

TX – 601 Continuum of Care
Policies and Procedures
For
Homeless Management Information System (HMIS)

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Background & History

A Homeless Management Information System (HMIS) is an information system designated by a local Continuum of Care (CoC) to comply with the requirements of [CoC Program Interim Rule 24 CFR 578](#). It is a locally administered data system used to record and analyze client, service, and housing level data for individuals and families who become or are at risk of homelessness. HMIS is used to aggregate unduplicated data across projects in a community, which is used to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national.

In 2001, Congress instructed the U.S. Department of Housing and Urban Development (HUD) to take measures to improve available data concerning homelessness in the United States. In response, HUD mandated all Continuum of Care regions to implement region-wide databases that would provide an unduplicated count of clients served. Out of this directive came the Homeless Management Information System (HMIS), a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance service agencies and stores that data in a centralized database for analysis.

The HMIS Data Standards (established by publication in the [HMIS Data and Technical Standards Final Notice](#), [HMIS Data Standards- Data Dictionary](#), and [HMIS Data Standards Manual](#)) provide communities with baseline data collection requirements developed by federal partners. The HMIS data standards and program specific data manuals are updated and published routinely to provide funder specific guidelines.

HMIS is now used by federal partners and their respective programs in the effort to end Homelessness, including:

- U.S. Department of Health and Human Services (HHS)
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Veterans Affairs (VA)

In the TX-601 Continuum of Care Governance Charter, the CoC established an HMIS Committee, an official committee of the CoC Board of Directors, and designated Tarrant County Homeless Coalition as the HMIS Lead. The HMIS Committee is responsible for all administrative and oversight functions of the HMIS. The committee creates all policy and procedures for the CoC Board to approve and maintains a working relationship with the designated HMIS Lead Agency. The committee is responsible for the selection and ongoing review of the HMIS software and related tools.

Tarrant County Homeless Coalition is responsible for the day-to-day management of the HMIS system, including system maintenance, system configuration, compliance, technical assistance, and end user training. Contributing organizations are responsible for ensuring all users are trained on HMIS systems and receive ongoing support as needed, ensuring all data is input into the system per the CoC established guidelines.

The CoC selected Efforts to Outcomes “ETO,” as its formal HMIS platform. ETO HMIS is an online database used by organizations within TX-601 who provide services to persons experiencing homelessness or are at-risk of homelessness. It records demographic and service usage data and produces an unduplicated count of the people using those services. As an enhancement to the traditional HMIS system, the CoC authorized and implemented the Green River software. Green River serves as a third-party data warehouse platform that can integrate data across HMIS systems as well as

across service sectors. The CoC utilizes Green River to integrate data, automate coordinated entry functions, and easily identify performance trends and data integrity issues.

CoC-wide HMIS access can serve as a strategic advantage for service providers. The HMIS software allows multi-level client data sharing between organizations, as well as client case coordination and electronic referrals. Localized policies work to prevent service duplication and enable collaboration between various homeless service providers, while protecting and limiting access to sensitive data. Additionally, ETO conforms to the standard data collection and reporting functionalities, and includes bed management, performance measurement tools, required and ad-hoc reporting, customization options, etc.

Designating an HMIS Lead

The CoC Board reviews recommendations for the HMIS Lead every 10 years. The HMIS Governance Committee is responsible for providing recommendations for the CoC Board's vote. The HMIS Governance Committee completes an open competition every 10 years to designate the HMIS Lead. The competition is posted by RFP on the CoC website and includes scoring criteria for applicants. The competition follows standard procurement protocol to seek, evaluate, and recommend an HMIS Lead. The HMIS Governance Committee meets to review applicants and votes on recommendations to the CoC Board. The CoC Board votes to approve the HMIS Governance Committee's recommendations for HMIS Lead. The HMIS Lead enters a contract with the CoC.

The HMIS Governance Committee may also vote to re-procure the HMIS Lead agency if the current designated Lead does not fully implement the terms of their contract, does not provide satisfactory services, does not meet the below HMIS policies and procedures, or fails to meet HUD HMIS standards.

HMIS ROLES AND RESPONSIBILITIES

TX-601 CoC Board: CoC HMIS Governance Committee

- Project direction and guidance, including governance policy and procedure
- Approval of project forms and documentation
- Annually review all policies pertaining to HMIS Operations, including:
 - Data Quality Management Plan
 - End User Agreements
 - HMIS Privacy Policy
 - HMIS Security Plan
 - Governing HMIS Policies and Procedures

HMIS Lead Responsibilities: Tarrant County Homeless Coalition

- Provide 24 hour access to the CoC HMIS system, ETO, via internet connection at <https://secure.etosoftware.com/>
- Provide Privacy documentation, release forms and other agreements that may be adopted or adapted in the local implementation of HMIS
- Provide initial web-based and in-person (when permissible) group end-user trainings and annual updates for Agency Site Administrator Staff regarding use of HMIS software, with the

- expectation that the Agency will convey information to all Agency end-users
- Provide basic user support and technical assistance. Access to this basic support will typically be available from 8:30 AM to 4:30 PM Monday through Friday, except federal holidays
- Execute HMIS participation agreements
- Monitor compliance with applicable HMIS standards Quarterly
- Maintain and update as needed the files for HMIS software to include software agreements, HUD Technical Submissions, HUD executed agreements and Annual Progress Reports
- Annually submit HUD required reporting, including the LSA, System Performance Measures, HIC, PIT, any data required for the annual NOFA, and others as required
- Develop and maintain HMIS agency files to include original signed participation agreements, original signed user license agreements, and all other original signed agreements pertaining to HMIS
- Review national, state, and local laws that govern privacy or confidentiality protections and make determinations regarding relevancy to existing HMIS policy
- Review of HMIS program descriptors to ensure that participating agency programs are using HMIS accurately
- Conduct unduplicated accounting of homelessness annually
- Maintain a working knowledge of all HMIS data and technical requirements through training opportunities, networking, and relevant collaborations
- Support non-HMIS programs including the integration of EPIC with Green River
- Support domestic violence agencies required to use a comparable database by ensuring database is compliant with most up to date data standards and reporting capabilities and data quality metrics
- Monitor the HMIS software vendor contract with Social Solutions
- Administer and manage the HUD CoC HMIS grant

HMIS Participating Agency Responsibilities

- Adopt and implement all Privacy documentation, release forms, and other agreements pertinent to the local HMIS
- If the Agency utilizes a separate third-party software system as an HMIS, the Agency will share client information in a manner to be determined based on the prevailing software systems in use at the time
- Comply with all applicable agreements
- Execute and manage HMIS User License Agreements with all staff who have HMIS access
- Comply with the HMIS Standards as appropriate
- Accurately enter all required data into the HMIS system, including accurate and timely information into housing, where applicable
- Agencies required to use a comparable database must ensure all data and reporting are current with the most recent HUD Data Standards and provide data to the HMIS Lead as requested
- Non-participating Agencies, otherwise known as non-CoC funded Agencies, are not required to maintain HUD Data Requirements, but are encouraged to maintain data collection requirements and reporting capability up to date with the prevailing standards
- Ensure that all staff utilizing ETO receive initial and ongoing HMIS training provided by the HMIS Lead

System Administration

It is the responsibility of the HMIS Lead to work with HMIS staff to implement an HMIS operations plan to ensure all responsibilities are fulfilled in a timely manner. HMIS will maintain a calendar of events, such as report due dates, training dates, monitoring dates, data committee meeting dates, and annual recertification due dates to support ongoing and cyclical HMIS operational activities.

The HMIS Lead must also ensure that all technical configurations are in order, including:

- Ensure the HMIS network infrastructure is up and running
- Ensure hosting, storage, and back-up procedures are completed in accordance with CoC expectations (if a vendor function, the system administrator should verify)
- Ensure technical requirements are incorporated into planning for special software projects
- Ensure the existence of current software technical documentation, such as system configuration and a local HMIS specific data dictionary
- Assess and conduct HMIS software performance for improvement
- Work with HMIS staff and software vendor to develop and implement custom project work plans
- Manage HMIS software updates
- Customize/configure workflows within the capacity of the software, as authorized by the CoC

Participation Fees

TX-601 charges an annual fee for HMIS participation, as authorized by the CoC. Fee Schedule can be found in Appendix C.

HMIS Agency Participation Agreement

The Executive Director of any Participating Agency shall follow, comply, and enforce the HMIS Agency Participation Agreement (Appendix A). The Executive Director must sign an HMIS Agency Participation Agreement before being granted access to HMIS. Signing of the HMIS Agency Participation Agreement is a precursor to training and user access. An original signed HMIS Agency Participation Agreement must be presented to the HMIS staff before any program is implemented in the HMIS. After the HMIS Agency Participation Agreement is signed, HMIS staff will train end users, and subsequently issue a username and password, to utilize the HMIS system. End users must be trained on the HMIS system and other requirements, such as the Health Insurance Portability and Accountability Act (HIPAA), Personally Identifiable Information (PII), Protected Personal Information (PPI), and ethics, annually.

HMIS User License Agreement

End user of any Participating Agency shall follow, comply, and enforce the HMIS User License Agreement (Appendix B). Before given access to HMIS, the end user must sign an HMIS User License Agreement. HMIS staff will provide the end user a HMIS User License Agreement for signature after completing required training. HMIS staff will collect and maintain HMIS User License Agreements of all end users.

Data Collection Requirements

Participating Agencies will collect and verify the minimum set of data elements for all clients served by their programs within the timeframe outlined in the HMIS Data Quality Plan (Appendix D). During client intake, end users must collect all the universal data elements and program-specific data elements set forth in the prevailing [HMIS Data Standards Manual](#).

End users of any Participating Agency must record the Program Entry and Exit Date and any required new client / exiting client data into HMIS no later than the following for each program type:

- Emergency Shelters: One (1) workday (24 work hours after the check-in/check-out time)
- Transitional and Permanent Supportive Housing Programs: Three (3) workdays
- Rapid Re-Housing and Homelessness Prevention Programs: Three (3) workdays
- Outreach Programs: Three (3) workdays
- Supportive Services Only Programs: Three (3) workdays

Disaster Recovery Protocol

The HMIS Lead will work with the software vendors to ensure the presence of disaster protection and recovery plans for data hosting sites, to include back-up sites and accessibility protocols. The HMIS Lead is also responsible for developing a local disaster recovery protocol for System Administrators regarding any HMIS documents and agreements. This document is included below in Appendix E.

TECHNICAL SUPPORT

A primary function of the HMIS Lead is to develop and establish an HMIS support structure and helpdesk protocol to respond to technical queries and to assist end users. Additionally, HMIS will manage all communications with HMIS software vendors to report issues and to plan and implement software upgrades. HMIS staff will provide a reasonable level of support to Participating Agencies via email, phone, and/or remote.

1. HMIS Users should first seek technical support from their agency's HMIS Project Lead
2. If more expertise is required to further troubleshoot the issue, agency HMIS expert or HMIS User should submit request to: HMISTeam@ahomewithhope.org. Refrain from sending email correspondence directly to the HMIS Support Team to ensure a timely response
3. Basic user support and technical assistance will be available from 8:30 AM to 4:30 PM Monday through Friday, excluding holidays
4. Provide issue replication details if possible (or help recreate the problem by providing all information, screenshots, reports, etc.) so HMIS staff can recreate problem if required
5. The HMIS staff will try to respond to all email inquiries and issues within one (1) business days, but support load, holidays and other events may affect response time
6. The HMIS staff will submit a ticket to software vendor if progress is stalled or needs a higher level of resolution

At a minimum of once per year, HMIS will facilitate a feedback forum from HMIS front end users. This forum will typically be in the form of an electronic survey.

HMIS SECURITY

The CoC is responsible for establishing protocol, procedures, and security standard monitoring plans. These policies will be inclusive of HMIS related hard copy documents, such as completed intake forms,

printed By Name Lists, printed documents with Personal Identifying Information (PII), and filing systems used to house these documents. Housing programs may or may not use the following hard copy documents: client consent forms, proof of income forms, and lease agreements. Housing programs are encouraged to use online forms to decrease or eliminate the need for hard copies. Tarrant County Homeless Coalition does not utilize hard copy documentation except for Agency Agreements and related documents. Refer to HMIS Agency Participation Agreement in Appendix A and CoC HMIS End User Security and Privacy Agreement in Appendix B.

User Authentication

Only users with a valid username and password combination can access HMIS. The HMIS staff will provide unique username and initial password for eligible individuals after completion of required training and signing of the HMIS User License Agreement. Users will only be allowed to gain access when the Participating Agency is in good standing. For the Participating Agency to be in good standing, they must be up to date on all required fees. The Participating Agency will determine which of their employees will have access to HMIS. User access will be granted only to those individuals whose job functions require legitimate access to the system.

Proposed end users must complete the required training and demonstrate proficiency in use of system by completing an online systems test. Proposed end users must sign the HMIS User License Agreement stating that they have received training, will abide by the Policies and Procedures, will appropriately maintain the confidentiality of client data, and will only collect, enter, and retrieve data in the system relevant to the delivery of services to people.

HMIS staff will be responsible for the distribution, collection, and storage of the signed HMIS User License Agreements. The Participating Agency is required to notify HMIS staff, within 24 hours, when an end user leaves employment with the agency or no longer needs access. Users not logging into HMIS for more than 45 days will be locked out due to non-activity. Access will be reauthorized after the user requests access restored and completes the end user training when appropriate. HMIS Staff will routinely monitor audit logs for unauthorized access to client records and report deviations from security protocol according to an established channel of communication. Agency Site Administrators and any end user with knowledge of unauthorized use of the system are required to report the information to HMIS Staff as soon as the breach is discovered.

Passwords

Each end user will have access to HMIS via a username and password. End users will maintain password confidentiality. HMIS staff will provide new end users a unique username and temporary password after initial required training is complete. Sharing of usernames and passwords is a breach of the HMIS User License Agreement as it compromises the security to clients. End users will be required to create a permanent password that is between eight and one-hundred and twenty-eight characters in length. It must also contain characters from the following four categories: (1) number (0 through 9) and (7) capital or lowercase alphanumeric characters. The password does not need to contain non-alphanumeric characters. End users may not use the same password consecutively and may only use the same password once a year. Access permission will be revoked after the end user unsuccessfully attempts to log on five times, which is the maximum attempts permitted. The end user will be unable to gain access until the HMIS staff reset their password.

Hardware Security Measures

All computers and networks used to access HMIS must have virus protection software and firewall installed. Virus definitions and firewall must be regularly updated. These standards are intended to:

- Implement technical safeguards to protect HMIS data, assuring devices used for HMIS are password protected, have up-to-date antivirus software, have locking screensavers, have individual or network firewalls, and physical device locations are secure
- Ensure that the HMIS software is configured correctly to ensure compliance with CoC established security policies and procedures
- Ensure security of data during any electronic transfer of data

Security Review

HMIS staff will complete an annual security review to ensure the implantation of the security requirements for itself and Participating Agencies. The security review will include the completion of a security checklist ensuring that each security standard is implemented.

Security Violations

Any end user found to be in violation of security protocols will be sanctioned accordingly. Sanction may include but are not limited to suspension of system privileges and revocation of system privileges. End users are obligated to report suspected instances of noncompliance and/or security violations to their agency and/or HMIS staff as soon as possible.

HMIS PRIVACY

The HMIS Governance Committee is responsible for establishing policies, procedures, and a monitoring plan pertaining to Privacy Notice; client authorization form (Release of Information); and electronic and paper documents containing personal identifying information (i.e. intake forms, assessment tools, By Name Lists, referral forms, etc.). HMIS staff must ensure that the HMIS software is configured correctly to ensure compliance with CoC established privacy policies and procedures and conduct monitoring for compliance with established policies, procedures, plans, and report deviations from privacy protocol according to an established channel of communication.

Participating Agencies must obtain informed, signed, or verbal consent prior to entering any client personal identifiable information into HMIS. Services will not be denied if a client chooses not to include personal information. Personal information collected about the client should be protected. Each Participating Agency and end user must abide by the terms in the HMIS Agency Participation Agreement (Appendix A) and HMIS User License Agreement (Appendix B). Client must sign the Authorization to Disclose Client Information form (Appendix F) or consent of the individual for data collection may be inferred from the circumstances of the collection. Clients that provide permission to enter personal information allow for Participating Agencies within the continuum to share client and household data. If client refuse consent, the end user should not include any personal identifiers (First Name, Last Name, Social Security Number, and Date of Birth) in the client record. For clients with refused consent, end user should include a client identifier, such as a client profile number, to recognize the record in the system. However, user should strive for client anonymity.

Each of the HMIS 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 so long as they do not conflict with approved uses and disclosures. See below for detailed information on Personally Identifiable Information and Protected Personal Information.

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

Participating Agencies shall uphold Federal and State Confidentiality regulations and laws that protect client records.

Approved Uses and Disclosures

Identifiable HMIS 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 call center operations, explicit oral consent
- Billing uses include functions related to payment or reimbursement for services. An example might include generating reports for fundraising purposes
- 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 Continuum's Strategic Plan

Unless a client requests that his/her record remains hidden, his/her primary identifiers will be disclosed to other HMIS agencies. This will allow agencies to locate the client within the HMIS system when the client comes to them for services. This will allow the Continuum to determine how many people are homeless in our region 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 (to include Covid-19)
- 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
- Uses and disclosures post-mortem to outside entities (i.e. family, law enforcement, etc.)

Aside from the disclosures specified above, a client's protected personal information will be disclosed only with his/her written consent. Client information will be stored with personal identifiers for a period of seven years from the time it was last modified. Beyond that point, client information will be retained only in a de-identified format.

Other Allowable Uses and Disclosures

Provided below are additional uses and disclosures of information allowable by HUD standards. It should be noted that these additional uses and disclosures are permissive and not mandatory (except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards). However, nothing in this standard modifies an obligation under applicable law to use or disclose personal information (Section 4.1.3, 2004 HMIS Data and Technical Standards).

A CHO may use or disclose PII when required by law to the extent that the disclosure complies with and remains within the boundaries of said law, in response to a lawful court order, court-ordered warrant, subpoena, or summons issued by a judicial officer, or a grand jury subpoena. A CHO must take immediate actions to notify TCHC about all legal disclosures. If uncertainty exists about the CHO's

authority to disclose, or the action is not specified in this document, the CHO may contact TCHC before approving any disclosure.

A CHO may, consistent with applicable law and standards of ethical conduct, use or disclose PII if:

- The CHO, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public
- The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat

A CHO must take immediate actions to notify TCHC about all legal disclosures. If uncertainty exists about the CHO's authority to disclose, or the action is not specified in this document, the CHO must contact TCHC before approving any disclosure.

A CHO may, consistent with applicable law and standards of ethical conduct, disclose PII to a law enforcement official under any of the following circumstances:

- In response to a request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PII disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics
- If the official is an authorized federal official seeking PII for the provision of protective services to the President or other authorized persons OR for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others)

All CHOs must comply with the baseline privacy requirements described here with respect to data collection limitations; data quality; purpose and use limitations; openness; access and correction; and accountability. A CHO may adopt additional substantive and procedural privacy protections that exceed the baseline requirements for each of these areas in its privacy notice. A CHO may maintain a common data storage medium with another organization (including but not limited to another CHO) that includes the sharing of PII. When PII is shared between organizations, responsibilities for privacy and security may be allocated between the organizations (Section 4.2, 2004 HMIS Data and Technical Standards). All CHO policies regarding privacy requirements must at a minimum include the criteria in this document. Additional requirements may be added at the discretion of each CHO.

HIPAA

The Agency will abide specifically with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and corresponding regulations passed by the U.S. Department of Health and Human Services. In general, the regulations provide consumers with new rights to control the release of medical information, including advance consent for most disclosures of health information, the right to see a copy of health records, the right to request a correction to health records, the right to obtain documentation of disclosures of their health information, and the right to an explanation of their privacy rights and how information may be used or disclosed. The current regulation provides protection for paper, oral, and electronic information.

The HMIS standards and the HIPAA standards are mutually exclusive. An organization that is covered under the HIPAA standards is not required to comply with the HMIS privacy or security standards, so long as the organization determines that a substantial portion of its protected information about homeless clients or homeless individuals is indeed protected health information as defined in the HIPAA rules.

HIPAA standards take precedence over HMIS because HIPAA standards are finely attuned to the requirements of the health care system; they provide important privacy and security protections for protected health information; and it would be an unreasonable burden for providers to comply with and/or reconcile both the HIPAA and HMIS rules. This spares organizations from having to deal with the conflicts between the two sets of rules. HIPAA rules are triggered by the type of entity managing the data rather than health information. HUD funded organizations participating in HMIS are not subject to HIPAA regulations. There are no data elements in HMIS that would require HIPAA compliance.

Protection of Client Privacy

The Agency will comply with all applicable federal and state laws regarding protection of client privacy as well as all policies and procedures established by TCHC pertaining to the protection of client privacy. Further, the Agency will comply specifically with federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2, regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal rules prohibit the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse cases.

Client Confidentiality

The Agency agrees to provide a copy of the TCHC CoC Data Privacy Notice to each consumer. The Agency will obtain each consumer's consent to collect data on the Client Consent of Data Collection (or an acceptable Agency-specific alternative) form. If consent is not given, then the Agency will enter consumer information as "anonymous". The Agency will provide a verbal explanation of the TCHC CoC HMIS and arrange for a qualified interpreter/translator in the event that an individual is not literate in English or has difficulty understanding the Data Privacy Notice or Client Consent of Data Collection form. The Agency acknowledges that clients who choose not to consent to release of information cannot be denied services for which they would otherwise be eligible. The Agency will secure a completed Client Revocation of Release of Information Consent Form (REV) for these clients.

The Agency will not solicit or enter information from clients into the TCHC CoC HMIS databases unless it is essential to provide services or conduct evaluation or research. The Agency will not divulge any confidential information received from the TCHC CoC HMIS to any organization or individual without proper written consent by the client on the Client Release of Information Consent Form (ROI) unless otherwise permitted by applicable regulations or laws. The Agency agrees to place all Client Release of Information Consent forms related to the TCHC CoC HMIS in a file to be located at the Agency's business address and that such forms will be made available to TCHC for periodic audits. The Agency will retain these TCHC CoC HMIS-related Release of Information Consent forms for a period of 7 years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.

The Agency will ensure that all persons who are issued a User Identification and Password to the TCHC CoC HMIS System abide by the Participation Agreement, including all associated confidentiality provisions. The Agency will be responsible for oversight of its own related confidentiality requirements. The Agency agrees that it will ensure that all persons issued a User ID and Password will complete a formal training provided by TCHC on privacy and confidentiality and demonstrate mastery of that information, prior to activation of their User ID. The Agency acknowledges that ensuring the confidentiality, security and privacy of any information downloaded from the system by the Agency is strictly the responsibility of the Agency.

Personally Identifiable Information and Protected Personal Information

The information below summarizes client data categories and related notification/consent rules that relate to each data category.

| Client Data Categories | Notification, Consent and Data Sharing Procedures |
|--|--|
| <u>Primary Identifiers:</u> <ul style="list-style-type: none"> • Name and Aliases • Birth Date • Gender • Social Security Number • Family/Relationship Information • Client Veteran Status | <p><u>Open Client Record:</u> If the client does not ask to hide his/her identifiers, the primary identifiers will be available to all HMIS users in the Client Search to locate an existing client. None of the other client information will be viewable, except as described below</p> <p><u>Closed Client record:</u> If a client asks to hide his/her primary identifiers, the record will appear on the Client Search List only for the originating agency. It will be hidden to all other agencies. Some system-level users will have access to hidden records for system administration purposes</p> |
| <u>General Client Information (Demographics, Entry/Exit, and Service Transactions):</u> <ul style="list-style-type: none"> • Ethnicity • Race • Services Provided • Program Enrollment (Entry/Exit) | <p><u>Open Assessment:</u> With a signed release of information (ROI), these data can be shared with HMIS users from partner agencies by opening/unlocking the Demographics assessment and relevant Entry/Exit and Service Transactions</p> <p><u>Closed Assessment:</u> If written consent is not provided, this information is accessible only within the originating agency and some system-level users for system administration purposes</p> |
| <u>Protected Information:</u> <ul style="list-style-type: none"> • Housing History • Income/Benefits/Employment • Disability Information • Mental Health Assessment • Substance Abuse Assessment • HIV/AIDS Information • Domestic Violence Information | <p><u>Protected Information:</u> Generally, this information is available only within the originating agency to users that have an authorized access level and to authorized, system-level users for system administration purposes. Any other sharing of this data should be limited to specific Partner Agencies and requires signed consent from the client</p> |

Privacy and HMIS

Disclosures required by law: A CHO may use or disclose PPI when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law. Disclosures to avert a serious threat to health or safety: Uses and disclosures to avert a serious threat to health or safety. A CHO may, consistent with applicable law and standards of ethical conduct, use or disclose PPI if: (1) the CHO, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat. Any information maintained by or for a member of the Tarrant County Homeless Coalition or other Covered Homeless Organization about a living homeless client or homeless individual which:

- Identifies, either directly or indirectly, a specific individual
- Can be manipulated by a foreseeable method to identify a specific individual; or
- Can be linked with other available information to find a specific individual (Section 4.1.1, 2004 HMIS Data and Technical Standards)

A CHO will enter in to HMIS a required set of data variables for each client, including all universal and program specific data elements, which are detailed in the HUD HMIS Data and Technical Standards (see Appendix A for list of Data Elements). All HMIS End Users are trained in the appropriate and accurate procedures for entering PII into HMIS. This training is provided by the Tarrant County Homeless Coalition Department of Information Services.

Data Quality

The CoC will establish and maintain the local data quality policies. The HMIS Governance Committee will be responsible for development and maintenance of a robust data quality improvement and maintenance plan. This document can be found below in Appendix D.

The HMIS Staff is responsible for the testing, monitoring, validation, and verification that the HMIS software can collect required data elements. HMIS staff will monitor data quality in accordance with CoC established Data Quality Management Plan and work with end users to identify and resolve data quality issues. Participating agencies will also be responsible for monitoring and reviewing data quality as identified in the Data Quality Management Plan. HMIS staff will determine the most appropriate protocol needed to perform data integrity maintenance, as authorized by the CoC. HMIS staff will also establish, maintain, and monitor data and hardware disposal policies and procedures.

| | |
|----------------------------|--|
| ID Data Elements | All required as identified in the HUD Data Standards Manual |
| ID Frequency of Review | Monthly |
| ID Method of Review | HMIS Reporting |
| ID Method of Correction | Communication to program management to correct, provide user resources, and timeframes |
| ID Method of Communication | Emails, community dashboards with system and program level errors |

| | |
|-----------------------------|---|
| ID Method of Training | Online, in-person, and one on one technical assistance as needed |
| ID Method of Non-Compliance | Non-compliance will be highlighted in community dashboards and performance improvement plans. Additionally, user access will be revoked and have a subsequent impact on future funding competitions |
| ID Acceptable Levels | Maximum of 2% error rate |

All data entered into HMIS must meet data quality standards. Participating Agencies will be responsible for their end users' quality of data.

Data Quality: Refers to the timeliness, completeness, and accuracy of information collected and reported in the HMIS.

Data Timeliness: End users must enter all universal data elements and program-specific data elements using the guidelines identified in the HMIS Data Quality Plan.

Data Completeness: All data entered into the system is complete.

Data Accuracy: All data entered shall be collected and entered in a common and consistent manner across all programs.

Participating Agencies must sign the HMIS Agency Participation Agreement (Appendix A) to ensure that all participating programs are aware and have agreed to the data quality standards. Upon agreement, Participating Agencies will collect and enter as much relevant client data as possible for the purposes of providing services to that client. All data must be corrected within 5 business days of notification from the HMIS staff.

Data Use and Disclosure

All end users will follow the data use Policies and Procedures to guide the data use of client information stored in HMIS. Data collection in this context refers to client data collected and entered upon enrollment into HMIS. Participating Agencies may use data contained in the system to support the delivery of services to homeless clients in the continuum. Agencies may use or disclose client information internally for administrative functions, technical support, and management purposes. Participating Agencies may also use client information for internal analysis, such as analyzing client outcomes to evaluate program effectiveness.

The vendor and any authorized subcontractor shall not use or disclose data stored in HMIS without expressed written permission to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes. The Service and License Agreement signed individually by the HMIS Lead Agency and vendor contains language that prohibits access to the data stored in the software except under the conditions noted above. More information is provided in the Personally Identifiable Information and Protected Personal Information section above.

Data Release

All HMIS stakeholders will follow the data release Policies and Procedures to guide the data release of client information stored in HMIS. Data release refers to the dissemination of aggregate or anonymous client-level data for the purposes of system administration, technical support, program compliance, and

analytical use. No identifiable client data will be released to any person, agency, or organization for any purpose without written permission from the client. Aggregate data may be released without agency permission at the discretion of Continuum. It may not release any personal identifiable client data to any group or individual.

Training

Each end user must complete the required New User Training prior to gaining access to HMIS. HMIS staff will develop and provide training to all end users as requested by program management as part of the CoC onboarding process. HMIS staff will also provide all required documentation and HMIS related materials to users at the time of training and throughout the year as needed, including HMIS Policy and Procedures and HMIS User Guides. HMIS staff will provide ongoing training on any system updates or enhancements throughout the year to impacted end users. HMIS staff will ensure that all end users are re-trained annually on the HMIS and comply with any HMIS related policies.

HMIS developed end user training will include training and orientation on regulations pertaining to a specific funding source, HMIS software data entry and capabilities, system security, privacy, and HMIS policies and procedures. Other topics will include report generation based on user need including: CoC Annual Performance Report, System Performance Measures, Emergency Solutions Grant Consolidated Annual Performance, and Evaluation Report, at a minimum.

Monitoring

HMIS Participating Agencies will be monitored once per calendar year to ensure compliance with all HUD and local requirements, as well as verify current agency end users, project descriptors, and inventory. This annual monitoring may be used to identify needed areas of additional training and as a factor in any local funding competitions. The HMIS Policy Self-Certification Checklist is included below in Appendix G.

HMIS Terminology

Audit Trail – Metadata attached to a participant’s record demonstrating all edits made.

Participation Intake – A point in an agency’s workflow when a participant is added to the HMIS.

Consumer – A participant receiving at least one service from an agency providing homeless services.

Continuum of Care (CoC) – an integrated collection of agencies serving the homeless.

Contributing HMIS Organization (CHO) – an organization who enters data into the HMIS.

Data Quality – data accuracy and completeness.

Data Standards – see HMIS Data and Technical Standards Final Notice.

De-identification – data about participants where all personal identifying information has been removed

Encryption – the process of encrypting data for the purposes of safe storage or transmission.

HMIS Participation Notice – posted notice at an intake centers explaining the how and why the HMIS Member Agency will collect the participant’s data.

Inferred Consent – consent inferred by the HMIS by the End-User as to a participant’s desire to participate in the HMIS.

Informed Consent – consent gathered after a participant has acknowledge as to his or her understanding of what information will be gathered and how it will be used.

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.

Program-specific Data Elements – data elements required to be collected for specific programs in HMIS.

Scan Cards – identification cards provided to participants for ease of data collection and entry into services.

Unduplicated Count – a count of participants where no two records represent the same participant.

Universal Data Elements – data elements required to be gathered by all participating HMIIS agencies.

Written Consent – a written and signed consent.

Appendix A



Fort Worth/Arlington/Tarrant/Parker County
Continuum of Care TX-601
Homeless Management Information System
Participation Agreement
Between
TCHC and
(Agency Name)

This agreement is entered into on (MM/DD/YYYY) between the Tarrant County Homeless Coalition, as lead agency for the Fort Worth/Arlington/Parker/Tarrant County Continuum of Care TX- 601, hereafter known as "TCHC," and (Agency name), hereafter known as "Agency," regarding access, use and sharing of data with the TCHC Continuum of Care Homeless Management Information System, hereafter known as the "TCHC CoC HMIS."

Introduction

The TCHC CoC HMIS (ETO Software), a shared human services database, allows authorized personnel at homeless and human service provider agencies throughout the Fort Worth/Arlington/Tarrant County Continuum of Care (CoC) to enter, track, and report on information concerning their own clients and to share information on common clients.

TCHC CoC HMIS goals are to:

- Improve coordinated care for and services to homeless persons in the CoC.
- Provide a user-friendly and high-quality automated records system that expedites client intake procedures, improves referral accuracy, and supports the collection of quality information that can be used for program improvement and service-planning, and

- Meet the reporting requirements of the U.S. Department of Housing and Urban Development (HUD) and the CoC.

In compliance with all state and federal requirements regarding client/consumer confidentiality and data security, the TCHC CoC HMIS is designed to collect and deliver timely, credible, quality data about services and homeless persons or persons at risk for being homeless.

TCHC Responsibilities to TCHC CoC HMIS Software users:

- Will provide the Agency 24-hour access to the TCHC CoC HMIS database systems, via internet connection.
- Will provide Privacy Notices, Client Release forms and other agreements that may be adopted or adapted in local implementation of TCHC CoC HMIS functions.
- Will provide both initial training and periodic updates to that training for core Agency Site Administrator Staff regarding the use of the software systems, with the expectation that the Agency will take responsibility for conveying this information to all Agency Staff using the systems.
- Will provide basic user support and technical assistance (i.e., general troubleshooting and assistance with standard report generation). Access to this basic technical assistance will normally be available from 8:30 AM to 4:30 PM on Monday through Friday (with the exclusion of holidays).
- Will not publish reports on client data that identify specific agencies or persons, without prior Agency (and where necessary, client) permission. Public reports otherwise published will be limited to presentation of aggregated data within the TCHC CoC HMIS databases. Publication practice will be governed by policies established by relevant committees operating at the TCHC CoC HMIS level for continuum-wide analysis and will include qualifiers such as coverage levels or other issues necessary to clarify the meaning of published findings.

Responsibilities of non-TCHC CoC HMIS Software User Agencies

The Agency will share with the TCHC CoC HMIS client data on all homeless programs run by the Agency operating within the Fort Worth/Arlington/Parker/Tarrant County Continuum of Care. If the Agency utilizes a different third-party software system as an HMIS, the Agency will share the client information in the required HUD CSV file format and transmit the data via ftp secured web portal by the 5th day of each month with data from the previous month.

Protection of Client Privacy

The Agency will comply with all applicable federal and state laws regarding protection of client privacy., specifically with federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2, regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal rules prohibit the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse cases.

The Agency will abide specifically with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and corresponding regulations passed by the U.S. Department of Health and Human Services. In general, the regulations provide consumers with new rights to control the release of medical

information, including advance consent for most disclosures of health information, the right to see a copy of health records, the right to request a correction to health records, the right to obtain documentation of disclosures of their health information, and the right to an explanation of their privacy rights and how information may be used or disclosed. The current regulation provides protection for paper, oral, and electronic information.

The Agency will comply with all policies and procedures established by TCHC pertaining to protection of client privacy.

Client Confidentiality

The Agency agrees to provide a copy of the TCHC CoC Data Privacy Notice to each consumer. The Agency will obtain each consumer's consent to collect data on the Client Consent of Data Collection (or an acceptable Agency-specific alternative) form. If consent is not given, then the Agency will enter consumer information as "anonymous".

The Agency will provide a verbal explanation of the TCHC CoC HMIS and arrange for a qualified interpreter/translator in the event that an individual is not literate in English or has difficulty understanding the Data Privacy Notice or Client Consent of Data Collection form (DC).

The Agency will not solicit or enter information from clients into the TCHC CoC HMIS databases unless it is essential to provide services or conduct evaluation or research.

The Agency will not divulge any confidential information received from the TCHC CoC HMIS to any organization or individual without proper written consent by the client on the Client Release of Information Consent Form (ROI) unless otherwise permitted by applicable regulations or laws.

The Agency agrees to place all Client Release of Information Consent forms related to the TCHC CoC HMIS in a file to be located at the Agency's business address and that such forms will be made available to TCHC for periodic audits. The Agency will retain these TCHC CoC HMIS-related Release of Information Consent forms for a period of 7 years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.

The Agency acknowledges that clients who choose not to consent to release of information cannot be denied services for which they would otherwise be eligible. The Agency will secure a completed Client Revocation of Release of Information Consent Form (REV) for these clients.

The Agency will ensure that all persons who are issued a User Identification and Password to the TCHC CoC HMIS System abide by this Participation Agreement, including all associated confidentiality provisions.

The Agency will be responsible for oversight of its own related confidentiality requirements.

The Agency agrees that it will ensure that all persons issued a User ID and Password will complete a formal training provided by TCHC on privacy and confidentiality and demonstrate mastery of that information, prior to activation of their User ID.

The Agency acknowledges that ensuring the confidentiality, security and privacy of any information downloaded from the system by the Agency is strictly the responsibility of the Agency.

Inter-Agency Data Sharing Agreements

The Agency is encouraged to share the maximum amount of client data with other Participating Agencies electronically through the HMIS Software Systems.

The Agency acknowledges that informed client consent is required before any basic identifying client information is shared with other Agency(ies) in the TCHC CoC HMIS. The Agency will document client consent on the TCHC CoC HMIS Client Release of Information Consent Form (ROI).

The Agency acknowledges that the Agency, itself, bears primary responsibility for oversight for all sharing of data it has collected via the TCHC CoC HMIS system.

The Agency agrees to place all Client Release of Information Consent forms related to the TCHC CoC HMIS in a file to be located at the Agency's business address and that such forms will be made available to TCHC for periodic audits.

The Agency will retain these TCHC CoC HMIS -related Release of Information Consent forms for a period of 7 years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.

The Agency acknowledges that clients who choose not to authorize sharing of information cannot be denied services for which they would otherwise be eligible.

Custody of Data

The Agency acknowledges, and TCHC agrees, that the Agency retains ownership over all information it enters into the TCHC CoC HMIS and the CoC retains ownership of the aggregation of all information in the database.

In the event that the TCHC CoC HMIS Project ceases to exist, Participating Agencies will be notified and provided reasonable time to access and save client data on those served by the Agency, as well as reporting, statistical and frequency data from the entire system. Thereafter, the information collected by the centralized server will be purged or appropriately stored.

Data Entry and Regular Use of TCHC CoC HMIS

The Agency will not permit User ID's and Passwords to be shared among users.

If a client has previously given the Agency permission to collect information and then chooses to revoke that permission on the Client Revocation of Consent of Release of Information form (REV), the Agency will contact the TCHC CoC HMIS immediately to properly disable access to the client information.

If the Agency receives information that necessitates a client's information be entirely removed from the TCHC CoC HMIS, the Agency will work with the client to complete a brief Delete Request Form, which will be sent to the TCHC CoC HMIS System Administrator for deactivation of the client record.

The Agency will enter all minimum required data elements as defined for all persons who are participating in services funded by the U.S. Department of Housing and Urban Development (HUD) Supportive Housing Program, Shelter + Care Program, or Emergency Solutions Grant Program, or Homeless Prevention Rapid Rehousing. These data elements may be found in the Federal Register/ July 30, 2004 / p. 45888 et. seq. or on the TCHC CoC HMIS Client Consent of Data Collection Form (DC).

The Agency will enter data in a consistent manner, and will strive for real-time, or close to real-time data entry, but no later than within three business days after a service or effort is provided to the client. If a User account is inactive for more than six weeks, the User account may be subject to reassignment to another agency.

The Agency will routinely review records it has entered in the TCHC CoC HMIS for completeness and data accuracy. The review and data correction process will be made according to TCHC CoC HMIS Policies and Procedures.

The Agency will not knowingly enter inaccurate information into the TCHC CoC HMIS.

The Agency will prohibit anyone with an Agency-assigned User ID and Password from entering offensive language, profanity, or discriminatory comments based on race, color, religion, national origin, ancestry, handicap, age, sex, and sexual orientation.

The Agency will utilize the TCHC CoC HMIS for business purposes only.

The Agency will keep updated virus protection software on Agency computers that access the TCHC CoC HMIS. (e.g. McAfee, Norton)

Transmission of material in violation of any federal or state regulations is prohibited.

The Agency will not use the TCHC CoC HMIS with intent to defraud the Federal, State, or local government, or an individual entity, or to conduct any illegal activity.

The Agency agrees the TCHC may convene TCHC CoC HMIS User Meetings to discuss procedures, updates, policy and practice guidelines, data analysis and software/hardware upgrades.

The Agency will designate at least one specific staff member, usually the Site Administrator of record, to regularly attend User Meetings.

Notwithstanding any other provision of this Participation Agreement, the Agency agrees to abide by all policies and procedures relevant to the use of the TCHC CoC HMIS that TCHC may publish from time to time.

Publication of Reports

The Agency agrees that it may only release aggregated information generated by the TCHC CoC HMIS specific to its own Agency's services.

The Agency acknowledges that the release of CoC-wide aggregated information will be governed through policies established by TCHC and the CoC HMIS Committee for analysis of information at the CoC-level or community-level. Such information will include qualifiers such as coverage levels or other issues necessary to fully explain the published findings.

Database Integrity

The Agency will not share assigned User ID's and Passwords to access the TCHC CoC HMIS with any other organization, governmental entity, business, or individual.

The Agency will not intentionally cause corruption of the TCHC CoC HMIS in any manner. Any unauthorized access or unauthorized modification to computer system information, or interference with normal system operations, will result in immediate suspension of services, and, where appropriate, legal action against the offending entities.

Hold Harmless

The TCHC CoC HMIS System and TCHC makes no warranties, expressed or implied. The Agency, at all times, will indemnify and hold the TCHC CoC HMIS System or TCHC harmless from any damages, liabilities, claims, and expenses that may be claimed against the TCHC CoC HMIS System and TCHC; or for injuries or damages to the Agency or another party arising from participation in the TCHC CoC HMIS; or arising from any acts, omissions, neglect, or fault of the Agency or its agents, employees, licensees, or clients; or arising from the Agency's failure to comply with laws, statutes, ordinances, or regulations applicable to it or the conduct of its business. This Agency will also hold TCHC CoC HMIS System or TCHC harmless for loss or damage resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption caused by Social Solutions, Inc. or other third party system, by the Agency's or other member agency's negligence or errors or omissions, as well as natural disasters, technological difficulties, and/or acts of God. TCHC CoC HMIS System or TCHC shall not be liable to the Agency for damages, losses, or injuries to the Agency or another party other than if such is the result of gross negligence or willful misconduct of TCHC CoC HMIS System or TCHC. TCHC CoC HMIS System or TCHC agree to hold the Agency harmless from any damages, liabilities, claims, or expenses caused solely by the negligence or misconduct of TCHC CoC HMIS System or TCHC.

Provisions of Section VII shall survive any termination of the Participation Agreement.

Terms and Conditions

The parties hereto agree that this agreement is the complete and exclusive statement of the agreement between parties and supersedes all prior proposals and understandings, oral and written, relating to the subject matter of this agreement.

The Agency shall not transfer or assign any rights or obligations under the Participation Agreement without the written consent of TCHC.

This agreement shall remain in force until revoked in writing by either party, with 30 days advance written notice. The exception to this term is if allegations or actual incidences arise regarding possible or actual breaches of this agreement. Should such situations arise, TCHC may immediately suspend access to the TCHC CoC HMIS until the allegations are resolved to protect the integrity of the system.

This agreement may be modified or amended by written agreement executed by both parties with 30 days advance written notice.

IN WITNESS WHEREOF, the parties have entered into this Agreement:

AGENCY REPRESENTATIVE

By: _____

Title: _____

Signature: _____

Date: _____

TCHC CoC HMIS REPRESENTATIVE

By: Lauren King

Title: Executive Director

Signature: _____

Date: _____

HMIS Data Elements

Universal Data Elements

1. Name (3.01)
2. Social Security Number (3.02)
3. Date of Birth (3.03)
4. Race (3.04)
5. Ethnicity (3.05)
6. Gender (3.06)
7. Veteran Status (3.07)
8. Disabling Condition (3.08)
12. Project Entry Date (3.10)
13. Project Exit Date (3.11)
14. Destination (3.12)
15. Relationship to Head of Household (3.15)
16. Client Location (3.16)
17. Housing Move-In Date (3.20)
18. Prior Living Situation (3.917)

Program-Specific Data Elements

1. Income and Sources (4.02)
2. Non-Cash Benefits (4.03)
3. Health Insurance (4.04)
4. Physical Disability (4.05)
5. Development Disability (4.06)
6. Chronic Health Condition (4.07)
7. HIV/AIDS (4.08)
8. Mental Health Problem (4.09)
9. Substance Abuse (4.10)
10. Domestic Violence (4.11)
11. Current Living Situation (4.12)
12. Date of Engagement (4.13)
13. Bed-Night Date (4.14)
14. Coordinated Entry Assessment (4.19)
15. Coordinated Entry Event (4.20)

Appendix B



TCHC CoC HMIS End User Security and Privacy Agreement

TCHC HMIS System(s) - Including: ETO, Green River -Warehouse and CAS, Outreach Grid, Padmission, etc.

I, _____ (print name), employee at _____ (agency name) acknowledge that, as a representative of a Contributing HMIS Organization (CHO), I have access to confidential and sensitive client information. I understand that certain information contained in Homeless Management Information System (HMIS) files/screens is of a personal nature and that some information is considered confidential under law. I will use this information with confidentiality and discretion. I will disclose this information to other individuals only to the extent that it is specifically authorized. If at any time a question or problem arises about the release of information, I will not release any information until I am so authorized by my supervisor. **Under no circumstances will I access confidential information for any purpose other than the performance of my assigned job duties.**

My TCHC issued Username and Password gives me access to the HMIS system(s). The system(s) contain the private personal identifying information on persons and families being served in the Continuum of Care. As an End User, by my initial on each item below, I indicate my understanding and acceptance of the proper use of my Username and Password and access to this information. Failure to uphold the confidentiality and security standards set forth below is grounds for my immediate termination from the HMIS system(s) and, as applicable, other agency actions and penalties under law. (Initial Each Line Below)

☐ My Username and Password are for my use only and must not be shared with anyone and I will take all reasonable means to keep my password physically secure.

☐ I understand that the only individuals who can view information in the HMIS system(s) are authorized users and the Clients to whom the information pertains.

☐ I may only view, obtain, disclose, or use the HMIS information that is necessary to perform my job.

☐ If I am logged into HMIS System(s) and must leave the work area where the computer is located, I must log-off before leaving the work area. Any computer that has HMIS System(s) open and running shall never be left unattended. I understand that failure to log off appropriately may result in a breach in client confidentiality and system security.

☐ Printed copies of HMIS System(s) generated client information must be kept in a secure file. When printed copies of HMIS information are no longer needed, they must be properly destroyed/shredded.

☐ If I notice or suspect a security breach, I must immediately notify agency supervision, the TCHC Executive Director, or HMIS Administrator(s).

I understand and agree to comply with all the statements listed above.

User Signature

Date

I have instructed this person in the proper security and privacy procedures for use of the Fort Worth/Arlington/Parker & Tarrant County Continuum of Care HMIS system(s). I have explained the importance of information security and the consequences of any violation and believe he/she fully understands the consequences of a violation. I have instructed him/her on basic office practices to assure no breach of use of the internet based HMIS system(s).

HMIS System Administrator

Date

HMIS System Administrator

Date

SCAN AND EMAIL TO TCHC AT: bambi@ahomewithhope.org or anthony@ahomewithhope.org

If you have questions, please call 817-509-3635 or 214-412-0812

Appendix C

FY2021 HMIS Fee Schedule

Site and Program Tier System by Number of Programs

Under this option, agencies would be charged a flat fee, per program, until reaching 9+ programs, at which point would reach a cap. Under this option, there would be a pro-rated, per-program, add-on fee for new programs starting during the course of a year, as well as a one-time fee of \$1,000 per program. New programs will not be added to HMIS until add-on fees collected. Annual fees (as below) would then be due October 31.

| Level | Number of Programs | Fee |
|---------|---------------------------|-------------|
| Tier I | per Program (1 through 8) | \$1,200.00 |
| Tier II | 9+ Programs | \$10,800.00 |

Examples:

1 program add-on to already existing Site in July.

Pro-rate would be \$400 for the remainder of the year (3 months).

Plus a one-time fee of \$1,000.

This would be an upfront cost totaling \$1,400 for this program prior to entry into HMIS.

Annual billing would fall under Tier I or II for the entire organization.

2 programs added at beginning of annual billing

\$0 pro-rate would apply if the program's start date aligns with the annual billing.

\$2,000 for one-time fees would be applied.

Upfront cost totaling \$2,000 for this program prior to entry into HMIS.

The programs would then fall under the annual billing for the entire organization (either Tier I or II).

Appendix D

TX – 601 Continuum of Care Data Quality Management Plan for Homeless Information Management System (HMIS)

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Appendix C, HMIS Data Quality Monitoring, Agency Self Review Tool

Appendix D, HMIS Site Visit Checklist

Section 1: Introduction

A Homeless Management Information System (HMIS) is an information system designated by a local Continuum of Care (CoC) to comply with the requirements of [CoC Program Interim Rule 24 CFR 578](#). It is a locally administered data system used to record and analyze client, service, and housing level data for individuals and families who become or are at risk of homelessness. HMIS is used to aggregate unduplicated data across projects in a community, which is used to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national.

In 2001, Congress instructed the U.S. Department of Housing and Urban Development (HUD) to take measures to improve available data concerning homelessness in the United States. In response, HUD mandated all Continuum of Care regions to implement region-wide databases that would provide an unduplicated count of clients served. Out of this directive came the Homeless Management Information System (HMIS), a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance service agencies and stores that data in a centralized database for analysis.

The HMIS Data Standards (established by publication in the [HMIS Data and Technical Standards Final Notice](#), [HMIS Data Standards- Data Dictionary](#), and [HMIS Data Standards Manual](#)) provide communities with baseline data collection requirements developed by federal partners. The HMIS data standards and program specific data manuals are updated and published routinely to provide funder specific guidelines.

HMIS is now used by federal partners and their respective programs in the effort to end Homelessness, including:

- U.S. Department of Health and Human Services (HHS)
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Veterans Affairs (VA)

In the TX-601 Continuum of Care Governance Charter, the CoC established an HMIS Committee, an official committee of the CoC Board of Directors, and designated Tarrant County Homeless Coalition as the HMIS Lead. The HMIS Committee is responsible for all administrative and oversight functions of the HMIS. The committee creates all policy and procedures for the CoC Board to approve and maintains a working relationship with the designated HMIS Lead Agency. The committee is responsible for the selection and ongoing review of the HMIS software and related tools.

Tarrant County Homeless Coalition is responsible for the day to day management of the HMIS system, including system maintenance, system configuration, compliance, technical assistance, and end user training. Contributing organizations are responsible for ensuring all users are

trained on HMIS systems and receive ongoing support as needed, ensuring all data is input into the system per the CoC established guidelines.

The CoC selected Efforts to Outcomes “ETO,” as its formal HMIS platform. ETO HMIS is an online database used by organizations within TX-601 who provide services to persons experiencing homelessness or are at-risk of homelessness. It records demographic and service usage data and produces an unduplicated count of the people using those services. As an enhancement to the traditional HMIS system, the CoC authorized and implemented the Green River software. Green River serves as a third-party data warehouse platform that can integrate data across HMIS systems as well as across service sectors. The CoC utilizes Green River to integrate data, automate coordinated entry functions, and easily identify performance trends and data integrity issues.

CoC-wide HMIS access can serve as a strategic advantage for service providers. The HMIS software allows multi-level client data sharing between organizations, as well as client case coordination and electronic referrals. Localized policies work to prevent service duplication and enable collaboration between various homeless service providers, while protecting and limiting access to sensitive data. Additionally, ETO conforms to the standard data collection and reporting functionalities, and includes bed management, performance measurement tools, required and ad-hoc reporting, customization options, etc.

Contact Information

For local assistance contact:

Information Services Manager: Bambi Bonilla at Bambi@ahomewithhope.org

CoC Planning Coordinator: Kathryn Welch at Kathryn@ahomewithhope.org

Director of CoC Operations: Anthony Hogg at Anthony@ahomewithhope.org

For Assistance with ETO/HMIS:

<https://sites.google.com/site/etosoftwarehelpmanual/home/organizations/hmis/hmis-reporting-manual/fixing-errors-from-the-data-validation-report>

To learn more about HMIS and data collection:

<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>.

What is Data Quality?

Data quality refers to the extent to which recorded data in the HMIS accurately reflects real-world information. In broad terms, data quality refers to the state of qualitative or quantitative pieces of information. Specific to homeless Coordinated Entry and HMIS, data needs to be measured against four components: timeliness, completeness, accuracy and consistency (this is discussed in greater detail later). High quality data is critical in developing an accurate picture of

the health of a community's homeless Coordinated Entry system. This information also ensures we know where improvements are needed.

In 2004, HUD published HMIS Data and Technical Standards in the Federal Register. The Standards defined the requirements for data collection, privacy safeguards, and security controls for all local HMIS. HUD continues to update HMIS data standards, which can be found on the HUD Exchange Website, <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>.

What is a Data Plan?

A data quality plan is a community-level manuscript that simplifies the ability of the CoC to obtain and achieve statistically valid and reliable data. A data quality plan is generally developed by the Lead HMIS Agency (TCHC) with input from community stakeholders and is formally adopted by the CoC. In short, a data quality plan sets expectations for both the community and the end users to capture reliable and valid data on persons accessing the homeless assistance system.

The plan:

- Establishes specific data quality benchmarks for timeliness, completeness, accuracy, and consistency;
- Identifies the responsibilities of all parties within the CoC regarding data quality;
- Establishes a timeframe for monitoring data quality on a regular basis.

What is a Data Quality Monitoring Plan?

A data quality monitoring plan is the primary tool for tracking and generating information necessary to identify areas for data quality improvement. A data quality monitoring plan is a set of procedures that outline an action plan to include a regular, on-going process for analyzing and reporting on the reliability and validity of the data entered into HMIS at both the project and aggregate system levels.

Section 2: Important Terms

HMIS Data Elements

Universal Data Elements (UDE): baseline data collection that is required for all programs reporting data into HMIS.

Program Descriptor Data Elements (PDDE): data elements recorded about each project in the CoC, regardless of whether the project participates in HMIS; updated at least annually.

Program Specific Data Elements (PSDE): data provided about the characteristics of clients, the services that are provided, and client outcomes. Must be collected from all clients served by programs that are required to report this information to HUD.

HMIS Data Quality: refers to the reliability and validity of client-level data. HMIS data quality can be measured by the extent to which the client data in the system reflects actual information in the real world.

HMIS Reports

Annual Performance Report (APR): a reporting tool that HUD uses to track program progress and accomplishments of HUD homeless assistance programs on an annual basis.

Longitudinal Systems Analysis (LSA): HUD's annual report to Congress on the nature and extent of homelessness nationwide.

System Performance Measures (SPM): HUD's annual system-wide performance measures report including system wide data quality analysis.

Universal Data Quality: an HMIS software report that returns a list of clients enrolled in a particular program with universal data answers; includes flags for missing answers.

Section 3: Data Quality Plan & Data Quality Standards

Data quality standards: a national framework for ensuring that every Continuum of Care can achieve high quality HMIS data.

Data quality standards:

1. Establish administrative requirements, and
2. Set baseline data quality benchmarks for timeliness, completeness, and accuracy.

Data quality standards are clearly defined in the most recent HUD Data Standards. All HMIS participating programs, regardless of their funding source, are to abide by the expectations detailed in the HUD Data Standards:

<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>.

Universal Data Elements

Universal Data Elements (UDE) are basic forms of information used for producing mandatory and relevant reports such as the Annual Homeless Assessment Report (AHAR), Point In Time Count (PIT), and (CAPER). Examples of this information include demographics on individuals, families and children as well as patterns of service usage. This data assists in estimating the current state of homelessness nationally, in addition to increasing funding for homeless assistance programs through Congress. Data is also used locally to inform local and state level representatives and communities of issues and trends impacting homelessness. As a result, this information helps communities offer better tailored resources and programs to end and alleviate homelessness.

Every HMIS participating program is required to submit the following information.

In alphabetical order, the UDEs are:

- Approximate Date Homelessness Started
- CoC Code for Client Location
- Date of Birth
- Date of Birth Data Quality
- Dependency Fields for Prior Living Situation
- Disabling Condition
- Ethnicity
- Exit Destination
- Full Name (First, Last)
- Gender
- Housing Move-In Date
- Name Data Quality
- Number of Times the Client Has Been on the Streets/in ES/or SH in the Past Three Years
- Primary Race
- Project End/Exit Date
- Project Start/Entry Date
- Relationship to Head of Household
- Release of Information
- Residence Prior to Project Start/Entry
- Social Security Data Quality
- Social Security Number (full or partial)
- Total Number of Months homeless on the street/in ES/or SH in the past three years
- Veteran Status

Partner agencies are expected to maintain current knowledge of and adhere to the data collection requirements identified by the federal partner(s) funding their projects.

Program Specific Data Elements

Partner agencies are expected to maintain current knowledge of and adhere to the data collection requirements identified by the federal partner(s) funding their projects.

Each of the federal partner programs using HMIS has a specific manual describing project set up in HMIS and what data elements are required to be collected. Partner Agencies must review the most current Program- Specific Data Manual for their respective federal partners—as a companion reference to HUD’s HMIS Data Dictionary and the HMIS Data Standards Manual—to ensure that all required Program-Specific Data Elements (PSDEs) designated by their funding stream(s) are being collected. Federal partners post these companion manuals on their program websites, and they can also be accessed on HUD Exchange.

Project Descriptor Data Elements

Project Descriptor Data Elements (PDDEs) contain basic information about projects participating in a CoC’s HMIS and help ensure that HMIS is the central repository of information about homelessness. The PDDE’s are the building blocks of HMIS.

They enable TCHC to:

1. Associate client-level records with the various projects that client will enroll in across CoC projects;
2. Clearly define the type of project the client is associated with the entire time they received housing or services;
3. Identify which federal partner programs are providing funding to the project; and
4. Track bed and unit inventory and other information, by project, which is relevant for the Longitudinal Systems Analysis (LSA), System Performance Measures (SPMs), Housing Inventory Counts (HIC), Point In Time (PIT) counts, and bed utilization reporting.

Project descriptor data are generally entered and managed by the HMIS Lead Agency (TCHC), not a project end user. They are created at initial project setup within HMIS and shall be reviewed at least once annually and updated as needed.

The required Project Descriptor Data Elements include the following:

1. Organization Identifiers;
2. Project Identifiers (including Project Type, Method for Tracking Emergency Shelter, Housing Type, and Target Population);
3. Continuum of Care Information;
4. Federal Partner Funding Sources (Including Grant Identifiers); and

5. Bed and Unit Inventory Information (Including Operating Dates, Household Type, Bed Type, Availability, Unit/Bed Count).

Section 4: Roles and Responsibilities

You are responsible for data quality. **All TCHC HMIS participating partners and TCHC HMIS staff are responsible for working together towards high levels of data quality.** Define your role and know your responsibilities.

Data Quality Roles and Responsibilities

| Title | Role | Responsibilities |
|--|---|---|
| HMIS Participating Agencies | Intake, case management, support staff, volunteers, and administrative level staff at participating partner agencies that have an individual license to access HMIS | <ul style="list-style-type: none"> • Adopt and implement all Privacy documentation, release forms, and other agreements pertinent to the local HMIS • If the Agency utilizes a separate third-party software system as an HMIS, the Agency will share client information in a manner to be determined based on the prevailing software systems in use at the time • Comply with all applicable agreements • Execute and manage HMIS User License Agreements with all staff who have HMIS access • Comply with the HMIS Standards as appropriate • Accurately enter all required data into the HMIS system, including accurate and timely information into housing, where applicable • Agencies required to use a comparable database must ensure all data and reporting are current with the most recent HUD Data Standards and provide data to the HMIS Lead as requested • Non-participating Agencies, otherwise known as non-CoC funded Agencies, are not required to maintain HUD Data Requirements, but are encouraged to maintain data collection requirements and reporting capability up to date with the prevailing standards • Ensure that all staff utilizing ETO receive initial and ongoing HMIS training provided by the HMIS Lead |
| HMIS Lead Agency: Tarrant County Homeless Coalition | Staff members of TCHC | <ul style="list-style-type: none"> • Provide 24 hour access to the CoC HMIS system, ETO, via internet connection at https://secure.etosoftware.com/Login.aspx?ETO=tchc • Provide Privacy documentation, release forms and other agreements that may be adopted or adapted in the local implementation of HMIS • Provide initial web-based and in-person (when permissible) group end-user trainings and annual |

| | | |
|---------------------|--------------------------|---|
| | | <p>updates for Agency Site Administrator Staff regarding use of HMIS software, with the expectation that the Agency will convey information to all Agency end-users</p> <ul style="list-style-type: none"> • Provide basic user support and technical assistance. Access to this basic support will typically be available from 8:30 AM to 4:30 PM Monday through Friday, except federal holidays • Execute HMIS participation agreements • Monitor compliance with applicable HMIS standards on a regular basis • Maintain and update as needed the files for HMIS software to include software agreements, HUD Technical Submissions, HUD executed agreements and Annual Progress Reports • Annually submit HUD required reporting, including the LSA, System Performance Measures, HIC, PIT, any data required for the annual NOFA, and others as required • Develop and maintain HMIS agency files to include original signed participation agreements, original signed user license agreements, and all other original signed agreements pertaining to HMIS • Review national, state, and local laws that govern privacy or confidentiality protections and make determinations regarding relevancy to existing HMIS policy • Review of HMIS program descriptors to ensure that participating agency programs are using HMIS accurately • Conduct unduplicated accounting of homelessness annually • Maintain a working knowledge of all HMIS data and technical requirements through training opportunities, networking, and relevant collaborations • Support non-HMIS programs including the integration of EPIC with Green River • Support domestic violence agencies required to use a comparable database by ensuring database is compliant with most up to date data standards and reporting capabilities and data quality metrics • Monitor the HMIS software vendor contract with Social Solutions |
| CoC HMIS Governance | Entity designated by CoC | <ul style="list-style-type: none"> • Project direction and guidance, including governance policy and procedure |

| | | |
|-------|-------------------------------------|---|
| Board | Governance as the “CoC Lead” (TCHC) | <ul style="list-style-type: none"> • Approval of project forms and documentation • Annually review all policies pertaining to HMIS Operations, including: <ul style="list-style-type: none"> ○ Data Quality Management Plan ○ End User Agreements ○ HMIS Privacy Policy ○ HMIS Security Plan ○ Governing HMIS Policies and Procedures |
|-------|-------------------------------------|---|

Section 5: Data Quality Plan

Training

Standardized training is provided by TCHC HMIS and is vital to attaining quality data entry. Software training is performed using a standardized curriculum, presented in a consistent manner by the HMIS team.

- a) User training will cover how to collect data; how to pass data from front-line staff to data entry staff; how to log questions about the data and how to resolve those questions; and how to give feedback and expectations for participating in user meetings. Some of these issues may be project specific, so they may need to be addressed by custom or specialized training rather than as part of the system-wide software training.
- b) All users must attend a minimum of one training session annually.
- c) Training includes: New User training, HMIS Security & Privacy Training, Report Training, and Refresher Training (groups or one-on-one sessions).
- d) In addition, HMIS staff is available to provide technical assistance to users who need help correcting data entry errors.
- e) Training should be facilitated by HMIS staff and not agency staff in order to ensure consistent and current standards.**
- f) Training can be scheduled by e-mailing bambi@ahomewithhope.org.

Policies and Procedures

All staff who use HMIS must abide by the Policies and Procedures for Data Quality, which are detailed in the most recent TCHC HMIS Policies and Procedures Manual.

Specific HMIS Policies & Procedures for Data Quality

Policy 10.1, Accuracy of Data

Policy 10.1.1, Acceptable Sources of Data

Policy 10.1.2, Consistency of Data

Policy 10.1.3, Avoiding Discrepancies in Client Data

Policy 10.2, Completeness of Data

Policy 10.2.1, HUD Mandated Data Quality Standards
 Policy 10.2.2, Blank Client Data
 Policy 10.2.3, Data Quality Fields
 HMIS Data Quality & Monitoring Plan: September 2019

Specific HMIS Policies & Procedures for Data Quality

Policy 10.3, Evaluation of Data Quality
 Policy 10.3.1, Removal of Duplicate Client Records
 Policy 10.3.2, Capitalization Guidelines for Client Data
 Policy 10.4, Timeliness
 Policy 10.4.1, Entering Real-time Client Data
 Policy 10.4.2, Backdating Client Data
 Policy 10.5, Collaboration on Data Between HMIS Staff and Partner Agencies
 Policy 10.5.1, Responding to Staff Inquiries
 Policy 10.5.2, Correcting Data Errors
 Policy 10.6, Ensuring Accuracy of Reporting
 Policy 10.6.1, Provision of Customized Reports

Data Consistency

Each project should enter data on clients in the same way over time, regardless of whom is recording data in HMIS.

Data consistency will ensure that data is understood, collected, and entered consistently across all projects in HMIS. Consistency directly affects the accuracy of data. If an end user collects all necessary data, but not in a consistent manner, the data may not be accurate. All data should be collected and entered in a common and consistent manner across all projects. To ensure this, all intake and data entry personnel will complete initial training before accessing the HMIS system.

Timeliness of Data

Timeliness answers the question: “Is the client information correct?”

HMIS users should include the most current information on the clients served by participating homeless projects. To ensure the most up to date data, information should be entered as soon as it is collected. **Live data entry is highly recommended and expected.**

Timely data entry also ensures that the data is accessible when needed, either proactively (e.g., monitoring, increasing awareness, funding requirements), or reactively (e.g., responding to requests for information, responding to inaccurate information).

Therefore, users should understand that:

1. Client information is to be entered within 24 hours of entry/intake into a project;
2. Client information is to be updated regularly as information changes and at exit or annual assessments.

Data Completeness

For accurate reporting, data needs to be as complete as possible and should contain all required information on clients served in a particular project during a specified time period.

All data entered into HMIS shall be complete. Partially complete or missing data (Social Security Number, year of birth, missing information on disability or veteran status) can negatively affect the ability to provide comprehensive care to clients. Missing data can prevent or delay the client from receiving needed services that could help them become permanently housed, forever ending their episode with homelessness.

The CoC's goal is to collect 100% of all data elements. Despite this, the CoC recognizes that this is not possible in all cases. Therefore, the CoC has established an acceptable range of null/missing and unknown/don't know/refused responses, depending on the data element and the type of project entering data (See Appendix A).

Data Accuracy

Information entered into HMIS needs to be valid. This means it needs to accurately represent information on the people that enter any of the homeless service projects contributing data to HMIS.

Inaccurate data may be intentional or unintentional, and false or inaccurate information is worse than incomplete information and therefore should be avoided. Thus, it should be emphasized to clients and staff alike that it is better to enter nothing (be selecting "don't know" or "client refused") than to enter inaccurate information.

To ensure the most up-to-date and accurate data, one should:

1. Correct data errors on a monthly basis;
2. Remember that recording inaccurate data is prohibited, unless in cases when a client refuses to provide correct information, and;
3. Enter information into HMIS as it is stated from the client.

Agency Self-Review

Agencies should self-review their data quality without being prompted by TCHC HMIS staff.

Any HMIS participating partner can be proactive and request data quality reports to review and correct data quality areas. Reports can be requested by e-mailing bambi@ahomewithhope.org. Common HMIS errors and a HMIS Data Quality Monitoring, Agency Self Review tool is offered in [Appendix B of this document](#).

Section 6: Monitoring Plan

Monitoring

HMIS Participating Agencies will be monitored once per calendar year to ensure compliance with all HUD and local requirements, as well as verify current agency end users, project descriptors, and inventory. This annual monitoring may be used to identify needed areas of additional training and as a factor in any local funding competitions. The HMIS Policy Self-Certification Checklist is included below in Appendix G.

Data quality monitoring may be performed outside of the regularly scheduled reviews, if requested by program funders or other interested parties (e.g., the agency itself, HMIS Lead Agency, CoC, HUD, other Federal and local government agencies).

Report Monitoring Frequency

| Report Type | Frequency | Reporting Responsibility |
|--|-----------|------------------------------|
| Universal Data Quality Elements (UDEs) | Quarterly | All HMIS Partners |
| Program Specific Data Elements (PSDEs) | Quarterly | All HMIS Partners |
| Data Timeliness | Quarterly | All HMIS Partners |
| Community Dashboard on Homelessness | Quarterly | All HMIS Partners |
| Bed Utilization Rate | Quarterly | All Housing Programs in HMIS |
| Project Descriptor Data Elements (PDDEs) | Annual | All HMIS Partners |

| | | |
|-------------------------------------|------------|--|
| Longitudinal Systems Analysis (LSA) | Annual | All HMIS Partners |
| System Performance Measures (SPMs) | Monthly | All HMIS Partners |
| RHYMIS Export | Bi-Annual* | Runaway Homeless Youth (RHY) Sub-Grantees Only |

Monitoring Methods

HMIS will monitor agencies annually at minimum, which may include desk monitoring and/or on-site monitoring. **Desk monitoring** means that HMIS staff will review compliance and agency data timeliness, completeness, and accuracy by reviewing agency/program level data input into HMIS. **On-site Monitoring** means that HMIS will schedule an in-person visit at an agency/program to review facility, computer workstations, paper-based files, and/or data input into HMIS to review compliance and agency data timeliness, completeness, and accuracy.

Data Consistency Checks

HMIS staff will check data accuracy and consistency by running project pre-enrollment, co-enrollment, or post-enrollment data analysis to ensure that the data “flows” in a consistent and accurate manner. For example, the following instances will be flagged and reported as errors:

- Mismatch between exit/entry data in subsequent enrollment cases,
- Co-enrollment or overlapping enrollment in the same project type,
- Conflicting assessments, and
- Household composition error

Monitoring Incentives and Enforcement

To ensure that HMIS partner agencies meet the minimum data entry standards set forth herein, a copy of this Data Quality Plan will be posted to the HMIS website. HMIS staff will provide data quality reports to HMIS partner agencies in accordance with the monitoring schedule described in the Monitoring section to facilitate compliance with the minimum data entry standards.

Data quality thresholds and accomplishments will be reviewed at a minimum annually and considered for scoring as part of the HUD CoC Notice of Funding Availability (NOFA) Application Ranking and Review Process.

HMIS partner agencies that do not adhere to the minimum data entry standards set forth herein will be notified of their errors and provided with specific information regarding the nature of the inaccuracies and methods by which to correct them.

- HMIS partner agencies will be given five business days to correct any identified data quality issues as detailed in the HMIS Policies and Procedures.
- Training will be offered to agencies that remain noncompliant with the minimum data entry standards.
- HMIS partner agencies continuing in default may have access to HMIS suspended until such time as agencies demonstrate that compliance with minimum data entry standards can be reached.
- Data quality is considered in Annual HUD Collaborative Application Ranking and will be reported to the CoC Lead for that purpose.

Technical Support

A primary function of the HMIS Lead is to develop and establish an HMIS support structure and helpdesk protocol to respond to technical queries and to assist end users. Additionally, HMIS will manage all communications with HMIS software vendors to report issues and to plan and implement software upgrades. HMIS staff will provide a reasonable level of support to Participating Agencies via email, phone, and/or remote.

1. HMIS Users should first seek technical support from their agency's HMIS Project Lead
2. If more expertise is required to further troubleshoot the issue, agency HMIS expert or HMIS User should submit request to: HMISTeam@ahomewithhope.org. Refrain from sending email correspondence directly to the HMIS Support Team to ensure a timely response
3. Basic user support and technical assistance will be available from 8:30 AM to 4:30 PM Monday through Friday, excluding holidays
4. Provide issue replication details if possible (or help recreate the problem by providing all information, screenshots, reports, etc.) so HMIS staff can recreate problem if required
5. The HMIS staff will try to respond to all email inquiries and issues within one (1) business days, but support load, holidays and other events may affect response time
6. The HMIS staff will submit a ticket to software vendor if progress is stalled or needs a higher level of resolution

At a minimum of once per year, HMIS will facilitate a feedback forum from HMIS front end users. This forum will typically be in the form of an electronic survey.

Section 7: Benchmarks

Data Quality Benchmarks

Quantitative measures used to assess the validity and reliability of the data. The goal of the benchmarks is to attain consistent data. Recommended thresholds and benchmarks are listed in [Appendix A of this document](#).

The benchmarks in the following areas have been determined:

Timeliness

Is the client information, including intake data, program entry dates, services provided, and program exit dates entered into HMIS within a reasonable period of time?

Benchmark

Client information is entered within 24 hours of intake.

Method

Staff can enter live into HMIS when working with the client or within 24 hours of intake. Data that is not entered within 24 should be entered in backdate to the date and time of enrollment/service. It should be noted that backdated information is often considered in ranking and review by funding entities.

Completeness

Are all the clients receiving services being entered into HMIS? Are all the appropriate data elements being collected and entered into HMIS?

Benchmark

All programs using HMIS shall enter data on 100 percent of the clients they serve.

Method

Missing information does not exceed 5 percent for the HUD Universal and Program-Specific Data Elements for all clients served.

Accuracy

Does HMIS data accurately and consistently match information recorded on paper intake forms and in client files? Are HMIS data elements being collected in a consistent manner?

Benchmark

95 percent of data entered into HMIS must reflect what clients are reporting.

Method

HMIS users will record the full, legal name of the client (first, middle, last) into the system. Do not use nicknames or aliases.

Utilization

Does the agency have a current bed list that can readily demonstrate vacancy and availability? One of the primary features of HMIS is its ability to record the number of client stays (i.e., bed nights) at a homeless residential facility. A low utilization rate could reflect low occupancy, but it could also indicate that data is not being entered in HMIS for every client served. A high utilization rate could reflect that the project is over capacity, but it could also indicate that clients have not been properly discharged from the project in HMIS.

Benchmark

85% minimum bed utilization is required for all housing programs; if 85% is not met, programs will be asked to give detailed reasons for vacancies.

Method

A project's bed/unit utilization rate is the number of beds/units occupied as a percentage of the entire bed inventory. When a client is admitted into a residential project (emergency, transitional, or permanent supportive housing), s/he should also be entered into the bed list in addition to program entry/enrollment. The client remains in the bed list until s/he is discharged from the project. When the client has exited the project, s/he is also discharged from the bed list in HMIS.

Section 7: DQMP Appendices

DQMP Appendix A, HMIS Data Element Quality Thresholds

| Universal Data Element | Target % | TH, PSH, HUD SSO, RRH, HP | | ES, Non-HUD SSO | | Outreach | |
|-----------------------------------|----------|----------------------------|-----------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|
| | | Missing/Data Not Collected | Client Doesn't Know/Refused | Missing/Data Not Collected | Client Doesn't Know/Refused | Missing/Data Not Collected | Client Doesn't Know/Refused |
| Name | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| Social Security Number | 100% | 0% | 0% | 0% | 2% | 0% | 2% |
| Date of Birth | 100% | 0% | 0% | 0% | 2% | 0% | 2% |
| Race | 100% | 0% | 0% | 0% | 2% | 0% | 2% |
| Ethnicity | 100% | 0% | 0% | 0% | 2% | 0% | 2% |
| Gender | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| Veteran Status | 100% | 0% | 0% | 0% | 2% | 0% | 2% |
| Disabling Condition | 100% | 0% | 0% | 0% | 2% | 0% | 2% |
| Prior Living Situation | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| Project Entry Date | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| Project Exit Date | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| Destination | 100% | 2% | 2% | 2% | 2% | 2% | 2% |
| Relationship to Head of Household | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| Client Location | 100% | 0% | 0% | 0% | 0% | 0% | 0% |

HMIS Project Descriptor Data Element Quality Thresholds

| Universal Data Element | Target % | Acceptable Null/Missing % |
|---|-----------------|----------------------------------|
| 2.1 Organization Identifiers | 100% | 0% |
| 2.2 Project Identifiers | 100% | 0% |
| 2.3 Continuum of Care Code | 100% | 0% |
| 2.4 Project Type | 100% | 0% |
| 2.5 Method for Tracking Emergency Shelter Utilization | 100% | 0% |
| 2.6 Federal Partner Funding Sources | 100% | 0% |
| 2.7 Bed and Unit Inventory Information | 100% | 0% |
| 2.8 Site Information – Optional | 100% | 0% |
| 2.9 Target Population | 100% | 0% |

HMIS Bed Utilization Rate Thresholds

| Housing Program Type | Target % |
|------------------------------|-----------------|
| Emergency Shelter | 100% |
| Transitional Housing | 100% |
| Permanent Supportive Housing | 100% |

| Universal Data Element | Target % | TH, PSH, HUD SSO, RRH, HP | | ES, Non-HUD SSO | | Outreach | |
|------------------------------|----------|----------------------------|-----------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|
| | | Missing/Data Not Collected | Client Doesn't Know/Refused | Missing/Data Not Collected | Client Doesn't Know/Refused | Missing/Data Not Collected | Client Doesn't Know/Refused |
| 4.1 Housing Status | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.2 Income and Sources | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.3 Non-Cash Benefits | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.4 Health Insurance | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.5 Physical Disability | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.6 Developmental Disability | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.7 Chronic Health Condition | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.8 HIV/AIDS | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.9 Mental Health Problem | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.10 Substance Abuse | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.11 Domestic Violence | 100 % | 2% | 2% | 2% | 2% | 2% | 2% |
| 4.12 Contact | 100 % | | | | | 2% | 2% |

DQMP Appendix B – Common HMIS Errors

Aliases

Participating agencies will make their best effort to record accurate data. Only when a client refuses to provide his/her/their or a dependent's personal information and the project funder does not prohibit it, it is permissible to enter client data under a HMIS program alias. To do so, the agency must follow these steps:

1. DO NOT enter a client as "Anonymous." All anonymous clients are deleted from HMIS.
2. Instead, create the client record, including any family members, using the first initials of their first name and middle name. Their last name would become the program name. For example, John W Smith seeks services at Helpful Housing. He could be entered in HMIS as First Name: JW, Last name: HelpfulHousing.
3. Set the date of birth to the month of their birth, with the first day of the month (not their actual birth date), and the year of their birth. For example, May 19, 1978 would be listed as 5/01/1978. This helps us keep close to the persons age without inputting their identifiable birthdate.
 - a. Answer the "Name Data Quality" as "partial, street name, or code name reported."
4. Skip any other identifiable elements or answer them as "refused."
5. Make a notation of the alias in the client file and include the corresponding HMIS Client ID number.

If a client's record already exists in HMIS, the agency must not create a new alias record. Client records entered under aliases may affect agency's overall data completeness and accuracy rates. The agency is responsible for any duplication of services that results from hiding the actual name under an alias.

Client Duplicates

If an end user notices a client listed in HMIS with duplicate information, please contact HMIS support and request that HMIS staff merge the duplicate client.

To do so:

- Submit a help ticket with the following link: <https://TCHCHMISsupport.hesk.com>

- Indicate the client ETO case numbers that need to be merged, and any additional information available, such as date of birth, name, etc.

Date of Birth (DOB)

- “Date of Birth Data Quality” must be answered.
- DOB should not be earlier than current date.
- DOB should not be earlier than program entry date.
- DOB should not be later than 90 years from present.
- A minor (i.e., person under age 18) should not be input into an adult shelter (i.e., shelter for persons 18 years and older) and vice versa.

Disabling Condition

- Those receiving SSDI for themselves should be marked as having a disability and have their disability type recorded.
- Those indicating substance abuse, mental health, physical disability, developmental disability, chronic health condition, or HIV/AIDS should be marked as having disability.

Dual Enrollment in Residential Projects

- Clients can be enrolled in multiple projects at a time; however, clients should never be enrolled in multiple residential projects at the same time (e.g., ES, TH, PSH, RRH, TH-RRH).

Gender

- Persons who identify specifically as “Male” would not be input into a woman’s shelter or vice versa a person who identifies specifically as “female” input into a men’s shelter. Persons who identify as “Transgender Female” may be input into a women’s shelter and vice versa persons who identify as “Transgender Male” may be input into a men’s shelter.

Household ID

- No single person should be input in family shelter.
- No family should be input in individual shelter.

- There should be one active head of household per household association.
- In addition to the “Households tab” being completed in the HMIS software, the “Relationship to Head of Household” data element must be completed for each individual household member in the Project Start Assessment.

Housing Move-In Date

- “Housing Move-In Date” must be between the Project Start Date and Project Exit Date.
- It may be the same date as Project Start if the client moves into housing on the date they were accepted into the project.
- There can be no more than one “Housing Move-In Date” per enrollment.
- An old “Housing Move-In Date” from an old project will often populate in an assessment; if old project “Housing move-in date” is not removed from the current, active project start date assessment then negative days to housing will appear in data quality reports.

Name

- First and Last Name should not be the same.
- Suffixes should be properly formatted (e.g., Jr. for “Junior,” Sr. for “Senior”).
- No numerals should be in name fields (except Suffix).
- Suffixes should not be input in last name field.
- First name should not be input as “Husband,” “Wife,” “Woman,” “Man,” “Baby,” “Girl,” “Boy” or similar.
- “Name Data Quality” must be answered.

Project Start Date/Project Exit Date

- All clients should have a Project Start Date.
- The Project Start Date should be later than birth date.
- Project Start Date should be prior to the Exit date.

- Project Start and exit dates should not be the same in residential shelter.
- If a project's data quality reports reflect more clients than expected, this is typically a situation where the agency staff have not exited clients.
- If a project's data quality reports reflect less clients than expected, this is typically a situation where the agency staff have not input client data into HMIS.

Residence Prior to Program Entry

- The client's self-report should not be contradicted by other simultaneous/open/active project enrollments in HMIS; in this case, HMIS partners should coordinate to clean up the respective client records to reflect the most accurate data.

Social Security Number (SSN)

- SSN has all nine numbers and no dashes.
- "Social Security Data Quality" must be answered.
- There should be no zeroing out of SSNs.
- All SSN digits should not be the same (e.g., 000000000, 5555555555, 9999999999).
- All SSN digits should not be sequential (e.g., 123456789).
- If an agency prohibits input of a complete social security number, then the last four digits of the SSN should be recorded and "Social Security Data Quality" should be answered as "Approximate or Partial SSN reported."
- An Individual Taxpayer Identification Numbers (ITIN) cannot be entered in lieu of SSN. The SSN should be left blank and "Social Security Data Quality" should be listed as "Client Doesn't Know."

Veteran Status

- A client under the age of 18 is not a veteran.
- Only veterans should be in put into veteran-specific or veteran-only residential programs.
- Those receiving veteran's pension should be marked as veteran

DQMP Appendix C, HMIS Data Quality Monitoring, Agency Self Review Tool

Purpose: Agencies can use this tool to manage and monitor their efforts to ensure high data quality levels. This tool is intended for persons designated to lead data quality for their agency or team (e.g., program managers, team leaders, agency grants management).

Blanks were intentionally included in this form in the “Date & Duration to Prepare Review” and “Benchmark” columns so agencies can modify the form to fit their needs.

Additional resources to help manage data quality can be found on the HUD Exchange, HMIS Guides and Tools: <https://www.hudexchange.info/programs/hmis/hmis-guides/#hmis-data-quality>.

| Action Item | Associated Report(s) Impact | Lead Staff Assigned to Review | Frequency of Review | Date & Duration to Prepare to Review | Follow-up | Benchmark (“_” are intentional so staff will stay current on Policy & Procedure) | Results |
|-------------------------------------|---|-----------------------------------|---|---|---|---|---|
| <i>Example Data Element</i> | <i>This column will list additional reports that are impacted by the data element in the ‘Action Item’ column such as APR, LSA, SPMs, HIC, PIT, specific funding source, and/or internal managerial report.</i> | <i>e.g., Staff Name and Title</i> | <i>e.g., Monthly, Quarterly, Annually, or Bi-Annual</i> | <i>e.g., First business day of month/30 minutes</i> | <i>In this column relevant notes would be added such as which data elements need to be further addressed? Which staff need additional assistance to improve data quality?</i> | <i>e.g.,_% improvement, days to respond (blanks “_” are intentional so staff will stay current on Benchmarks & related Policy and Procedure)</i> | <i>This column can list the basic findings and/or whether the benchmark was met or unmet.</i> |
| Program Project Descriptor Elements | APR, LSA, SPMs, HIC | | Annually | Annually in January or end of grant(s) fiscal year | Notify HMIS Program Manager of any changes to beds/units, new projects, closing projects, and grant identification numbers. | 100% complete and accurate | |
| HUD Universal Data Elements | APR, LSA, SPMs, HIC, PIT, HUD Collaborative Application Ranking, and Community Dashboard | | Monthly | First business day of month/30 minutes | Communicate to all program staff at team meetings, set internal deadline to review progress on data clean-up, and communicate any additional training needs to HMIS lead. | Clean up data within 5 business days as detailed in HMIS policy ; specific benchmarks are detailed in Appendix A of HMIS Data Quality Plan. | |

| Action Item | Associated Report(s) Impact | Lead Staff Assigned to Review | Frequency of Review | Date & Duration to Prepare to Review | Follow-up | Benchmark (" " are intentional so staff will stay current on Policy & Procedure) | Results |
|-----------------------------------|--|-------------------------------|---------------------|--|--|--|---------|
| Program Specific Data Elements | APR, ESG CAPER, PATH, RHY, SSVF, and HUD Collaborative Application Ranking | | Monthly | First business day of month/30 minutes | Communicate to all program staff at team meetings, set internal deadline to review progress on data clean-up, and communicate any additional training needs to HMIS | Clean up data within 5 business days as detailed in HMIS policy _____; specific benchmarks are detailed in Appendix A of HMIS Data Quality Plan. | |
| Data Timeliness | HUD Collaborative Application Ranking | | Monthly | First business day of month/30 minutes | Communicate to all program staff at team meetings, set internal deadline to review progress on data clean-up, and communicate any additional training needs to HMIS. | Goal is within 24 hours as detailed in HMIS policy _____; can work each month to improve by hours or days. | |
| Housing Move In Date | APR, LSA, SPMs, PIT, HUD Collaborative Application Ranking and Community Dashboard | | Monthly | First business day of month/one hour | Review null and negative days to housing to ensure that housing move-in date is correct for all clients that have exited. | days from program enrollment to move in OR _____% improvement by date. | |
| Relationship to Head of Household | APR, LSA, SPMs | | Monthly | | Review null relationship to head of household to ensure that all members associated with the program enrollment/entry are complete and accurate. | Clean up data within 5 business days as detailed in HMIS policy _____; specific benchmarks are detailed in Appendix A of HMIS Data Quality Plan. | |

| Action Item | Associated Report(s) Impact | Lead Staff Assigned to Review | Frequency of Review | Date & Duration to Prepare to Review | Follow-up | Benchmark (" " are intentional so staff will stay current on Policy & Procedure) | Results |
|---------------------|-----------------------------|-------------------------------|----------------------|--|--|--|---------|
| Exit Destination | APR, LSA, SPMs | | Monthly | | Review all exits to make sure that unknown locations are within benchmarks AND that any exit destinations that are later known are updated in the client's HMIS record. If a client disappears and you later learn of their whereabouts, you need to update the client record in HMIS for your program. | Clean up data within 5 business days as detailed in HMIS policy____; specific benchmarks are detailed in Appendix A of HMIS Data Quality Plan. | |
| Overlap | APR, LSA, SPMs | | Quarterly | | Look to see if your program entry/enrollment overlaps with another program of the same type to eliminate duplication and bad data. | Clean up data within 5 business days as detailed in HMIS policy____; specific benchmarks are detailed in Appendix A of HMIS Data Quality Plan. | |
| Income Verification | APR, LSA, SPMs | | Quarterly & Annually | 10 th business day of the month/1.5 hours | Annual review PER CLIENT documented in HMIS; some funders require additional proof of income to be on file with the agency program. Review all active enrolled client income in programs (required for HUD funded programs) to ensure client income is accurate and updated; income should reflect gain, loss, and/or maintenance. | 0% error rate on HUD APR. | |

| Action Item | Associated Report(s) Impact | Lead Staff Assigned to Review | Frequency of Review | Date & Duration to Prepare to Review | Follow-up | Benchmark ("_" are intentional so staff will stay current on Policy & Procedure) | Results |
|--------------------------------|--|-------------------------------|---|---|---|--|---------|
| Open Exits | APR, LSA, SPMs | | As needed and at the end of the fiscal year | | Annual review at end of fiscal year. Review and close any clients that are no longer active in your program; be sure to backdate to accurately reflect the client's enrollment in your program. | 0% inactive enrollments at the end of the fiscal year | |
| User Last Log- In | Internal Managerial Report | | As needed & monthly | 15 minutes | Managerial tool to see if or when staff are keeping up with data entry and accuracy. | Users who do not log- in within 30 days can lose their license; see HMIS Policy | |
| Duplicate Client Merge | APR, LSA, SPMs, ESG CAPER, PATH, RHY, SSVF | HMIS Support | As needed & monthly | First business day of the month/ 30 minutes | Communicate duplicates to HMIS help-desk support. HMIS will notify each associated agency of the client merge. | 0% duplicate clients within program | |
| Expired Release of Information | Internal Managerial Report | | As needed & monthly | | Ask clients to sign updated release of information for those that have expired in your program(s). | 100% Signed Release of Information signed by client (unless in case of RHY where visibility is completely locked). 100% not expired for active enrolled clients. | |

DQMP Appendix D – Site Visit Checklist

HMIS Annual Agency Site Visit Checklist

Agency/Program(s): _____

Agency Staff in Attendance: _____

| | Item | Action | Response |
|----|---|---|--|
| 1 | Agency Agreement | The Agency Agreement is on file with HMIS and Agency and current to date | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 2 | Business Agreement | The Business Associates Agreement is on file with HMIS and Agency and current to date | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 3 | Contracts Receivable | Any contracts receivables are paid up to date and on file with HMIS and Agency and current to date | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 4 | HMIS End User Agreement | All agency end user agreements are on file with HMIS or will be signed at agency site visit | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 5 | HMIS Policy and Procedures Signature Page | Policy and procedure signature pages are on file with KnoxHMIS for all agency users, or will be signed at agency site visit | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 6 | Notice to Clients of Uses and Disclosures | Posted in agency main lobby and program intake areas | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 7 | HMIS Partners Poster | Posted in agency main lobby and program intake areas | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 8 | Client Release of Information | Reviewed a sample of client release of information on file with agency | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 9 | Privacy and Security Compliance | Use HMIS HIPAA Compliance Checklist to ensure computer, client record, and password security | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 10 | Agency Data Quality & Completeness | Review of agency program-level data quality reports to discuss areas of data completeness, error, and/or future training needs | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 11 | Agency Data Accuracy | Review of agency program-level data accuracy where client's digital HMIS record is compared to the record on file with agency (e.g. income sources, disability status, intake form information, etc.) | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |
| 12 | Bed-list Review (ES, TH, PH only) | Review units/beds listed in HMIS and make any notes on changes to the bed/unit #, dates when beds, target populations available. | <input type="checkbox"/> Met <input type="checkbox"/> Unmet |

Follow-Up/Recommendation Notes:

| |
|--|
| |
| |
| |
| |
| |

HMIS Staff & Date Conducted

Appendix E

Homeless Management System (HMIS) Disaster Recovery Plan

The Tarrant/Parker County Continuum of Care Homeless Management Information System (TX 601-HMIS) is a critically important tool used to gather and maintain information about the homeless population in those counties. This document describes the responsibilities of key personnel and three scenarios where HMIS recovery may be required:

- A. On-site power outage at the Lead Agency in Fort Worth
- B. Local disaster in Fort Worth (and surrounding areas), Texas
- C. Outage or disaster at Social Solutions Global, Inc. (ETO) location

A. On-Site Power Outage or Service Interruption

If there is a power loss at the Lead Agency, users will be able to continue normal day-to-day operations. However, reporting (including custom reporting), and technical support may be temporarily unavailable.

- 1. The TX 601-HMIS data is backed up nightly to an off-site, secure server bank. In the event of a disaster, this data can be immediately available via Internet connection.
- 2. TCHC support will still be available during normal business hours.

B. Local Disaster Plan

1. Local Disaster Plan

A local disaster is considered to be a disaster that affects locations in or around Fort Worth, Texas. In the event of a local disaster:

- a. TX 601-HMIS, in collaboration with the local Agencies, will provide information to local responders (fire, police, etc.) as required by law and within best practice guidelines.
- b. TX 601-HMIS in collaboration with the local Agencies will also provide access to organizations charged with crisis response within the privacy guidelines of the HMIS system and as allowed by law.

2. Staff Emergency Responsibilities

During a disaster, communication between the HMIS Lead Agency staff, the CoC, the Agencies, and the software Vendor (Social Solutions Global, Inc.) will be a shared responsibility that is based on location and type of disaster. Appendix A- Emergency Contacts lists key contact people and their phone numbers.

In the event of an outage or system failure, staff responsibilities include:

- a. The TX 601-HMIS Project Manager or designee will notify all participating CoCs and local Agency Administrators should a disaster or major outage occur at Social Solutions Global, Inc. or in the TX 601HMIS Administrative Offices.

- b. When possible, the TX 601-HMIS Project Manager or designee will also provide a description of the recovery plan timeline.
- c. After business hours, TX 601-HMIS staff will report system failures to the software Vendor using the after regular business hours hotline.
- d. TX 601-HMIS staff will send an email to local Agency Administrators and HMIS staff no later than one hour following identification of the failure.
- e. TX 601-HMIS Project Manager or designated staff will notify the HMIS Vendor if additional database services are required.
- f. If an outage or failure happens at Social Solutions Global, Inc., the Social Solutions support staff will manage communication to the System Administrator as progress is made to address the service outage.

To ensure that HMIS data can be restored in the event of a disaster, HMIS Lead Agencies are required to:

- a. Back-up internal management data systems nightly.
- b. Provide a solution for off-site storage for internal data systems.
- c. Perform automated backups Monday through Friday to a local network access storage (NAS) device.
- d. Emergency contact information, including the names and phone numbers of local responders and key internal organization staff, designated representative of the CoCs, local HMIS Lead Agency, and the TX 601-HMIS Project Manager. See Appendix A- Emergency Contacts for a list of contacts.
- e. The HMIS team is responsible for notification and nature of the emergency and the timeline of TX 601HMIS being available.

C. Outage or Disaster at Social Solutions Global, Inc. (ETO) Locations

1. Software Recovery Services

HMIS data is entered into Social Solutions Global, Inc. database. In the event that there is a service outage or disaster at Social Solutions' location, it is important that Social Solutions (ETO) and all data is backed up and recovered as soon as possible so that personnel in Tarrant/Parker County can do their work.

In addition, TX 601-HMIS has a contract with Social Solutions Global, Inc. that covers the following recovery and preventative options:

a. Standard System Failure

The TX 601-HMIS database is stored online and is readily accessible approximately 24x7.

b. Data Backups

All servers, network devices, and related hardware are maintained by Social Solutions Global, Inc. All client data is backed up online and stored on a central file server repository for 24 hours. Each night Social Solutions Global, Inc. makes a backup of client data and maintains it at a secure location with encryption.

c. Data Restores

Historical data can be restored by contacting Social Solutions Global, Inc. and having them restore the database within a 24-hour period.

d.System Crash Restore

After a system crash, there may be the loss of all unsaved data on the current record. The HMIS system is maintained by Social Solutions Global, Inc. offsite and on a secure server.

2. Major Outages

All major outages are immediately brought to the attention of executive management. Social Solutions Global, Inc. support staff helps manage communication as progress is made to address the service outage. Social Solutions Global, Inc. takes major outages seriously, and understands and appreciates that HMIS is a tool used for daily activity and client service workflow, so every effort will be made to restore service quickly.

Appendix F

Authorization to Disclose Client Information

Client Consent of Data Collection

Last Name

FirstName

I, (Client's Name Above), understand and acknowledge that Continuum of Care is affiliated with the TCHC CoC HMIS System "ETO", and I consent to and authorize the collection of information and preparation of records pertaining to the services provided to me by the Agency. The information gathered and prepared by the Agency will be included in a Homeless Management Information System ("HMIS") database and shall be used by the Agency, TCHC and the U.S. Department of Housing and Urban Development (HUD) to:

- * Help us prioritize, plan, and provide meaningful services to you and your family;
- * Assist our agency to improve its work with families and individuals that are homeless;
- * Allow local agencies to work better together to prevent and end homelessness;
- * Provide statistics for local, state, and national policy makers to set effective goals.

I understand that the following HUD-mandated Universal Data Elements will be collected for the purposes of unduplicated estimates of the number of homeless people accessing services from homeless providers, basic demographic characteristics of people who are homeless, and their patterns of service use.

1. Name
2. Social Security Number
3. Date of Birth
4. Ethnicity and Race
5. Gender
6. Veteran Status
7. Disabling Condition
8. Residence Prior to Program Entry

9. Zip Code of Last Permanent Address
10. Program Entry Date
11. Program Exit Date
12. Unique Person Identification Number*
13. Program Identification Number*
14. Household Identification Number**ETO System Generated Numbers

I also understand that the following Program-Specific Data Elements will be collected for programs that are required to report to HUD, the City of Fort Worth, City of Arlington and Tarrant County, the State of Texas and the United Way. Programs and agencies without this reporting requirement may also collect these elements to facilitate a better understanding of the homeless population in Tarrant and Parker counties.

1. Income and Sources
2. Non-Cash Benefits
3. Physical Disability
4. Developmental Disability
5. HIV/AIDS
6. Mental Health
7. Substance Abuse
8. Domestic Violence
9. Services Received
10. Destination
11. Reasons for Leaving
12. Employment
13. Education
14. General Health Status
15. Pregnancy Status
16. Veteran's Information
17. Children's Education

I understand that I have the right to inspect, copy, and request all records maintained by the Agency relating to the provision of services to me and to receive a paper copy of this form. I understand that my records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed to any other entity except the Agency, TCHC and HUD without my written consent unless otherwise provided for in the regulations. Additionally, I understand that participation in data collection is optional, and I can access shelter and housing services if I choose not to participate in data collection.

Client Release of Information Consent Form

Last Name

FirstName

Client Name: (See Name Above) This Agency, permitted by you, the client, has the ability information contained in the TCHC CoC HMIS with other participating agencies. This sharing of information may enable agencies to better serve you. If you, the client, authorizes this sharing of information please complete the following.

I, (Client's name above) hereby authorize Continuum of Care (Agency name) to release the following personal information contained in the TCHC CoC HMIS System "ETO" to the agencies listed on the attachment

I release the above-named Agency of any legal liability that may arise from the release of this information. I understand that the Agency cannot release information obtained from other sources. I understand that the agency (ies) receiving this information cannot re-release this information to any other agency (ies) without my expressed written consent. I also understand that this authorization for release of information will expire two years from enrollment date, unless otherwise indicated.

I also understand that this release can be revoked, by me at any time and that the revocation must be signed and dated by me, and that revoking of the release will not affect information released prior to the revoking of the release.

Client Consent to Collection Critical Documents

Last Name

FirstName

I,(Client's name above), understand and acknowledge that The Agency is affiliated with the Continuum of Care TX 601 (CoC) HMIS System "ETO", and I consent to and authorize the request to collect of copies of critical documents and vital records by the Agency. The documents gathered will be included in the Homeless Management Information System ("HMIS") database and shall be used by CoC Agencies to:

- * Provide an electronic storage location for copies of critical documents and vital records and allow the client to access copies of critical documents that may be lost, stolen, or needed for proof of identity or reapplication for critical documents and vital records, and
- * Assist in the application and/or to determine eligibility for programs and services.

Records that I consent to be copied, scanned, and attached to my HMIS Client Record include:

*State Identification/Driver's License

*Birth Certificate

*Social Security Card

*Birth Certificate

*Medicaid/Medicare or other Health Insurance Card

*Voter Registration Card

*Veteran Status/Military ID/DD214

*Discharge Documents (ex: Prison, Hospital, Foster Care, etc.)

*Proof of Income

*Award Letters (SSI/SSDI, VA Disability, etc.)

*Hard Copy of HUD Assessments

I understand that I have the right to inspect, copy, and request all records maintained by the Agency within the HMIS system relating to the provision of services to me and to receive a paper copy of this form.

I understand that my records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed to any other entity without my written consent unless otherwise provided for in the regulations. Additionally, I understand that participation in this critical documents and vital records collection is optional.

Today's Date

___/___/___

Two years from Today's Date

___/___/___

Case Number

Staff's Signature

Signature: _____ (Staff Completing Signature)

Client's Name

Signature: _____ (Participants Signature)

VERBAL CONSENT: Due to health concerns (Covid-19, etc.) this client has agreed to verbal consent. (No signature is needed.)

() No

() Yes

Appendix G

HMIS Policy Self-Certification Checklist

Purpose: This document outlines several important privacy and security measures HMIS participating agencies must adhere to.

Instructions: Evaluate each criterion and determine if your agency meets the criteria by selecting “Yes”, “No”, or “Unsure”. Enter any notes you feel are important or relevant to each criterion. Once the document is complete, sign the form at the end. Return the completed form to the HMIS team at Bambi@ahomewithhope.org. All criteria are pulled from HMIS community documents, specifically the Security Plan, Release of Information, and the Privacy notice. To view the full documents please go to the following link: <https://ahomewithhope.org/coc/forms/>.

Once the HMIS Team receives your Compliance Self-Certification Checklist, a member of the HMIS team will reach out to you to resolve any outstanding questions or set up an in-person meeting at your agency if deemed necessary.

| Policy and Privacy Criteria | Notes | Check one |
|---|-------|--|
| Agency has a single HMIS point of contact and a process for the organizational management of accounts. The HMIS Point of contact has signed the “HMIS Point of Contact Agreement” and meets all requirements. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Agency has a process to close inactive accounts within 24 hours from when a user departs the agency. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Is the current HMIS Release of Information (ROI) being used at all intake locations? | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Is the current Privacy Notice available to all clients upon request or posted at all intake locations? | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Agency has a process to request client profiles be locked when/if a client requests their information NOT be shared in HMIS. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |

| Security Criteria | Notes | Check one |
|---|-------|--|
| In accordance with the Security plan, agency understands it must report breaches related to security to the HMIS team. In addition, the agency understands it assumes all liability for a breach within their organization. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |

| | | |
|--|--|--|
| Does the agency have a remote access policy? All remote work must be done over a secure, password protected network. Select "N/A" if the agency policy does not permit remote access. (What about cellular?) | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unsure |
| Agency retains the Code of Ethics (COE) for all active users. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| All HMIS workstations have a password protected screen saver in place. In addition, users are trained to lock their computers should the workstation be left unattended for any period of time. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Agency has secured computers, software, and hardware with limited access to authorized staff only. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Computers using the HMIS are protected by commercially available malware, virus protection software, and must also maintain a secure firewall. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Malware and virus protection software is set to auto-update. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| If Wi-Fi is used at the agency, Wi-Fi is secured with a password. Select "N/A" if no Wi-Fi is available at the agency. | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unsure |

| Confirm Agency Contact Information | |
|------------------------------------|--|
| Address | |
| Website | |
| Telephone(s) | |

| Confirm HMIS Primary Point of Contact Information | |
|---|--|
| HMIS Point of Contact | |
| Position Title | |
| Email | |
| Telephone(s) | |

I affirm that, to the best of my knowledge, the information in this document has been reviewed and is accurate.

_____ (Print Name)

_____ (Signature)

_____ (Date)