

# **HMIS Policies and Procedures Manual**

## Butte Countywide Homeless Continuum of Care

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Adopted April 20, 2015;  
Latest revision adopted November 16, 2020

For use by the CoC Council, CoC Coordinator, HMIS Committee, HMIS Lead Agency, HMIS Software System Provider, Contributing HMIS Organizations, Partner Agencies, and all End Users

## Revision History

Date Adopted	Version	Description of Changes	Approver
Apr 20, 2015	1.0	Initial document creation	CoC Council
Aug 22, 2016	1.1	Grammatik and formatting updates, omitted section on “Hidden/Closed Client Records”, clarified “Aggregate Data Release Criteria”	
Nov 5, 2018	1.2	Added definition of “at risk of chronic homeless” for No Place Like Home programs.	HMIS Committee
June 10, 2019	2.0	Added Change Management Plan, added Revision History page, added header to all pages, and minor formatting	HMIS Committee
November 16, 2020	3.0	Updated Data Quality Plan, Security Plan, and Privacy Plan. Update Roles and Responsibilities to reflect best practices.	CoC Council

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Primary reason for change
Update Data Quality Plan, Security Plan, and Privacy Plan. Update Roles and Responsibilities to reflect best practices.

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## I. Background

The U.S. Department of Housing and Urban Development (“HUD”) uses Homeless Management Information System (“HMIS”) data to inform homeless policy at the federal, state, and local levels. The HEARTH Act, enacted in 2009, requires that all recipients and sub-recipients of Continuum of Care (“CoC”) Program and Emergency Solutions Grant (“ESG”) funds participate in their CoC’s HMIS. The CoC Interim Rule (24 CFR 578) defines CoC HMIS responsibilities, including:

1. Selecting an HMIS software solution
2. Designating an eligible applicant to manage the HMIS (the “HMIS Lead Agency”)
3. Providing oversight for key HMIS policies
4. Working with the HMIS Lead Agency to ensure consistent provider participation
5. Ensuring the quality of HMIS data

In addition, the HMIS Proposed Rule (76 FR 22 76917) includes more specific HMIS requirements, including: the duties of the CoC; the duties of the HMIS Lead Agency; and security, data quality, privacy and technical standards.

With the Exception of Victim Service Providers defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA), all homeless assistance programs that are a part of the Continuum of Care must participate in the HMIS, whether or not the specific program receives direct funding from HUD or other federal agencies. A particular program (or part of a program, such as a subset of beds within a program) is considered “participating” in HMIS if, as a matter of general practice, the program makes reasonable efforts to record all the Universal Data Elements for all clients served and discloses these data elements to the HMIS Lead Agency at least once annually. Disclosure may occur by directly entering data in the HMIS, electronically transferring data to the HMIS Lead Agency, or through other means determined with the HMIS Lead Agency. Such an HMIS participant is called a “Contributory HMIS Organization (“CHO”)” in these HMIS Policies & Procedures.

The Butte Countywide Homeless Continuum of Care (“Butte CoC”) Governance Charter, adopted by the Butte CoC Council, requires that the Butte CoC designate a legal entity that is also a Continuum of Care Program eligible applicant to serve as the Homeless Management Information System (HMIS) Lead Agency. The HMIS Lead Agency maintains Butte County’s HMIS in compliance with HUD standards and coordinates all related activities, including training, maintenance and the provision of technical assistance to CHOs. More specific HMIS Lead Agency responsibilities are described in the HMIS Lead Agency Memorandum of Understanding (the “HMIS Lead Agency MOU”) between Butte County Department of Employment and Social Services (DESS) and the Butte CoC.

The Butte CoC *HMIS Policies and Procedures Manual* was created to outline how the Butte CoC will comply with the following regulations, standards and agreements: the HEARTH Act; CoC Interim Rule; HMIS Proposed Rule; HUD Data Standards (2014 HMIS Data Dictionary and 2014 HMIS Data Manual); Butte CoC Governance Charter; and HMIS Lead Agency MOU.

## II. Definition of Terms

**APR:** Annual Performance Report

**Butte CoC Council:** The Butte CoC's governing body charged by the Butte CoC Governance Charter with planning and implementing HUD-funded efforts to end homelessness in Butte County

**Butte CoC Governance Charter:** The document that governs the roles, responsibilities and operations of the Butte CoC, Council, Committees, Lead Agency, Collaborative Applicant, and HMIS Lead Agency

**CHO (Contributory HMIS Organization):** An organization that enters data into the HMIS Software System in compliance with the CHO Participation Agreement and under the oversight of a CHO HMIS Administrator

**CHO HMIS Administrator:** A CHO staff person who is responsible for compliance with the CHO Participation Agreement and day-to-day operation of CHO data collection in HMIS

**CHO Participation Agreement:** An agreement entered into by the HMIS Lead Agency and CHO that describes the obligations and authority of the parties with regard to data collection, input, management and reporting

**Client:** A living individual about whom an Agency collects or maintains PII

**CoC:** Continuum of Care

**End User:** An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data into the HMIS Software System or another administrative database from which data are periodically uploaded to the HMIS

**HIC:** Housing Inventory Chart

**HMIS:** Homeless Management Information System

**HMIS Committee:** Committee established by the Butte CoC Council to provide support and recommendations to the Butte CoC Council regarding HMIS policies and procedures; composed of staff representing the Butte CoC and HMIS Lead Agency, and all CHO HMIS Administrators

**HMIS Software System:** An HMIS data management software program developed and serviced by an HMIS Vendor

**HMIS Lead Agency:** An organization designated by a CoC to operate the CoC's HMIS

**HMIS Vendor:** Contractor who provides support services for the operation of a CoC's HMIS by contract, including the HMIS Software System provider, web server host, as well as providers of other contracted information technology or support

**HUD:** U.S. Department of Housing and Urban Development

**LSA:** Longitudinal System Analysis

**NOFA:** Notice of Funding Availability

**PPI:** Protected Personal Information

**PIT:** Point in Time Count

**Security Officer:** A staff person within the HMIS Lead Agency, and each CHO, that is responsible for their agency's compliance with the Security Plan of this *HMIS Policies and Procedures Manual*.

### **III. Roles and Responsibilities**

#### **1. Butte CoC Council**

The Butte CoC Council is responsible for HMIS Project oversight and implementation, which encompasses planning, administration, software use, managing HMIS Data in compliance with HUD HMIS Standards, and reviewing and approving all policies, procedures, and data management plans governing CHOs. More specific Butte CoC Council responsibilities are listed below.

- Designate a single information system as the official HMIS software for the geographic area.
- Designate an HMIS Lead.
- Approve all HMIS policies, procedures and operational agreements.
- Develop a Governance Charter which includes a requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (CHO) and such additional requirements as may be issued by notice from time to time.

#### **2. HMIS Committee**

The HMIS Committee is designated by the Butte CoC Council to provide support and recommendations to the Butte CoC Council related to the HMIS regulations and standards as set forth by HUD. The HMIS Committee consists of staff representing the Butte CoC and HMIS Lead Agency, and all CHO HMIS Administrators.

#### **3. HMIS Lead Agency**

The HMIS Lead Agency manages HMIS data in compliance with HUD HMIS Standards, collects and organizes HMIS data within a data management software program and provides HMIS administrative functions at the direction of the Butte CoC Council, and as further described in the HMIS Lead Agency MOU. Other principle responsibilities include:

##### **Governance, Policy Development and Reporting**

- a) Draft policies, procedures and standards in accordance with the CoC Interim Rule, Proposed HMIS Rule, and 2014 HUD HMIS Data Standards;
- b) Submit a security plan, data quality plan, and a privacy policy to the CoC for approval, to be updated as needed;
- c) Ensure implementation of policies, procedures and standards;
- d) Schedule and facilitate HMIS Committee meetings;
- e) Prepare the following data reports and analyses for review by the Butte CoC Council and for submission to HUD: PIT Count; LSA; HIC; unduplicated counts of clients served annually;

count of lodging units in the HMIS; and other reports as necessary to measure progress in meeting Butte CoC goals;

- f) Respond to CoC Council and HMIS Committee directives;
- g) Ensure participation by all programs serving homeless people in the HMIS;

#### **System Administration and Security**

- h) Serve as the applicant to HUD for grant funds to be used for HMIS activities in the CoC's geographic area, and enter into grant agreements with HUD to carry out HUD-approved activities, as further described in the HMIS Lead Agency MOU;
- i) Oversee the day-to-day administration of the HMIS;
- j) Manage the HMIS Software System Vendor and other HMIS Vendors in compliance with current HUD requirements and Proposed HMIS Rule technical standards;
- k) Retain copies of all contracts and agreements executed for HMIS administration;
- l) Designate a Security Officer responsible for ensuring compliance with applicable security standards, after conducting a criminal background check;
- m) Require persons with access to all HMIS records to undergo a background check;
- n) Keep all signed paper and electronic statements for a period of at least 3 years;
- o) Implement a policy and chain of communication for reporting and responding to security incidents;
- p) Develop a disaster recovery plan, which includes protocols for communication with staff, CoC and CHOs;
- q) Complete an annual security review;

#### **CHO and End User Coordination**

- r) Monitor and enforce compliance by all CHOs with HUD requirements and report on compliance to the CoC and HUD;
- s) Communicate HUD HMIS Standards updates to all CHO HMIS Administrators;
- t) Prepare and execute Participation Agreements with each CHO, which include:
  - a. The obligations and authority of the HMIS Lead Agency and CHO;
  - b. The requirements of the Security Plan with which the CHO must abide;
  - c. The sanctions for violating the Participation Agreement; and
  - d. Agreement that the HMIS Lead Agency and CHO will process Protected Identifying Information consistent with the agreement.
- u) Maintain contact list of all CHO HMIS Administrators and update CHO Participation Agreements as needed;
- v) Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from End Users and CHO HMIS Administrators.
- w) Document technical issues experienced by End Users;

#### **Training and Technical Assistance**

- x) Develop and deliver a comprehensive training curriculum and protocol for CHO HMIS Administrators and End Users, as further described in the HMIS Lead Agency MOU;
- y) Provide technical assistance and support to CHO HMIS Administrators and End Users;

#### **Data Quality**

- z) Develop and implement the Data Quality Plan;
- aa) Establish data quality benchmarks for CHOs (calculated separately for: emergency shelter, safe haven, transitional housing and permanent housing), including bed coverage rates, service-volume coverage rates, missing/unknown value rates, timeliness criteria, and consistency criteria;
- bb) Coordinate with CHO HMIS Administrators to produce required reports;

- bb) Run and disseminate data quality reports on a quarterly basis to CHO programs indicating levels of data entry completion, consistency with program model, and timeliness;
- cc) Provide quarterly reports on HMIS participation rates, data quality and other analyses to the Butte CoC Council and HMIS Committee;
- dd) Monitor compliance by all CHOs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review per the process outlined in the Participation Agreement;
- ee) Manage HMIS Software System upgrades and ensure that they comply with the latest HUD Data Standards; and
- ff) Distribute HUD Data Standards and provide guidance to CHOs on compliance.

#### **4. Contributing HMIS Organizations (CHOs)**

CHOs operate a provider program and contribute Protected Identifying Information to the HMIS Software System. CHOs must enter into and comply with CHO Participation Agreements in order to contribute such data to the HMIS Software System. Principle responsibilities described in this *HMIS Policies & Procedures Manual* include:

##### **Data Quality**

- a) Collect the universal data elements, as defined by HUD, for all programs operated that primarily serve persons who are homeless or at risk of homelessness;
- b) Collect program specific data elements, as defined by HUD, for all clients served by programs funded by HUD grants allocated to the Butte CoC;
- c) Enter client-level data into the HMIS within seven days of client interaction;
- d) Follow, comply and enforce the CHO Participation Agreement;

##### **Security**

- e) Designate the HMIS Administrator as the Security Officer that is responsible for ensuring Security Plan compliance for the CHO;
- f) Conduct criminal background checks, at a minimum based on a record review of the Superior Court records in the county of last residence, on the HMIS Administrator and all End Users;
- g) Ensure that all End Users receive security training prior to being given access to the HMIS, and once annually;

##### **Privacy**

- h) Uphold confidentiality requirements;
- i) Post the Butte Countywide HMIS Public Notice so that is viewable to all Clients;
- j) Post the Butte Countywide Continuum of Care Privacy Notice on its Agency's website; and

##### **Training**

- k) Participate in comprehensive training curriculum developed by the HMIS Lead Agency.

#### **5. CHO HMIS Administrator**

A CHO HMIS Administrator is designated by each CHO to oversee day-to-day operation of its HMIS data collection system, ensure program-level data quality according to the terms of the CHO Participation Agreement and associated Data Quality Plan, and manage data entry into the HMIS Software System. The CHO HMIS Administrator shall participate in HMIS Committee meetings and HMIS trainings. The

CHO HMIS Administrator shall:

- a) Be the first point of contact for End Users experiencing difficulties using HMIS;
- b) Maintain End User list within the CHO;
- c) Monitor End User logins on a monthly basis;
- d) Complete data entry when End Users are unable to complete data entry;
- e) Ensure CHO compliance with the protocols of the Data Quality Plan, Security Plan and Privacy Plan;
- f) Inform the HMIS Lead Agency when critical deadlines regarding data entry are missed;
- g) Maintain communication with the HMIS Lead Agency and HMIS Committee regarding HMIS data entry challenges and questions;
- h) Submit requests for new End Users of the HMIS Software System to the HMIS Lead Agency;
- i) Notify the HMIS Lead Agency when End Users no longer need access to the HMIS, so their HMIS user accounts can be deactivated;
- j) Complete training with the HMIS Lead Agency at least quarterly.

## **6. HMIS Software System Vendor**

The HMIS Software System Provider licenses and manages the HMIS software used by the Butte CoC by contract. The Butte CoC also requires the HMIS Software System Provider to:

- a) Support the HMIS Lead Agency in providing training and technical assistance to the HMIS Lead Agency, CHO HMIS Administrators and End Users;
- b) Encrypt data at the server level; and
- c) Revise HMIS Software System Provider software at the HMIS Lead Agency's request in order to comply with HUD HMIS Standards.

## **7. End User**

All HMIS End Users shall:

- a) Read, initial and sign the CHO End User Agreement;
- b) Complete a New User training with the HMIS Lead Agency;
- c) Complete training with the HMIS Lead Agency at least annually;
- d) Maintain security of login and work station;
- e) Follow data entry standards as required in the Data Quality Plan regarding completeness and timeliness;
- f) Follow protocols as required by the Security Plan and Privacy Plan;
- g) Enter client-level data into the HMIS within seven days of client interaction;
- h) Notify CHO HMIS Administrator if data deadlines appear to be in jeopardy; and
- i) Notify CHO HMIS Administrator with any questions, or if the HMIS Software System is not working properly.

# **IV. Data Quality Plan**

## **1. Definition of Data Quality**

Data quality refers to the extent that data recorded in the Butte CoC HMIS accurately reflects the same information in the real world. A perfect overlap between data and reality would result in a hypothetical data quality rating of 100%. While no data collection system has a quality rating of 100%, it is critical

that the system provides the best possible representation of reality as it relates to homeless people and the programs that serve them. The overall goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent and impact of homelessness. All data entered into the HMIS Software System must comply with HUD's 2014 HMIS Data Standards.

One of the most effective ways to collect quality data is to develop data collection and data entry standards that are consistently implemented by all organizations and users entering data into the HMIS Software System. These standards will ensure that data is entered in a timely and consistent manner throughout the Butte CoC. The procedures and standards described below apply to all CHOs and End Users. CHO HMIS Administrators are responsible for ensuring that their organization's staff adheres to these procedures and standards.

## **2. Data Collection**

**Data Elements** - Data Elements are the specific pieces of information that CHOs collect from clients and enter into the HMIS Software System. HUD's 2014 HMIS Data Standards (as defined in the HUD Data Standards Manual, Data Dictionary and HMIS Project Descriptor Data Elements Manual) govern the collection and input of Data Elements. The HMIS Lead Agency, CHOs and End Users must adhere to HUD's 2014 HMIS Data Standards. HUD may revise these standards from time to time in the future, at which point this *HMIS Policies and Procedures Manual* will need to be updated. Reference to HUD 2014 HMIS Data Standard guidance documents are provided in Section VIII Resources at the end of this *HMIS Policies and Procedures Manual*.

There are two Data Element categories— Universal and Program Specific. Universal Data Elements must be entered for all clients, regardless of funding source. Unlike Universal Data Elements, HUD does not require that all Program Specific Data Elements be collected for each client. Each CoC determines which Program Specific Data Elements to collect. The Universal Data Elements and Program Specific Data Elements are described in the 2014 Data Standards Manual, including data collection instructions, data element fields and response category descriptions.

**Unique Client Identifier** - A unique client identifier will be assigned by the HMIS to each client. The unique client identifier will not contain, in whole or in part, any client personal information as listed under Universal Data Elements. The unique client identifier provides an unduplicated internal count of clients served by CHOs, and provides the HMIS Lead Agency and HMIS Committee the means of conducting longitudinal analysis of services provided to each client.

## **3. Data Timeliness**

Universal Data Elements, as defined by HUD's 2014 HMIS Data Standards, should be collected by CHOs from all Clients at initial program enrollment. CHOs must enter data into the HMIS Software System within seven days of collecting the Client data elements. Program exit data should be entered on the same business day as exit. CHOs must enter data on all contacts made, including date of engagement in outreach services, and dates of enrollment for specific programs.

## 4. Data Accuracy

Data accuracy is almost wholly dependent on the End User entering the correct information. In some cases, consistency checks can catch these errors. But for the most part, it is the responsibility of the End User to ensure that what is entered into the HMIS Software System reflects reality.

In addition to unintentional errors, the possibility of the Client providing false information always exists. It is impossible to completely eliminate all instances of intentionally false information. There are certain strategies to build trust and emphasize the benefits of accurate data to Clients. A firm understanding of why a Client might provide false information, along with communicating to them the benefits of complete and accurate information, is a good start.

Reasons for providing false information:

- Privacy (not wanting to be tracked)
- Embarrassment/modesty
- A disability that results in paranoia
- Desire to qualify for service
- Fear of being turned away
- Not caring

Reasons for providing true information:

- Improved direct services
- Benefit eligibility and information validated
- Want to tell their story
- A relationship has been created
- Understand privacy/security procedures
- See benefits of HMIS for homelessness

End Users should attempt to assuage any Client anxiety about providing information by explaining how their PII is protected within the HMIS Software System.

## 5. De-Duplication Procedures

The HMIS Software System software will use the following data elements to create de-duplicated Client records:

- Name (first, middle, last, suffix, aliases or nicknames should be avoided);
- Social Security Number;
- Date of Birth (actual or estimated);
- Race and Ethnicity;
- Gender;
- Veteran's status; and
- Family status.

The primary way to achieve de-duplication will be a user-mediated search of the Client database prior to creating a new Client record. The End User will be prompted to enter a minimum number of the data elements into the HMIS application and a list of similar Client records will be displayed. Based on the results, the End User will be asked to select a matching record if the other identifying fields match correctly. If the End User is unsure of a match (either because some data elements differ or because of

blank information), the End User should query the Client for more information and continue evaluating possible matches or create a new Client record.

## 6. Data Validity

For the purposes of this Data Quality Plan, Data Validity refers to all End Users defining and interpreting data elements the same way. The HMIS Committee reviews the definitions for each data element during training and these definitions and any updates are discussed at End User training meetings. If any End User has a question regarding how to define or interpret a data element they should feel free to contact the HMIS Lead Agency for direction. Some of the more frequently misinterpreted data elements and response categories are explored below.

Veterans – Adults (18 years or older) who have served active duty in any branch of the military. This includes the National Guard, but only if they were called up for active duty. Era of service, duration of service, discharge status, etc. is required for programs that serve Veterans only.

Chronically Homeless - An unaccompanied homeless individual with a disabling condition or an adult member of a homeless family who has a disabling condition and who has either been continuously homeless for 1 year or more, OR has had at least four episodes of homelessness in the past 3 years.

At Risk of Chronic Homelessness - (No Place Like Home (NPLH))

Persons qualifying under this definition are persons who are at high-risk of long-term or intermittent homelessness. For the NPLH Program, this means an adult or older adult with a Serious Mental Disorder who meet one or more of the following criteria: (1) Persons exiting institutionalized settings, such as jail or prison, hospitals, institutes of mental disease, nursing facilities, or long-term residential substance use disorder treatment, who were *Homeless prior to admission* to the institutional setting; (2) Transition-Age Youth experiencing homelessness or with significant barriers to housing stability, including, but not limited to, one or more evictions or episodes of homelessness, and a history of foster care or involvement with the juvenile justice system; (3) Persons, including Transition-Age Youth, who prior to entering into one of the facilities or types of institutional care listed below had a *history of being Homeless* as defined under this subsection: a state hospital, hospital behavioral health unit, hospital emergency room, institute for mental disease, psychiatric health facility, mental health rehabilitation center, skilled nursing facility, developmental center, residential treatment program, residential care facility, community crisis center, board and care facility, prison, parole, jail or juvenile detention facility, or foster care.

***Having a history of being Homeless*** means, at a minimum, one or more episodes of homelessness in the 12 months prior to entering one of the facilities listed above. As long as the requirements listed above are met, Homeless Persons who have resided in one or more of the settings described above in section 1 or section 3 for any length of time may qualify as Homeless upon exit from the facility, regardless of the amount of time spent in such facility; and Homeless Persons who prior to entry into any of the facilities or types of institutional care listed above have resided in any kind of publicly or privately operated temporary housing, including congregate shelters, transitional, interim, or bridge housing, or hotels or motels, may qualify as At-Risk of Chronic Homelessness.

Literally Homeless – An individual or family who lacks a fixed, regular and adequate nighttime residence, meaning the individual or family has a primary nighttime residence that is a public or private place not meant for human habitation or is living in a publicly or privately operated shelter designed to provide temporary living arrangements. This category also includes individuals who are exiting an institution where he or she resided for 90 days or less who resided in an emergency shelter or place not meant for human habitation immediately prior to entry into the institution.

Imminent Risk of Homelessness – an individual or family who will imminently lose (within 14 days) their primary nighttime residence provided that no subsequent residence has been identified and the individual or family lacks the resources or support networks needed to obtain other permanent housing.

Housing Needed to Resolve Homelessness – This element refers to what the client will need to become stably housed in the long term. If their homelessness was caused by a short-term gap in employment, then an emergency shelter stay until their income is re-established may be the correct response. If a client's barriers are more severe, on-going rental assistance or permanent supportive housing may be the correct choice.

## **V. Security Plan**

The Butte Countywide Continuum of Care Security Plan specifically details Uses and Disclosures of Protected Personal Information (PPI). This Security Plan applies to all Partner Agencies within the Butte Countywide HMIS. When other federal or state privacy or security laws apply to an organization, the organization must comply with the requirements that provide the greatest protection for the client's PPI. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

### **1. Hardware, Connectivity and Computer Security**

Partner Agencies must have Internet connectivity for each workstation accessing the HMIS. To optimize performance, all agencies are encouraged to secure a high speed Internet connection with a cable modem, DSL, or T1 line. Agencies expecting a very low volume of data may be able to connect using a dial-up connection; however, HMIS management cannot guarantee satisfactory performance with this option.

Access to the HMIS will only be allowed from computers and portable computing devices as specifically identified by the CHO's Executive Director (ED), Chief Executive Officer (CEO), or equivalent, and the CHO HMIS Administrator. Access to these workstations will be controlled through both physical security measures and a password. Each agency's CHO HMIS Administrator will determine the physical access controls appropriate for their organizational setting based on HMIS security policies, standards and guidelines.

All computers stationed in public areas that are used to collect and store HMIS data should be staffed at all times. When workstations are not in use and staff is not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals. Each computer must have password-protected screen savers. In addition, each workstation, where information access occurs, must have anti-virus and anti-spyware programs in use and properly maintained with timely installation of all critical updates to the operating system, web-browsers, and AV/AS software. Good examples of anti-virus software include McAfee and Symantec (Norton) Security systems, among others.

### **2. HMIS Lead Agency Implementation**

Prior to setting up a new CHO to use the HMIS Software System, the HMIS Lead Agency shall:

- a) Verify that the required documentation has been correctly executed and submitted or viewed on-site, including:
  - Executed CHO Participation Agreement;
  - Designation of a CHO HMIS Administrator who will also serve as the Security Officer that is responsible for ensuring Security Plan compliance for the CHO;
- b) Request and receive approval from the HMIS Committee to setup a new agency;

- c) Provide initial training to the CHO HMIS Administrator and CHO End Users and
- d) Work with the CHO HMIS Administrator to input applicable agency and program information.

### 3. CHO Implementation

At a minimum, CHOs must develop rules, protocols or procedures to address the following:

- Posting the Butte Countywide HMIS Public Notice in locations where HMIS data is collected so that it is viewable to all Clients;
- Complying with the Butte Countywide Continuum of Care Privacy Notice the CHO Participation Agreement, the *HMIS Policies and Procedures Manual*, federal HMIS regulations, and HUD Standards;
- Maintaining and posting an updated copy of the Butte Countywide Continuum of Care Privacy Notice on the agency's website;
- Providing copies of the Butte Countywide Continuum of Care Privacy Notice to Clients, upon request;
- Appropriate assignment of End User accounts;
- Preventing End User account sharing;
- Protection of unattended workstations;
- Protection of physical access to workstations where employees are accessing HMIS;
- Safe storage and protected access to hardcopy and digitally generated client records and reports with identifiable client information;
- Proper cleansing of equipment prior to transfer or disposal; and
- Procedures for regularly auditing compliance with the *HMIS Policies and Procedures Manual*.

### 4. End User Implementation

**Eligible End Users** - Each CHO shall only authorize HMIS use to End Users who need access to the system for data entry and/or system administration purposes. Data entry includes entering client records, editing client records, viewing client records, or other essential activity associated with carrying out CHO Participation Agreement responsibilities. System administration includes items such as technical administration of the system, report writing, data analysis and report generation, and other essential activity associated with carrying out CHO Participation Agreement responsibilities.

**Setting Up New End Users** - If the CHO authorizes system use for a new End User, the CHO's HMIS Administrator shall:

- a) Review internal HMIS records about previous End Users to ensure that the new End User does not have previous violations of HMIS Policy and Procedure that prohibit access;
- b) Contact the HMIS Lead Agency to request an End User Agreement for the new End User;
- c) Have the new End User read, initial and sign the End User Agreement;
- d) Prepare a letter on Agency letterhead verifying a criminal background check has been completed on the new End User (letter must include the new End User's name, the date the criminal background check was completed, and be signed by the Agency's ED, CEO, or equivalent); and
- e) Forward the executed End User Agreement and verification of criminal background check to the HMIS Lead Agency.

The HMIS Lead Agency shall:

- a) Create the new End User account in the HMIS Software System;
- b) Contact the new End User to set up a New User Training;
- c) Provide the new End User with their HMIS Software System log in credentials at the time of the New User Training; and
- d) Manage End User accounts for the CHO, including removal of an End User's account access when it is no longer needed.

## **End User Requirements**

Prior to being granted a username and password, End Users must complete the following:

- a) Participate in a criminal background check;
- b) Sign an HMIS End User Agreement that acknowledges receipt of the HMIS Policies and Procedures Manual and pledges compliance;
- c) Receive New User training with the HMIS Lead Agency, which includes awareness of the sensitivity of client-level data and appropriate measures to prevent its unauthorized disclosure; and
- d) Receive a unique user name and password that is kept confidential.

## **Passwords**

Each End User will be assigned a User ID, preferably the first and last name of the user. A temporary password will be automatically generated by the system when a new End User is created. The HMIS Lead Agency will communicate the system-generated password to the End User. The End User must establish a new password upon initial login. This password will need to be changed every 90 days. Passwords should be between 8 and 16 characters long, contain at least two numbers, and should not be easily guessed or found in a dictionary. The password format is alphanumeric and is case-sensitive. End Users are prohibited from sharing passwords—even with supervisors. Sanctions will be imposed on the End User and/or CHO if End User account sharing occurs. Any passwords written down should be securely stored and inaccessible to others. They should not be saved on a personal computer. An End User may only attempt to enter his/her password four times before the system inactivates that End User account. An End User account can only be reactivated by the HMIS Lead Agency.

## **Password Reset**

If an End User has forgotten his/her password or for other reasons needs it to be changed, he/she must contact the HMIS Lead Agency by phone or email to request a new password. A password given by the HMIS Lead Agency is a temporary password and after entered once must be changed immediately by the End User.

## **Changes to End User Accounts**

Only the HMIS Lead Agency may make End User account changes. This includes adding or deleting an End User, changing passwords, and granting access to the Coordinated Entry Program in HMIS. . CHO HMIS Administrators should contact the HMIS Lead to request changes to an End User account.

## **5. System Inactivity**

End Users must logoff from the HMIS Software System and their workstation if they leave the

workstation. HUD requires password protected screen savers on each workstation. If the End User is logged onto a workstation and the period of inactivity on that workstation exceeds 30 minutes, the End User will be logged off the HMIS Software System automatically.

## 6. Electronic Data Control

CHOs must establish protocols limiting internal access to HMIS data based on HUD Data and Technical Standards.

**Raw Data** - End Users who have been granted access have the ability to download and save client level data onto their local computer. Once this information has been downloaded from the HMIS Software System in raw format to a CHO's computer, this data then becomes the responsibility of the CHO. Any such data files should be password protected with a reasonable level of encryption to safeguard personal and protected information.

**Ability to Export Agency Specific Data from HMIS** - CHOs will have the ability to export a copy of their own data for internal analysis and use. CHOs are responsible for the security of this information.

**Data Storage** - The HMIS Lead Agency and CHOs must store HMIS data for a minimum of seven years on a secure server.

## 7. Enforcement Mechanisms

The HMIS Lead Agency and/or HMIS Committee will investigate all potential violations of any security protocols. Any End User found to be in violation of security protocols will be sanctioned.

Sanctions include, but are not limited to:

- A formal letter of reprimand
- Suspension of HMIS system privileges
- Revocation of system privileges

A CHO's access may also be suspended or revoked if serious or repeated violation(s) of this *HMIS Policy and Procedures Manual*, as adopted by the Butte CoC, occur by the CHO's End Users.

# VI. Privacy Plan

The **Butte Countywide Continuum of Care Privacy Notice (Privacy Notice)** specifically details Uses and Disclosures of Protected Personal Information (PPI). This Privacy Notice applies to all Partner Agencies within the Butte Countywide HMIS. When other federal or state privacy or security laws apply to an organization, the organization must comply with the requirements that provide the greatest protection for the client's PPI. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

The **Butte Countywide HMIS Public Notice (Public Notice)** generally explains the reasons for collecting information in HMIS.

### 1. Client Notice

Each CHO must post the Public Notice in locations where HMIS data is being collected so that is

viewable to all Clients.

Each CHO must offer a copy of the Privacy Notice to Clients, and provide a copy upon request. If an agency maintains a public web page, the agency must post the Privacy Notice on its web page.

## 2. Client Consent

Consent of the Client for data collection in HMIS is inferred from the circumstances of the collection.

## 3. HMIS Data Uses and Disclosures

Once data is collected in HMIS, Partner Agencies have obligations about how that information is used and disclosed.

*Uses* are internal activities for which Partner Agencies interact with Client PPI.

*Disclosures* of PPI occur when Partner Agencies share Client PPI with external agencies.

HUD gives HMIS Partner Agencies the authority for the following uses and disclosures without the need to obtain Client consent as long as they are clearly articulated in the Butte Countywide CoC Privacy Notice. Uses and disclosures for the purpose of:

- Providing or coordinating services to an individual;
- Creating de-identified client records from PPI;
- Carrying out administrative functions (legal, audit, personnel, oversight and management functions); and
- Functions related to payment or reimbursement for services.

HMIS Partner Agencies are allowed (in some instances required) to disclose information in the following ways without Client consent, as long as they are clearly laid out in the Butte Countywide CoC Privacy Notice:

- Uses and disclosures required by law;
- Uses and disclosures to avert a serious threat to health or safety;
- Uses and disclosures about victims of abuse, neglect, or domestic violence;
- Uses and disclosures for research purposes; and
- Uses and disclosures for law enforcement purposes.

Uses and disclosures not listed in the Butte Countywide CoC Privacy Notice require the Client's consent.

**Unaccompanied Minor Youth** - The HMIS cannot be used to share information about unaccompanied minor youth outside of the originating agency. Thus, End Users cannot share any Client information of unaccompanied minor youth. For the purposes of this policy, minor youth are defined as youth under 18.

**Domestic Violence (DV) Service Providers** – DV Service Providers are prohibited from entering Client PPI into HMIS, and must use a comparable database.

## 4. Privacy Plan Compliance and Grievance Policy

CHOs must establish a regular process of training End Users on the Privacy Plan compliance and regularly audit that the Privacy Plan is being followed by CHO staff (including employees, volunteers,

affiliates, contractors and associates). CHOs must review any complaints about potential violations of the Privacy Policy.

## **VII. Change Management Plan**

### **1. Proposal and Monitoring**

- Proposal of a change must be made in the HMIS Committee by a Committee member, HMIS Lead agency, or HMIS System Administrator(s). Unless otherwise imposed by governing bodies for compliance, the HMIS Committee must agree to the proposal and further development of the change.
- The HMIS Committee takes responsibility for monitoring and setting criteria for methods and measures of success of a proposed change.

### **2. Analysis**

- The HMIS Committee will identify and analyze scope, impact, and risk of proposed change, and take into account external factors which may impact or affect change feasibility, system stability, functionality, security, data quality, and/or data integrity.
- Appropriate measures must be identified and taken to avoid, mitigate, and/or appropriately account for risk.

### **3. Development and Testing**

- The HMIS Committee will work with the HMIS Lead Agency and HMIS System Administrator(s) to translate the proposed change into system-specific software configurations.
- For non-software and procedural changes, HMIS Committee, HMIS Lead Agency, and HMIS System Administrator(s) will translate proposed change into applicable documentation, training, and/or resource materials.
- When issues arise that are counter to the desired intent or effect of the change, affect pre-existing functionality or impact system stability, these will be addressed in a revised plan prior to recommending for approval. Issues that challenge the feasibility of the change must be addressed with the HMIS Committee, Lead Agency, and HMIS System Administrator(s). The option to abandon a proposed change must be done prior to recommending for approval to the CoC Council, and must involve the HMIS Committee, HMIS Lead Agency, and HMIS System Administrator(s).
- Design and initial testing should first be done in a sandbox to limit risk of affecting production systems. Secondary and pilot testing can (but does not have to) take place on production systems in a limited way, with appropriate measures taken to limit unintended outcomes on the production system. Approval by the CoC Council (or ED/CEO/equivalent for agency-specific changes) is needed to proceed with further implementation.

### **4. Recommendation and Approval**

- The HMIS Committee, HMIS Lead Agency, and HMIS System Administrator(s) must review and appraise the proposed change, then recommend to the CoC Council for approval. Context, value, risk, and impact should be included in the recommendation to the CoC Council. After approval is given by the CoC Council, related documents are updated as needed.
- If the scope of the change is limited to and applies to only one Partner Agency, the approval of only the agency's ED, CEO, or equivalent is required.

## **5. Update Documentation**

- Upon approval to implement the proposed change, the applicable documents must be updated as necessary either prior or parallel to implementation. While not required, the updated documentation may be approved at the same time as the change by the CoC Council (or agency ED/CEO/equivalent, when applicable).
- In addition to the body of the documents being updated, these documents must have a revision date made clearly visible in a conspicuous part of the document and a running history of changes (aka Change Log) included in the document. This Change Log must display the date, version number (if versioning numbers are used), brief summary of change, approving body, author, reviewer, and a primary reason for change.

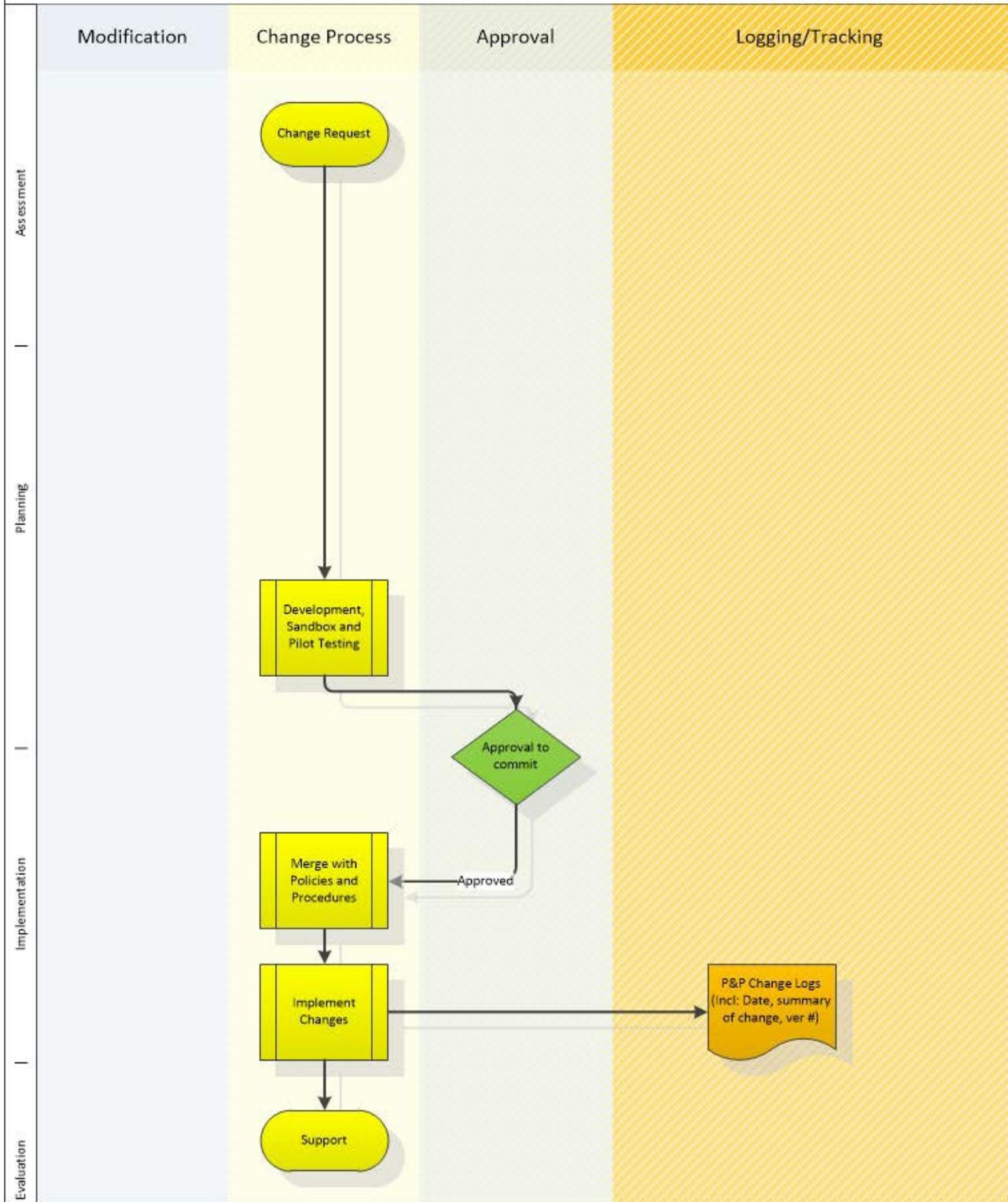
## **6. Schedule, Milestones, and Implementation**

- A project overview must be developed prior to or parallel to the design phase of proposed changes. The overview must include estimated dates for design completion, testing, planned outages, training, and go-live. Implementation must use a best-effort to reduce likelihood, scope, and duration of down-time.

## **7. Evaluation and Support**

- Post go-live/implementation must include appropriate support for changes. Support requests following implementation should also be included in post- implementation evaluations to identify both intended and unintended outcomes of the implemented change.

Change Management; incl. Planned Func. Development, Unexpected Issues, and Enhancements



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## VIII. Technical Standards

The HMIS Lead Agency will ensure that the HMIS Software System:

1. Contains fields for collection of all data elements established by HUD notice.
2. Record data from a theoretically limitless number of service transactions while following federal, state, territorial, or local data retention laws and ordinances.
3. Generates the report outputs specified by HUD, including representation of dates for all historical and transactional data elements.
4. Produces reports that enable the CHOs and HMIS Lead Agency to assess compliance with HUD data quality benchmarks.
5. Generates audit reports that allow the HMIS Lead Agency to review the audit logs on demand, including HUD data requirements.

## IX. Resources

### Regulations and Requirements

*HEARTH Act of 2009*, S. 896 (<https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/>)

*CoC Program Interim Rule*, 25 CFR Part 578  
(<https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>)

*HMIS Requirements Proposed Rule*, 76 FR 22 76917  
(<https://www.hudexchange.info/resource/1967/hearth-proposed-rule-for-hmis-requirements/>)

### HMIS Data Standards

*2004 HUD HMIS Data and Technical Standards*, U.S. Dept. of Housing and Urban Development  
<https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/>

*HMIS Data Standards Manual*, U.S. Dept. of Housing and Urban Development  
<https://www.hudexchange.info/resource/3826/hmis-data-standards-manual/>

*HMIS Data Dictionary*, U.S. Dept. of Housing and Urban Development  
<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

### Guides and Tools

*HMIS Guides and Tools*, U.S. Dept. of Housing and Urban Development  
<https://www.hudexchange.info/resource/4055/hmis-project-descriptor-data-elements-manual/>