

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



**The Housing & Homeless Coalition of Central New York**

**United Way of Central New York  
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Syracuse, NY 13202**

*Effective: October 1, 2010*

*Revised: October 1, 2025*

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### **Introduction:**

The Housing and Homeless Coalition of Central New York (HHC), through a United States Department of Housing and Urban Development (HUD) contract supported by the Continuum of Care (CoC) NY-510 with United Way of Central New York (UWCNY) as the CoC Collaborative Applicant and HMIS Lead, administers the Central New York Homeless Management Information System (CNY HMIS). The project utilizes Internet-based technology to assist homeless service and public service organizations across the CoC to capture information about the clients that they serve. The HMIS Administrator provides technology, training and technical assistance to users of the system throughout Onondaga, Oswego, & Cayuga Counties. The goal of CNY HMIS is to inform public policy about the extent and nature of homelessness in the CoC and as a tool for other public service organizations to complete Outcome Based Performance Measures reporting. This is accomplished through analysis and release of data that are grounded in the actual experiences of homeless and at-risk persons and the service providers who assist them throughout the CoC. Information that is gathered through intakes, conducted by service providers with consumers, is analyzed for an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives.

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

### **Benefits for Case Managers and Clients:**

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

### **Benefits for Agency and Program Managers:**

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

### **Benefits for Community-wide Continua of Care and Policymakers:**

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

### **Governing Principles:**

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

**Data Integrity:**

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

**Access to Client Records:**

The Client Records Access Policy is designed to protect against the recording of information in unauthorized locations or systems. Only staff who work directly with clients or who have administrative responsibilities will receive authorization to look at, enter, or edit client records. Additional privacy protection policies include:

- Except as permitted by State law or regulations, no client records will be shared electronically with another agency without written consent.
- Client has the right to not answer any question unless entry into a service program requires it.
- Client has the right to know who has added to, deleted from, or edited their client record.
- Client information transferred from one authorized location to another over the web is transmitted through a secure encrypted connection.

**Application Software:**

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

**Computer Crime:**

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

**End User Ethics:**

Any action taken with a specific intent that adversely affects the resources of any participating organization or institution or employees is prohibited. Any action taken with a specific intent that adversely affects any individual is prohibited. Users are prohibited to use CNY HMIS computing resources for personal purposes. Users must not attempt to gain physical or logical access to data or systems for which they are not authorized. 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 ServicePoint.
- House the HMIS database central server and limits Provider Agencies' access to the HMIS database.

- Located at 333 Texas Street, Suite 300, Shreveport, Louisiana 71101.

ServicePoint:

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

HMIS Lead Agency:

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

HMIS Staff:

- 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 Governance Committee, who have the final decision for all Policies and Procedures regarding CNY HMIS.

Agency Staff:

- Participating Agency - any agency that receives federal funding or state for homeless services or any public service that is in need of performance-based outcome measures.
- Agency Executive Director - responsible for all agency staff that 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 are currently in HMIS, and if there are agencies who are in need of licenses when there are no licenses available, the agency can then pay for HMIS access. These agencies will enter into an MOU with The United Way of Central NY, and these costs are determined by the HMIS Vendor WellSky, Inc.

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 Agreement. (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 and the NY-510 Governance Committee.

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

- HHC HMIS Administrator
- HHC 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 ServicePoint (WellSky as the HMIS vendor); the CoC has assigned UWCNY as the designated HMIS lead agency and below are the listed responsibilities and duties which include:

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

The HMIS Data Administrator Committee and the Lived Experience Boards shall make initial recommendations for changes of all policies and procedures by which CNY HMIS is governed and shall receive final approval from The NY-510 Governance 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 NY-510 Governance Committee will conduct HMIS user Evaluations including evaluating completeness and determining whether a new applicant (Project/ Agency) should receive HMIS access/ license.
- The CNY HMIS Data Administrator 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 (ServicePoint) 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 ServicePoint software. The Executive Director/Designated Director shall establish and monitor agency procedures that meet the criteria for access to ServicePoint software, as detailed in the policies outlined in this document. The Executive Director/Designated Director will ensure that the Agency and its staff fully comply with 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 ServicePoint software to staff who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities.

Each Agency must ensure that each user of the software and system obtains a unique user license. Only those with a user license may access and use the software and system. Sharing of usernames and passwords is expressly forbidden. In addition, each user of the software and system must agree to 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 ServicePoint software system including review of the policies in this document and any agency policies which impact the security and integrity of client information.
- Ensuring that access to the ServicePoint software is granted to authorized staff members only after they have received training from a designated trainer.
- Notifying all users in their agency of interruptions in service
- The Agency Administrator is also responsible for 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/refreshers training is required.
- Run quarterly Audit Reports on all active End-Users and report any violations of an end user to the Agency Executive Director and the HMIS Administrator.

## 1.7 User

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

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

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

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

The Participating Agency will designate the end users and communicate the end user's name and level of access to the HMIS Administrator before the user can begin using the system. 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 NY-510 Governance 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)
- 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.
- 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** - ServicePoint provides a resource directory component that tracks service referrals for clients. Each Participating Agency must compile a list of referral agencies, services provided, and a service area, and verify that the information has been entered into the Admin Provider section of ServicePoint. This is to be updated, at a minimum, yearly.
- **Timeliness Policy** - Agencies must create an internal mechanism that ensures client level data is entered in a timely manner. A timely manner shall be defined as within 7 days (1 week) of initial contact with the client. This policy shall affect the HUD Minimum and Program Specific Data Elements. There is a higher standard for the Entry/Exit and Shelter Point Processes.
- **Entry/Exit and Shelter Point Policy** - All Participating Agencies shall utilize the Entry/Exit process for every client entered into CNY HMIS. Additionally, every Participating Agency that has an Emergency Shelter housing component must utilize ShelterPoint. These two processes are integral to timely and accurate reporting and shall be completed within twenty-four (24) hours of the beginning or 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 will be required to pay the costs of the license, at the cost determined by the vendor of HMIS, Wellsky will enter into a MOU directly with the United Way of Central NY. 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 pay for 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>. If an agency has an active MOU and wishes to purchase more licenses, they can add more licenses to their agreement at any time during the year, however they cannot remove any licenses until the end of the contract year.

## 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 V) to clients about the usage of CNY HMIS. Participating Agencies are also required to use either Implied Consent or written Client Consent Forms when information is to be entered within CNY HMIS.

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

- **Description of ServicePoint:** a web-based information system that homeless and public service agencies across the state use to capture information about the persons they serve
- Why the agency uses it, to understand their clients' needs and help the programs plan to have appropriate resources for the people they serve, and to inform public policy.
- **Who Has Access** - Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records
- No information will be released to another agency without written consent
- **Right of Refusal** - Client has the right to not answer any question, unless entry into a program requires it; Client has the right to know who has added to, deleted, or edited their Service Point record; Information that is transferred over the web is through a secure, encrypted connection
- Each Client 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.
- 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.
- 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
- **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 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 Tompkins County Coordinated Entry Provider. All projects that operate and enter data into a comparable database, or housing projects that take referrals from Victim Service Providers (VSP) from 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 NY-510's Strategic Plan to end homelessness.**

## **2.14 HMIS Monitoring**

**Policy:** United Way 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 is not allowed to use Internet Cafes, Libraries, Airport Wi-Fi or other non-secure internet connections. Agency Privacy Policy must have a plan for remote access if staff will be using HMIS outside of the office such as doing 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 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 ServicePoint (HMIS System) must attend a New User Training. Users **must** receive ServicePoint 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, Homeless Prevention and 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 HMIS Administrator Committee, and approved by the Executive Committee of the CoC 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 ServicePoint.
- The HMIS Administrator will create all usernames. If a conflict exists beyond this naming convention, the HMIS Administrator will deal with it on a case-by-case basis.
- Passwords are automatically generated from the system when a user is created. The HMIS Administrator will securely communicate the system-generated password to the user. The password and usemane 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 ServicePoint system. These levels should be reflective of the access a user has to client level paper records and access levels should be need-based. Need exists only for those shelter staff, volunteers, or designated personnel who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities.

Access Levels are as follows:

- System Administrator I & II
- Agency Administrator
- Case Manager II
- Read Only I
- 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 ServicePoint software system which can restrict agencies from viewing each other's data.
- **Raw Data:** Users who have been granted access to the ServicePoint Report Writer tool can download and save client level data onto their local computer. Once this information has been downloaded from the ServicePoint server in raw format to an agency's computer, this data then becomes the responsibility of the agency. A participating Agency should develop protocol regarding the handling of data downloaded from the Report Writer.
- **Agency Policies Restricting Access to Data:** The Participating Agencies must establish internal access to data protocols. These policies should include who has access, for what purpose, and how they can transmit this information. Issues to be addressed include storage, transmission, and disposal of this data.
- **Data Sharing for Care Coordination:** Non-HMIS Participating Agencies can request and sign a Data Sharing Agreement regarding their participation in care coordination workgroups around vulnerable populations. These workgroups could 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 a 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.

### 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 Governance Committee 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 Governance Committee for review. The Governance Committee will at that point vote to overturn the sanction issued 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.

**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 Governance Committee for review. The Governance 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 proper HMIS operation, 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**

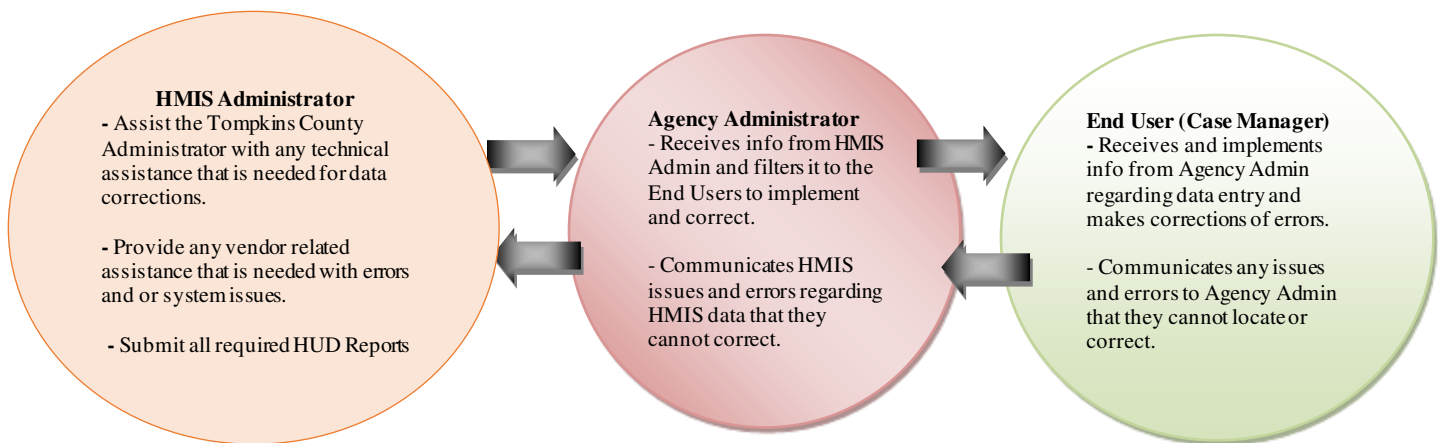
**Policy:** The HMIS Administrator shall respond to requests for services.

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.
- Participation of the CoC in Data Warehousing or Research activities will go through the HHC Staff, and if needed, the NY-510 Governance 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 Governance Committee 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.”

# 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. Catholic Charities of Tompkins-Tioga County**
- 2. Family and Children's Services, Inc.**
- 3. Human Services Coalition**
- 4. Lakeview Mental Health Services**
- 5. NY Law – Legal Assistance of Western New York, Inc.**
- 6. Opportunities, Access and Resources (OA) Housing LLC**
- 7. Reach Medical, Inc.**
- 8. St. John's Community Services**
- 9. Tompkins County Community Action Agency**
- 10. Second Wind Cottages**
- 11. Soldier On**
- 12. Tompkins Count Department of Social Services**
- 13. Tompkins County Learning Web**
- 14. Tompkins County Red Cross**
- 15. Veteran Administration**
- 16. Village at Ithaca, Inc.**

#### **Retired Agencies in HMIS**

Rescue Mission – Tompkins County