

Monday, November 13, 2023, 1:00 p.m. – 3:00 p.m. All Member Meeting

Butte County Employment & Social Services

Zoom Link: https://us02web.zoom.us/j/81177357401?pwd=OVNNa0h1SGNYVHdqUnNWQ2x6aWFiZz09

Join by Phone: +1 669 900 9128

Zoom Meeting ID: 811 7735 7401 **Passcode:** 204254

COC COUNCIL MEMBERS:

Amber Abney-Bass Ed Mayer Jennifer Macarthy Sarah Frohock Anastacia Snyder **Emily Pereira** Marie Demers Steve Culleton Ann Winters Ian Clement Marin Hambley Tami Ritter Brad Brunner Josh Jamison Meagan Meloy Tracy Johnstone

Briana Harvey-Butterfield Keesha Hills

10) Committee Reports – *INFORMATION*

CoC Coordinator: Erin Murray Lisa Angle **Recording:**

<u>AGENDA</u>

Convene Meeting and Establish Quorum A. Snyder 1) A) Virtual Meeting Format. Recording Meeting. Approval of Minutes - ACTION A. Snyder 2) A) CoC Council Meeting, September 18, 2023 Community Partner Spotlight - INFORMATION A. Abney-Bass 3) Jesus Center - Renewal Center Presenting: Amber Abney-Bass

Genesis Shelter Update - INFORMATION A. Abney-Bass 4)

Council Member Nominations and Elections - ACTION: All Voting Members E. Murray 5)

Governance Update - ACTION: All Voting Members E. Murray 6) Policy and Procedure: Rapid Rehousing

HMIS/CES Update - ACTION: All Voting Members E. Rawlinson 7) Policy and Procedure: HMIS

2024 CoC Meeting Calendar - *INFORMATION* E. Murray 8)

Lead Agency, Collaborative Applicant, Administrative Entity Updates – *INFORMATION* B.H. Butterfield 9)

All

| 11) | Coalition and Jurisdiction Reports/Updates – <i>INFORMATION</i> | All |
|-----|---|-----|
| 12) | Announcements | All |
| | N N 1 . D 1 . 10 . 2022 G | |

13) Next Meeting – Monday, December 18, 2023: Council Member Meeting Butte County Department of Employment & Social Services to host Virtual Meeting

14) ADJOURN



Continuum of Care All Member Meeting Virtual Meeting November 13, 2023 1:00 p.m. – 3:00 p.m.

CoC Agenda Item #2:

Approval of Minutes:

A) September 18, 2023 CoC Council Meeting

Butte Countywide Homeless Continuum of Care Council Meeting Minutes

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Butte Countywide Homeless Continuum of Care

Butte County Continuum of Care Councilmember Minutes Monday - September 18, 2023 1:00 PM to 3:00 PM

Zoom Meeting Hosted by: Butte County Employment & Social Services

COUNCIL MEMBERS PRESENT:

Amber Abney-Bass, Jesus Center

Anastacia Snyder, Catalyst

Ed Mayer, HACB

Briana Harvey-Butterfield, DESS H&H

Sarah Frohock, BCDBH

Tami Ritter, BC Board of Supervisors Emily Pereira, Youth for Change Ian Clement, Hope Cooperative Jennifer Macarthy, City of Chico Marie Demers, City of Chico Tracy Johnstone, City of Oroville

Ann Winters, Catalyst Brad Brunner, Caminar

COUNCIL MEMBERS ABSENT:

Josh Jamison, Oroville Hope Center

Marin Hambley, Stonewall Keesha Hills, OSCIA

Steve Culleton, Town of Paradise

Meagan Meloy, BCOE

OTHER ATTENDEES:

Teri DuBose, Congressman LaMalfa Amy Bergstrom, City of Oroville

Angie Little, HACB

Anita Michniuk, Home & Health Care

Jaymee McLaughlin, CUSD Tracey Gillihan, Butte-Glenn 211

Wendy Lo, DESS H&H

Eduardo Abarca, Ampla Health MMU North

Shelly Storkan, DBH

Monica Soderstrom, Public Health

OTHER ATTENDEES CONT:

Brianna Scott, Aegis Treatment Centers Melissa Jamison, United Way of Nor Cal

Brian Boyer, Esplanade House Matt McCoy, DESS VSO Caitlin Davis-Rivers, CHAT

Debbie Villasenor, Housing Consultant Isabel Alaniz-Alvarado, DESS H&H Connor Wenzel, Stonewall Alliance

Rayna Bryson, DESS

Kenneth Huenink, DESS H&H Mary Jo Alonzo, City of Chico

Lorena Reed, BCDBH Hilary Crosby, Safe Space

Pamela Beeman, Chico Area Interfaith Council

Elisa Rawlinson, DESS H&H

Annie Terry, ORM Ann Winters, Catalyst Shelby Boston, DESS

Nancy Jorth, Youth for Change Maisue Thao, Butte College

Mary Kay Benson, Butte County Shelter

Tiffany Danger, BCOE Dee Price, DESS H&H Susan Roll, CSUC Jesica Giannola, CHAT

Jolene Hausman, Butte County CAPC

Troy McClanahan, DESS H&H Erin Spasbo, DESS H&H Nichole Drummond, CHAT Nick Fashing, DESS ASD Peter Straus, True North

Shelly Miller, First 5

Butte Countywide Homeless Continuum of Care Council Meeting Minutes

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Stefan Spirk, CAA Yesenia Gallegos, CHAT Sherry Morgado, Housing Tools

CoC Coordinator: Erin Murray, DESS H&H **Recording:** Lisa Angle, DESS H&H

ORDER OF BUSINESS

1. CONVENE MEETING AND ESTABLISH QUORUM

The meeting was called to order by Anastacia Snyder, Chairperson at 1:02pm. Roll call of the Council Members conducted by Anastacia Snyder, Chairperson and a quorum was established. This meeting is being facilitated by Anastacia Snyder, Chairperson and the meeting is being recorded.

2. APPROVAL OF MINUTES – ACTION

A motion was made to approve the following minutes as presented.

a. August 21, 2023 - CoC Council Meeting Minutes

Motion: Ed Mayer

Second: Jennifer Macarthy

Opposed: None Abstain: None

b. September 5, 2023 - CoC Special Meeting

Motion: Marie Demers Second: Ed Mayer Opposed: None

Abstain: Anastacia Snyder, Emily Pereira and Jennifer Macarthy

3. FY 2023 CoC PROGRAM CONSOLIDATED APPLICATION AND PLANNING GRANT REVIEW AND APPROVAL - ACTION

Sherry Morgado, Housing Tools, reviewed and explained the FY 2023 CoC Program Consolidated Application included in the agenda packet. Within the ConApp, questions specific to the Domestic Violence Bonus are not included due to time constraints. The questions specifically outline how Catalyst, as the only DV Bonus applicant, would provide services.

Sherry Morgado, Housing Tools reviewed and explained the Planning Grant which is included in the agenda packet.

 A motion was made to approve and accept the FY 2023 CoC Program Consolidated Application and the Planning Grant.

Motion: Tami Ritter Second: Marie Demers Butte Countywide Homeless Continuum of Care Council Meeting Minutes

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Opposed: None Abstain: None

4. 2023 EMERGENCY SOLUTIONS GRANT PROGRAM BALANCE OF STATE (ESG BoS) - ACTION

Wendy Lo, DESS H&H, stated the review and rank committee for the 2023 ESG BoS grant applications met and ranked received applications. There were a higher number of applications received this year compared to the previous year. The rank and review committee recommends 2 applicants for the Regional Competition and 2 applicants for the Non-Competitive Rapid Re-Housing as follows:

Regional Competition: Catalyst and Chico Housing Action Team Non-Competitive Rapid Re-Housing: Chico Housing Action Team and Oroville Rescue Mission

• A motion was made to approve and accept the recommendations from the rank and review committee for the 2023 ESG BoS application.

Motion: Ed Mayer

Second: Amber Abney-Bass

Opposed: None

Abstain: Anastacia Snyder and Ann Winters

5. HOMELESS HOUSING, ASSISTANCE AND PREVENTION ROUND 5 - ACTION

Briana Harvey-Butterfield, DESS Housing Administrator announced the ability to apply for the next round of HHAP funding, round 5. HHAP funding is allocated from the State of California, Business Consumers Services and Housing Agency. This is one time funding and is expected to be released at the end of September. In alignment with HHAP rounds 1 through 4, the County is requesting the CoC to reallocate Round 5 funds in order to complete a joint application for the entire region. The memo included in the agenda packet outlines the details to HHAP 5.

A motion was made to approve the reallocation of HHAP 5 funds to the CoC Administrative Entity.

Motion: Marie Demers Second: Ed Mayer Opposed: None

Abstain: Briana Harvey-Butterfield

6. ELECTIONS POLICY AND PROCEDURE - ACTION

Briana Harvey-Butterfield, DESS H&H, stated the CoC Elections is approaching in November 2023. The Elections Policy and Procedure is included in the agenda packet for review. It is the same Elections process as in the past, however, due to the HHAP 5 collaborative meeting to be held on October 18, 2023 there will not be a CoC Meeting in October and the announcement for the elections is being made in this meeting. The email for the

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request for nominations of CoC Council members, the approved election process, and timeline will be sent out in October.

• A motion was made to approve the CoC Elections Process.

Motion: Ann Winters Second: Ian Clement Opposed: None Abstain: None

7. COMMITTEE CHAIR AND VICE CHAIR UPDATES - ACTION

- a) Households with Children Committee
- b) Chronic Homelessness Committee
- c) Equity Committee

Briana Harvey-Butterfield, DESS H&H, stated the Household with Children Committee, Chronic Homelessness Committee, and the Equity Committee have new Chairpersons and Vice Chairpersons. Seeking CoC Council approval of the newly identified Chairperson's and Vice Chairperson's for those committees.

Household with Children Committee: Chairperson: Bryan Boyer

Vice Chairperson: Jaymee McLaughlin

Chronic Homelessness Committee: Chairperson: Shelly Storkan

Vice Chairperson: Lorena Reed

Equity Committee: Chairperson: Jesica Giannola

Vice Chairperson: Jolene Hausman

• A motion was made to approve the new Chairpersons and Vice Chairpersons for the Household with Children Committee, Chronic Homelessness Committee and the Equity Committee.

Motion: Tracy Johnstone Second: Ian Clement Opposed: None Abstain: None

8. HOUSING AND DISABILITY ADVOCACY PROGRAM RFP - INFORMATION

Briana Harvey-Butterfield, DESS H&H, provided notification that DESS will be releasing a Request for Proposals (RFP) for the Housing and Disability Advocacy Program (HDAP) on October 16, 2023. The proposals requested are for case management and permanent housing.

9. LEAD AGENCY, COLLABORATIVE APPLICANT, ADMINISTRATIVE ENTITY UPDATES - INFORMATION

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Briana Harvey-Butterfield, DESS HH&H, announced the Longitudinal Study has been finalized. An email with the Longitudinal Study will be sent out and be uploaded onto the CoC website. The 2023 PIT jurisdictional breakouts will also be emailed and uploaded on the CoC website.

10. COMMITTEE REPORTS - INFORMATION

Governance - Briana Harvey-Butterfield stated the Governance committee is working on a Revised Rapid Re-Housing Policy to bring to the all member CoC meeting in November.

HMIS/CES - Elisa Rawlinson announced the HMIS/CES Committee is working on the updating HMIS/CES Policies and Procedures to bring to the all member CoC meeting in November. A HMIS how to manual has been released to all HMIS users. The committee is also working on quarterly self-reviews for data quality and compliance with for all the HMIS procedures. Also, the HMIS lead agency is conducting in person annual reviews for of the HMIS participating agencies.

Households with Children - Brian Boyer announced that due to a change in committee chair/vice chair there was no meeting in August. A meeting will be scheduled soon.

Veterans - Matt McCoy stated that there has not been a meeting since the last CoC meeting in August. Briana Harvey-Butterfield reminded CoC members of the 2023 Butte County Veterans Stand Down Sept 21, 22, 23 at Chico Elks Club.

Chronic Homelessness - Shelly Storkan stated that there has been no meeting since the last CoC meeting in August. The next meeting is October 18, 2023 at 1:30pm via zoom.

Youth Homelessness - Emily Pereira stated the last meeting discussed the Youth Advisory Group and hopes of expanding the group to include youth from 6th Street. November is Youth Homelessness Awareness Month and several activities are scheduled for the month such as Round Up at the Barn the entire month, social media commitment cards, candle sales, t-shirt sales, coffee sleaves along with some single day events. If interested in participating in these events contact Josh Indar.

Equity Committee - Briana Harvey-Butterfield announced training last week in the continued efforts on the Diversity, Equity and Inclusion training and the next training is 9/28/23.

11. COALITION AND JURISDICTION REPORTS/UPDATES - INFORMATION

Greater Chico Homeless Taskforce - Ann Winters stated they have not met and hope to meet soon.

Oroville Coalition - Josh Jamison stated there is continued collaboration between the Hope Center, Haven of Hope and Oroville Rescue Mission among others. The Hope Center has partnered with the City of Oroville with City Works Program which will be expanding over the next few years. The name will be Clean Streets which is funded by a modest amount of funding from a grant the City of Oroville applied for and it will expand opportunities for individuals to be employed and there will be opportunities for other agencies to participate in offering employment.

Oroville City Council - Councilmember Tracy Johnstone stated there is no report at this time.

BC Board of Supervisors - Supervisor Ritter stated there is no report at this time.

12. ANNOUNCEMENTS

Anastacia Snyder stated it is Emily Pereira's last meeting with the CoC. Several CoC members shared their appreciation for Emily's work and dedication to the CoC, PIT, and youth in the community.

Elisa Rawlinson, DESS H&H, announced two new HMIS agencies: Butte College and Chico Unified School District.

13. NEXT MEETING -

Save the Date: October 18, 2023 Regional Homeless Planning Symposium 8:30am - 12:30pm October Meeting Cancelled Monday November 13, 2023 All Member Meeting

Butte County Department of Employment & Social Services to host Virtual Meeting

14. ADJOURN:

Anastacia Snyder, Chairperson adjourned the meeting at 1:48pm



Continuum of Care All Member Meeting Virtual Meeting November 13, 2023 1:00 p.m. – 3:00 p.m.

CoC Agenda Item #5:

Council Member Nominations and Elections



DATE: November 13, 2023

MEMORANDUM FOR: CoC Council and Voting Members

FROM: Erin Murray

Program Manager, Housing and Homeless

Butte County Department of Employment and Social Services

Butte Homeless CoC Lead Agency

SUBJECT: 2023 CoC Council Nominations and Elections

1.) Nominations for the CoC Council were solicited via email on October 17, 2023. Reminder emails followed on October 24, 2023 and October 31, 2023. A total of six service area representatives have terms that end December 31, 2023. Newly elected Council members will begin their terms at the first CoC Council Meeting in the new calendar year.

The following nominations were received, noted in alphabetical order by last name:

- 1.) Amber Abney-Bass representing Emergency Shelter
- 2.) Brad Brunner representing Affordable Housing Developer
- 3.) Sarah Frohock representing Mental Health Service Organization
- 4.) Briana Harvey-Butterfield representing Employment and Social Services Organizations
- 5.) Angie Little representing Public Housing Authorities
- 6.) Matthew McCoy representing Veterans Services

Original nomination forms have been attached to this memo.

2.) Nominations were also solicited for the appointment of a recently vacated Council Member position. The Youth Homeless Organizations and Youth Advocates seat was vacated as of September 30, 2023. Nominations for the position were solicited on October 17, 2023 with a due date of November 3, 2023.

The following nomination was received:

1.) Josh Indar representing Youth Homeless Organizations and Youth Advocates

As this seat became vacant prior to the end of the designated term, CoC Council may appoint a representative to fill the vacancy.



| Name of person being nominated: Amber Abney Bass | | |
|--|--|--|
| Phone: 530-345-2640 | Email: amber@jesuscenter.org | |
| Title and Agency (if applicable): Exe | ecutive Director, Jesus Center | |
| | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires that: 1) CoC boards must include at least one homeless or formerly homeless individual. | | |
| ☐ Homeless or Formerly Homeless Indi | vidual | |
| with substance use disorders; persons v | t organizations and projects serving homeless subpopulations (such as persons with HIV/AIDS; veterans; the chronically homeless; families with children; entally ill; and victims of domestic violence, dating violence, sexual assault, whice area. | |
| ☐ Affordable Housing Developer | | |
| □ CDBG/HOME/ESG Entitled Jurisdie | tion /Local Government Staff | |
| ☐ Disability Service Organizations and I | Disability Advocate | |
| ☐ Domestic Violence Service Provider | | |
| ■ Emergency Shelter | | |
| ☐ Employment and Social Services Orga | anizations | |
| ☐ Faith-Based Organization | · · | |
| ☐ Higher Educational Institution | | |
| ☐ Hospital and/or Crisis Response Tean | 18 | |
| ☐ Law Enforcement and Jails | | |
| ☐ Lesbian Gay Bisexual Transgender Q | ueer and Others (LGBTQ+) Service Organizations /Advocates | |
| ☐ Mental Health Service Organization | | |
| ☐ Public Housing Authorities | | |
| School Administrator and Homeless I | iaisons (Preschool-12th Grade) | |
| ☐ Street Outreach Teams | | |
| ☐ Substance Abuse Service Organizatio | n | |
| ☐ Veteran Services | | |
| ☐ Youth Homeless Organizations and Y | outh Advocates | |
| ☐ Other Homeless Subpopulation Advo | cates: | |
| ☐ Other Homeless Subpopulation Advo | | |

What expertise would this individual bring to the council? Amber brings a wealth of experience to the council. As the executive director of the Jesus Center, she oversees a variety of different housing programs and support programs to address the complex and diverse needs of people experiencing homelessness. She understands the value of partnerships as evidences in the collaborations brought to the Renewal Center program (among others).

Name of person making nomination (if different from nominee): Anastacia Snyder

Phone: 530-343-7711

Email: als@catalystdvservices.org



| Name of person being nominated: Amber Abney-Bass | | |
|--|---|--|
| Phone: 530-680-0760 | Email: Amber@jesuscenter.org | |
| Title and Agency (if applicable): | | |
| Service Area: Please select up to two ca | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires tha 1) CoC boards must include at least one h | | |
| ☐ Homeless or Formerly Homeless Indiv | vidual | |
| 2) CoC boards must represent the relevant organizations and projects serving homeless subpopulations (such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; families with children; unaccompanied youth; the seriously mentally ill; and victims of domestic violence, dating violence, sexual assault, and stalking) within the CoC's geographic area. | | |
| ☐ Affordable Housing Developer | | |
| □ CDBG/HOME/ESG Entitled Jurisdic | tion /Local Government Staff | |
| ☐ Disability Service Organizations and Disability Advocate | | |
| □ Domestic Violence Service Provider | | |
| ■ Emergency Shelter | | |
| ☐ Employment and Social Services Organizations | | |
| ☐ Faith-Based Organization | | |
| ☐ Higher Educational Institution | | |
| ☐ Hospital and/or Crisis Response Teams | | |
| ☐ Law Enforcement and Jails | | |
| | ueer and Others (LGBTQ+) Service Organizations /Advocates | |
| ☐ Mental Health Service Organization | | |
| □ Public Housing Authorities | | |
| ☐ School Administrator and Homeless Liaisons (Preschool-12th Grade) | | |
| ☐ Street Outreach Teams | | |
| ☐ Substance Abuse Service Organization | | |
| □ Veteran Services | | |
| ☐ Youth Homeless Organizations and Youth Advocates | | |
| ☐ Other Homeless Subpopulation Advocates: | | |
| ☐ Other Homeless Subpopulation Advo | cates: | |

What expertise would this individual bring to the council? Amber brings with her tremendous experience and expertise as a leader in emergency sheltering serving the County. She is a valued voice and leader in the unhoused sphere.

Name of person making nomination (if different from nominee): Shelby Boston

Phone: 5305526050

Email: sboston@buttecounty.net



| Name of person being nominated: Brad Brunner | | |
|---|--|--|
| Phone: 1(530) 343-4472 Email: BBrunner@Caminar.org | | |
| Title and Agency (if applicable): Ex | ecutive Director, Butte County Caminar | |
| Service Area: Please select up to two ca | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires tha 1) CoC boards must include at least one h | | |
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| with substance use disorders; persons v | t organizations and projects serving homeless subpopulations (such as persons with HIV/AIDS; veterans; the chronically homeless; families with children; entally ill; and victims of domestic violence, dating violence, sexual assault, whice area. | |
| ■ Affordable Housing Developer | | |
| ☐ CDBG/HOME/ESG Entitled Jurisdic | tion /Local Government Staff | |
| ☐ Disability Service Organizations and I | Disability Advocate | |
| ☐ Domestic Violence Service Provider | | |
| ☐ Emergency Shelter | | |
| ☐ Employment and Social Services Orga | anizations | |
| ☐ Faith-Based Organization | | |
| ☐ Higher Educational Institution | | |
| ☐ Hospital and/or Crisis Response Team | 18 | |
| ☐ Law Enforcement and Jails | | |
| ☐ Lesbian Gay Bisexual Transgender Q | ueer and Others (LGBTQ+) Service Organizations /Advocates | |
| ☐ Mental Health Service Organization | | |
| ☐ Public Housing Authorities | | |
| ☐ School Administrator and Homeless I | laisons (Preschool-12th Grade) | |
| ☐ Street Outreach Teams | | |
| ☐ Substance Abuse Service Organization | n | |
| ☐ Veteran Services | | |
| ☐ Youth Homeless Organizations and Y | outh Advocates | |
| ☐ Other Homeless Subpopulation Advoc | | |
| ☐ Other Homeless Subpopulation Advoc | cates: | |

What expertise would this individual bring to the council? Brad is an existing CoC Council member and serves on the CES subcommittee. He contributes to the collaborative effort by CoC members to provide affordable housing and key support services to unsheltered community members throughout Butte County. He oversees the management of Caminar's two permanent supportive housing complexes (located in Chico and Oroville).

Name of person making nomination (if different from nominee): Debbie Villasenor

Phone: 1 (530) 521-6401

Email: dvilla64@sbcglobal.net



| Name of person being nominated: Sarah Frohock | | |
|---|---|-----------|
| Phone: 1(530) 552-5013 | Email: sfrohock@buttecounty.net | |
| Title and Agency (if applicable): Progr | ram Manager, Specialty Mental Health Programs, Butte County Department of Behavior | al Health |
| Service Area: Please select up to two can | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires that 1) CoC boards must include at least one h | | |
| ☐ Homeless or Formerly Homeless Indiv | vidual | |
| with substance use disorders; persons v | t organizations and projects serving homeless subpopulations (such as with HIV/AIDS; veterans; the chronically homeless; families with chile entally ill; and victims of domestic violence, dating violence, sexual as whic area. | dren; |
| ☐ Affordable Housing Developer | | |
| □ CDBG/HOME/ESG Entitled Jurisdict | tion /Local Government Staff | |
| ☐ Disability Service Organizations and I | Disability Advocate | |
| ☐ Domestic Violence Service Provider | | |
| ☐ Emergency Shelter | | |
| ☐ Employment and Social Services Orga | anizations | |
| ☐ Faith-Based Organization | | |
| ☐ Higher Educational Institution | | |
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| ■ Mental Health Service Organization | | |
| ☐ Public Housing Authorities | | |
| ☐ School Administrator and Homeless L | iaisons (Preschool-12th Grade) | |
| ☐ Street Outreach Teams | | |
| ☐ Substance Abuse Service Organization | n | |
| ☐ Veteran Services | | |
| ☐ Youth Homeless Organizations and Y | outh Advocates | |
| ☐ Other Homeless Subpopulation Advoc | | |
| ☐ Other Homeless Subpopulation Advoc | | |

What expertise would this individual bring to the council? Sarah currently serves on the CoC Council and is the Co-Chair of the CES Subcommittee. She is skilled at problem-solving and collaborates well with her colleagues. She has years of experience helping unsheltered individuals with serious mental illness secure housing and engage in services that increases their self-sufficiency.

Name of person making nomination (if different from nominee): Debbie Villasenor

Phone: 1 (530) 521-6401

Email: dvilla64@sbcglobal.net



| Name of person being nominated: Briana Harvey Butterfield | | |
|---|--|--|
| Phone: 5305526202 | Email: bhbutterfield@buttecounty.net | |
| Title and Agency (if applicable): | | |
| Service Area: Please select up to two ca | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires tha 1) CoC boards must include at least one h | | |
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| ☐ CDBC/HOME/ESG Entitled Jurisdic | tion /Local Government Staff | |
| ☐ Disability Service Organizations and I | Disability Advocate | |
| □ Domestic Violence Service Provider | | |
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| ☐ Higher Educational Institution | | |
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| ☐ Youth Homeless Organizations and Y | outh Advocates | |
| ☐ Other Homeless Subpopulation Advo | cates: | |
| ☐ Other Homeless Subpopulation Advo | cates: | |

What expertise would this individual bring to the council? Briana is the Housing Administrator for the County. She plays a piviotal role in overseeing the COC as well as a multitude of funding streams serving the CBOs and community members here in Butte County.

Name of person making nomination (if different from nominee): Shelby Boston

Phone: 5305526050

Email: sboston@buttecounty.net



| Name of person being nominated: Angie Little | | |
|--|---|--|
| Phone: (530) 895-4474 x 231 Email: angiel@butte-housing.com | | |
| Title and Agency (if applicable): Sect | ion 8 Housing Manager, Housing Authority of the County of Butte | |
| Service Area: Please select up to two can | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires that: 1) CoC boards must include at least one homeless or formerly homeless individual. | | |
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| ☐ Veteran Services | | |
| ☐ Youth Homeless Organizations and Y | outh Advocates | |
| ☐ Other Homeless Subpopulation Advoc | | |
| ☐ Other Homeless Suppopulation Advoc | | |

| What expertise would this individual bring to the council | ² Angie Little is responsible for Houisng Authority administration of the HUD Section 8 Housing Choice Voucher, Section 8 HUD-VASH, Section 8 Emergency Housing Voucher, Section 8 Project Based Voucher and HUD FUP and FYI programs. She has extensive experience coordinating with CoC Service providers, and has administered HUD CoC Homeless programs. |
|---|---|
| Name of person making nomination (if different from no | minee): Ed Mayer |
| Phone: (530) 774-1848 cell | Email: edm@butte-housing.com |



| Name of person being nominated: Matthew McCoy | | |
|--|---|--|
| Phone: 530.552.6580 | Email: mmccoy@buttecounty.net | |
| Title and Agency (if applicable): Vet | erans Service Officer, Butte County DESS | |
| Service Area: Please select up to two ca | tegories in which the person might serve as a council representative. | |
| The CoC Program interim rule requires that: 1) CoC boards must include at least one homeless or formerly homeless individual. | | |
| ☐ Homeless or Formerly Homeless Indi | vidual | |
| 2) CoC boards must represent the relevant organizations and projects serving homeless subpopulations (such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; families with children; unaccompanied youth; the seriously mentally ill; and victims of domestic violence, dating violence, sexual assault, and stalking) within the CoC's geographic area. | | |
| ☐ Affordable Housing Developer | | |
| ☐ CDBG/HOME/ESG Entitled Jurisdie | | |
| ☐ Disability Service Organizations and Disability Advocate | | |
| □ Domestic Violence Service Provider | | |
| ☐ Emergency Shelter | | |
| ☐ Employment and Social Services Org | anizations | |
| ☐ Faith-Based Organization | | |
| ☐ Higher Educational Institution | | |
| ☐ Hospital and/or Crisis Response Team | ns | |
| ☐ Law Enforcement and Jails | 1 Out (I CDTO)) Service Opposite tions /A dyonetes | |
| | ueer and Others (LGBTQ+) Service Organizations /Advocates | |
| ☐ Mental Health Service Organization | | |
| ☐ Public Housing Authorities | and All States and the second decades assessment | |
| School Administrator and Homeless I | Liaisons (Preschool-12 th Grade) | |
| ☐ Street Outreach Teams | | |
| ☐ Substance Abuse Service Organizatio | n | |
| ■ Veteran Services | | |
| ☐ Youth Homeless Organizations and Youth Advocates | | |
| ☐ Other Homeless Subpopulation Advo | cates: | |
| ☐ Other Homeless Subpopulation Advo | cates: | |

What expertise would this individual bring to the council? Matt has been representing veterans for years through the Veterans Service Office. In his role as Veterans Service Officer he has expanded access to services for many local veterans that are experiencing homelessness or are unstably housed.

Name of person making nomination (if different from nominee): Erin Murray

Phone: 530.552.6208

Email: emurray@buttecounty.net



| Name of person being nominated: Josh Indar | | |
|--|--|--|
| Phone: 530-879-3780 Email: jindar@bcoe.org | | |
| Title and Agency (if applicable): BCOE School Ties, Tutoring Coordinator | | |
| Service Area: Please select up to two categories in which the person might serve as a council representative. | | |
| The CoC Program interim rule requires that: 1) CoC boards must include at least one homeless or formerly homeless individual. | | |
| ☐ Homeless or Formerly Homeless Individual | | |
| 2) CoC boards must represent the relevant organizations and projects serving homeless subpopulations (such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; families with children; unaccompanied youth; the seriously mentally ill; and victims of domestic violence, dating violence, sexual assault, and stalking) within the CoC's geographic area. | | |
| ☐ Affordable Housing Developer | | |
| □ CDBC/HOME/ESG Entitled Jurisdiction /Local Government Staff | | |
| ☐ Disability Service Organizations and Disability Advocate | | |
| □ Domestic Violence Service Provider | | |
| □ Emergency Shelter | | |
| ☐ Employment and Social Services Organizations | | |
| ☐ Faith-Based Organization | | |
| ☐ Higher Educational Institution | | |
| ☐ Hospital and/or Crisis Response Teams | | |
| □ Law Enforcement and Jails | | |
| ☐ Lesbian Gay Bisexual Transgender Queer and Others (LGBTQ+) Service Organizations /Advocates | | |
| ☐ Mental Health Service Organization | | |
| □ Public Housing Authorities | | |
| ☐ School Administrator and Homeless Liaisons (Preschool-12th Grade) | | |
| □ Street Outreach Teams | | |
| ☐ Substance Abuse Service Organization | | |
| □ Veteran Services | | |
| ■ Youth Homeless Organizations and Youth Advocates | | |
| □ Other Homeless Subpopulation Advocates: | | |
| □ Other Homeless Subpopulation Advocates: | | |

What expertise would this individual bring to the council? Years of experience working with BCOE Shool Ties services and at 6th Street Center for Youth. Currently the Chair of the CoC Youth Homelessness Committee

Name of person making nomination (if different from nominee): Nancy Jorth

Phone: 530-321-0475 Email: njorth@youth4change.org



Continuum of Care All Member Meeting Virtual Meeting November 13, 2023 1:00 p.m. – 3:00 p.m.

CoC Agenda Item #6:

Governance Update:

A) Policy and Procedure: Rapid Rehousing

2.5 Written Standards

III Rapid Re-Housing

Rapid re-housing is one of several housing interventions that can be funded through many federal, state, and local funding sources. Rapid re-housing may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and achieve stability in that housing.

I. Coordinated Entry Integration

All referrals to rapid re-housing, including screening for program eligibility and prioritization, shall occur according to the CoC's Coordinated Entry system protocols. Program admission is prioritized for people with the most urgent and severe needs (as defined in California Code of Regulations Title 25, §8409 Core Practices).

Program Participants shall be referred to other forms of homeless assistance in the CoC service area according to the CoC's Coordinated Entry system procedures.

Program Participants are provided access to rapid re-housing assistance without preconditions, according to Housing First, Progressive Engagement and Assistance Practices.

II. Housing First, Progressive Engagement and Assistance Practices

Program Participants and staff understand that the primary goal of rapid re-housing is to end homelessness and move Program Participants into housing as quickly as possible, regardless of other personal issues or concerns.

- A. Program Participant assessment focuses on barriers to obtaining and/or maintaining housing (i.e. past rental history, credit, criminal history, current income, legal issues, knowledge of tenant rights and responsibilities, etc.).
- B. Program Participants are assisted with creating and (for ongoing assistance) updating individualized Housing Plans/Service Plans designed to re-house and stabilize Program Participants as quickly as possible.
- C. Program Participants are provided assistance to locate and obtain permanent housing, financial assistance for move-in and stabilization costs, and housing case management in order to achieve their Housing Plan/Service Plan goals. This includes assistance to

address tenancy problems that may jeopardize housing. Assistance is provided as follows:

- 1. Without additional preconditions, such as employment or sobriety; and
- 2. With understanding that housing may cost greater than thirty percent of Program Participant income and be precarious.
- D. Staff (i.e. case managers, housing navigators, or others within service provider agencies directly assisting Program Participants) helping Participants are aware of and know how to access a wide array of housing options (public/private, subsidized/unsubsidized, local permanent supportive housing, etc.) to help Program Participants achieve their Housing Plan/Service Plan goals.
- E. Staff are aware of and know how to access other community resources (i.e. legal services, subsidized childcare) that can help Program Participants achieve their housing placement and stabilization goals.
- F. Participation in services unrelated to obtaining or maintaining permanent housing is voluntary.

III. Participant Eligibility

A Program Participant shall be screened for and offered rapid re-housing assistance, to the extent they are eligible and assistance is available. Program Participants must meet the criteria in this section to be eligible for assistance under rapid re-housing¹.

- A. Program Participant is an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - 1. Has a primary nighttime residence that is a public or private place not meant for human habitation.
 - 2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by federal, state, and local government programs); or
 - 3. Is exiting an institution where they have resided for ninety days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- B. Program Participant is an individual or family who:
 - 1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, and/or human trafficking; and
 - 2. Has no other residence; and

¹ Non-federal funding may allow for services to be provided to Program Participants that are experiencing homelessness under a broader definition.

- 3. Lacks resources or support networks to obtain other permanent housing; and
- 4. Lacks a fixed, regular, and adequate nighttime residence as described above in section III.A.
- C. Program Participant household income must not exceed thirty percent of Area Median Income (AMI)².
 - 1. An income assessment is not required at initial evaluation.
 - 2. Re-evaluation must occur no less than once annually.

IV. Eligible Activities

A. Financial Assistance

- 1. Rental Application Fees: Program funds may be used to pay rental application fees that are charged by the owner/property management to all applicants.
 - a) No more than five application fees³ per adult Program Participant in a twelve-month period.
 - b) The application fee cannot exceed the cost of obtaining a consumer credit report and value of the time spent by the owner/property management in gathering information concerning the Program Participant. This amount is adjusted annually at the direction of the State of California⁴; as of 2023 an application fee cannot exceed \$54.70.
- 2. Security Deposits: Program funds may be used to pay a security deposit that is equal to no more than two months' rent.
 - a) Deposit cannot be paid if rent exceeds Fair Market Rent (FMR).
 - b) Shall not be paid more than two times in a twelve-month period.
- 3. Last Month's Rent: Program funds may be used to cover last month's rent if required by the owner/property management and as stated in the lease and as funding source allows.
 - a) Cannot exceed Fair Market Rate (FMR).
 - b) Shall not be paid more than twice in a twelve-month period.
- 4. *Utilities*: Program funds may be used to pay for utilities deposits <u>and/or</u> services for gas, electric, water, and sewage only.

² Unless otherwise indicated by funding source.

³ At agency discretion and with justification, additional application fees may be paid.

⁴ Rental application fee set per California Civil Code §1950.6.

- a) <u>Deposits</u> Utility shall be in the name of the Program Participant and shall be the standard utility deposit required by the utility company for all customers.
- b) <u>Services</u> Shall be paid no more than twelve (12) months⁵ in a thirty-six (36) month period, including up to six (6) months of arrears, per service.
 - i. A partial month counts as one month.
 - ii. Any months paid in arrears count toward the allowable twelve months.
- 5. *Moving Costs*: Program funds may be used to pay for moving costs such as truck rental, moving company, or temporary storage. Program Participant must be moving within the CoC jurisdiction⁶ and actively working with a case manager or similar agency staff.
 - a) Truck Rental No more than once in a twelve-month period.
 - b) <u>Moving Company</u> Program Participant must have medical or other need that necessitates moving assistance and there are no other resources available to assist.
 - c) <u>Temporary Storage</u> Shall be paid for no more than three (3) months.
 - Program Participant must be currently unsheltered and requesting storage until they move into permanent housing within the three (3) month period.
 - ii. Fees must be accrued after the date the Program Participant begins working with a case manager or similar agency staff.
 - iii. Storage fees cannot be paid in arrears.
- 6. Emergency Transfer Lease Breaking Fees: Program funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer if the conditions under the Violence Against Women Act (VAWA), listed below, are met. These costs are not subject to the twenty-four month rental assistance limit.
 - a) Program Participant shall be someone experiencing domestic violence, dating violence, sexual assault, stalking, and human trafficking.
 - b) A person experiencing VAWA violence and/or abuse must have an option to stay or request an emergency transfer from current housing due to

⁵ At agency discretion and with justification, ESG allows up to twenty-four months of utility payments, per Program Participant, per service, including up to six months of arrears, in a thirty-six month period.

⁶ At agency discretion and with justification, moving costs may be used for an individual or family moving outside of the CoC jurisdiction.

- safety, and must be allowed to move with no break in their benefits and/or assistance.
- c) Program Participant shall complete the following:
 - i. Emergency Transfer Request Form (HUD-5383)
 - ii. Certification of Domestic Violence, Dating Violence, and Sexual Assault, or Stalking, and Alternate Documentation Form (HUD 5382)
 - iii. A written statement expressing that the Program Participant reasonably believes that there is a threat of imminent harm from further violence if they were to remain in the same dwelling unit or a written statement that the Program Participant was a sexual assault victim and that the sexual assault occurred on the premises during the ninety-calendar-day period preceding their request for an emergency transfer.
- d) All information must be kept strictly confidential.
- e) Program Participant transfer request must be acted upon as quickly as the service provider is able to accommodate the request. If a Program Participant reasonably believes a proposed transfer would not be safe, the Program Participant may request to transfer to a different unit.
- 7. *Rental Assistance*: Program funds may be used to cover short-term rental assistance, medium-term rental assistance, rental arrears, or a combination of all three.
 - a) Rental assistance cannot be provided unless the rent:
 - i. Is equal to or less than current Fair Market Rate (FMR); or
 - ii. Complies with California Department of Housing and Community Development's (HCD) standards of Rent Reasonableness. See <u>CA</u> HCD ESG Fair Market Rent and Rent Reasonable Policy.
 - a. In order to be considered "reasonable" the rent of the Program Participant's unit must be no more than one-hundred dollars more than the average gross rent of three comparable unassisted units.
 - <u>The Rent Reasonableness and Fair Market Rent</u>
 <u>Certification</u> must be used to determine rent reasonableness and be saved within HMIS.
 - c. Rent reasonableness is to be determined by the case manager or other staff as assigned by the service provider.

- d. If a service provider believes a modification or waiver is necessary, requests shall be submitted by email to <u>ESGRegulations@hcd.ca.gov</u>.
- iii. Is certified as within FMR or Rent Reasonableness limits at the following times:
 - a. Before reimbursing any rental assistance cost for a newly leased Program Participant unit;
 - Before reimbursing any rental assistance for an existing Program Participant unit whose lease has been amended in such a way that changes the amount of money being paid for the unit through rapid re-housing, the Program Participant, or both;
 - Before reimbursing any rental assistance cost for an existing Program Participant unit that has been recertified according to rapid re-housing policy or program requirements; and
 - d. When monitoring Program Participant files (i.e. during the annual monitoring process.
- b) Except for rental arrears, rental assistance cannot be provided to a Program Participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources. Only the Program Participant portion of rental arrears may be paid.
- c) Program Participant must have a legally binding, written lease for the rental unit between the owner/property management and the Program Participant. The lease shall include the following provisions:
 - i. Have an initial term of one year with option to renew;
 - ii. Include a lease provision or addendum that includes all requirements that apply to tenants under 24 CFR part 5 subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409 including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005 (b) and (c).
 - iii. Comply with Lead Safe Housing Rules⁷.
- d) Service provider and owner/property management must sign an agreement outlining what payments are to be made.

⁷ The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A,B,H,J,K,M, and R.

- e) <u>Short Term</u> (month one through three) Full rent shall be paid for one (1) to three (3) months.
- f) Medium Term (month four (4) through twelve (12))⁸ Program
 Participant shall be responsible to pay thirty percent of their income
 toward rent, program funds shall be used to pay the remaining amount. If
 the Program Participant does not have income, program funds shall be
 used to pay the rent in full.
 - i. The service provider may institute a tiered approach to mediumterm rental assistance.
- g) <u>Rental Arrears</u> Payment of rental arrears shall consist of a one-time payment for up to six months in arrears, including any late fees on those arrears. Any months paid in arrears count toward the allowable twelve months.

B. Service Costs

- 1. Housing Search and Placement: Program funds may be used to pay the costs of services or activities necessary to assist participants in locating, obtaining, and retaining suitable permanent housing, including the following:
 - a) Assessment of housing barriers, needs, and preferences;
 - b) Development of an action plan for locating housing;
 - c) Housing search;
 - d) Outreach to and negotiation with owners;
 - e) Assistance with submitting rental applications and understanding leases;
 - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness;
 - g) Assistance with obtaining utilities and making moving arrangements; and
 - h) Tenant counseling.
- Housing Stability Case Management: Program funds may be used to pay the cost assessing, arranging, coordinating, and monitoring the delivery of individual services to facilitate housing stability for a Program Participant who resides in permanent housing or to assist participant in overcoming immediate barriers to obtain housing.

⁸ At agency discretion and with justification, ESG allows up to twenty-four months of rental assistance payments, including up to six months of arrears, in a thirty-six month period.

- a) This assistance shall not exceed thirty days⁹ during the period in which the Program Participant is seeking housing and cannot exceed twenty-four months in which the participant is living in permanent housing.
- b) Activities consist of the following:
 - i. Using the local CoC's Coordinated Entry system;
 - ii. Evaluating Program Participant eligibility for rapid re-housing;
 - iii. Counseling;
 - iv. Developing, securing, and coordinating services and obtaining federal, state, and local benefits;
 - v. Monitoring and evaluating Program Participant progress;
 - vi. Providing information and referrals to other service providers;
 - vii. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
 - viii. Conducting Program Participant eligibility re-evaluations no less than every three months.
- 3. *Mediation*¹⁰: Program funds may be used to pay for mediation between the Program Participant and the owner or person(s) with whom the participant is living, provided that mediation is necessary to prevent the Program Participant from losing permanent housing in which they currently reside.
- 4. *Legal Services*: Program funds may pay for legal services¹¹ for landlord/tenant matters that resolve a legal problem that prohibits the Program Participant from obtaining permanent housing or will likely result in the Program Participant losing the permanent housing in which they reside.
- 5. *Credit Repair*: Program funds may be used for credit counseling and other services necessary to assist Program Participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems.
 - a) A maximum of \$1,000 of program funds may be used to support credit counseling services per household, as funding allows.
 - b) Credit Repair does not include repayment or modification of debt with the exception of rent and utility arrears.

⁹ At agency discretion and as funding source allows, thirty day timeframe may be increased.

¹⁰ Not all funding sources allow for mediation and/or legal services.

¹¹ See 24CFR 576.102(a)(1)(vi) for eligible costs.

Staffing Pattern

- A. Staff providing direct services must maintain a caseload sufficient to meet any commitments or projects regarding the number of Program Participants to be served by the project during a given period. It is recommended each case manager assists no more than ten to fifteen Program Participants at any given time.
- B. Stuff must document Program Participant data and services in Homeless Management Information System (HMIS) in an accurate and timely manner following the approved HMIS Policies and Procedures Manual.

V. Termination and Appeals

If a Program Participant violates program requirements, assistance may be terminated in accordance with a formal process established by the service provider that recognizes the rights of the Program Participants affected. The service provider must exercise judgement and examine all extenuating circumstances in determining when violations warrant termination so that a Program Participant's assistance is terminated only in the most severe cases.

Termination does not bar the Program Participant from receiving further assistance at a later date.

- A. Program Participant must receive written notice containing a clear statement of the reasons for termination;
- B. A review for the decision, in which the Program Participant is given the opportunity to present written or oral objections before a person other than the person (or subordinate of that person) who made or approved the termination decision; and
- C. Prompt written notice of the final decision to the Program Participant.

VI. General Operations

Service providers shall ensure that all rapid re-housing services follow this policy with exceptions made only as necessary, as outlined within this policy, and within the confines of the funding source.

This policy shall be reviewed annually and revised as necessary by the CoC.



Continuum of Care All Member Meeting Virtual Meeting November 13, 2023 1:00 p.m. – 3:00 p.m.

CoC Agenda Item #7:

HMIS/CES Update:

A) Policy and Procedure: HMIS

HMIS Policies and Procedures

Butte Countywide Homeless Continuum of Care

For use by the CoC Council, CoC Coordinator, HMIS Committee, HMIS Lead Agency, HMIS Software System Provider, Contributing HMIS Organizations, CHO Agencies, and all End Users Created September 20, 2023
Approved on October 23, 2023

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Background

In accordance with Congressional requirements, the U.S. Department of Housing and Urban Development (HUD) requires the development and maintenance of a local Homeless Management and Information System (HMIS) for all communities receiving Homeless Assistance Grants and organized as a Continuum of Care (CoC).

HMIS is an electronic data collection system designed to store longitudinal consumer-level data about the people accessing homeless services in a CoC. With the ability to integrate and de-duplicate data from all homeless assistance and homelessness prevention programs in a community, it can provide the means to understand the size, characteristics, and needs of a community's homeless population who are engaged in services.

HMIS data is used by HUD 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 the CoC Program and Emergency Solutions Grant ("ESG") funds participate in their CoC's HMIS. The State of California Assembly Bill (AB) 977, additionally states all state funded homeless service grants must participate in 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 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, 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 CoC must participate in 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 HMIS, electronically transferring data to the HMIS Lead Agency, or through other means determined by the HMIS Lead Agency. Such an HMIS participant is called a "Contributory HMIS Organization (CHO)" in these HMIS Policies and Procedures.

A Continuum of Care is a group composed of representatives of organizations, including nonprofit providers of homeless services, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, veterans service providers, mental health agencies, hospitals, universities, affordable housing developers and law enforcement, that serve homeless, formerly homeless, and those at-risk of homelessness and that carry out the responsibilities delegated to a Continuum of Care under HUD's regulations for a particular community. A Continuum of Care is ultimately responsible for oversight and guidance of HMIS. A Continuum of Care is also responsible for oversight of the security of the data and any public use of the data.

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 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. In 2020, the Butte CoC, entered into an agreement with the Butte County Department of Employment and Social Services, to serve as the HMIS Lead Agency. More specific HMIS Lead Agency responsibilities are described in the HMIS Lead Agency Memorandum of Understanding (MOU) between the Butte County Department of Employment and Social Services (DESS) and the Butte CoC. In all HMIS governance decisions, the Butte CoC will balance the interests and needs of all HMIS stakeholders, including homeless individuals and households, service providers, and policymakers.

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; Butte CoC Governance Charter; and HMIS Lead Agency MOU.

This document should, at a minimum, reflect the baseline requirements listed in the HMIS Data and Technical Standards Final Notice, published by HUD in July 2004 and revised in March 2010. All HMIS End Users are required to read and comply with the HMIS Data and Technical Standards. Failure to comply with the HUD standards carries the same consequences as failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures and Security Plan are not consistent with the HUD HMIS Standards, the HUD Standards take precedence. Should any inconsistencies be identified, please immediately notify the HMIS Lead Agency.

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these Policies and Procedures. Agencies and programs are responsible for ensuring HIPAA compliance.

HMIS Lead Agency Information

Butte County Department of Employment and Social Services (DESS) 205 Mira Loma Drive, Suite 50 Oroville, CA 95965
HMIShelp@buttecountv.net

| HMIS Contact Information | Contact Reason |
|--|---|
| Elisa Rawlinson Senior Health and Human Services Analyst <u>erawlinson@buttecounty.net</u> (530) 552-6204 | 1. HMIS Lead for the Butte CoC. |
| HMIS Inbox HMIShelp@buttecounty.net | Requests for new agency access, new user access, new programs, deactivation of users, etc. |
| | 2. Requests for support related to data quality and management. |
| | 3. General technical support for HMIS issues related to user access, troubleshooting, information requests, system functionality errors, etc. |
| | 4. Training |
| | 5. Requests for issues related to data quality, management and/or mandated reports, report failure, etc. |

HMIS Terminology and Definition of Terms

Annual Comprehensive Security Audit: An audit conducted by the HMIS Lead agency on an annual basis. The audit will be conducted by the HMIS Lead or other designee, and will review CHO compliance related to agency workstation and devices used for HMIS data collection, agency website. The audit will also review agency level and program level data to ensure compliance with data quality standards laid out by HUD, the local HMIS Policies and Procedures and the Data Quality Plan.

Annual Homeless Assessment Report (AHAR): HUD's annual report to Congress on the nature and extent of homelessness nationwide.

Annual Performance Report (APR): The AHAR is the annual report that HUD submits to the U.S. Congress. The report provides nationwide estimates of homelessness, including information on the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based primarily on HMIS data. (Formerly known as the Annual Progress 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 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 Memorandum of Understanding (MOU): An agreement, Memorandum of Understanding (MOU), 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.

Chronically Homeless (CH): According to HUD definition, a chronically homeless individual is a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, in an emergency shelter, or in an institutional care facility. The individual must have been living in any of the above-described places either continuously for at least 12 months or on at least 4 separate occasions in the last three (3) years. Chronically homeless families are families with adult heads of households who meet the definition of a chronically homeless individual. If there is no adult in the family, the family would still be considered chronically homeless if the minor head of household meets all the criteria of a chronically homeless individual.

Client: A living individual about whom a Butte COC/CHO collects or maintains protected personal information: (1) because the individual is receiving, has received, may receive, or has inquired about services from a Butte COC/CHO: or (2) in order to identify service needs, or to plan or develop appropriate services within the CoC.

Continuum of Care (CoC): The primary decision-making entity defined in the funding applications to HUD as the official body representing a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency.

Contributory HMIS Organization (CHO): 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.

Coordinated Entry System (CES): Coordinated entry is a consistent, community wide intake process that is used to match people experiencing homelessness to existing community resources that are the best fit for their situation. Coordinated assessment (the housing needs assessment approved by the CoC) maximizes the use of available resources and minimizes the time and frustration people spend while trying to find assistance. It also identifies and quantifies housing and service gaps and thereby enables effective and

efficient systems planning.

Disaster Recovery Plan: A plan to allow safe and secure access to data and information necessary to assist an organization (CHO) in executing recovery processes in response to a disaster to protect business and software infrastructure and more generally promote recovery.

Emergency Shelters (ES): An emergency shelter is a place for homeless people to live temporarily. Most emergency shelters provide shelter for a specific time-period e.g. 90 days after which the individual or family is expected to vacate it.

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 HMIS or another administrative database from which data are periodically uploaded to HMIS.

Homeless Data Integration System (HDIS): HDIS compiles and processes data from all 44 California CoCs, regional homelessness services coordination and planning bodies, into a statewide data warehouse. Each CoC collects data about the people it serves through its programs, such as homelessness prevention services, street outreach services, permanent housing interventions and a range of other strategies aligned with California's Housing First objectives.

Homeless Management Information System (HMIS): The information system designated by a CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

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

HMIS Software System: A HMIS data management software program developed and serviced by a 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.

Homeless Assistance Program: A program whose primary purpose is to meet the specific needs of people who are literally homeless. Homeless assistance program include outreach, emergency shelter grant, transitional housing, rapid re-housing, permanent housing and permanent supportive housing.

Homeless Prevention Program: A program whose primary purpose is to meet specific needs of people who are at risk of homeless. Homelessness preventions programs include those funded by HPRP and other homelessness prevention programs identified by the CoC as part of its service system.

Housing First: Housing First is an approach to address homelessness. In the last few years, Housing First has become one of the most popular models for serving chronically homeless people. This approach is based on the understanding that homelessness is primarily a lack of housing and the fastest way to help a person out of homelessness is to provide that person with housing. The housing first approach focuses on providing housing as quickly as possible and subsequently providing services as needed and desired by the program participants. Permanent Supportive Housing and Rapid Rehousing programs are based on the Housing First Model.

Housing Inventory Count (HIC): The HIC provides information about all of the beds and units in a Continuum of Care homeless system.

HUD Veterans Affairs Supportive Housing Program (HUD-VASH): The HUD-VASH program combines HUD's Housing Choice voucher (HCV) – rental assistance for homeless veterans and their families with case management and clinical services provided by the Department of Veterans Affairs (VA) at its medical centers and in the community.

Literally Homeless: As per HUD definition, a literally homeless individual or family is an individual or family who lacks a fixed, regular and adequate nighttime residence. The individual's or family's primary nighttime residence is a public or private place not meant for human habitation. Or the individual or family is living in a publicly or privately operated shelter or is exiting an institution where (s) he has lived for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution.

Longitudinal System Analysis (LSA): The LSA report, produced from a CoC's HMIS and submitted annually to HUD, and provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use the system of care.

Notice of Funding Opportunity (NOFO): Each year the U.S. Department of Housing and Urban Development (HUD) releases a NOFO signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoCs). HUD also releases a NOFO for the CDBG and HOME programs.

Permanent Supportive Housing (PSH): Permanent Supportive Housing program provides permanent housing and supportive services to chronically homeless individuals and families. The target population for permanent supportive housing program are chronically homeless individuals with a disability. The program focuses on the population that has high acuity and high costs. The program provides rental subsidy, intensive case management and health care (including behavioral health) to the program participants. There is usually no time limit for the program. PSH has been seen to have a high impact on housing stability.

Personal Identifying Information (PII): Protected Identifying Information.

PIT: Point-in-Time Count refers to the Homeless Census and Survey that is undertaken every two (2) years in the last ten (10) days of January. It is mandatory for all jurisdictions receiving funding from HUD to undertake the Point-in-Time Count. The data gathered from the count helps the County and local homeless service providers to better understand the needs of the community, evaluate the current system of services, and apply for federal and local funding.

Protected Personal Information (PPI): Information about a consumer: (1) whose identity is apparent from the information or can reasonably be ascertained from the information; or (2) whose identity can, taking into account any methods reasonable likely to be used, be learned by linking the information with other available information or by otherwise manipulating the information.

Program: A program (or *Project* in the HMIS Data Standards) provide the framework for HMIS data collection and reporting. The programs available to a user will depend on agency and staff member settings.

Program Specific Data Elements (PDE): To meet the statutory and regulatory requirements of federally funded programs using HMIS, additional elements are required for different funding sources. The Program Specific Data Elements are elements that are required by at least one of the HMIS Federal Partner programs. Some of the program specific data elements are collected across most Federal Partner programs. These are called "Common" Program Specific Data Elements. Local CoCs may elect to require *all* continuum projects participating in HMIS to collect a subset of the data elements contained in this section to obtain consistent information across a range of projects that can be used to plan service delivery, monitor the provision of services, and identify client outcomes.

Quarterly Compliance Checklist: The Quarterly Compliance Checklist (Appendix G) is intended to assist CHO Administrators in determining if agency workstations and devices used for HMIS data collection, data entry, or Page | 8 of 28

reporting maintain compliance with HMIS Policies and Procedures. Any identified compliance issues must be resolved within thirty (30) calendar days.

Quarterly Data Quality Checklist: The Quarterly Data Quality Checklist (Appendix H) is to be completed for each program and certified by the CHO Administrator. Each HMIS End User and program must be certified compliant with all data quality standards laid out by HUD, by the local HMIS Policies and Procedures and the Data Quality Plan. Any identified compliance issues must be resolved within thirty (30) calendar days.

Rapid Re-Housing (RRH): Rapid rehousing is an intervention that has been seen to be a successful model in addressing the issue of homelessness in different parts of the country. There are three (3) core-components of rapid rehousing– 1. Housing identification, 2. Move-in and rent assistance and 3. Rapid rehousing case management and services. The clients are provided shallow or declining rent subsidy, other temporary financial assistance and time-limited case management. It has been observed that rapid rehousing helps individuals and families to quickly exit homelessness, return to housing in the community and not become homeless again in the near future.

Service: Services provide a way to record the assistance provided to clients, from one-time events like utility assistance to daily services like meals and shelter. Services can be provided at the client and household level or to groups of clients.

Transition Age Youth (TAY): Transition Age youth are young people between the age of 16(or 18) and 24 who are in transition from state custody or foster care and are at-risk. When they turn 25, they can no longer receive the services.

Transitional Housing (TH): Transitional housing is temporary, supportive housing for people. Transitional housing is generally provided for a limited time period –from 2 weeks to 24 months.

Universal Data Elements (UDE): HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source. Projects funded by any one or more of the federal partners must collect the Universal Data Elements, as do projects that are not funded by any federal partner (e.g. missions) but have agreed to enter data as part of the Continuum of Care's HMIS implementation. The Universal Data Elements are the basis for producing unduplicated estimates of the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stays and homelessness over time.

U.S. Department of Housing and Urban Development (HUD): The federal government's Department of Housing and Urban Development. HUD determines rules and regulations related to CoCs and HMIS.

Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT): The VI-SPDAT is a part of the coordinated assessment process. The tool is used at the time of intake. It considers the household's situation and identifies the best type of housing/supportive services intervention to address the household's situation.

HMIS Overview

The long-term vision of HMIS is to enhance CHOs' collaboration, service delivery, and data collection capabilities by sharing information. Accurate information will place the Butte CoC in a better position to request funding from various sources and assist in more strategic future planning. HMIS is designed to be an integrated network of homeless and other service providers that use a central database to collect, track, and report uniform information on client needs, programs, and services. This system not only meets Federal requirements but also enhances service planning, delivery, and outcomes.

A fundamental goal of HMIS is to document the demographics of homelessness in Butte County according to the HUD HMIS directive. It is the goal of the Butte CoC to achieve an accurate count of the number of unhoused community residents, identify patterns in utilization of assistance, document the effectiveness of services, and to ensure equity of assistance for all clients and households served. This will be accomplished through analysis of data that is gathered from individuals and households experiencing homelessness and the service providers who assist them. Data gathered via intake interviews and program participation will be used to complete reports, including but not limited to, HUD Annual Performance Reports, Annual Homeless Assessment Reports, Longitudinal Systems Analysis, and Point-in-Time sheltered counts. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policymakers, service providers, advocates, and consumer representatives.

The local HMIS project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the county. Access to HMIS is limited to agencies who have agreed to uphold these Policies and Procedures by executing a MOU with the HMIS Lead Agency, and then only to authorized staff members who meet the necessary training and security requirements.

Homeless individuals and case managers can benefit from HMIS as a result of improved service coordination. HMIS facilitates information sharing among case management staff within one agency and between agencies (with written client consent) who are serving the same clients.

Agencies serving homeless individuals and program managers can benefit from HMIS by obtaining access to aggregate information that can be used to develop a more complete understanding of clients' needs and outcomes. Such information can then be used to advocate for additional resources, to conduct evaluations of program services, and report to funding agencies such as HUD.

The Butte CoC and policymakers can benefit from HMIS, a county-wide use of a single shared data collection system that provides the capacity to generate reports required by HUD and other funding sources, and allows access to aggregate information that will assist in the identification of gaps in services, as well as informing policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

HMIS Software

The Butte CoC, through the HMIS Lead agency, contracts with Bitfocus, and uses their Clarity Human Services Case Management Software. This software system is compliant with the most recent HUD Data Standards and is capable of generating reports and unduplicated counts of services, which provide a statistical profile of homeless services and consumers. HUD HMIS data standards are updated every 2 (two) years, and Bitfocus, as one of the largest HMIS software systems in the United States, works closely with HUD to ensure compliance. Clarity is a webenabled application residing on a central server to facilitate data collection by homeless service providers in various geographic locations.

Access to the central server is limited to those agencies formally participating in HMIS, including only authorized staff members who have met the necessary training and security requirements. In June 2023, the HMIS/CES Committee agreed to an open HMIS system. Since that time all CHOs, with the exception of those who fall under HIPAA regulations, have been able to view a client's demographic, programmatic, and case management history of

all other agencies that participate in the system. This allows for enhanced coordination of services between HMIS participating agencies and will assist the Butte CoC homeless service system to provide trauma informed care and collaboration in a new way.

HMIS Computer Requirements

CHOs commit to a reasonable program of data and equipment maintenance in order to sustain an efficient level of system operation. CHOs must meet the technical standards for minimum computer equipment configuration:

- Internet connectivity.
- Secure and maintain any computer systems, hardware, software, applications, and data that will be used in the performance of this MOU. This includes ensuring that all security patches, upgrades, and anti-virus updates are applied as appropriate to secure all information assets and data that may be used, transmitted or stored on such systems in the performance of this MOU.
- End Users must have workstation devices password protected screensavers set at no more than 15 minutes.
- Passwords shall not be shared or stored in a readable format on the computer, browser, server, or on paper and must be immediately changed if revealed or compromised.
- Safeguard equipment to ensure non-HMIS users and public cannot access and/or view HMIS information. Safeguarding of equipment includes but is not limited to ensuring video terminals, printers, hard copy printouts or any other forms of HMIS related records are placed so that they may not be viewed by the public or other unauthorized persons.
- End Users must log out of HMIS if they leave their workstation.
- Written information pertaining to user access should not be stored or displayed in any publicly accessible location.
- Data Disposal: The CHO agrees to dispose of documents that contain identifiable consumer level data by shredding paper records, deleting any information from all equipment before disposal, and deleting any copies of consumer level data from the hard drive of any machine before transfer or disposal of property. Clarity takes advantage of the latest in web technologies. For both security and compatibility, it is extremely urgent that an agency's local IT staff ensure all workstations are outfitted with the latest version of the web browser.

Internet Browser Requirements

Clarity Human Services requires an up-to-date web browser to access all of the software's features. To ensure the latest security features are in place, always use the latest version of a supported web browser when accessing Clarity Human Services.

Clarity supports the most recent version of the following web browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Apple Safari

HMIS Guiding Principles

It is the primary governing principle of the Butte County HMIS that the system is intended to serve and protect the community's clients. A safe and secure HMIS system relies on the following guiding principles:

<u>Confidentiality</u> - The rights, privileges, and privacy of clients are crucial to the success of HMIS. Compliance with the Butte CoC *HMIS Policies and Procedures Manual* will help ensure client privacy without impacting delivery of services. Clients will be understood to be the owners of their own data. Each individual will have the right to grant informed consent, limit data sharing, or revoke consent related to his/her PPI at any time.

This must be the primary focus of agency programs participating in HMIS. Collection, access, and disclosure of consumer data through HMIS are only permitted by the procedures set forth in this document, in compliance with the Data Privacy Plan, the client signed Informed Consent (Appendix D) and, if applicable, HIPAA laws.

<u>Data Integrity</u> - Consumer data is the most valuable and sensitive asset of the HMIS. These policies are designed to ensure data integrity and protect information from accidental or intentional unauthorized modification, destruction, or disclosure. All End Users will strive for the highest possible degree of data quality. Data quality is a social justice issue because poor data quality can lead to reductions in funding and services, clients not being referred to the appropriate services to meet their needs, or improper findings of ineligibility.

System Availability - The availability of a centralized data repository is necessary to achieve the optimal type of aggregation of unduplicated homeless statistics across the county. The Butte CoC and the HMIS Lead are responsible for ensuring the broadest deployment and availability of the system for homeless service agencies.

Compliance - Violation of the policies and procedures set forth in this document, in the HMIS Lead Agency MOU, and in the End User Agreement (Appendix C) will be taken very seriously. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity may result in the withdrawal of system access for the offending user and/or entity. The Butte CoC recognizes the need to maintain each consumer's confidentiality and will treat the personal data contained within the HMIS with respect and care. The HMIS Lead agency, HMIS participating agencies, and HMIS End Users have both an ethical and a legal obligation to ensure that data is collected, accessed and used appropriately. Of primary concern to the Butte CoC are issues of security (i.e. encryption of data traveling over the internet, the physical security of the HMIS server), and the policies governing the release of this information to the public, government and funders.

Roles and Responsibilities

Butte CoC Council

The Butte CoC Council is responsible for HMIS project oversight and implementation. This implementation includes but is not limited to; 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.

- 1) Designate a single information system as the official HMIS software for the geographic area.
- 2) Designate an HMIS Lead.
- 3) Approve all HMIS policies, procedures and operational agreements.

- 4) Develop and execute a Governance Charter which includes a requirement that the HMIS Lead enter into written HMIS MOU with each Contributing HMIS Organization (CHO) and such additional requirements as may be issued by notice from time to time.
- 5) Develop and implement a strategic plan for HMIS participation, development and use in data driven decision making.
- 6) Use HMIS data to identify gaps in services to the homeless and promote solutions to local policy makers.
- 7) Educate and raise consciousness of the community about homelessness.

HMIS/CES Committee

The HMIS/CES Committee is designated by the Butte CoC Council to provide support and recommendations to the Butte CoC Council related to 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.

HMIS Lead Agency

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

Governance, Policy Development and Reporting

- 1) Draft policies, procedures and standards in accordance with the CoC Interim Rule, Proposed HMIS Rule, and current HUD HMIS Data Standards;
- 2) Create and submit a security plan, data quality plan, and a privacy policy to the CoC for approval, to be updated as needed;
- 3) Develop HMIS plans, forms, standards and governance documents in compliance with all applicable regulations,
- 4) Ensure implementation and compliance of policies, procedures and standards;
- 5) Schedule and facilitate HMIS/CES Committee meetings;
- 6) Prepare data reports and analyses to the Butte CoC Council and for submission to HUD and the State of California. Reports include but are not limited to:
 - a. PIT Count;
 - b. HIC;
 - c. LSA:
 - d. Unduplicated counts of clients served annually;
 - e. Count of lodging units in the HMIS;
 - f. HDIS; and
 - g. Other reports as necessary to measure progress in meeting Butte CoC goals;
- 7) Respond to the CoC Council and HMIS/CES Committee directives;
- 8) Ensure participation and compliance by all agencies and programs serving homeless people in HMIS;
- 9) Liaising with HUD regarding federal HMIS standards and regulations;

System Administration and Security

- 1) 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;
- 2) Oversee the day-to-day administration of the HMIS;
- 3) Manage the HMIS Software System Vendor and other HMIS Vendors in compliance with

- current HUD requirements and Proposed HMIS Rule technical standards;
- 4) Retain copies of all contracts and agreements executed for HMIS administration;
- 5) Designate the HMIS Lead as the Security Officer responsible for ensuring compliance with applicable security standards;
- 6) Keep all signed paper and electronic statements for a period of at least 3 years;
- 7) Implement a policy and chain of communication for reporting and responding to security incidents;
- 8) Develop a disaster recovery plan, which includes protocols for communication with staff, CoC and CHOs;
- 9) Complete an annual security review;

Software and Vendor

- 1) Liaising with HMIS software vendor(s);
- 2) Procuring HMIS software and licenses;
- 3) Overseeing software license administration;
- 4) Configuring HMIS software to meet Continuum of Care and/or CHO needs;
- 5) Maintaining HMIS web portal and resource library, including domain registration,

CHO and End User Coordination

- 1) Execute and maintain copies of signed Memoranda of Understanding with CHOs,
- 2) Monitor and enforce CHO compliance with HUD requirements and report on compliance to the CoC and HUD;
- 3) Communicate HUD HMIS Standards updates to all CHO HMIS Administrators;
- 4) Prepare and execute MOU 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 PII and PPI consistent with the agreement.
- 5) Maintain a contact list of all CHO HMIS Administrators and update CHO MOU as needed;
- 6) Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from End Users and CHO HMIS Administrators.
- 7) Document technical issues experienced by End Users;

Training and Technical Assistance

- 1) 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;
- 2) Provide technical assistance and support to CHO HMIS Administrators and EndUsers;

Data Quality

- 1) Develop and implement a Data Quality Plan in coordination with the HMIS/CES Committee;
 - a. 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;
- 2) Coordinate with CHO HMIS Administrators to produce required reports;
- 3) Work with CHO HMIS Administrators related to their programs' data quality reports indicating levels of data entry completion, consistency with program model, and timeliness;

- 4) Provide reports on HMIS participation rates, data quality and other analyses to the Butte CoC Council and HMIS Committee when requested;
- 5) Monitor compliance by all CHOs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review;
- 6) Manage HMIS Software System upgrades and ensure that they comply with the latest HUD Data Standards; and
- 7) Distribute HUD Data Standards and provide guidance to CHOs on compliance.

Contributing HMIS Organizations (CHOs)

CHOs operate program(s), provide services, and enter PII and PPI into HMIS. CHOs must enter into and comply with HMIS MOU, and agree to comply with all Butte CoC and HMIS/CES committee applicable plans, forms, standards and governance documents, in order to contribute data to the HMIS Software System. The HMIS MOU lays out the full responsibilities of the CHO and CHO Administrator, however the principle responsibilities are described below and include:

Privacy

- 1) Uphold confidentiality requirements;
- 2) Obtain a HMIS Client Informed Consent for each Client entered into the HMIS Software System:
- 3) Post the Butte Countywide HMIS Public Notice so it is viewable to all Clients;
- 4) Post the Butte Countywide Continuum of Care Privacy Notice on its Agency's website;

Security

- 1) Designate the CHO HMIS Administrator as the Security Officer that is responsible for ensuring Security Plan compliance for the CHO;
- 2) Conduct criminal background checks on the CHO HMIS Administrator and all End Users;
- 3) Ensure that all End Users receive security training prior to being given access to the HMIS, and a minimum of once annually;
- 4) Monitoring and maintaining security of all staff workstations used for HMIS data entry.
- 5) Ensuring End User adherence to workstation security policies.
- 6) Safeguarding client privacy through compliance with confidentiality and security policies
- 7) Will be subject to periodic on-site security assessments to validate compliance of the agency's information security protocols and technical standards.

Training

- 1) Ensure all CHO HMIS Administrators and End Users participate in comprehensive training curriculum developed by the HMIS LeadAgency.
- 2) Ensure CHO HMIS Administrator and/or designee attend and participate in HMIS/CES Committee meetings a minimum of once per quarter.

Data Quality

- 1) 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.
- 2) Collect program specific data elements, as defined by HUD, for all clients served by programs funded by HUD grants allocated to the Butte CoC.
- 3) Enter client-level data into the HMIS within three (3) business days of client interaction.
- 4) Follow, comply and enforce the CHO HMIS MOU.
- 5) Complete quarterly data compliance checks of agency HMIS programs.

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 HMIS. The CHO HMIS Administrator shall:

- 1) Submit to HMIS Lead all required forms for new End Users, and will ensure CHO is complying with the Butte CoC HMIS Background policy, laid out in this document;
- 2) Be the first point of contact for end users experiencing difficulties using HMIS;
- 3) Maintain End User list within the CHO;
- 4) Monitor End User logins on a monthly basis;
- 5) Update the HMIS Lead agency 2 weeks prior to:
 - a. A program funding source is ending, a new funding source is added;
 - b. A program changes location;
 - c. A program's bed and/or unit inventory changes.
- 6) Run data quality reports indicating levels of data entry completion, consistency with program model, and timeliness; a minimum of once quarterly;
- 7) Complete data entry when End Users are unable to complete data entry;
- 8) Ensure CHO compliance with the protocols of the Data Quality Plan, Security Plan and Privacy Plan;
- 9) Inform the HMIS Lead Agency when critical deadlines regarding data entry are missed;
- 10) Maintain communication with the HMIS Lead Agency and HMIS/CES Committee regarding HMIS data entry challenges and questions;
- 11) Submit requests for new End Users of the HMIS Software System to the HMIS Lead Agency;
- 12) Notify the HMIS Lead Agency within one (1) business day when End User(s) is no longer employed by CHO and/or no longer needs access to HMIS, so their HMIS user account can be deactivated;
- 13) Complete training with the HMIS Lead Agency at least quarterly.
- 14) Attend an HMIS/CES Meeting at a minimum once per quarter.
- 15) Notify all End Users from their agency of system-wide changes and other relevant information:
- 16) Monitors their agency's compliance with standards of confidentiality and data collection, entry and retrieval;
- 17) Ensure Participating Agency adherence to HMIS Policies and Procedures;
- 18) Make continuous efforts to detect violations of privacy and security and respond to any indication or report of violations; and
- 19) Inform HMIS Lead Agency within three (3) business days of changes in Bed and/or Units in any applicable program.

End Users

All HMIS End Users shall:

- 1) Read, initial and sign the End User Agreement:
 - a. The user understands and agrees that they may not publish, disclose, or use any information collected for or contained within the HMIS except as permitted by the Butte CoC HMIS procedures or applicable by law.
 - b. The user understands and agrees that all passwords and/or other security measures assigned to them are to be used solely by them, and are not to be disclosed to or utilized by any other individual.
 - c. The user understands and agrees that if they violate the confidentiality provisions of applicable rules and regulations, they may be subject to termination and/or liability under applicable law.

- d. The user understands and agrees that their obligations under the agreement shall remain in effect following any termination of the agreement or of their employment with the agency listed on the form.
- 2) Complete a New User training with the HMIS Lead Agency;
- 3) Complete training with the HMIS Lead Agency at least annually;
- 4) Maintain security of login and work station;
- 5) Follow the most recent HUD Data Standards;
- 6) Follow data entry standards and data quality as required in the Data Quality Plan;
- 7) Follow protocols as required by the Security Plan and Privacy Plan;
- 8) Enter client-level data into the HMIS within three (3) business days of client interaction;
- 9) Notify CHO HMIS Administrator if data deadlines appear to be in jeopardy;
- 10) Notify CHO HMIS Administrator with any questions, or if the HMIS Software System is not working properly; and
- 11) Read all emails, and notices from the HMIS Lead Agency related to HMIS, and implement any changes in data capture or policies and procedures immediately.

HMIS Software Vendor

The software vendor (Bitfocus) is responsible for the set-up, operation, and maintenance of the HMIS software platform. Additional responsibilities are listed below:

- 1) Address any technical problems that arise with respect to the Bitfocus software and/or functionality;
- 2) Provide system and application updates to ensure the ability of the HMIS to comply with all HUD reporting requirements;
- 3) Interface with HMIS team to ensure that the system meets the needs of the CHOs;
- 4) Provide system security as set out by the HUD technical standards in regards to server, system and user access;
- 5) Schedule necessary and planned downtime when it will have least impact, for the shortest possible amount of time;
- 6) Design and implement a backup and recovery plan (including disaster recovery);
- 7) Comply with any new HUD Data or Technical Standard; and
- 8) The HMIS software vendor's employees will agree to abide by all confidentiality and ethics standards.

HMIS Access Levels

HMIS Access will differ between End Users. Not all End Users will have the same level of access. End User access level will be determined by the programs the End Users is assigned to, the CHO Administrator, and the HMIS Lead. End User access levels may change.

Termination of CHO Access to HMIS

Voluntary Termination of Participation

- 1) The CHO shall inform the HMIS Lead Agency in writing of their intention to terminate their participation in HMIS.
- 2) The HMIS Lead Agency will remove the departing agency from the list of CHOs on the Butte CoC website.
- 3) The HMIS Lead Agency will revoke access of all CHO staff to HMIS. Note: All CHO information contained in the HMIS system will remain in the HMIS system.
- 4) The HMIS Lead Agency will keep all termination records on file with the associated MOU.

Termination of Participation for Lack of Compliance

- 1) When the HMIS Lead Agency determines that a CHO is in violation of the MOU by not fully complying with HMIS plans, forms, standards and/or governance documents, the HMIS Lead Agency will work directly with the CHO's Executive Director to resolve the issue(s) in question.
- 2) If the HMIS Lead Agency and CHO are unable to resolve issue(s), the HMIS/CES committee will be called upon to resolve the issue(s). If that results in a ruling of termination:
 - a. The CHO will be notified in writing by the HMIS Lead Agency of the intention to terminate the CHO's participation in HMIS.
 - b. The HMIS Lead Agency will revoke access of all CHO staff to HMIS. Note: All CHO information contained in the HMIS system will remain in the HMIS system.
 - c. The HMIS Lead Agency will keep all termination records on file with the associated MOU.
 - d. Following an involuntary termination, the CHO has 30 calendar days to appeal in writing to the chair and vice-chair of the HMIS/CES committee for reinstatement to HMIS, provided the CHO has corrected the issue(s) resulting in the initial termination ruling.
 - i. The chair and vice-chair will add the CHO's termination appeal to the agenda of the next HMIS/CES committee meeting.
 - ii. The CHO will present/provide verification to the HMIS/CES committee that the original issue(s) have been corrected and will no longer occur.
 - iii. If the HMIS/CES committee unanimously approves the appeal and reinstatement, the committee will then take the appeal to the CoC Council for approval and reinstatement.
 - e. The Butte CoC is empowered to permanently revoke a CHO's access to HMIS for a serious and/or willful breach of security or confidentiality.

Security Audits

The CHO and CHO Administrator are responsible for preventing degradation of the HMIS resulting from viruses, intrusion, or other factors within the Agency's control. The participating CHO Administrator is responsible for preventing inadvertent release of confidential client-specific information through physical, electronic, or visual access to the workstation.

Each participating CHO Administrator is responsible for ensuring their agency meets the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards. CHOs will conduct a thorough review of internal policies and procedures regarding HMIS, on a quarterly basis.

Quarterly CHO Self-Audits

Quarterly Compliance Certification Checklist

1) The CHO Administrator will use the Compliance Certification Checklist to conduct quarterly security

- audits of all CHO end user workstations.
- 2) The CHO Administrator will audit remote access by associating User IDs, IP addresses and login date/times with employee time sheets. End Users may not remotely access HMIS from a workstation (ie: personal computer) that is not subject to the CHO Administrator's regular audits.
- 3) If areas are identified that require action due to noncompliance with these standards or any element of the Butte CoC HMIS Policies and Procedures, the CHO Administrator will note these on the Compliance Certification Checklist, and the CHO Administrator will work to resolve the action item(s) within thirty (30) calendar days.
- 4) Any Compliance Certification Checklist that includes one (1) or more findings of noncompliance and/or action items will not be considered valid until all action items have been resolved. The Checklist findings, action items, and resolution summary must be reviewed and signed by the CHO Executive Director or other empowered officer prior to being returned to the HMIS Lead Agency.
- 5) The CHO Administrator must turn in a copy of the Compliance Certification Checklist to the HMIS Lead Agency on a quarterly basis.
- 6) CHO Administrator must keep the original signed copy of the Compliance Certification Checklist for a minimum of seven (7) years in their agency files.

Quarterly Data Quality Checklist

- 1) The CHO Administrator will use the Data Quality Compliance Certification Checklist to conduct quarterly security audits of all CHO HMIS programs and HMIS End Users.
- 2) If areas are identified that require action due to noncompliance with these standards or any element of the Butte CoC HMIS Policies and Procedures, the CHO Administrator will note these on the Data Quality Checklist, and the CHO Administrator will work to resolve the action item(s) within thirty (30) calendar days.
- 3) Any Data Quality Checklists that includes one (1) or more findings of noncompliance and/or action items will not be considered valid until all action items have been resolved. The Checklist findings, action items, and resolution summary must be reviewed and signed by the CHO Executive Director or other empowered officer prior to being returned to the HMIS Lead Agency.
- 4) The CHO Administrator must turn in a copy of the Compliance Certification Checklist to the HMIS Lead Agency on a quarterly basis.
- 5) CHO Administrator must keep the original signed copy of the Data Quality Checklist for a minimum of seven (7) years in their agency files.

Annual Comprehensive HMIS Lead Agency Audits of CHO

Unless a more accurate method is available (e.g., client interview, third party verification, etc.), a sampling of client source documentation can be used to measure the data accuracy rate. The HMIS Lead Agency may request client files or intake forms during the annual HMIS Security Certification Checklist process and compare the source information to the information in HMIS. Only those parts of the client(s) file containing the required information will be reviewed, excluding any non-relevant, personal, or Participating Agency-specific information. The HMIS Lead Agency shall provide Participating Agencies the training and tools necessary for Participating Agencies to self-monitor project performance.

- 1) The HMIS Lead will schedule the annual comprehensive security audit a minimum of thirty (30) calendar days in advance with the CHO Administrator.
- 2) The HMIS Lead will use the Compliance Certification Checklist to conduct security audits.
- 3) The HMIS Lead must randomly audit at least 10% of the workstations for each HMIS CHO. In the event that an agency has more than 1 program site, minimum of 1 workstation per program site must be audited.
- 4) If areas are identified that require action due to noncompliance with these standards or any element of the Butte CoC HMIS Policies and Procedures, the CHO Administrator will note these on the Compliance Certification Checklist, and the CHO Administrator will work to resolve the action item(s) within thirty (30) calendar days.

5) Any Compliance Certification Checklist that includes one (1) or more findings of noncompliance and/or action items will not be considered valid until all action items have been resolved and the Checklist findings, action items, and resolution summary has been reviewed and signed by the CHO Executive Director or other empowered officer and returned to the HMIS Lead Agency.

Physical Safeguards

In order to protect client privacy it is important that the following physical safeguards be put in place. For the purpose of this section, authorized persons will be considered only those individuals who have completed HMIS/Privacy and Security training within the past 12 months.

- 1) Computer Location Computer must be in a secure location where only authorized persons have access. Computer must not be accessible to clients, the public or other unauthorized CHO staff members or volunteers.
- 2) Printer location Documents printed from HMIS must be sent to a printer in a secure location where only authorized persons have access.
- 3) PC Access (visual) Non-authorized persons should not be able to see an HMIS workstation screen. Monitors should be turned away from the public or other unauthorized CHO staff members or volunteers and utilize visibility filters to protect client privacy.
- 4) Under no circumstances will End Users store HMIS data, client PII or PPI on any personally owned media; End Users may not place PII or PPI on a work-owned USB drive for personal use.
- 5) PII, PPI and removable data devices (e.g., USB drives, CDs, and external drives) must be protected by appropriate physical means from modification, theft, or unauthorized access. Such records and confidential information contained therein remain subject to the HMIS Policies and Procedures. When these media have reached the end of their useful life, the data will be disposed of in a manner consistent with the procedures outlined in this policy.

Reporting Security Incidents

These Security Standards and the associated Butte CoC HMIS Policies and Procedures are intended to prevent, to the greatest degree possible, any security incidents. However, should a security incident occur, the following procedures should be followed in reporting.

- 1) Any HMIS End User who becomes aware of or suspects a breach of HMIS system security and/or client privacy by another end user, they must immediately report that breach to the CHO Administrator. **Notification must occur within one (1) hour and in writing.**
- 2) Any HMIS End User who becomes aware of or suspects a breach of HMIS system security and/or client privacy by the CHO Administrator, must immediately notify the HMIS Lead Agency.

 Notification must occur within one (1) hour and be in writing.
- 3) In the event of a breach resulting from suspected or demonstrated noncompliance by an End User with the HMIS End User Agreement, the CHO Administrator should immediately contact the HMIS Lead, in writing, and request End User's User ID be deactivated until an internal agency investigation has been completed.
- 4) Following an internal investigation, the CHO Administrator shall notify the HMIS Lead Agency of any substantiated incidents that may have resulted in a breach of HMIS system security and/or client privacy (whether or not a breach is definitively known to have occurred). If the breach resulted from suspected or demonstrated noncompliance by an End User with the HMIS End User Agreement, the HMIS Lead reserves the right to deactivate the User ID for the End User in question pending further investigation.
- 5) Within 1 business day after the HMIS Lead receives notice of the breach, the HMIS Lead and CHO Administrator will jointly establish a corrective action plan to analyze the source of the breach and actively prevent future breaches. The action plan shall be implemented as soon as possible, and the total term of the plan must not exceed thirty (30) calendar days.
- 6) If the CHO is not able to meet the terms of the action plan within the time allotted, the HMIS Lead

- Agency, in consultation with the HMIS/CES committee, may elect to terminate the CHO's access to HMIS. The CHO may appeal to the HMIS/CES committee for reinstatement to HMIS following completion of the requirements of the action plan.
- 7) In the event of a substantiated breach of client privacy through a release of PPI in noncompliance with the provisions of the Security Standards, the Butte CoC HMIS Policies and Procedures, or the CHO Privacy Statement, the HMIS Lead will attempt to notify any impacted individual(s).
- 8) The HMIS Lead Agency will notify the appropriate body of the Continuum of Care of any substantiated release of PPI in noncompliance with the provisions of the Security Standards, the Butte CoC HMIS Policies and Procedures, or the CHO Privacy Statement.
- 9) The HMIS Lead Agency will maintain a record of all substantiated releases of PPI in noncompliance with the provisions of these Security Standards, the Butte CoC HMIS Policies and Procedures, or the Partner Agency Privacy Statement for 7 years.
- 10) The Butte CoC reserves the right to permanently revoke a Partner Agency's access to HMIS for a breach of security or privacy.

Disaster Recovery Plan

Disaster Recovery for the Butte CoC HMIS will be conducted by the HMIS software vendor. However, the HMIS Lead Agency must be familiar with the disaster recovery plan set in place by the HMIS software vendor.

- 1) The HMIS Lead should maintain ready access to the following information:
 - a. Contact information Phone number and email address of the HMIS Vendor.
- 2) CHO responsibilities A thorough understanding of the agency's role in facilitating recovery from a disaster.
- 3) All HMIS Lead Agency personnel should be aware of and trained to complete any tasks or procedures for which they are responsible in the event of a disaster.

Background Checks for HMIS Users

The Butte CoC recognizes the sensitivity of the data in HMIS, and therefore requires individuals responsible for managing, entering and/or accessing HMIS data be subject to a criminal background check.

No prospective end user or CHO HMIS Administrator will be given HMIS access if he, she or they have entered a plea of nolo contendere (no contest) or has been found guilty of any misdemeanor or felony fraud (including but not limited to) identity theft, stalking, human trafficking or any related crimes. HMIS Participating Agencies cannot risk the privacy and confidentiality of client information by allowing HMIS access to any individual who pled nolo contendere or been found guilty of the aforementioned crimes. In the broadest sense, a fraud is an intentional deception made for personal gain or to damage another individual. HMIS participating agencies are solely responsible for conducting background checks on their employees or contract workers, who will be accessing HMIS, and are responsible for any associated costs.

The background check must include local and state records; agencies are strongly encouraged to include federal records as well. Background checks must be run in accordance with state law. Background timelines should include the last 7 years. Background checks that come back with a criminal history should be carefully considered prior to giving an employee access to client information. If a HMIS participating agency is unsure if a prospective HMIS End User's criminal history could or should preclude them from accessing HMIS, they must contact the CoC's HMIS Lead to determine eligibility prior to submitting a request to grant the End User access.

A background check may be conducted only once for each person unless otherwise required, and the results of the background check must be retained in the employee's personnel file through the term of their employment. All End Users must have a completed background check prior to access being requested to HMIS by a CHO. Criminal background checks must be completed on all new End Users and CHO HMIS Administrators, and the "Background Check Review and Verification Statement" must be signed by the Agency's Director, the CHO HMIS Administrator, Page | 21 of 28

or the Head of the HR Department.

HMIS Password Requirements

The HMIS System Administrator will issue a temporary password for each CHO end user. The user will be prompted to create a new password upon first login. Passwords must be no less than eight (8) characters in length, and must meet the following criteria:

- Minimum 8 characters in total length
- Contain upper-case letters (e.g., H)
- Contain lower-case letters (e.g., h)
- Contain Numbers (e.g., 9)
- Cannot contain your first or last name
- Contain special characters (e.g. ~!@#\$%^&*()_)
- Not using, or including, the username, the HMIS name, or the HMIS vendor's name
- Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

HMIS passwords will expire after ninety (90) calendar days and must be changed. End Users will be prompted to change their password, via an automated email two (2) weeks prior to their password expiring.

Two Factor Authentication

Two-factor authentication adds an additional layer of security to the authentication process by making it harder for attackers to gain access to a person's devices or online accounts because, even if a user's password is hacked, a password alone is not enough to pass the authentication check.

In order to log into the HMIS live site or the HMIS training site all users will be required to provide two (2) separate pieces of information to confirm their identity and access the system. Users will enter their username and password, and a 6-digit verification code to log into HMIS. Users who enter an incorrect code more than five (5) times in a minute will be locked out of their account. End Users will receive their 6-digit verification code via the email address associated with their HMIS account or by using Google Authenticator or Microsoft Authenticator.

Password Reset

If an end user needs to reset their password for any reason, email HMIShelp@buttecounty.net. Assistance with password resets is only available Monday through Friday from 8am to 4:30pm (excluding holidays).

Unsuccessful Login

If an end user unsuccessfully attempts to login three (3) times, by entering an incorrect password, the user ID will be "locked out". Meaning access permission will be revoked, and user will be unable to gain access for 60 minutes or until their password is reset by the HMIS System Administrator.

Data Collection Requirements

CHOs will collect and verify the minimum set of data elements for all clients served by their programs. Universal Data Elements and Program Specific Data Elements are subject to change based on HUD Data Standards, HUD requirements, and HUD updates.

Universal Data Elements (UDE)

The universal data elements include:

3.7 Veteran Status

3.8 Disabling Condition

| 3.1 Name | 3.10 Project Entry Date |
|----------------------------|--|
| 3.2 Social Security Number | 3.11 Project Exit Date |
| 3.3 Date of Birth | 3.12 Destination |
| 3.4 Race & Ethnicity | 3.15 Relationship to Head of Household |
| 3.6 Gender | 3.16 Client Location |

3.20 Housing Move-in Date

3.917 Prior Living Situation

Program-Specific Data Elements (PDE)

The program-specific data elements include:

| 4.2 Income and Sources | 4.13 Date of Engagement |
|-------------------------------|------------------------------------|
| 4.3 Non-Cash Benefits | 4.14 Bed-Night Date |
| 4.4 Health Insurance | 4.15 Financial Assistance Provided |
| 4.5 Physical Disability | 4.19 Coordinated Entry Assessment |
| 4.6 Developmental Disability | 4.8 HIV/AIDS |
| 4.7 Chronic Health Condition | 4.9 Mental Health Disorder |
| 4.11 Domestic Violence | 4.10 Substance Abuse Disorder |
| 4.12 Current Living Situation | 4.20 Coordinated Entry Event |

Federal Partner Program Data Elements

Federal partner Program Data Element include UDE and PDE listed above. Additional data elements are dependent on funding source and program type. More information can be found by reading the most recent **HUD HMIS Data Standards.**

Policies

Client data will be gathered according to the policies, procedures and confidentiality rules of each individual program.

- 1) Client data may only be entered or imported into HMIS if the client has provided informed consent, as demonstrated by a signed HMIS Client Informed Consent.
 - Client's information must be entered into HMIS based on the sharing level the client authorized on the HMIS Client Informed Consent.
- Victim service providers may not directly enter or provide client-level data to HMIS. 2)
- 3) Each CHO is responsible for collecting and entering, at a minimum, all of the elements required by HUD whether or not they are required to do so by their funding source.
 - a. CHOs must also collect data fields locally identified for specific projects; and
 - CHOs shall enter data into the HMIS in real time or within three (3) business days of b. collecting the information. At minimum, data entered must include Universal Data Elements (UDEs). Program-Specific Data Elements (PDEs) are required to be entered

- as outlined in the most recently published HMIS Data Standards Manual.
- c. CHOs may also be required to collect additional data fields locally identified to support specific regional projects.
 - i. "Client Doesn't Know" and "Client Prefers Not to Answer" must only be used to indicate the client did not know or the client declined to provide the data.
 - ii. "Data Not Collected" must only be used to indicate the data was not collected. CHOs understand and agree that "Data Not Collected" should not be used unless there is no other option. If "Data Not Collected" is used, End Users should make all efforts to collect and enter missing data within three (3) business days.
- 4) The CHO that creates a client record owns the responsibility for a baseline of data quality to include: non-duplication of the client record, HMIS Client Informed Consent, Universal & Program Level Data Elements as defined by HUD Data Standards, and Program Entries and Exits. Quality assurance shall be the ultimate responsibility of each CHO.
- 5) The CHO that enrolls a client into a program owns the responsibility for a baseline of data quality to include: Universal Data Elements (UDE) and Program-Specific Data Elements (PDE) as defined by HUD Data Standards, and Program Entries and Exits. Quality assurance shall be the ultimate responsibility of each CHO.
- 6) All HMIS CHOs shall be committed to timely, accurate and complete entry of client specific data into HMIS in order to provide program managers and local policy makers with reports that facilitate strategic planning.

Public Notice

The *Butte Countywide Homeless Information Systems (HMIS) Public Notice* (Appendix A) must be posted at all workstations in which intakes, interviews or where HMIS data is being gathered so it is viewable to all clients.

Privacy Notice

The *Butte Countywide Continuum of Care Privacy Notice (Privacy Notice)* (Appendix B) specifically details Uses and Disclosures of Protected Personal Information (PPI). This Privacy Notice applies to all CHOs. 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.

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.

Data Quality and Completeness

All data entered into the HMIS shall be complete. Partially complete or missing data (whether UDE or PDE) can negatively affect the ability to provide comprehensive care to clients. Missing data can affect a CHOs ability to access and/or retain funding, and can negatively affect a client's ability to become permanently housed and end their homelessness.

The goal is to collect one hundred percent (100%) of all data elements. However, the Butte CoC recognizes this may not be possible in all cases. Therefore, it has established an acceptable range of Missing (null) and Incomplete (Client Doesn't Know/Client Prefers Not to Answer) responses, depending on the data element and the type of project entering data.

All projects using the HMIS shall enter data on one hundred percent (100%) of the clients they serve, and meet a data quality benchmark of < 5% error on all data collected.

Accuracy

All data entered into the HMIS shall be a reflection of information provided by the client. Intentionally recording inaccurate information is strictly prohibited. All data in HMIS shall be collected and entered in a common and consistent manner across all projects. Only when a client prefers not to provide personal information and the program funder does not prohibit it, is it permissible to enter client data under an alias. Participating Agencies are responsible to their program's funding source for any duplication of services that results from entering false information (i.e., hiding the actual name under an alias).

Timeliness

Participating Agencies are expected to enter data into the HMIS in real time or within three (3) business days of collection and/or client interaction.

CHO Administrators must pull Data Quality reports on a minimum of a quarterly basis, to review/audit CHO End Users Data Quality, and ensure accuracy and timeliness. If CHO Administrator finds CHO End Users are not compliant with Data Quality, accuracy and timeliness, CHO Administrator will work with End Users to correct and ensure compliance.

Bed/Unit Utilization Rates

Acceptable range of bed/unit utilization rates for established projects are as follows:

- Emergency Shelters (ES): 75%-105%;
- Transitional Housing (TH): 80%-105%; and
- Permanent Supportive Housing (PSH): 85%-105%.

Projects outside of this acceptable range may provide a brief explanation to the HMIS Lead Agency. New projects may require time to reach the projected occupancy numbers and will not be expected to meet the utilization rate requirement during the project's first operating year.

Should an agency have a question regarding utilization rates they should contact the agency's CHO Administrator or the HMIS Lead Agency for direction.

Data Validity

Data Validity refers to all End Users defining and interpreting data elements the same way. HMIS uses HUD definitions. These definitions may differ from common verbiage and from State definitions. It is crucial that when entering information into HMIS that End Users are cognizant of HUD definitions and communicate these definitions to the clients they serve, to ensure information entered into HMIS is correct and valid.

Should an End User have a question regarding HMIS definitions or how to interpret a data element they should contact the agency's CHO Administrator or the HMIS Lead Agency for direction.

Release and Disclosure of Client Data

Policies

Client-specific data from HMIS may be shared with CHOs, and only when the sharing agency has secured informed consent authorizing such sharing, as demonstrated by a signed HMIS Client Informed Consent form, and only during such time that HMIS Client Informed Consent is valid (before its expiration).

Other non-HMIS inter-agency agreements **do not** cover the sharing of HMIS data. Sharing of client data may be limited by program specific confidentiality rules.

- 1) No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal.
- 2) Services may NOT be denied if the client refuses to sign the Client Informed Consent and Release of Information Authorization or declines to state any information.
- 3) Aggregate data that does not contain any client-specific identifying data may be shared with internal and external agents without specific permission.

Procedures

HMIS Client Informed Consent constitutes informed consent. The burden rests with the CHO and CHO End User to inform the client about the purpose and function of HMIS data before asking for consent. As part of informed consent, a notice must be posted in the intake area explaining the reasons for collecting the data, the client's rights with regard to data collection, and any potential future uses of the data. An example of such a sign may be found in the Butte CoC website (https://www.buttehomelesscoc.com/).

- 1) CHO End Users must obtain a new signed Informed Consent and enter it into HMIS if the client's original release has expired, or will expire within thirty (30) calendar days.
- 2) If a client signs a HMIS Informed Consent, but chooses not to share information with other CHOs, End Users' data collection and data entry practices should follow the workflow and specific data entry guidelines established in the HMIS End User Manual to prevent sharing of client assessment information.
- 3) End Users or CHO Administrators will not share client-specific HMIS data with any person who is not also a current HMIS End User, either within their own agency or with other agencies.

Technical Support Protocol

Support requests include problem reporting, requests for enhancements (features), or other general technical support. The HMIS Lead Agency will only provide support for issues specific to the HMIS software and systems.

The process for requesting technical support or making technical recommendations is as follows:

- 1) HMIS users should first seek technical support from the CHO HMIS Administrator.
- 2) If more expertise is required to further troubleshoot the issue, CHO HMIS Administrator or end user will contact the HMIS Lead Agency by emailing HMIShelp@buttecounty.net
 - a. The email should provide issue details if possible (or help recreate the problem by providing all information, screenshots, reports, etc.) in order for the HMIS Lead Agency to recreate the problem.
 - b. The HMIS Lead will try to respond to all email inquiries and issues within 1 business day, but support load, holidays, and other events may affect response time.
- 3) If necessary, the HMIS Lead Agency will submit a ticket to vendor if progress is stalled.
- 4) If the support request is deemed by the HMIS Lead agency to be an agency-specific customization,

- (agency-specific customizations include but are not limited to new assessments, new data fields, and new pick-lists), resolution of the request may be prioritized accordingly.
- 5) Requests for technical support will be processed in priority order according to their severity and impact.

Client Rights

Clients have the right to see and receive a copy of the information that the HMIS maintains about them, except for information compiled in anticipation of litigation, information about another individual, information obtained under a promise of confidentiality, or information that would, if disclosed, endanger the life or safety of another.

- 1) Clients have a right to privacy and confidentiality;
- 2) Clients have a right to not answer any questions unless entry into the Agency's program requires it;
 - a. If a client refuses to answer HMIS required question, the client cannot be denied services, and the end user will not attempt to force a client to provide information they are not comfortable sharing.
- 3) Client information may not be shared without informed consent (posting of Privacy Notice and a signature authorizing that the client is willing to share their information between CHOs on the Butte Countywide Continuum of Care Informed Consent).
- 4) Every client has a right to an understandable explanation of the Informed Consent form, HMIS and what "consent to participate" means. The explanation shall include:
 - a. Type of information collected;
 - b. How the information will be used;
 - c. Under what circumstances the information will be used;
 - d. That refusal to provide consent to collect information shall not be grounds for refusing entry to the program;
 - e. A copy of the consent shall be given to the client upon request and a signed copy shall be uploaded into the client's HMIS file; and
 - f. A copy of the Privacy Notice shall be made available upon client request.

Appendices of Forms

- Appendix A; HMIS Public Notice
- Appendix B; HMIS Privacy Notice
- Appendix C; End User Agreement
- Appendix D; HMIS Informed Consent
- Appendix E; HMIS Participating Agency List
- Appendix F; CES Participating Agency List
- Appendix G; Quarterly Compliance Checklist
- Appendix H; Quarterly Data Quality Checklist

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/

2024 HMIS Data Standards, U.S. Dept. of Housing and Urban Development https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf

2024 HMIS Data Dictionary, U.S. Dept. of Housing and Urban Development https://files.hudexchange.info/resources/documents/HMIS-Data-Dictionary-2024.pdf

Document Revision History

| Date | Version | Editor/Author | Notes |
|------------|---------|-----------------|---|
| 9/20/2023 | 1.0 | Elisa Rawlinson | Initial Draft - New Version of Policies & |
| | | | Procedures |
| 10/23/2023 | 1.0 | HMIS/CES | Approved by HMIS/CES Committee |
| | | Committee | |
| | | | |
| | | | |

Appendix A; HMIS Public Notice

Butte Countywide Homeless Information Systems (HMIS) Public Notice

We collect personal information directly from you to:

- 1. Best connect you with the services you need;
- 2. Better understand the needs of homeless persons;
- 3. Improve planning to eliminate homelessness; and
- 4. Improve services for homeless persons.

The only people who will be allowed to see your information are HMIS trained staff for homeless service providers who have agreed to keep your information confidential. Additional details regarding data collection and sharing are discussed in our Privacy Notice. If you would like a copy of our Privacy Notice, please ask.

Appendix B; HMIS Privacy Notice

Butte Countywide Continuum of Care Privacy Notice

Adopted November 16, 2020

A. Scope of Notice

- 1. This notice describes the privacy policy and practices of Butte Countywide Homeless Continuum of Care (Butte CoC) and Name of Homeless Organization, a Contributing HMIS Organization (CHO). Our main office is at Address, email/web address, telephone of Homeless Organization.
- 2. A Homeless Management Information System (HMIS) is a software system used to collect data on the housing and services provided to homeless individuals and families and persons at risk of homelessness. All homeless assistance programs that are a part of the Butte CoC must participate in the HMIS, and are called Contributing HMIS Organizations (CHOs). CHO's are required to collect universal data elements from all clients, including Protected Personal Information (PPI).
- 3. The policy and practices in this notice cover the processing of PPI HMIS for clients of Name of Homeless Organization.
- 4. Protected Personal information (PPI) is any information we maintain about a client that:
 - a. allows identification of an individual directly or indirectly
 - b. can be manipulated by a reasonably foreseeable method to identify a specific individual or
 - c. can be linked with other available information to identify a specific client
- 5. When this notice refers to personal information, it means PPI.
- 6. All personal information that we maintain is covered by the policy and practices described in this privacy notice. if programs provided by your agency have additional privacy requirements, please add that information here: for example "Personal information that the medical clinic collects and maintains is covered by a different privacy policy". Or Delete this text.
- 7. We adopted this policy because of standards for HMIS issued by the Department of Housing and Urban Development. We intend our policy and practices to be consistent with those standards. See 69 Federal Register 45888 (July 30, 2004).
- 8. This notice tells our clients, our staff, and others how we process personal information. We follow the policy and practices described in this notice.
- 9. We may amend this notice and change our policy or practices at any time. Amendments may affect personal information that we obtained before the effective date of the amendment.
- 10. We give a written copy of this privacy notice to any individual who asks.

11. A copy of this notice can be found on the HMIS/CES page of the Butte CoC website at www.buttehomelesscoc.com

B. <u>Data Collection and Purpose</u>

- 1. We collect personal information only when appropriate to provide services or for another specific purpose of our organization or when required by law. We may collect information for these purposes:
 - a. to provide or coordinate services to clients
 - b. to locate other programs that may be able to assist clients
 - c. for functions related to payment or reimbursement from others for services that we provide
 - d. to operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions
 - e. to comply with government reporting obligations
 - f. when required by law
- 2. We only use lawful and fair means to collect personal information.
- 3. We normally collect personal information with the knowledge or consent of our clients. If you seek our assistance and provide us with personal information, we assume that you consent to the collection of information as described in this notice.
- 4. We may also get information about you from other CHOs within the Butte CoC.
- 5. We post a sign at our intake desk or other location explaining the reasons we ask for personal information. The sign says:

We collect personal information directly from you to:

- 1. Best connect you with the services you need;
- 2. Better understand the needs of homeless persons;
- 3. Improve planning to eliminate homelessness; and
- 4. Improve services for homeless persons.

The only people who will be allowed to see your information are HMIS trained staff for homeless service providers who have agreed to keep your information confidential. Additional details regarding data collection and sharing are discussed in our Privacy Notice. If you would like a copy of our Privacy Notice, please ask.

C. Permitted Uses and Disclosures

1. We use or disclose personal information for activities described in this part of the notice. We may or may not make any of these uses or disclosures with your information. We assume that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures:

- a. to connect individuals to appropriate resources or services, for housing prioritization purposes, and for determining an individual's progress in programs or services
- b. for functions related to payment or reimbursement for services
- c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
- d. to create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients
- e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
- f. to avert a serious threat to health or safety if
 - (1) we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
 - (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat
- g. to report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence
 - (1) under any of these circumstances:
 - (a) where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law
 - (b) if the individual agrees to the disclosure, or
 - (c) to the extent that the disclosure is expressly authorized by statute or regulation, and
 - (I) we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims, or
 - (II) if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.

and

- (2) when we make a permitted disclosure about a victim of abuse, neglect or domestic violence, we will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:
 - (a) we, in the exercise of professional judgment, believe informing the individual would place the individual at risk of serious harm, **or**
 - (b) we would be informing a personal representative (such as a family member or friend), and we reasonably believe the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as we determine in the exercise of professional judgment.
- h. for academic research purposes
 - (1) conducted by an individual or institution that has a formal relationship with the CHO if the research is conducted either:

- (a) by an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a designated CHO program administrator (other than the individual conducting the research), or
- (b) by an institution for use in a research project conducted under a written research agreement approved in writing by a designated CHO program administrator.

and

- (2) any written research agreement:
 - (a) must establish rules and limitations for the processing and security of PPI in the course of the research
 - (b) must provide for the return or proper disposal of all PPI at the conclusion of the research
 - (c) must restrict additional use or disclosure of PPI, except where required by law
 - (d) must require that the recipient of data formally agree to comply with all terms and conditions of the agreement, and
 - (e) is not a substitute for approval (if appropriate) of a research project by an Institutional Review Board, Privacy Board or other applicable human subjects protection institution.
- i. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
 - (1) in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena
 - (2) if the law enforcement official makes a written request for PPI that:
 - (a) is signed by a supervisory official of the law enforcement agency seeking the PPI
 - (b) states that the information is relevant and material to a legitimate law enforcement investigation
 - (c) identifies the PPI sought
 - (d) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought, and
 - (e) states that de-identified information could not be used to accomplish the purpose of the disclosure.
 - (3) if we believe in good faith that the PPI constitutes evidence of criminal conduct that occurred on our premises
 - (4) in response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics, or
 - (5) if
 - (a) the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others), and
 - (b) the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.

and

- j. to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.
- 2. Before we make any use or disclosure of your personal information that is not described here, we seek your consent first.

D. Client Control Over Data

- 1. You may inspect and have a copy of your personal information that we maintain. We will offer to explain any information that you may not understand.
- 2. We will consider a request from you for correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or we may choose to mark it as inaccurate or incomplete and to supplement it with additional information.
- 3. To inspect, get a copy of, or ask for correction of your information, ask an agency staff member for assistance, contact this organization at Address, email/web address, telephone of Homeless Organization, or email <u>ButteCoC@buttecounty.net</u>.
- 4. We may deny your request for inspection or copying of personal information if:
 - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings
 - b. the information is about another individual (other than a health care provider or homeless provider)
 - c. the information was obtained under a promise or confidentiality (other than a promise from a health care provider or homeless provider) and if the disclosure would reveal the source of the information, **or**
 - d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
- 5. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the personal information that we maintain, documentation of the request and the reason for the denial.
- 6. We may reject repeated or harassing requests for access or correction.

E. Data Quality

- 1. We collect only personal information that is relevant to the purposes for which we plan to use it. To the extent necessary for those purposes, we seek to maintain only personal information that is accurate, complete, and timely.
- 2. We have a plan to dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, we may choose to remove identifiers from the information.

3. We may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

- 1. We accept and consider questions or complaints about our privacy and security policies and practices. You can complain about our privacy and security policies by writing to: Butte County DESS Housing and Homeless Branch, 202 Mira Loma Drive, Oroville, CA 95965 or e-mailing ButteCoC@buttecounty.net. You will receive a response in writing postmarked or date stamped within five working days if a valid email address or mailing address is provided in the written complaint.
- 2. All members of our staff (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy notice. Each staff member must receive and acknowledge receipt of a copy of this privacy notice.

G. Privacy Notice Change History

1. Version 1.0, 11-16-2020, Initial Policy

Appendix C; End User Agreement

Contributing HMIS Organization End User Agreement

Butte Countywide Continuum of Care Homeless Management Information System

| Agency Name |
|---|
| |
| End User Name (Agency Employee) |
| The Butte Countywide Homeless Continuum of Care (Butte CoC) Homeless Management Information System (HMIS), is a local information technology system used to collect client-level data, and data on the provision of housing and services to homeless individuals and families. The system enables local homeless service providers to coordinate and streamline client services. HMIS data is required by many state and federal funding sources, and is used to determine funds related to homelessness and homeless services. |
| As an End User of HMIS, you have a moral and legal obligation to ensure client data is collected, accessed, and used appropriately. Misuse of data can result in you being held legally and criminally liable under both State and federal law. End Users and the Contributing HMIS Organization (CHO) HMIS Administrator must ensure client data is collected, entered, accessed and used only on a need to know and right to know basis. |
| The Butte CoC is committed to maintaining the confidentiality of client information and protecting clients' rights. To ensure compliance with this obligation, review, and initial each item below. By initialing and signing this form you are indicating you understand and comply with the requirements related to being a HMIS End User: |
| I understand that I have an obligation to maintain client privacy and to protect and safeguard the confidentiality of a client's Personal Identifiable Information (PII). PII includes, but is not limited to, client's name, address, telephone number, social security number, date of birth, type of care provided, medical condition or diagnosis, veteran status, employment information, and any and all other information relating to the services provided to the client by this or other agencies. |
| I will receive, complete and pass HMIS training in the HMIS training site before being granted access to the live HMIS program. |
| I understand once I have access to the live site, I will be required to re-sign this End User Agreement. Additionally, every 6 (six) months, the live site will require me to re-sign this agreement. |
| I will participate in annual HMIS update training as long as I am an End User. |
| I have read and will abide by all the HMIS Policies and Procedures, including data standards required by the Data Quality Plan and protocols required by the Security and Privacy Plans. |
| I understand the HMIS Policies and Procedures, the Data Quality Plan, and the Security and |
| |

| Privacy Plans are dynamic, meaning they can and will be modified, and I am responsible for complying with any changes made to these plans. |
|--|
| I understand that my username and password are for my use only and must not be shared with anyone, including but not limited to another End User, and my agency's CHO HMIS Administrator. |
| I must take all reasonable means to keep my password secure, including but not limited to never selecting the option to have my browser save my password. |
| If I am logged into HMIS and need to leave the computer, tablet, phone or other mobile device or work area for any amount of time, I will log off the software, close the browser and lock the device before leaving. |
| I understand my computer, tablet, phone or other mobile device must have password protected screensavers set at no more than 15 minutes. |
| If I use a laptop computer, tablet, phone or any other mobile device to enter HMIS data, I will not use that for unauthorized purposes or from unauthorized locations. |
| I will notify my CHO HMIS Administrator if deadlines appear to be in jeopardy, if the HMIS Software System is not working correctly, or if I have any other questions. |
| I understand that only authorized End Users and agency CHO HMIS Administrators can view HMIS information, and not all End Users can view all information. |
| I will ensure HMIS data and client interactions are entering into the system within 3 days. |
| I will ensure that paper documentation or physical files are complete, secure, and confidential at all times, and when no longer needed, are properly destroyed to maintain confidentiality. |
| I may only view, obtain, disclose, or use database information necessary to perform my job. As an HMIS user, I understand I may not look up a client in HMIS to know their whereabouts, their history or current information for the purposes of outside inquiries or personal use. |
| I understand that I can be held legally liable for any unauthorized access, usage, or disclosure of data collected for the purpose of entering into the HMIS database and data held within HMIS as specified in the California Penal Code Section 502 and/or under other State and federal laws. |
| I agree I will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities, including but not limited to law enforcement agencies. |
| I will not discuss client's personal or other information in a public area. |
| I will not electronically transmit unencrypted client data across a public network. I understand |

| If I notice or suspect a security breach committed immediately notify the HMIS Lead Agency. Notification | • |
|---|---|
| writing I will not knowingly enter malicious or erroneous ir | nformation into HMIS. |
| The appropriate client Informed Consent form mediata is to be entered into HMIS and uploaded to the clien | |
| I understand that my username and password will will not be passed on to the staff person that replaces me | • • |
| I understand these rules apply to all HMIS Users, | whatever their work role or position. |
| I have completed the required criminal background I am not allowed to access HMIS if I have ever had a felor guilty of or entered a plea of nolo contendere (no contest) trafficking or related charges. | ny or misdemeanor conviction, been found |
| You are required to maintain strict confidentiality of inform CoC HMIS. Data and information will be used only for less of the above-named agency. Any breach of confidentiality above will result, at a minimum, in your immediate and Butte CoC HMIS. | egitimate client service and administration y or failure to comply with the terms listed |
| End User Signature | Date |
| End Oser Signature | Date |
| CHO Administrator | Date |

Appendix D Informed Consent

| ADDENDIX D. IIIIDINIEU CONSEIL | |
|---|----|
| Appendix D: Informed Consent Client Name: Client DO | B: |

Butte Countywide HMIS Client Informed Consent

PERMISSION TO SHARE PROTECTED IDENTIFYING INFORMATION (PII) TO SECURE NECESSARY SERVICES

Please read the following notice and authorization (or ask to have it read to you) before signing.

Long (Enter your Agency's name in the space) is a Partner Agency in the Butte Countywide Homeless Management Information System (HMIS). HMIS is a shared housing and homeless services database. HMIS operates over the Internet, and uses many security protections to keep your information private and secure.

HOW YOU WILL BENEFIT FROM PROVIDING YOUR CONSENT TO SHARE YOUR PERSONAL INFORMATION:

The information collected in the HMIS is for the purpose of finding out what kind of services you and your family are in need of. The personal information contained in the HMIS database may be shared with Partner Agencies to find and set up the most effective services and resources within the community for you and your family. As you receive services, information will be collected about you, the services provided to you, and the outcomes these services help you to achieve. The information shared may consist of the following Protected Identifying Information (PII):

- Name
- Date of Birth
- Social Security Number
- Gender
- Ethnicity & Race
- Residence Prior to project entry
- Current & historical housed and unhoused status
- Family composition
- Alcohol & Drug history*
- Information about services provided by HMIS participating agencies (including: date, duration, type of service and other similar service information)

- Legal history
- Domestic Violence**
- Income & Non-Cash benefit information
- VI-SPDAT
- Photo
- Veteran Status
- Employment Status
- Disabling condition (physical and/or mental health)

Your information will not be shared with any agencies outside of the Butte Countywide HMIS, unless we are required to do so by law.

Right to Decline or Revoke: I understand that I have the right to not share my information or to stop sharing my information at any time by writing to: Housing and Homeless Branch, 202 Mira Loma Drive, Oroville, CA 95965 or emailing ButteCoC@buttecounty.net. May also call 530-552-6200 and select option to speak with Housing Navigator or you can inform the agency you are working with and they will email the Housing and Homeless Branch of Butte County Department of Employment and Social Services.

Expiration/Renewal: I understand this Consent is good for 3 years from the date of my signature below OR until I cancel my consent. I understand that if I cancel my Consent, all information about me already in the database will remain, but will become invisible to all of the participating agencies.

Other Rights: I understand that sharing my information is voluntary and I can refuse to sign this consent form. I understand if I refuse to sign this Consent, I will still receive services, but they may be limited or delayed. I understand I have the right to see the client confidentiality policies used by the HMIS Partner Agencies.

^{*}Alcohol and Drug history information will not prevent you receiving homeless services and/or housing assistance.

^{**}Domestic Violence information is provided by you during your assessment to be on the list for available housing.

Butte Countywide HMIS Client Informed Consent

Right to a Copy of My Information: I understand that I may have a copy of the information collected in HMIS by Partner Agencies.

| Authorized Participating Agencies the Butte Countywide CoC Website | : The current list of Butte Countywide HI e www.buttehomelesscoc.com | MIS Participating Agencies is available on |
|--|--|--|
| • | 18 in household, if any (first and last name | s): |
| 1 | 2 | |
| 3 | 4 | |
| 5 | 6 | |
| Partner Agencies. ORI give consent for my/our b | HMIS. I understand that I may have a copy asic and relevant information to be entere HMIS. The information gathered and prep | |
| Client's Signature | Date | |
| ☐ Verbal Consent obtained by ph | one (Agency Staff Initials): D | Pate: |
| Agency Personnel Name (print) | Agency Personnel Signature | Date |

Note: A separate HIPAA-compliant authorization is required for disclosure of any patient health information, including mental health and drug and alcohol information protected by any State or Federal privacy law including, but not limited to, Health Insurance Portability and Accountability Act ("HIPAA"), 45 C.F.R. parts 160 and 164, California Confidentiality of Medical Information Act ("CMIA"), Civil Codes sections 56-56.16, Welfare and Institutions Code section 5328, or 42 C.F.R. part 2.1 et se

Doc Date: 4/19/2021

Appendix E; HMIS Participating Agency List

HMIS Participating Agencies

2-1-1 Help Central

Ampla Health

Blue Cross Partners of CA

Butte/Glenn Community College

Butte County Behavioral Health

Caminar

Chico Housing Action Team (CHAT)

Chico Unified School District

Community Action Agency

Department of Employment and Social Services (DESS)

Health Net

Home & Heart

Housing Authority of Butte County

Jesus Center

Nation's Finest

Northern Circle Indian Housing Authority

Oroville Rescue Mission

Oroville Southside Community Improvement Association

Safe Space Winter Shelter

True North Housing Alliance

Vectors

Veterans Administration

Youth for Change

Appendix F; CES Participating Agency List

CES Participating Agencies

2-1-1 Help Central

Butte/Glenn Community College

Caminar

Chico Housing Action Team (CHAT)

Chico Unified School District

Community Action Agency (CAA)

Department of Employment and Social Services (DESS)

Home & Heart

Jesus Center

Nation's Finest

Northern Circle Indian Housing Authority

Oroville Rescue Mission

Oroville Southside Community Improvement Association (OSCIA)

Safe Space Winter Shelter

True North Housing Alliance

Youth for Change

Appendix G; Quarterly Compliance Checklist

Appendix G: Quarterly Compliance Checklist

| Butte County CoC HMIS |
|--------------------------------|
| Quarterly Compliance |
| Certification Checklist |

| ☐ Quarter 1, due 4/30 | CHO Agency Name: | |
|------------------------|-------------------------|--|
| Quarter 2, due 7/31 | CHO Administrator Name: | |
| ☐ Quarter 3, due 10/31 | Date Completed: | |
| Ouarter 4. due 1/31 | Date Sent: | |

Workstation Security Standards

In partnership with the Butte Countywide Continuum of Care (CoC), Clarity Human Services Software, a division of Bitfocus, Inc., administers the County's Homeless Management Information System (HMIS), a shared database software application which collects, client-level information related to homelessness in the County. Client information is collected in HMIS by Contributory HMIS Organizations (CHO or collectively, CHOs). Information collected is used by the HUD and the CoC to identify national and local patterns and trends in homelessness over time; to conduct needs assessments and prioritize services for certain homeless and low-income subpopulations; to enhance inter-agency coordination; and to monitor and report on the quality of housing and services. This Compliance Certification Checklist is to be completed and certified quarterly by every CHO Administrator according to the schedule outlined below. Each Agency workstation and device used for HMIS data collection, data entry, or reporting must be certified compliant. Any identified compliance issues must be resolved within thirty (30) calendar days. Upon completion, the original signed copy of this checklist should be retained in the records of the HMIS CHO named above for a minimum of seven (7) years. Additionally, a copy should be emailed to the HMIS Lead at HMIShelp@buttecounty.net with the subject line: "Quarterly compliance check for _______ (name of CHO)".

Compliance Certification Schedule:

Quarter 1 (due by April 30th): ALL Active HMIS Users and Workstations Q1 (Jan-Mar)
 Quarter 2 (due by July 31st): ALL Active HMIS Users and Workstations Q2 (Apr-June)
 Quarter 3 (due by October 31st): ALL Active HMIS Users and Workstations Q3 (July-Sep)
 Quarter 4 (due by January 31st): ALL Active HMIS Users and Workstations Q4 (Oct-Dec)

Workstation Security Standards

- 1. A Privacy Notice is visibly posted at each HMIS workstation(or comparable location or device). If multiple HMIS workstations are located in the same room, a single Privacy Notice may be posted if it is easily visible from each HMIS workstation. If the workstation is not in a fixed location Privacy notice is being provided as a handout.
- 2. Each HMIS workstation computer is in a secure location where only Authorized Persons* have access.
- 3. Each HMIS workstation computer is password-protected and locked when not in use. (Changing passwords on a regular basis is recommended)
- 4. Documents printed from HMIS are sent to a printer in a secure location where only Authorized Persons have access.
- 5. Non-authorized persons are unable to view any HMIS workstation computer monitor.
- 6. Each HMIS workstation computer has anti-virus software with current virus definitions, within the past twenty-four (24) hours, and each has had a full system scan within the past week.
- 7. Each HMIS workstation computer has and uses a hardware or software firewall.
- 8. Unencrypted PPI ** has not been electronically stored or transmitted in any fashion (including, without limitation, by hard drive, flash drive, emails, etc.) (Encrypted hard drives are recommended)

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- 9. Hard-copies of PPI (including, without limitation, client files, intake forms, printed reports, etc.) are stored in a physically secure location.
- 10. Each HMIS workstation computer password information, including each Authorized Person's user identification information, is kept electronically and physically secure.
 - a. No passwords for HMIS have been saved on the computer, browser or server.
 - b. No log-in information (e.g. passwords, user names) is written down or have been shared.

CHO Administrator Workstation Checklist

Instructions: For each HMIS workstation at your agency fill in the workstation location or end username. Verify checklist items 1 through 10b on the form below and check (\checkmark) the box to confirm the verification is complete. Fill in additional notes/comments and compliance issues as needed. Attach additional pages if necessary. Return this form to HMIShelp@buttecounty.net

| No. | Workstation Location Or End User Name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 10a | 10b | Notes |
|-----|---------------------------------------|---|---|---|---|---|---|---|---|---|----|-----|-----|-------|
| 1 | | | | | | | | | | | | | | |
| 2 | | | | | | | | | | | | | | |
| 3 | | | | | | | | | | | | | | |
| 4 | | | | | | | | | | | | | | |
| 5 | | | | | | | | | | | | | | |
| 6 | | | | | | | | | | | | | | |

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^{*}An "Authorized Person" means a CHO authorized agent or representative (a HMIS End User or simply an End User) who has completed HMIS training.

^{**}Protected Personal Information (PPI) is defined as client-level identifying information, including, without limitation, information about names, birth dates, gender, race, social security number, phone number, residence address, photographic likeness, employment status, income verification, public assistance payments or allowances, food stamp allotments, or other similar information

| No. | Workstation Location Or End User Name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 10a | 10b | Notes |
|-----|---------------------------------------|---|---|---|---|---|---|---|---|---|----|-----|-----|-------|
| | Of End Oser Name | | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | | |
| 9 | | | | | | | | | | | | | | |
| 10 | | | | | | | | | | | | | | |
| 12 | | | | | | | | | | | | | | |
| 13 | | | | | | | | | | | | | | |

| Workstation Security Compliance Issues Identified | Corrective Action Taken to Resolve Security Compliance Issue |
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| Workstation Security Compliance Issues Identified | Corrective Action Taken to Resolve Security Compliance Issue | |
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| | | |
| NIO A dustinistrator Manufes station Chaplifict | | |
| HO Administrator Works station Checklist | | |
| have verified that, (initial): | | |
| Each End User workstation / device used | to access HMIS has completed the Workstation Security Standard | ds review. |
| All devices used to access HMIS by CHO | End Users were provided and authorized for use by CHO. | |
| Each End User is completing the Butte Co | oC HMIS Informed Consent with clients. | |
| Each End User requires access to HMIS t | o perform their assigned duties. | |
| No unauthorized access to HMIS or conf | idential legally protected client data was divulged to unauthorized | third parties. |
| Incident of unauthorized access or secur | ity breach has been reported to HMIS Lead Agency and impacted | clients have been notified. |
| Date of Incident: | Name of HMIS Lead Agency Staff Member Informed: | |
| | | |
| | | |
| | | |
| CHO Administrator Name (Print) | CHO Administrator Signature | Date |
| | | |
| | | - |
| CHO Agency Director Name (Print) | CHO Agency Director Signature | Date |

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Appendix H; Quarterly Data Quality Checklist

Appendix H: Quarterly Data Quality Checklist Quarter 1, due 4/30 Quarter 2, due 7/31 Quarter 3, due 10/31 Quarter 4, due 1/31 CHO Agency Name: CHO Administrator Name: Checklist Date Completed: Date Sent:

Data Quality Standards

Client information is collected in HMIS by Contributory HMIS Organizations (CHO or collectively, CHOs). Information collected is used by the HUD and the CoC to identify national and local patterns and trends in homelessness over time. A Data Quality Checklist is to be completed for EACH program and certified quarterly by every CHO Administrator according to the schedule outlined below.* Each HMIS End User and program must be certified compliant. Any identified compliance issues must be resolved within thirty (30) calendar days. Upon completion, the original signed copy of this checklist should be retained in the records of the HMIS CHO named above for a minimum of seven (7) years. Additionally, a copy should be emailed to the HMIS Lead at HMIShelp@buttecounty.net with the subject line: "Quarterly Data Quality check for ______ (name of CHO).

Compliance Certification Schedule:

Quarter 1 (due by April 30th): ALL Active HMIS Programs Q1 (Jan-Mar)
 Quarter 2 (due by July 31st): ALL Active HMIS Programs Q2 (Apr-June)
 Quarter 3 (due by October 31st): ALL Active HMIS Programs Q3 (July-Sep)
 Quarter 4 (due by January 31st): ALL Active HMIS Programs Q4 (Oct-Dec)

*Pages 1 and 2 should be completed once per quarter per agency, pages 3 through 6 should be completed per program.

| CHO Data Quality Stats (Monthly Staff Report [DQXX-103]) | |
|--|---|
| CHO Average Data Entry Timeliness (in days) | |
| CHO Refused DQ Score | % |
| CHO Don't Know DQ Score | % |
| CHO Not Collected DQ Score | % |
| CHO Unique Client Count | |

| Inactive Staff with Actively Enrolled Clients (Monthly Staff Report [DQXX-103]) | | | | | | | | | | |
|---|--|--|--|--|--|--|--|--|--|--|
| Name | e # of Unique Clients # of New Clients | | | | | | | | | |
| | | | | | | | | | | |
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| | | | | | e Staff | | | | | |
|------|-----------------------------------|------------------------|--------------------------------|---------------------------|------------------------|------------------------------|------------------------|------------------------------|-------------------------------------|--|
| | (Monthly Staff Report [DQXX-103]) | | | | | | | | | |
| Name | # of Unique Clients | # of New Clients | AVG Timeliness (in days) | Don't Know DQ Score | Refused DQ score | Not Collected DQ Score | Last Log in Date | Annual Assessments Completed | Still needs HMIS Access (Yes/No) | |
| | | | | % | % | % | | | | |
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| Staff Active During the Reporting Period No Longer Requiring Access to HMIS | | | | | | | | | | |
|---|--------------------------------------|---|---|---|--|--|--|--|--|--|
| Full Name | Date No Longer Needed HMIS Access | Date Requested HMIS Lead Deactivate User | Reason Deactivation not requested within 24 hours | Reason End User No Longer Requires Access to HMIS | | | | | | |
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| Butte County CoC |
|--------------------------|
| HMIS Data |
| Quality Checklist |

| CHO Agency Name: | CHO Administrator Name: |
|------------------|-------------------------|
| | |
| Program Name: | |

CHO Administrator Data Quality Checklist

Instructions: For each HMIS Program active during the reporting quarter check (\checkmark) the box to confirm the verification is complete. Fill in additional notes/comments and compliance issues as needed. Attach additional pages if necessary. Return this form to HMIShelp@buttecounty.net

Monthly Staff Report [DQXX-103] User Activity Report [STFF – 101] Duplicate Clients [DQXX – 110] User Active Caseload Report [103] Program Data Review [DQXX – 102] HMIS Data Quality Report [HUD – 225]

| Data Quality Type | Yes | No | N/A | Notes |
|--|-----|----|-----|-------|
| Data entry errors are being corrected on a monthly basis | | | | |
| to ensure the most up- to-date and complete data. | | | | |
| Enrollment/Entry dates, services and exit dates have | | | | |
| been entered into HMIS within 3 business days of | | | | |
| occurrence for ALL members of the household, | | | | |
| including children. | | | | |
| A thorough search for client(s) in the system is done | | | | |
| before using "Add New Client" so as to not duplicate | | | | |
| clients. | | | | |
| Household members have been reviewed and data | | | | |
| corrected in HMIS for all clients. (Household | | | | |
| membership is correct and up to date) | | | | |
| All current clients participating in program have a | | | | |
| current/up to date Informed Consent, with all children | | | | |
| under 18 included on the form. | | | | |
| Contact and Location information are up to date for all | | | | |
| current program clients. Staff confirm contact and | | | | |
| location information with each client on a monthly | | | | |
| basis. | | | | |

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| Data Quality Type | Yes | No | N/A | Notes |
|---|-----|-------|-----------|-------------|
| Missing/unknown data in HMIS is less than 5% per | | | | |
| month for required Universal Data Elements (UDE). | | | | |
| Missing/unknown data in HMIS is less than 5% per | | | | |
| month for required Program Specific Data Elements | | | | |
| (PDE). | | | | |
| Annual Assessments are being completed no more than | | | | |
| 30 days before or after the anniversary of the client's | | | | |
| Project Entry Date, regardless of the date of the most | | | | |
| recent "Status Update." This creates a snapshot that | | | | |
| updates income, non- cash benefits, and health | | | | |
| insurance for clients enrolled in the program for a year | | | | |
| or more. | | | | |
| Status Assessments are completed anytime there is a | | | | |
| change in a client's: 1. Disability 3. Non-Cash Benefits | | | | |
| 2. Income 4. Health Insurance | | | | |
| Clients who meet the HUD definition of homeless are | | | | |
| entered into the Coordinated Entry System | | | | |
| · | | | | |
| There is at least 1 service transaction per month per | | | | |
| client. | | | | |
| Usage of "Data Not Collected," "Client Refused," or | | | | |
| "Client Doesn't Know" is infrequent and rare. (<= 5%) | | | | |
| | | Emerg | gency She | elters Only |
| A "Homeless Verification Form" has been completed for | | | | |
| each client and is saved in their program: | | | | |
| 1. Night-by-Night, client allowed in during the day - | | | | |
| one per enrollment. | | | | |
| 2. Night-by-Night, client must leave during the day - | | | | |
| one per night. | | | | |
| 3. <u>Entry/Exit</u> - one per enrollment. | | ĺ | | |
| Night-by-Night -A bed night was tracked for each client | | 1 | | |
| the night prior to their exit from the shelter. | | | | |
| A "Current Living Cituation Assessment" has been | | | | |
| A "Current Living Situation Assessment" has been completed the same date as <i>Project Entry Date</i> | | | | |
| completed the same date as Floject Littly Date | | | | |

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| Outreach Programs Only | | | | | | | | |
|---|-----------|------------|-----------|---|--|--|--|--|
| Data Quality Type | Yes | No | N/A | Notes | | | | |
| A "Current Living Situation Assessment" has been completed the same date as <i>Project Entry Date</i> . | | | | | | | | |
| A "Current Living Situation Assessment" is being completed at every client contact. | | | | | | | | |
| Data Quality Issues Identified Corrective Action Taken to Resolve Data Quality Issue | | | | | | | | |
| Data Quality issues identified | | | | Corrective Action Tuken to Resolve Duta Quality issue | | | | |
| | | | | | | | | |
| | | | | | | | | |
| HO Administrator Data Quality Checklist | | | | | | | | |
| have verified that, (initial): | | | | | | | | |
| Each End User accessing HMIS has read a the | e HMIS I | Manual | | | | | | |
| Each End User understands the Data Entry re | equirem | ents of | their pr | ogram and is in compliance. | | | | |
| | | | | | | | | |
| CHO Administrator Name (Print) CHO |) Adminis | trator Sig | gnature | Date | | | | |
| CHO Agency Director Name (Print) | Agency | Director | Signature | Date | | | | |

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Continuum of Care All Member Meeting Virtual Meeting November 13, 2023 1:00 p.m. – 3:00 p.m.

CoC Agenda Item #8:

2024 CoC Meeting Calendar



Butte Countywide Homeless Continuum of Care

2024 Council Meeting Schedule

| Proposed Date | Conflicts | Changes/Notes | Location | <u>Time</u> |
|----------------------|------------------|-------------------------------|-----------------|------------------|
| January 22, 2024 | Holiday | Change from January 15 | Virtual | 1:00pm to 3:00pm |
| February 12, 2024 | Holiday | Change from February 19 | Virtual | 1:00pm to 3:00pm |
| March 18, 2024 | None | | Virtual | 1:00pm to 3:00pm |
| April 15, 2024 | None | | Virtual | 1:00pm to 3:00pm |
| May 20, 2024 | None | All Member Meeting | Virtual | 1:00pm to 3:00pm |
| June 17, 2024 | None | | Virtual | 1:00pm to 3:00pm |
| July 15, 2024 | None | Flexibility to Cancel Meeting | Virtual | 1:00pm to 3:00pm |
| August 19, 2024 | None | | Virtual | 1:00pm to 3:00pm |
| September 16, 2024 | None | | Virtual | 1:00pm to 3:00pm |
| October 21, 2024 | None | | Virtual | 1:00pm to 3:00pm |
| November 18, 2024 | None | All Member Meeting | Virtual | 1:00pm to 3:00pm |
| December 16, 2024 | None | | Virtual | 1:00pm to 3:00pm |

Location: Virtual

Hosted by Butte County Department of Employment and Social Services (DESS). Invite sent monthly.