy