

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



**The Housing & Homeless Coalition of Central New York  
580 South Salina Street  
Syracuse, NY 13202**

*Effective: October 1, 2010  
Revised: October 2025*

## Table of Contents

Introduction	4
Governing Principles	5
Definitions	6
<b>Section One: Contractual Requirements and Roles</b>	<b>6</b>
1.1 CNY HMIS Contract Requirements	6-7
1.2 CNY HMIS Governing Structure and Management	7-8
1.3 Data Analysis	8
1.4 System Administration, Security, and User Accounts	8
1.5 Agency Executive Director	8-9
1.6 Agency Administrator	9-10
1.7 User	10
<b>Section Two: Participation Requirements</b>	<b>10</b>
2.1 Participation Requirements	10-11
2.2 System Requirements	11
2.2.1 Implementation Connectivity	11
2.2.2 Maintenance of Onsite Computer Equipment	11-12
2.3 Participation Agreement Requirements	12
2.4 Implementation Requirements	12-13
2.5 Fee Policy	13
2.6 Confidentiality and Informed Consent	13-14
2.7 Minimum Data Elements	15
2.8 Program Specific Data Elements	15
2.9 Data Security Policy	15-16
2.10 Data Quality Plan	16
2.11 Coordinated Entry	16
2.14 Monitoring	16-17
2.15 Off Site/ Remote Use of HMIS	17
<b>Section Three: Training</b>	<b>17</b>
3.1 Training Schedule	17-18
3.2 User, Administrator, and Security Training	18
<b>Section Four: User, Location, Physical and Data Access</b>	<b>18</b>
4.1 Access Privileges to CNY HMIS	18-19
4.2 Access Levels for System Users	19
4.3 Location Access Privileges to System Server	19
4.4 Access to Data	19-20
4.5 Access to Client Paper Records	20
4.6 Physical Access Control	20-21
4.7 Unique Username and Password	21
4.8 Right to Deny User and Agency Access	22
4.9 Data Access Control	22-23
4.10 Local Data Storage	23
4.12 Transmission of Client Level Data	23
<b>Section Five: Technical Support and System Availability</b>	<b>23</b>
5.1 Planned Technical Support	23-24
5.2 Participating Agency Service Request	24

5.3 Hours of System Operation	24
5.4 Planned Interruption to Service	24-25
5.5 Unplanned Interruption to Service	25
<b>Section Six: Data Release Protocols</b>	<b>25</b>
6.1 Data Release Authorization and Distribution	25
6.2 Client Audit and Deletion Request	26
6.3 Client Care Coordination & Data Sharing	26
<b>Section Seven: Data Quality Controls</b>	<b>26-27</b>
7.1 Client Naming Convention	27
<b>Section Eight: Attachments</b>	<b>27+</b>
Attachment I: List of Participating agencies	attached
Attachment II: Agency Participation Agreement	attached
Attachment III: HMIS Licensing Fee Policy	attached
Attachment IV: Client Fact Sheet	attached
Attachment V: Client Consent Form	attached
Attachment VI: HMIS Data Quality Plan	attached
Attachment VII: Data Sharing Agreement/ Policy	attached
Attachment VIII: Data Security Policy Sample	attached
Attachment IX: Visibility Request Form	attached

**Introduction:**

The Housing and Homeless Coalition of Central New York (HHC), through the United States Department of Housing and Urban Development (HUD) contract supported by the Continuum of Care (CoC) NY-505 as the CoC Collaborative Applicant and HMIS Lead, administers the Central New York Homeless Management Information System (CNY HMIS), which includes the comparable HMIS database for all Victim Service Providers (VSP) and any other project that is governed by VAWA regulation and cannot enter data into CNY HMIS. This comparable database is called CNY COMP HMIS, which will also follow CNY HMIS policies and procedures included within this document. Any policies that exclude CNY COMP HMIS will be indicated. These projects utilize Internet-based technology to assist homeless services 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 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)

**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, edited or viewed 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 access to data or systems for which they are not authorized. Authorization of an End User is outlined by the current position the End User holds, along with the HMIS project provider access that is granted. 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:**

WellSky

- HMIS Vendor who has developed the software Community Services.
- 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.

Community Services:

- Name of the software that was developed by WellSky for our HMIS.

HMIS Lead Agency:

- The Housing and Homeless Coalition of Central New York
- The agency responsible for overseeing the HMIS implementation, reporting, and funding.

HMIS Staff:

- System Administrator - responsible for the implementation, training and technical assistance for all users, reporting functions for the COC (Continuum of Care – NY 505) which includes federal, state and local requirements, ensures compliance with internet confidentiality and privacy policies, and assist with maintaining data quality throughout HMIS.

HMIS Data Administrator Committee makes recommendations to the HHC Executive Board, 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 needs performance-based outcome measures.
- Agency Executive Director - responsible for all agency staff that have 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. To participate in CNY HMIS, all existing and new participating agencies must sign an Agency Participation Agreement (Attachment II) with the HMIS Administrator.

The CNY HMIS license costs will be covered for agencies who fall under the essential category based upon project type and funding. Non-essential licenses will be required to pay for the license cost for CNYHMIS operations. These costs are determined by the HMIS Vendor WellSky, Inc. Please see the HMIS Licensing Fee Policy (Attachment III).

CNY HMIS License Allocation Priorities:

1. CoC funded
2. ESG funded
3. RHY HHS funded
4. SSVF funded
5. Emergency Shelters, including those who are funded by LDSS or private funds.
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 the CNY HMIS Goals mentioned in the Agency Partnership Agreements. (See attached document)

\*\*The cost of a user license includes an initial purchase cost along with an annual operational fee. This fee can change annually and is prorated for the month the license is purchased in. Each license purchase will be prorated based upon the grant funding year, which is August 1<sup>st</sup> to July 31<sup>st</sup>.

## 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, Lived Experience Boards, and the HHC Executive Board.

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 Data Specialist

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 Community Services (WellSky as the HMIS vendor); the CoC has assigned HHCCNY 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 generate required reports

The HMIS Data Administrator Committee and the HHC Lived Experience Boards shall make initial recommendations for changes to all policies and procedures by which CNY HMIS is governed and shall receive final approval from The HHC Executive Committee. The following Committees will have roles in the administration and evaluation of HMIS:

- The CNY HMIS Data Administrators Committee will organize and oversee counts of the population and subpopulations of people experiencing homelessness. 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 HHC Executive Committee will conduct HMIS user evaluations including End User Ethics violations, evaluating completeness, and determining whether a new applicant (Project/ Agency) should receive HMIS access/ license. This excludes the CNY COMP HMIS database.
- 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 HMIS Data Administrator 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.
- Obtain data from other sources for analysis (victim service providers, health care organizations, probation, etc.)

### **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 WellSky (Community Services) to host the central server (located in Shreveport, Louisiana). They will have overall responsibility for the security of the system.

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. Agency Administrators are responsible for monitoring user logins for their agency users on at least a quarterly basis or as needed. All Agencies must have a policy for these audits and keep a record of the completion of all quarterly audit reports. This policy must include the verification of audit completion to be sent to HMIS Administrator via email. Suspicious log-in activity should be reported to the HMIS administrator immediately for further inquiry.

## 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 for the identified agency this must be communicated in writing in the agency's MOU and to the HMIS Administrator directly.

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 Community Services software. The Executive Director/Designated Director shall establish and monitor agency procedures that meet the criteria for access to Community Services 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 HMIS Ethics Policy 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 Community Services 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 HMIS Ethics Policy. 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 HMIS Ethics Policy 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 Community Services 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 Community Services 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 the 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 Framework report or other data quality report 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 Quality Framework report in the Reports module, Data Completeness Report in SAP Business, or other data quality report 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 Community Services 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 Community Services 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 Community Services 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. Communication can be made in the form of e-mail, fax, or mail.

All users shall sign a HMIS Ethics Policy prior to obtaining access to CNY HMIS. The HMIS Ethics Policy shall be signed annually at the beginning of the HUD Reporting year, which is the month 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 regarding HIPAA and Confidentiality.

\*This decision is voted on by the HMIS Administrator Committee, but then it is approved by the HHC Executive 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.

### 2.2.1 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 the availability of Internet providers. Obtaining and

maintaining an Internet connection greater than 56K/v90 is the responsibility of the Participating Agency.

### **2.2.2 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.

### **2.3 Participation Agreement Requirements**

**Policy:** Each Participating Agency shall comply with Agreement Participation 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 IV) This does not include the CNY COMP HMIS database.
- Client Consent Forms must be signed by all clients to authorize the sharing of their personal information electronically with other Participating Agencies through the Service Point

software system. See Attachment IV: Client Consent Form. This does not apply to the CNY COMP HMIS database.

- Participation Agreements must be signed by Participating Agencies. See Attachment II.
- Agencies with essential project types are required to enter minimal data elements as defined by the Homeless Management Information Systems (HMIS), Data and Technical Standards Final Notice. Agencies with only Read-Only access are not required to provide data entry.

## 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 a 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 II).
- **Admin Providers** - Community Services 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 Community Services. 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 Shelters Module 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 Shelters Module These two processes are integral to timely and accurate reporting and shall be completed within twenty-four (24) hours of the beginning or end 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 Licensing Fees

**Policy:** Any project or license that is a non-essential HMIS project will be required to pay the costs of the license, as the cost determined by the vendor of HMIS, Wellsky. This includes a one-

time fee for the purchase of the license as well as the annual fee, which will be prorated for the purchase date within that fiscal year. All agencies who have non-essential licenses will enter into an MOU agreement for the cost of the licenses, and this is able to be renewed or edited each year between May 1<sup>st</sup> and June 30<sup>th</sup>. There is currently no requirement to charge for all essential licenses.

The CNY HMIS COMP database has a separate MOU and fee agreement for the cost of the separate database. The August to July annual schedule also exists for this contract, and it can be edited from May 1<sup>st</sup> to June 30<sup>th</sup> of each year.

## **See Attachment XII**

### **2.6 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 IV) to clients about the usage of CNY HMIS and CNY COMP HMIS. The CNY COMP HMIS database does not operate in an open forum and does not participate in any form of sharing identifying data. It is a locked system, so data cannot be visible to another agency or project provider. 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 with a Client Fact Sheet (Attachment IV) which explains that information will be entered into a computerized record keeping system (CNY HMIS). 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 HMIS:** 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 over the age of 18 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. This does not include the CNY COMP HMIS database.
- Verbal Consent Policy – In instances where a written consent cannot be obtained due to a variety of circumstances, such as COVID-19 restrictions, an agency can use the Verbal CNY HMIS Consent form. The form includes a written script for the HMIS user to use and it must be spoken as the script is written. If the client still does not understand what the consent form

is, the HMIS user can then go into further detail using the Client Fact Sheet. This does not include the CNY COMP HMIS database.

- **Visibility Request Form** - This form is used to adjust visibility settings within a client record to ensure a higher level of protection of current and historical data for safety concerns expressed by the client and/or agency staff. Visibility can be adjusted or locked down completely or to specific agencies or project providers.
- 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 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.

## 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 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

## **2.8 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 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 . The Program Specific Data Elements are required by the HUD Annual Progress Report (APR). The program specific data elements are located within the HMIS Data Standards Manual, which is updated by HUD annually. This manual is sent out to all Agency Administrators annually and is also located on the HHC website. All projects in HMIS are required to read and understand the data standards associated with their project and funding requirements for data entry.

## **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

## **2.10 Data Quality, Integrity and Performance Plan**

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

This 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
- Performance goals from a Federal, Local and Project Type level

**See Attachment V**

## **2.11 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 creating assessment records via HMIS in the Coordinated Entry NY-505 Provider. All projects that operate and enter data into the CNY COMP HMIS, or housing projects that take referrals from Victim Service Providers (VSP) off of Coordinated Entry will not enter any referrals into CNY HMIS, but follow the Coordinated Entry policy for Domestic Violence referrals that cover the VAWA regulations around privacy and confidentiality.

**\*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.**

## **2.14 HMIS Monitoring**

**Policy:** Housing and Homeless Coalition of Central NY will conduct HMIS monitoring for all HMIS participating projects.

All participating agencies will receive monitoring, regardless of funding source, between the months of October to December of every year. This monitoring will consist of the following:

- Data quality and integrity of all data entered within their initial time period.
  - Data Quality Report Framework
  - System Performance Measures (project type specific)
  - Funder required reports (APR, CAPER, PATH, etc.)
- On-site monitoring will occur **ONLY** for new projects or for any project that has a change in location/ site. This will consist of workstations, IT practices, policies and procedures.

Results of monitoring will be sent to the identified Agency Administrators/ agency staff with any recommendations, findings, and areas of strengths. When an agency has a finding, this means that there was a violation of an HMIS policy, and the agency will be responsible for sending an improvement plan with detailed action plan of how this violation will be corrected. A finding could be, but is not limited to, a missing policy that is required for HMIS operation, especially a policy that ensures data security and privacy practices. Recommendations will be made when there are areas of concern around performance or set up within the project. Areas of strength will also be discussed regarding the project's positive outcomes and abilities within HMIS.

Technical assistance will be offered to the project at this time, and the assistance can be surrounding any improvements the agency may need. This can be in reference to performance in an area, data quality and improvement, project set up, etc.

## **2.15 Off-Site/ Remote Use of HMIS**

All HMIS Users are prohibited from using a computer that is available to the public or from accessing the system from a public location through an internet connect that is not secured. For example, staff are not allowed to use Internet Cafes, Libraries, Airport Wi-Fi or other non-secure internet connections. The Agency Privacy Policy must have a plan for remote access if staff will be using HMIS outside of the office such as doing data entry from home. Concerns addressed in this plan should include the privacy surrounding the off-site entry.

- a) The computer and environment of entry must meet all the standards as defined above in section 2.9 Data Security Policy.
- b) Downloads to the off-site computer may not include client identifying information.
- c) The computer or tablet is not visible to other non-HMIS users where client level data can be seen.

## **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. Agencies are asked to RSVP for all training, and requests should be sent to the HMIS staff. Training will be offered at least twice a month.

There are two basic training curricula, Agency Administrator training and New User training (which includes data security training). The appropriate access level shall obtain the appropriate training. Agency Administrators are required to attend both courses. There are additional training topics that can be requested through the System Administrator to help support the users with what they need.

Agency Refresher Training will be required if the following happens:

- Any agency or project does not meet the outcomes and data quality requirements outlined in the HMIS Data Quality, Integrity and Performance Plan, or are very low performing in comparison to the average outcomes for the CoC on the HMIS Monitoring tool for 2 consecutive years or more.
- Any major updates in CNY HMIS occur.

### **3.2 User, Administrator, and Security Training**

**Policy:** Each CNY HMIS User must attend appropriate trainings.

All Agency staff who will need access to Community Services (HMIS System) must attend a New User Training. Users **must** receive Community Services training prior to being granted user privileges for the system and will not receive their login credentials for the live site until the New User Training is completed.

All Users will first watch a series of training videos of the appropriate project types that are required with their job responsibilities. These project types include Emergency Shelter, Transitional Housing, Rapid Rehousing, Permanent Housing, Street Outreach, Homelessness Prevention and Supportive Services Only. Each user's supervisor must sign off and verify that the new user completed the required series of training videos. Once the verification has been received the user and supervisor will be notified of scheduled training sessions or the user can schedule another time that is convenient for them.

All users must undergo security training before gaining access to the system. This training occurs during the New User Training process via video and in the live training session and includes a review of CNY HMIS Policies and Procedures.

All users will complete a pre-training and post-training data entry exercise, which will need to be completed within 30 days of the initial contact from the System Administrator. The user must have 100% of the data entry steps complete with 85% data accuracy/quality.

Agency Administrators must also attend Administrator training in addition to User training. These training courses are scheduled quarterly but can also be requested ahead of time if the Agency Administrator cannot attend the scheduled training.

When an active user changes roles, project types, or agencies within the system, they may be required to either attend a new user training or complete the training video verification for their end user responsibilities. This decision is up to the new supervising Agency Administrator to make.

## **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 Data Administrator Committee, and approved by the Executive Committee of the HHC Advisory Board.
- User access and user access levels will be deemed by the Executive Director/designated staff of the Participating Agency in consultation with the Agency Administrator. The System Administrator will generate username and passwords within the administrative function of Community Services.
- 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 and a character.
- Passwords expire every 45 days.
- The agency Administrator must attend 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 thirty (30) days or more, their password should be inactivated within five (5) business days of the start of their leave. The Agency Administrator is responsible for inactivating users of the system and informing the HHC.
- 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 staff are the only users who can remove/ delete a user from HMIS.

## 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 and deleted by the System Administrator under the direction of the Agency Administrator who directly supervises the user.

There are nine (5) levels of access to the Community Services 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
- Read Only II

## 4.3 Location Access Privileges to System Server

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

Only authorized computers, laptops and mobile devices will be able to access the system from authorized locations. Access to the system will only be allowed from electronic devices specifically identified by the Executive Director and Agency Administrator of the Participating Agency. Any electronic device used to access HMIS must also follow all safety and security protocols for use, i.e.: password protection, wi-fi usage, etc.

## 4.4 Access to Data

**Policy:** Participating Agencies shall enforce the user access privileges to system server. The user access privileges to the 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 Community Services software system which can restrict agencies from viewing each other's data.
- **Raw Data:** Users who have been granted access to the Community Services Report Writer tool can download and save client level data onto their local computer. Once this information has been downloaded from the Community Services 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 and Street Outreach, as well as any other workgroup that is established by the Continuum of Care (CoC). All agencies participating in that workgroup must sign the agreement for client level data to be openly shared. Agencies will share only data that is necessary to accomplish the task of obtaining permanent housing, which does not include disclosure of medical information, including details of diagnostic or medical care. Agency must also communicate this agreement with existing clients when the client is agreeing to services. This policy does not pertain to the CNY COMP HMIS database or any client data located within.

#### **4.5 Access to Client Paper Records**

**Policy:** Participating Agencies shall establish procedures to handle access to client paper records that are exported or printed from HMIS. These procedures will:

- Identify which staff have access to the client paper records and for what purpose. Staff should only have access to records of clients, who they work directly 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.

An agency is permitted to print off only information that was added to HMIS by that agency's users or project level providers, never from a different agency. If any agency wishes to obtain data within HMIS from another agency, they must follow the privacy laws regarding obtaining a written release from the client to obtain/use that data outside of HMIS.

#### **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, mobile devices, software, documentation and diskettes shall be secured proportionate to the threat and exposure to loss. Available precautions include equipment such as enclosures, lockable power switches, lockable screens, unsaved password access on mobile devices, 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 to log on 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 Administrator 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 secure written or verbal form. The system allows for password reset via the email address that is provided on the HMIS User License Request form.
- 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 log on 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 and mobile devices 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. If a mobile device is being used the password should never be saved on the device. A user must enter it manually every time.

#### **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 an agency or user of the system may result in the suspension or revocation of an agency’s access. The suspension or revocation process is as follows:

##### **User violations – Violation of release of personal identifying information (PII)**

- If a breach of PII in HMIS occurs, it must be reported directly to the HMIS Administrator. If the Provider Agency of the user involved in the infraction was not the source of the discovery, they will be notified. Any user found to be in violation of

Policies and Procedures will be initially sanctioned by a suspension of system privileges. This suspension may be temporary based upon the findings following a thorough investigation by the Provider Agency.

- The Provider Agency is then required to conduct an internal investigation surrounding the PII violation and make a determination to either reinstate the user's access or revoke it within 7-10 business days of the initial notification. If the agency request reinstatement, they must submit a corrective action plan outlining what steps will be taken to ensure this type of infraction does not occur again.
- If the HMIS Administrator does not agree with the reinstatement, the HHC Executive Board will then be notified of the infraction and will make a decision for reinstatement or have a final decision to revoke the user's access.
- The Executive Director or equivalent administrator of the participating agency can make an appeal against the revocation to the HMIS Administrator in writing within seven days. The HMIS Administrator will then notify the HHC Advisory Board for review. The HHC Advisory Board will at that point vote to overturn the sanction issued by the Executive Board or keep sanction as is.
- The HMIS Administrator will make every attempt to notify all clients involved in the infraction by mail within one week of the final decision. This notification will include the agency involved, the type of infraction, the details about the violation, and the final sanction issued by the HMIS Administrator. The clients will also be reminded of their right to a full audit of their HMIS record, along with their right to file a grievance with the Provider Agency, which will include the contact information for that agency. The client will also be offered a chance to share their feelings around this violation, and how they were impacted personally.
- CNY COMP HMIS is a closed system, so the viewing of unauthorized data does not occur, however there can be a disclosure of PII outside of the database. The organizations who govern those end users must follow data security practices within VAWA regulations surrounding the discloser of DV survivors PII.

**Agency Violation of HMIS Policies and Procedures** (Including HMIS Policy & Procedure Manual, Data Quality, Integrity and Performance Plan &/or Participating Agency Agreement)

- HMIS Administrator will contact agency regarding violations.
  - PII Violation - Agency will have 30 days to respond to HMIS Administrator
    - Agency must make a corrective action plan – objective measures
    - Agency will be on probationary period for 90 days.
    - Any agency that is found to have consistently and or flagrantly violated Policies and Procedures may have their access privileges suspended or revoked.
- No contact or response by agency in 30 days, HMIS Administrator will issue a letter to the Executive Director or designated staff.
- No contact or response by agency within 60 days of initial contact regarding violations the agency will be closed in HMIS, and license access terminated.
- If agency is an essential project, the funder will also be notified of violations.
- Any Agency that is removed for a violation can request access again, but they will need to follow the same procedures as new agencies listed in Section 4.1 above.
- The Executive Director of the participating agency can make an appeal against the HMIS Administrator's sanction in writing within seven days. The HMIS Administrator will then notify the Executive Committee of the HHC Advisory Board for review. The Executive Committee will at that point vote to overturn the sanction issued by the HMIS Administrator or keep sanction as is.

*\* Violations would include all aspects of the HMIS Policies, but specifically those around HMIS operations, data security, privacy practices, data quality and performance.*

#### **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 users that have not been active in the system for more than 90 days. The user and their supervising Agency Administrator will then be contacted to determine if the user needs to be removed from the system. 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. Agency Administrators must also mark users “Inactive” when the user is out of work for any extended amount of time, such as maternity, paternity, disability or FMLA leave, which will keep them off the User Login Report.

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 to the HMIS Administrator and the Executive Director of the Agency within 24 hours of detection. Each agency will follow their agency’s policy around disciplinary action that is needed. The HMIS Administrator will follow the HMIS Policy around violations listed above in section 4.8.

#### **4.10 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 the Information Security Policy outlined in this document regarding client-identifying information stored on local computers.

#### **4.11 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 staff 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 Specialist 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

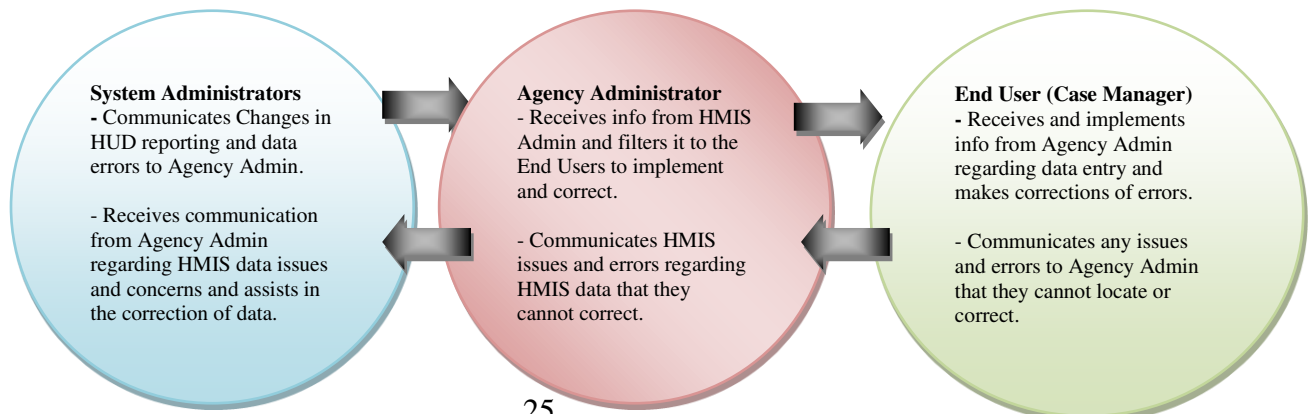
## 5.2 Participating Agency Service Request

**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 day 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 of 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 interruptions to service that are expected to exceed two (2) hours. When an event occurs that makes the system inaccessible The HMIS Administrator and WellSky will decide to switch service to the secondary server. At this point, users will be able to resume 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 policies 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 for any other purposes will conform to the following:

- Requests for the release of client specific data by a non-HMIS participating agency must be submitted to the HMIS Administrator, and the request can only be for clients that are receiving services from that 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 to the HMIS Agency Administrator and staff. All Data Request forms are subject to approval via the HMIS Administrator and/or HHC Director and will need at least 2 weeks to process.
- Only de-identified aggregate data (that is data devoid of Names, Social Security Numbers, Dates of Birth or any other identifying information) will be released.
- Only data filtered for data quality, accuracy and completeness will be released for public use or consumption.
- Any project/agency can use their own project data in HMIS for internal or external use, however, the active Agency Administrator must ensure the accuracy of the data by conducting proper data quality clean up practices.
- 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. Such request must be sent to the HMIS Director of the HHC. Agencies should not be releasing any such data located within or printed from HMIS.
- 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. The data released in this export is identifiable, however when the data is uploaded into the NYSHADE warehouse, all identifiable information is filtered out and the data can no longer be tracked back to any specific individual client. However, any client who has not consented to share their data (signed the HMIS ROI) is left out of any data export. This part of the policy does not pertain to the CNY COMP HMIS database.
- Any data requests for publication or large data requests for multiple years of data will be reviewed by HHC staff and HHC Board for approval if needed.

## **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 the 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 input the data, no cross-system sharing will occur.

## **6.3 Client Care Coordination and Data Sharing:**

**Policy:** Participating agencies that are part of a HHC Committee or Workgroup have the ability to share client information that was entered into HMIS for the purpose of coordinating housing, supportive and other needed services for clients entered into CNYHMIS. agencies called the “HHC Committee and Workgroup Coordinated Services Data Sharing Agreement.” This policy does not pertain to the CNY COMP HMIS database.

## **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 format
- Clients with more than one last name shall be hyphenated. This standard requires 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 1***

#### **List of HMIS Agencies**

- 1. ACR Health**
- 2. Altamont – HVHC GPD**

3. **A Tiny Home for Good**
4. **Catholic Charities of Onondaga County**
5. **Cayuga Community Action Agency**
6. **Cayuga County Community Health Network, Inc.**
7. **Cayuga County Department of Social Services**
8. **Center for Community Alternatives, Inc.**
9. **Chadwick Residence, Inc.**
10. **Chapel House, Inc.**
11. **CirCare**
12. **City of Syracuse, Department of Neighborhood and Business Development**
13. **Contact Community Services**
14. **Frank Hiscock Legal Aid Society**
15. **Helio Health (Syracuse Behavioral Health & CNY Services)**
16. **Housing Visions**
17. **Interfaith Works**
18. **In My Father's Kitchen**
19. **Kristina's House of Hope**
20. **Liberty Resources, Inc.**
21. **Monroe Plan for Medical Care**
22. **Nescentia Health**
23. **NYS Office of Temporary and Disability Assistance (OTDA)**
24. **Onondaga County Department of Social Services**
25. **Onondaga County Division of Mental Health for Children, Families and  
Individuals**
26. **Onondaga County Department of Adult Protective Services**
27. **Onondaga County Department of Health**
28. **Onondaga County Justice Center**
29. **Onondaga County Youth Bureau**
30. **Oswego County Catholic Charities**
31. **Oswego County Department of Social Services**
32. **Oswego County Opportunities, Inc.**
33. **Rescue Mission**
34. **Samaritan Center**
35. **Soldier On**
36. **St. Joseph's Hospital Health Homes**
37. **Syracuse Housing Authority**
38. **The Salvation Army Syracuse Area Services**
39. **Upstate Medical University Hospital**
40. **Veterans Administration**
41. **Victory Transformations**
42. **Volunteer Lawyers Project of Central New York**
43. **YMCA of Central NY**
44. **YWCA of Central NY**

**Retired Agencies in HMIS**

Auburn Housing Authority  
Catholic Charities of Oswego County  
Easter Seals  
Greater Syracuse Tenants Network  
Jamesville Correctional Facility  
Last House on the Block  
Legal Aid Society of Mid-New York, Inc.  
Northeast Community Center  
Spanish Action League  
Syracuse Housing Tenants Association  
Visions for Change

**List of CNY COMP HMIS Agencies:**

Oswego County Opportunities, Inc.  
Vera House, Inc.

***Attachment II: Agency Participation Agreement***

**Agency Partnership Agreement**

This agreement is entered into on the \_\_\_\_\_<sup>th</sup> day of \_\_\_\_\_, 20\_\_ between the Housing and Homeless Coalition of Central New York acting as the designated HMIS Lead Agency for the Housing and Homeless Coalition of Central New York (hereinafter "HMIS Lead Agency") and \_\_\_\_\_(agency name) (hereinafter "Provider Agency") regarding access and use of the Onondaga/Oswego/Cayuga Homeless Management Information System (hereinafter "CNY HMIS").

**I. Introduction**

The CNY HMIS, a shared homeless database, allows authorized personnel at Provider Agencies throughout the geographic area of Onondaga, Oswego, and Cayuga County to input, use, and receive information concerning their own clients and to share information on common clients subject to the following agreement and in accordance with CNY HMIS Policy.

Required CNY HMIS Goals include:

- a) Improved coordinated care for and services to people experiencing homelessness.
- b) Minimally impacting automated systems of current providers.
- c) Meeting reporting requirements including U.S. Department of Housing and Urban Development (HUD) and non-HUD reports.
- d) Complying with all state and federal requirements regarding client/consumer confidentiality and data security (HIPAA, etc.).

Goals participating agencies:

- a) The opportunity for people experiencing homelessness to access services through self-referral and self-education.

- b) Automated processes to replace manual processes (when practical).
- c) Delivering timely, credible, quality data about services and homeless people to the community.
- d) Expansion to include new providers that serve those experiencing homelessness or who are at risk of homelessness.
- e) HMIS Participation by all projects that serve those experiencing homelessness or who are at risk of homelessness in the Onondaga, Oswego, and Cayuga County geographic area.
- f) Systematically utilizing the Coordinated Entry System, which includes sending and receiving referrals via the HMIS, and following the Coordinated Entry policy for prioritization.

The HMIS Lead Agency administers the CNY HMIS, contracts with WellSky, which was previously known as Mediware Information Services into house the HMIS database central server and limits Provider Agencies access to the HMIS database. Utilizing a variety of methods<sup>1</sup>, HMIS Lead Agency intends to protect, to the utmost of its ability, the CNY HMIS data from accidental or intentional unauthorized modification, disclosure, or destruction.

Designed to benefit multiple stakeholders<sup>2</sup>, the CNY HMIS, when used correctly and faithfully, will improve knowledge about people experiencing homelessness or at-risk of homelessness - their services and service needs, and may result in a more effective and efficient service delivery system.

## II. Confidentiality

A. The Provider Agency will uphold relevant federal and state confidentiality regulations and laws that protect client records and will only release confidential client records with written consent by the client<sup>3</sup> or the client's legal guardian<sup>4</sup>, unless otherwise provided for in regulations or laws.

1. The Provider Agency will abide specifically by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2, regarding disclosure of alcohol and/or drug abuse records. In general terms, the federal regulation prohibits 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 Provider Agency understands the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.

2. The Provider Agency will abide specifically, when applicable, with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and corresponding regulations passed by the Federal Department of Health and

---

<sup>1</sup> See WellSky ServicePoint manual for further information.

<sup>2</sup> Provider agencies, people experiencing homelessness, HUD, the Onondaga, Oswego, & Cayuga CoC and its members, fund providers and the community.

<sup>3</sup> Anyone who receives services from an agency.

Human Services. In general, the regulations provide consumers with new rights to control the release of medical information, including the right: to give advance consent prior to disclosures of health information; to see a copy of health records; to request a correction to health records; to obtain documentation of disclosures of health information; to obtain an explanation of privacy rights and to be informed about how information may be used or disclosed. The current regulation provides protection for paper, oral and electronic information.

3. The Provider Agency will abide by NYS State Laws and Federal Laws related to confidentiality and security of medical, mental health and substance abuse information and other relevant statutes, rules and regulations.

4. The Provider Agency will provide a verbal explanation of the CNY HMIS and arrange, when possible, for a qualified interpreter or translator for an individual not literate in English or having difficulty understanding the consent form(s). The Provider Agency shall always provide an ASL interpreter when needed and shall provide any other reasonable accommodations required (in accordance with the ADA) required to assist a person with a disability in understanding the nature of the CNY HMIS and the effect of the consent to disclosure of information.

5. The Provider Agency will not solicit or input information from clients into the CNY HMIS unless specific information proves essential to provide services, to develop reports and provide data, and/or to conduct evaluations and research. Evaluation and research will only use de-identified client data except in the case when the Provider Agency evaluates and researches its own clients. In all cases, the Provider Agency shall maintain compliance with all state and federal laws regarding research, evaluation, and confidentiality of individual client identities.

6. If a Human Subjects Review Committee or similar committee exists within the Provider Agency, then the Provider Agency, wishing to conduct evaluation or research, must submit its request and be approved by that committee prior to conducting the evaluation or research.

7. The Provider Agency shall not divulge any confidential information received from the CNY HMIS to any organization or individual without proper written consent by the client (or guardian where appropriate) unless otherwise permitted by relevant regulations or laws.

8. The Provider Agency shall ensure that every person, before being issued a User Identification and Password to the CNY HMIS, does the following:

- a. Reads and agrees to abide by this Partnership Agreement.

- b. Obtains, reads, and agrees to abide by the CNY HMIS User Guide<sup>5</sup>;
- c. Reads and signs a consent form stating an understanding of, and agreement to comply with CNY HMIS confidentiality practices<sup>6</sup>;
- d. Reads and signs the HMIS Code of Ethics form<sup>7</sup>;
- e. Creates a unique User I.D. and password; and
- f. Understands and agrees that they shall not share or reveal that information to anyone by written or verbal means.

9. The Provider Agency will work with the System Administrator to assign the security protocols for each of its providers based on restrictions necessary to meet New York State Law.

10. The Provider Agency understands that individuals granted Agency Administrator access within each agency must become a Designated CNY HMIS Agency Administrator through specific training provided by the HMIS Lead Agency/WellSky. and agrees to attend or send a representative to the CNY HMIS Data Administrator Committee meetings.

11. The Provider Agency understands that all client information will be encrypted <sup>8</sup> on a file server physically located in a locked office with controlled access, at the offices of WellSky located at 333 Texas Street, Suite 300, Shreveport, Louisiana 71101.

12. Each provider agency must designate a security officer responsible for ensuring compliance with applicable security standards.

B. The Provider Agency agrees to document, via a signed CNY HMIS Client Release form, a client's (or guardian's when appropriate) understanding and consent to share client information across a central database and the reasons for this. (COMP HMIS is exempt from the participation in the CNYHMIS Release) Furthermore,

- 1. An individual client over the age of 18 (or guardian) must give informed client consent by understanding and signing the Release form at the Provider Agency prior to the Provider Agency sharing any client information to another agency.

---

<sup>5</sup> One copy of the original HMIS manual and updates are provided by the HMIS LEAD AGENCY. This manual will include information on how to use the CNY HMIS as well as basic steps to ensure confidentiality.

<sup>6</sup>The Provider Agency will be responsible for managing any of its own requirements that individual employees comply with CNY HMIS confidentiality practices, such as having employee's sign ethics form provided by the HMIS LEAD AGENCY.

<sup>7</sup> See Code of Ethics form

<sup>8</sup> See WellSky ServicePoint Manual for encryption specifications

2. A Parent/guardian of children under the age of 18 years of age, is permitted to provide consent to share the child(ren) data by signing the Release of Information.
3. All clients in a single household that are over the age of 18, including adult children must sign their own Release of Information. For children who are active in a project and turn 18, they must sign their own Release of Information separate from their parent/guardian.
4. The completed Release form provides:
  - a. Informed client consent regarding basic identifying client data that is entered into a shared database.
  - b. Release of service transaction information to be shared for report purposes; and
  - c. Client release authorizing the sharing of basic client identifying information among CNY HMIS Provider Agencies.
5. Two scenarios may occur if a client denies authorization to share basic identifying information and service data via the CNY HMIS. Each allows only the entering Provider Agency access to client information and precludes the ability to share information. **Either:**
  - a. A Client Profile section within ServicePoint will be marked restricted. **OR**
  - b. A client will be entered with an alias
6. The Provider Agency will incorporate a CNY HMIS clause into existing Provider Agency Authorization for Release of Information form(s) if the Provider Agency intends to share confidential client data within the CNY HMIS. The Provider Agency's modified Authorization for Release of Information form(s) will be used when offering a client, the opportunity to input and share information with the CNY HMIS beyond basic identifying data and service information. The Provider Agency will communicate to the client what information, beyond basic identifying data and services will be shared if client consent is given. The Provider Agency will communicate to the client that while the Provider Agency can restrict information to be shared with select agencies, other agencies will have access to the information and are expected to use the information professionally and to adhere to the terms of the CNY HMIS Partnership Agreement. Agencies with whom information is shared are each responsible for obtaining appropriate consent before allowing further sharing of client records.
7. Each Provider Agency is responsible for ensuring that its staff and users comply with the requirements for informed consent and client

confidentiality. The HMIS Lead Agency<sup>9</sup> will ensure and conduct periodic monitoring and reviews with Provider Agencies to enforce informed consent standards, including:

- a. Appropriate documentation indicating client awareness and consent of data being entered into central database; and
- b. Consent to release certain information.

8. The Provider Agency agrees to place all Client Authorization for Release of Information forms related to the CNY HMIS in a file to be located at the Provider Agency's business address and that such forms be made available to the CoC for periodic audits. The Provider Agency will retain these CNY HMIS-related Authorization for Release of Information forms for a period of five years upon expiration, after which time the forms will be discarded in a manner ensuring un-compromised client confidentiality.

9. The Provider Agency understands that to update, edit, or print a client's record, the Provider Agency must have on file current client authorization as evidenced by a completed standard CNY HMIS Authorization to Release form pertaining to basic identifying data, and/or a modified Provider Agency form with a CNY HMIS Clause pertaining to confidential information.

The Provider Agency agrees to enter the minimum data required in the CNY HMIS; however, this does NOT mean that a Provider agency is required to share client identifiable information. A client's information may be restricted from overall access when the client refuses to allow his/her name, social security number or other personally identifiable information to be shared in the database.

C. Each Provider Agency owns the client data they enter. However, as a partner in the CNYHMIS, each agency agrees to share data with other organizations, including organizations outside of CNY HMIS users, provided no client identifiers are shared. Unless restricted by New York State Law.

1. In the event the CNY HMIS ceases to exist, the HMIS Lead Agency will notify Provider Agencies and provide a six-month time period for the Provider Agencies to access and save agency specific client data, statistical data and frequency data from the entire system. Then, the centralized server database will be purged or stored. If the latter occurs, the data will remain in an encrypted and aggregated state.

2. In the event the HMIS Lead Agency ceases to operate the CNY HMIS, another organization will administer and take custodianship of the data.

---

<sup>9</sup> The HMIS Lead Agency may conduct these reviews or may accept a similar review by another organization as evidence of Provider Agency compliance.

The HMIS Lead Agency or its successor Agency will inform, in a timely manner, all Provider Agencies.

3. If the Provider Agency ceases to exist, it shall notify and work with the HMIS Lead Agency to determine the appropriate disposition of Provider Agency's data, including the transfer of the data to a successor agency.

4. If the Provider Agency chooses to withdraw from the CNY HMIS, the Provider Agency shall notify the HMIS Lead Agency of intended withdrawal date. The HMIS Lead Agency shall allow sixty days for the Provider Agency to access and save agency specific client data, statistical data and frequency data from the entire system. The Provider Agency is financially responsible for extracting its data.

5. In the event WellSky ceases to exist, the HMIS Lead Agency will notify Provider Agencies in a timely manner of the expected result of this event.

## II. Data Entry and/or Regular Use

- A. User Identification and Passwords **are not** permitted to be shared among users.
- B. If a Provider Agency has access to a client's basic identifying information, non-confidential service transactions and confidential information and service records, it will be generally understood that a client gave consent for such access. However, before a Provider Agency can update, edit, or print such information, it must have informed client consent, evidenced by a current standard CNY HMIS Authorization to Release form in writing pertaining to basic identifying data and/or a Provider Agency modified form with a CNY HMIS Clause pertaining to confidential information.
- C. If a client has previously given permission to multiple agencies for them to have access to her/his information, beyond basic identifying information and service transactions, and then chooses to eliminate one or more of these agencies, the Provider Agency where the request is made will then either close the entire record, or simply restrict portions of the record to the other agency or agencies.
- D. In the event that a client would like to lock all visibility of the record in the CNY HMIS completely, the Provider Agency at which her/his desire is expressed will work with the client to complete a Visibility Request Form<sup>10</sup>, which will be sent to the System Administrator to lock down visibility of the whole client or parts of a client record. Information about a client whose record has been "hidden" will remain in the central

---

<sup>10</sup> Visibility Request Form provided by the HMIS Lead Agency.

database for a period as required by law or the agency policy and will remain accessible by the Provider Agency, which provided services to the client for reporting purposes. This record will, however, be restricted for use or viewing by other HMIS participating agencies apart from System Administrators and Agency Administrators with higher access to the system. Clients can revisit and open visibility back up at any time. Providers working with the client will revisit this with the client in 30, 60, 90, 180 or 365 days after the visibility was changed.

- E. The Provider Agency shall enter information in the CNY HMIS about individuals for whom they complete an intake.
- F. Provider Agency shall not enter any fictitious or misleading client data on an individual or family in the CNY HMIS.
- G. The Provider Agency shall not misrepresent the number of clients served or the type of services / beds provided in the CNY HMIS by entering known, inaccurate information (i.e., Provider Agency will not purposefully enter inaccurate information on a new record or to override information entered by another agency).
- H. The Provider Agency shall enter information into the CNY HMIS according to agency and CNY HMIS adopted standards and will strive for real-time, or close to real-time, data entry. Real-time or close to real-time is defined by either immediate data entry upon seeing a client, or data entry into the CNY HMIS within one business day. This assumes that the Provider Agency has sufficient computers available for all staff performing data entry into the CNY HMIS.
- I. The Provider Agency understands that with a current standard CNY HMIS Authorization for Release form on file, it can update, edit, and print a client's basic identifying information.
- J. The Provider Agency understands that a modified agency Authorization to Release Information form, with the added CNY HMIS Clause, permits it to share confidential client information with select agencies.
- K. The Provider Agency understands that only the individual who created the assessment screens, or an authorized person<sup>11</sup> by originating agency can edit assessment screens. The Provider Agency will create a separate assessment, as needed, to indicate a change in a client's status, updates, and to edit incorrect information.
- L. Discriminatory comments by an employee, volunteer, or other person acting on behalf of the Provider Agency based on race, color, religion, national origin, ancestry, handicap, age, sex, gender identity and sexual

---

<sup>11</sup> Individual is employed or authorized to change information by originating agency.

orientation are not permitted in the CNY HMIS. Offensive language and profanity are not permitted in the CNY HMIS. This does not apply to the input of direct quotes by a client **IF** the Provider Agency believes that it is essential to enter these comments for assessment, service and treatment purposes.

**M. The Provider Agency will utilize the CNY HMIS for business purposes only.**

N. The Provider Agency understands the HMIS Lead Agency will provide initial training and periodic updates to that training to assigned Provider Agency staff about the use of the CNY HMIS. This information is to then be communicated to additional staff using the CNY HMIS within the Provider Agency.

O. The Provider Agency understands the HMIS Lead Agency will provide a help desk with technical support according to the following:

Support telephone numbers and email addresses will be provided to Provider Agencies upon signing this Agreement. HMIS Lead Agency will ensure that any support calls are responded to according to the Severity Code Response Time below, provided that all available numbers and e-mail addresses have been accessed.

In the event of non-response, the Provider Agency should notify the System Administrator at the HMIS Lead Agency.

Severity Code Response Times

Severity	Description	System Administrator (SA) Response
1	Major system or component is inoperative which is critical to the Agency's business.	Contact WellSky within 15 minutes and notify HMIS LEAD AGENCY of action plan and resolution within 1 hour.
2	Agency is impacted by service delay but is still able to maintain business function.	During normal business hours, the HHC will initiate problem resolution within four hours and notify Agency of action plan and resolution within 6 hours.
3	The problem has a reasonable circumvention and agency can continue with little loss of efficiency.	During normal business hours, initiate problem resolution within eight hours and notify Agency of action plan within 24 hours.
4	The call requires minor action or is for informational purposes only.	Response time within 48-72 hours.

- P. The Provider Agency will keep updated virus protection software on agency computers that access the CNY HMIS.<sup>12</sup>
- Q. Transmission of material in violation of any United States federal or state law or regulation is prohibited and includes, but is not limited to copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
- R. The Provider Agency will not use the CNY HMIS with intent to defraud the federal, state or local government or an individual entity, or to conduct any illegal activity.
- S. The Provider Agency recognizes the CNY HMIS Data Administrators Group will serve as a discussion center regarding the CNY HMIS, including CNY HMIS process updates, policy and practice guidelines, data analysis, and software/hardware upgrades. The Provider Agency will designate an Agency staff member to attend CNY HMIS Data Administrator Committee meetings regularly and understands that the HMIS Lead Agency will continue to be responsible for coordinating the CNYHMIS Administrators Committee activities.
- T. The Provider Agency acknowledges that other agencies will periodically have access to de-identified data on the central database. To ensure the information generated by or through the CNY HMIS presents an accurate picture of homelessness and services to people experiencing homeless in the Onondaga, Oswego, and Cayuga County region, the Provider Agency will enter data in a timely and accurate manner.
- U. Each Provider Agency assumes responsibility for its staff and users' compliance regarding requirements for data entry and use of the CNY HMIS. To assess the quality of data and reports generated by the system, the HMIS Lead Agency<sup>13</sup> will conduct periodic monitoring and reviews on data. These include and are not limited to the following:
1. Quality of data entered by Provider Agencies, including
    - a. Inappropriate and/or duplicate records,
    - b. Untimely and/or inaccurate information, and
    - c. Missing required data elements.
  2. Operation of the software; and
  3. Reporting functionality.
- V. Provider Agencies must notify HMIS Lead Agency in writing of any changes to User ID including, but not limited to, new personnel, and released or terminated personnel.

---

<sup>12</sup> Provider Agency assumes financial responsibility for virus protection software.

<sup>13</sup> The HMIS Lead Agency, may conduct these reviews or may accept a similar review by another organization as evidence of compliance by the Provider Agency.

- W. Provider Agency will receive security awareness training prior to being given access to HMIS and annually, that reflects the policies of the CoC and requirements of the HMIS Security Standards.
- IV. Reports
- A. The Provider Agency understands that it will retain access to all identifying and statistical data on the clients it serves.
  - B. The Provider Agency understands that it may have access to personally identifiable client information even if the Provider Agency has not served the client or obtained a client's Consent to Release Information form. The Provider Agency agrees to **not report or release** any identifiable client information on clients that the Provider Agency has not served or obtained a signed Consent to Release Information form.
  - C. The Provider Agency understands that before non-identifying system-wide aggregate information collected by the CNY HMIS is disseminated to non-CNY HMIS Member Agencies, including funders, the Data Administrator Committee and/or the CoC shall agree to it<sup>14</sup>.
- V. Proprietary Rights and Database Integrity
- A. The Provider Agency shall not give, or share assigned user identification and passwords to access the CNY HMIS with any other organization, governmental entity, business, or individual.
  - B. The Provider Agency shall not cause in any manner, or way, corruption of the CNY HMIS. Any unauthorized access or unauthorized modification to computer system information or interference with normal system operations, whether on the equipment housed by the HMIS Lead Agency or any computer system or network related to the CNY HMIS will result in immediate suspension of services and the HMIS Lead Agency will pursue all appropriate legal action.
- VI. Hold Harmless
- A. The HMIS Lead Agency makes no warranties, expressed or implied. The Provider Agency, at all times, will indemnify and hold the HMIS Lead Agency harmless from any damages, liabilities, claims, and expenses that may be claimed against HMIS Lead Agency or the Provider Agency, or for injuries or damages to HMIS Lead Agency or the Provider Agency or another party arising from participation in the CNY HMIS, or arising from any acts, omissions, neglect or fault of the Provider Agency or its agents, employees, licensees, or clients, or arising from the Provider Agency's failure to comply with laws, statutes, ordinances or regulations applicable to it or the conduct of its business. This Provider Agency will also hold

---

<sup>14</sup> The CNY HMIS Administrators Group will serve in part to protect the confidentiality of clients and the integrity of the data by requiring certain methods of data analysis be utilized.

the HMIS Lead Agency harmless for negative repercussions resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption caused by the Provider Agency's negligence, errors, or omissions, as well as natural disasters, technological difficulties, and/or acts of God. The HMIS Lead Agency shall not be liable to the Provider Agency for damages, losses, or injuries to the Provider Agency or another party unless such is the result of negligence or willful misconduct of the HMIS Lead Agency or its agents, employees, licensees, or clients.

- B. The Provider Agency makes no warranties, expressed or implied. The HMIS Lead Agency, at all times, will indemnify and hold the Provider Agency harmless from any damages, liabilities, claims, and expenses that may be claimed against the HMIS Lead Agency or Provider Agency, or for injuries or damages to the HMIS Lead Agency, the Provider Agency, or another party arising from participation in the CNY HMIS, or arising from any acts, omissions, neglect, or fault of the HMIS Lead Agency or its agents, employees, licensees, or clients, or arising from the HMIS Lead Agency's failure to comply with laws, statutes, ordinances or regulations applicable to it or the conduct of its business. The HMIS Lead Agency will also hold the Provider Agency harmless for negative repercussions resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption caused by the HMIS Lead Agency or a Provider Agency's negligence, errors, or omissions, as well as natural disasters, technological difficulties, and/or acts of God. The Provider Agency shall not be liable to the HMIS Lead Agency for damages, losses, or injuries to the HMIS Lead Agency or another party unless such is the result of negligence or willful misconduct of the Provider Agency or its agents, employees, licensees, or clients.
- C. The Provider Agency agrees to keep in force a comprehensive general liability insurance policy with combined single limit coverage of not less than five hundred thousand dollars (\$500,000). Said insurance policy shall include coverage for theft or damage of the Provider Agency's CNY HMIS-related hardware and software, as well as coverage of Provider Agency's indemnification obligations under this Agreement.

VII. HMIS Lead Agency Responsibilities:

- A. Enter into a contract and maintain the services of the ServicePoint software according to the terms and conditions of the contract with the Software Provider.
- B. Maintain a System Administrator who will provide training, implementation, help desk and support to the Provider Agencies.
- C. Designate a security office to be responsible for ensuring compliance with applicable security standards.

VIII. Dispute Resolution and Appeals

- A. If a Dispute arises out of this Agreement, the Provider Agency shall make every effort to address and resolve those issues with the Executive Director of the HHC.
  - B. If the Executive Director of the HHC and the Provider Agency are unable to reach a solution, either party may raise the issue to the HHC Executive Board for a solution.
  - C. The HHC Executive Board may recommend a solution or may request that the parties raise the issue to the HHC Advisory Board.
  - D. The HHC Advisory Board will make every effort to resolve the issue; however, if the issue cannot be adequately resolved at this level, the HHC Advisory Board shall recommend a process to reach resolution.
- IX. Terms and Conditions
- A. The parties hereto agree that this Agreement is the complete and exclusive statement of the agreement between parties and supersedes all prior proposals and understandings, oral and written, relating to the subject matter of this Agreement.
  - B. Neither party shall transfer or assign any rights or obligations without the written consent of the other party.
  - C. This Agreement shall remain in-force until revoked in writing by either party with 30 days advance written notice. The exception to this term is if allegations, or actual incidences, arise regarding possible, or actual, breaches of this agreement. Should such a situation arise, the HMIS Lead Agency may immediately suspend access to the CNY HMIS until the allegations are resolved in order to protect the integrity of the system.
    - 1. When the HMIS Lead Agency becomes aware of a possible or actual incident, it shall make a reasonable effort to address its concerns with the Executive Director of the Provider Agency prior to taking action.
    - 2. If HMIS Lead Agency believes that the breach by a Provider Agency's such that it may damage the integrity of the central database and the information in the central database for the Provider Agency or any other Agency, it may take immediate steps to suspend the Provider Agency's access to the CNY HMIS prior to addressing the concerns with the Executive Director of the Provider Agency. The HMIS Lead Agency will then address the concern with the Executive Director of the Provider Agency to resolve the issue.
    - 3. If the concern is not resolved satisfactorily between the HMIS Lead Agency and the Executive Director of the Provider Agency,

the HMIS Lead Agency shall consult with the HHC Executive Board prior to taking further action.

4. Action with a Provider Agency may include the provision of training and technical assistance, suspension of access to the central database or other appropriate measures to ensure that the data integrity is maintained.
- D. If a Provider Agency believes that the action taken is not appropriate, or it cannot meet the conditions of the decision, it may appeal the action to the HHC Advisory Board. If the HHC Advisory Board and the Provider Agency cannot reach agreement, a representative of the HHC Executive Board, the HMIS Lead Agency and Provider Agency shall address the issue before the HHC Advisory Board. Decisions by the Board are final; however, all parties will make every attempt to reach reasonable accommodation for the Provider Agency.
  - E. This agreement may be modified or amended by written agreement executed by both parties with 30 days' advance written notice.

Use of the CNY HMIS constitutes acceptance of these Terms and Conditions, and to any and all updates that occur to future drafts of this document.

\_\_\_\_\_  
Executive Director Signature

\_\_\_\_\_  
Date (d/m/y)

\_\_\_\_\_  
Name and Address of Provider Agency

\_\_\_\_\_  
Printed Name of (Provider Agency) Executive Director

\_\_\_\_\_  
Date (d/m/y)

\_\_\_\_\_  
Primary Voting Agency Administrator Name

\_\_\_\_\_  
Date (d/m/y)

\_\_\_\_\_  
Secondary Voting Agency Administrator Name

\_\_\_\_\_  
Date (d/m/y)

\_\_\_\_\_  
Sarah Schutt  
HMIS Lead Agency  
HMS Director  
Housing & Homeless Coalition of Central New York  
580 South Salina Street  
Syracuse, NY 13202

\_\_\_\_\_  
Date (d/m/y)

### ***Attachment III: HMIS Licensing Fee Policy***

#### **HMIS User License Fee Policy**

The Housing and Homeless Coalition of Central NY (HHC) operates and oversees the Homeless Management Information System (HMIS) under the supervision of the collaborative applicant, the Housing and Homeless Coalition of Central New York. The HHC approves all licenses and access to HMIS. Any project or license that is a non-essential HMIS project will be required to pay the costs of the license, at the cost determined by the vendor of HMIS, Wellsky. An essential license is when an End User whose Home Provider/ Primary Provider in HMIS enters or edits client level data into a project provider, and is associated to one of the following categories of projects:

1. A project's funding source requires the use of HMIS for reporting purposes that are under the following categories:
  - a. The HMIS data is exported from HMIS and uploaded into the funding source's reporting repository (ie: SAGE, RHYMIS, etc.). Also, the End

User is an Agency Administrator and oversees the data quality within those required reports.

2. A project that is categorized as one of the following types according to the HMIS definition:
  - a. Street Outreach
  - b. Emergency Shelter
  - c. Transitional Housing
  - d. Rapid Rehousing
  - e. Other Permanent Housing
  - f. Permanent Supportive Housing
  - g. Homelessness Prevention
3. A housing project provider serves primarily homeless individuals and families under the HUD definition of homelessness.

A non-essential license is any other license that is used for any other purpose than listed above. This includes all licenses that are for Read-Only access.

Annual HMIS License Fees

Approved agencies can purchase a single new user license for an initial fee, which is set forth in the attached Schedule of Fees. This is a one-time cost. Approved agencies refer to agencies that have obtained approval to access HMIS through the Data Administrator Committee and Performance Evaluation and Selection Committee. Approved agencies may purchase licenses at any time, but they must first enter an MOU with the HHC / Housing and Homeless Coalition of Central NY for the collection of the licensing fees. Non-approved agencies would have to follow the approval process outlined in the HMIS Policies and Procedures in order to purchase licenses.

After the initial fee, the agency is then responsible for an annual maintenance fee for the license which has a yearly cost that is set forth in the attached Schedule of Fees. This fee will be prorated for the current date within the fiscal year, which runs from August 1<sup>ST</sup> through July 31<sup>st</sup>.

All costs associated with HMIS user licenses are subject to change, as cost determined by Wellsky. Any change in cost will be voted upon by the HMIS Data Administrator Committee for approval.

Billing for licenses will occur once annually in July, covering August through July. The annual fee must be paid within 60 days following the date of the invoice. If an agency fails to pay license fees by the stated due date on the invoice, the agency’s license(s) may be suspended until HHC receives the payment in full.

**SCHEDULE OF FEES**  
**Current as of (08/01/2024)**

<b>License Purchase (One Time)</b>	<b>\$205</b>
<b>Annual Fee</b>	<b>237.50</b>

## ***Attachment IV: Client Fact Sheet***

### **HMIS Client Fact Sheet**

#### **What is HMIS?**

HMIS stands for Homeless Management Information System. It is a web/internet-based system where all client level data is kept for all homeless programs that assist people who are experiencing homelessness or at risk of becoming homeless.

#### **What is Coordinated Entry?**

- The system and process in which all housing referrals are made.

#### **What is the CNYHMIS Release of information and what does it do?**

- A document that you can sign to allow your data to be shared across the system.
- All services at other programs or agencies can access a history of your information when you are getting assistance with them.
- This may allow for better coordination of those service providers.
- You can end the release at anytime without penalty and your services won't end.

#### **Why would you sign the release of information?**

- You are homeless or at risk of homelessness and are in need of services.
- You will need housing assistance, such as rental assistance, Case Management, or Permanent Housing services.
- You would like the programs you were referred to be able to coordinate and see your information.

#### **Things to consider when signing the release:**

- If you are a client who is currently fleeing an abusive relationship or experiencing domestic violence, you may want to keep your data from not being seen by other agencies in HMIS.
- All agencies listed on the ROI will be able to view this information, but exceptions can be made for specific situations.
- Do I know of friends or family who work at other agencies who I don't want to see my information in HMIS for safety or privacy reasons.

#### **Other Things to know about the ROI and HMIS:**

- Your data is also being shared with the New York State Office of Temporary and Disability Assistance for purposes of data collection and assessment of homelessness across NY State. Once the data is uploaded to the NYSHADE website, all personal identifying information is erased and can no longer be tracked back to you.
- If you have any questions or concerns regarding the ROI please discuss with program staff, their supervisor, or you can email your questions to [hmis@hccny.org](mailto:hmis@hccny.org)

- You can submit a request to lock parts of your file at any time, and that request should be made to The Housing and Homeless Coalition via [hmis@hhccny.org](mailto:hmis@hhccny.org) or 315-428-2218. These requests are only allowed in circumstances where there is a safety or privacy risk to you and/or your children.
- You can request a full audit of your client file at any time via the Client Audit Request form, which is accessible at any agency that participates in HMIS, or you can send a request to [hmis@hhccny.org](mailto:hmis@hhccny.org)

**What happens if someone accesses my data who isn't supposed to?**

- Agency where violation happened will complete an investigation.
- Users in violation will be suspended from the system temporarily pending the results of the investigation.
- If the agency wants the user to keep their access, they must submit a plan to ensure that the user doesn't do that again.
- If HMIS Administrator doesn't agree, the Executive Board of the Housing and Homeless Coalition (HHC) will decide.
- Agency can appeal to the full HHC Advisory Board for final decision for user to have access still.
- All clients who had their information accessed will be notified, if possible, and given a chance to express their thoughts and feelings around the violation.
- All clients are given contact information for the agency whose user accessed their information, and they can file a grievance with that agency.
- All clients can have a full audit of their HMIS record, including any user who accessed their file.

**If you have concerns for your privacy, you can always request an audit of your HMIS record. Your case worker has access to these forms, or you can access them at [www.hhccny.org](http://www.hhccny.org), or you can email [hmis@hhccny.org](mailto:hmis@hhccny.org) and we can email or mail you your requested forms.**

***Attachment V: Client Consent Form***



### CNYHMIS Client Consent Form

www.hccny.org  
housingandhomelesscoalition@gmail.com  
@hccny facebook.com/hccny

Client Name: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

Agency: \_\_\_\_\_ Program: \_\_\_\_\_

I know that this agency is part of the CNY HMIS (Homeless Management information System). The CNY HMIS is a system that uses computers to collect information about homelessness in order to help plan and pay for services to people who are homeless or requiring services to prevent homelessness. The CNY HMIS is administered by the Housing and Homeless Coalition of Central New York (HHCCNY).

With this written consent, CNY HMIS agencies that offer me services may see, and update basic information about me and/or my children including name, gender, race, ethnicity, birth date, veteran status, proof of homelessness, income, insurance, disabilities (including HIV/AIDS status) and service transactions related to housing, food, and material goods.

The Agency shall only release client records to non-partner agencies with proper written consent by the client unless otherwise permitted by relevant laws or regulations. Any research performed with this data is completely de-identified. No personally identifying information will ever be revealed in research or public reporting from HMIS data.

Decisions to deny outreach, shelter, or housing will not be based solely on information in this system. My decision to sign or not sign this consent document will not be used to deny outreach, shelter, or housing services.

I may withdraw the consent except for information that has already been given out or actions already taken, by informing the agency in writing that I want to withdraw my consent. This consent will end one year from the date signed.

I have a right to see my CNY HMIS record, ask for changes, and to have a copy of my record from this agency upon written request.

**CNY HMIS Participating Agencies:**

ACR Health, Altamont (GPD Program), Catholic Charities, Cayuga Community Health Network, Cayuga County DSS, Center for Community Alternatives, Community Action Programs Cayuga/Seneca, ~~Circare~~, City of Syracuse, Chadwick Residence, Chapel House Inc., Contact Community Services, Dept of Veteran Affairs, Helio Health, Hiscock Legal Aid, Housing & Homeless Coalition of CNY (HHC CNY), Housing Visions, In My Father's Kitchen, Interfaith Works, Legal Aid Society of Mid-York, Liberty Resources, Onondaga County DSS, Onondaga County Division of Mental Health for Children, Families, and Individuals, Onondaga County Justice Center/Jamesville Correctional Facility, Oswego County Opportunities, Oswego County DSS, Rescue Mission, Soldier On, St Joseph's Care Coordination Network, The Salvation Army, Samaritan Center, Syracuse Housing Authority, Syracuse/Onondaga County Youth Bureau, Suny Upstate Medical University, A Tiny Home for Good, Victory Transformations Shelter, Volunteer Lawyers Project of Onondaga County, Inc., YMCA of Central NY, YWCA, and The New York State Office of Temporary and Disability Assistance (OTDA).

Dates of release \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
(Date of first service) \_\_\_\_\_ (One year from date of first service)

Client Signature \_\_\_\_\_ Date \_\_\_\_\_

Agency Witness \_\_\_\_\_ Date \_\_\_\_\_

Only check if you are **rescinding** authorization to release information in HMIS.

I rescind my authorization to the CNY HMIS. I do not want any future information to be shared with other agencies in the HMIS

Client Signature \_\_\_\_\_ Date \_\_\_\_\_

**Consent on behalf of household members** – An adult head of household may provide consent on behalf of their family members to share their information in the HMIS.

*Attachment VI: HMIS Data Quality Plan*

# **Data Quality, Integrity, and Performance Standards**

**Syracuse/Onondaga, Auburn/Cayuga, and Oswego COC, NY-  
505**

March 4, 2010

Revised October 1, 2025

Developed by:  
HMIS Data Administrators Committee

<b><u>Table of Contents</u></b>	
<b>General Information</b>	3
<b>Purpose</b>	3
<b>Development Process</b>	3
<b>Definition of Data Quality</b>	3
<b>Goals of the Data Quality Plan</b>	3
<b>Key Reporting Requirements of HMIS</b>	3-4
<b>Definitions</b>	
Homeless Management Information System (HMIS)	4
Comparable Database (COMP HMIS)	4
Client Record	4-5
<b>Roles and Responsibilities</b>	
System Administrator	5
Agency Administrator	6
End User	6
<b>Data Quality Standards</b>	<b>6-7</b>
Timeliness	6-7
Completeness	7
All Clients Served	7
Universal Data Elements	7
Program Specific Data Elements	7-8
Funding Specific Data Elements	8
Accuracy	8
Consistency	8
Monitoring	8
Federal Performance Standards	8-9
Local Performance Standards	9
Project Specific Standards	9-10
Agreement	10
<b>Data Quality Standards Reports</b>	<b>10</b>
<b>Authorization Memorandum</b>	<b>11</b>

## **GENERAL INFORMATION**

### **Purpose**

The purpose of this Data Quality and Integrity Plan is to standardize expectations and provide guidance to HMIS participating programs on the extent, quality and accuracy of data entered into Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care

(NY-505) Homeless Management Information System (HMIS) and Comparable Database (COMP HMIS).

### **Development Process**

NY-505 data quality standards were developed through a collaborative effort across homeless service providers and spearheaded by the HMIS Data Administrator Committee. The process is guided by federal, state, and local performance outcomes and standards.

### **Definition and Justification of Data Quality**

HMIS data quality refers to the extent that data recorded in the HMIS and COMP HMIS accurately reflects data collected. A perfect overlap between recorded 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 COMP HMIS, and the same information in the real world. No data collection system has a quality rating of 100%. However, to meet the NY-505 goal of presenting accurate and consistent information on homelessness, it is critical that the HMIS and COMP 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 to draw reasonable conclusions about the extent of homelessness and the impact of homeless services.

### **Goals of the Data Quality Plan**

- Ensure the availability of timely, accurate data for use in helping to end homelessness.
- Increase the usability of data for purposes of system analysis.
- Prepare data for the CoC NOFO process.
- Prepare all required Federal Reports for the CoC.
- Prepare for other community level reporting requests (State, County and local level).

### **Key Reporting Requirements of HMIS Data**

- HUD Supportive Housing Program (SHP) Annual Progress Report (APR)
- HUD Supportive Housing Program (SHP) Consolidated Annual Performance and Evaluation Report (CAPER)
- HUD Supportive Housing Program (SHP) Longitudinal System Analysis (LSA)
- HUD Supportive Housing Program (SHP) Housing Inventory Count (HIC)
- HUD Supportive Housing Program (SHP) Point In time Count (PIT)
- HUD Supportive Housing Program (SHP) System Performance Measures (SPM)
- HUD Supportive Housing Program (SHP) Notice of Funding Availability (NOFA)
- Veterans Affairs – Supportive Services for Veteran Families (SSVF)
- Health and Human Services (HHS) Runaway and Homeless Youth (RHY)
- SAMHSA – Projects for Assistance in transition from Homelessness (PATH)

### **Definitions**

**Homeless Management Information System (HMIS):** For the purposes of this document HMIS refers to WellSky and the Community Services software application and all modules, assessments, and reporting capabilities contained within.

**Comparable Database (COMP HMIS):** This refers to the WellSky Community Services software application that is a separate system from HMIS. This system is where all Victim Service Providers (VSP) and other Provider Agencies, who are prohibited from entering HMIS, enter their client level data. This includes those agencies who meet the definition of VSP and those who receive funds through HHS Family Violence Prevention and Services Act (FVPSA), DOJ Office of Victims of Crime (OVC), or DOJ Office of Violence against Women (OVW), and who use those funds to help support projects serving survivors of domestic violence, dating violence, sexual assault, or stalking.

**Client Record:** A client record in the HMIS and COMP 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. **Street 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 the individual’s living situation and that a service transaction has occurred. For outreach programs, this can be an alias provided, and entry assessment started that documents the current living situation and a service transaction is attached.
- b. **Homelessness Prevention Services:** Any project that provides rental assistance, utility assistance, eviction prevention 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 are currently homeless.
- c. **Emergency Shelters:** Any facility the primary purpose of which is to provide temporary or transitional shelter for those experiencing homelessness and/or for specific populations of homeless persons, such as survivors of domestic violence, which includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).
- d. **Transitional Housing Programs:** A project that has its purpose facilitating the movement of homeless 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. **Transitional to Rapid Rehousing Programs:** Combines two existing program components, TH and PH-RRH, in a single project to serve individuals and households with children experiencing homelessness. This component provides a safe place for people to stay with financial assistance and wraparound supportive services to help people move into permanent housing as quickly as possible. Joint TH-RRH projects must be set up as two projects in HMIS.
- g. **Permanent Housing Programs:** is long-term, community-based housing that has supportive services for homeless individuals with disabilities.
- h. **Other Permanent Housing Programs:** is long-term, community-based housing that has supportive services for homeless individuals without disabilities.

## **Roles and Responsibilities**

### **System Administrator Role**

- Review all data quality reports for the CoC.
- Forward any reporting errors to the provider for correction.
- Assist the Agency Administrator with the correction of data errors and concerns.
- Provide training to Agency Administrators and End Users.
- Search for and merge all duplicate clients within the system.
- Assist with any required project/funding reporting requirements and training.
- Submit all required federal reports for the CoC.
- Adjust Provider Profiles for data collection purposes, according to local and federal data collection requirements.

### **Agency Administrator Role**

- Review all data quality reports sent by the HMIS Administrator.
- Correct all data quality errors in a timely manner.
- Report any issues or concerns with project level providers to the HMIS Administrator for correction or inquiry.
- Run data quality and integrity reports on quarterly basis minimally, unless the project funder requires more frequent data management.
- Notify the HMIS Administrator of data quality errors unable to be corrected.
- Accurately assess End Users ability to do data entry in an accurate and timely manner to determine if further training is required.

### **End User Role**

- Review and have a complete understanding of all required data points/ workflow requirements for necessary project/ funding types.
- Review the data quality reports sent by Agency Administrator.
- Correct data quality issues in a timely manner.
- At intake, gather the most complete and accurate information about each client and the services needed.
- Attending all training required by HMIS staff and the Agency Administrator.

- Search for clients to prevent duplication of client records, and alert duplicate records to the System Administrator as soon as possible.

### **Data Quality Standards**

The Data Quality Standard for NY-505 outlined is applicable to all HMIS and COMP HMIS participating programs. Unless otherwise noted, all participating programs, including those transferring data from legacy and supporting systems, are expected to achieve and maintain the general standard. Federal standards on data quality is that all projects strive for error rates of less than 5% in all areas of data entry, which are not always realistic. However, all projects with error rates of more than 5% will seek to decrease those error rates yearly.

### **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).

#### **Entry Assessment Timeliness:**

- 24-hour timeline standards are required ONLY for Emergency Shelter project providers, which includes all Hotel/Motel placements by Department of Social Services or any other agency/organization.
- 7-day timeliness standards exist for all other project types, Street Outreach, Homelessness Prevention, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing, Other Permanent Housing, and Supportive Services Only.

#### **Interim Review Timeliness:**

- Update interim reviews must occur within 7 days or less of the changes in data elements located within that assessment.
- Annual Assessments must occur 30 days before or after the anniversary date of the project's start date. This data must be entered into HMIS within 7 days of the assessment date.

#### **Exit Assessment Timeliness:**

- 24-hour timeline standards are required ONLY for Emergency Shelter project providers, which includes all Hotel/Motel placements by Department of Social Services or any other agency/organization.
- 7-day timeliness standards exists for all other project types; Street Outreach, Homelessness Prevention, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing, Other Permanent Housing, and Supportive Services Only.

### **Completeness**

Upholding data completeness ensures that all relevant and required data points located within the workflows for each project are collected. This is to ensure that the data points

are present to allow data analysis for all aspects of the homeless service system. For Street Outreach projects ONLY, the completeness of a project is measured once a date of engagement is recorded within that client record.

### **All Clients Served**

All agencies and project providers that participate in data entry within HMIS and COMP HMIS are required to enter 100% of all clients served within that project.

### **Universal Data Elements**

Universal data elements are to report veteran status, project start date, relationship to head of household, client location/ CoC code, and disabling condition. All agencies and project providers that participate in data entry within HMIS and COMP HMIS are required to enter 100% of all data points within that project.

### **Program Specific Data Elements**

These data elements include destination, income at start/ annual assessment/ exit, and all data points regarding chronic homelessness. All agencies and project providers that participate in data entry within HMIS and COMP HMIS are required to enter 100% of all data points within that project.

### **Funding Specific Data Elements (PATH, ESG, RHY, CoC, SSVF, VA, HOPWA)**

All agencies and project providers that participate in data entry within HMIS and COMP HMIS are required to enter 100% of all data points within that project that are specific to the federal funder.

### **Accuracy**

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

### **Consistency**

The purpose of consistency is to ensure a common interpretation of questions, answers, and which fields need completion in NY-505 HMIS and COMP HMIS. All End Users receive universal training upon entry into HMIS and COMP HMIS, including project & funder specific data points and workflow information. All End Users receive materials that can assist in the consistent interpretation of the data points, including definitions, and provide data collection tips.

### **Monitoring**

All agencies/projects with HMIS and COMP HMIS and access will undergo annual monitoring, which includes an in-depth analysis of data quality and project performance. Site visits will only be conducted for agencies/projects that have been added within the past year, or when there is a change in location of an agency/project. The purpose of monitoring is to ensure that the HMIS Policies and Procedures are being followed, and that the data quality standards are being met.

## **Federal Performance Standards**

The CoC is subject to performance measure outcomes that are outlined in the Notice of Funding Opportunity (NOFO) application. These measures are outlined by HUD to ensure that communities are improving in specific areas outlined by the PIT, HIC and SPM reports. These outcomes are solely used to assess a community's efforts to end homelessness. Every agency who has a project type pulled into these measures; Street Outreach, Emergency Shelter, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing or Other Permanent Housing will be assessed for their impact on the community outcomes. Other project types, such as Homelessness Prevention and Supportive Services Only will be held to some, not all of the performance metrics listed below. Technical Assistance will be offered to all agencies on how to improve these measures for their individual projects.

All project types mentioned above are subject to meet the measure outcomes outlined by the federal government, and work to continue to improve the following measures annually:

1. Length of Time Homeless (ES, TH & SO) – decrease the average length of time by 5% each year.
2. Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness (SO, ES, TH, RRH, & OPH/PSH) within the first 12 months
  - a. Decrease rate of returns by 1% for 0-6 months or rate was <5%
  - b. Decrease rate of returns by 1% for 12 months or rate was <10%
3. Employment and Income Growth (All Project Types)
  - a. Increase in earned income or rate was >20%
  - b. Increase in other income or rate was >50%

*(Exemptions: Homelessness Prevention and Supportive Services Only projects)*
4. Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing (All Project Types)
  - a. Increased rate for SO projects or placement rate into temporary and/or permanent housing of 50%
  - b. Increase rate for ES and TH by 2% or the placement rate >50%
  - c. Increase rate for RRH by 2% or the placement rate is 75% or higher
  - d. OPH and PSH increase by 1% or was 96% or higher
  - e. HP and SSO will increase by 1% or was 80% or higher

## **Local Performance Standards**

All projects within the HMIS and COMP HMIS are subject to the following outcomes for non-cash and medical insurance benefit data points. These include all project types that are located within HMIS and COMP HMIS.

1. The percentage of participants with one or more source(s) of non-cash benefits by program exit will increase yearly.
2. The percentage of participants with medical insurance benefits by program exit will increase yearly.

The CoC Performance Goals for these outcomes are that all projects will strive to reach an overall performance outcome of the following:

RRH, OPH & PSH projects will have the following threshold metrics:

1. 75% of all project participants will obtain one or more source(s) of non-cash benefits at project exit.
2. 100% of all project participants will obtain medical insurance benefits at project exit.

ES, SO and TH projects will have the following threshold metrics:

1. 50% of all project participants will obtain one or more source(s) of non-cash benefits at project exit.
2. 75% of all project participants will obtain medical insurance benefits at project exit.

SSO will have the following threshold metrics:

1. 60% of all project participants will obtain one or more source(s) of non-cash benefits at project exit.
2. 85% of all project participants will obtain medical insurance benefits at project exit.

### **Project Specific Standards**

#### Homelessness Prevention Projects:

80% of all clients served will remain in permanent housing upon exit from the project. This includes those who maintain their housing as well as move to another permanent housing situation.

#### Rapid Rehousing Project:

All projects who house clients into RRH, must improve the average time to move-in yearly, with the overall goal to house clients within 30 days of intake into the project.

#### **Agreement**

The purpose of the agreement is to ensure that all participants in the NY-505 HMIS and COMP HMIS are aware of and have agreed to the NY-505 data quality standards, which are located within the HMIS Data Quality Plan.

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.

For client specific concerns, all providers can utilize case conferencing options via specific workgroups (veterans, street outreach and coordinated entry) or request a case conference through the HHC staff.

### **Data Quality Standards Reports**

The following reports are used to assess project data quality and performance within the CoC.

- HUD Data Completeness Report

- HUD Data Quality Framework Report
- CoC APR Reports
- ESG CAPER
- EVA Report – Hashed CSV Upload tool

**Data Quality, Integrity, and Performance Standards  
Authorization Memorandum – HMIS Membership**

I have carefully assessed the Data Quality Standards for the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC) NY-505.

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 Comparable Database (COMP HMIS) and support the adoption of this Standard.

NY-505 Participating Agency

---

Agency Representative (Print Name)

Representative's Title

---

Signature

Date

***Attachment VII: Data Sharing Agreement/ Policy***



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

**HHC Committee and Workgroup Coordinated Services Data Sharing Agreement**

**The following agencies hereby enter into a "Coordinated Services Agreement:"**

1. Housing and Homeless Coalition of Central New York as HMIS Lead agency
2. \_\_\_\_\_  
(name of program / agency)
3. \_\_\_\_\_  
(name of program / agency)
4. \_\_\_\_\_  
(name of program / agency)
5. \_\_\_\_\_  
(name of program / agency)
6. \_\_\_\_\_  
(name of program / agency)
7. \_\_\_\_\_  
(name of program / agency)
8. \_\_\_\_\_  
(name of program / agency)
9. \_\_\_\_\_  
(name of program / agency)
10. \_\_\_\_\_  
(name of program / agency)

Whereby the above named agencies agree to share the following protected and related information for the purpose of coordination of services for housing:

- Name
- 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
- Housing & Homeless history

**The purpose of this agreement is to coordinate housing, supportive and other needed services for clients entered into the Central New York Homeless Management Information System ("CNYHMIS").**

Furthermore, the participating agencies agree to the following:

- Acknowledge that in transmitting, receiving, storing, processing or otherwise dealing with any consumer protected information, they are fully bound by state and federal statute or regulations governing confidentiality of patient records, including the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part2) and the Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45CFR, Parts 160 & 164), and cannot use or disclose the information except as permitted or required by this agreement or by law.
- Acknowledge that they are prohibited from making any further disclosure of this information outside of this workgroup HHC Street Outreach Committee unless further disclosure is expressly permitted by the written consent of the person/client to whom it pertains or as otherwise permitted by state and federal regulations governing confidentiality of patient records, including the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the
- Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45 CFR, Parts 160 & 164), A general authorization for the release of information is **NOT** sufficient for this purpose.

- Agree to use appropriate safeguards to prevent the unauthorized use or disclosure of the protected information.
- Agree to endeavor to notify each of the other participating agencies, within one business day, of any breach, use, or disclosure of the protected information not provided for by this agreement.
- Agree to adhere to the standards outlined within the Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45 CFR, Parts 160 & 164) and pertinent federal regulations which provide consumers access to their protected information,(164.524), the right to amend protected information (164.526), and receive an accounting of disclosures of protected information (164.528).
- Agree to notify each of the other participating agencies of their intent to terminate their participation in this agreement.
- Agree to resist, through judicial proceedings, any judicial or quasi-judicial effort to obtain access to protected information pertaining to consumers, unless expressly provided for in state and/or federal regulations. The Parties agree to give notice of such action as with any other security breach or unplanned disclosure.

**Data Sharing Agreement for NY-505 Street Outreach  
Committee**

I have carefully assessed the Data Sharing Agreement for the Syracuse/Onondaga, Auburn/Cayuga, and Oswego Continuum of Care (CoC), NY-505.

**The Signature below Constitute Acceptance of the "Coordinated Services Data Sharing Agreement" and the signatories confirm that they are duly authorized to enter into the agreement on behalf of their respective entities.**

---

NY-505 Participating Agency

Agency Representative (Print Name)

Representative's Title

Signature

Date

***Attachment VIII: Data Security Policy Sample***

**Sample Data Security Policy that meets minimum HMIS Requirements.**

**The following policy describes how (Agency) will protect client and agency data.**

**Definitions:**

Agency:

CNYHMIS: Central New York Homeless Management Information System

**Confidentiality:**

As the guardians entrusted with clients' personal data, agency staff have a moral and a legal obligation to ensure that appropriate methods are practiced with the collection, access, and utilization of data. Each staff member is responsible to make sure that client data is only used for the purpose for which it is collected. Proper training, adherence and a clear understanding of client confidentiality are vital to achieving these goals. It is a Client's decision about whether or not to provide information, and which information, if any, shall be shared with other Partner Agencies. The Client must give consent to participate in the program, through the methods described in other policies. However, the agency will still need to collect information on the client in order to provide services, run its operations, and report to its funders.

Relevant points regarding client confidentiality include:

- o A client must consent to participate in the CNY HMIS using your agency's policies regarding client consent, privacy, and confidentiality
- o Client consent may be revoked by that client at any time through a written notice
- o No client may be denied services for failure to provide consent for HMIS
- o Clients have a right to inspect, copy, and request changes in their HMIS records and other agency records
- o HMIS Users may not share client data from the CNY HMIS with individuals or agencies without first obtaining permission from that client

- o HMIS Users will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities in accordance with the CNY HMIS Policies & Procedures manual
- o HMIS Users will comply with Article 27 and HIPAA regulations.
- o Any HMIS User found to be in violation of the CNY HMIS Policies & Procedures, or the points of client confidentiality in this User Agreement, may be denied access to the HMIS, face agency discipline, or criminal prosecution

Minimum data entry on each consenting Client will be the completion of the necessary data fields as required by your agency, which includes HUD HMIS Universal Data Standards, Program-Specific Data Standards, and the data necessary for minimum community reporting.

Agency Staff must obtain informed consent with respect, fairness and good faith for both clients and the CNY HMIS.

B. Each Staff member should maintain high standards of professional conduct in their capacity as a User.

D. Staff members have the responsibility to relate to the Clients of other Partner Agencies with full professional consideration.

Login credentials for staff members to agency systems or shared systems are for the staff member's use only and must not be shared with anyone.

Staff members must take all reasonable means to keep my Password physically secure. Staff members understand that the only individuals who can view information in the agency data systems and shared data systems are authorized users, system administrators, and the Clients to whom the information pertains.

Staff members may only view, obtain, disclose, or use the database information that is necessary to perform my job.

If a staff member is logged into an agency database or shared database and must leave the work area where the computer is located, they **must close any computer programs or log-off** of cloud databases before leaving the work area.

A computer that has an agency database or shared community database "open and running" shall never be left unattended.

Failure to log off the agency database or shared community database appropriately may result in a breach in client confidentiality and system security.

Any hard copies of agency database or shared community database information must be kept in a secure file.

When hard copies of agency database or shared community database information are no longer needed, they must be properly destroyed to maintain confidentiality.

If a staff member notices or suspects a security breach, they must immediately notify the appropriate Administrator for the agency database or shared community database.

Staff members will maintain the confidentiality of client data in the agency database and shared database systems as outlined above and in the Policies and Procedures Manual.

Staff members have received training in how to use any community databases.  
Staff members have read and will abide by all policies and procedures of any community databases.

**Grievances and staff monitoring:**

Clients of the agency are able to access their own records if they request, including HMIS records. HMIS records can be accessed with the HMIS Client Audit Request form.

Grievances regarding inaccuracies in client data can be reported to \_\_\_\_\_(position)\_\_\_\_\_ and will be addressed by \_\_\_\_\_(position)\_\_\_\_\_

The agency has established a process of tracking all filed complaints/ grievances and can provide copies of complaints and resolution to the HMIS Lead Agency and other if requested.

All complaints and grievances are tracked and retained for \_\_\_\_\_ years. Records of complaints and grievances can be provided to involved stakeholders including clients upon request.

The agency will run quarterly User Audit reports on users they supervise in HMIS to ensure client privacy and security.

**Devices and Hardware:**

The agency will maintain an adequate internet connection and a network or workstation firewall.

Agency data cannot be accessed using public WiFi networks. Staff can use personal WiFi networks if the network is password-protected and is not publicly accessible.

Personal devices may not be used to access agency data.

Agency computer hardware will be maintained and updated on a regular basis.

**Permissions for agency data:**

Who has access to agency data:

Purpose of accessing agency data:

How they can transmit the information:

How offline data will be stored:

How often data will be disposed of:

---

Executive Director Signature

(Dependent on the agency's

**Attachment IX: Visibility Request Form 2025**

**Visibility Request Form**

This form is used to adjust visibility settings within a client record to ensure a higher level of protection of current and historical data for safety concerns expressed by the client and/or agency staff.

**Please check the following reason for the request (you may choose more than 1): \***

- Current/active order of protection against another person.
- Domestic violence, dating violence, sexual assault, stalking, sex trafficking, or labor trafficking.
- Have a family member, friend or ex-partner working at another HMIS Agency.

Name of employee & Agency: \_\_\_\_\_

- Other reason (please describe):

\_\_\_\_\_  
\_\_\_\_\_

**Client Name\*** \_\_\_\_\_

**Date of Birth\*** \_\_/\_\_/\_\_ **AND/OR Social Security Number\*** \_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

Client identification was verified by the following source:

- Identification card; license, permit, non-drivers ID, Sherriff's ID, school ID, etc.
- Birth certificate
- Agency staff verification of identity
- Other records, school records, medical records, etc.
- HMIS record, which must include a picture.

Request is for the following:

- Complete lockdown of client record, including the history of data and PII.
- Lockdown of client record to an individual agency:
  - Please list the agency: \_\_\_\_\_
- Rescinding of all CNYHMIS ROIs that are active in the system by multiple providers.
- Other (please explain): \_\_\_\_\_

\_\_\_\_\_  
Client Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency Witness

\_\_\_\_\_  
Date

Date Review needed (please select one) \_\_\_ 30 days \_\_\_ 60 days \_\_\_ 90 days \_\_\_ 180 days \_\_\_ 1 year

E-mail this form to [hmis@hhccny.org](mailto:hmis@hhccny.org)

Or mail it to Housing and Homeless Coalition, 580 South Salina Street, Syracuse, NY 13202

HHC use only: HHC Staff Person receiving request \_\_\_\_\_

Date received: \_\_\_\_\_ Date completed: \_\_\_\_\_ Review Date: \_\_\_\_\_

\_\_\_\_\_