

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



The Housing & Homeless Coalition of Central New York

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*Effective: October 1, 2009
Revised: July 13, 2018*

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attached

Introduction:

The Housing and Homeless Coalition of Central New York (HHC), through a United States Department of Housing and Urban Development (HUD) contract supported by the Continuum of Care (CoC) NY-505 with United Way of Central New York (UWCNY) as the CoC Collaborative Applicant and HMIS Lead, 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 CoC to capture information about the clients that they serve. The HMIS 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 CoC 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 CoC. 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 CoC 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 can use on-line resource information and project 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 HUD and the State of New York. The software has the capability to generate required reports including the HUD Annual Performance Report (APR), Emergency Services Grant (ESG) Monthly Statistical Report, RHYMIS, SSVF, PATH, 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 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 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:

Mediware Information Systems Inc.

- HMIS Vendor who has developed the software ServicePoint.
- House the HMIS database central server and limits Provider Agencies access to the HMIS database.
- Located at 333 Texas Street, Suite 300, Shreveport, Louisiana 71101.

ServicePoint:

- Name of the software that was developed by Mediware Information Systems Inc. for our HMIS.

HMIS Lead Agency:

- The United Way of Central New York
- The agency responsible for overseeing the HMIS implementation, reporting, and funding.

HMIS Staff:

- HMIS Administrator - responsible for the implementation, training and technical assistance and reporting functions for the CoC (Continuum of Care – NY 505) as well as the oversight of CNY HMIS, compliance with internet confidentiality and privacy policies
- Data and Systems Assistant – responsible for New User training, is the initial contact for technical assistance for Agency Administrators, assists the HMIS Administrator with CoC and local reporting, and assist with maintaining data quality throughout HMIS.

HMIS Data Administrator Committee makes recommendations to the CoC; otherwise known as the HHC, who have the final decision for all Policies and Procedures regarding CNY HMIS.

Agency Staff:

- Participating Agency - 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 - responsible for all agency staff that has access to CNY HMIS.
- Agency Administrator - responsible for the administration of the software for his/her agency.
- End User - 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 HUD CoC and ESG 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 Administrator.

The CNY HMIS license costs will be covered for agencies funded through CoC and 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 CoC or ESG.

CNY HMIS License Allocation Priorities:

1. CoC funded
2. ESG funded
3. RHY HHS funded
4. SSVF funded
5. Emergency Shelter/Department of Social Services funded
6. HOPWA Funded
7. OTDA (Office of Temporary Disabilities Association) funded
8. Non-mandated participating agency (privately funded, etc.)

*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 \$441 the first year, and \$237 a year after that. Each license purchase will be prorated based upon the grant funding year, which is July 1st to June 30th.

1.2 CNY HMIS Governing Structure and Management

Policy: The HMIS Administrator of the HHC shall manage the structure that supports CNY HMIS and shall make final policy decisions with input from the HHC Data Administrators Committee and the HUD Selection/ Performance Evaluation Committee.

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

- HHC HMIS Administrator
- HHC Director
- HHC Data and Systems Assistant

The CNY HMIS management structure will adequately support the operations of the HMIS according to the Guiding Principles described in the Introduction. The HMIS

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 is responsible for the overall direction and ongoing oversight of CNY HMIS operations and usage of the software ServicePoint (Mediware as the HMIS vendor); the CoC has assigned UWCNY as the designated HMIS lead agency and 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 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 Board. The following Committees will have roles in the administration and evaluation of HMIS:

- The CNY HMIS Data Administrators Committee will organize, oversee, and compile counts of the population and subpopulations of people experiencing homelessness. They will help plan, organize, promote, and carry out the Point-In-Time (PIT) Count. The committee will review all HMIS reports including Housing Inventory Count (HIC), Longitudinal Specification Analysis (LSA), and System Performance Measures (SysPM). The Data Administrators will meet every other month and will consist of at least one agency representative from each of the agencies that are submitting data as well as the Collaborative Applicant and any other interested agency that has data reporting requirements to the CoC.
- The HUD Selection/ Performance Evaluation Committee will conduct HMIS user Evaluations including evaluating completeness and determining whether a new applicant (Project/ Agency) should receive HMIS access/ license.
- The Program/Advocacy Planning Committee will be responsible for evaluating HMIS Data outcomes to determine goals for the community. The reports that will be used for this assessment are Point-In-Time Count (PIT), Housing Inventory Count (HIC), Longitudinal Specification Analysis (LSA), and System Performance Measures (SysPM).
- The Policy and Procedure Manual will be updated annually by the Governance/Policies Committee and revisions will be made as required by HUD HMIS Standards or changes to the current functioning of CNY HMIS.

1.3 Data Analysis

Policy: The HMIS 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 the CoC such as PIT, HIC, LSA, and SysPM.

1.4 System Administration, Security, and User Accounts:

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

The HMIS Lead Agency has a contract with Mediware Information Systems, LLC (ServicePoint) to host the central server (located in Shreveport, Louisiana). They will have overall responsibility for the security of the system. See Appendix III: Mediware Information Systems, LLC Disaster Recovery Options for a full policy review.

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

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. (If the Executive Director chooses to identify another Director Level staff person to handle these responsibilities it must designate that in a separate agency policy and let the HMIS Administrator aware of whom that person should be)

The Executive Director/Designated 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. Executive Director/Designated Director holds final responsibility for the adherence of his or her agency's personnel to the CNY HMIS Policies and Procedures outlined in this document. The Participating Agency's Executive Director/Designated Director is responsible for all activity associated with agency staff access and use of the ServicePoint software. The Executive Director/Designated Director shall establish and monitor agency procedures that meet the criteria for access to ServicePoint software, as detailed in the policies outlined in this document. The Executive Director/Designated 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/Designated Director agrees to limit access to the ServicePoint software 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/Designated 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

1.6 Agency Administrator

Policy: Every Participating Agency must designate at least one person to be the Agency Administrator. (Larger agencies may want 2 or more)

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 ServicePoint software system including review of the policies in this document and any agency policies which impact the security and integrity of client information
- Ensuring that access to the ServicePoint software is 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
 - a. Administering agency-specified business and data protection controls
 - b. Administering and monitoring access control
 - c. Detecting and responding to violations of the Policies and Procedures or agency procedures
- Review HUD Data Quality Report Framework sent to you by the HMIS Administrator and correct all data errors in a timely manner
- Let the HMIS Administrator know if you have a program that is missing from a reporting list.
- Run the HUD Data Quality Report Framework in ART to check client data at least on a Quarterly basis, unless funding source requires different.
- Notify the HMIS Administrator of data quality errors that you can't correct or that are uncorrected by other Agency Administrators.
- Accurately assess your End-Users ability to do data entry in an accurate and timely manner to determine if further training/refresher training is required.
- Run quarterly Audit Reports on all active End-Users and report any violations of an end user to the Agency Executive Director and the HMIS Administrator.

1.7 User

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

All individuals at the HHC 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 Administrator agrees to authorize use of the ServicePoint software 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 ServicePoint software 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 ServicePoint 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. 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 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.

Section Two: Participation Requirements

2.1 Participation Requirements

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

These requirements include, but are not limited to:

- Project serves individuals or families who are primarily homeless or at risk of homelessness. This includes housing projects that provide Emergency Shelter, Transitional Housing, Rapid Rehousing, and Permanent Housing. It also includes Service Only projects that provide Case Management, Street Outreach, and Homeless Prevention.
- Is a registered 501(c) (3) agency and abides by all regulations to maintain their status. (See IRS Exemption Requirements for 501(c) (3) Organizations).
- Is a governmentally run Agency/Organization that directly interacts with or provides services to homeless individuals or families (i.e.: hospitals, schools, jails/prisons, etc.) that will be assisting in the CoC's 10-year plan to end homelessness.

The HHC will work to ensure that all Participating Agencies receive the benefits of the system while complying with all stated policies. This includes guidance on federal, state, and local regulations around serving our homeless population, best practices, training, and any other support that the HHC can provide.

Guidance for HMIS Implementation for new Agencies/Projects would include the following steps:

1. Verification of Agencies status; 501(c)(3)
2. Provision and explanation of the HMIS Policy and Procedures, Coordinated Entry, Housing First, 10 Year Plan, and requirements of participation of the CoC.
3. Site visit by the HHC Director and staff
4. Review of the agencies Policy and Procedure Manual to ensure compliance with Federal, state, and local regulations; especially in regard to HIPAA and Confidentiality.

*This decision is voted on by the HMIS Administrator Committee, but then it is approved by the HUD Selection/ Evaluation Committee.

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 CNY HMIS.

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.
- 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)

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 Administrator prior to using the system
- **Data Security Policy** - The HMIS Administrator 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 Administrator 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 CNY HMIS 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 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.
- **Security Assessment** - Upon completion of a security assessment, each agency must agree to abide by all policies set forth in this CNY HMIS Policies and Procedures document. The Executive Director or other designated equivalent level staff will be responsible for signing the Agency Participation Agreement (Attachment I).
- **Admin Providers** - ServicePoint 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 ServicePoint. 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 **7 days (1 week)** 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 ShelterPoint. 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 Administrator Committee has officially exempted them.

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 Privacy Policy within the agency and provide any client that requests more information with the CNY HMIS Privacy Policy clients will be notified of the following information:

- **Description of ServicePoint:** 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 HMISs across New York State. This 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

2.6 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 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
- Project Start Date
- Project Exit Date
- Destination
- Relationship to Head of Household
- Client Location
- Housing Move-in Date
- Living Situation

2.7 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 CoC, ESG, 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 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:

- Income and Sources
- Non-Cash Benefits

- Health Insurance
- Physical Disability
- Developmental Disability
- Chronic Health Condition
- HIV/AIDS
- Mental Health Problem
- Substance Abuse
- Domestic Violence
- Contact
- Date of Engagement
- Bed-Night Date
- Housing Assessment Disposition

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

- Services Provided – PATH Funded
- Referrals Provided - PATH
- PATH Status
- Connection with SOAR

HHS-RHY Only Required Elements

- Referral Source
- RHY-BCP Status
- Sexual Orientation
- Last Grade Completed
- School Status
- Employment Status
- General Health Status
- Dental Health Status
- Mental Health Status
- Pregnancy Status
- Formerly a Ward of Child Welfare/Foster Care Agency
- Formerly a Ward of Juvenile Justice System
- Family Critical Issues
- RHY Service Connections
- Commercial Sexual Exploitation/Trafficking
- Labor Exploitation/Trafficking
- Project Completion Status
- Counseling
- Safe and Appropriate Exit
- Aftercare Plans

HUD-HOPWA Required Elements

- Services Provided – HOPWA
- Financial Assistance– HOPWA
- Medical Assistance

- T-cell (CD4) and Viral Load
- Housing Assessment at Exit

HUD-RHSAP Required Elements

- Worst Housing Situation

VA-SSVF Required Elements

- Veteran’s Information
- Services Provide - SSVF
- Financial Assistance –SSVF
- Percent of AMI (SSVF Eligibility)
- Last Permanent Address
- VAMC Station Number
- SSVF HP Targeting Criteria
- HUD VASH Voucher Tracking
- HUD VASH Exit Information
- Employment Status

Some of the Veteran’s Administration Programs also use these other federal partner elements:

- Connection with SOAR
- Last Grade Completed
- General Health Status

2.8 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

2.9 Data Quality Plan

Policy: Each participating agency is required to sign and actively participate in our HMIS Data Quality Plan

Data Quality Plan consists of, but is not limited to the following obligations:

- Running the HUD Data Quality Framework Report quarterly; best practice is monthly.
- Fixing all data quality errors to have less than 5% error rate
- Running your program APR, CAPER, and any other funding required report quarterly and fixing any data errors

See Attachment XII

2.10: Coordinated Entry

All agencies that provide a service of Street Outreach, Emergency Shelter, Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing will follow the HHC's Coordinated Entry Policy to house the most vulnerable individuals and families. Street Outreach and Emergency Shelter providers will be responsible for sending all referrals for Coordinated Entry via HMIS to the Coordinated Entry NY-505 Provider of the county desired by the client. There are three coordinated entry providers in the CoC which cover the following areas:

- **Coordinated Entry NY-505:** This is the parent provider for all CE referrals in our CoC and is the provider designated for all CE referrals to be housed in Onondaga County area.
- **Coordinated Entry NY-505 Cayuga:** This provider is for all CE referrals that are to be housed in the Cayuga County area.
- **Coordinated Entry NY-505 Oswego:** This provider is for all CE referrals that are to be housed in the Oswego County area.

***CoC and ESG funded programs are required to send and receive CE referrals via HMIS and all other programs are strongly encouraged to in order to ensure the most vulnerable are housed first in order to coordinate with the HHC's 10-year plan to end homelessness.**

See Attachment XIV

2.11 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 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.

2.12 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 Administrator is 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 Administrator is available to consult on appropriate processes for disposal of electronic client level data.

Section Three: Training

3.1 Training Schedule

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

The HMIS Administrator will maintain an ongoing training schedule for Participating Agencies. The HMIS 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 (which includes the security 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:

- Any program scores above a 5% error rate for any data elements on the Data Quality Report Framework for 2 consecutive quarters.
- Any major updates in CNY HMIS occur.

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 Administrator will provide data security training to ensure that staff is properly trained and knowledgeable of CNY HMIS Policies and Procedures.

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

The HMIS Administrator is responsible for training all new users. Users **must** receive ServicePoint training prior to being granted user privileges for the system.

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:

- Requests for HMIS access will be made to the HMIS Administrator, voted on by the HMIS Administrator Committee, but then it is approved by the HUD Selection/ Evaluation Committee.
- User access and user access levels will be deemed by the Executive Director/Designated Director of the Participating Agency in consultation with the Agency Administrator. The System Administrator will generate username and passwords within the administrative function of ServicePoint.
- The HMIS Administrator will create all usernames. If a conflict exists beyond this naming convention, the HMIS 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 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 the HHC. The Agency Administrator must update the access list and signed agreement on a quarterly basis.
- All new users must be submitted to the HHC before they can gain access to the system. All users that leave must be inactivated in the system within one (1) business day. The HHC shall have the only access to delete users.

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 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 ServicePoint system. 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.

Access Levels are as follows:

- System Administrator I & II
- Agency Administrator
- Case Manager II
- Read Only I, II, & III

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.

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 ServicePoint 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.
- **Data Sharing for Care Coordination:** Non-HMIS Participating Agencies can request and sign a Data Sharing Agreement regarding their participation in care coordination workgroups around vulnerable populations. These workgroups include Veteran Taskforce, Chronic Taskforce, Street Outreach, as well as any other workgroup that is established by the Continuum of Care (CoC).

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.

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 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

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 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 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

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 discretion of the HUD Selection/ Performance Evaluation Committee.

4.9 Data Access Control

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

Agency Administrators at Participating Agencies and The HMIS Administrator will regularly review user access privileges and remove identification codes and passwords from their systems when users no longer require access. HMIS Administrator will run the User Login Report monthly to determine if there are inactive users. Agency Administrators at Participating Agencies and The HMIS Administrator must implement discretionary access controls to limit access to CNY HMIS information when available and technically feasible. Participating Agencies and The HMIS Administrator must audit all unauthorized accesses and attempts to access CNY HMIS information. Participating Agencies and The HMIS Administrator also must audit all accesses and attempts to access CNY HMIS. Agency Administrators will run these audit reports at least quarterly for all active users. HMIS Administrator will run quarterly audits on all Agency Administrators. Agency Administrators and The HMIS Administrator will regularly review the audit records for evidence of violations or system misuse. All instances of violations will be reported the HMIS Administrator and the Executive Director of the Agency within 24 hours of detection. Each agency will follow their agencies policy around disciplinary action that is needed. The HMIS Administrator will for the HMIS Policy around violations listed below in 4.10.

4.10 Auditing: Monitoring and Violations

Policy: The HMIS 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/ Designated Director of the Participating Agency and approved by the HMIS Administrator as appropriate.

Monitoring shall occur as follows:

- Monitoring compliance is the responsibility of the HMIS 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. (Add quarterly audits from System Admin and Agency Admin)

Violations are as follows:

- The HMIS 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 Administrator.
- Should there be a violation by the Agency Administrator, end users may report directly to the HMIS Administrator.

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.

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.

Section Five: Technical Support and System Availability

5.1 Planned Technical Support

Policy: The HMIS Administrator and Data and Systems Assistant will offer technical support to all Participating Agencies on use of CNY HMIS.

The HMIS Administrator will assist agencies in:

- Start-up and implementation
- On-going technical assistance
- Administrator and Report Training
- Technical assistance with report writing and any other additional modules
- Data requests and analysis
- Client and User Audits

The Data and Systems Assistant will assist agencies in:

- Data Quality issues
- On-going technical assistance (password resetting, etc.)
- New User and Refresher Training
- Technical assistance with report writing and any other additional modules

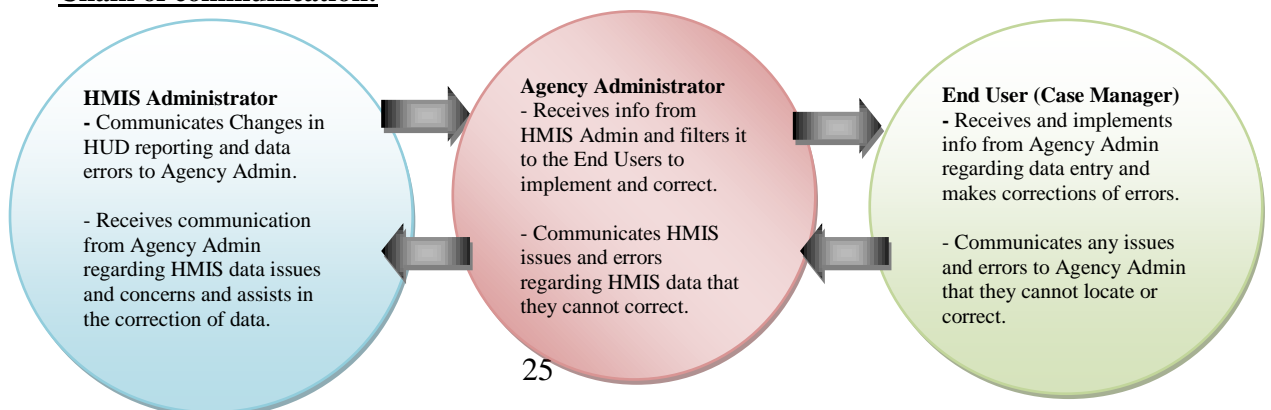
5.2 Participating Agency Service Request

Policy: The HMIS 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 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 Administrator for service
- The HMIS Administrator will determine resources needed for service
- The HMIS Administrator will be available to the community of users in a manner consistent with the user's reasonable service request requirements. The HMIS 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:



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.

5.4 Planned Interruption to Service

Policy: The HMIS 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 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 Administrator will notify via e-mail that service has resumed. CNY HMIS has regularly scheduled maintenance and HMIS will be inaccessible during that time.

5.5 Unplanned Interruption to Service

Policy: The HMIS Administrator 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 Administrator and Medware Information 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 Administrator will notify via e-mail that service has resumed
- Return to normal operation

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 client specific data must be submitted to The HMIS Administrator, and the request can only be for clients that are receiving services from that particular Project/Agency. The data will be released with the proper consent forms signed by the client.
- Request for aggregate data release must be submitted in writing via e-mail, fax, or mail using the Data Request Form (Attachment X) to the HMIS Agency Administrator and staff. All Data Request forms are subject to approval via the HMIS Administrator and/or HHC Director.
- 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.
- Participation of the CoC in Data Warehousing or Research activities will go through the HHC Staff, and if needed, the HHC Advisory Board for approval. The NY Stats Office of Temporary Disability Assistance (OTDA) requires all STEHP Providers to participate in the NYS data warehouse, and the CoC has agreed to share all data within our CoC for purposes of homeless service/population assessment. Any client who has not consented to share their data (signed the HMIS ROI) is left out of any data export.

6.2 Client Audit 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 Request in writing, via mail, fax or e-mail, using Attachment X: Client Audit Request Form. The form will be sent to the HMIS 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 locked to all HMIS Projects/staff to the HMIS Administrator in writing through any one of the participating agencies. Only projects that will have access to the information will be those projects that inputted the data, no cross-system sharing will occur.

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.

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. CirCare Inc.**
- 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. Auburn Housing Authority**
- 33. Cayuga County**
- 34. Cayuga/Seneca Community Action Agency**
- 35. Chapel House Homeless Shelter**
- 36. Auburn Rescue Mission**
- 37. Jamesville Correctional Facility**
- 38. Onondaga County Justice Center**
- 39. Last House on the Block**



www.hhccny.org
housingandhomelesscoalition@gmail.com
@hhcofcny facebook.com/hhccny
315-428-2216

Data Quality Plan

Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC NY-505

March 4, 2010
Revised July 25, 2018

Developed by:
HMIS Data Administrators Committee

Data Quality Standards Authorization Memorandum

I have carefully assessed the Data Quality Standards for the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC).

As authorized representatives of the CoC and the Homeless Management Information System (HMIS), we accept the Data Quality Standards as reasonable expectations for data entry and management regarding the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC's designated HMIS. Based on our authority and judgment, the adoption of this Standard and its inclusion in the CoC's policies and procedures is authorized.

NAME
HMIS Administrator

DATE

NAME
HMIS Lead Agency Director

DATE

NAME
HHC Advisory Board Chair

DATE

**Data Quality Standards
Authorization Memorandum – CoC Membership**

I have carefully assessed the Data Quality Standards for the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC).

I accept the Standards as reasonable expectations for data entry and management regarding the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC's designated Homeless Management Information System (HMIS), and support the adoption of this Standard.

NY-505 Participating Agency

Agency Representative (Print Name)

Representative's Title

Signature

Date

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GENERAL INFORMATION

1.1 Purpose

The purpose of this Data Quality Standard is to standardize expectations and provide guidance to HMIS participating programs on the extent and quality of data entered into Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC) Homeless Management Information System (HMIS).

1.2 Development Process

The CoC HMIS Data Quality Standards were developed through a collaborative effort across homeless service providers and spearheaded by the HMIS Agency Administrators Committee.

1.3 Definition of Data Quality

HMIS data quality refers to the extent that data recorded in the CNY HMIS accurately reflects the same information in the real world. A perfect overlap between data and reality would result in a hypothetical data quality rating of 100%, while a data quality rating of 0% would indicate that there is no match between the information entered into an HMIS and the same information in the real world. No data collection system has a quality rating of 100%. However, to meet the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC's goal of presenting accurate and consistent information on homelessness, it is critical that the HMIS have the best possible representation of reality as it relates to homeless people and the programs that serve them. Specifically, the goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact of homeless services.

1.4 Goals of the Data Quality Plan

- Help ensure the availability of timely and accurate data for use in helping to prevent, reduce and ultimately end homelessness
- Catch problems early and increase the usability of data
- Prepare data for the CoC NOFA process
- Assist in the Coordinated Entry process
- Prepare for all required Federal Reports for our CoC
- Prepare for other community Level reporting requests

1.5 Homeless Management Information System (HMIS)

For the purposes of this document, HMIS means Mediware Information Systems, Inc. and ServicePoint software application and all modules, assessments, reporting capacities, standard or customized, contained therein.

1.6 Supporting and Legacy Systems

For the purposes of this document, all legacy and supporting systems are identified as non Mediware Information Systems, Inc. and ServicePoint systems that transfer information to the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC HMIS.

1.7 Key Documents

Key documents needed as supporting references to this document are listed below:

- Housing and Urban Development (HUD) Homeless Management Information System (HMIS) Data and Technical Standards, June 2016
- HUD Reauthorization Notice on VAWA (August 2013)
- HUD CoC Annual Performance Review (APR)
- HUD CoC Annual Homeless Assessment Report (AHAR)
- HUD CoC Notice of Funding Availability (NOFA)
- HUD Housing Inventory Count (HIC) and Point In Time Count (PIT)
- HUD System Performance Measure Reports (SysPM)

1.8 Definitions

1. **Client Record:** A client record in the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC HMIS is a compilation of data elements sufficient to meet the requirements of funding sources while acknowledging the feasibility limitations of data collection for some program types. The following are definitions of “client record” as applicable to program types:
 - a. **Outreach and support services programs:** For the purposes of outreach programs, the definition of a record is a compilation of data elements sufficient to document that a service transaction as occurred. For outreach programs, this can be an alias provided a service transaction is attached.
 - b. **Homeless Prevention Services:** Any project that provides rental assistance, utility assistance and supportive services directly related to the prevention of homelessness to eligible individuals and families who are in danger of eviction, foreclosure or homelessness or who are currently homeless.
 - c. **Emergency Shelters:** Any facility the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless
 - d. **Transitional Housing Programs:** A project that has its purpose facilitating the movement of homelessness individuals and families to permanent housing within a reasonable amount of time (usually 24 months).
 - e. **Rapid Rehousing Programs:** provides short- and/or medium-term rental assistance and housing relocation and stabilization services (financial assistance and service costs) designed to quickly move homeless individuals and families from emergency shelter or places not meant for human habitation into permanent housing.
 - f. **Permanent Housing Programs:** long-term, community-based housing that has supportive services for homeless individuals with disabilities.

1.9 Acronyms and Abbreviations

See attached sheet for Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC HMIS acronyms.

1.10 Roles and Responsibilities

1.10.1 HMIS Administrator

- Review the HUD Data Quality Report Framework for the CoC.
- If a provider has data quality issues, forward the report to the provider so they can fix their data.
- Assist the Agency Administrator with the correction of data quality errors/ issues.
- Provider further training/ refresher training to Agency Administrators and End Users when needed.
- Review the provider list for each report.
- If there are missing or incorrect providers on the list, confirm those with the program provider(s).

1.10.02 Agency Administrator Role

- Review HUD Data Quality Report Framework sent to you by the HMIS Administrator.
- If you have data quality issues, correct them in a timely manner
- Let the HMIS Administrator know if you have a program that is missing from a reporting list.
- Run the HUD Data Quality Report Framework in ART to check client data at least on a monthly basis.
- Notify the HMIS Administrator of data quality errors that you can't correct or that are uncorrected by other Agency Administrators.
- Accurately assess your End-Users ability to do data entry in an accurate and timely manner to determine if further training/ Refresher training is required.

11.10.03 End-User Role

- Review the HUD Data Quality Report Framework sent to you by your Agency Administrator
- Correct data quality issues in a timely manner
- At intake, gather the most complete and accurate information you can about each client and the services they need
- Attend all trainings required by HMIS staff, including refresher training if determined to be needed by the Agency Administrator

2.0 Data Quality Standards

The Data Quality Standard for Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC is split into seven (7) categories. The general standard outlined is applicable to all HMIS participating programs with following exceptions noted by specific program type. Unless otherwise noted, all participating programs, including those transferring data from legacy and supporting systems, are expected to achieve and maintain the general standard.

Note: Homeless Service Providers whose primary target population is victims of domestic violence are currently prohibited from disclosing personally identifying information in an HMIS.

2.1 Timeliness

The purpose of timeliness is to ensure access to data when it is needed – either proactively (for monitoring purposes, publishing information to increase awareness, or to meet reporting requirements) or reactively (in response to a request for information or to respond to inaccurate information).

General Standard:

1. All HMIS participating programs will ensure entry of data for new clients, services, and entry/exits for a month are completed within in one week of program entry/exit. This includes all Supportive Services, Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing Programs.
2. Permanent or Transitional Housing programs submitting XML or CSV files must do so once a quarter.

Exceptions:

1. Emergency Shelters: All HMIS Emergency Shelter participating programs will ensure daily entry of data for new clients, services, and entry/exits.
2. PATH Providers: All HMIS Emergency Shelter participating programs will ensure daily entry of data for new clients, services, and entry/exits.

2.2 Completeness

The purpose of completeness is to ensure sufficient data on clients, their demographic characteristics, and service use to facilitate confident reporting and analysis on the extent and characteristics of the homelessness including:

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

2.2.1 All Clients Served

The purpose of all clients served is to ensure that all clients that are being served by service providers within the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC are represented in the HMIS.

General Standard:

100% complete the first section of the profile

Exceptions:

1. Outreach Programs: Outreach programs are allowed to use an alias in the HMIS in lieu of client identifiable information. Outreach programs are allowed up to 10% of their client records to be identified with alias.
2. Agencies that have decided not to enter PSH programs in HMIS but will enter data into the AHAR.

2.2.2 Universal Data Elements

The purpose of the Universal Data Elements is to ensure that all homeless service providers in the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC are documenting the data elements necessary to produce a Continuum-wide unduplicated count of clients served, to provide accurate counts for various reporting requirements, including HUD CoC APR, AHAR, and SysPM report requirements, and to ensure that the CoC has sufficient client data to conduct basic analysis on the extent and characteristics of the populations they serve.

General Standard:

95% of all clients entered will have Universal Data Elements Complete

Exceptions:

None

2.2.2 Program Specific Data Elements

The purpose of the Program Specific Data Elements is to ensure that all Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC McKinney Vento recipients are documenting the data elements necessary to produce the CoC APR and to ensure that the CoC has sufficient client data to conduct analysis on the extent and characteristics of the populations they serve.

General Standard:

95% of all clients will have program specific data entered

Exceptions:

None

2.2.3 PATH Program Specific Data Elements [Or Other Programs]

General Standard:

95% of all Program Specific Data Elements will be completed

Exceptions:

None

2.2.4 Other Programs

General Standard:

- 95% of all clients entered will have Universal Data Elements Complete
- 95% of all clients will have program specific data entered (Entry/Exit minimum)

Exceptions:

None

2.3 Accuracy

The purpose of accuracy is to ensure that the data housed in the Syracuse/Onondaga, Auburn/Cayuga, and Oswego CoC HMIS is the best possible representation of reality as it relates to homeless people and the programs that serve them.

General Standard:

Agency Administrators will be responsible to report to the System Administrator any discrepancies in the data not correctable by their users.

Exceptions:

None

2.4 Consistency

The purpose of consistency is to ensure a common interpretation of questions, answers, and which fields need completion in the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC) Homeless Management Information System (HMIS).

General Standard:

All agencies will use the same tool for training staff, developed by the data administrators group

Exceptions:

None

2.5 Monitoring

The purpose of monitoring is to ensure that the standards on the extent and quality of data entered into the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC) Homeless Management Information System (HMIS) that have been agreed upon by the CoC and their homeless service providers are met to the greatest possible extent and that data quality issues are quickly identified and resolved. Agencies are monitored annually by the HHC staff and HMIS data is used to measure project performance and systematic performance.

General Standard:

Agency Administrators will be responsible to complete maintain the quality of their program at 95% or higher.

Exceptions:

None

2.6 Agreement

The purpose of agreement is to ensure that all participants in the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC) Homeless Management Information System (HMIS) are aware and have agreed to the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Data Quality Standards.

General Standard:

All providers agree to meet the above stated standards to the best of their ability and seek assistance when necessary for interpretation or support to improve data quality.

Exceptions:

None

3.0 Data Quality Standards Reports

- HUD Data Quality Report Framework
- APR Reports
- ESG CAPER

4.0 Quick Reference Guides for Required Data Elements

See attached: HMIS Data Standards Manual & HMIS Data Dictionary 2017 Update