



**McHenry County  
Community Development**

**Homeless Management Information Systems  
Policies and Procedures Manual**



## **PURPOSE**

This document provides the policies, procedures, guidelines, and standards that govern the McHenry County Continuum of Care HMIS Partnering Agencies for contributing data to the HMIS. The McHenry County Community Development staff will provide each HMIS Member Agency provider with a copy of this document. As a condition of participation, each HMIS Member Agency is asked to adhere to all policies within the document as signed in the HMIS Memorandum of Understanding (MOU).

## **EXCEPTIONS**

In order to mitigate risk from participation in the HMIS system, the leadership has the right to grant exemptions to any HMIS policy only in the following instances:

1. Unique circumstances/projects not encountered before by McHenry County Community Development staff,
2. Public policy decisions needing some considerations,
3. In need of quick timelines for implementation. No other instances will be considered.

## **ACKNOWLEDGMENTS**

The Community Development staff of McHenry County would like to thank the HMIS Member Agencies and local community CoC participating agencies for their thoughts, ideas, and work to help draft and revise this document.

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## UNIVERSAL DATA ELEMENTS (UDEs)

- Name
- Name Data Quality
- Social Security Number
- Social Security Number Data Quality
- Date of Birth
- Date of Birth Data Quality
- Race
- Ethnicity
- Gender
- Veteran Status
- Disabling Condition
- Project Start Date
- Project Exit Date
- Destination
- Relationship to Head of Household
- Client Location
- Housing Move-in Date
- Prior Living Situation

## U.S. Department of Housing & Urban Development (HUD) & HMIS Acronyms & Definitions

<b>Administration for Children and Families</b>	<b>ACF</b>	A division of the U.S. Department of Health and Human Services HHS). ACF has a budget for 65 programs that target children, youth and families, including for assistance with welfare, child support enforcement, adoption assistance, foster care, childcare, and child abuse.
<b>Agency Administrator</b>	<b>AA</b>	A person designated by an HMIS Member Agency Executive Director/Chief Executive Officer who acts as a liaison and contact person to the McHenry County Community Development staff.
<b>Alliance of Information &amp; Referral Systems</b>	<b>AIRS</b>	The professional association for more than 1,000 community information and referral (I&R) providers serving primarily the United States and Canada. AIRS maintain the taxonomy of human services.
<b>Annual Performance Report</b>	<b>APR</b>	Report that tracks program progress and accomplishments in HUD’s competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee’s or UFA performance
<b>Audit Trail</b>		A record showing who has accessed a computer system and what operations they have performed during a given period of time. Most database management systems include an audit trail component.

<b>Bed Utilization</b>		An indicator of whether program beds are occupied on a particular night or over a period of time.
<b>Biometrics</b>		This refers to the identification of a person by computerized images of a physical feature, usually a person's fingerprint.
<b>Chronic Homelessness</b>		HUD defines a "chronically homeless" individual as a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the chronically homeless" definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period

		separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.
<b>Client</b>		A living individual about whom a service provider collects or maintains protected personal information because (1) the individual is receiving, has received, may receive, or has inquired about assistance from a CHO; or (2) in order to identify needs, or to plan or develop appropriate assistance within the CoC.
<b>Client Intake</b>		The process of collecting client information upon entrance into a program.
<b>Community Development Block Grant</b>	<b>CDBG</b>	A flexible program that provides communities with resources to address a wide range of unique community development needs. Beginning in 1974, the CDBG program is one of the longest continuously run programs at HUD. The CDBG program provides annual grants on a formula basis to over 1,100 general units of Local and State governments.
<b>Consumer</b>		An individual or family who has or is currently is experiencing homelessness.
<b>Continuum of Care</b>	<b>CoC</b>	Also called CoC or Continuum, means the group organized to carry out the responsibilities required under the CoC Program Interim Rule (24 CFR Part 578) and is comprised of representatives of organizations, including but not limited to: nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, and law enforcement, and organizations that serve homeless and formerly homeless persons to the extent that these groups are represented within the geographic area and are available to participate.
<b>Continuum Program</b>		Also called "Program" refers to the federal funding source which provides housing and/or service grant dollars.
<b>Coordinated Entry</b>	<b>CE</b>	Coordinated Entry and Homeless Management Information Systems (HMIS) Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred and connected to housing and assistance based on their strengths and needs.
<b>Coverage</b>		A term commonly used by CoCs or homeless providers to refer to the number of beds represented in an HMIS divided by the total number of beds available.
<b>Covered Homeless Organization</b>	<b>CHO</b>	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses, or processes data on homeless clients for and, the requirements of the HMIS Final Notice apply to all Covered Homeless Organizations.
<b>Data Quality</b>		The accuracy and completeness of all information collected and reported to the HMIS Data Standards.
<b>Date of Birth</b>	<b>DOB</b>	The date a person was born.
<b>De-identification</b>		The process of removing or altering data in a client record that could be used to identify the person. This technique allows research, training, or other non-clinical applications to use real data without violating client privacy.
<b>Department of Education</b>	<b>DOE</b>	The agency of the federal government that establishes policy for administrators and coordinates most federal assistance to education. It assists the president in executing their education policies for the nation and in implementing laws enacted by Congress. This agency of the federal government that establishes policy for administrators and coordinates most federal assistance to education. It assists the president in executing their education policies for the nation and in implementing laws enacted by Congress.
<b>Digital Certificates</b>		An attachment to an electronic message used for security purposes. The most common use of a digital certificate is to verify that the user sending a message they claim to be and to provide the receiver with the means to encode a reply. They claim to be and to provide the receiver with the means to encode a reply.
<b>Disabling Condition</b>		A disabling condition in reference to chronic homelessness is defined by HUD as a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.

<b>Domestic Violence</b>	<b>DV</b>	Occurs when a family member, partner or ex-partner attempt to physically or psychologically dominate another. Includes physical violence, sexual abuse, emotional abuse, intimidation, economic deprivation, and threats of violence. Violence can be criminal and includes physical assault (hitting, pushing, shoving, etc.), sexual abuse (unwanted or forced sexual activity), and stalking. Although emotional, psychological and financial abuses are not criminal behaviors, they are forms of abuse and can lead to criminal violence. There are a number of dimensions of DV. Mode physical, psychological, sexual and/or social; frequency on/off, occasional, chronic; and severity in terms of both psychological or physical harm and the need for treatment, including transitory or permanent injury, mild, moderate, and severe up to homicide.
<b>Electronic Housing Inventory Chart</b>	<b>eHIC</b>	Point-in-time inventory of provider programs within a Continuum of Care that provides beds and units dedicated to serve persons who are homeless, categorized by six Program Types: Emergency Shelter; Transitional Housing; Rapid Re-Housing; Affordable Housing; Homeless Prevention; and Permanent Supportive Housing.
<b>Electronic Special Needs Assistance Program</b>	<b>e*SNAPs</b>	Established by HUD as the electronic Continuum of Care program and grants management system used to support the CoC program funding application and grant awards process.
<b>Emergency Food and Shelter Program</b>	<b>EFSP</b>	A federal program administered by the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) and has been entrusted through the McKinney-Vento Homeless Assistance to supplement and expand ongoing efforts to provide shelter, food, and supportive services for hungry and homeless people across the nation.
<b>Emergency Shelter</b>	<b>ES</b>	Any facility whose primary purpose is to provide temporary shelter for the homeless in general or for specific populations of the homeless.
<b>Emergency Solutions Grants</b>	<b>ESG</b>	A federal grant program designed to help improve the quality of existing emergency shelters for the homeless, to make available additional shelters, to meet the costs of operating shelters, to provide essential social services to homeless individuals, and to prevent and end homelessness.
<b>End-User</b>	<b>EU</b>	Any individual who uses or enters data in an HMIS or a comparable database approved by the CoC. This can include Agency Administrators.
<b>Encryption</b>		Conversion of plain text into unreadable data by scrambling it using a code that masks the meaning of the data to any unauthorized viewer. Computers encrypt data by using algorithms or formulas. Encrypted data are not readable unless they are converted back into plain text via decryption.
<b>Ethnicity</b>		Identity with or membership in a particular racial, national, or cultural group and observance of that group's customs, beliefs, and language.
<b>Family and Youth Services Bureau</b>	<b>FYSB</b>	Provides national leadership on youth and family issues. Promotes positive outcomes for children, youth, and families by supporting a wide range of comprehensive services and collaborations at the local, Tribal, State, and national levels.
<b>Federal Emergency Management Agency</b>	<b>FEMA</b>	The agency responsible for coordinated response for disaster that has occurred in the United States and that overwhelms the resources of local and state authorities.
<b>Federal Information Processing Standards</b>	<b>FIPS</b>	Ensure that all federal government and agencies adhere to the same guidelines regarding security and communication.

<b>Geographic Information Systems</b>	<b>GIS</b>	An information system for capturing, storing, analyzing, managing, sharing, and displaying geographically referenced information.
<b>Government Performance and Results Act</b>	<b>GPR</b>	One of a series of laws designed to improve government project management. The GPR requires agencies to engage in project management tasks such as setting goals, measuring results, and reporting their progress. In order to comply with GPR, agencies produce strategic plans, performance plans, and conduct gap analysis of projects.

<b>Hashing</b>		The process of producing hashed values for accessing data or for security. A hashed value is a number or series of numbers generated from input data. The hash is generated by a formula in such a way that it is extremely unlikely that some other text will produce the same hash value or that data can be converted back to the original text. Hashing is often used to check whether two texts are identical. For the purposes of Homeless Management Information Systems, it can be used to compare whether client records contain the same information without identifying the clients.
<b>Health Insurance Portability and Accountability Act of 1996</b>	<b>HIPAA</b>	U.S. law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals, and other health care providers. Developed by the Department of Health and Human Services, these standards provide patients access to their medical records and give them more control over how their personal health information is used and disclosed.
<b>HMIS Data and Technical Standards Final Notice</b>		Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS. The HMIS Final Notice contains rules about who needs to participate in HMIS, what data to collect, and how to protect client information.
<b>HMIS Lead Organization</b>	<b>HMIS Lead</b>	The central organization that will house those individuals who will be directly involved in implementing and providing operational, training, technical assistance, and technical support to participating agencies.
<b>HMIS System Administrator</b>	<b>Admin</b>	The individual(s) whose job it is to manage the HMIS implementation at the local level: enrolling programs and managing appropriate use supporting users through connection to or direct provision of user training, and overseeing system setup.
<b>Homeless Management Information System</b>	<b>HMIS</b>	Computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of individuals experiencing homelessness.
<b>Homelessness Prevention and Rapid Re-Housing Program</b>	<b>HRP</b>	The Homelessness Prevention and Rapid Re-Housing Program is a legacy program that provided financial assistance and services to prevent individuals and families from becoming homeless and help those who are experiencing homelessness to be quickly rehoused and stabilized. This program was the precursor to the Rapid Re-Housing programs.
<b>Housing Opportunities for Persons with AIDS</b>	<b>HOPWA</b>	Established by HUD to address the specific needs of persons living with HIV/AIDS and their families. HOPWA makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons medically diagnosed with HIV/AIDS and their families. Only the city of Chicago and the state of Illinois are the grant recipients for HOPWA.
<b>HOPWA Consolidated Annual Performance and Evaluation Report</b>	<b>CAPER</b>	The CAPER report for HOPWA formula grantees provides annual information on program accomplishments that supports program evaluation and the ability to measure program beneficiary outcomes as related to maintain housing stability; prevent homelessness, and improve access to care and support.
<b>Inferred Consent</b>		Once clients receive an oral explanation of HMIS, consent is assumed for data entry into HMIS. The client must be a person of age and in possession of all his/her faculties (for example, not mentally ill).
<b>Information and Referral</b>	<b>I&amp;R</b>	A process for obtaining information about programs and services available and linking individuals to these services. These services can include emergency food pantries, rental assistance, public health clinics, childcare resources, support groups, legal aid, and a variety of nonprofit and governmental agencies. An HMIS usually includes features to facilitate information and referral.
<b>Informed Consent</b>		A client is informed of options of participating in an HMIS system and then specifically asked to consent. The individual needs to be of age and in possession of all of their faculties (for example, not mentally ill), and



		their judgment not impaired at the time of consenting (by sleep, illness, intoxication, alcohol, drugs or other health problems, -etc.).
<b>McKinney-Vento Act</b>		The McKinney-Vento Homeless Assistance Act was signed into law by the President on July 22, 1987. The McKinney Vento Act funds numerous programs providing a range of services to homeless people, including the Continuum of Care programs: the Supportive Housing Program, the Shelter Plus Care Program, and the Single Room Occupancy Program, as well as the Emergency Shelter Grant Program.
<b>Memorandum of Understanding</b>	<b>MOU</b>	A bilateral or multilateral agreement between two or more parties.
<b>Member Agency</b>		An agency that has signed all HMIS agreements and who is actively entering data into the system.
<b>Mental Health</b>	<b>MH</b>	State of emotional and psychological well-being in which an individual is able to use their cognitive and emotional capabilities, function in society, and meet the ordinary demands of everyday life.
<b>Notice of Funding Availability</b>	<b>NOFA</b>	An announcement of funding available for a particular program or activity.
<b>Performance Measures</b>		A process that systematically evaluates whether a program's efforts are making an impact on the clients being served.
<b>Performance Assessment Rating Tool</b>	<b>PART</b>	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. The PART, therefore, looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Because the PART includes a consistent series of analytical questions, it allows programs to show improvements over time and allows comparisons between similar programs.
<b>Permanent Supportive Housing</b>	<b>PSH</b>	Long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables the special needs populations to live independently as possible in a permanent setting.
<b>Personal Protected Information</b>	<b>PPI</b>	Information that can be used to uniquely identify, contact or locate a single person, or may enable disclosure of personal information.
<b>Point in Time</b>	<b>PIT</b>	A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count of unsheltered homeless population every other year in the last ten days of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds. In alternating years, the CoC is only required to count all clients in emergency and transitional beds.
<b>Privacy Notice</b>		A written, public statement of an agency's privacy practices. A notice informs clients of how personal information is used and disclosed. According to the HMIS Data and Technical Standards, all covered homeless organizations must have a privacy notice.
<b>Program Data Element</b>	<b>PDE</b>	Data elements required for programs that receive funding under the McKinney-Vento Homeless Assistance Act and complete the Annual Performance Reports (APRs).
<b>Prospective Member Agency</b>		An agency who has inquired about joining HMIS.
<b>Race</b>		Identification within five racial categories: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Clients may be reported as having two or more races.
<b>Release of Information</b>	<b>ROI</b>	In the United States, HIPAA and State guidelines strongly direct the rules and regulations of patient information. ROI's identify what forms of patient consent, medical records, and information can be released.
<b>SAGE HMIS Reporting Repository</b>	<b>SAGE</b>	Effective April 1, 2017, all APRs are submitted in Sage HMIS Reporting Repository. It replaced e-Snaps for submission of APRs. The "Archived e-Snaps Resources for submitting APRs in Sage" are available on the HUD Website.
<b>Scan Cards</b>		Some communities use ID cards with bar codes to reduce intake time by Electronically scanning ID cards to register clients in a bed for a night. These ID cards are commonly referred to as scan cards.

<b>Shelter Plus Care (McKinney-Vento Program)</b>	<b>S+C</b>	A legacy program that provides grants for rental assistance for homeless persons with disabilities through four component programs: Tenant, Sponsor, Project, and Single Room Occupancy (SRO) Rental Assistance.
<b>Single Room Occupancy</b>	<b>SRO</b>	A residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both. It provides rental assistance on behalf of homeless individuals in connection with moderate rehabilitation of SRO dwellings.
<b>Social Security Number</b>	<b>SSN</b>	A 9-digit number issued by the Social Security Administration to individuals who are citizens, permanent residents, and temporary (working) residents.
<b>Supplemental Security Income</b>	<b>SSI</b>	A monthly stipend provided to aged (legally deemed to be 65 or older), blind, or disabled persons based on need, paid by the U.S. Government.
<b>Supportive Housing Program</b>	<b>SHP</b>	A program that provides housing, including housing units and group quarters that has a supportive environment and includes a planned service component. This is also the former name of the CoC program prior to the passage of the HEARTH Act.
<b>Supportive Services</b>		Services that may assist homeless participants in the transition from the streets or shelters into permanent or permanent supportive housing, and that assist persons with living successfully in housing.
<b>Supportive Services Only</b>	<b>SSO</b>	Projects that address the service needs of homeless persons. Projects are classified as this component only if the project sponsor is not also providing housing to the same persons receiving the services. SSO projects may be in a structure or operated independently of a structure, such as street outreach or mobile vans for health care. A Coordinated Entry Project is also categorized as a SSO.
<b>Technical Assistance</b>	<b>TA</b>	Specialized service or skill that a nonprofit does not possess within the organization, but which it may need in order to operate more effectively. Examples of technical assistance include review of policies and procedures; establishment of new projects; and assistance with conforming to regulations.
<b>Technical Submission</b>		The form completed in the second phase of the CoC fund application process in which an applicant that is successful in the competition (called a “conditionally selected grantee” or “subrecipient”) then provides more detailed technical information about the project that is not contained in the original application, as requested by HUD or the grantee.
<b>Temporary Assistance for Needy Families</b>	<b>TANF</b>	Provides cash assistance to indigent American families with dependent children through the United States Department of Health and Human Services.
<b>Transitional Housing</b>	<b>TH</b>	A project that has its purpose in facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Transitional housing may occur through a brick and mortar setting or through a rental assistance / leasing.
<b>Unaccompanied Youth</b>		Minors not in the physical custody of a parent or guardian, including those living in inadequate housing such as shelters, cars, or on the streets. It also includes those who have been denied housing by their families and school-age unwed mothers who have no housing of their own.
<b>Unduplicated Count</b>		The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.

<b>Universal Data Element</b>	<b>UDE</b>	Data required to be collected from all clients serviced by homeless assistance programs using an HMIS. These data elements include date of birth, gender, race, ethnicity, veteran’s status, and Social Security Number (SSN). These elements are needed for CoCs to understand the basic dynamics of homelessness in their community and for HUD to meet the Congressional directive. A complete listing of all UDEs is included as the first page of the document.
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<b>U.S. Department of Health and Human Services</b>	<b>HHS</b>	A Cabinet department of the United States government with the goal of protecting the health of all Americans and providing essential human services.
<b>U.S. Department of Housing and Urban Development</b>	<b>HUD</b>	The Federal agency responsible for national policy and programs that address America's housing needs that improve and develop the Nation's communities, and enforce fair housing laws. HUD's business is helping create a decent home and suitable living environment for all Americans, and it has given America's cities a strong national voice at the Cabinet-level.
<b>Veterans Affairs</b>	<b>VA</b>	The government runs a military veteran benefit system. It is responsible for administering programs of veterans' benefits for veterans, their families, and survivors. The benefits provided include disability compensation, pension, education, home loans, life insurance, vocational rehabilitation, survivors' benefits, medical benefits, and burial benefits.
<b>Violence Against Women Act</b>	<b>VAWA</b>	Programs range from policies to encourage the prosecution of abusers to victim's services to prevention programs. VAWA helped forge new alliances between police officers, courts, and victim advocates.
<b>Vulnerability Testing</b>		The process of probing a computer system with the goal of identifying security vulnerabilities in a network and the extent to which outside parties might exploit them.
<b>Written Consent</b>		Written consent embodies the element of informed consent in a written form. A client completes and signs a document consenting to an understanding of the options and risks of participating or sharing data in an HMIS system. The signed document is then kept on file at the agency.

## U.S. Department of Housing & Urban Development (HUD) & HMIS Reports

<b>Longitudinal systems analysis report</b>	<b>LSA</b>	A critical aspect of the McKinney-Vento Homeless Assistance Act, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community.
<b>Audit Trail</b>		A record showing who has accessed a computer system and what operations they have performed during a given period of time. Most database management systems include an audit trail component.
<b>HMIS Data and Technical Standards Final Notice</b>		Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS, as amended from time to time. The HMIS Final Notice contains rules about who needs to participate in HMIS, what data to collect, and how to protect client information.
<b>Household PULSE</b>	<b>PULSE</b>	The household PULSE survey is designed to deploy quickly and efficiently to measure data for household experiences during disaster and pandemic periods.
<b>Housing Inventory Chart</b>	<b>HIC</b>	Consists of three housing inventory charts for emergency shelter, transitional housing, and permanent supportive housing.
<b>Performance Assessment Rating Tool</b>	<b>PART</b>	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. The PART, therefore, looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Because the PART includes a consistent series of analytical questions, it allows programs to show improvements over time and allows comparisons between similar programs.
<b>Performance Measures</b>		A process that systematically evaluates whether a program's efforts are making an impact on the clients being served.
<b>Point in Time</b>	<b>PIT</b>	A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count of unsheltered homeless population every other year in the last ten days of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds. In alternating years, the CoC is only required to count all clients in emergency and transitional beds.
<b>Technical Submission</b>		The form completed in the second phase of the CoC fund application process in which an applicant that is successful in the competition (called a "conditionally selected grantee" or "subrecipient") then provides more detailed technical information about the project that is not contained in the original application, as requested by HUD or the grantee.

# U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD) & PARTNERS PROJECTS & ACRONYMS

PROGRAMS	ACRONYM	PROJECTS	ACRONYM
HUD-Continuum of Care Program	CoC		
		Electronic Special Needs Assistance Program	e*SNAPs
		Homeless Prevention	HP
		Permanent Supportive Housing	PSH
		Rapid Re-Housing	RRH
		Support Service Only	SSO
		Transitional Housing	TH
		Safe Haven	SH
		20-year Use Requirement	SRO/PSH
		HUD-Emergency Solutions Grants Program	ESG
Emergency Shelter	ES		
Intake/Exit	ES-e/e		
Night-by-Night	ES-NBN		
HUD-Rural Housing Stability Assistance Program	RHSA		
HUD-Housing Opportunities for Persons with AIDS	HOPWA	Hotel/Motel	H/M
		Housing Information	HI
		Permanent Housing	PH

		Permanent Housing Placement	
		Short Term Housing	STH
		Transitional Housing	TH
		Rural Housing Stability Assistance Program	RHSAP
U.S. Department of Health & Human Services	HHS		
		Emergency Shelter	ES
<b>PROGRAMS</b>	<b>ACRONYM</b>	<b>PROJECTS</b>	<b>ACRONYM</b>
Administration for Children & Families	ACYF	Runaway Homeless Youth	RHY
Family & Youth Services Bureau	FYSB	Basic Center Program	BCP
		Emergency Shelter	BCP-es
		Preventative	BCP-p
		Maternal Group	MGH
		Transitional Living Program	TLP
		Demonstration Programs	D
Substance Abuse and Mental Health Services Administration	SAMHSA		
Projects for Assistance in Transition from Homelessness	PATH		
		Street Outreach	SO
		Support Services Only	SSO
U.S. Department of Veterans Affairs			
HUD/VASH	H/V		PSH
		HUD-Veterans Affairs Supportive Housing	VASH

<b>VA-Grant and Per Diem</b>	<b>GPD</b>
<b>VA-Supportive Services for Veteran Families</b>	<b>SSVF</b>
<b>Community Contract Emergency Housing</b>	<b>HCHV/EH</b>
<b>Health Care for Homeless Veterans</b>	<b>HCHV</b>
<b>Community Residential Treatment Program</b>	<b>HCHV/RT</b>
<b>Domiciliary Care</b>	<b>HCHV/DOM</b>
<b>VA Community Contract Safe Haven Program</b>	<b>HCHV/SH</b>
<b>Grant and Per Diem Program</b>	<b>GPD</b>
<b>Compensated Work Therapy Transitional Residence</b>	<b>CWT/TR</b>
<b>Homelessness Prevention</b>	<b>HP</b>
<b>Rapid Re-Housing</b>	<b>RRH</b>

# SECTION 1: HISTORICAL PERSPECTIVE

## U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD) & PARTNERS PROJECTS & ACRONYMS

### INTRODUCTION

The concept of HMIS was a brainchild of the United States Congress and the Department of Housing and Urban Development (HUD). In 1999, Congress mandated the Department of Housing and Urban Development (HUD) find a way to adequately track the scope of homelessness in the United States in the HUD Appropriations Act. The following year, the Department of Housing and Urban Development (HUD) mandated that each community implement or be in the process of implementation of a Homeless Management Information System (HMIS) by October 2004. HMIS is a secure web-based centralized database where non-profit organizations across our community enter, manage, share, and report information about the clients that they serve. It is similar to an electronic health record system in a hospital. The McHenry County Community Development staff provides training and technical assistance to HMIS Member Agency providers and their users.

Senate and House Appropriations Committee reports have reiterated Congress' directive to HUD to:

- Assist communities in implementing local Homeless Management Information Systems (HMIS), and
- Develop a Longitudinal System Analysis (LSA) that is based on HMIS data from a representative sample of communities.

Congress renewed its support for the HMIS initiative and the LSA in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115). In addition to Congressional direction HUD, other federal agencies and the U.S. Inter-agency Council on Homelessness requires HMIS under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual projects authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs and reporting on the outcomes of federal assistance in helping homeless people to become more independent. The major congressional imperatives in HUD's McKinney-Vento Act projects are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of these services in enabling homeless persons to become more self-sufficient;
- Reporting to Congress on the characteristics of homeless persons and effectiveness of federal efforts to address homelessness



## HMIS PROJECT GOALS:

### Measure the Extent and Nature of Homelessness

**The first goal** is to inform public policymakers about the extent and nature of the homeless population in our community. This is accomplished through analysis of homeless client and service provider data. HMIS gathers an unduplicated count of those accessing services, service trends, bed utilization rates, re-entry rates, and HMIS system usage. All data is provided in an aggregated (void of any identifying client-level information) format and made available to public policymakers, service providers, advocates, and consumer representatives

**The second goal** is to streamline the intake and referral process for human service agencies in the community. HMIS provides a standardized mechanism for collecting client information across all providers. Human service providers collect the same client information and then the client can share that information at each project with additional service providers for greater ease of service. As part of the system, a service provider can send an electronic referral to another agency. This streamlined process (Coordinated Entry) allows for the development a centralized coordinated assessment center through which agencies can store assessments, refer clients to other projects, and follow clients longitudinally with a shared information system. Provision for In-depth Case Management by sharing client information can also occur.

**The third goal** is to allow for in-depth case management through the sharing of client information in a centralized system. HMIS provides a standardized mechanism in which human service providers collect information and then share it among every participating human service agency to assist clients more efficiently and effectively.

**Finally, the fourth goal** is to inventory homeless housing options in the community. HMIS captures this inventory and allows for real-time collection and tracking of emergency shelter, transitional housing, and permanent supportive housing.

## SECTION 2: HMIS ROLES & RESPONSIBILITIES

### ROLES:

McHenry County Community Development is to act as the Homeless Management Information System (HMIS) Lead Agency for the community. In addition to acting as the HMIS Lead Agency, the role of HMIS is to provide training and technical support to HMIS Member Agency providers. Lastly, McHenry County Community Development staff coordinates and participates in numerous projects annually regarding data collection and performance measurement.

### RESPONSIBILITIES:

McHenry County Community Development Staff are responsible for coordinating the following items on behalf of HMIS Member Agencies.

All software related issues to the software vendor - This includes all communication with the vendor including phone, email, and conferences. As well as submitting feature enhancement requests from HMIS Member Agencies.

User training - McHenry County Community Development staff is responsible for all End-user training. This is to ensure continuity and consistency with training as well as to ensure the proper workflow for HMIS Member Agencies.

Technical support as it relates to the software or project - McHenry County Community Development staff is responsible for providing technical support to Agency Administrators and End-users. Technical support services attempt to help the user solve specific problems with a product and do not include in-depth training, customization, reporting, or other support services.

Data quality initiatives – Together, Member Agencies and McHenry County Community Development staff work diligently on adhering to data quality standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely.

System-wide reporting on performance measures for local, state and national initiatives - McHenry County Community Development staff train HMIS Member Agencies on how to access and run reports on the data they contribute to the HMIS.

Additionally, reports are provided to the CoC monthly and to statewide and national partners as requested. These data are in an aggregate format and details the trends on how clients are being served in the community.

McHenry County Community Development Staff coordinates and/or participates in numerous projects annually that include, but are not limited to data collection and reporting.

## ANNUAL PROJECTS & REPORTS

### **The Longitudinal Systems Analysis (LSA) Report**

A critical aspect of the McKinney-Vento Homeless Assistance Act, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community.

The Longitudinal Systems Analysis (LSA) report, produced from a CoC's Homelessness Management Information System (HMIS) and submitted annually to HUD via the HDX 2.0, provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use their system of care. This page provides guidance for CoCs about how to use and interpret their LSAs as well as for HMIS software providers about how to program the report. The LSA is typically due annually for submission in January. The HMIS Administrator will review system data quality and reach out to participating agencies with corrections in the November and December leading up to the report submission.

### **Grant Inventory Worksheet (GIW)**

Provide CoCs and Field Offices with information about CoC program grants that are eligible for renewal in the upcoming competition.

### **Housing Inventory Chart (HIC)**

The Housing Inventory Chart (HIC) is an annual report submitted to the Department of Urban Development (HUD) that lists all homeless emergency, transitional, safe haven, shelter plus care, and permanent supportive housing beds in our Continuum of Care (CoC). The HIC is typically due to be submitted to HUD annually in late spring. The HMIS Administrator will confirm bed/unit counts with HMIS shelter projects prior to official submission.

### **Point in Time (PIT)**

A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count of unsheltered homeless population every other year in the last ten days of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds. In alternating years, the CoC is only required to count all clients in emergency and transitional beds. The PIT is typically due to be submitted alongside the HIC to HUD annually in late spring. The HMIS Administrator will confirm census counts for the night of the PIT with HMIS shelter projects prior to official submission.

### **SAGE**

HUD's reporting system for the submission of its Continuum of Care (CoC) Program Annual Performance Report (APR). As of April 1st, 2017, Sage Homeless Management Information System (HMIS) Repository is the portal for all CoC Program recipients / UFA to submit their APR to HUD Annual Performance Report (APR) - The Annual Performance Report (APR) provides annual performance reporting on clients outputs and outcomes that enables an assessment of grantee performance in achieving the housing stability outcome measure. The APR fulfills statutory reporting requirements and provides the grantee and HUD with the necessary information to assess the overall performance and accomplishment of the grantee's program activities under the approved goals and objectives.

## SECTION 3: HMIS MEMBER AGENCY ROLES & RESPONSIBILITIES

HMIS Member Agency is the term given by the McHenry County Community Development staff to reference participating healthcare and/or human service providers who actively enter data into the HMIS.

### **PARTICIPATION REQUIREMENTS POLICY 3.1:**

A qualified HMIS Member Agency is required to sign and abide by the terms of the End User Contract and the HMIS Policies and Procedures (this manual).

### **PROCEDURE:**

Any organization that provides health and human services to the homeless may qualify to participate in HMIS. To participate in HMIS, Member Agencies must sign and agree to abide by the terms of the End User Contract. They must also abide by the policies and procedures outlined in this document as well as the End-user Agreement. All Member Agencies which receive funding from the United States Housing and Urban Development Department (HUD) are mandated to participate in HMIS by contract. For other agencies, participation is voluntary and strongly encouraged by the local CoC.

### **HMIS END USER CONTRACT POLICY 3.2:**

The HMIS End User Contract must be signed by each representative of the HMIS Member Agency that will access HMIS.

### **DOCUMENT:**

The HMIS End User Contract is a legal agreement between the HMIS Member Agency and the HMIS Lead Agency regarding specific HMIS guidelines and use. The agreement outlines specific details about the HMIS Member Agency providers' HMIS involvement including, but not limited to, the areas of confidentiality, data entry, security, data quality, and reporting.

### **PROCEDURE FOR EXECUTION:**

HMIS participating agencies will notify the HMIS Administrator with a request to add a new HMIS end user. The agency may request a blank End User Contract from the HMIS Administrator and must then submit the signed HMIS End User Contract to the administrator. The HMIS Administrator will retain copies of all active and inactive HMIS end users. Before accessing HMIS, the new end user must read the HMIS Policies and Procedures manual and attend an introductory training with the HMIS Administrator (or Agency Admin, if approved).

### **AGENCY STAFF ROLES AND REQUIREMENTS POLICY 3.3:**

Each Member Agency will assign an Agency Administrator to coordinate HMIS activities for their organization. Procedure: The Executive Director (or authorized officer) of the Agency will notify the HMIS Administrator which individuals that will be assigned to this role. This role is vital to the success of HMIS at the HMIS Member Agency locations. This practice will ensure that the data is entered in a timely manner, the quality of the data is continuously monitored, and communication and support between Community Development and the HMIS Member Agency is streamlined. An Agency Administrator is the staff member at an HMIS Member Agency provider who acts as the centralized contact for the McHenry County Community Development staff.

### **AGENCY ADMINISTRATOR ROLE AND RESPONSIBILITY:**

The Agency Administrator role is to act as the operating manager and liaison for the HMIS system at the HMIS Member Agency. This position is required for any Member Agency using HMIS. They are responsible for the following items:

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Adhere to and enforce the HMIS Policies and Procedures. Attend the annual Agency Administrator Training. Login to the system at least once every 30 days. Communicate and authorize personnel and security changes for HMIS End-users to McHenry County Community Development staff within 24 hours of a change. Act as the first tier of support for HMIS End-users. Ensure client privacy, security, and confidentiality for clients. Enforce HMIS End-user Agreements. Ensure the HMIS Privacy Notice is posted in a visible area of the Agency and communicated in a language understandable by clients. Enforce data collection, entry, and quality standards. Ensure a basic competency with running HMIS system reports and have an understanding of system-wide data quality reports. Ensure Agency and all users are using the correct HMIS related forms and following the most current HMIS procedures and workflow. Attend all HMIS required meetings and conference calls. Assist with HMIS projects as needed (LSA, PIT, HIC, and CAPER) Schedule/Authorize HMIS End-user Training. Inform McHenry County Community Development staff of all project changes within at least five business days prior to the change.

### **POLICY 3.5:**

For Member Agencies with less than five licensed end-users, an Agency Administrator is not required, but at least one HMIS Point of Contact is recommended, but not required, to communicate with the McHenry County Community Development staff.

### **PROCEDURES:**

The Point of Contact role is very similar to the Agency Administrator role but without the technical support aspect. The McHenry County Community Development staff will fulfill the role of help desk support and triage. A Member Agency should designate a primary and a back-up Point of Contact. The HMIS Point of Contact is responsible for the following items: Adhere to and enforce the HMIS Policies and Procedures. Enforce HMIS User Agreements. Ensure client privacy, security, and confidentiality. Communicate and authorize personnel/security changes for HMIS End-users to McHenry County Community Development staff within 24 hours of a change. Authorize HMIS End-users by completing the HMIS End-user Request Form prior to training. Ensure Agency and all users are using the correct HMIS related forms and following the most current HMIS workflow. Inform McHenry County Community Development staff of all project changes with at least five business days prior to the change. Ensure the HMIS Privacy Notice is posted in a visible area of the Agency and communicated in a language understandable by clients. Attend all HMIS required meetings and conference calls assist with HMIS projects as needed (LSA, PIT, HIC, CAPER, and PULSE)

### **POLICY 3.6:**

HMIS Member Agency will ensure that at least one person will complete training in order to receive a license to access live client data in HMIS.

### **PROCEDURE:**

Once the Agency Administrator/Point of Contact position has been assigned, they will be able to work with McHenry County Community Development staff to assign End-users and authorize additional licenses for the HMIS Member Agency. The End-user will complete training and then be responsible for the timeliness of the data being entered and the quality of the data they enter. Integrity and accuracy. Licenses are transferrable and the fee is an annual fee. An End-user is a term used to refer to all HMIS users at an HMIS Member Agency. Every HMIS End-user must attend at least one training session and sign an HMIS End-user Agreement. This should be completed within five business days of training. Every HMIS End-user is responsible for the following items: Adhering to all of the Policies and Procedures outlined in this document. Attending all training required by McHenry County Community Development staff and the HMIS Member Agency Administrator. Entering quality data in a timely and accurate manner. Adhere to the data requirements set by the McHenry County Community Development staff and the HMIS Member Agency.

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## **INITIAL HMIS STAFF SITE VISIT POLICY 3.7: McHenry County Community Development**

Prior to signing the HMIS agreements, a prospective HMIS Member Agency will first schedule and complete an on-site, or virtual, Initial HMIS Site Visit at the prospective Member Agency.

### **PROCEDURE:**

Prior to signing the Agreements for participation, a prospective HMIS Member Agency provider may first schedule and complete an on-site Initial HMIS site visit at the prospective Member Agency. This site visit is between the McHenry County Community Development staff, the prospective HMIS Member Agency Executive Director and other HMIS Member Agency critical staff at the prospective HMIS Member Agency location. Other staff may include data entry staff, supervisors, managers, intake workers, or case managers. The prospective HMIS Member Agency should include any staff they feel necessary to perform HMIS data entry, data quality or the reporting process. At this site visit, McHenry County Community Development staff will document the goals of the prospective HMIS Member Agency in regards to

HMIS (what do they want to achieve by using the system), go over the required data elements, review the Policy and Procedures, define entry requirements and set expectations. The site visit also allows McHenry County Community Development staff to properly assess the prospective HMIS Member Agency providers' workflow and user needs, specific implementation issues, and any constraints or risks that will need to be mitigated by the prospective HMIS Member Agency prior to going live. A site demo using a training version of the HMIS system may also be used (at McHenry County Community Development staff discretion) during the visit to visually explain HMIS and its capabilities.

## **MINIMAL TECHNICAL REQUIREMENTS POLICY 3.8**

All HMIS End-user workstations must meet minimum technical requirements in order for HMIS to be functional and to meet the required security specifications.

### **PROCEDURE:**

The following details are the minimal set of technical requirements for hardware and internet connectivity to the HMIS system. HMIS works with Google Chrome (latest version), and EDGE (latest version). Hardware: Laptop, Tablet or Workstation with Internet Connectivity: (High-Speed Internet) either wireless or connected through an Ethernet network (LAN). System requirements for the hardware is Windows 8, and Windows 10 (prefer the latest operating system for best results).

## **POINT OF CONTACT ROLE & RESPONSIBILITY**

### **MINIMAL TECHNICAL REQUIREMENTS POLICY 3.9:**

All HMIS End-user workstations must meet minimum technical requirements for HMIS to be functional and to meet the required security specifications.

### **PROCEDURE:**

The following details are the minimal set of technical requirements for hardware and internet connectivity to the HMIS system. HMIS works with Google Chrome (latest version), and EDGE (latest version). Hardware: Laptop, Tablet or Workstation with Internet Connectivity: (High-Speed Internet) either wireless or connected through an Ethernet network (LAN). System requirements for the hardware is Windows 8, and Windows 10 (prefer the latest operating system for best results).

### **LAPTOP/WORKSTATION MAINTENANCE:**

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Browsers should refresh on a regular basis to allow for proper speed and functionality. Your device can be set to perform this function automatically in your browser setting after each session is closed. Laptops/Workstations should maintain sufficient virus protection. Regular system maintenance and updates should be applied. Google Chrome is the suggested browser.

### **HMIS DATA USAGE POLICY 3.10:**

HMIS Member Agency providers will not violate the terms of use of data within the HMIS system.

### **PROCEDURE:**

HMIS Member Agency providers will not breach system confidentiality by misusing HMIS data. HMIS data is not to be used for any purpose outside the use of case management, project evaluation, education, statistical and research purposes.

### **POLICY 3.11:**

HMIS Member Agency providers shall not use any data within HMIS to solicit clients, organizations, or vendors for any reason.

### **PROCEDURE:**

At no time shall confidentiality of clients, organizations, and vendors be violated by disclosing client information to non-members. Data in HMIS will not be used to solicit for volunteers, employees, or clients of any type. This information must not be sold, donated, given, or removed from HMIS for any purpose that would violate client, organization, or vendor confidentiality or put participants at harm or risk. Those found in violation of this rule will have their access to HMIS immediately terminated and the violation disclosed to all local government and funding entities.

### **POLICY 3.12:**

HMIS Member Agency providers shall not sell any HMIS client, organization, or vendor data for any reason.

### **PROCEDURE:**

At no time shall the confidentiality of clients, organizations, and vendors be violated by selling any information. HMIS Member Agency providers shall not profit from disclosure of client, organization, or vendor information. Disclosure of information puts everyone at legal risk. Violation or breaches in HIPAA and 42 CFR regulations can result in fines and jail time. Those found in violation of this rule will have their access to HMIS immediately terminated and the violation disclosed to all local government and funding entities.

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### HMIS END-USERS ROLES AND RESPONSIBILITY

An End-user is a term used to refer to all HMIS users at an HMIS Member Agency. Every HMIS End-user must attend at least one training session and sign an HMIS End-user Agreement. This should be completed within five business days of training. Every HMIS End-user is responsible for the following items: Adhering to all of the Policies and Procedures outlined in this document. Attending all training required by McHenry County Community Development staff and the HMIS Member Agency Administrator. Entering quality data in a timely and accurate manner. Adhere to the data requirements set by the McHenry County Community Development staff and the HMIS Member Agency.

#### HMIS DATA USAGE POLICY 3.13:

HMIS Member Agency providers will not violate the terms of use of data within the HMIS system.

#### PROCEDURE:

HMIS Member Agency providers will not breach system confidentiality by misusing HMIS data. HMIS data is not to be used for any purpose outside the use of case management, project evaluation, education, statistical and research purposes.

#### POLICY 3.14:

HMIS Member Agency providers shall not use any data within HMIS to solicit clients, organizations, or vendors for any reason.

#### PROCEDURE:

At no time shall confidentiality of clients, organizations, and vendors be violated by disclosing client information to non-members. Data in HMIS will not be used to solicit for volunteers, employees, or clients of any type. This information must not be sold, donated, given, or removed from HMIS for any purpose that would violate client, organization, or vendor confidentiality or put participants at harm or risk. Those found in violation of this rule will have their access to HMIS immediately terminated and the violation disclosed to all local government and funding entities.

### HMIS DATA USAGE

#### POLICY 3.15:

HMIS Member Agency providers shall not sell any HMIS client, organization, or vendor data for any reason.

#### PROCEDURE:

At no time shall confidentiality of clients, organizations, and vendors be violated by selling any information. HMIS Member Agency providers shall not profit from disclosure of client, organization, or vendor information. Disclosure of information puts everyone at legal risk. Violation or breaches in HIPAA and 42 CFR regulations can result in fines and jail time. Those found in violation of this rule will have their access to HMIS immediately terminated and the violation disclosed to all local government and funding entities. HMIS Corrective Action.

#### POLICY 3.16:

If an HMIS Member Agency or any of its End-users have violated any HMIS policy, the McHenry County Community Development staff will implement an action plan upon discovery of the violation.

#### PROCEDURE:

Violations in HMIS policy may occur. HMIS Member Agencies will work to ensure violations in policy are prohibited. If a violation is discovered, it is the role of the McHenry County Community Development staff to swiftly respond in order



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to prevent further violations from occurring or the current violation from harming clients or other HMIS Member Agencies. The McHenry County Community Development staff will determine a course of action depending on the type and the severity of the policy violation.

**CRITICAL RISK** (For example: Security Breach, Imminent risk to clients, Unresolved Data Quality Errors)

HMIS System Administrator will suspend all HMIS Member Agency Active End-user Licenses. Affected End-users will be suspended until retraining.

- HMIS Lead Agency immediately reports the violation to the CoC leadership.
- Lead Agency will work with CoC leadership to formulate a response to HMIS agency.
- HMIS Lead Agency will contact the HMIS Member Agency in question to discuss the violation and course of action.
- HMIS Member Agency will be suspended until the violation is resolved and will be placed on probation for at least 60 days.
- HMIS Lead Agency will contact the HMIS Member Agency Executive Director to discuss violation and action plan.

**MEDIUM RISK** (For example: Grievance has been filed against HMIS Member Agency or general complaints that threaten or endanger clients.)

- HMIS Lead Agency immediately contacts and reports to the CoC Leadership to discuss the course of action and plan.
- HMIS Lead Agency will contact the HMIS Member Agency in question to discuss the violation and course of action.
- The HMIS Lead Agency will contact the HMIS Member Agency Executive Director to discuss violation and action plan.
- HMIS Member Agency will be placed on Probation for at least 30 days and possible suspension until violation resolved. If appropriate, HMIS System Administrator will suspend affected HMIS Member Agency's Active End-user Licenses.

**LOW RISK** (For example: Unresponsive HMIS Member Agency to HMIS Requests, Ceased Data Entry, Incorrect Bed List, End-user Inactivity, and Timeliness Issues.)

- HMIS Lead Agency contacts and reports to the HMIS Member Agency to discuss the course of action and plan.
- HMIS Member Agency with HMIS Lead Agency will discuss the violation and course of action. • Lead Agency and HMIS Member Agency will develop "Work Out Plan"
- Violations may be reported to CoC through project evaluation.

### **PROCEDURES:**

If appropriate, the HMIS Lead Agency will contact the HMIS Member Agency Executive Director to discuss violation and action plan. If appropriate, HMIS Member Agency will be placed on probation for at least 30 days or until violation resolved. If appropriate, HMIS System Administrator will suspend all or some of the HMIS Member Agency End-user Licenses in question.

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### POTENTIAL COURSES OF ACTION

#### **PROBATION:**

The HMIS Project Coordinator will notify the Agency's Executive Director and HMIS Agency Administrator in writing to set up a one-on-one meeting to discuss the violation in question. During the meeting, an action plan will be developed and documented with relevant time frames outlined set to correct actions. If a training issue is identified, the HMIS Project Coordinator will coordinate further follow up with the End-users in question. The Member Agency will be on placed on probation, for a minimum of 90 days, where monitoring and auditing may be required and performed regularly during this period. Notification of probation will be communicated to all local contract managers.

#### **SUSPENSION:**

If a violation is of critical risk or the corrective measure(s) are not achieved in the probationary period, or more HMIS violations occur during the probationary period, the HMIS System Administrator will suspend access to HMIS until the issues are resolved. The HMIS Member Agency will receive a written notice to the Member Agency's Executive Director of the suspension, reasons, and effective date. During suspension, a mandatory meeting will be held between the Member Agency Executive Director, the CoC Leadership, and the McHenry County Community Development staff, if appropriate, to discuss suspension and requirements for resolution. All meeting deliverables will be documented in writing and must be achieved within the set probationary period.

#### **TERMINATION:**

If the Member Agency violates any policies deemed of critical risk and fails to achieve resolution within the probation period, the McHenry County Community Development staff will permanently terminate the Member Agency from HMIS. The HMIS Member Agency will receive a written notice to the Member Agency Executive Director outlining the termination, reasons, and effective date. Notification of the termination will be sent to all local contract managers. In the case of incurred data quality costs and/or transfer costs, the Member Agency will assume responsibility for payment.

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### SECTION 4: USER ADMINISTRATION

#### **HMIS END-USER PREREQUISITES POLICY 4.1:**

All HMIS Users are required to have a minimum set of basic computer competency and skills to adequately perform their data entry roles in HMIS.

#### **PROCEDURE:**

Each HMIS Member Agency Administrator should meet the skill requirements set forth in the Agency Administrator Minimum Qualifications. All other HMIS Users should be prepared with basic computer competency/skills to adequately be able to use and navigate HMIS.

#### **HMIS END-USER AGREEMENT POLICY 4.2:**

No prospective HMIS User will be given a license for HMIS if she or he has entered a plea of nolo contendere (no contest) or been found guilty of any fraud (including identity theft) or stalking related felony crimes punishable by imprisonment of one year or more in any state.

#### **PROCEDURE:**

An HMIS Member Agency should not risk the privacy and confidentiality of client information by allowing any individual convicted of a fraud or stalking related crime (fraud, identity theft, stalking) in any state. In the broadest sense, a fraud is an intentional deception made for personal gain or to damage another individual. An HMIS User needs to be mindful of potential identity theft and improper usage and disclosure of client information.

An HMIS User will be denied HMIS access if they meet any of the following, whether a judgment of guilt was withheld or not: has entered a plea of nolo contendere (no contest) to a fraud-related felony crime (fraud, identity theft, stalking) punishable by imprisonment of one year or more. Has entered a plea of guilty to a fraud-related felony crime (fraud, identity theft, stalking) punishable by imprisonment of one year or more for crimes concerning. Has been convicted or found guilty of a fraud-related felony crime (fraud, identity theft, stalking) punishable by imprisonment of one year or more for crimes.

#### **POLICY 4.3:**

Any prospective HMIS User who was a previous client of the same project they now intend to work or volunteer must not have resided at the facility or been a project participant in the last 6 months prior to gaining access to HMIS.

#### **PROCEDURE:**

The HMIS User for most residential/homeless service projects must not have been a previous client of the same project he/she now intends in which work or volunteer for the last 6 months prior to gaining access to HMIS. An HMIS User should never have access to detailed information on project/service participants that may have received services at the same time as the end-user. Any HMIS Member Agency who violates this rule is putting client information at risk of a privacy and confidentiality breach. Upon discovery of the practice, HMIS Lead staff will immediately inactivate the HMIS User in question and notify the agency administrator and end-user of the inactivation in writing.

#### **POLICY 4.4:**

All HMIS Users must be provided with a software license and provided training through the McHenry County Community Development staff prior to entering or accessing client data in HMIS.

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### **PROCEDURE:**

Due to the amount of personally identifying information and the confidential nature of the HMIS, every HMIS user or software provider must be assigned a software license to access the system and their initial training must come from the HMIS Lead staff. To receive a license, a potential HMIS User must not violate HMIS policies 4.0 through 4.3. A condition of being granted a license is that all users must sign and adhere to an HMIS User Agreement. This document outlines the role and responsibility of having and maintaining their access to HMIS. An HMIS User who violates the HMIS User Agreement will be immediately inactivated from HMIS.

### **POLICY 4.5:**

Notification of issuance and revocation of access within the HMIS is the responsibility of the Agency Administrator.

### **PROCEDURE:**

Agency Administrators are responsible for notifying the HMIS Lead staff of a new user, change in user access or deletion of user access within 24 business hours of their organization's needed change to HMIS access. Agency Administrators should work with the HMIS Lead staff to ensure proper license access is given qualified HMIS Users. However, issuance, maintenance, and revocation of software licenses within the HMIS Lead is the sole responsibility of HMIS Lead staff.

### **ASSIGNMENT OF END-USER SECURITY SETTINGS.**

The HMIS Lead staff will assign the security level of every end-user based on the agreed-upon security settings established by the Member Agency at the Initial HMIS site visit. The Agency Administrator or Executive Director will grant access to individuals based on their role in the organization and needed access to HMIS. Assignments are best organized by the lowest level of security the staff or volunteer member would need to perform their normal work duties as defined by their official job/position description. If the HMIS User is to remain on the system but has had a change in responsibilities, an Agency Administrator or Executive Director may request a change in any end-users security setting.

### **ADDITIONAL LICENSES/CHARGES:**

Signed by the appropriate HMIS User. Licenses are allocated on a first-come-first-served basis based upon agency size, use, and adherence to all Policies and Procedures set forth in this document. If there are no more licenses available, the user will have to wait until a license is available or the HMIS Member Agency may purchase a license for the HMIS User.

### **HMIS LEAD STAFF REMOVING A USER LICENSE FOR CAUSE:**

HMIS Lead reserves the right to inactivate or delete the license for any end-user for cause. In all cases where a licensee is removed for cause, the assigned HMIS Member Agency Administrator and Executive Director will be notified immediately via email with the stated cause of license removal. Reasons that a licensee would lose their license or otherwise have their license temporarily inactivated or revoked would include, but not be limited to: A consistent lack of good data quality. Sharing system credentials (login and password) with any other party. Allowing non-authorized users to view any data from, have access to, see the screens of, or be provided any print outs of client data from HMIS.

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### **OTHER VIOLATIONS OF THESE HMIS POLICIES:**

Other serious infractions that result in a compromise of the HMIS Member Agency and/or any client-level data in the system. Agency removing a user license. An HMIS User license can only be deactivated by the HMIS Lead staff. Requests for removal or other change of a license by an HMIS Member Agency can only come from the Agency Administrator or Executive Director. The request must be submitted in writing via email or Help Desk. All license requests should be communicated to HMIS within 24 business hours after the end-user has left the employment of the HMIS Member Agency, the HMIS User has changed positions and is no longer in need of HMIS access, or has knowingly breached or is suspected of a system breach where client data has been compromised. Terminations should be submitted using the HMIS License Request Form.

### **LAW ENFORCEMENT POLICY 4.6:**

No active member of law enforcement or detention and corrections staff will be an authorized HMIS User.

### **PROCEDURE:**

To protect current clients who may be accessing health and human service projects from harassment or harm, active members of law enforcement will not be granted access to HMIS. Limited exceptions may be negotiated, and an agreement executed with HMIS, the local COC, when there is a project with direct involvement in an active homeless jail diversion and/or prison release project. Any agreement with exceptions must include a statement that: HMIS use is (1) is limited to the purpose for which it was intended, and (2) is only for work with project involved clients.

Former members of law enforcement who may volunteer or are employed at a homeless service provider post-law enforcement career may have access to HMIS if it is imperative to their new responsibilities. HMIS will consider and respond to requests by law enforcement with next of kin searches, searches for clients and in the interest of public safety a person(s) who law enforcement has probable cause or an active warrant for his/her arrest related, to a violent crime and other felony crimes. HMIS will provide law enforcement information related to evidence and information gathering concerning a criminal matter via Court Order, such as a search warrant or subpoena.

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## SECTION 5: Clients' Rights/Client Consent

### **CONSENT POLICY 5. 1:**

An HMIS Member Agency must obtain consent from all clients for whom they are entering or accessing client data into HMIS. However, if your CoC operates under a closed system, a member agency must attain a signed consent from the client for data collection for each specific project. The client owns their personal data and the CoC/HMIS acts as a custodian of that data.

### **PROCEDURE:**

No client's data will be shared in HMIS without their consent. The HMIS Member Agency agrees to get written permission on one or both of the following forms signed by the client: Informed Consent and or a Release of Information. All consent forms are not system-wide but specific to the project/service they are receiving. Informed Consent. The HMIS Client Informed Consent form provided is required to be used to record a client's authorization for their data to be entered into HMIS. The original signed Client Informed Consent form should be kept by the HMIS Member Agency and protected from theft or loss. This form explains to clients their rights and authorizes the data to be entered into HMIS. HMIS End-users should strive to communicate the contents on the form in a language the client understands.

### **HMIS Release of Information (ROI)**

The HMIS Release of Information (ROI) form is used to control how client data is shared in HMIS. It should be kept by HMIS Member Agency and protected from loss or theft. Member Agencies are required to use the HMIS Release of Information form provided or another version approved by the HMIS Administrator.

Release of information is specific to sharing data among providers in the Continuum of Care, as well as HMIS Member Agencies. Clients have the right to have their records open, partially open or closed. HMIS Users should strive to communicate a Release of Information in a language the client understands. The form must be completed by each member of the household receiving services who is over the age of 18 and those who did not sign the Informed Consent. The head of the household may sign for any children or members of the household under the age of 18 on the same form. Informed Consent, but still wants to control how their data is shared, they will need to sign another HMIS Release of Information form and the data will need to be updated in HMIS. Agencies must make reasonable accommodations for persons with disabilities throughout the data collection process. This may include, but is not limited to, providing qualified sign language interpreters, readers, or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. Agencies that are recipients of federal assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the project.

### **CLIENT ACCESS TO INFORMATION POLICY**

#### **5. 2:**

All clients entered into HMIS have a right to view information within their electronic HMIS file.

### **PROCEDURE:**

If an HMIS Member Agency has a written policy for providing copies of their paperwork or data collection to clients, the HMIS Member Agency may follow its procedures to allow for providing copies of the HMIS data they collected.

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### FILING A GRIEVANCE

#### **POLICY 5.3:**

Clients have the right to file a grievance with the McHenry County Community Development staff about any HMIS Member Agency related to violations of access in HMIS, violations of HMIS Policies and Procedures, or violations of any law.

#### **PROCEDURE:**

McHenry County Community Development staff will entertain any client who wishes to file grievance against any HMIS Member Agency. McHenry County Community Development staff will request that a client fill out an HMIS Client Grievance Form, which can be obtained by contacting the McHenry County Community Development staff by phone, email, or regular mail. Once completed and submitted by the client, McHenry County Community Development staff will investigate the complaint and provide its findings to the client who lodged the grievance. HMIS will notify the parties involved about the alleged incident reported. If the client is not satisfied with the findings of the grievance, the client must submit a grievance request in writing to the U.S. Dept. of Housing and Urban Development.

#### **POLICY 5.4:**

Other HMIS Member Agencies have a right to file a grievance with the McHenry County Community Development staff about any HMIS Member Agency related to violations of access in HMIS, violations of HMIS Policies and Procedures, or violations of any law.

#### **PROCEDURE:**

McHenry County Community Development staff will entertain any HMIS Member Agency who wishes to file grievance against any other HMIS Member Agency. In cases where a client leaves one HMIS Member Agency to receive services from another HMIS Member Agency and the client reports a suspected violation, the new HMIS Member Agency does have a right to file a grievance or duty to warn the McHenry County Community Development staff on behalf of the client as long as the client grants their permission to file a grievance on their behalf. McHenry County Community Development staff will request an HMIS Client Grievance Form be completed by either the client or the HMIS Member Agency. The form can be obtained by contacting the McHenry County Community Development staff by phone, email or regular mail. Once completed and submitted by the client, McHenry County Community Development staff will investigate the complaint and provide its findings to the client who lodged the grievance. McHenry County Community Development staff will notify the parties involved and the appropriate community planners about the alleged incident reported. If the client is not satisfied with the findings of the grievance, the client must submit a grievance request in writing to the U.S. Department of Housing and Urban Development.

### **REVOKING AUTHORIZATION FOR HMIS DATA COLLECTION**

#### **POLICY 5.5:**

All clients who initially agree to participate in HMIS have the right to rescind their permission for data sharing in HMIS.

#### **PROCEDURE:**

Clients who choose to revoke their information-sharing authorization must complete a new Release of Information. Once closed, the HMIS Member Agency will no longer be able to share future client data entered into HMIS. However, data entered prior to the record being closed can still be viewed and shared with other Member Agency providers. The new Release of Information should be kept on file by the Member Agency. After a Release of Information is signed and

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a client is accepted into an HMIS participating financial assistance project, the client must sign a client consent form and McHenry County Community Development staff must be notified to re-open the client record for sharing. The notification to re-open the file must be submitted in writing, along with a scanned copy of the client's newly signed consent.

## SECTION 6: PRIVACY, SAFETY & SECURITY

### **NATIONAL PRIVACY REQUIREMENTS POLICY**

#### **6.1:**

HMIS complies with all federal, state, local laws, standards, and regulations.

#### **PROCEDURE:**

It is imperative that partner agencies have Policies and Procedures in place that ensure compliance with applicable laws and regulations that govern their projects.

#### **HMIS-USER ACTIVITIES:**

HMIS-users are required to operate in accordance with HMIS/HMIS privacy and security rules, as well as any applicable federal, state, local laws and regulations. More information about HMIS Privacy and Security Rules may be found at [https://www.hudexchange.info/resources/documents/HEARTH\\_HMISRequirementsProposedRule.pdf](https://www.hudexchange.info/resources/documents/HEARTH_HMISRequirementsProposedRule.pdf)

#### **POLICY 6.2:**

HMIS Member Agency providers must post an HMIS Privacy Notice prominently on their websites and in areas of plain view of the public such as waiting rooms, intake areas, lobbies, or screening or assessment areas. HMIS Member Agency providers are required to provide a copy of the HMIS Privacy Notice to all clients upon request by the client.

#### **PROCEDURE:**

By law, HMIS Member Agency providers are required to post a Privacy Notice that discloses the collection and use of Client Information. HMIS has developed a document for posting for providers without adequate notice. The HMIS Privacy Policy and Notice are document in Appendix V. System Security and Privacy Statement

#### **POLICY 6.3:**

System Security and Privacy Statement

The HMIS Lead Agency has implemented extensive technical and procedural measures to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data as recommended in the HMIS Data and Technical Standards.

#### **PROCEDURE:**

The security and confidentiality of homeless and at-risk client information within HMIS is a major issue. For certain providers and subpopulations, such as Domestic Violence Shelters, Substance Abuse Facilities and HIPAA Covered Entities, security, and confidentiality of client information becomes even a much larger concern for all involved. The HMIS Data and Technical Standards, published June 30, 2004, and updated through 2014 by the U.S. Department of Housing and Urban Development (HUD), include extensive HMIS Privacy and Security Standards to be followed by Continuum of Services, Homeless Assistance Providers, and HMIS Software companies. These standards were



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developed after careful review of the Health Insurance Portability and Accountability Act (HIPAA) standards for securing and protecting patient information. The HMIS has and will continue to be in compliance with these privacy and Security Standards even while not being considered a HIPAA covered entity as an HMIS Lead Agency.

### **POLICY 6.4:**

HMIS secures the location of the server in a controlled hosting environment providing security from data loss and theft.

### **PROCEDURE:**

HMIS contracts with a HUD-approved software vendor to provide HMIS to the Continuum of Services. As a web-based HMIS solution, the HMIS software and databases are hosted on secure servers in a highly secure computer room accessible only by very few employees who are responsible for maintaining and supporting the system. The vendor computers are also protected by firewalls to prevent unauthorized external access.

### **POLICY 6.5:**

HMIS ensures that only appropriate staff and volunteers at HMIS Member Agency providers gain and retain system access through a user authentication process.

### **PROCEDURE:**

As an Internet-based software system, each HMIS User accesses the system via their internet web browser thru Two Factor Authentication (2FA) is an extra layer of security used to make sure that people trying to gain access to an online account are who they say they are. First, a user will enter their username and a password. Then, instead of immediately gaining access, they will be required to provide another piece of information to access HMIS, each user must know the web address (URL) for HMIS, which is not available or published outside the community on the website, each user must use a valid user sign-on and dynamic password. All user names and initial temporary passwords are issued by McHenry County Community Development staff only. After three failed login attempts, user ID's and passwords automatically become inactive and users must contact an Agency Administrator or McHenry County Community Development staff for reactivation. Passwords are always encrypted and can never be seen in clear text.

### **POLICY 6.6:**

HMIS secures data as it is traveling over the Internet and stored on the centralized server by proving encryption for all data.

### **PROCEDURE:**

As a cloud or web-based software system, it is imperative that all data travel through the Internet encrypted or unreadable to an outside user. All HMIS transactions are fully encrypted using Secure Socket Layer (SSL) with 128-bit encryption. This is the highest commercially available encryption level and is the same as used by financial institutions. Users can be assured that the data they are interacting with is secure by noticing the URL, or Web Address while using HMIS begins with the letters HTTPS (HyperText Transfer Protocol Secure).

### **POLICY 6.7:**

McHenry County Community Development staff, in conjunction with the HMIS Member Agency Administrator, ensures that all HMIS Users have access to the components of the system appropriate for their level of data usage.

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## **PROCEDURE:**

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The HMIS software has a built-in security system that ensures each user only has the minimum access needed to perform their normal duties. Each HMIS user is assigned a security level in their user profile that grants them access to only the areas they need to accurately do their work. A change to the level of system security for an end-user may only be requested by an Agency Administrator or Executive Director for which the end-user works.

## **POLICY 6.8:**

McHenry County Community Development staff use audit trail tools to ensure system maintenance, investigate privacy, security breaches or filed client grievances.

## **PROCEDURE:**

The HMIS software has built-in audit trail applications that allow administrators to audit the use and access of data. Audit reporting is an integral part of maintaining system security protocols and is performed on a scheduled basis by McHenry County Community Development staff.

## **POLICY 6.9:**

The HMIS is a shared information system with default visibility and security exceptions preset by McHenry County Community Development staff based on the workflow of the Member Agency.

## **PROCEDURE:**

Pursuant to 42 and 45 CFR notwithstanding, HMIS is an open or shared HMIS system. The default visibility settings for clients will be set to OPEN for all HMIS clients that are not registered or receiving services from any 42 or 45 CFR facility or project. If a client is enrolled in a 42 or 45 CFR covered entity project, project visibility settings will be set in accordance with applicable laws.

The HMIS system utilizes a set of Visibility Settings that allow the sharing of only agreed-upon data elements among the participating HMIS Member Agencies. The HMIS system utilizes a set of Deny Exceptions that disallow sharing of certain information by provider projects based upon federal, state, or local laws and guidelines, and by agreement with each HMIS Member Agency provider. System Visibility settings may only be changed by the McHenry County Community Development staff. Requests to change visibility settings must be made via e-mail request to McHenry County Community Development staff. The HMIS system is constructed to offer a dynamic range of levels of security based on the needs of the agency and HMIS User. As a default, HMIS Users will only have enough security access to perform their normal job duties. Requests to change a user status must come from an HMIS Member Agency Administrator. A client has the right to refuse to have his or her data entered into the HMIS database. The client's individual choice regarding participation will not affect his or her right to services.

## **DATA OWNERSHIP POLICY 6.10:**

All data is governed by the owner(s) of the data with regard to data use and disclosure.

## **PROCEDURE:**

The client ultimately retains ownership of any identifiable client-level information that is stored within HMIS. If the client consents to share data, the client, or agency on behalf of the client, has the right to later revoke permission to share her or his data without affecting rights to service provision. System maintenance, investigate privacy, security breaches or filed client grievances.

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## SECTION 7: USER TRAINING

### **POLICY 7.1:**

All HMIS Users are required to have a basic computer competency prior to attending any HMIS training.

### **PROCEDURE:**

All users must have internet access and a company email address (personal if the agency agrees). Email must be able to be accessed over the internet.

### **POLICY 7.2:**

HMIS Lead Agency is currently using WellSky. After training, please submit the appropriate user agreement.

### **PROCEDURE:**

If the user is having issues getting the system up and running, call us for help.

### **ONSITE TRAINING:**

McHenry County Community Development staff is available to deliver onsite training in the event that an agency has a large number of staff to train or wants a specific topic covered.

### **POLICY 7.3:**

HMIS Lead Agency has established periodic training site through our database provider, WellSky.

### **PROCEDURE:**

New End-users will be given a link to our HMIS database provider WellSky. This link must be requested by the HMIS Member Agency.

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### SECTION 8: HMIS TECHNICAL SUPPORT

#### **POLICY 8.1:**

The McHenry County Community Development staff has provided a system that will allow HMIS Users to request technical assistance regarding the database.

#### **POLICY 8.2:**

The McHenry County Community Development staff will respond to all inquiries from Member Agencies and clients in a timely manner.

#### **PROCEDURE:**

Response times for technical assistance varies based on the item that is submitted and the priority associated. McHenry County Community Development staff reserve the right to adjust priority levels based on the type of the request.

#### **POLICY 8.4:**

McHenry County Community Development staff will submit to the vendor all feature enhancement requests submitted through the proper channels from Agency Administrator(s) or HMIS Users.

#### **PROCEDURE:**

It is a stated goal of HMIS to be as efficient and user-friendly as possible within the technical restraints of the system. Feature enhancement requests are welcomed and encouraged. Please submit all possible feature enhancements via Email. Screenshots or other supportive documents should be attached.

If enhancement is for new system functionality, please describe a workflow and diagram as much as possible. If appropriate, please denote how much time savings would be achieved if the feature enhancement were to be enacted. If appropriate, please denote all of the possible benefits for your agency or End-users and other Member Agency providers if feature enhancement were to be enacted.

#### **POLICY 8.5:**

McHenry County Community Development staff have provided the HMIS website for its HMIS Users. Links to HMIS information, resources and forms are located at the following address: <https://www.mchenrycountyhomeless.org/>

#### **PROCEDURE:**

Please feel free to visit the site for the latest data entry changes.

#### **POLICY 8.6:**

The Homeless Management Information System staff will hold mandatory periodic in-person meetings or conference calls to discuss system changes and provide technical support.

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## SECTION 9: DATA COLLECTION PROCESS

### **CLIENTS SERVED VS. CLIENTS BENEFITING FROM SERVICE**

#### **POLICY 9.1:**

All client data entered into HMIS by the Member Agency should be that of clients and/or the household that is receiving service.

#### **PROCEDURE:**

Clients entered into HMIS should consist of the clients in attendance at the day of enrollment into the project or services, and can consist of minors under the age of 18 if the legal guardian consents to their entry into HMIS. HMIS is not meant for adult clients who are not in attendance or may benefit from services at a later date (prospective clients). HMIS Member Agency providers should refrain from entering adult clients into HMIS that are not physically seen to be enrolled in the project providing the service because they cannot give “consent in absentia.” For those providing financial assistance services per address, it is expected each member of the household receiving the service by the same address must provide consent and be entered as a household unit in HMIS and linked together using a service transaction, otherwise, there is a risk of duplication of services. Data on all members of the family should be entered individually but tied together as a household. The head of household can give consent for all minor children (under 18 years of age) in a family but cannot give consent for any adult members (over the age of 18). All adults must give their consent individually.

### **DATA ENTRY REQUIREMENTS**

#### **POLICY 9.2:**

The Homeless Management Information System staff requires each HMIS Member Agency to enter client-level data based on a set of predefined data standards.

#### **PROCEDURE:**

HMIS data standards are based on the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards. Every project entering into HMIS must adhere to the requirements set by HUD and the local Continuum of Care. Every project entering data into HMIS is evaluated based on the following elements: completeness, consistency, accuracy, and timeliness. Refer to Section 10 on Data Quality for details.

Providers are required to enter the following Universal Data Elements as outlined on page one of this document.

Minimum data entry standards. The elements required for every person who is entered in the system are: Release of Information documented, Name (First, Last) Data Quality, Social Security Number (partial or full) Data Quality, Date of Birth Data Quality, Race, Ethnicity, Gender, Veteran Status, Disabling Condition, Project Start Date, Project Exit Date, Destination, Relationship to Head of Household, Client Location, Housing Move-in Date, Prior Living Situation.

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### PROCEDURE FOR MCKINNEY-VENTO FUNDED PROJECTS

HMIS Member Agencies who are funded through any of the programs below must meet the basic requirements set by HMIS and also meet additional Program Specific Data Elements (PSDE). Found at HUDHRE.com and <https://www.hudexchange.info>:

- Emergency Solutions Grant (ESG)
- Supportive Services for Veteran Families (SSVF)
- VA Grant and Per Diem Program (GPD)
- Rapid Re-Housing Program (RRP)
- Projects in Assistance of Transition from Homelessness (PATH)
- Supportive Housing Program (SHP)
- Shelter Plus Care (S+C)
- Section 8 Moderate Rehabilitation for Single Room Occupancy (SRO)
- Housing Opportunities for Persons with AIDS (HOPWA)

Additional program-specific data elements to be collected are detailed in HUD Data Standards and vary by program type (e. g. PATH, SSVF, RHY, ESG, etc.) and may include:

- Housing Status
- Income amount
- Income Source(s)
- Income Date(s)
- Non- Cash Benefits Source(s)
- Non-Cash Benefits Date(s) and Sources,
- Health Insurance
- Non-Cash Benefits
- Health Insurance

Source(s):

- Health Insurance Information Date
- Reason for No Health Insurance (if applicable)
- Disability Type
- Domestic Violence Victim/Survivor Information Date
- Contact Date (Street Outreach Only)
- Date of Engagement (Street Outreach and Services Only Projects)
- Services Provided (PATH, HOPWA, & VA Funded)
- Referrals Provided
- Residential Move-in Date
- Domestic Violence
- Housing Assessment Disposition
- Housing Assessment at Exit.

The housing status must be recorded at Project Start. The client’s income and sources must be recorded at Project Start and verified at least one time during a year if in the project over a year. It is recommended that Member Agencies and Agency Administrators review the most current Data Dictionary posted on the HUD Exchange.

### **POLICY 9. 3:**

For the annual Housing Inventory Count, (HIC), all Housing Providers are required to maintain the most current bed inventory in HMIS.

### **PROCEDURE:**

All Housing Providers must work with McHenry County Community Development staff to build accurate bed lists in HMIS. Each HMIS bed list should be assigned to the appropriate project (Emergency, Transitional, Permanent Supportive, etc.).

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## **POLICY 9.4:**

All Member Agency homeless providers are encouraged to record all Program-Specific Data Elements (PSDE) for all clients entered into HMIS even if not required for funding.

## **PROCEDURE:**

Optional PSDE is a valuable area of the client record and part case management. Therefore, though not required, HMIS Users are encouraged to complete these elements for each client, especially if the client is in a housing or financial assistance project. The optional PSDE include Employment, Adult Education, General Health Status, Pregnancy Status, Veteran's Information, and Children's Education.

## **HMIS CLIENT PHOTO ID CARDS**

### **POLICY 9.6:**

Member Agency providers have the option to create and disseminate HMIS Client Photo ID Card for all clients being entered into HMIS.

### **PROCEDURE:**

Some Continuum of Care have established the HMIS Client Photo ID Cards as the identification for all homeless clients in the system. Homeless and at-risk homeless clients will be issued an HMIS Client Photo ID Card at their first point of entry into the Continuum of Care. The cards may be issued at major continuum points of access such as day centers and one-stop centers or by other Member Agency providers when a service is rendered.

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### SECTION 10: DATA QUALITY

Data quality is vitally important to the success of the Homeless Management Information System. HMIS Member Agency providers and McHenry County Community Development staff will work diligently on adhering to the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely. Adherence to set data quality standards will help bring additional funded dollars into our community as well as ensure our data reflects our community level of service when reported locally, statewide, or nationally. Data quality will be evaluated on accuracy, completeness, consistency, and timeliness. This data will be used by the Continuum of Care to monitor progress towards meeting its benchmarks.

**POLICY 10.1:**

The Homeless Management Information System staff will evaluate the quality of all HMIS Member Agency data on the accuracy of the data entered monthly.

**PROCEDURE:**

Accuracy is the degree to which data correctly reflects the client's situation or episode as self-reported by the client.

**POLICY 10.1.1:**

All client data entered into HMIS should reflect what the client self-reported or an accurate assessment of known information by a case manager.

**PROCEDURE:**

Data captured for entry into HMIS should be what was client self-reported or data known by case managers. HUD Procedures allow case managers to make changes to client data not reported by the client. Client self-reported means any information reported to staff by the client.

**POLICY 10.1.2:**

All client data entered into HMIS should be congruent with program details.

**PROCEDURE:**

Client records entered into HMIS should reflect the client population served, match capacity of enrollment, project type, and project intake/exit should fall within service parameters. This information is based on the consistency of accurate data entered on clients receiving services.

**PROCEDURE:**

The HMIS software includes a series of reports to aid in outcome evaluation, data quality monitoring, and analysis of system trends.

**POLICY 10.6.3:**

The McHenry County Community Development staff may provide specialty reports to all HMIS Member Agency providers for a fee.



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**PROCEDURE:**

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Assistance from the McHenry County Community Development staff to customize reports may be a fee-based service. A request must be submitted to the McHenry County Community Development staff for evaluation and fee determination.

## SECTION 11: PERFORMANCE MEASUREMENT

The McHenry County Community Development staff will measure the performance of HMIS Member Agency providers as it relates to the quality of the data entered into the system. Additionally, performance on a system-level will be measured to show the progress towards our Continuum of Care in ending homelessness. Please refer to the McHenry County Data Quality Management Plan for details on HMIS performance measurement.

**POLICY 11.1:**

The McHenry County Community Development staff will measure the timeliness and completeness of data entered by each HMIS Member Agency.

**PROCEDURE:**

As a quality monitoring tool, the McHenry County Community Development staff will measure the effectiveness of data entry performed by each HMIS Member Agency. These reports will be generated out of the system on a monthly basis. Each HMIS Member Agency will have 5 business days to seek technical assistance regarding and/or correct any data quality issues.

**POLICY 11.2:**

The McHenry County Community Development staff will measure the bed utilization rates of homeless housing providers.

**PROCEDURE:**

As a quality monitoring tool, the McHenry County Community Development staff will review the bed utilization rates of HMIS Member Agencies on a quarterly basis (January, April, July, and October).

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## HMIS STATEMENT OF CONFIDENTIALITY AND USER REQUEST

Please complete the following:

Employee Name: \_\_\_\_\_

(Print)

Agency Name: \_\_\_\_\_

Employee E-Mail Address: \_\_\_\_\_

(Print Clearly)

**Important – Please note**

New Users and Existing Users must complete this form annually.

### SERVICE AGREEMENT

\_\_\_\_\_ (“Agency”) agrees to provide resources to persons referred to this service provider for the purpose of facilitating the necessary established goals and outcomes for the individual within the Agency and on the Service Point Information System (HMIS).

### STATEMENT OF CONFIDENTIALITY

*I AGREE TO MAINTAIN THE STRICT CONFIDENTIALITY OF INFORMATION OBTAINED*

*THROUGH THE CoC Homeless Information Management Tracking System. This information will be used only for the legitimate client services and administration of the above named agency. Any breach of confidentiality will result in immediate termination of participation in the HMIS.*

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Authorized Personnel Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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### REQUEST FOR ACCOUNT

Each user requires a unique username and password (to be kept private). Use of another user's username (account) is grounds for immediate termination from the CoC.

User ID : \_\_\_\_\_

Access Level: \_\_\_\_\_

#### USER'S RESPONSIBILITY STATEMENT

*Your username and password give you access to the CoC network system. Initial each item below to indicate your understanding of the proper use of your username and password, and sign where indicated. Any failure to uphold the confidentiality standards set forth below is grounds for immediate termination from the HMIS.*

#### Initial Only

\_\_\_\_\_ I understand that my username and password are for my use only.

\_\_\_\_\_ I understand that I must take all reasonable means to keep my password physically secure.

\_ I understand that the only individuals who can view HMIS Tracking information are authorized users and the clients to whom the information pertains.

\_\_\_\_\_ I understand that I may only view, obtain disclose, or use the database information that is necessary in performing my job.

\_\_\_\_\_ I understand those hard copies of HMIS Tracking information must be kept in a secure file.

\_\_\_\_\_ I understand that these rules apply to all users of the HMIS Tracking Systems whatever their work role of position.

\_ I understand that once the hard copies of HMIS Tracking information are no longer needed, they must be properly destroyed to maintain Confidentiality.

\_ I understand that if I notice or suspect a security breach, I must immediately notify CoC.

I understand and agree to the above statements.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## HMIS Governance Charter

### **DESIGNATIONS:**

McHenry County Community Development operates the Homeless Management Information System (HMIS) to record and store client level information with regard to numbers, characteristics, and needs of persons who use shelter, housing and supportive services who are experiencing homelessness within McHenry County.

HMIS is used to aggregate data about the extent and nature of homelessness over time; produce an unduplicated count of homeless persons; understand patterns of service use, and assist the CoC to measure the effectiveness of homeless assistance projects and programs.

Data produced is used for planning, education, and submission to HUD.

### **McHenry County Continuum of Care Responsibilities**

The CoC is responsible for:

- Designating a single information system as the official HMIS software for McHenry County.
- Designating an HMIS Lead to administer the HMIS.
- Providing for governance of the HMIS Lead, including:
  - The requirement that the HMIS Lead enter into written HMIS Memorandum of Agreements with each Partnering HMIS Agency (PHA) requiring the PHA to comply with federal regulations regarding HMIS and imposing sanctions for failure to comply; and
  - The participation fee, if any, charged by the HMIS Lead.
- Maintaining documentation evidencing compliance with this part and with the governance charter.
- Reviewing, revising and approving the policies and plans required by federal regulation.

### **DESIGNATIONS:**

- The CoC designates the software operated by WellSky and known commonly as ServicePoint as the official HMIS for McHenry County.
- The CoC designates McHenry County Community Development as the HMIS Lead to administer HMIS.

### **RESPONSIBILITIES OF THE HMIS LEAD:**

The HMIS Lead is responsible for:

- Ensuring the operation of and consistent participation by recipients of Continuum of Care (CoC) and Emergency Solutions Grants (ESG) Program funds, along with Federal Partner programs including PATH, and VA SSVF Partnering HMIS Agencies, including oversight of the HMIS and any necessary corrective action to ensure that the HMIS is in compliance with federal requirements.
- Develop written HMIS policies and procedures in accordance with §24 CFR 580.31.
- Execute a written HMIS Memorandum of Agreement with each PHA, which includes the obligations and authority of the HMIS. Lead and PHA, the requirements of the security plan and privacy policy with which the

# HMIS Policies and Procedures Manual

PHA must abide, sanctions for violating the HMIS Participation Agreement and an agreement that the HMIS Lead and the PHA will protect identifying information consistent with the agreement.

- Serving as the applicant to the US Department of Housing and Urban Development (HUD) for CoC grant funds to be used for HMIS activities, as directed by the CoC, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities.
- Monitoring and enforcing compliance by all PHAs with HUD requirements and reporting on compliance to the MC CoC and HUD.
- Monitoring data quality and taking necessary actions to maintain input of high-quality data from all PHAs.

## **HMIS GOVERNANCE CHARTER:**

- The HMIS lead agency must submit a security plan, an updated data quality plan, and a privacy policy to the CoC for approval within six (6) months after the effective date of the HUD final rule establishing the requirements of these plans, and within six (6) months after the date that any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the MCCoC and PHA.

## **DUTIES OF THE HMIS LEAD:**

- HMIS Policies and Procedures
- McHenry County Continuum of Care must adopt written policies and procedures for the operation of the HMIS that apply to McHenry County Community Development as HMIS Lead, and the Continuum of Care. These policies and procedures must comply with all applicable federal law and regulations, and applicable state or local governmental requirements. The CoC may not establish local standards that contradicts, undermines or interferes with the implementation of the HMIS standards as prescribed in this part. • Unduplicated Count
- The HMIS Lead must, at least once annually, or upon request from HUD, submit to the CoC an unduplicated count of clients served and an analysis of unduplicated counts, when requested by HUD.

## **REPORTING:**

- The HMIS Lead must submit reports to HUD as required.

## HMIS GOVERNANCE CHARTER

- Implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

### HMIS STANDARDS:

- The HMIS Lead Agency, in contracting an HMIS vendor, must require the HMIS vendor and the software to comply with HMIS standards issued by HUD as part of its contract.

### RESPONSIBILITIES OF THE HMIS Lead

- Recipients and sub-recipients consistently participate in HMIS;
- HMIS data is satisfying the requirements of all regulations and notices issued by HUD; and
- Fulfill the obligations outlined in its HMIS Governance Charter and Agreement with the CoC
- Oversee and monitor HMIS data collection and production of the following reports:
  - Sheltered point-in-time count;
  - Unsheltered point-in-time count;
  - Housing Inventory Chart (HIC); • Annual
  - Annual Performance Reports (APRs).

# HMIS Policies and Procedures Manual

## DISASTER RECOVERY

### **PROCEDURE:**

The McHenry County Continuum of Care Homeless Management Information System (IL 500- HMIS) is a critically important tool used to gather and maintain information about the homeless population in the state. This document describes the responsibilities of key personnel and three scenarios where HMIS recovery may be required:

- Local disaster in Illinois
- Outage or disaster at ServicePoint location

### **ON-SITE POWER OUTAGE OR SERVICE INTERRUPTION**

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

- The IL 500-HMIS data is backed up nightly to an off-site, secure server bank. In the event of a disaster, this data can be immediately available via an Internet connection.
- CAFTH/MIS Tech support will still be available during normal business hours

### **LOCAL DISASTER PLAN**

A local disaster is considered to be a disaster that affects locations in or around McHenry County. In the event of a local disaster: IL 500-HMIS, in collaboration with the local Agencies, will provide information to local responders (fire, police, etc.) as required by law and within best practice guidelines

- IL 500-HMIS in collaboration with the local Agencies will also provide access to organizations charged with crisis response within the privacy guidelines of the HMIS system and as allowed by law.

### **STAFF EMERGENCY RESPONSIBILITIES**

During a disaster, communication between the HMIS Lead Agency staff, the CoCs, the Agencies, and the Wellsky will be a shared responsibility that is based on location and type of disaster. Appendix A- Emergency Contacts lists key contact people and their phone numbers.

### **IN THE EVENT OF AN OUTAGE OR SYSTEM FAILURE, STAFF RESPONSIBILITIES INCLUDE:**

- The IL 500-HMIS Project Manager or designee will notify all participating CoCs and local Agency Administrators should a disaster or major outage occur at Wellsky or in the IL 500-HMIS Administrative Offices.
  - When possible, the IL 500-HMIS Project Manager or designee will also provide a description of the recovery plan timeline.
  - After business hours, IL 500-McHenry County Community Development staff will report system failures to the software Vendor using their after regular business hours hotline.
  - IL 500-McHenry County Community Development staff will send an email to local Agency Administrators and McHenry County Community Development staff no later than one hour following identification of the failure.
-

## HMIS DISASTER RECOVERY PLAN

- IL 500-HMIS Project Manager or designated staff will notify the HMIS Vendor if additional database services are required.
- If an outage or failure happens at Wellsky, the Wellsky support staff will manage communication to the System Administrator as progress is made to address the service outage.

### IN ORDER TO THAT HMIS DATA CAN BE RESTORED IN THE EVENT OF A DISASTER, HMIS LEAD AGENCIES ARE REQUIRED TO:

- Back-up internal management data systems nightly.
- Provide a solution for off-site storage for internal data systems.
- Perform automated backups Monday through Friday to a local network access storage (NAS) device.
- Emergency contact information, including the names and phone numbers of local responders and key internal organization staff, designated representative of the CoCs, local HMIS Lead Agency, and the IL 500-HMIS Project Manager. See Appendix A Emergency Contacts for a list of contacts at the end of this document.
- The HMIS team is responsible for communicating the nature of the emergency and the timeline of IL 500-HMIS being available.

### OUTAGE OR DISASTER AT BITFOCUS LOCATIONS SOFTWARE RECOVERY SERVICES

- HMIS data is entered into Wellsky application. In the event that there is a service outage or disaster at Wellsky location, it is important that Wellsky and all data is backed up and recovered as soon as possible so that personnel in Tennessee can do their work.
- In addition, IL 500-HMIS has a contract with Wellsky that covers the following recovery and preventative options:

### STANDARD SYSTEM FAILURE RECOVERY

- The IL 500-HMIS database is stored online, and is readily accessible approximately 24x7
- Data Backups
- All servers, network devices, and related hardware are maintained by Wellsky. All client data is backed up online and stored on a central file server repository for 24 hours.

### SYSTEM CRASH RESTORE

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

### MAJOR OUTAGES

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

### CANCELLATION:

This policy supersedes all previous instruction

### HUD'S DATA AND TECHNICAL STANDARDS.

#### ACCESS AND CORRECTION

- Each agency must allow individuals to inspect and have a copy of their personal information that is maintained in HMIS.
-



# HMIS Policies & Procedures Manual

## McHenry County Community Development

- Each agency must offer to explain any information that is not understood.
- Individuals must submit a request to inspect their HMIS data in writing to their social worker/case manager. Each agency must consider a written request for the correction of inaccurate or incomplete personal information. If the agency agrees that the information is inaccurate or incomplete, the agency may delete it or may choose to mark it as inaccurate or incomplete and to supplement it with additional information.

### **Each agency may deny the individual's request for inspection or copying of personal information if:**

- Information was compiled in reasonable anticipation of litigation or comparable proceedings.
- Information is about another client/consumer.
- Information was obtained under a promise of confidentiality and the disclosure would reveal the source of the information, or
- Disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
- If the agency denies a request for access or correction, it must explain the reason for the denial and include documentation of the request and the reason for the denial.
- Each agency may reject repeated or harassing requests for access or correction.

### **PURPOSE AND USE LIMITATIONS**

Each agency will use or disclose personal information for activities described in this part of the notice. The agency assumes that clients consent to the use or disclosure of personal information for the purposes described here and for other uses and disclosures that are determined to be compatible with these uses or disclosures

- or provide or coordinate services to individuals (shelter, housing, case management, etc.)
- or functions related to payment or reimbursement for services.
- to carry out administrative functions such as personnel oversight, management functions, and auditing purposes.
- to create de-identified (anonymous) information that can be used for research and statistical purposes
- when required by law
- to avert a serious threat to health or safety if:
- the agency believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
- the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat
- to report victims of abuse when authorized by law.
- for research purposes unless restricted by other federal and state laws.
- to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct).
- for judicial and administrative proceedings in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena.
- to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

Before any use or disclosure of personal information that is not described here, the agency must seek the client's consent first.

## **CONFIDENTIALITY**

Each agency must maintain any/all personal information as required by federal, state, or local laws.

Each agency shall only solicit or input into HMIS client information that is essential to providing services to the client.

- Each agency shall not knowingly enter false or misleading data under any circumstance, nor use HMIS with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.
- Each agency shall ensure that all staff, volunteers and other persons who use HMIS are issued an individual User ID and password.
- Each agency shall ensure that all staff, volunteers, and other persons issued a User ID and password for HMIS receive confidentiality training, HMIS training, and comply with the attached HMIS User Agreement and the HMIS Participation Agreement.

## **PROTECTIONS FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULTS, AND STALKING**

Victim service providers are prohibited from entering data into HMIS. Other agencies must be particularly aware of the need for confidentiality regarding information about persons who are victims of domestic violence, dating violence, sexual assault, and stalking. Additional protections for these clients include explicit training for staff handling personal identifying information of the potentially dangerous circumstances that may be created by improper release of this information.

This plan describes the standards for the security of all data contained in the McHenry County Continuum of Care Homeless Management Information System (MCCOC-HMIS). This plan outlines the security measures currently implemented by the HMIS Lead Agency, the Community Alliance for the Homeless (CAFTH) and details the baseline security requirements for all HMIS Partnering Agencies.

## **USER AUTHENTICATION**

Upon successful completion of training and subject to approval by HMIS Lead, each HMIS user will be provided with a unique personal User Identification Code (User ID) and initial password to access the HMIS.

While the User ID provided will not change, HUD standards require that the initial password only be valid for the user's first access to the HMIS. Upon access with the initial password, the user will see a screen that will prompt the user to change the initial password to a personal password created by the user.

Only the user will know the personal password he or she creates. It is the user's responsibility to remember the password.

- The password created by the user must meet the following Federal and application-enforced guidelines:
- The password must be at least eight characters long.
- The first character of the password must be a letter.
- The password must contain at least one number.
- The password must contain at least one symbol or punctuation character.
- Providers are responsible for communicating all staff departures to the HMIS Lead in a timely manner to ensure user ID for departed staff are inactive
- The user is not permitted to share this password with anyone

## **Application Security**

HMIS Partnering Agencies must maintain anti-virus software on all PCs on their network. PCs that access the Internet must be configured to automatically download updated virus definitions. Steps should also be taken to prevent the intrusion of "adware" and "spyware" programs.

Agency maintains hardware, software, and PPI in a secure environment, protected by a Firewall.

## **PUBLIC ACCESS**

End-users connect to the HMIS through the public Internet verification process provided by our database provide

# HMIS Policies & Procedures Manual

McHenry County Community Development

## **PHYSICAL ACCESS TO HMIS DATA**

HMIS Partnering Agencies must staff computers at all times that are stationed in public areas and used to collect and HMIS data. Every computer that is used to access the HMIS must have a password-protected screen saver that automatically turns on when the computer is temporarily not in use. If an HMIS user will be away from the computer for an extended period of time, he or she is required to log off from HMIS before leaving the work area in which the computer is located.

## Introduction

The McHenry County Continuum of Care (CoC), the Homeless Management Information System (HMIS) Lead, and providers have created this Data Quality Management Plan (DQMP) to provide actionable, measurable steps to address data quality within the HMIS. Data quality within HMIS affects everything we do in our work to address and end homelessness, and its importance cannot be overstated.

While focusing on data quality for federally funded projects that enter data into HMIS is necessary to ensure accurate reporting for those grants, any project that enters data into HMIS contributes to the overall picture of homelessness within the CoC and, therefore, is expected to participate in this DQMP.

The reasons why data quality is important are many, including but not limited to:

- Requirements based on funding the CoC receives;
- Data quality, or lack thereof, can directly affect the funding opportunities for providers;
- Accurate reporting for federal, state, and local funding;
- The ability of the CoC, and providers within the CoC, to tell the story of homelessness as realistically and completely as possible; and
- The data entered into HMIS directly affects clients through the coordinated entry process and may determine which services they may or may not be eligible for.

The CoC will work in conjunction with the HMIS Lead to ensure all providers have access to the tools they need to ensure high data quality, including training, data quality reports, encouragements to maintain a high level of data quality, and enforcements for nonresponsiveness to data quality concerns. While the HMIS Lead is responsible for a large part of the overall DQMP, the CoC will maintain a high level of involvement to ensure providers respond to data quality concerns and that the data quality within the HMIS is both acknowledged and addressed on an ongoing, iterative, continual basis and in an objective, data-driven manner.

The following addresses how the CoC will both encourage and enforce the DQMP, with transparency about how a provider's data quality can bring about both incentives and consequences. The DQMP is then broken out into the various components of data quality: completeness, timeliness, accuracy, consistency, and bed coverage. The sections will address the baseline minimum requirements to maintain a sufficient level of data quality and, depending on the section, the baseline minimum requirement will be broken out by project type. The Data Quality Monitoring Visit Report and Improvement Plan is a tool that will be used for providers and end users consistently failing to maintain a baseline minimum requirement; specifics of how that will be determined and what the tool includes are described in that section.

The DQMP ends with an Appendix about the expectation of the HMIS Lead and the data quality baseline minimum requirements for provider and system setup and maintenance of the overall HMIS to ensure it runs effectively and efficiently. This

section is used to assist the CoC in ensuring the HMIS Lead is maintaining a high level of system setup data quality to ensure accurate reporting on behalf of the CoC.

The DQMP is a living, evolving tool that will change as the community and its HMIS data needs.

## Encouragements and Enforcements

The CoC works with the HMIS Lead to ensure providers have access to all the support and tools they need to ensure a high level of data quality within the HMIS. The CoC will monitor data quality in conjunction with the HMIS Lead, and the following encouragements and enforcements are in place to ensure providers understand the importance of data quality within HMIS.

### *Encouragements*

- The CoC Board will make data quality a meeting agenda item at every Board meeting and will acknowledge providers meeting a high level of data quality in the meeting minutes which will be posted on the CoC's website.
- The CoC will acknowledge the work of providers meeting a high level of data quality every quarter during the CoC General Membership Meeting, via the CoC e-newsletter, or other public forums that acknowledge the work done to address data quality in HMIS.
- The CoC will use data quality in HMIS during the annual rank and review process for CoC dollars. In order to be eligible for CoC dollars, projects will need to maintain a baseline threshold data quality requirement and will be awarded additional points for going above and beyond the baseline. Guidance on specifics of this process will be released each year with the local CoC NOFA competition process.
- The CoC will work with state and local funders to also use data quality metrics when making funding allocation decisions to providers/projects. The CoC will encourage state and local funders to use the same process the CoC uses during the annual rank and review process for CoC dollars.
- The CoC will work with providers who do not currently use HMIS and talk through the reasons why they do not use HMIS. Depending on the reasons, the CoC will work with the providers to make HMIS a realistic option.

### *Enforcements*

The CoC will work with the HMIS Lead to monitor data quality at the user, project, agency, and system level. Enforcements will depend on where data quality issues lie and could include the following:

- Locking specific providers or users out of HMIS until they receive remedial or additional training from the HMIS Lead and show that data quality is a focus.
- Removing the ability of a given user to access and enter data into HMIS if data quality becomes a consistent issue that is not acknowledged or addressed.

- Restricting additional funding, or withholding funding, from projects until data quality meets, at a minimum, the baseline threshold for the given project type.
- Preventing agencies from applying for new or additional dollars during RFP processes.

## Data Quality Benchmarks

### *Data Completeness*

Data Completeness looks at how much of the data fields for any given client, project enrollment, provider, agency, or system are filled in or answered. The definition used in the CoC Data Quality Brief is: “The degree to which all required data is known and documented.” Data Completeness looks at missing or null values; “data not collected” values; and, depending on the data field, “client doesn’t know,” “client refused,” and/or “other” values.

Data Completeness is usually one of the first pieces of overall data quality that is addressed because it is the simplest to measure—it is easy to report on what is or is not in HMIS based on what is required to be in HMIS for any given project type.

The HMIS Lead will run Data Completeness reports on a monthly basis and send them to providers. Those providers who fall below the baseline requirement for Data Completeness for their project type will be asked to clean up their data within a certain timeframe. For consistent issues with Data Completeness, providers may be directed to create a Data Quality Improvement Plan (DQIP).

#### *Street Outreach*

- 90 percent of required data elements (only applies after the client has a Date of Engagement).

#### *Emergency Shelter*

- 95 percent of required data elements.

#### *Services Only (Excludes Coordinated Entry).*

- 90 percent of required data elements.

#### *Transitional Housing*

- 98 percent of required data elements.

#### *Rapid Rehousing*

- 100 percent of required data elements.

#### *Permanent Supportive Housing*

- 100 percent of required data elements.

#### *Coordinated Entry*

- 100 percent of required data elements (only applies after the client reaches a specific point in the coordinated entry process).

### *Homelessness Prevention*

- 90 percent of required data elements.

## **Data Timeliness**

Entering data into HMIS in a timely manner is necessary to ensure that clients receive the services they need quickly and efficiently. Additionally, timely data entry ensures that regular, accurate reporting can be done through HMIS. Users who enter data into HMIS in a timely manner are less likely to make data entry errors and are more likely to focus on overall data quality. Per a July 2005 publication, HUD recommends that projects enter data into HMIS, at most, within 48 hours of collecting the information from the client.

The HMIS Lead will run Data Timeliness reports on a monthly basis and send them to providers. Those providers who fall below the baseline requirement for Data Timeliness for their project type will be asked to work with the HMIS Lead to make sure that they can meet the Data Timeliness standard moving forward. For consistent issues with Data Timeliness, providers may be directed to create a DQIP.

### *Street Outreach*

- Live time or within 24 hours of contact with the client.

### *Emergency Shelter*

- Live time or within 24 hours of contact with the client.

### *Services Only (Excludes Coordinated Entry)*

- Live time or within 48 hours of contact with the client.

### *Transitional Housing*

- Live time or within 48 hours of contact with the client.

### *Rapid Rehousing*

- Live time or within 48 hours of contact with the client.

### *Permanent Supportive Housing*

- Live time or within 48 hours of contact with the client.

### *Coordinated Entry*

- Live time or within 24 hours of contact with the client.

### *Homelessness Prevention*

- Live time or within 48 hours of contact with the client.

## **Data Accuracy**

Data Accuracy is not as easy to manage or monitor and requires specific reports that look at congruency between and among responses to data elements within the system, as well as checks between what the client has told an intake worker and what data is entered into HMIS.

The HMIS Lead will run Data Accuracy reports on a monthly basis and send them to providers. The goal for all project types and all data entered into HMIS is 100 percent Data Accuracy. Those providers who show issues with Data Accuracy will be asked to clean up their data within a certain timeframe. For consistent issues with Data Accuracy, providers may be directed to create a DQIP.

Data quality reports will look at Data Accuracy between and among responses to data elements including:

- Date of birth and project start date (ensure the two are not the same, especially for heads of households);
- 3.917 data elements (ensure that the responses to residence prior to project entry, length of stay in prior living situation, approximate date homelessness started, number of times experiencing homelessness in the last three years, and number of months experiencing homelessness in the last three years do not conflict with each other);
- Disabling condition yes/no and types of disabling conditions (ensure these do not conflict);
- Health insurance yes/no and sources of insurance (ensure these do not conflict);
- Income yes/no and sources of income (ensure these do not conflict);
- Non-Cash benefits yes/no and sources of non-cash benefits (ensure these do not conflict);
- Domestic violence victim/survivor and subsequent data elements (if the first answer is no, are the other questions answered, etc.);
- Relationship to head of household (are there multiple heads of household or no head of household?);
- Client location (is the client location defined as a community outside of the applicable CoC?);
- Veteran (is a minor-aged individual defined as a veteran?); and
- A given project only includes clients of a specific gender (if that project is not dedicated to only serving a specific gender).

Additionally, the Longitudinal System Analysis Guide looks at specific data quality issues in relation to that system-wide submission to HUD on an annual basis. These specific data quality and data accuracy pieces should be addressed in the reports run by the HMIS Lead on an ongoing basis.

The CoC, in partnership with the HMIS Lead, will also work with providers to review, at regular intervals, the data collected directly from clients (either on paper forms or by being present during intakes with clients) and the data entered into HMIS to ensure that the data entered into HMIS matches the client's reality. This will be done, at a minimum, during annual formal onsite monitoring visits, and will also occur at other points throughout the year.

## ***User Access and Consistency***

Users with access to HMIS should be entering data on a regular and consistent basis, not only to prevent a backlog of data entry, but also to ensure users maintain familiarity with the HMIS and the workflows for which they are responsible.

The HMIS Lead will monitor user login and access to HMIS monthly by running a report that shows when users last logged into the system. If users have not logged into HMIS within the last 30 days of the report run date, the HMIS Lead will contact the user and ask if they still need access to the system. If the user responds that they



do still need access, the HMIS Lead will ensure that the user has maintained sufficient data quality and does not need remedial training. If the user does not have a high level of data quality, the HMIS Lead will provide remedial training for the user.

If the user is non-responsive to any inquiries about their access to HMIS, the HMIS Lead will contact the user's direct supervisor and include the CoC Lead. If the HMIS Lead is informed that the user is no longer an active participant in HMIS data entry, the user's license will be removed from HMIS. If the direct supervisor of the user informs the HMIS Lead that the user is still an active user, the user will be required to connect directly with the HMIS Lead to complete any necessary remedial trainings to maintain a high level of data quality in the system.

Should the HMIS not hear from either the user or the user's direct supervisor, the user license will be removed from the system.

## *HMIS Bed Coverage*

The importance of a high percentage of HMIS Bed Coverage for all project types is an emphasis of the HUD TA Data Strategy. Without a high percentage of HMIS Bed Coverage within a CoC, the data within HMIS is never holistic and the story told with HMIS data about homelessness within the CoC is never fully accurate. A lack of high HMIS Bed Coverage prevents CoCs from truly understanding how both their system, and the clients served within their system, are functioning.

While extrapolation techniques can work for some research and reporting purposes, the extrapolation will only be as accurate as the similarities between any given projects, processes, and clients served by the projects. Therefore, the goal for HMIS Bed Coverage for all project types is 100 percent.

The HMIS Lead, in conjunction with the CoC Lead, will ensure that Bed Coverage is as close to 100 percent as is possible for all project types. This includes a review of the CoC's most recent Housing Inventory Chart (HIC) to know which providers participated in the most recent HIC but are not entering data into HMIS.

Ensuring a CoC's HMIS Bed Coverage reaches 100 percent (and stays at 100 percent) also requires implementing a process to ensure that any new projects that become available to serve clients at risk of or experiencing homelessness are communicated to the CoC so that HMIS data entry can be encouraged and/or required for the new project.

Below are things to do to ensure HMIS Bed Coverage reaches or maintains 100 percent:

- Review the HIC on a quarterly or semi-annual basis to ensure all projects (with the exception of victim services providers) are entering data into HMIS;

- If projects are included on the most recent HIC that do not enter data into HMIS, the CoC and HMIS Lead should find out why this is the case and target any solutions to the specific reason; and
- For any new project that becomes available within the CoC that will serve clients at risk of or experiencing homelessness, the CoC should be made aware and work with the HMIS Lead to ensure the new project is encouraged and/or required to enter data into HMIS.

## Data Quality Monitoring Visit Report and Improvement Plan

The Data Quality Monitoring Visit Report will be used annually during agency monitoring to ensure that all HMIS participating agencies are in compliance with HMIS policies and procedures, agency agreements, user agreements, and any other documents governing the use of HMIS. If deficiencies are identified in any area during the monitoring visit, the Improvement Plan will be used to assist the agency in addressing issues using concrete, time-bound action steps.

If, at any time, the HMIS Lead has documented one or more ongoing issues related to data quality with a given agency (ongoing is defined as the issue lasting longer than a specific period of time as defined by the CoC and HMIS Lead consecutively without resolution), an Improvement Plan will be implemented with the agency, with or without an accompanying monitoring visit.

## Appendix

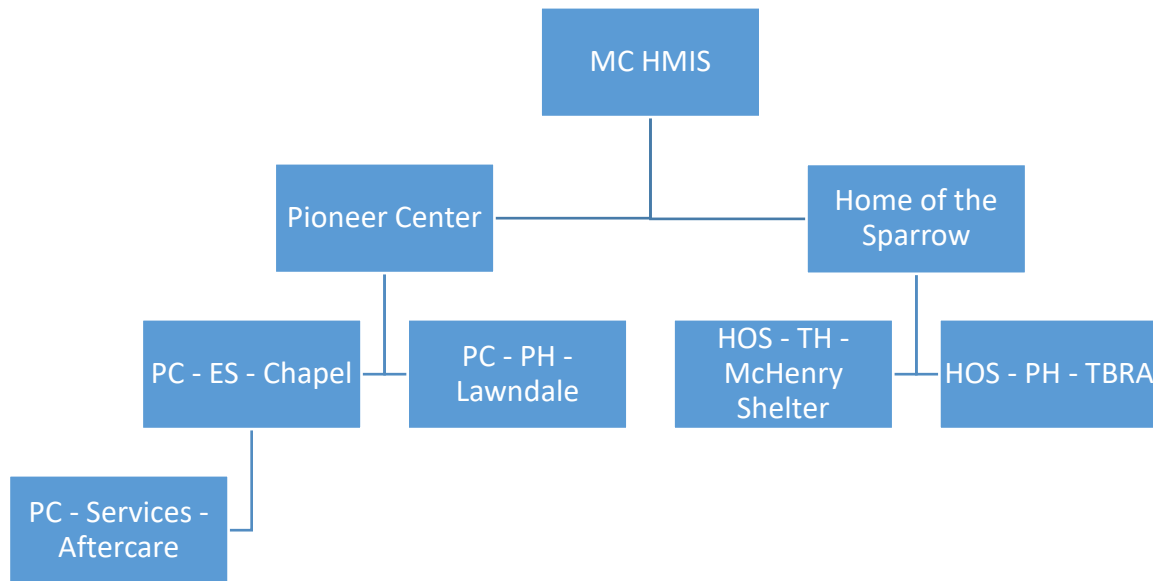
While HMIS data quality is mainly focused on the users, projects, providers, agencies, and CoCs entering data into the system, ensuring that the “behind the scenes” or provider and system setup side of HMIS is completed correctly is vital to ensure accurate reporting and functionality.

Ensuring the provider and system setup of HMIS is done correctly is the responsibility of the HMIS Lead, with the support of the CoC. Reviewing the provider and system setup of HMIS should be an ongoing process for the HMIS Lead and the processes taken to ensure provider and system setup should be documented and easily replicable based on that documentation.

### *Naming Conventions*

Projects in HMIS should have a consistent naming convention that includes, at a minimum, the Provider Name, Project Type, and specific populations served. It may benefit the HMIS Lead to also include grant types (CoC, ESG, SSVF, RHY, etc.) in the overall naming convention of projects to easily locate projects funded with specific funding streams. Any new projects entering HMIS should follow these guidelines.

The McHenry County HMIS supports different “levels” for projects, the HMIS Lead ensures that the “levels” are consistent across the system. The hierarchy chart below demonstrates how these levels work. McHenry County HMIS acts as the uppermost level of the hierarchy with each participating agency below. Each HMIS project that an agency runs will then be set up below them (example below).



The HMIS Lead will document the Naming Convention used and create a “provider tree” that mimics what is in HMIS for easy reference.

#### *Project Descriptor Data Elements (PDDEs)*

The Project Descriptor Data Elements (PDDEs) are the “back end” data elements required to be completed by the HMIS Lead to ensure projects in the system are typified correctly.

- Project type is defined to ensure projects are pulled correctly into reports;
- Bed and unit inventory is up-to-date and is available for the Point-in-Time (PIT) Count and Longitudinal System Analysis (LSA) reports;
- Specific workflow is defined by project type;
- Specific grants and/or federal partner funding sources are identified;
- Target populations are listed; and
- The CoC(s) in which the provider operates is identified.

The HMIS Lead will obtain this information from the Agency Admin related to the project by email or virtual meeting. In preparation for the annual LSA, the HMIS Lead will send participating agencies a list of all active projects and their PDDEs. The Agency Admin must confirm and/or correct their list and return it to the HMIS Lead within 7 days.

### *Visibility*

Ensuring the visibility in HMIS is set up correctly so that users can see what they are supposed to see and, alternatively, not see what they are not supposed to see, is critical. The visibility within the McHenry County HMIS is determined by each client's Release of Information (ROI). All clients entering a HMIS project should be asked whether they are willing to sign an ROI.

An ROI is NOT required to enter client data into HMIS, but it IS required to make client data available to other agencies using HMIS.

If the client is willing to sign the ROI, the case manager must identify which HMIS projects are covered by the ROI (*NOTE: selecting ONLY the agency will not suffice. The individual HMIS project/s that the client is entering must be selected*).

If the client does not wish to sign an ROI, the case manager should note this in the ROI section of the Client Profile in HMIS.

ROIs are valid for 1 year and the case manager must mark the "end date" for the ROI accordingly.

# Appendix A. HMIS Data Quality Monitoring Visit Report and Improvement Plan

## Data Quality Monitoring Visit Report

Date of Monitoring Visit: \_\_\_\_\_

Person Conducting Monitoring Visit: \_\_\_\_\_

Name of Organization: \_\_\_\_\_

Organization Contact and Information: \_\_\_\_\_

Name of Project and Type of Project Monitored: \_\_\_\_\_

Organization Staff Present During Monitoring:

**Each baseline and expectation met below accounts for (\_\_\_\_) points for a total of (\_\_\_\_) allowable points.**

**Include the specific baseline requirements for the project type to be monitored:**

Data Completeness baseline: \_\_\_\_\_ Baseline Met?  Yes  No

Data Timeliness baseline: \_\_\_\_\_ Baseline Met?  Yes  No

Data Accuracy baseline: \_\_\_\_\_ Baseline Met?  Yes  No

Data Consistency expectation met?  Yes  No

Coverage & Utilization expectation met?  Yes  No  Not applicable

**Total Score:** \_\_\_\_\_

Each item in the “observed” column accounts for (\_\_\_) points for a total of (\_\_\_\_) allowable points. The combined total of the total score in the section above and the total score in the section below results in the specific project’s monitoring visit score. Projects with scores between (\_\_\_) – (\_\_\_) will be determined as “exceeding expectations.”

Projects with scores between (\_\_\_) – (\_\_\_) will be determined as “meeting expectations.”

Projects with scores between (\_\_\_) – (\_\_\_) will be determined as “below expectations.”

Projects with scores between (\_\_\_) – (\_\_\_) will be determined as “severely at-risk.”

For those in the “outcome” column defined as “Action Needed,” the “Notes” section must include action steps with specific timelines.

Requirement	Observed	Outcome	Notes
Data Collection & Quality	_____	The project has not required the use of a Data Quality Improvement Plan (DQIP) to address data quality issues since the last monitoring visit.	_____ Action Needed
	_____	The organization documents the homeless status of clients served, as well as any other eligibility criteria for the project.	_____ In Compliance
	_____	Intake workers and HMIS users understand the required data elements and how to present them to clients in a way to get accurate information.	
	_____	The organization’s paper intake forms, if applicable, include all data elements required to be entered into HMIS.	

	_____	Random selection of client files show the complete data collection process and match data entry in HMIS.		
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**Upon completion of monitoring visit:**

DQIP needed?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

If yes, has the plan been created?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

Notes

\_\_\_\_\_  
Person completing the monitoring visit signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Monitored organization staff member signature

\_\_\_\_\_  
Date

# Data Quality Improvement Plan

Date of DQIP Implementation: \_\_\_\_\_

Name of Organization: \_\_\_\_\_

Organization Contact and Information: \_\_\_\_\_

Name of Project(s) Included in DQIP

Organization Staff Responsible for DQIP:

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_

HMIS Lead Staff Responsible for DQIP:

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_

CoC Staff Responsible for DQIP:

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_

\_\_\_\_\_  
Staff Person Role \_\_\_\_\_