Central New York Homeless Management Information System (CNY HMIS)
Policies and Procedures

The Housing & Homeless Coalition of Central New York
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Introduction:

The Housing and Homeless Coalition of Central New York (HHC of CNY) through a HUD contract supported by the Continuum of Care NY-505 administers the Central New York Homeless Management Information System (CNY HMIS). The project utilizes Internet-based technology to assist homeless service and public service organizations across the County to capture information about the clients that they serve. The HMIS System Administrator provides technology, training and technical assistance to users of the system throughout Onondaga, Oswego, & Cayuga Counties. The goal of CNY HMIS is to inform public policy about the extent and nature of homelessness in the Continuum of Care and as a tool for other public service organizations to complete Outcome Based Performance Measures reporting. This is accomplished through analysis and release of data that are grounded in the actual experiences of homeless and at-risk persons and the service providers who assist them throughout the Continuum of Care. Information that is gathered through intakes, conducted by service providers with consumers, is analyzed for an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives.

The Continuum of Care is committed to understanding the gaps in services to consumers of the human service delivery system in an attempt to end homelessness and to provide more effective public services. The CoC is committed to balancing the interests and needs of all stakeholders involved.

Benefits for Case Managers and Clients:

Case managers can use the software as they assess their clients' needs to inform clients about services offered either on site or elsewhere throughout Onondaga, Oswego, and Cayuga Counties, available through referrals. Case managers and clients can use on-line resource information to learn about resources that help clients find and keep permanent housing or meet other goals clients have for themselves. Service coordination can be improved when information is shared among case management staff within one agency and with staff in other agencies (with written client consent) who are serving the same clients.

Benefits for Agency and Program Managers:

Aggregated information can be used to garner a more complete understanding of clients' needs and outcomes, and to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funders such as United States Department of Housing and Urban Development (HUD) and the State of New York. The software has the capability to generate required reports including the HUD Annual Progress Report (APR), Emergency Services Grant (ESG) Monthly Statistical Report, and other reports as requested.

Benefits for Community-wide Continua of Care and Policymakers:

Involvement in CNY HMIS provides the capacity to programs within a Continuum of Care to generate aggregate reports that can assist in completion of the HUD required gaps chart and to utilize the aggregate data to inform policy decisions aimed at addressing and ending homelessness at local, state, and federal levels. This document provides the policies, procedures, guidelines, and standards that govern CNY HMIS, as well as, roles and responsibilities for HHC, participating agencies and staff. Participating agencies will receive all relevant portions of the complete document.

Governing Principles:

Described below are the overall governing principles upon which all other decisions pertaining to CNY HMIS are based.

Data Integrity:

Data is the most valuable asset of CNY HMIS. It is our policy to protect this asset from accidental or intentional unauthorized modification, disclosure, or destruction. All CNY HMIS participants are also required to input at least the minimum data requirements as prescribed by Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice (FR 4848-N-02) (See Appendix I).

Access to Client Records:

The Client Records Access Policy is designed to protect against the recording of information in unauthorized locations or systems. Only staff who work directly with clients or who have administrative responsibilities will receive authorization to look at, enter, or edit client records. Additional privacy protection policies include:
- Except as permitted by State law or regulations, no client records will be shared electronically with another agency without written consent;
- Client has the right to not answer any question unless entry into a service program requires it;
- Client has the right to know who has added to, deleted from, or edited their client record;
- Client information transferred from one authorized location to another over the web is transmitted through a secure encrypted connection.

Application Software:

Only tested and controlled software should be installed on networked systems. Use of unevaluated and untested software outside an application development environment is prohibited.

Computer Crime:

Computer crimes violate state and federal law as well as the CNY HMIS Policies and Procedures. They include but are not limited to: unauthorized disclosure, unauthorized modification or destruction of data, programs, or hardware; illegal copying of software; invasion of privacy; theft of hardware, software, peripherals, data, or printouts; misuse of communication networks; promulgation of malicious software such as viruses; and breach of contract. Perpetrators may be prosecuted under state or federal law, held civilly liable for their actions, or both. The HMIS System Administrator and authorized agencies must comply with license agreements for copyrighted software and documentation. Licensed software must not be copied unless the license agreement specifically provides for it. Copyrighted software must not be loaded or used on systems for which it is not licensed.

End User Ethics:

Any action taken with a specific intent that adversely affects the resources of any participating organization or institution or employees is prohibited. Any action taken with a specific intent that adversely affects any individual is prohibited. Users are prohibited to use CNY HMIS computing resources for personal purposes. Users must not attempt to gain physical or logical access to data or systems for which they are not authorized. Users must not attempt to reverse-engineer commercial software. Users are prohibited to load unauthorized programs or data onto CNY HMIS. Users should scan all computer programs and data for viruses before logging onto CNY HMIS.

Definitions:
HMIS Staff:
- HMIS Compliance Officer- oversight of CNY HMIS, compliance with internet confidentiality and privacy policies
- HMIS System Administrator- is responsible for the implementation, training and technical assistance and reporting functions.

COC (Continuum of Care – NY 505)
- COC data administrators group makes recommendations to the CoC; otherwise known as the HHC of CNY who have the final decision for all Policies and Procedures regarding CNY HMIS

Agency Staff :
- Participating Agency- is any agency that receives federal funding or state for homeless services or any public service that is in need of performance based outcome measures.
- Agency Executive Director- is responsible for all agency staff that have access to CNY HMIS.
- Agency Administrator- is responsible for the administration of the software for his or her agency.
- End User- is responsible for data input, data security, and data integrity.

Section One:
Contractual Requirements and Roles

1.1 CNY HMIS Contract Requirements

Policy: The HMIS staff shall provide technical assistance to all Participating Agencies.

The HMIS staff is committed to providing quality service to existing and new participating agencies. All existing and new agencies participating in CNY HMIS that are funded through the United States Department of Housing and Urban Development (HUD) and the Emergency Solutions Grant   will have user licenses and technical assistance covered under their current contracts. Please note: Participating Agencies are responsible for all costs associated with maintenance, personnel, and internet access. In order to participate in CNY HMIS, all existing and new participating agencies must sign an Agency Participation Agreement (Attachment I) with the CNY HMIS System Administrator.

The CNY HMIS license costs will be covered for agencies funded through the United States Department of Housing and Urban Development (HUD) and the Emergency Solutions Grant (ESG), and the licenses costs for non-mandated participants will be covered as budget constraints allow. Non-mandated participants will be required to cover their CNY HMIS licensing costs if CNY HMIS must reallocate the license funds due to budget restraints or the addition of a participating agency that is funded by HUD or ESG.

CNY HMIS License Allocation Priorities:
1. SHP (HUD CoC) funded
2. ESG funded
3. RHY HHS funded
4. SSVF funded
5. Emergency Shelter/ Department of Social Services funded
6. HOPWA Funded
7. Non-mandated participating agency

*All agencies selected to be a part of HMIS must meet one or more of the CNY HMIS Goals mentioned in the Agency Partnership Agreement. (See Attached document)
** The cost of a User license is approximately $350 a year and each license purchase will be prorated based upon the grant funding year, which is July 1st to June 30th.

Effective Date: 08/01/2016

1.2 CNY HMIS Governing Structure and Management

Policy: The System Administrator @ The Housing and Homeless Coalition of Central New York (HHC of CNY) shall manage the structure that supports CNY HMIS and the CoC shall make final policy decisions with advice from the data administrators group.

The HHC of CNY advises and supports CNY HMIS operations in the following programmatic areas: resource development; consumer involvement; and quality assurance/accountability.   The HMIS System Administrating of CNY HMIS shall be:
- HHC of CNY HMIS System Administrator
- HHC of CNY Coordinator

The CNY HMIS management structure will adequately support the operations of the CNY system according to the Guiding Principles described in the Introduction. The HMIS System Administrator is responsible for oversight of all day-to-day operations including: technical infrastructure; planning, scheduling, and meeting project objectives; supervision of staff, including reasonable divisions of labor; and orientation of new agency staff to program operations, and developing and enforcing the Policies and Procedures.

The HHC of CNY is responsible for the overall direction and ongoing oversight of CNY HMIS operations and usage of the application Service Point, CoC has assigned The Housing and Homeless Coalition of Central New York as the designated HMIS lead agency below are the listed responsibilities and duties which include:

- Implementing CNY HMIS to CNY CoC Participating Agencies
- Coordination of CNY HMIS grant writing applications and technical submissions
- Providing technical assistance and troubleshooting as needed
- Providing technical assistance in generating required reports
- Plans project schedules, coordinates efforts between departments and clients
- Plans and coordinates configurations and operations of all CNY HMIS personal computers.
- Designs and implements training program for all end users
- Provide technical assistance and troubleshooting as needed and generating required reports

The HHC of CNY Membership shall be the decision maker of all policies and procedures by which CNY HMIS is governed, and shall receive recommendations from The CNY HMIS Advisory Council.

- The CNY HMIS Data Administrators Group will be the official advisory body that recommends governance of the CNY HMIS Policies and Procedures. The Data Administrators will meet every other month and will consist of one agency representative from each of the agencies that are submitting data as well as the CoC lead and any other interested agency that has data reporting requirements to the CoC.
- The Policy and Procedure Manual will be updated annually and revisions will be made as required by HUD HMIS Standards or changes to the current functioning of CNY HMIS.

Effective Date: 08/01/2016

1.3 Data Analysis

Policy: The HMIS system administrator shall be responsible for Data Analysis.

Data analysis is as follows:
- Providing data quality queries to Participating Agencies on a regular basis
- Providing detailed reports on families and individuals accessing services
- Providing data analysis and reports for Continuum of Care

Effective Date: 08/01/2016

1.4 System Administration, Security, and User Accounts:

Policy: System security and integrity shall be reviewed on a regular basis.

THE HMIS SYSTEM ADMINISTOR has a contract with Bowman Internet Systems, LLC (Service Point) to host the central server (located in Shreveport, Louisiana). They will have overall responsibility for the security of the system. See Appendix III: Bowman Internet Systems, LLC Disaster Recovery Options for a full policy review.

The HMIS System Administrator will review all network and security logs regularly. All Agency Administrators and Agency staff user accounts are the responsibility of the HMIS SYSTEM ADMINISTRATOR staff. The Agency Administrator is responsible for reviewing his or her agencies accounts on a regular basis.

Effective Date: 08/01/2016

1.5 Agency Executive Director

Policy: The Executive Director of each Participating Agency shall be responsible for all agency staff that has access to CNY HMIS.

The Executive Director of each Participating Agency will be responsible for oversight of all agency staff that generate or have access to client-level data stored in CNY HMIS. The Executive Director holds final responsibility for the adherence of his or her agency's personnel to the CNY HMIS Polices and Procedures outlined in this document. The Participating Agency's Executive Director is responsible for all activity associated with agency staff access and use of the Service Point data system. The Executive Director shall establish and monitor agency procedures that meet the criteria for access to the Service Point data system, as detailed in the Policies and Procedures outlined in this document. The Executive Director will ensure that the Agency and its staff fully comply with Attachment II: User Policy Agreement and hereby agrees to fully indemnify and hold harmless HHC from any unauthorized use, improper use, or misuse of the software and the system by the Agency and/or its staff, or any violation of law arising out of or in connection with the acts or omissions of the Agency and its staff and the Agency's participation in the CNY HMIS reporting process. The Executive Director agrees to limit access to the Service Point software system to staff who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities.

Each Agency must ensure that each user of the software and system obtains a unique user license. Only those with a user license may access and use the software and system. Sharing of usernames and passwords is expressly forbidden. In addition, each user of the software and system must agree to Attachment II: User Policy Agreement. The Executive Director also oversees the implementation of data security policies and standards and will:

- Assume responsibility for integrity and protection of client-level data entered into CNY HMIS
- Establish business controls and practices to ensure organizational adherence to the CNY HMIS Policies and Procedures
- Communicate control and protection requirements to agency custodians and users
- Authorize data access to agency staff and assign responsibility for custody of the data
- Monitor compliance and periodically review control decisions

Effective Date: 08/01/2016

1.6 Agency Administrator

Policy: Every Participating Agency must designate at least one person to be the Agency Administrator.

Each Agency must ensure that each user of the software and system obtains a unique user license. Only those with a user license may access and use the software and system. Sharing of usernames and passwords is expressly forbidden. In addition, each user of the software and system must agree to Attachment II: User Policy Agreement located in this document. The designated Agency Administrator holds responsibility for the administration of the system software in his or her agency. This person will be responsible for:
- Editing and updating agency profile information
- Reviewing with new staff persons on the uses of the Service Point software system including review of the Policies and Procedures in this document and any agency policies which impact the security and integrity of client information
- Ensuring that access to the Service Point system be granted to authorized staff members only after they have received training from a designated trainer.
- Notifying all users in their agency of interruptions in service
- The Agency Administrator is also responsible for implementation of Data Security Policy, including
- Administering agency-specified business and data protection controls
- Administering and monitoring access control
- Detecting and responding to violations of the Policies and Procedures or agency procedures

Effective Date: 08/01/2016

1.7 User

Policy: Staff requiring legitimate access to CNY HMIS shall be granted such access.

All individuals at HHC of CNY and at the Participating Agency levels who require legitimate access to the software system will be granted such access. Individuals with specific authorization can access the system software application for the purpose of conducting data management tasks associated with their area of responsibility. The HMIS System Administrator agrees to authorize use of the Service Point Software system only to users who need access to the system for technical administration, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out CNY HMIS responsibilities.

The Participating Agency agrees to authorize use of the Service Point Software system only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out participating agency responsibilities.

Users are any persons who use the Service Point software for data processing services. They must be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure. Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with the Agency's Data Security Policy as described in these Policies and Procedures. They are accountable for their actions and for any actions undertaken with their username and password.

The Participating Agency will designate the end users and communicate the end user's name and level of access to THE HMIS SYSTEM ADMINISTRATOR before the user can begin using the system. The communication can be made in the form of and e-mail, fax, or mail.

All Users' shall sign a User Policy Agreement (Attachment II) prior to obtaining access to CNY HMIS. The User Policy Agreement (Attachment II) shall be signed annually on the first day of October. Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records.

Effective Date: 08/01/2016

Section Two:
Participation Requirements

2.1 Participation Requirements

Policy: The CoC shall communicate all requirements for participation in CNY HMIS.

   The CoC will work to ensure that all Participating Agencies receive the benefits of the system while complying with all stated Policies and Procedures.

Effective Date: 08/01/2016

2.2 System Requirements

Policy: Each computer accessing CNY HMIS shall meet Minimum System Requirements. This includes, but is not limited to, the appropriate system for running the software, appropriate internet connection, etc. that allows the proper and safe use of CNYHMIS**.**

*Please see attached document from Bowman Systems 4.0 Specifications (Attachment X)

Effective Date: 08/01/2016

2.3 Participation Agreement Requirements

Policy: Each Participating Agency shall comply with Participation Agreement Requirements.

- Identification of Agency Administrator
- The Agency Administrator and designated staff persons must commit to attending all training(s) prior to accessing the system online
- Interagency Data Sharing Agreements must be established between any service programs where sharing of client level information is to take place. See Attachment III: Interagency Data Sharing Agreement
- Client Consent Forms must be signed by all clients to authorize the entering and sharing of their personal information electronically with other Participating Agencies through the Service Point software system. See Attachment VII: Client Consent Form
- Participation Agreements must be signed by Participating Agencies. See Attachment I Agency Participation Agreement
- Agencies are required to enter minimal data elements as defined by the Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice (Appendix I)

Effective Date: 08/01/2016

2.4 Implementation Requirements

Policy: Each Participating Agency shall comply with Implementation Requirements.

- All Participating Agencies must read and understand all participation requirements and complete all required documentation prior to implementation of the system and all implementation requirements must be complete and on file with THE HMIS SYSTEM ADMINISTOR prior to using the system
- **Data Security Policy-** THE HMIS SYSTEM ADMINISTRATOR staff will assist Participating Agencies in the completion of all required documentation. A meeting of Agency Executive Director or Program Manager/Administrator and Agency Administrator with THE HMIS SYSTEM ADMINISTRATOR staff member(s) to assist in completion of the Agencies' Data Security Policy. This should include items that are listed in the Ethics Policy, such as the inability to access CNYHMIS on public Wi-Fi, i.e.: at Panera, McDonald's or any other public Wi-Fi entity.
- **Participating Agreement-** refers to the document agreement made between the participating agency and THE HMIS SYSTEM ADMINISTRATOR for CNY HMIS. This agreement includes commitment to minimal data as defined by Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice. This document is the legally binding document that refers to all laws relating to privacy protections and information sharing of client specific information
- Upon completion of a security assessment, each agency must agree to abide by all Policies and Procedures set forth in this CNY HMIS Policies and Procedures document. The Executive Director will be responsible for signing the Agency Participation Agreement (Attachment I)
- **Admin Providers**- Service Point provides a resource directory component that tracks service referrals for clients. Each Participating Agency must compile a list of referral agencies, services provided, and a service area, and verify that the information has been entered into the Admin Provider section of Service Point. This is to be updated, at a minimum, yearly.
- **Timeliness Policy**- Agencies must create an internal mechanism that ensures client level data is entered in a timely manner. A timely manner shall be defined as within thirty (30) days of initial contact with the client. This policy shall affect the HUD Minimum and Program Specific Data Elements. There is a higher standard for the Entry/Exit and Shelter Point Processes.
- **Entry/Exit and Shelter Point Policy**- All Participating Agencies shall utilize the Entry/Exit process for every client entered into CNY HMIS. Additionally, every Participating Agency that has an Emergency Shelter housing component must utilize Shelter Point. These two processes are integral to timely and accurate reporting and shall be completed within twenty-four (24) hours of the beginning or ending of an incident of housing. Every Participating Agency will be held to this standard unless the HMIS Data Administrators Group has officially exempted them.

Effective Date: 08/01/2016

2.5 Confidentiality and Informed Consent

Policy: Each Participating Agency shall comply with the Confidential and Informed Consent Protocol.

All Participating Agencies agree to abide by all privacy protections, laws, regulations, and standards and agree to uphold all standards of privacy as established by HHC. Participating Agencies shall develop procedures for providing the Client Fact Sheet (Attachment VI) to clients about the usage of CNY HMIS. Participating Agencies are also required to use either Implied Consent or written Client Consent Forms when information is to be entered within CNY HMIS.

All clients shall be provided a Client Fact Sheet (Attachment VI) for non-shared records that their information will be entered into a computerized record keeping system (CNY HMIS) that the client must sign. The Participating Agency should provide an oral explanation of CNY HMIS and the terms of consent. The agency shall post the CNY HMIS Notice of Uses and Disclosures (Attachment IV) within the agency and provide any client that requests more information with the CNY HMIS Uses and Disclosures Brochure (Attachment V). Clients will be notified of the following information:

- What Service Point is, a web based information system that homeless and public service agencies across the state use to capture information about the persons they serve
- Why the agency uses it, to understand their clients' needs and help the programs plan to have appropriate resources for the people they serve, and to inform public policy
- **Who Has Access**- Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records
- No information will be released to another agency without written consent
- **Right of Refusal**- Client has the right to not answer any question, unless entry into a program requires it; Client has the right to know who has added to, deleted, or edited their Service Point record; Information that is transferred over the web is through a secure, encrypted connection
- Each Client whose record is being shared electronically through CNY HMIS must agree via written Client Consent Form to have their data shared. A client must be informed what information is being shared and with whom it is being shared. The Participating Agency agrees not to release client identifiable information to any other organization pursuant to federal and state law without proper client consent. See Attachment VII: Client Consent Form
- The Participating Agency will uphold Federal and State Confidentiality regulations to protect client records and privacy. In addition, the Participating Agency will only release client records with written consent by the client
- The Participating Agency will abide specifically by the Federal confidentiality rules as contained in 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal rules prohibit the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Participating Agency understands that the Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
- The New York State Office of Temporary and Disability Assistance (OTDA) will maintain a database of client information, as input in HMIS systems across New York State. The purpose of the database is to better understand characteristics, trends, and movement of persons who are homeless or at risk of or experiencing homelessness, as well as to analyze the utilization and effectiveness of services created to assist such persons. The database is constructed so that information that is considered personal protected information (name, social security number, date of birth) will not be shared, will not be seen by any employee of OTDA, and will never appear in any reports created out of the data warehouse.

- The Participating Agency will not solicit or input information from clients unless it is essential to meet minimum data requirements, provide services, or conduct evaluations or research

Effective Date: 08/01/2016

2.7 Minimum Data Elements

Policy: Each Participating Agencies shall input Minimum Data Elements.

Participating Agencies that collect client data through CNY HMIS will, at a minimum, collect all data contained within the Minimum Data Elements as prescribed by Notice of Homeless Management Information Systems (HMIS): Data Standards. The minimum data elements will ensure that agencies are collecting and inputting quality data. The Participating Agency is responsible for ensuring that all clients are asked a minimum set of questions for use in aggregate analysis. The minimum data elements are as follows:

- Name

- Social Security Number

- Date of Birth

- Race

- Ethnicity

- Gender

- Veteran Status

- Disabling Condition

- Residence Prior to Project Entry

- Project Entry Date

- Project Exit Date

- Destination

- Personal ID

- Household ID

- Relationship to Head of Household

- Client Location Code

- Length of Time on Street, in an Emergency Shelter or Safe Haven

Effective Date: 08/01/2016

2.8 Program Specific Data Elements

Policy: Each Participating Agencies that receives specific HUD funding shall input Program Specific Data Elements.

Participating Agencies that receive funding from HUD through the Supportive Housing Program (SHP), Shelter Plus Care program, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings program, and Housing for Persons with AIDS program (HOPWA) must collect client data through CNY HMIS. The data that these Participating Agencies are required to capture are both the Minimum Data Elements and the Program Specific Data Elements as prescribed by Notice of Homeless Management Information Systems (HMIS): Data and Technical Standards Final Notice (Appendix I)**.** The Program Specific Data Elements are required by the HUD Annual Progress Report (APR). The program specific data elements are as follows:

4.1 Housing Status
4.2 Income and Sources
4.3 Non-Cash Benefits
4.4 Health Insurance
4.5 Physical Disability
4.6 Developmental Disability
4.7 Chronic Health Condition
4.8 HIV/AIDS
4.9 Mental Health Problem
4.10 Substance Abuse
4.11 Domestic Violence
4.12 Contact
4.13 Date of Engagement
4.14 Bed Night
4.17 Placement in Permanent Housing & Date
4.18 Housing Assessment Disposition
4.19 Housing Assessment at Exit

Program-Specific Data Elements that have been developed by one of the federal partners and are only required for their use are:

HHS-PATH Only Required Elements
4.14A Services Provided – PATH Funded
4.16A Referrals Provided - PATH
4.20 Path Status
4.21 Connection with SOAR

HHS-RHY Only Required Elements
4.14B Services Provided – RHY
4.16B Referrals Provided - RHY
4.22 RHY-BCP Status
4.23 Sexual Orientation
4.24 Last Grade Completed
4.25 School Status
4.26 Employment Status
4.27 General Health Status
4.28 Dental Health Status

4.29 Mental Health Status
4.30 Pregnancy Status
4.31 Formerly a Ward of Child Welfare/Foster Care Agency
4.32 Formerly a Ward of Juvenile Justice System
4.33 Yong Persons' Critical Issues
4.34 Referral Source
4.35A Commercial Sexual Exploitation
4.35B Labor Exploitation
4.36 Transitional, Exit care or Aftercare Plan and Actions
4.37 Project Completion Status
4.38 Family Reunification Achieved

HUD-HOPWA Required Elements
4.14C Services Provided – HOPWA
4.15A Financial Assistance Provided – HOPWA
4.39 Medical Assistance
4.47 T-cell (CD4) and Viral Load

HUD-RHSAP Required Elements
4.40 Worst Housing Situation

VA-SSVF Required Elements
4.14D Services Provided – VA
4.15B Financial Assistance Provided – VA
4.41 Veteran's Information
4.42 Percent of AMI
4.43 Last Permanent Address
4.44 HP Screening Score
4.45 VAMC Station Number

Effective Date: 08/01/2016

2.9 Data Security Policy

Policy: Participating Agencies must develop and have in place minimum information security protocols.

Information Security Protocols or procedures will protect the confidentiality of the data and to ensure its integrity at the site, as well as, the confidentiality of the clients. At a minimum, a Participating Agency must develop rules, protocols or procedures to address each of the following:
- Unattended workstations
- Physical access to workstations
- Policy on user account sharing
- Client record disclosure
- Report generation, disclosure and storage
- Non-usage of Public Wi-Fi services

Effective Date: 08/01/2016

2.10 Implementation Connectivity

Policy: Each Participating Agency is required to obtain an adequate Internet connection.

An adequate internet connection is defined as 56K/v90 or greater, preferably 128 KBPS, DSL, or Cable. Proper Connectivity ensures proper response time and efficient system operation of CNY HMIS. The HMIS System Administrator is committed to informing all participating agencies about availability of Internet providers. Obtaining and maintaining an Internet connection greater than 56K/v90 is the responsibility of the Participating Agency.

Effective Date: 08/01/2016

2.11 Maintenance of Onsite Computer Equipment

Policy: Each Participating Agency shall maintain on-site computer equipment.

Participating Agencies commit to a reasonable program of data and equipment maintenance in order to sustain an efficient level of system operation. Participating Agencies must meet the technical standards for minimum computer equipment configuration, Internet connectivity, and data storage. Participating Agencies will ensure that an equipment and data maintenance program is adopted.

The Executive Director will be responsible for the maintenance and disposal of on-site computer equipment and data used for participation in CNY HMIS including the following:

- The Participating Agency is responsible for maintenance of on-site computer equipment. This includes purchase of and upgrades to all existing and new computer equipment for the utilization of CNY HMIS
- The Participating Agency is responsible for supporting a backup procedure for each computer connecting to CNY HMIS
- THE HMIS SYSTEM ADMINISTRATOR staff members are not responsible for troubleshooting problems with Internet Connections
- As a requirement of CNY HMIS, each agency shall install virus protection software (with automatic updates) on all computers
- As a requirement of CNY HMIS, each agency shall install a network or workstation firewall on all computers
- As a requirement of CNY HMIS, each agency shall install a password protected screensaver on all computers, set for 15 minutes
- The Participating Agency agrees to only download and store data in a secure format
- The Participating Agency agrees to dispose of documents that contain identifiable client level data by shredding paper records, deleting any information from diskette before disposal, and deleting any copies of client level data from the hard drive of any machine before transfer or disposal of property. THE HMIS SYSTEM ADMINISTRATOR staff is available to consult on appropriate processes for disposal of electronic client level data

Effective Date: 08/01/2016

Section Three:
Training

3.1 Training Schedule

Policy: The HMIS System Administrator shall maintain a CNY HMIS training schedule.

        The HMIS System Administrator staff will maintain an ongoing training schedule for Participating Agencies. The HMIS System Administrator will publish a schedule for training and will offer them regularly. Agencies are asked to RSVP for all training. Training will be offered at various sites and/or online.

        There are two basic training curricula, Agency Administrator training and End User training. The appropriate access level shall obtain the appropriate training. Agency Administrators are required to obtain both trainings.

Agency Refresher Training will be required if the following happens:
1. An agency scores below a 95% on the Projected Report Card.
2. Any major updates in CNYHMIS occur.

Effective Date: 08/01/2016

3.2 User, Administrator, and Security Training

Policy: Each CNY HMIS User must attend appropriate trainings.

All users must undergo security training before gaining access to the system. This training must include a review of CNY HMIS Policies and Procedures. THE HMIS SYSTEM ADMINISTOR will provide data security training to ensure that staff is properly trained and knowledgeable of CNY HMIS Policies and Procedures.

Agency staff must attend User Training. Agency Administrators must also attend an Administrator training in addition to User training. Agencies will be notified of scheduled training sessions.

HHC of CNY is responsible for training all new users. Users **must** receive ServicePoint training prior to being granted user privileges for the system.

Effective Date: 08/01/2016

Section Four:
User, Location, Physical and Data Access

4.1 Access Privileges to CNY HMIS

Policy: Each Participating Agency shall adhere to standard procedures in requesting and obtaining system access.

Participating Agencies will apply the user access privilege conventions set forth in this procedure. Allocation of user access accounts and privileges will be made according to the format specified in this procedure:

- User access and user access levels will be deemed by the Executive Director of the Participating Agency in consultation with the Agency Administrator. The System Administrator will generate username and passwords within the administrative function of Service Point
- The HMIS System Administrator will create all usernames using the First Initial of First Name and Last Name format. For example, John Doe's username would be jdoe. In the case where there are two people with the same first initial and last name, the user's middle initial should be placed between the initial of the first name and the last name. For example, John A. Doe and Jane L. Doe would be jadoe, jldoe. If a conflict exists beyond this naming convention, the HMIS System Administrator will deal with it on a case by case basis
- Passwords are automatically generated from the system when a user is created. The HMIS System Administrator will securely communicate the system-generated password to the user. The password and username will never be communicated in a non-secured format
- The user will be required to change the password the first time they log onto the system. The password must be between 8 and 16 characters and contain 2 numbers
- Passwords expire every 45 days
- The agency Administrator must attend an Agency Administrator Training. The Agency Administrator shall terminate the rights of a user (by inactivating the user) immediately upon termination from their current position. If a staff person is to go on leave for a period of longer than forty-five (45) days, their password should be inactivated within five (5) business days of the start of their leave. The Agency Administrator is responsible for inactivating users from the system and informing HHC. The Agency Administrator must update the access list and signed agreement on a quarterly basis
- All new users must be submitted to HHC of CNY before they can gain access to the system. All users that leave must be inactivated in the system within one (1) business day. HHC shall have the only access to delete users

Effective Date: 08/01/2016

4.2 Access Levels for System Users

Policy: Appropriate access levels shall be assigned to each CNY HMIS user.

Participating Agencies will manage the proper designation of user accounts and will monitor account usage. The HMIS System Administrator agrees to apply the proper designation of user accounts and the Agency Administrator agrees to manage the use of these accounts by agency staff. User accounts will be created by the System Administrator and deleted by the Agency Administrator under authorization of the Participating Agency's Executive Director.

There are nine (9) levels of access to the Service Point system (Spelled out in Attachment VIII: Service Point Access Matrix). These levels should be reflective of the access a user has to client level paper records and access levels should be need-based. Need exists only for those shelter staff, volunteers, or designated personnel who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities. For User Access Levels please see User Table Log (attachment XI)

Effective Date: 08/01/2016

4.3 Location Access Privileges to System Server

Policy: Participating Agencies shall enforce the location access privileges to the system server.

Only authorized computers will be able to access the system from authorized locations. Access to the system will only be allowed from computers specifically identified by the Executive Director and Agency Administrator of the Participating Agency.

Effective Date: 08/01/2016

4.4 Access to Data

Policy: Participating Agencies shall enforce the user access privileges to system server.

　　　　The user access privileges to system data server are as stated below:
- **User Access**: Users will only view the data entered by users of their own agency unless they are sharing a client with another participating agency. Security measures exist within the Service Point software system which can restrict agencies from viewing each other's data
- **Raw Data**: Users who have been granted access to the ServicePoint Report Writer tool have the ability to download and save client level data onto their local computer. Once this information has been downloaded from the ServicePoint server in raw format to an agency's computer, this data then becomes the responsibility of the agency. A participating Agency should develop protocol regarding the handling of data downloaded from the Report Writer
- **Agency Policies Restricting Access to Data**: The Participating Agencies must establish internal access to data protocols. These policies should include who has access, for what purpose, and how they can transmit this information. Issues to be addressed include storage, transmission and disposal of this data

Effective Date: 6/17/2016

4.5 Access to Client Paper Records

Policy: Participating Agencies shall establish procedures to handle access to client paper records.

These procedures will:
- Identify which staff has access to the client paper records and for what purpose. Staff should only have access to records of clients, which they directly work with or for data entry purposes
- Identify how and where client paper records are stored
- Develop policies regarding length of storage and disposal procedure of paper records
- Develop policies on disclosure of information contained in client paper records

Effective Date: 08/01/2016

4.6 Physical Access Control

Policy: Each Participating Agency shall adhere to Physical Access Control Procedures.

Physical access to the system data processing areas, equipment, and media must be controlled. Access must be controlled for the transportation of data processing media and other computing resources. The level of control is contingent on the level of risk and exposure to loss. Personal computers, software, documentation and diskettes shall be secured proportionate with the threat and exposure to loss. Available precautions include equipment enclosures, lockable power switches, equipment identification, and fasteners to secure the equipment.

- The HMIS System Administrator with the Agency Administrators within Participating Agencies will determine the physical access controls appropriate for their organizational setting based on CNY HMIS Policies and Procedures
- All those granted access to an area or to data are responsible for their actions. Additionally, those granting another person access to an area, are responsible for that person's activities
- Printed versions of confidential data should not be copied or left unattended and open to unauthorized access
- Media containing client-identified data will not be shared with any agency other than the owner of the data for any reason. CNY HMIS data may be transported by authorized employees using methods deemed appropriate by the participating agency that meet the above standard. Reasonable care should be used, and media should be secured when left unattended
- Magnetic media containing CNY HMIS data that is released and or disposed of from the Participating Agency and Central Server should first be processed to destroy any data residing on that media
- Degaussing and overwriting are acceptable methods of destroying data
- Responsible personnel must authorize the shipping and receiving of magnetic media, and appropriate records must be maintained
- CNY HMIS information in hardcopy format should be disposed of properly. This may include shredding finely enough to ensure that the information is unrecoverable

Effective Date: 08/01/2016

4.7 Unique Username and Password

Policy: Authorized users shall be granted a unique username and password.

Only authorized users will be granted a Username and Password to ensure that only authorized users will be able to enter, modify, or read data.

- Each user will be required to enter a Username with a Password in order to logon to the system
- Username and Password are to be assigned to individuals
- The HMIS System Administrator will create all usernames using the First Initial of First Name and Last Name format. For example, John Doe's username would be jdoe. In the case where there are two people with the same first initial and last name, the user's middle initial should be placed between the initial of the first name and the last name. For example, John A. Doe and Jane L Doe would be jadoe, jldoe. If a conflict exists beyond this naming convention, the HMIS Project Coordinator will deal with it on a case by case basis
- The Password must be no less than eight (8) and no more than sixteen (16) characters in length and must be alphanumeric (letters and a minimum of two (2) numbers)
- Discretionary Password Reset- Initially each user will be given a password for one time use only. The first or reset password will be automatically generated by Service Point and will be issued to the User by the System Administrator. Passwords will be communicated in secured written or verbal form. The first time, temporary password can be communicated via email. The HMIS System Administrator are available to agency staff to reset passwords, but an Agency Administrator can also reset a password
- Forced Password Change will occur every forty-five (45) days once a user account is issued. Passwords will expire and users will be prompted to enter a new password. Users may not use the same password consecutively, but may use the same password more than once
- Unsuccessful Logon- If a User unsuccessfully attempts to logon three (3) times, the Username will be "locked out", access permission revoked and unable to gain access until their password is reset in the manner stated above
- Access to computer terminals within restricted areas should be controlled through a password and other physical security measures;
- Each user's identity should be authenticated through an acceptable verification process
- Passwords are the individual's responsibility, and users cannot share passwords

Effective Date: 08/01/2016

4.8 Right to Deny User and Agency Access

Policy: Violations of the Policies and Procedures shall result in denial to CNY HMIS.

Any Participating Agency or User access may be suspended or revoked for suspected or actual violation of the Policies and Procedures. Any violation by users of the system may result in the suspension or revocation of an agency's access. The suspension or revocation process is as follows:

- All potential violations of any Policies and Procedures will be investigated
- Any user found to be in violation of Policies and Procedures will be sanctioned accordingly, or sanctions may include but are not limited to; a formal letter of reprimand, suspension of system privileges, revocation of system privileges, termination of employment and criminal prosecution
- Any agency that is found to have consistently and or flagrantly violated Policies and Procedures may have their access privileges suspended or revoked
- All sanctions are imposed at the sole discretion of the HHC of CNY Staff.

Effective Date: 08/01/2016

4.9 Data Access Control

Policy: Participating Agencies and The HMIS System Administrator shall monitor access to system software.

Agency Administrators at Participating Agencies and The HMIS System Administrator will regularly review user access privileges and remove identification codes and passwords from their systems when users no longer require access. Agency Administrators at Participating Agencies and The HMIS System Administrator must implement discretionary access controls to limit access to CNY HMIS information when available and technically feasible. Participating Agencies and The HMIS System Administrator must audit all unauthorized accesses and attempts to access CNY HMIS information. Participating Agencies and The HMIS System Administrator also must audit all accesses and attempts to access CNY HMIS. Audit records shall be kept at least six (6) months, and Agency Administrators and The HMIS System Administrator will regularly review the audit records for evidence of violations or system misuse.

Effective Date: 08/01/2016

4.10 Auditing: Monitoring, and Violations

Policy: The HMIS System Administrator will monitor access to all systems that could potentially reveal a violation of information security protocols.

Violations will be reviewed for appropriate disciplinary action that could include termination of employment or criminal prosecution.

All exceptions to these standards are to be requested in writing by the Executive Director of the Participating Agency and approved by the HMIS System Administrator as appropriate.

Monitoring shall occur as follows:
- Monitoring compliance is the responsibility of the HMIS System Administrator
- All users and custodians are obligated to report suspected instances of noncompliance
- Monitoring shall occur yearly and focus on CNY HMIS usage and adherence to The CNY HMIS Policies and Procedures.

Violations are as follows:
- The HMIS System Administrator will review standards violations and require or recommend the agency through corrective and disciplinary actions
- Users should report security violations to the Agency Administrator, and the Agency Administrator will report to the HMIS Program Coordinator or the HMIS System Administrator
- Should there be a violation by the Agency Administrator, end users may report directly to the HMIS System Administrator

Effective Date: 08/01/2016

4.11 Local Data Storage

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

Participating Agencies shall develop policies for the manipulation, custody, and transmission of client-identified data sets. A Participating Agency will develop policies consistent with Information Security Policy outlined in this document regarding client-identifying information stored on local computers.

Effective Date: 08/01/2016

4.12 Transmission of Client Level Data

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

Administrators of the Central Server data must be aware of access-control vulnerabilities for that data while they are in transmission within the network. Transmission will be secured by 128-bit encryption provided by Secure Socket License (SSL) Certificate protection, which is loaded at the CNY HMIS server, located in Shreveport, Louisiana.

Effective Date: 08/01/2016

Section Five:
Technical Support and System Availability

5.1 Planned Technical Support

Policy: The HMIS System Administrator shall offer technical support to all Participating Agencies on use of CNY HMIS.

The HMIS System Administrator will assist agencies in:
- Start-up and implementation
- On-going technical assistance
- Training
- Technical assistance with report writing and any other additional modules

Effective Date: 08/01/2016

5.2 Participating Agency Service Request

Policy: The HMIS System Administrator shall respond to requests for services.

All service requests will arrive from the Agency's Executive Director or the Agency Administrator. HHC will respond to service requests, however, The HMIS System Administrator will require that proper communication channels (phone, fax, or e-mail) be established and used at all times. To initiate a service request from a Participating Agency:

- Agency Management Staff (Executive Director or Agency Administrator) contact assigned The HMIS System Administrator for service
- The HMIS System Administrator will determine resources needed for service
- The HMIS System Administrator will be available to the community of users in a manner consistent with the user's reasonable service request requirements. The HMIS System Administrator are available for Technical Assistance, questions, and troubleshooting generally between the hours of 8:00 a.m. to 4:00 p.m. Monday through Friday, excluding state and federal holidays
- HHC contacts agency management staff to work out a mutually convenient service schedule

Chain of communication:

HMIS Administrator
↓   ↑
Agency Management Staff (Executive Director or Agency Administrator)
↓   ↑
Agency Staff

Effective Date: 08/01/2016

5.3 Hours of System Operation

Policy: System shall be accessible 24 hours a day 7 days a week.

The system will be available to the community of users in a manner consistent with the user's reasonable usage requirements. CNY HMIS has regularly scheduled maintenance on Wednesdays from 10:00 p.m. to 11:00 p.m.; CNY HMIS will be inaccessible during that time.

Effective Date: 08/01/2016

5.4 Planned Interruption to Service

Policy: The HMIS System Administrator shall inform Participating Agencies of any planned interruption to service.

Participating Agencies will be notified of planned interruption to service one (1) week prior to the interruption. The HMIS System Administrator will notify Participating Agencies via e-mail the schedule for the interruption to service. An explanation of the need for the interruption will be provided and expected benefits or consequences articulated. The HMIS System Administrator will notify via e-mail that service has resumed. CNY HMIS has regularly scheduled maintenance and HMIS will be inaccessible during that time.

Effective Date: 08/01/2016

5.5 Unplanned Interruption to Service

Policy: HHC of CNY shall notify each Participating Agency of unplanned interruption to service in a timely manner.

Participating Agencies may not be notified in advance of unplanned interruption to service. Participating Agencies will be notified of unforeseen interruption to service that are expected to exceed two (2) hours. When an event occurs that makes the system inaccessible The HMIS System Administrator and Bowman Internet Systems, LLC will make a determination to switch service to the secondary server. At this point, users will be able to resume operation. The procedure will be as follows:

- Event is detected
- Analyzed
- Repair the problem within two (2) hours or switch to secondary server
- Resume operation at Participating Agency
- Production server becomes available
- During the next full backup process, production server will be restored with latest data from secondary server
- The HMIS System Administrator will notify via e-mail that service has resumed
- Return to normal operation

Effective Date: 08/01/2016

Section Six:
Data Release Protocols

6.1 Data Release Authorization and Distribution

Policy: The Clients own all data input into the system by Participating Agencies.

The Participating Agency will follow CNY HMIS for the release of all data. Participating Agencies will abide by Access to Data Policies as established by this document. Agencies shall only use data for internal use and for required reporting to funders. Any data released will conform to the following:
- Requests for release of data must be submitted to The HMIS System Administrator, and the request can only be for data that your agency had provided to CNY HMIS
- Request for data release must be submitted in writing via e-mail, fax, or mail to the HMIS Agency Administrator
- Only de-identified aggregate data (that is data devoid of Names, Social Security Numbers, and Dates of Birth) will be released
- Client Level Personal Protected Information (Names, Social Security Numbers, and Dates of Birth) and whereabouts will only be released if it is required by state or local law; necessary to avert serious threat to health or safety; to report victims of abuse or neglect; and for law enforcement purposes only in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial office or a grand jury subpoena

Effective Date: 08/01/2016

6.2 Client Audit and Deletion Request

Policy: The Client has the right to request an audit log of what user(s) has viewed, edited, or deleted information and also the right to remove their personal information at any time.

The client shall make a Client Audit and Deletion Request in writing, via mail, fax or e-mail, using Attachment X: Client Audit and Deletion Request Form. The form will be sent to the HMIS System Administrator. The Client shall receive an audit report by mail no longer than fourteen (14) days after the receipt of the request. The client can also request that their client record and all personal identifying information be removed from CNY HMIS with the Client Audit and Deletion Request Form (Attachment XII).

Effective Date: 08/01/2016

6.3 Right to Deny Access to Client Identifying Information

Policy: The HMIS System Administrator retains authority to deny access to all client identifying information contained within the system.

No data will be released to any person, agency, or organization that is not the owner of said data. The procedure is as follows: Any request for client identifying data from any person, agency, or organization other than the owner will be forwarded to the HMIS System Administrator, to determine whether a release is appropriate.

Effective Date: 08/01/2016

Section Seven:
Data Quality Controls

7.1 Client Naming Convention

Policy: Users shall use the following naming conventions for the input of all clients.

For the input of any client information the following naming conventions must be followed. The naming conventions are taken straight from Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice. The standard naming conventions will be monitored by a monthly error report sent to the user and their Agency Administrator. The standard naming convention will allow for an improved searching capability and an enhanced de-duplication process for accurate reporting.

Client Naming Standard includes:

- Input the first name in the first name field and the last name in the last name field. Be certain that the correct name is in the correct field
- Client names must be entered in Title Case, not in all caps or all lower case. The following format should be used: Brian T McMahon (errors include brian t mcmahon, BRIAN T MCMAHON, and any other form not in Title Case)
- The suffix field shall only contain suffixes such as Jr., Sr., III, IV, V, etc. The suffix field shall not contain prefixes (Miss, Ms., Mrs., and Mr.) or suffixes not in the aforementioned format
- Clients with more than one last name shall be hyphenated. This standard requires that last names to be hyphenated such as Jones-Smith or Lee-Malloy
- The use of non-identifying first or last names shall not be permitted. This standard does not allow for clients to be named Child, Wife, Husband, or Unknown. The use of the clients' proper name shall be used
- The alias or alternate name rule will allow for users to create names that are searchable beyond the proper first and last name. This rule allows users to insert an alias or common client name (that is not the client's proper name) in the first or last name fields in "quotes". If a name is in quotes a user should be aware that the client may also go by either the proper name or the quoted name. For instance William Jones may introduce himself as Bill Jones, in which case the first name field would contain William "Bill" and the last name field would contain Jones. This rule is not limited to one quoted entry per first or last name field
- Clients who identify their gender as "Transgender" and who have not legally changed their name to their preferred name, staff will place their preferred name in the "Alias" section of the client demographics.

Effective Date: 08/01/2016

Section Eight:
Attachments

Attachment I

List of HMIS Agencies

1. **Catholic Charities Onondaga**
2. **Chadwick Residence**
3. **CNY Services**
4. **Contact Community Services**
5. **Onondaga County**
6. **City of Syracuse**
7. **Hiscock Legal Aid Society**
8. **Legal Aid Society of Mid-New York Inc.**
9. **Liberty Resources**
10. **Onondaga Case Management**
11. **Rescue Mission**
12. **Spanish Action League**
13. **Syracuse Housing Authority**
14. **Syracuse Behavioral Health**
15. **The Salvation Army**
16. **Veterans Administration**
17. **YMCA**
18. **YWCA**
19. **Syracuse Housing Tenants Association**
20. **Northeast Community Center**
21. **Samaritan Center**
22. **In My Father's Kitchen**
23. **Greater Syracuse Tenants Network**
24. **Visions for Change**
25. **Office of Temporary and Disability Assistance**
26. **ACR Health**
27. **St. Joseph's Hospital Health Homes**
28. **Volunteer Lawyers Project**
29. **Oswego County**
30. **Oswego County Opportunities Inc.**
31. **Oswego Catholic Charities**
32. **Cayuga County**
33. **Arise Inc., Cayuga County**
34. **Cayuga/Seneca Community Action**
35. **Chapel House Homeless Shelter**
36. **Rescue Mission, Cayuga County**