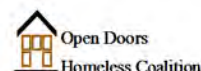


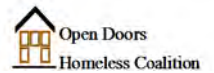
HMIS Policies & Procedures

Open Doors Homeless Coalition
Policies & Procedures
TABLE OF CONTENTS



SECTION A: HMIS DEFINITION OF ROLES AND RESPONSIBILITIES	4
A.001: OPEN DOORS HOMELESS COALITION HMIS DEPARTMENT	4
A.002: HMIS ADMINISTRATOR ROLE	6
A.003: HMIS COMMITTEE ROLE AND RESPONSIBILITIES	8
A.004: OPEN DOORS HOMELESS COALITION BOARD OF DIRECTORS	10
A.005: HMIS COORDINATOR ROLE	12
A.006: PARTICIPATING AGENCY REQUIREMENTS AND RESPONSIBILITIES	13
A.007: PARTICIPATING AGENCY EXECUTIVE DIRECTOR (ED)	15
A.008: PARTICIPATING AGENCY POINT OF CONTACT (POC)	16
A.009: HMIS END USER	18
A.010: TRAINING	19
A.011: AMENDING POLICIES AND PROCEDURES	20
SECTION B: HMIS PARTICIPATION REQUIREMENTS	21
B.001: IMPLEMENTATION REQUIREMENTS AND RECOMMENDATIONS	21
B.002: HMIS SOFTWARE SYSTEM REQUIREMENTS	23
B.003: CLIENT CONSENT PROCEDURE	24
B.004: CLIENT ACCESS TO DATA	26
B.005: CLIENT GRIEVANCE	27
B.006: INTERVIEW PROTOCOL AND DATA COLLECTION	30
B.007: INFORMATION SECURITY PROTOCOLS	31
B.008: MAINTENANCE OF ONSITE COMPUTER EQUIPMENT	33
B.009: ENCRYPTION	34
SECTION C: HMIS ACCESS TO DATA	35
C.001: ACCESS PRIVLEDGES TO SYSTEM SOFTWARE	35
C.002: ACCESS LEVEL FOR SYSTEM USERS	37
C.003: ACCESS TO DATA	38
C.004: ACCESS TO CLIENT PAPER RECORDS	39
C.005: PHYSICAL ACCESS CONTROL	40
C.006: UNAUTHORIZED ACCESS CONTROL	41
C.007: UNIQUE USER ID AND PASSWORD	42
C.008: RIGHT TO DENY USER AND PARTICIPATING AGENCIES ACCESS	44
C.009: DATA ACCESS CONTROL	45
C.010: AUDIT DATA LOGS	48
C.011: DATA ASSESSMENT AND ACCESS	49
C.012: DATA INTEGRITY CONTROLS	51
C.013: LOCAL DATA STORAGE	52

Open Doors Homeless Coalition
HMIS Policy & Procedures
TABLE OF CONTENTS



C.014: TRANSMISSION OF CLIENT LEVEL DATA	53
C.015: DATA RELEASE AUTHORIZATION AND DISTRIBUTION	54
C.016: RIGHT TO DENY ACCESS TO CLIENT IDENTIFIED INFORMATION	57
SECTION D: HMIS TECHNICAL SUPPORT	59
D.001: PLANNED TECHNICAL SUPPORT	59
D.002: PARTICIPATING AGENCY SERVICE REQUESTS	60
D.003: AVAILABILITY AND HOURS OF TECHNICAL SUPPORT	61
SECTION E: HMIS IMPLEMENTATION	62
E.001: STAGE 1: PLANNING	62
E.002: STAGE 2: STARTUP AND INITIAL TRAINING	64
E.003: STAGE 3: OPERATIONAL STATUS	66
SECTION F: DATA QUALITY PLAN	67
F.001: DATA QUALITY ROLES AND RESPONSIBILITIES	67
F.002: TIMELINESS	68
F.003: COMPLETENESS	69
F.004: ACCURACY AND CONSISTENCY	71
F.005: MONITORING	73
APPENDICIES	75
APPENDIX A: AGENCY PARTICIPATION AGREEMENT	75
APPENDIX B: HMIS END USER AGREEMENT	79
APPENDIX C: CLIENT CONSENT FOR HMIS DATA COLLECTION	81
APPENDIX D: CLIENT PRIVACY NOTICE	82
APPENDIX E: HMIS USER CHANGE REQUEST FORM	83
APPENDIX F: HMIS NEW PROGRAM REQUEST FORM	84
APPENDIX G: HMIS USER ISSUE LOG	85
APPENDIX H: HMIS REPORT REQUEST FORM	86
APPENDIX I: HUD UNIVERSAL DATA ELEMENTS	87

Open Doors Homeless Coalition
HMIS Policy & Procedures



Section A: Definition of Roles and Responsibilities		
Open Doors Homeless Coalition HMIS	Section: A	Policy: 001

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

Open Doors Homeless Coalition HMIS will provide quality service and support to the agencies participating in HMIS.

Purpose:

To outline the basic services and support provided by Open Doors Homeless Coalition HMIS.

Open Doors Homeless Coalition is committed to coordinate and provide services to emergency shelter programs and other HUD funded programs that are required to participate in HMIS. Participating Agencies shall sign an Agency Agreement and comply with the stated requirements.

Open Doors Homeless Coalition's HMIS is composed of the Board of Directors, the HMIS Committee, and any HMIS staff employed by the continuum on behalf of its member agencies.

A. Purchase of Software Licensing and Technical Support:

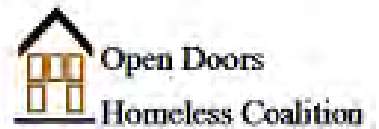
Open Doors Homeless Coalition facilitates the purchase of software and licensing from the identified HMIS Vendor. The Vendor Agreement includes:

- Server based software license (Production and Training Systems)
- User licenses issued
- Training and Software Implementation
- Annual Support Agreement
- Disaster Protection and Recovery Support
- 128-bit encryption

B. Access:

System login access will be approved by the HMIS Committee and facilitated and maintained by the ODHC HMIS Coordinator for all participating agencies.

Open Doors Homeless Coalition
HMIS Policy & Procedures



Section A: Definition of Roles and Responsibilities		
Open Doors Homeless Coalition HMIS (cont'd)	Section: A	Policy: 001

C. Computer Hardware:

New participating agencies that do not have compatible computers will be provided such hardware as deemed necessary by the HMIS Committee upon approval of the ODHC's Board of Directors.

D. Service and Support: HMIS Coordinator

Open Doors Homeless Coalition provide a HMIS Coordinator to offer service and support to participating agencies. The HMIS Coordinator responsibilities are outlined in Section A: Policy 006.

Section A: Definition of Roles and Responsibilities		
HMIS Administrator's Role	Section: A	Policy: 002

Scope:
 Continuum Wide

Policy:
 The HMIS Administrator is responsible for managing data-to-day training and technical support of the HMIS software for all participating Agencies as well as database administration and vendor communications.

Purpose:
 To identify the role and responsibilities of the HMIS Administrator for Open Doors Homeless Coalition.

The role of the HMIS Administrator is to serve participating agencies by providing support, technical assistance, and training while ensuring the integrity of the HMIS database. His/Her duties also include the following:

- Receive full training specific to utilized software
- Communicate system availability, planned outage, and other HMIS information to participating Agency's point-of-contact (POC)
- Facilitate the assignment of user IDs to new users based on the approved licensing structure, authorized agency requests, and documentation of user training.
- Conduct user surveys to determine HMIS effectiveness and functionality.
- Ensure all participation agencies have a privacy policy in place for HMIS implementation that meets or exceeds minimum standards as defined in the Open Doors Homeless Coalition HMIS Policies and Procedures.
- Manage user accounts and application access control, in conjunction with Agency point-of-contact.
- Ensure proper management of data sharing and security settings, based on submission of executed Interagency and Inter-Continuum Data Sharing Agreements.
- Train new users as necessary.
- Communicate application issues and/or system requests to the Vendor and the HMIS Committee.
- Ensure minimum data collection requirements, as required by HUD
- Reporting to the HMIS Committee all needs, issues, concerns, and progress related to Open Doors Homeless Coalition HMIS goals and objectives.
- Promotion and Implementation of HMIS for new agencies

Section A: Definition of Roles and Responsibilities		
HMIS Administrator's Role (cont'd)	Section: A	Policy: 002

- HMIS Orientation of new agencies.
- Monitoring the use of the system to ensure full participation and compliance;
- Auditing access to and use of the HMIS
- Determining the guiding principles for client implementation;
- Working with HMIS Committee, defining data requirements, criteria, standards and parameters for the release of aggregate data
- Developing reports to present data to interested parties;
- Documenting work on the database and in development of reports/queries;
- Identifying system modification requests to meet the needs of participating agencies and coordinating with HMIS Administrator to determine feasibility of recommended changes.
- Data entry assistance as needed by participating agencies and upon approval of the HMIS Committee.
- Ensuring data quality through agency audits as needed/required by the HMIS Committee.

Section A: Definition of Roles and Responsibilities		
HMIS Committee's Role & Responsibilities	Section: A	Policy: 003

Scope:
 Continuum Wide

Policy:
 HMIS Committee will oversee HMIS staff as well as monitor, manage, and maintain accountability for all Continuum HMIS activities.

Purpose:
 To direct all HMIS activities for Open Doors Homeless Coalition Continuum of Care to ensure adherence to Department of Housing and Urban Development grant funding requirements.

The HMIS Committee, convened by the Open Doors Homeless Coalition Executive Board, will advise all project activities.

The HMIS Committee is composed of Open Doors Homeless Coalition Agency representatives and is responsible for the following:

- Management of HMIS Staff employed by the Continuum of Care
- Development and Approval of HMIS Policies and Procedures for use by Open Doors Homeless Coalition participating agencies
- Ensure all participation agencies have a privacy policy in place for HMIS implementation that meets or exceeds minimum standards as defined in the Open Doors Homeless Coalition HMIS Policies and Procedures.
- Adherence to Department of Housing and Urban Development grant funding requirements for data quality, standards and provisions.
- Oversee funding allocations, in coordination with the Board Treasurer, for all allowable HMIS expenses and maintain related paperwork.
- Act as a liaison between participating agencies and the Open Doors Homeless Coalition Board of Directors for service, standards, and financial matters related to HMIS.
- Report status of HMIS implementation and activities at monthly membership meeting and to the Board of Directors as requested.

Section A: Definition of Roles and Responsibilities		
HMIS Committee’s Role & Responsibilities (cont’d)	Section: A	Policy: 003

- Guides the HMIS project
- Serves as the decision making body
- Provides advice and support to the Open Doors Homeless Coalition Continuum of Care.
- Takes actions to ensure adequate privacy protection provisions in project implementation.

Meetings: The HMIS Committee shall meet monthly and as scheduled by the committee as a whole. Special meetings of members may be called by a majority of the Committee.

Minutes of Meetings: Minutes shall be kept of every meeting and shall include, at a minimum, the date, time, and place of the meeting, the names of all who are in attendance, the topics discussed, the decisions reached and actions taken, any reports made, and any other information as may be deemed necessary by the Chair. Open Doors Homelessness Coalition will keep official copies of the minutes for a minimum of five years or as is standard for HUD documentation.

**Open Doors Homeless Coalition
HMIS Policy & Procedures**



Section A: Definition of Roles and Responsibilities		
Open Doors Homeless Coalition Board of Directors	Section: A	Policy: 004

Scope:
Continuum Wide

Policy:
The Executive Board will approve all major HMIS policy decisions and expenditures prior to implementation.

Purpose:
To oversee all HMIS activity at a continuum level for Open Doors Homeless Coalition.

The Board of Directors for Open Doors Homeless Coalition maintains ultimate accountability regarding the management of Homeless Data, associated funding, and adherence to all requirements by the Department of Housing and Urban Development (HUD). Other Board responsibilities are to:

- Review and Approve agreements made on behalf of Open Doors Homeless Coalition for licensing and software support.
- Oversee the HMIS Committee on behalf of all Agency Members.
- Encourage region wide participation.
- Define criteria, standards, and parameters for the usage and release of all data collected as part of HMIS.
- Compile and analyze HMIS data with other provider and community data sources.
- Resolve or make recommendations where conflicts of interest exist.
- Issue sanctions for violations that cannot or should not be handled at the HMIS Committee or participation level.
- Oversee Inter-Continuum Data Sharing

The Chair of the Open Doors Homeless Coalition Board of Directors is responsible for oversight of all contractual agreements with funding entities, as recommended by the CoC and the HMIS committee.

Governance Procedures:

The HMIS Committee provides recommendations to the Continuum of Care related to the governance of HMIS. The HMIS Department is responsible for the day-to-day operation and oversight of the system. Decisions

Open Doors Homeless Coalition
HMIS Policy & Procedures



Section A: Definition of Roles and Responsibilities		
Open Doors Homeless Coalition Executive Board (cont'd)	Section: A	Policy: 004

made or actions by the HMIS Department which do not satisfy an interested party, which may be an agency or client, may be brought before the HMIS Grievance Committee for review.

The Grievance Committee members shall not have a conflict of interest for the grievance they are adjudicating. Membership will consist of the Chair of the HMIS Committee, one CoC representative and three HMIS Committee Members. See Page 27 of this document for the complete grievance policy and procedure.

Section A: Definition of Roles and Responsibilities		
HMIS Coordinator	Section: A	Policy: 005

Scope:
 Continuum Wide

Policy:
 The HMIS Coordinator is responsible for assisting in the data-to-day training and technical support of the HMIS software for all participating Agencies.

Purpose:
 To identify the role and responsibilities of the HMIS Coordinator for Open Doors Homeless Coalition.

The role of the HMIS Coordinator is to serve participating agencies by providing support, technical assistance, and training. His/Her duties also include the following:

- Receive full training specific to utilized software
- Communicate system availability, planned outage, and other HMIS information to participating Agency's point-of-contact (POC)
- Conduct user surveys to determine HMIS effectiveness and functionality.
- Train new users as necessary.
- Communicate application issues and/or system requests to HMIS Administrator and the HMIS Committee.
- Ensure minimum data collection requirements, as required by HUD
- Reporting to the HMIS Committee all needs, issues, concerns, and progress related to Open Doors Homeless Coalition HMIS goals and objectives.
- Act as the liaison for ODHC Agencies with the HMIS Administrator
- Orientation of new agencies into HMIS.
- Developing reports to present data to interested parties;
- Documenting work on the database and in development of reports/queries;
- Data entry assistance as needed by participating agencies and upon approval of the HMIS Committee.
- Ensuring data quality through agency audits as needed/required by the HMIS Committee.

Section A: Definition of Roles and Responsibilities		
Participating Agency Requirements and Responsibilities	Section: A	Policy: 005

Scope:

All Participating Agencies

Policy:

All human service agencies meeting Open Doors Homeless Coalition (ODHC) requirements and signing the Agency Agreement will be granted access to HMIS.

Purpose:

To define requirements for Participating agencies

Participating Agencies shall sign an Agency Agreement and comply with the stated requirements. Agencies will be granted access to the HMIS software system after:

- The Agency Agreement has been signed with Open Doors Homeless Coalition.
- Agencies put in place the stated requirements in the Agency Agreement
- Users attend a User Training session and the Agency Point of Contact attends a Program Management workshop.

Agencies agree to comply with the policies and procedures approved by the HMIS Committee and/or the Open Doors Homeless Coalition Board of Directors.

Each Participating Agency will be responsible for the oversight of all agency staff that generate or have access to client-level data stored in the system software to ensure adherence to the Health Insurance portability and Accountability Act of 1996 (HIPAA), HUD Department of Housing and Urban Development Docket No. FR-4848-N-02: Homeless Management Information Systems (HMIS); Data and Technical Standards final Notice and all State and Federal regulations as well as to ensure adherence to the HMIS principles policies and procedures outlined in this document.

The Participating Agency:

- Hold final responsibility for the adherence of the agency’s personnel to the HIPSSS, HUD Department of Housing and Urban Development Docket No. FR-4848-N-02, Homeless Management Information Systems (HMIS):

Section A: Definition of Roles and Responsibilities		
Participating Agency Requirements and Responsibilities	Section: A	Policy: 005

Data and Technical Standards Final Notice and all State and Federal regulations as well as ensuring adherence to the HMIS principles, policies, and procedures outlined in this document;

- Is responsible for all activity associated with agency staff access and use of the HMIS data system;
- Is responsible for establishing and monitoring agency procedures that meet the criteria for access to the HMIS, as detailed in the policies and procedures outlined in this document
- Will put in place policies and procedures to prevent any misuse of the software system by designated staff;
- Agrees to allow access to HMIS System only to staff who have been trained in the system and who have a legitimate need for access. Need exists only to those shelter staff, volunteers, or designated personnel who work directly with (or who supervise staff who work directly with) clients, or have data entry or technical responsibilities; and
- Agrees to follow accepted change control procedures for all configuration changes as outlined in the HMIS System Administrators Manual.

The Agency also oversees the implementation of data security policies and standards and will:

- Assume responsibility for integrity and protection of client-level data entered into the HMIS system;
- Ensure organizational adherence to the HMIS Policies and Procedures
- Communicate control and protection requirement to agency custodians and users.
- Authorize data access to agency staff and assign responsibility for custody of the data;
- Monitor compliance and periodically review control decisions;
- Ensure that data is collected in a way that respects the dignity of the participants
- Ensure that all data collected must be relevant to the purpose for which it is used, that entry and exit data are entered accurately and on time; and
- Provide prompt and timely communication of data, changes in license assignments and user accounts and software to the HMIS Coordinator.
- Notify immediately the HMIS Coordinator of any issue relating to system security or client confidentiality.

Section A: Definition of Roles and Responsibilities		
Participating Agency Executive Director (ED)	Section: A	Policy: 006

Scope:

Executive Directors of Participating Agencies

Policy:

The Executive Director or CEO of each participating agency will be responsible for oversight of all agency staff that generate or have access to client level data stored in HMIS and will ensure adherence to the standard operating procedures outlined in this document.

Purpose:

To outline the role of the participating agency Executive Director with respect to oversight of agency personnel in the protection of client data within the HMIS software.

The participating agency’s Executive Director is responsible for all activity associated with agency staff access and use of HMIS Software. This person is responsible for monitoring agency procedures that meet the criteria for access to HMIS Software, as detailed in this document. The ED agrees to allow access to HMIS Software only for those staff, volunteers, or designated personnel who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities.

The ED also oversees the implementation of data security policies and standards and will:

- assume responsibility for integrity and protection of client-level data entered into HMIS Software;
- establish business controls and practices to ensure organizational adherence to the policies and procedures;
- communicate control and protection requirements to agency custodians and users;
- authorize data access to agency staff and assign responsibility for custody of data; and
- monitor compliance with Open Doors Homeless Coalition’s policies and procedures and individual agency regulations.

Section A: Definition of Roles and Responsibilities		
Participating Agency Point of Contact	Section: A	Policy: 007

Scope:

System Wide

Policy:

The Agency Point of Contact (POC) is responsible for the security of the system at an Agency level and that all users of their agency comply with HMIS policy and procedures and the security measures outlined below.

Purpose:

To outline roles and responsibilities of the Agency Point of Contact.

The Executive Director for the Participating Agency agrees to identify an Agency Point of Contact (POC) who will be responsible for

- Editing and updating agency information
- Ensuring that access to HMIS is requested for authorized staff members only after they have:
 - Received training;
 - Satisfactorily demonstrated proficiency in the use of software and
 - Demonstrated understanding of the Policies and Procedures and agency policies referred to above.
- Granting technical access to the software system for persons authorized by the Agency's leadership by requesting the HMIS Coordinator to create passwords and grant licenses needed to enter the system;
- Designating each individual's level of access;
- Ensuring that new staff persons are trained on the uses of the HMIS software system, including review of the Policies and Procedures in this document and any agency policies which impact the security and integrity of client information;
- Notifying all users in their agency of interruptions in service
- Serving as a point-person in communicating with HMIS staff
- Facilitating timely reporting from Agency she/he represents (unless the Agency has designated another person for this function); and
- Working cooperatively with HMIS technical staff and consultants.

The Point of Contact must be aware of the sensitive nature of the data and take appropriate measures to prevent unauthorized disclosure by ensuring:

Section A: Definition of Roles and Responsibilities		
Participating Agency Point of Contact (cont'd)	Section: A	Policy: 007

- Users are responsible for protecting institutional information to which they have access and for reporting security violations.
- Users must comply with the data security policy and standards as described below and in Section C: Access to data.
- Users are accountable for their actions and for any actions undertaken with their usernames.

The Agency Point of Contact is also responsible for the implementation of data security policy and standards including:

- Administering agency-specified business and data protection controls
- Administrating and monitoring access control
- Providing assisting in and/or coordinating the recovery of data, when necessary and
- Detecting and responding to violations of the Policies and Procedures or agency procedures.

The HMIS Coordinator will coordinate training and technical assistance for Agency Point of Contact staff.

Section A: Definition of Roles and Responsibilities		
HMIS End User	Section: A	Policy: 008

Scope:
 Continuum Wide

Policy:
 All End Users will comply with system security standards and best practices to ensure the confidentiality of client information.

Purpose:
To identify the responsibility of the End User in HMIS Operations

All individuals at the participating agency levels who require legitimate access to the software system will be granted such access after training, agency authorization, and signing the End User Agreement provided by Open Doors Homeless Coalition (see appendix B). The End User Agreement acknowledges an understanding of the confidential nature of the data within the HMIS and an individual's commitment to adhere to the Privacy Policy distributed to all clients upon intake.

Users are any persons who use the HMIS software for data processing services. They must be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure. Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with the data security policy and standards as stated by the Agency and HUD baseline requirements stated in Final Notice Docket No. FR-48948-N0-02. Users are accountable for their actions and for any actions undertaken with their usernames and passwords. Users must advise the Agency Point of Contact and the HMIS System Administrator if their passwords are compromised.

Contractors, volunteers, interns and other who function as staff, whether paid or not, are bound by the same User responsibilities and rules set forth in this manual.

Section A: Definition of Roles and Responsibilities		
Training	Section: A	Policy: 009

Scope:
 Continuum Wide

Policy:
 Training will be available to users.

Purpose:
 To identify the responsibility of the End User in HMIS Operations

HMIS staff will coordinate ongoing training schedules for Agency Point of Contacts and end users. Training will occur on a regular basis. The schedule of training will be determined by the HMIS Administrator.

Training schedule:

Basic: Introduction to the HMIS System (End User Training)

- Introduction to the HMIS Project
- Review of applicable policies and procedures
- Connecting to the Internet
- Logging onto the HMIS system
- Entering client information including demographic, placements, and services, HUD data and case management.

Program Management: Overview of the HMIS Project (Agency Point of Contact)

- Review of agency technical infrastructure including roles and responsibilities
- Review of security policies and procedures
- Overview of agency administrative functions
- Assigning user access levels
- Entering and updating information pertaining to the participating agency
- Review of HMIS technical infrastructure
- Reporting with HMIS
- Introduction to reports
 - Using existing reports
 - Creating new reports
 - Exporting information to another software application.

Section A: Definition of Roles and Responsibilities		
Amending Policies and Procedures	Section: A	Policy: 010

Scope:
 Continuum Wide

Policy:
 Policies and Procedures may be amended as needed and distributed to Participating Agencies and End Users upon approval.

Purpose:
 To identify the process for recommending policy change and the approval and dissemination process within Open Doors Homeless Continuum of Care.

These Policies and Procedures may be amended. It is expected that information will be added, removed and altered as necessary.

Any changes suggested by any party in the continuum may be presented by a member of the HMIS Committee or Any Continuum of Care Agency staff member. Recommendations will be submitted to the HMIS Committee for approval and are subject to the Open Doors Homeless Coalition Executive Board prior to approval and dissemination.

Upon approval, all HMIS End Users and Participating Agencies will receive updates either via email or U.S. Mail and are expected to maintain a current copy of all procedures onsite for employee and management use.

Section B: Participation Requirements		
Agency Participation: Implementation Requirements & Recommendations	Section: B	Policy: 001

Scope:

Continuum of Care Wide

Policy:

Participating Agencies as mandated by HUD and others serving the needs of homeless persons are eligible and encouraged to participate in HMIS.

Purpose:

To define agencies encouraged and required to utilize HMIS.

Agencies meeting the following criteria are **expected** to participate in HMIS:

- Recipients of HUD McKinney Vento Act program funds (Emergency Shelter Grants, Supportive Housing Program, Shelter Plus Care, and Section 8 SRO programs)
- Programs funded by the Housing Opportunities for Persons with AIDS (HOPWA) that target homeless persons

All other programs that serve homeless persons and are within a local Continuum of Care are **encouraged** by the Department of Housing and Urban Development (HUD) to participate in HMIS, especially those which are federally-funded.

Participating Agency Requirements:

Identification of an Agency Point of Contact: Each Participating Agency is responsible for the designation of one key staff person to serve as the Agency Point of Contact whose responsibilities are as follows:

- Requesting the creation of usernames and passwords
- Monitoring software access, among other activities
- Ensuring training of new staff person on how to use HMIS and
- Communication with HMIS staff about user access and other HMIS activities at the agency level.

Security Assessment: meeting of Agency Executive Director or designees, and Agency Point of Contact with HMIS staff member to assess and complete

Section B: Participation Requirements		
Agency Participation: Implementation Requirements & Recommendations (cont'd)	Section: B	Policy: 001

The Agency Information Security Protocols. Agency IT staff may be asked to participate as necessary.

Training:

The Participating Agency agrees to make a commitment to have the Agency Point of Contact and designated staff persons to attend training(s) prior to accessing the system online.

NOTE: All Security Information paperwork needs to be complete and signed by the Agency Executive Director or designee in order for Participating Agency Staff to attend training.

Client Data: Agencies must:

- Secure written permission for the client to enter the client’s data into HMIS.
- Secure a release of information from the client to share personal information with other agencies
- Provide written explanation to each a client of how information is to be used and stored and on the client’s recourse if s/he feels data is misused e.g., grievance policy. Any incident regarding compromise of client confidentiality must be reported to ODHC staff immediately.

HMIS Signage: Privacy Notice

The HUD Data and Technical Standard require a baseline requirement that every Participating Agency post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting protected personal information (PPI). Individual Providers should post the Privacy notice provided (see Appendix D) to meet this HUD requirement.

Section B: Participation Requirements		
HMIS Software System Requirements	Section: B	Policy: 002

Scope:

System Wide

Policy:

HMIS Software should meet the minimum requirements set forth in the HMIS Final Notice in the Federal Registry and preferably agreed upon by all Partner Agencies involved to provide compatibility and accuracy in data collection, report generation, and data storage.

Purpose:

To provide a software platform serviceable to the HMIS system.

HMIS Software should address the following requirements:

- Automatic Generation of Identification Numbers and Information Personal Identification Numbers (PINs)
- Household Identification Numbers
- Program Identification Information
- Program Event Numbers Missing Value Categories
- Other Response Categories
- Data Export
- Storage Requirements
- Anonymous Data Collection
- Continuum of Care Requirements
- Universal Data Elements

The Executive Board of Directors of Open Doors Homeless Coalition has identified a software vendor that meets all the above noted requirements for HMIS.

Section B: Participation Requirements		
Client Consent Procedure	Section: B	Policy: 003

Scope:

System Wide

Policy:

All Clients have the right to be fully informed of our intention to collect data and the purpose and use of said data. No data should be collected without consent of the Client. Clients must be informed of their right to privacy and the confidentiality of this data.

Purpose:

To obtain consent of Clients for the data collection necessary for HMIS.

- Any information that can be used to identify a particular individual is protected personal information.
- An HMIS user, for these purposes, is defined as program staff (or trained volunteers) and CoC system administrators who use the HMIS or any developer or vendor of the HMIS system.
- An individual has a right to adequate notice of the uses and disclosures of protected personal information that may be made by the HMIS user or developer and of the individual's rights and the HMIS user or developer's legal duties with respect to protected personal information. The notice should be prominently displayed in the program offices where intake occurs with printed copies readily available to the Clients and kept on file by the HMIS Administrator.
- Clients have the right to refuse consent for any data collection and there is no implied consent. Clients must sign a Form of Consent and given a printed copy of that form. A signed copy of the Client's Consent form must be kept on file by the HMIS Administrator. A Privacy notice will also be available to the Client in printed form describing the uses and confidentiality of all data collected by HMIS.

Confidentiality and Informed Consent

Informed consent includes both oral explanation and written client consent for each client.

Oral Explanation:

Section B: Participation Requirements		
Client Consent Procedure	Section: B	Policy: 003

All clients will be provided an oral explanation of HMIS. The Participating Agency will provide an oral explanation of the HMIS and the terms of consent. The agency is responsible for ensuring that this procedure takes place prior to every client interview. The Oral Explanation must contain the following information.

- What HMIS is
Computer based information system that homeless service agencies across the community use to capture information about the persons they serve.
- Why the agency uses it
 - To understand their clients' needs
 - Help the programs plan and have appropriate resources for the people they serve
 - To inform public policy in an attempt to end homelessness.
- Security
 - Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records.
- Privacy Protection:
 - No information other than Client profile, HUD required data, and Additional Profile information will be released to another agency without written consent.
 - Client has the right not to answer any question, unless entry into the program requires it.
 - Client information is transferred in an encrypted format to the HMIS database.
 - Client has the right to know who has added to, deleted, or edited their HMIS client record.

Open Doors Homeless Coalition's HMIS department has developed a client privacy notice and client consent for HMIS data collection for use by Participating Agencies. These documents can be found on the agency website or by viewing appendices C and D.

Section B: Participation Requirements		
Client Access to Data Procedure	Section: B	Policy: 004

Scope:

System Wide

Policy:

Any client will have access on demand to view, or keep a printed copy of, his or her own records contained in the Open Doors Homeless Coalition HMIS. All requests for client information will follow agency policy guidelines for release of information. The client will also have access to a logged audit trail of changes to those records. No client shall have access to another client's records in the Open Doors Homeless Coalition's HMIS.

Purpose:

To provide client access to their own personal protected information (PPI) and to inform them of who has accessed their data

1. A client will provide a signed written request to his or her case manager to see his or her own record.
2. The case manager, or any available staff person within Open Doors Homeless Coalition HMIS access, will verify the client's identity and print all requested information. The case manager can also request a logged audit trail of the client's record from the HMIS Administrator.
3. The HMIS Administrator will contact the System Administrator who will print this audit trail and, with agency approval, forward to the Agency Administrator for distribution to the client.

Section B: Participation Requirements		
Client Grievance Procedure	Section: B	Policy: 005

Scope:

System Wide

Policy:

Clients will contact the Participating Agency with which they have a grievance for resolution of HMIS problems. Participating Agencies will report all HMIS-related client grievances to the HMIS Coordinator or System Administrator.

Purpose:

To allow clients to express concerns and have correction implemented.

The HMIS Committee holds the final authority for all decisions related to the governance of the HMIS System. Decisions made or actions authorized which do not satisfy an interested party, including those at the Continuum, agency or client levels, may be brought before the HMIS Grievance Committee for a decision in accordance with the HMIS Grievance procedure.

The Grievance Committee members shall not have a conflict of interest for the grievance they are to adjudicate. Membership will consist of the Chair of the HMIS Committee, one CoC representative and three HMIS Committee members.

Client Grievance:

Clients of participating agencies use the participating agency's existing grievance procedure regarding unsatisfactory services or use and disclosure of Personal Protected Information (PPI) in HMIS, as these issues are most likely within the participating agency. It is only when the issue involves the actions of the HMIS regional operation that the HMIS Grievance Procedure is to be used. Additionally the HMIS Grievance Procedure is not intended for use as an "appeal" for a local agency decision.

If a client wants to file a complaint:

1. The Client complaint is to be brought to the attention of the Participating Agency's Executive Director or designee, who shall assist the client in the Grievance Procedure.

Section B: Participation Requirements		
Client Grievance Procedure (cont'd)	Section: B	Policy: 005

2. The complaint is to be stated in writing.
3. The complaint shall be returned to the HMIS party who has the ability and authority to take corrective action. If needed the HMIS System Administrator or designee will assist in identifying the appropriate party.
4. The client and the Participating Agency's representative meet together with the appropriate HMIS party to resolve the complaint
5. The actions and resolutions shall be in writing.
6. If the matter cannot be resolved to the satisfaction of all parties, the HMIS Committee will convene the Grievance committee, giving them information concerning all actions taken to date.
7. The Grievance Committee will meet no later than ten (10) working days after being convened to hear the complaint.
8. The Grievance Committee will resolve the complaint within five (5) working days after the meetings.
9. Should the client want to appeal the Grievance Committee's decision, the HMIS Committee will hear the complaint at its next scheduled meeting and resolve the complaint in a manner which it makes its decision. This decision is final.
10. All actions and resolutions will be in writing. Both the client and the HMIS party involved will have a copy describing the resolution of the complaint.

Grievance by Participating Agencies or a Continuum of Care:

Participating Agencies who are participating in the HMIS with the continuum of Care are to first ascertain if the issue is at the Continuum of Care level and if so to resolve it at that level.

If a Participating Agency, Continuum of Care, or any combination of such organizations has a complaint about a decision or action of the HMIS staff concerning HMIS or any issue which HMIS has responsibility, they should first bring the matter to the attention of the HMIS Administrator or designee and/or the party who has the ability and authority to take corrective action as a verbal, informal Grievance Procedure.

Informal Grievance Procedure:

The informal grievance procedure involves bringing the issue verbally to the HMIS party who has the ability and authority to take corrective action. It is intended that discussion between the parties shall resolve the issues.

Formal Grievance Procedure:

Section B: Participation Requirements		
Client Grievance Procedure (cont'd)	Section: B	Policy: 005

If the matter is not resolved through the Informal Grievance Procedure to the satisfaction of the participating Agency or Continuum of Care the Formal Grievance Procedure should be initiated.

1. The complaint should be in writing and submitted to the HMIS Committee who will convene the Grievance Committee
2. The Grievance committee will meet no later than ten (10) working days after being convened and notified of the complaint and will consider information from all parties involved.
3. The Grievance Committee will hear the complaint from all parties.
4. The Grievance Committee will resolve the complaint within five (5) working days.
5. The actions and resolution of the grievance shall be in writing.
6. If the grieving party is not satisfied, the decision may be appealed to the HMIS committee who will hear and resolve the complaint at its next regularly scheduled meeting. This decision is final.

Section B: Participation Requirements		
Interview Protocol and Data Collection	Section: B	Policy: 006

Scope:
 System Wide

Policy:
 Participating Agencies that collect client data for use in the Open Doors Homeless Coalition HMIS must use and appropriate interview protocol.

Purpose:
 To ensure the existence of approved interview protocols to be used by agency staff in the collection of client data.

The interview protocol is a tool used to structure the process of data collection. Participating Agencies will develop interview protocol to comply with minimum data collection requirements for use in aggregate analysis. The Participating Agencies agrees to enter this level of information into HMIS Software on a regular basis. By signing the Participating Agreement, the Participating Agency agree to the data collection commitment and is responsible for updating on a daily or as needed basis all information for all clients who have received services. All McKinney Vento funded homeless assistance providers are required collect the universal data elements. The universal data elements are determined by Department of Housing and Urban Development (HUD) and are available in appendix I.

The universal data elements are needed to understand the extent of homelessness, the characteristics of homeless clients, and the patterns of service used for the entire homeless population.

Section B: Participation Requirements		
Information Security Protocols	Section: B	Policy: 007

Scope:

Participating Agencies

Policy:

Participating Agencies that collect client data for use in the HMIS will follow these policies & procedures for information security protocols

Purpose:

To protect the confidentiality of the data and to ensure its integrity at the site

To protect the confidentiality of the data and to ensure its integrity at the site whether during data entry, storage and review or any other processing function, a Participating Agency must develop at a minimum rules, protocols, or procedures including addressing each of the following:

- Assignment of user accounts
- Unattended workstations
- Physical access to workstations
 - The implementation of hardware and/or software firewall to secure local systems/networks from malicious intrusion.
- Use of Antivirus Software including the automated scanning of files as they are accessed by users on the system where the HMIS application is used as well as assuring all client systems regularly update virus definitions from the software vendor.
- Computer Operating Systems are regularly updated for security and critical updates provided by the software vendor.
- Use of Anti-Spyware, including the automated scanning of files as they are accessed by users on the system where the HMIS application is used as well as assuring that all client systems regularly update virus and spy ware definitions from the software vendor.
- Password complexity, expiration, and confidentiality
- Policy on users including not sharing accounts
- Client record disclosure
- Report generation, disclosure and storage.

Oversight of the development and use of these standards will the responsibility of the Executive Director of the Participating Agency.

Section B: Participation Requirements		
Information Security Protocols (cont'd)	Section: B	Policy: 007

Open Doors Homeless Coalition Continuum of Care will manage the contractual relationship with a third party software development corporation which will in turn continue to develop, implement and maintain all components of operations of the web-based system including a data security program. The HMIS Committee will:

- Define the data security program
- Implement its standards
- Promote awareness of the program to all interested parties.

Access to areas containing HMIS equipment, data, and software will be secured. All client-identifying information will be strictly safeguarded in accordance with appropriate technical safeguards. All data will be securely protected to the maximum extent possible.

The scope of security includes:

- Technical safeguards
- Physical safeguards, including but not limited to, locked doors
- Network protocols and encryption standards such as https/ssl encryption (an indicator of encryption use); and
- Client data security (Data Encryption)
- Server and client-side certificates

Section B: Participation Requirements		
Maintenance of Onsite Computer Equipment	Section: B	Policy: 008

Scope:

Participating Agencies

Policy:

Participating Agencies commit to a reasonable program of data and equipment maintenance in order to sustain an efficient level of system operation

Purpose:

To ensure that Participating Agencies adopt an equipment and data maintenance program

The Executive Director of the Participating Agency will be responsible for the maintenance and disposal of onsite computer equipment and data used for participation in the Mississippi United to End Homeless HMIS, including the following:

- A. Computer Equipment:** the Participating Agency is responsible for maintenance of onsite computer equipment. This includes upgrades to all new and existing computer equipment.
- B. Backup:** The Participating Agency is responsible for supporting a backup procedure for any Mississippi United to End Homeless related data stored on an Agency's computer. A backup procedure may include archival of old data and other general backups of user documents and files.
- C. Internet Connection:** Neither the System Administrator nor the Open Doors Homeless Coalition HMIS Coordinator are responsible for troubleshooting problems with Internet connections and/or non-HMIS software.
- D. Data Disposal:** The Participating Agency agrees to dispose of documents that contain identifiable client level data by shredding paper records, deleting any information from diskette or CD before disposal, and deleting any copies of client level data from the hard drive of any machine before transfer or disposal of property.

Section B: Participation Requirements		
Encryption	Section: B	Policy: 009

Scope:
 Participating Agencies

Policy:
 Open Doors Homeless Coalition Participating Agencies that collect client data for use in the HMIS system must use system software capable of 128-bit encryption for sending data to servers over an internet connection

Purpose:
 To prevent possible access to confidential HMIS data by third parties via an intercepted internet connection

- Partner agencies must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks or phone lines to current industry standards. The current standard is 128-bit encryption. Unencrypted data may be transmitted over secure direct connections between two systems.
- A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network would have secure direct connections.

Section C: Access to Data		
Access Privileges to System Software	Section: C	Policy: 001

Scope:

Participating Agencies

Policy:

Participating Agencies will apply the user access privilege conventions set forth in this procedure.

Purpose:

To ensure information security protocol

User Access to HMIS Software

- A. User Access:** User access and user access levels will be deemed by the Executive Director of the Participating Agency in consultation the HMIS Coordinator. The HMIS Coordinator (or System Administrator) will generate usernames and passwords within the Administrative function of HMIS Software.
- B. User name format:** The HMIS Coordinator (or System Administrator) will create all usernames using the First Initial of First Name and Last Name. Example Jane Doe’s username would be JDoe. In the case where there are two people with the same first initial and last name, a sequential number should be placed at the end of the above format. Example JDoe2, JDoe3.
- C. Passwords:**
 1. *Creation:* Passwords are created by the HMIS Coordinator (or System Administrator) using HMIS best practices when a user is created. HMIS Coordinator will communicate the initial password to the user via email.
 2. *Use of:* The user will be required to change the password the first time they log onto the system. The password must be between 8 and 16 characters and contain 1 numbers, 1 capitalized letter and 1 special character. .
 3. *Expiration:* Passwords expire every 45 days.
 4. *Termination or Extended Leave from Employment:* The Agency Point of Contact will notify the HMIS Coordinator to terminate the rights of a user immediately upon termination from their current position. If a staff person is to go on leave for a period of longer than 45 days, their password should be inactivated within 5 business days

Section C: Access to Data		
Access Privileges to System Software	Section: C	Policy: 001

of the start of their leave. The HMIS Coordinator (or System Administrator) is responsible for removing users from the system. The HMIS Coordinator will print the access list once a quarter.

Section C: Access to Data		
Access Level for System Users	Section: C	Policy: 002

Scope:

Continuum Wide

Policy:

The Participating Agency will apply the proper designation of user accounts and manage the use of these accounts by agency staff

Purpose:

To ensure information security protocol.

Designation of HMIS Software users is the responsibility of the participating agency. Users are identified upon program startup and can be modified by submitting a User Change form to the HMIS Coordinator.

User accounts will be created and deleted by the HMIS System Administrator.

Designation of HMIS User Levels:

There are different levels of access to HMIS. These levels are reflective of the access a user has to client level paper records. Access levels should be need-based.

A participating Agency must require each member of its staff (including employees, volunteers, affiliates, contractors, and associates) to sign (upon hire, and when modified) an end user agreement – as provided in the Attachment section – to acknowledge receipt of a copy of the privacy notice and to pledge to comply with the privacy notice as issues.

Section C: Access to Data		
Access to Data	Section: C	Policy: 003

Scope:

Participating Agencies

Policy:

Participating Agencies must agree to ensure the user access privileges to system data server as stated below.

Purpose:

To ensure information security protocol.

- A. **User Access:** Unless restricted by the entering participating agency, user will be able to view the data entered by other agencies. Security measures exist within HMIS Software that restricts agencies from viewing each other's data.
- B. **Raw Data:** Users who have been granted access to the HMIS Software Report_Writer tool have the ability to download and save client level data onto their local computer. Once this information has been downloaded from HMIS Software in raw format to an agency's computer, these data then become the responsibility of the agency. A participating Agency should develop protocol regarding the handling of data downloaded from the Report_Writer.
- C. **Agency Policies Restricting Access to Data:** The Participating Agency must establish internal access to data protocols. These policies should contain the following elements:
 - a. Physical security policies and procedures
 - b. User security training
 - i. User Orientation
 - ii. Periodic reminders of internal procedures
 - iii. An industry recognized user authentication system
 - c. Access authorization policies and procedures
 - d. Access revocation policies and procedures
 - e. Incident reporting policies and procedures
 - f. Sanction policies and procedures
 - g. Termination procedures
 - h. Risk Assessment
 - i. Risk Management

Section C: Access to Data		
Access to Client Paper Records	Section: C	Policy: 004

Scope:

Participating Agencies

Policy:

Participating Agencies will establish procedures to handle access to client paper records.

Purpose:

To ensure information security protocol.

Agencies shall follow their existing policies and procedures and applicable local, state, and federal regulations for access to client records on paper.

Each agency must secure any paper or other hard copy containing personal protected information that is either generated by or for the HMIS, including, but not limited to reports, data entry forms, and signed consent forms.

All paper or other hard copy generated by or for HMIS that contains private personal information (PPI) must be directly supervised with the hard copy is in a public area. When agency staff is not present, the information must be secured in areas that are not publically accessible. Written information specifically pertaining to user access (e.g., user name and password) must not be stored or displayed in any publicly accessible location.

All HMIS paper records that contain client information must be destroyed seven (7) years after the client has left the program

Section C: Access to Data		
Physical Access Control	Section: C	Policy: 004

Scope:

System Wide

Policy:

Physical access to the system HMIS system equipment and media must be controlled. Access must be controlled for the transportation of data and other computing resources. The level of control is contingent on the level of risk and exposure.

Purpose:

To identify standards to physical access to HMIS.

A. Access to Computing Facilities and Equipment:

- The Agency Point of Contact within the Participating Agency will determine the physical access controls appropriate for their organizational setting based on the security policies, standards, and guidelines discussed in this document.
- All those granted access to an area or to data are responsible for their actions. Additionally, those granting another person access to an area are responsible for that person’s activities.

B. Media and Hardcopy Protection, Transportation and Destruction:

- Printed versions of confidential data should not be copied or left unattended and open to unauthorized access.
- Open Doors Homeless Coalition HMIS data may be transported by authorized employees using methods deemed appropriate by the participating agency that meets the above standard.
- Reasonable care should be used and media should be secured when left unattended.
- Magnetic media containing confidential data that is released and/or disposed of from the Participating Agency should first be processed to destroy any magnetic data residing on that media.
- Degaussing and overwriting are acceptable methods of destroying data.
- Responsible personnel must authorize the shipping and receiving of magnetic media and appropriate records maintained.
- Open Doors Homeless Coalition HMIS information in hardcopy format should be disposed of properly. This may include shredding finely enough to ensure that the information is unrecoverable.

Section C: Access to Data		
Unauthorized Access Control	Section: C	Policy: 006

Scope:
 System Wide

Policy:
 Access to all of HMIS computing, data communications, and sensitive data resources will be controlled based on the user's needs. Access is controlled through user identification and authentication. Users are responsible and accountable for work done under their personal identification. Access control violations must be monitored, reported, and resolved.

Purpose:
To prevent unauthorized access to HMIS systems and data.

All users will be granted access to the system based on operational need as identified by the participating agency Executive Director. Need exists only for those agency staff, volunteers, or designated personnel who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities. All HMIS Software resources will be protected at all times by a firewall.

Users are responsible and accountable for work done under their personal identification. Access control violations must be monitored, reported, and resolved.

Any violations of access to the HMIS system should be immediately reported to either the Agency Point of Contact or the HMIS Coordinator.

Section C: Access to Data		
Unique User ID and Password	Section: C	Policy: 007

Scope:

System Wide

Policy:

Authorized user will be granted unique user ID and password. All Agency User accounts are the responsibility of Open Doors Homeless Coalition HMIS Administrator.

Purpose:

To ensure that only authorized user will be able to enter, modify or read data

Authorized users will be granted a unique user ID and password:

- Each user will be required to enter a User ID with a password in order to logon to the system
- User ID and Passwords are to be assigned to individuals
- The User ID will be no more than 10 characters
- The password must be no less than eight and no more than ten characters in length which should not be comprised of words, backward words, names, backward names or any identifiable acronym
- The password must be alphanumeric
- Users should use industry standard best practices when selecting their password including the following:
 - Use lower and upper case letters
 - Do not use passwords containing the names of a spouse, child, or pet (similar names or backward names, places or things) and do not use birthdates or other easy to guess items.
- Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location.

Password Reset:

- Initially each user will be given a password for one time use only. The first or reset password will be created by the HMIS System Administrator and will be issued by to the User. The System Administrator will reset a password if necessary.

Section C: Access to Data		
Unique User ID and Password	Section: C	Policy: 007

- o Unsuccessful login: If a user unsuccessfully attempts to logon three times, the user ID will be “locked out” on the next attempt and access permission will be revoked and the user will be unable to gain access until their password is reset. Users will contact the HMIS Coordinator to facilitate such a request.

Section C: Access to Data		
Right to Deny User and Participating Agencies' Access	Section: C	Policy: 008

Scope:

Participating Agencies

Policy:

Participating Agency or a user access may be suspended or revoked for suspected or actual violation of the security protocols.

Purpose:

To outline consequences for failing to adhere to information security protocols.

All potential violations of any security protocols will be investigated and a report given to the Open Doors Homeless Coalition HMIS Coordinator and Committee.

Any user found to be in violation of security protocols will be sanctioned accordingly. Sanctions may include, but are not limited to:

- A formal letter of reprimand;
- Suspension of system privileges;
- Revocation of system privileges;
- Criminal prosecution.

Any agency that is found to have consistently and/or flagrantly violated security protocols may have their access privileges suspended or revoked. The cost of any retraining of agency personnel on HMIS policies and procedures will be borne by the agency.

The Open Doors Homeless Coalition HMIS Coordinator at the directions of the Executive Board will impose any sanctions.

Section C: Access to Data		
Data Access Control	Section: C	Policy: 009

Scope:

System Wide

Policy:

Agency Point of Contact and the Open Doors Homeless Coalition HMIS Coordinator will monitor access to system software.

Purpose:

To indicate the standards and guidelines for data access control for the participating agency.

Agency Point of Contacts at Participating Agencies and the HMIS staff (including the Coordinator and System Administrator) reserve the right to monitor access to system software.

- o Agency Point of Contacts at Participating Agencies and the HMIS staff will regularly review user access privileges and deactivate users when users no longer require access.
- o Agency Point of Contacts at Participating Agencies and the HMIS staff may implement discretionary access controls to limit access to HMIS information based on application security designation. Examples of such designations include but are not limited to "Agency Point of Contact", "Case Manager" and "Volunteer"
- o Participating Agencies and the HMIS staff may audit unauthorized accesses and attempt to access HMIS information.
- o Audit records shall be kept at least six months, and Agency Point of Contacts and the HMIS staff may review and audit records for evidence of violations or system misuse.

Access control measures should include:

- o Access to computers within restricted areas should be controlled through a password or through physical security measures;
- o Each user should have a unique identification code;
- o Each user's identity should be authenticated through an acceptable verification process;
- o Passwords are the individual's responsibility, and users cannot share passwords;

Section C: Access to Data		
Data Access Control	Section: C	Policy: 009

- Users should be able to select and change their passwords, and must do so at least every 45 days. A password cannot be re-used until 2 password selections have expired.
- Passwords should not be able to be easily guessed or found in a dictionary. The password format is alphanumeric;
- Any passwords written down should be inaccessible to other persons; and
- Users should not store or use the “remember” function to store passwords on a personal computer for easier log on.

As a part of the monitoring process the following guidelines apply:

A. Monitoring:

- The HMIS Coordinator will conduct an annual programmatic review of the HMIS System to ensure compliance with the Vendor Agency (software manufacturer).
- Within two (2) weeks of any review, the HMIS Coordinator will, in writing, submit to the HMIS Committee and the Open Doors Homeless Coalition CoC any problems or deficiencies and a plan of correction concerning compliance with the agreement and program regulations.
- The HMIS Coordinator may authorize withholding of payments until the Vendor Agency is in compliance with the plan of correction.
- Should the Vendor Agency fail to remedy the deficiencies within the time frame provided, the Open Doors Homeless Coalition may terminate this Agreement and reclaim any payments for future periods that have been made, providing that notice is given to the Vendor Agency within 5 days.
- The Vendor Agency Staff will monitor compliance with the data security standards.
- All users and custodians are expected to report suspected instances of noncompliance.
- The Open Doors Homeless Coalition HMIS Committee will review standards violations and recommend corrective and disciplinary actions.

B. Violations: Any exception to the data security policies and standards not approved by the Open Doors Homeless Coalition HMIS Committee is a violation and will be reviewed for appropriate action that could include termination of contract or criminal prosecution.

Section C: Access to Data		
Data Access Control	Section: C	Policy: 009

C. Exceptions: All exceptions to these standards are to be requested in writing by the Executive Director of the appropriate agency and approved by the HMIS Coordinator and/or the HMIS Committee or both.

Section C: Access to Data		
Audit Data Logs	Section: C	Policy: 011

Scope:

System Wide

Policy:

The HMIS Coordinator will maintain accurate logs of all changes made to the information contained within the database

Purpose:

To maintain an audit trail of all authorized and unauthorized changes to client records.

All changes to the data contained within the Open Doors Homeless Coalition HMIS system will be logged constantly and audited regularly. HMIS Software maintains an audit trail that will track client-related activity. Any time a client page is added, edited, deleted, or viewed by a HMIS Software user, that information will be logged. The HMIS Coordinator will periodically review the log of changes and investigate unusual changes

Section C: Access to Data		
Data Assessment and Access	Section: C	Policy: 012

Scope:

System Wide

Policy:

All data will be handled according to the classifications below

Purpose:

To identify the categories of data and indicate the type of controls required for enforcing and maintaining security standards.

The HMIS Coordinator will assess all data and implement appropriate controls to ensure that data classified as public domain data, internal data, restricted data and confidential data are handled according to the following procedures.

A. Classifications:

- *Public data* – information approved for publication by the Open Doors Homeless Coalition.
- *Internal data* – information scheduled, but not yet approved, for publication. Examples include draft reports, fragments of data sets, or data without context.
- *Restricted data* – information not ever scheduled for publication. Examples include data sets that are unassociated with any official project or data that have not been analyzed.
- *Confidential data* – information that identifies clients contained within the database. Examples include social security numbers, names, address or any other information that can be leveraged to identify a client.

B. Procedures for transmission and storage of data

- *Public data* – security controls not required.
- *Internal data* – accessible only to internal employees. No auditing is required. No special requirements around destruction of these data are required. These data must be securely stored and can be transmitted via internal or first-class mail.
- *Restricted data* – need to know access only. Requires auditing of access and must be stored in a secure location. All restricted data will be shredded. If mailed internally must be labeled confidential; can be mailed first class.

Section C: Access to Data		
Data Assessment and Access (cont'd)	Section: C	Policy: 012

- *Confidential data* – requires encryption at all times. Hard copies of these data should never be produced. Must be magnetically overwritten and the destruction must be verified by System Administrator. These data can only be delivered by hand to data owner.

All data must be classified public, internal, classified or confidential. All data must be handled according to their classification. Failure to handle data properly is a violation of this policy.

Section C: Access to Data		
Data Integrity Controls	Section: C	Policy: 013

Scope:

System Wide

Policy:

Controls must exist to ensure data remain consistent with their source

Purpose:

To delineate the categories of data integrity controls that the HMIS Coordinator and all Participating Agencies will apply. To indicated the type of integrity controls required for enforcing and maintaining integrity standards.

Data integrity controls must encompass both manual and electronic processing. Errors, duplications, omissions and intentional alterations should be discovered and investigated. Many data integrity controls and enforcement procedures are built into HMIS Software. Only authorized personnel are permitted to access to authorized records. Neither the HMIS Coordinator nor the software manufacturer will change data in the back-end of the system.

Section C: Access to Data		
Local Data Storage	Section: C	Policy: 014

Scope:

Participating Agencies

Policy:

Client records containing identifying information that are stored within the Participating Agency's local computers are the responsibility of the Participating Agency.

Purpose:

To delineate the responsibility that Participating Agencies have regarding client-identifying data.

Participating Agencies should develop policies for the manipulation, custody, and transmission of client-identified data sets stored on local computers.

Section C: Access to Data		
Transmission of Client Level Data	Section: C	Policy: 015

Scope:

System Wide

Policy:

Client data will be transmitted in such a way as to protect client privacy and confidentiality.

Purpose:

To provide guidelines regarding security of client level data during transmission.

The HMIS Coordinator of Open Doors Homeless Coalition HMIS must be aware of access-control vulnerabilities for the transmission of data within the network. Participating Agencies should be aware of the costs to implement secure engineering solutions. However, steps must be taken to ensure proper solutions for security of the data, not necessarily those of the least cost. Transmission of data is vulnerable to:

- 1) unauthorized users
- 2) loss of connection to Internet or HMIS Software
- 3) unauthorized use by authorized users.

If a breach in security of HMIS data is discovered, staff should notify their Executive Director or Agency Point of Contact who will communicate with ODHC's HMIS Coordinator. Resolution will be identified and a corrective action plan developed to ensure the future security of the system.

Section C: Access to Data		
Data Release Authorization and Distribution	Section: C	Policy: 016

Scope:

System Wide

Policy:

The HMIS Coordinator, Open Doors Homeless Coalition, and Participating Agencies will follow outlined procedures for the release of all data.

Purpose:

To outline the procedures for the release of data.

Continuum Reporting and Release of Data

All data are to be released by Open Doors Homeless Coalition in aggregate format must represent at least 60% of the clients in the database.

Release of data principals for Participating Agencies:

- Program specific information will not be released without the written consent of the Participating Agency Executive Director.
- There will be full access to aggregate data for all Participating Agencies.
- Aggregate data will be available in the form of an aggregate report or as a raw data set.
- Aggregate data will be made directly available to the public as needed.
- Parameters of the aggregate data, that is, where the data comes from, what it includes, and what it does not include will be presented with each report.
- A meeting of the Open Doors Homeless Coalition HMIS Committee shall be called when approval is required for release of data that do not meet the 60% release rate.

Written Client Consent Procedure

Client procedures from Participating Agency, including permission to enter data into the HMIS system and release of information for sharing client data, must be on file at each agency.

Each Participating Agency must publish the HMIS privacy notice describing policies and practices for processing Protected Personal Information (PPI) and must provide a copy of this privacy notice to any individual upon request. If the Participating Agency maintains a web

Section C: Access to Data		
Data Release Authorization and Distribution (cont'd)	Section: C	Policy: 016

page, the current privacy notice must be posted. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. All amendments to the privacy notice will be consistent with the requirements of these privacy standards. HMIS will maintain permanent documentation of all privacy notice amendments. Lastly, Participating agencies are reminded that they are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include, but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. In addition, Participating Agencies that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of the languages are found in significant numbers and come into frequent contact with the program.

The PPI policy will specify the purpose for which it collects PPI and will describe all uses and disclosures. A PA may use or disclose PPI from the HMIS only if the use or disclosure is allowed by the HUD HMIS Final Notice, and is described in this privacy notice. HIPAA regulation receives precedent over the HUD Final Notice PPI policies. HMIS Policy requires written as well as oral consent as a fundamental component of the concept related to informed consent. Except for the first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures are permissive and not mandatory. Uses and disclosures not specified in the privacy notice can be made with the consent of the individual or when required by law.

A Participating Agency must allow an individual to inspect and have a copy of any PPI about the individual. A Participating Agency must offer to explain any information that the individual may not understand. While a PA must consider any request by an individual for correction of any inaccurate or incomplete PPI pertaining to the individual, the PA is not required to remove any information but may alternatively choose to make information as inaccurate or incomplete and may supplement it with additional information. A PA –in accordance with HUD’s Final Notice – may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individuals PPI:

Section C: Access to Data		
Data Release Authorization and Distribution	Section: C	Policy: 016

- Information compiled in reasonable anticipation of litigation or comparable proceeding
- Information about another individual (other than a health care or homeless provider)
- Information obtained under promise of confidentiality (other than a promise from a healthcare or homeless provider) if disclosure would reveal the source of information or information in the disclosure which would reasonably likely to endanger the life or physical safety of any individual.

Also a PA may reject repeating or harassing request for access or correction. A PA that denies an individual request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the protected personal information about the individual.

Section C: Access to Data		
Right to Deny Access to Client Identified Information	Section: C	Policy: 017

Scope:

System Wide

Policy:

Each Participating Agency retains authority to deny access to all identifying client information contain within the system.

Purpose:

To protect client confidentiality.

No data will be released to any person, agency, or organization that is not the owner of said data.

Any request for client identifying data from any person, agency, or organization other than the owner will be forwarded to the Open Doors Homeless Coalition HMIS Committee for review. Pursuant to Open Doors Homeless Coalition policy, any outside entity must obtain written consent of every client contained within the database prior to the release of the data.

Using HMIS Data for Research

Agencies participating in HMIS should collect personal client information only when appropriate to provide services and/or for other specific purpose of the organization and/or when required by law. Purposes for which agencies collect protected personal information may include the following:

- o To provide or coordinate services to clients
- o To locate other programs that may be able to assist clients
- o For functions related to payment or reimbursement from others for services that are provided
- o To operate the agency, including administrative functions such as legal, audits, personnel, oversight, and a management functions.
- o To comply with government reporting obligations
- o When required by law
- o For research purposes

Section C: Access to Data		
Right to Deny Access to Client Identified Information (cont'd)	Section: C	Policy: 017

HMIS Release of Data for Research Conditions

- o No client protected information for any reason may be released to unauthorized entities.
- o Only de-identified aggregate data will be released.
- o Aggregate data will be available in the form of an aggregate report or as raw data set. Parameters of the aggregate data, that is, where the data comes from what it includes will be presented with each report.
- o Research results will be reported to the HMIS Committee prior to publication, for publication approval by the HMIS Committee.
- o Research will be shared with the appropriate agencies after publication
- o HMIS Committee will be granted the rights to utilize the findings (results).

The HMIS Committee will review and respond to requests for the use of HMIS data for research.

Section D: Technical Support		
Planned Technical Support	Section: D	Policy: 001

Scope: System Wide

Policy:

HMIS vendor and Open Doors Homeless Coalition HMIS Coordinator will offer a standard technical support package to all Participating Agencies.

Purpose:

To describe elements of the technical support package.

The Open Doors Homeless Coalition’s HMIS Coordinator will provide technical assistance to Partner Agencies on use of HMIS Software, including:

- Assist Participating Agencies on the use of Entry/Exit forms and other paperwork
- Conduct on-site follow-up training if needed
- Coordinate follow-up data entry training if needed
- Review report generation
- Coordinate ongoing technical assistance as needed
- Assist agencies with network and end user computer security
- Create custom reports, in accordance with the HMIS Committee Guidelines and recommendations
- Assisting in the development of program specific interview protocol.

Issues for which technical support is available include:

- Implementation support
- Technical support
- Reporting support
- Training
- Programmed reports
- Production of published reports

HMIS Coordinator is available 8:00 am – 5:00 pm Monday through Friday and by cell phone after hours.

Section D: Technical Support		
Participating Agency Service Requests	Section: D	Policy: 002

Scope: Partner Agencies

Policy:

Open Doors Homeless Coalition's HMIS Coordinator will respond to requests for services that arrive from the Agency's Executive Director or the Agency's Point of Contact.

Purpose:

To outline the proper methods of communicating a service request from a Partner Agency to the HMIS Coordinator.

To effectively respond to service requests, the following methods of communicating a service request from a Participating Agency to the HMIS Coordinator have been developed:

- End user informs Agency Management Staff (Executive Director/designee or Point of Contact) of the problem
- Agency Management Staff attempts to resolve the issue. If unable to do so, agency staff may contact the HMIS Coordinator directly in order to request expedited service.
- HMIS Coordinator determines resources needed for service and if necessary, contacts the HMIS Administrator for support.
- The HMIS Administrator will determine if software vendor support is needed to resolve the issue.
- HMIS Coordinator contacts agency management staff to work out a mutually convenient service schedule and resolution to issue or concern.

Chain of communication: (Problems should be resolved at the lowest possible level to assure minimum time to resolve. Issues resolved at the higher level will be communicated back through the chain in reverse order.

1. End User
2. Agency Staff
3. HMIS Coordinator
4. HMIS Administrator
5. Vendor

Section D: Technical Support		
Availability and Hours of Technical Support	Section: D	Policy: 003

Scope: System Wide

Policy:

HMIS Software will be operational 24 hours a day, 365 days a year, excluding natural disaster, or Federal or State declared emergency situations.

Purpose:

To delineate the availability of the system and the times the HMIS Coordinator will be available to resolve technical issues

A. Planned interruption to service:

The HMIS Coordinator will notify Participating Agencies via email and/or fax of the interruption to service. An explanation of the need for the interruption will be provided and expected benefits or consequences articulated.

B. Unplanned interruption to service: Participating

Agencies may or may not be notified in advance of unplanned interruption to service. Participating Agencies will be notified of unforeseen interruptions to service that are expected to exceed two hours.

C. Service restoration:

The HMIS Coordinator will notify Participating Agencies via email and/or fax that service has resumed.

D. Technical Assistance:

HMIS Coordinator are available for Technical Assistance, questions and troubleshooting between the hours of 8:00 am and 5:00 pm Monday – Friday and by cell phone after hours, excluding city, state, and federal holidays. Occasional downtimes may occur for upgrade/minor repair procedures.

Section E: Implementation		
Stage 1: Planning	Section: E	Policy: 001

Stage 1: Planning:

Prior to the beginning of Stage 1, a participating agency needs to have:

1. Completed security assessment including all participation and data sharing agreements as well as client consent protocols.
2. Identified an Agency Point of Contact; and
3. Made proper connectivity arrangements. Because there is a great quantity of data transfer, HMIS requires that the participating agency have a Broadband Internet connection greater than 56K/90v. This includes DSL, Cable, or Satellite Internet access. This Broadband Internet requirement will avoid lost staff time and staff frustration.

During Stage 1 of implementation of HMIS:

1. Participating Agency staff and HMIS staff meet for the Security assessment meeting.
2. HMIS staff and Agency Point of Contact will arrange a follow-up site visit to conduct operative tests on the program's equipment should this be needed.

Indicators to exit stage

The participating agency must complete all Stage 1 activities before moving onto stage 2 including signed Partnership agreement and data sharing agreements returned to the HMIS Coordinator.

For Stage 1 implementation HMIS staff will assist Participating Agencies in the completion of all required documentation prior to implementation.

On Site Security Assessment meeting:

As defined in Policy ____, Agency staff will meet with HMIS staff member who will assist in completion of Agency's Information Security Protocols.

Agency Agreement:

The Agency Agreement refers to the document agreement made between the participating agency and the Open Doors Homeless Coalition Continuum of Care. This agreement includes commitment to enter information on clients served within the agency's participating programs. This document is the legally binding document that refers to all laws relating to privacy protections and information sharing of client specific information.

Section E: Implementation		
Stage 1: Planning (cont'd)	Section: E	Policy: 001

User Agreement:

This form is signed by the case managers and agency administrator to allow them access to the HMIS system. Users must participate in training before given live access to the HMIS system.

Identification of Referral Agencies:

HMIS will develop process to track referrals to agencies not participation in HMIS.

Participating agency referrals are tracked in the HMIS using the Placement Tool:

clients are placed into local agency services or referred to another agency's services. Reporting tools are available to report these activities.

Section E: Implementation		
Stage 2: Startup and Initial Training	Section: E	Policy: 001

Scope: System Wide

Policy:

A Participating Agency must complete Phase 1 implementation

Purpose:

To define Phase 1 of the implementation process and identify the requirements to enter Phase 1. To delineate the indicators for proceeding to the next stage of implementation.

To enter Stage 2, the Participating Agency needs to have completed Stage 1.

Activities during State 2 of Implementation include:

- HMIS Coordinator facilitates the creation of user IDs and temporary passwords for all users.
- Site users and the Agency Point of contact receive training on uses of the HMIS application. The Point of Contact training will include Program and Services management.
- Trained agency staff work to enter client data into the system using the processes taught during the training. These are different for HUD-funded agencies and non-HUD funded agencies.

The HMIS Stage 2 continues until data has been entered on 100% of the clients served for an entire month for all clients served within the Participating Agency. This includes both basic client data, and the program/service data required to support the production of the HUD APR or other required reports.

Indicators to exit Stage 2:

- Interview protocols have been established including
 - Implementation of standard default interview protocols
 - Use of interview protocols and
 - Data entry including entry and exit transactions.
- Data has been entered on 100% of all new or current clients served within participating programs for an entire month for all clients served with in the Participating Agency.
- Agency services have been defined in HMIS and clients are being placed into them for an entire month.

Section E: Implementation		
Stage 2: Startup and Initial Training (cont'd)	Section: E	Policy: 001

Participating Agencies need to complete all Stage 2 Activities before moving onto the final Stage 3.

Section E: Implementation		
Stage 3: Operational Status	Section: E	Policy: 001

To enter Stage 3 Data entry must be completed for 100% of clients served for an entire month.

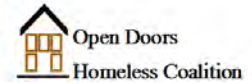
Stage 3 implementation begins when staff utilizes the HMIS application to maintain client records, including service information.

Benefits of Stage 3 include:

- Client and Service Data is available for reporting purposes
- Required reporting can easily be generated including:
 - HUD APR
 - Demographics, including income sources, amounts and non-cash benefits.
 - Residential history patterns.

Participating Agencies will receive support from HMIS staff to complete all stages. To ensure that all parties are comfortable with the process and progress for this stage, the Participating Agency and HMIS staff may meet to assess obstacles to progress if they exist.

Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Data Quality Roles and Responsibilities	Section: F	Policy: 001 Page 1 of 2

Scope:

Continuum Wide

Policy:

Responsibilities for data quality will be clearly identified.

Purpose:

To ensure clarity of the roles and responsibilities for all parties involved in ensuring data quality in HMIS.

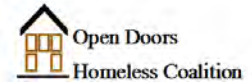
Open Doors Homeless Coalition Board of Directors: The Board provides authorization and oversight to the Quality Management (QM) Committee. The Board will support the efforts of the committee by enforcement of compliance to data quality standards as outlined in this document.

Quality Management (QM) Committee: The QM Committee is responsible for oversight of the Quality Management staff. They will review monthly data quality reports, work with providers to identify steps necessary to correct data and/or data collection processes, keep a running monthly spreadsheet that identifies changes in compliancy levels, work with the Quality Management Coordinator to identify training needs, report problems with providers to the CoC Board of Directors, and report on progress to the general CoC membership.

Executive Director: The Executive Director of Open Doors Homeless Coalition is responsible for supervising the Quality Management staff and ensuring all auditing and site-visits occur in a timely manner. He/She reports to the Board any barriers to policy adherence and any issues that may result in funding reallocations as determined by the Quality Management Committee.

Quality Management Staff: The Quality Management Coordinator staff is responsible for two functions: 1) generating and distributing data quality reports to authorized parties; and 2) conducting training, including one-on-one training on how to correct the data entered into the system. The Quality Management Coordinator performs these functions under the guidance of the QM Committee, or in its absence, the CoC Board of Directors.

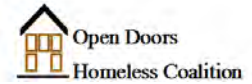
Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Data Quality Roles and Responsibilities	Section: F	Policy: 001 Page 2 of 2

Providers/Agencies: Providers are responsible for entering and correcting data in accordance with the data quality plan. The provider’s Executive Director is responsible for the oversight of intake and data entry to ensure quality data collection and consistent entry practices.

**Open Doors Homeless Coalition
Policy & Procedures**



Section F: Data Quality Plan		
Timeliness	Section: F	Policy: 002

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

All Agencies will enter client data into the HMIS system in a timely manner as outlined below.

Purpose:

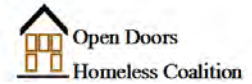
To ensure timeliness standards are met for HMIS data.

Rationale: Entering data in a timely manner can reduce human error that occurs when too much time has elapsed between data collection (or service transaction) and the data entry. The individual performing the data entry may be relying on handwritten notes or their own recall of a case management session, a service transaction, or a program exit date; therefore, the sooner the data is entered, the better chance the data will be correct. Timely data entry also ensures that the data is accessible when it is needed, either proactively (e.g., monitoring purposes, increasing awareness, meeting funded requirement), or reactively (e.g., responding to request for information, responding to inaccurate information) and helps to ensure participation in HMIS.

All data shall be entered into the HMIS system in a timely manner. To that end, the following timeliness benchmarks are set forth:

- Emergency Shelter programs: All Universal Data Elements entered within two days of intake
- Transitional Housing: All Universal and Program-Specific Data Elements entered within seven days of intake.
- Permanent Housing: All Universal and Program –Specific Data Elements entered within seven days of intake.
- Outreach programs: Limited data elements entered within two days of the first outreach encounter. Upon engagement for services, all remaining Universal Data Elements entered within two days.
- HPRP and Prevention Programs: All Universal and Program Specific data Elements entered within two days of intake.

**Open Doors Homeless Coalition
Policy & Procedures**



Section F: Data Quality Plan		
Completeness	Section: F	Policy: 003

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

All Agencies will enter complete client data into the HMIS system to the fullest extent possible based upon client disclosure.

Purpose:

To ensure standards for data completeness in the HMIS system.

Rationale: Partially complete or missing data (e.g., missing digit(s) in a SSN, missing the year of birth, missing information on disability or veteran status) can negatively affect the ability to provide comprehensive care to clients. Missing data could mean the client does not receive needed services – services that could help them become permanently housed and end their episode of homelessness.

All data entered into the HMIS shall be complete.

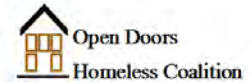
The Continuum’s goal is to collect 100% of all data elements. However, the Continuum recognizes that this may not be possible in all cases. Therefore, the Continuum has established an acceptable range of null/missing and unknown/don’t know/refused responses of between 1 and 5 percent, depending on the data element and the type of program entering data.

Complete HMIS data is necessary to fully understand the demographic characteristics and service use of persons in the system. Complete data facilitates confident reporting and analysis on the nature and extent of homelessness such as:

- Unduplicated counts of clients served at the local level
- Patterns of use of people entering and exiting the homeless assistance system: and
- Evaluation of the effectiveness of homeless systems.

In effect, complete data tells the full “story of homelessness to the agencies, the Continuum and the general public.

Open Doors Homeless Coalition
Policy & Procedures



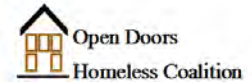
Section F: Data Quality Plan		
Completeness (cont'd)	Section: F	Policy: 003

Complete data also helps the CoCs meet funded compliance requirements. In the HUD 2009 Continuum of Care funding application, applicants were asked to “indicate the percentage of unduplicated client records with null or missing values on the date of the point-in-time count was conducted.” This demonstrates HUD’s commitment to completeness of data and accurate reflection of the true picture of homelessness in the continuum.

Clients Served:

One hundred percent (100%) of all homeless residential clients are to be entered into HMIS with a minimum of the Universal Data Elements as identified by HUD standards.

Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Accuracy and Consistency	Section: F	Policy: 004

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

All Agencies will enter accurate client information in HMIS.

Purpose:

To ensure data quality and validity by entering accurate client data into HMIS.

Data Accuracy:

The purpose of accuracy is to ensure that the data in the CoC's HMIS is the best possible representation of reality as it relates to homeless people and the programs that serve them.

To that end, all data entered into HMIS shall be a reflection of information provided by the client, as documented by the intake worker, or otherwise updated by the client and documented for reference. Recording inaccurate information is strictly prohibited.

Consistency:

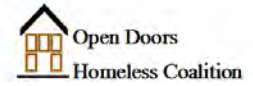
All data in HMIS shall be collected and entered in a common and consistent manner across all programs.

To that end, all intake and data entry workers will complete an initial training before accessing the live HMIS system. All HMIS users must recertify their knowledge of consistency practices on an annual basis.

A basic intake format that collects data in a consistent manner will be available to all programs, which they can alter to meet their additional needs, provided the base document does not change.

A document that outlines the basic data elements collected on the intake form, their response categories, rationale, and definitions will be made available in paper and via the HMIS website as a quick reference to ensure consistent data collection.

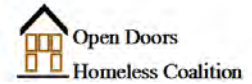
Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Accuracy and Consistency (cont'd)	Section: F	Policy: 004

New agencies that join the CoC are required to review this document as part of the HMIS Agency Agreement execution process.

Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Monitoring	Section: F	Policy: 005

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

The Continuum's Quality Management Committee and ODHC Staff are responsible for monitoring data quality throughout the system on a monthly basis.

Purpose:

To monitor Agencies' compliance with HUD's HMIS Data quality Standards.

Open Doors Homeless Coalition recognizes that the data produced from HMIS is critical to meet the reporting and compliance requirements of individual agencies and the CoC as a whole. As such, all HMIS agencies are expected to meet the data quality benchmarks described in this document.

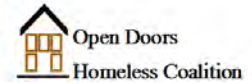
To achieve this, the HMIS data will be monitored on a monthly basis to quickly identify and resolve issues that affect the timeliness, completeness, and accuracy of the data. All monitoring will be done in accordance with the data quality monitoring plan, with the full support of the CoC membership.

The purpose of monitoring is to ensure that the agreed-upon data quality benchmarks are met to the greatest possible extent and that data quality issues are quickly identified and resolved.

To ensure that service providers have continued access to the expectations set forth in the data quality pan, the following protocol will be used:

1. Access to the Data Quality Plan: The data quality plan will be posted to the CoC's public website.
2. Access to Data Quality Reports: The Quality Management Coordinator will make the Data Quality Reports available to each agency by the 15th of the month.
3. Data Correction: Participating agencies will have 10 days to correct data. The Quality Management Coordinator will make updated reports

**Open Doors Homeless Coalition
Policy & Procedures**



Section F: Data Quality Plan		
Monitoring (cont'd)	Section: F	Policy: 005

available by the 30th of each month revised data quality reports for posting to the CoC’s public website on a quarterly basis. Should an agency disagree with findings on any report, they may exercise their right to file a grievance which will be reviewed by the Committee and the Board of Directors prior to publication of contested results.

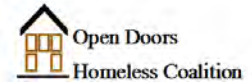
4. Monthly Review: The CoC QM Committee will review participating agency data quality reports for compliance with data quality benchmarks. ODHC Staff will work with participating agencies to identify training needs to improve data quality.
5. Public Review: On the last day of each quarter, the Quality Management Coordinator will post agency aggregate data quality reports for the previous quarter to the CoC’s public website.
6. CoC Review: The CoC QM Committee will provide a brief update on progress related to the data quality benchmarks at the monthly CoC meeting.

Agencies that meet the data quality benchmarks will periodically be recognized by the CoC QM Committee.

For agencies that fail to meet the data quality benchmarks, the CoC will ask the agency to submit a written plan that details corrective action. The plan shall be submitted to, and monitored by, the CoC’s QM Committee. Should the problem persist, the QM Committee shall make a recommendation to the Board to suspend the agency’s HMIS access and will contact the appropriate state and federal funders.

All Agencies have the right to appeal decisions made by the Committee and file a grievance if they feel actions taken are not warranted.

**Open Doors Homeless Coalition
Policy & Procedures**



Section F: Data Quality Plan		
Outcomes Monitoring	Section: F	Policy: 006

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

The Continuum's Quality Management Committee and staff are responsible for tracking and evaluating funded agency outcomes on a monthly and quarterly basis.

Purpose:

To systematically evaluate agency compliance with HUD and CoC outcome expectations.

Rationale:

HUD's funded programs have minimum performance requirements.

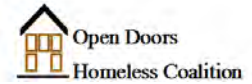
Outcomes are measures used to identify ways in which services have resulted in improved self-determination, self-sufficiency, and housing stability. Outcomes are an overall measure of efficacy of services provided to homeless clients and their families.

Benchmarks are specific quantifiable outcomes. Existing benchmarks include the following:

- At least 77% of persons who move into Permanent Housing Projects remain housed for at least 6 months.
- At least 65% of persons who leave Transitional Housing Projects will move into Permanent Housing.
- At least 20% of clients exiting Transitional and Permanent Supportive Housing programs will be employed.
- At least 50% of clients exiting Transitional and Permanent Supportive Housing programs will have maintained or increased income.

In addition to the above stated outcomes, Agencies will also be evaluated on performance noted in their Exhibit II application for the current grant year.

Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Site Visits/Audits	Section: F	Policy: 007

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

The Quality Management Committee is responsible for monitoring funded agencies 6 months prior to contract renewal.

Purpose:

To ensure compliance with documentation, habitability, fiscal responsibility, HMIS data quality and performance standards

Rationale:

ODHC monitoring is intended to serve as an evaluation of shelter service provision and compliance with HUD and CoC standards. Information obtained during monitoring is utilized in the rating and review process for CoC Grant Competition in addition to ongoing Quality Improvement efforts for the Continuum.

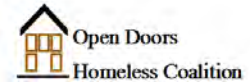
Areas monitored during the monitoring process include:

1. Habitability: The physical site of the agency is evaluated for safety and habitability in alignment with HUD SHP self-monitoring tool.
2. File Audits: Case files are audited to determine if minimum documentation standards are met. Information in the case file is compared to that in HMIS to ensure consistency and accuracy of information provided to ODHC via HMIS.

Ten percent (10%) of files are chosen at random from the Agency's admission records in HMIS and those client files are reviewed the day of the scheduled site visit. Names are not provided in advance of the site visit.

2. Financial/Fiscal Responsibility: An agency's draw history is evaluated as is their capacity to manage grant funds. This audit includes a review of

**Open Doors Homeless Coalition
Policy & Procedures**



Section F: Data Quality Plan		
Site Visits/Audits	Section: F	Policy: 007

financial policies, statements, audits, and matching documentation.

The monitoring process is as follows:

Notification to the Agency: ODHC staff will contact the agency Director or designee to coordinate a date for the physical audit. A letter is sent to the agency at least two weeks prior to the identified date which confirms agreed upon audit appointment, clarifies the audit process, and requests the attendance of agency administrators.

Site Visit Confirmation Call: The purpose of the confirmation call is as follows:

- o Explain the monitoring/audit process
- o Identify/confirm key program staff who will assist during the site visit
- o Confirm logistics, address, and meeting time for physical inspection

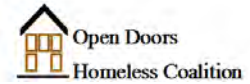
The Assessment Process: The "real work" of monitoring entails interviews, file reviews to verify and document compliance and performance, and a physical inspections of the premises.

Exit Conference: At the end of the site visit, ODHC staff and Quality Management Committee members present conduct an exit conference with the appropriate agency staff to discuss preliminary conclusions and the next steps in the process.

Presentation of Results to Committee: The Quality Management Coordinator and Executive Director will present any findings to the Committee for consideration. A finalized report will be provided to the agency with recommendations and the appeal process should they disagree with findings noted.

Monitoring Conclusions:

Open Doors Homeless Coalition Policy & Procedures



Decision Categories: As a result of monitoring, the ODHC Quality Management Committee may reach one or more of the following conclusions in each audit category:

Section F: Data Quality Plan		
Site Visits/Audits	Section: F	Policy: 007

- Satisfactory: all requirements were met
- Unsatisfactory: all requirements were NOT met; findings are noted and require corrective action.

All conclusions - positive or negative - must be supportable, defensible, and adequately documented.

Findings and Concerns:

Findings. Findings are a clear violation of regulations or standards established by the CoC. All findings must include the condition, criteria, cause, effect, and required corrective action. The agency must respond to the Quality Management Committee in writing with resolutions and related timelines. This plan is submitted to the Board for approval.

Concerns. Concerns are areas of improvement that may enhance service provision. These matters are noted in the audit/site visit report with recommendations for improvement.

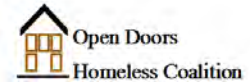
Monitoring Letter

Within 60 days after completion of monitoring, the ODHC QM Coordinator, in coordination with the Executive Director and Quality Management Committee, documents results of the site visit/audit for agency staff. This letter includes any findings, concerns, recommendations and required actions as agreed by the Quality Management Committee.

Appeals/Grievance:

Any agency may appeal the decision of the Committee. Please see policy B.005 for guidelines and procedure.

Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Appeals and Grievances	Section: F	Policy: 008

Scope:

Open Doors Homeless Coalition Participating Agencies

Policy:

All agencies have the right to appeal decisions made by Committees or ODHC Staff members that effect their operations or reputation within the continuum.

Purpose:

To offer agencies a set of guidelines to follow in the event they disagree with findings or actions by any committee or ODHC staff member.

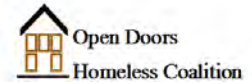
Filing a Grievance/Appeal

Any agency that feels a decision issued by a ODHC Committee or employee is biased or unwarranted should immediately report the matter to the Executive Director or Board Chair. The ODHC representative will document such reports and initiate the appeal/grievance process. Verbal communication must be followed up with a letter outlining the facts related to the grievance/appeal being filed and the basis of the appeal/grievance. Noted concerns will be addressed and settled by examination and discussion of the facts. Adverse action or retaliation will not be taken against an agency that reports or participates in the grievance/appeal process. Violation of this policy will not be permitted and may result in disciplinary action, up to and including discharge.

Grievance/Appeal Review

The Executive Director and Board of Directors are responsible for administering company policies, procedures, and regulations without discrimination, and in a manner which ensures fair treatment to all member agencies and their representatives.

Open Doors Homeless Coalition
Policy & Procedures



Section F: Data Quality Plan		
Appeals and Grievances	Section: F	Policy: 008

Upon receipt of the written grievance/appeal, the matter will be researched, facts will be gathered, and the issue will be raised at the next scheduled board meeting. No grievance or appeal will remain unresolved for more than 45 days and a special meeting may be called in matter affecting an agency's fiscal or operational functioning.

The Agency originating the grievance/appeal will have the opportunity to present their concerns to the board for consideration. Other parties may also be requested to appear and present information related to the issue as needed.

Grievance/Appeal Decisions:

The Board will review all available information and a motion will be made for appeal/grievance actions. A majority vote must be obtained to finalize any proposal. Board decisions will be presented to the agency within 45 days of receipt of formal request. All Board Decisions are final and will be documented in the Board Meeting Minutes along with all information presented for the case.

Open Doors Homeless Coalition
HMIS Policy & Procedures

Appendix A: Agency Participation Agreement

Open Doors Homeless Coalition - Continuum of Care
HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)
PARTICIPATION AGREEMENT

This Participation Agreement is entered into on the date hereinafter set forth by and between Open Doors Homeless Coalition Continuum of Care, hereinafter referred to as ODHC-COC, and _____, hereinafter referred to as the Agency, for purposes of providing HMIS connectivity in order to accurately record and report homeless data. The Agency has agreed to participate in the ODHC-COC HMIS and requests enrollment.

This Agreement shall remain in force as long as the Agency remains a member in good standing with ODHC-COC. The Agency may terminate this Agreement upon 30 days written notice if it no longer chooses to participate;

The Agency understands that HMIS will enable each Continuum of Care (COC) agency to enter individual client data about all homeless people we serve and report homeless housing and services activities.

All parties hereto agree to the following:

Agency Rights and Responsibilities:

- The Participating agency may not use HMIS participation, or data as a reason to deny services to a client;
- The Agency commits to entering truthful, accurate, complete, and timely information to the best of their ability on clients receiving homeless services;
- The Agency agrees to comply with HUD's Minimum HMIS Data Standards, including confidentiality, client consent and data entry requirements. The agency also agrees to assure that all employees and agents comply with these standards.

Client Consent:

- The Agency agrees to document informed client consent for each client entered into HMIS;
- The Agency agrees to maintain physical copies of client consent forms and other data entry supporting documentation for a minimum of three (3) years after client's case closes;

Open Doors Homeless Coalition HMIS Policy & Procedures

- The Agency agrees to allow clients to view their own HMIS data, upon written request.

HMIS Users:

- The Agency may designate and terminate users at their discretion. Only those authorized by the Agency may access HMIS;
- Each user will have a unique username and password, which governs the security level for that user;
- The Agency is responsible for supervision of users and assuring that security, confidentiality and data integrity are maintained;
- The Agency will report any breaches of confidentiality, consent, and actual and/or suspected misuse of data to the HMIS System administrator immediately;
- HMIS Administration may terminate individual user' access rights upon violation of confidentiality provisions. The Agency will be notified immediately by HMIS Administration. Termination of an individual user will not necessarily effect the agency's overall participation in the system.

System Hardware, Software and Connectivity:

- The Agency is responsible for maintaining computer system(s) provided ODHC-CoC, and purchasing security software and reliable high-speed internet access.

HMIS Data

- HMIS data is highly confidential. The Agency agrees not to use or disclose information other than as permitted or required by this agreement or as required by HUD's HMIS Minimum Data Standards;
- The Agency is responsible for the client data associated with their own program(s) and services;
- While acting within this agreement, the Agency has the ability to view, enter and edit information, enter unlimited numbers of clients and services and run an unlimited number of reports;
- Aggregated COC homeless data (not agency specific) will be published annually by ODHC-CoC;
- The ODHC-COC has an agreement with HMIS Administration to perform data quality assurance and security checks. The participating Agency grants HMIS Administration permission to access and utilize the data for the purposes of system administration, technical support and quality control.
- The ODHC-COC may use HMIS data for continuum planning, reporting and grant writing processes including Consolidated Plans, Gaps Analysis, and HUD reporting, and may

Open Doors Homeless Coalition HMIS Policy & Procedures

release aggregated data to BOS member agencies.

Shared Clients:

- Agencies that have formal, reciprocal partnerships agreements may share client level data. Signed partnership agreements must be provided to the HMIS Administrator in order for partnership level data sharing to be implemented. Note: Data regarding special needs or services related to HIV/Aids, mental illness, domestic violence or substance abuse may not be shared across multiple agencies and is at the discretion of the servicing agency.

HMIS System Responsibilities

- Agency users will have opportunities to provide feedback on the ongoing development of HMIS through user meetings, annual community progress updates or via email and telephone. Issues of concern may be brought to the ODHC-COC HMIS Advisory committee through a letter to the HMIS Committee chair.
- HMIS Administration will provide limited technical assistance for troubleshooting, report generation, and one-on-one and classroom training for users. Limited data entry assistance may be available to agencies that are experiencing substantial hardship in regard to data entry. Additional training and assistance is available.
- HMIS Administration will maintain the hardware and software required to support the HMIS system; perform regular data backups; and comply with industry standards for data security. The system administrator will make every effort to provide advanced notice to users if and when the system will be unavailable.

Eligibility and Termination

- The ODHC-COC is responsible for determining eligibility for participation.
- Should the Agency voluntarily terminate this agreement upon 30 days written notice if they no longer choose to participate, data already in the system will remain in the system; will continue to be used in aggregate reporting and for client searches (based on consent); and **will not** be removed;
- The ODHC-COC may terminate agencies that violate confidentiality or other provisions of this agreement through the following procedures: Agencies will be notified by the HMIS Director, verbally and in writing, of violations and issues. If violations are not resolved within two weeks of notification, the HMIS Director will notify the ODHC-COC. The ODHC-COC will rule on appropriate sanctions and processes including but not limited termination of participation.
- HMIS Administration may terminate individual user' access rights upon violation of confidentiality provisions. The Agency will be notified immediately by HMIS Administration. Termination of an individual user will not necessarily effect the agency's overall participation in the system.

Open Doors Homeless Coalition
HMIS Policy & Procedures

IN WITNESS WHEREOF, the foregoing instrument is executed on this the ____ day of _____, 2013.

Participating Agency
COC

Open Doors Homeless Coalition-

Name of Agency Representative

Name of ODHC-COC Representative

Signature of Agency Representative

Signature of ODHC-COC Representative

ATTEST:

ATTEST:

Open Doors Homeless Coalition HMIS Policy & Procedures

Appendix B: End User Agreement Open Doors Homeless Coalition HMIS END USER AGREEMENT

Fill in Agency Name: _____

Print Your Name: _____

This agency recognizes the primacy of client needs in the design and management of the Homeless Management Information System (HMIS). These needs include both the need continually to improve the quality of homeless and housing services with the goal of eliminating homelessness in our community, and the need vigilantly to maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care.

As the guardians entrusted with this personal data, HMIS users have a moral and a legal obligation to ensure that the data they collect is being collected, accessed and used appropriately. It is also the responsibility of each user to ensure that client data is only used to the ends to which it was collected, ends that have been made explicit to clients and are consistent with the mission to assist families and individuals in our community to resolve their housing crisis. Proper user training, adherence to the HMIS Policies and Procedures Manual, and a clear understanding of client confidentiality are vital to achieving these goals.

By executing this agreement you agree to abide by the following client confidentiality provisions:

- 1 A **Client Consent for Data Collection** Form must be signed by each client whose data is to be entered into the HMIS.
- 2 Personal User Identification and Passwords must be kept secure and are not to be shared.
- 3 Client consent may be revoked by that client at any time through a written notice except to the extent that consent has already been executed.
- 4 No client may be denied services for failure to provide consent for HMIS data collection.
- 5 Only general, non-confidential information is to be entered in the "other notes/comments" section of the Client Profile on the HMIS. Confidential information, including TB diagnosis, domestic violence and mental and/or physical health information, is not permitted to be entered in this section.
- 6 Clients have a right to inspect, copy, and request changes in their HMIS records.
- 7 HMIS Users may not share client data with individuals or agencies that have not entered into an HMIS Agency Agreement with this Agency without obtaining written permission from that client.
- 8 Discriminatory comments based on race, color, religion, national origin, ancestry, handicap, age, sex and sexual orientation are not permitted in the HMIS. Profanity and offensive language are not permitted in the HMIS.
- 9 HMIS Users will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities.
- 10 Any HMIS User found to be in violation of the HMIS Policies and Procedures, or the points of client confidentiality in this User Agreement, may be denied access to the HMIS.

Open Doors Homeless Coalition HMIS Policy & Procedures

I affirm the following:

1. I have received training in how to use the HMIS.
2. I have read and will abide by all policies and procedures in the HMIS Policies and Procedures Manual
3. I will maintain the confidentiality of client data in the HMIS as outlined above and in the HMIS Policies and Procedures Manual
4. I will only collect, enter and extract data in the HMIS relevant to the delivery of services to people experiencing a housing crisis in our community.

Your signature below indicates your agreement to comply with this statement of confidentiality. There is no expiration date of this agreement.

User's Signature Date

Witness Signature Date

Title Date

Executive Director's Signature Date

Open Doors Homeless Coalition HMIS Policy & Procedures

Appendix C: Client Consent for HMIS Data Collection

Open Doors Homeless Coalition
CLIENT CONSENT FOR HMIS DATA COLLECTION

This client notice and consent describes how information about you may be used and disclosed and how you can get access to this information. Please review it carefully. **If you have any questions or desire any further information regarding this form please contact _____ at _____.** Participation in data collection, although optional, is a critical component of the community's ability to provide the most effective services and housing possible. Please understand that access *to shelter and housing services is available without participation in data collection.*

I, _____ (insert client's name), understand and acknowledge that _____ (the "Agency") is affiliated with the Homeless Management Information System (HMIS), 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 HMIS database of collaborating agencies (list available), and **only to collaborating agencies**, who have entered into an HMIS Agency Participation Agreement and shall be used to:

- a) Produce a client profile at intake that will be shared by collaborating agencies
- b) Produce anonymous, aggregate-level reports regarding use of services
- c) Track individual program-level outcomes
- d) Identify unfulfilled service needs and plan for the provision of new services
- e) Allocate resources among agencies engaged in the provision of services
- f) Provide individual case management

___ (please initial) I understand and authorize the collection and maintenance of the following information:

(Initial appropriate information)

___ Identifying information (Name, birth date, social security number)

___ Demographic information (gender, race, residential information, family composition)

___ Letter to number code conversion for name and Date of Birth. Demographic information (gender, race, residential information, family composition)

___ Medical records (except HIV/AIDS and alcohol and drug treatment), Psychological records and evaluations, vocational assessment, care coordinators recommendations and direct observations, employment status, etc.

___ Financial information (income verification, public assistance payments, food stamps)

___ HIV/AIDS diagnosis

___ Substance abuse diagnoses, treatment plan, progress in treatment, discharge.

___ (please initial) 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.

___ (please initial) I understand that this release can be revoked by me at any time and that the revocation must be signed and dated by me. I further understand that this consent is subject to revocation at any time, except to the extent that the Agency has already taken action in reliance on it. If not previously revoked, this consent terminates automatically 1 year after my last treatment or discharge from Agency. I understand that my records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed without my written consent unless otherwise provided for in the regulations.

Additionally, I understand that participation in data collection is optional, and I am able to access shelter and housing services if I choose not to participate in data collection.

Date: _____ (Signature) _____

Open Doors Homeless Coalition
HMIS Policy & Procedures

Appendix D: Client Privacy Notice



**Open Doors Homeless Coalition
Continuum of Care
Privacy Notice**

The U.S Department of Housing and Urban Development (HUD) requires that each jurisdiction that receives funding from HUD have a Homeless management Information System (HMIS) in place. Therefore, this Agency is required to participate in the Mississippi Homeless Management Information System (HMIS), a computerized system that collects and stores basic information about the persons who receive services from this Agency. The goal of the Mississippi HMIS is to assist us in determining your needs and to provide a record for evaluating the services we are providing to you.

We only collect information that is needed to provide you services, and do not use or disclose your information without written consent, except when required by our funders or by law, or for specific administrative or research purposes outlined in our privacy policy. By requesting and accepting services from this program, you are giving consent for us to enter your personal information into the HMIS.

The collection and use of all personal information is guided by strict standards of confidentiality as outlined in our privacy policy. A copy of our agency's Privacy Policy is available upon your request for your review.

**Open Doors Homeless Coalition
HMIS Policy & Procedures**

Appendix E: HMIS User Change Request Form

HMIS User Change Request Form

Requesting Agency		Date	
User Information			
User Name		Email	
Condition	<input type="checkbox"/> New Hire <input type="checkbox"/> Position Change <input type="checkbox"/> Termination <input type="checkbox"/> Resignation	Effective Date	
User Contact #		Job Title	
Access Information (New Only)			
HPRP?	<input type="checkbox"/> Y <input type="checkbox"/> N	HMIS?	<input type="checkbox"/> Y <input type="checkbox"/> N
Agency Program Access	<input type="checkbox"/> All <input type="checkbox"/> Limited (identify specific programs below) _____ _____ _____ _____ _____		
Manager/Supervisor/Authorized Agency Approval			
Name:		Phone	
Email:			
Signature:			
HMIS Use Only			
Date Received: _____	Date Completed: _____	<input type="checkbox"/> User Notified (if new) <input type="checkbox"/> Supervisor Notified <input type="checkbox"/> User Log Updated	

Open Doors Homeless Coalition
HMIS Policy & Procedures

Appendix F: New Program Request Form

HMIS New Program Request Form

Agency Name		Date	
Address:		Website:	
Contact Information			
Agency Point of Contact		Job Title	
Phone Number(s)		Effective Date	
Fax Number		Email	
Program Information			
HPRP?	<input type="checkbox"/> Y <input type="checkbox"/> N	HMIS?	<input type="checkbox"/> Y <input type="checkbox"/> N
Program Name(s) <i>(must be different than agency name and can be specific to type)</i> <u>#Beds:</u> _____ <u>#Units:</u> _____	Name	Type	
	_____	_____	
	_____	_____	
	_____	_____	
	_____	_____	
Manager/Supervisor/Authorized Agency Approval			
Name:		Phone	
Email:			
Signature:			
HMIS Use Only			
Date Received:	Date Completed:	<input type="checkbox"/> User Notified (if new) <input type="checkbox"/> Supervisor Notified <input type="checkbox"/> User Log Updated	
_____	_____		

Open Doors Homeless Coalition
HMIS Policy & Procedures

Appendix G: User Issue Log
Homeless Management Information System

User Issue

Contact Name	Institution/Agency/Facility
Contact Telephone	Department/Program
Issue Received via: <input type="checkbox"/> Phone Call <input type="checkbox"/> Email <input type="checkbox"/> Survey Comment <input type="checkbox"/> Other: _____	Date the Request is Being Made

Issue Received by:

Resolved by:

Short Description

Activity toward resolution

Resolution:

Completion date:

Open Doors Homeless Coalition
HMIS Policy & Procedures



Appendix H: Report Request Form
Homeless Management Information System

Report Request Form

To help us meet your reporting needs, please provide us with the following details of your reporting requirements and e-mail to the HMIS Coordinator.

Contact Name	Institution/Agency/Facility
Contact Telephone	Department/Program
Contact E-mail Address	Date the Request is Being Made

Short Description – Please enter a short description of the report including the effective date (reporting period).

Totals/Subtotals required – Please enter fields you wish to be counted

Column Headings – Please enter details of required columns, field names, if known e.g. Client, Agency, Service, etc.

Similar Reports – Provide details or attach copies of any similar reports in order to reproduce format, calculations etc.

Required Output

Hard copy or electronic, spreadsheet, doc, etc

Report Name – Enter a suggested report name

Business Benefit/Dependencies – Please enter the business benefit of using this report and any dependencies

Preferred Completion date: Please enter the date you want the report by (this will be reviewed by the HMIS Coordinator and a date confirmed to you (if possible)).

Appendix I: HUD Universal Data Elements 2010

See: www.hmis.info for full report, descriptions, and updates