
*Monterey and San Benito Counties’
Homeless Management Information System (HMIS)*

Governance Policies & Procedures

THE COALITION
OF HOMELESS SERVICES PROVIDERS

Monterey and San Benito Counties’ HMIS Project
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CONTENTS

1. Introduction	4
2. Project Overview	4
3. Governing Principles	5
Confidentiality	5
Data Integrity	5
System Availability	6
Compliance	6
4. Roles and Responsibilities	6
Monterey and San Benito Counties' HMIS Planning and Oversight Committee	6
Coalition of Homeless Services Providers (CHSP)	6
WellSky	7
Partner Agency	7
Conflict Resolution Process for HMIS	8
5. Operating Procedures	9
5.1 Project Participation	9
Confirm Participation	9
Terminate Participation	9
Assign Agency HMIS Security and Technical Administrators	10
Re-Assign Agency HMIS Administrator	10
Site Security Assessment	10
Annual Security Audits	11
5.2 User Authorization and Passwords	11
Workstation Security Assessment	12
Request New User ID	12
User Access after Termination of Employment	13
Compliance Failure	13
User Clean-up	13
Reset Password	13
5.3. Collection and Entry of Client Data	13
5.4. Release and Disclosure of Client Data Policies	14
5.5. Workstation Security	15
5.6. Training	15
Start-up Training	16
Agency HMIS Administrator Training	16
On-going Training	16

5.7. Compliance.....	16
5.8. Technical Support.....	17
5.9. Changes to this and other Documents	17
Changes to Governance Policies & Procedures	18
6. Other Obligations and Agreements	18
7. Forms Control.....	18

1. INTRODUCTION

This document provides the framework for the ongoing operations of the *Monterey and San Benito Counties' Homeless Management Information System (Monterey/San Benito Counties' HMIS) Project*. The Project Overview provides the main objectives, direction and benefits of the Monterey/San Benito Counties' HMIS Project. Governing principles establish the values that are the basis for all policy statements and subsequent decisions.

Operating procedures will provide specific policies and steps necessary to control the operational environment and enforce compliance in the areas of:

- ✓ Project Participation
- ✓ User Authorization
- ✓ Collection of Client Data
- ✓ Release of Client Data
- ✓ Server Security and Availability
- ✓ Workstation Security
- ✓ Training
- ✓ Technical Support

Other obligations and agreements will discuss external relationships required for the continuation of this project. Forms control provides information on obtaining forms, filing and record keeping.

2. PROJECT OVERVIEW

The long-term vision of HMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities. Accurate information will put the collaborative in a better position to request funding from various sources and help better plan for future needs. The purpose of the Monterey and San Benito Counties' HMIS is to be an integrated network of homeless and other services providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet federal requirements, but also enhance service planning and delivery. The fundamental goal of the *Monterey/San Benito Counties' HMIS Project* is to document the demographics of homelessness in Monterey and San Benito Counties according to the HUD HMIS standards. It is then the goal of the project to identify patterns in the utilization of assistance, and document the effectiveness of the services for the client. This will be accomplished through analysis of data that is gathered from actual experiences of homeless persons, the service providers who assist them in shelters, and other homeless assistance programs throughout the counties. Data that is gathered via intake interviews and program participation will be used to complete HUD annual progress reports. This data may also be analyzed to provide unduplicated counts and anonymous data to policy makers, service providers, advocates, and consumer representatives.

The project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the two counties. Access to the central server is limited to agencies formally participating in the project including only authorized staff members that have met the necessary training and security requirements.

The *Monterey/San Benito Counties' HMIS Project* is staffed and advised by the Coalition of Homeless Services Providers (CHSP). CHSP's Executive Officer is the authorizing agent for all agreements made between Partner Agencies and CHSP. CHSP staff is responsible for coordination, training and user access. CHSP staff will also provide for technical assistance to users of the system throughout the two counties.

The Monterey/San Benito Counties' HMIS Planning and Oversight Committee, comprised of representatives from Partner Agencies and CHSP, is responsible for oversight and guidance of the *Monterey/San Benito Counties' HMIS Project*. This group is committed to balancing the interests and needs of all stakeholders involved: homeless men, women, and children; service providers; and policy makers.

Potential benefits for homeless men, women, children and case managers:

Service coordination can be improved when information is shared, with written client consent, among case management staff within one agency or with staff in other agencies who are serving the same clients.

Potential benefits for agencies and program managers:

Aggregated information can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funding agencies, such as HUD. Aggregated information can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funding agencies, such as HUD.

Potential benefits for the community-wide Continuum of Care (CoC) and policy makers:

County-wide involvement in the project provides the capacity to generate HUD annual progress reports for the Continuum of Care (CoC) and allows access to aggregate information, both at the local and regional level, that will assist in identification of gaps in services. In addition, it will assist the completion of other service reports used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

3. GOVERNING PRINCIPLES

Described below are the overall governing principles upon which all decisions pertaining to the *Monterey/San Benito Counties' HMIS Project* are based:

Participants are expected to read, understand, and adhere to the spirit of these governing principles, even when the *Governance Policies and Procedures* do not provide specific direction.

Confidentiality

The rights and privileges of clients are crucial to the success of HMIS. These policies will ensure clients' privacy without impacting the delivery of services. This is the primary focus of agency programs participating in this project. Policies regarding client data will be founded on the premise that a client owns his/her own personal information and will provide the necessary safeguards to protect client, agency, and policy level interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

Data Integrity

Client data is the most valuable and sensitive asset of the *Monterey/San Benito Counties' HMIS Project*. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

System Availability

The availability of a centralized data repository is necessary to achieve the ultimate CoC-wide aggregation of unduplicated homeless statistics. CHSP staff is responsible for ensuring the broadest deployment and availability for homeless service agencies in Monterey and San Benito Counties.

Compliance

Violation of the *Governance Policies and Procedures* set forth in this document will have serious consequences. 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 entity.

4. ROLES AND RESPONSIBILITIES

Monterey and San Benito Counties' HMIS Planning and Oversight Committee

- Project direction and guidance
- Technology plan
- Selection of system software
- Approval of project forms and documentation
- Project participation and feedback
- Project Funding

Coalition of Homeless Services Providers (CHSP)

CHSP Executive Officer

- Liaison with Department of Housing and Urban Development (HUD) and other state/federal partners.
- Project staffing
- CHSP signatory for Memoranda of Understandings
- Overall responsibility for success of the *Monterey/San Benito Counties' HMIS Project*
- Policies & Procedures compliance
- General responsibility for project rollout

CHSP Staff – assigned HMIS duties (as applicable)

- End user licenses
- Creation of project forms and documentation
- Keeper of signed Memorandums of Understanding
- User administration
 - Add and remove Partner Agency HMIS Administrators
 - Manage user licenses
- Training Coordination for:
 - Curriculum development
 - Training documentation
 - Confidentiality training
 - Application training for HMIS Administrators and end users
 - Outreach/End user support
 - Training timetable
 - End User Trainings
 - Helpdesk
 - Security Training
- Adherence to HUD data standards

- HMIS Lead Security Administrator
- Application customization
- Data monitoring
- Data validity
- Aggregate data reporting and extraction
- Assist Partner Agencies with agency-specific data collection and reporting needs (within reason and within constraints of other duties).
- Data for annual US Dept. of HUD Continuum of Care Application Narrative
- Data collection and coordination of annual HUD Housing Inventory Count and sheltered Point in Time Count
- Liaison with WellSky
- Sign and manage the contractual agreement with WellSky
- Manage the implementation and on-going usage of the HMIS system on behalf of the entire region
- Escalate problems to the application software vendor and hosting service provider, when necessary

WellSky

- Setup, operations, and on-going maintenance of the HMIS system.
- Work with CHSP to plan and implement the system
- Ensure CHSP receive appropriate training as required for implementation and ongoing outreach and support.
- Provide technical assistance to the Continuum of Care HMIS Administration teams. Facilitate problem resolution in the event continuums are experiencing difficulties with the software and/or system. Resolve issues which local Continuum of Care HMIS Administration could not adequately resolve.
- Perform application administration tasks as necessary for the setup and ongoing operations of the system
- Centrally manage the system-wide configuration on behalf of the multiple Continuums of Care, including:
 - Initial application setup and the first level, cross continuum structure within the system.
 - Configuration of standard pick lists provided with the product.
 - Configuration of standard client assessments provided with the product.
 - Procure, allocate and administer user license allocation across the various continuums within the system.
 - In coordination with local Continuum of Care HMIS Administration, create and manage agency-specific application configurations, on behalf of individual agencies within the system and including client assessment forms, data fields and/or pick lists.
 - In coordination with local Continuum of Care HMIS Administration, advise on the creation and management of all custom data importation and exportation routines necessary to integrate external data into the HMIS system, and export internal data from within the HMIS system, as required on behalf of individual agencies, Continuums of Care, or other outside policy makers and funders; such as the potential inclusion of HMIS data in a broader regional data warehouse. Audit usage of the application in order to ensure that appropriate standard *Governance Policies and Procedures* are agreed upon, in place and followed.
 - Monitor system usage over time in order to ensure that appropriate capacity planning is in place to proactively plan for future system growth and expansion.
- Follow all established *Monterey and San Benito Counties' HMIS Project* procedures especially, procedures related to the maintenance of confidentiality.

Partner Agency

Partner Agency Executive Director

- Authorizing agent for partner agreement (MOU)
- Designation of HMIS Security Administrator and Technical Administrator
 - Perform background checks on anyone designated as an HMIS Administrator
- Ensuring agency compliance with *Governance Policies & Procedures*
- End user license management
- Agency level HUD reporting, if applicable
- Create and follow Agency *Client Grievance Policy/Procedure*, as it relates to HMIS

Partner Agency Technical Administrator

- Overseeing agency compliance with the Memorandum of Understanding and all applicable plans, forms, standards and governance documents,
- Detecting and responding to violations of any applicable HMIS plans, forms, standards and governance documents,
- Serving as the primary contact for all communication regarding the HMIS at this agency and forwarding information to all agency End Users as appropriate,
- Ensuring thorough and accurate data collection by agency End Users as specified by HMIS forms and standards,
- Providing first-level End User support,
- Managing End User licenses,
- Ensuring the agency provides and maintains adequate internet connectivity,
- Maintaining agency and program descriptor data in HMIS,
- Configuring provider preferences (assessments, referrals, services, etc.) in HMIS,
- Completing agency-level HUD reporting and/or supporting agency programs with reporting needs, if applicable,
- Ensuring all users adhere to trainings provided by CHSP, and
- Performing authorized imports of client data.

Partner Agency Security Officer

- Conducting a thorough bi-annual review of internal compliance with all applicable HMIS plans, standards and governance documents,
- Completing the Compliance Certification Checklist and forwarding the Checklist to CHSP,
- Continually monitoring and maintaining security of all staff workstations used for HMIS data entry,
- Safeguarding client privacy by ensuring End User and agency compliance with confidentiality and security policies,
- Investigating potential breaches of HMIS system security and/or client confidentiality and notifying CHSP of substantiated incidents,
- Developing and implementing procedures for managing new, retired, and compromised local system account credentials,
- Developing and implementing procedures that will prevent unauthorized users from connecting to private agency networks,
- Ensuring all agency End Users complete the HMIS End User Agreement and maintaining documentation of all HMIS End User Agreements,
- Ensuring all agency End Users complete mandatory training and forwarding documentation of training to the HMIS Lead Agency.

Partner Agency Staff

- Safeguard client privacy through compliance with confidentiality policies
- Data collection as specified by CHSP training, workflow charts, and other documentation

Conflict Resolution Process for HMIS

Conflicts, grievances, etc. should be handled at the lowest level possible at every level of the Monterey/San Benito Counties' HMIS. Reasonable efforts should be made and documented if possible and appropriate, to obtain satisfaction by other means, including escalation within an agency and through CHSP.

Client level conflicts will be handled within the Partner Agency using its agency *Client Grievance Policy/Procedure*.

- All Partner Agencies will have a *Client Grievance Policy/Procedure*.
- Partner Agency *Client Grievance Policy/Procedures* are reviewed as they relate to the Monterey/San Benito Counties' HMIS by the HMIS Planning and Oversight Committee and CHSP Executive Officer, for feedback and comments.

Changes to a Partner Agency *Client Grievance Policy/Procedure* will be submitted to the CHSP Executive Officer and HMIS Planning and Oversight Committee in writing within 30 days of the changes for feedback and comments.

Agency level conflicts will be handled through an escalating peer review process:

- The CHSP Executive Officer, and/or CHSP staff, and Partner Agency Executive Director, and/or HMIS Agency Administrator will make every attempt to resolve conflicts as they occur. CHSP and/or the Partner Agency may annotate their concerns in writing, as appropriate.
- Unresolved conflicts between the CHSP and a Partner Agency will be noted in writing and forwarded to the CHSP Executive Committee. In the event of an impasse, other members of the board will be notified within 10 working days of the impasse declaration. Either party may declare an impasse.
- The CHSP Executive Committee will review the written grievance at the next scheduled Executive Committee meeting. The Executive Committee will make every attempt to resolve the matter within **30 days** of reviewing the grievance. Resolution of the conflict will be in writing and signed by all relevant parties.
- Unresolved conflicts will be forwarded to the full CHSP Board of Directors for further guidance and action.
- Any recommendation regarding termination of a Partner Agency from the Monterey/San Benito Counties' HMIS will be forwarded to the full CHSP Board of Directors for consideration and possible action.
- All decisions of the CHSP Board of Directors are final.
- Conflicts between or among Partner Agencies may require mediation by the CHSP Executive Officer and/or CHSP staff. Resolution of the conflict may be annotated in writing and signed by all relevant parties as appropriate.

Unresolved conflicts between or among Partner Agencies will be noted in writing and forwarded to the CHSP Executive Committee within 10 working days of the date of an impasse. Any party may declare an impasse. The Executive Committee will then follow the same process noted above.

5. OPERATING PROCEDURES

5.1 Project Participation

POLICIES

- Agencies participating in the *Monterey/San Benito Counties' HMIS Project* shall commit to abide by the governing principles of the *Monterey/San Benito Counties' HMIS Project* and adhere to the terms and conditions of this partnership as detailed in the memorandum of understanding.

PROCEDURES

Confirm Participation

- The Partner Agency shall confirm their participation in the *Monterey/San Benito Counties' HMIS Project* by submitting a Memorandum of Understanding (MOU) to the CHSP Executive Officer.
- The CHSP Executive Officer will co-sign the MOU.
- The CHSP Executive Officer will maintain a file of all signed Memorandums of Understanding.
- The CHSP staff will update the list of all Partner Agencies and make it available to the project community.

Terminate Participation

Voluntary

1. The Partner Agency shall inform the CHSP Executive Officer in writing of their intention to terminate their agreement to participate in *Monterey/San Benito Counties' HMIS Project*.
2. The CHSP Executive Officer will inform relevant CHSP staff who will update the Participating Agency List.
3. The CHSP Executive Officer will revoke access of the Partner Agency staff to the Monterey/San Benito Counties' HMIS.
4. The CHSP Executive Officer will keep all termination records on file with the associated Memorandums of Understanding.

Lack of Compliance

1. When the CHSP Executive Officer determines that a Partner Agency is in violation of the terms of the partnership, Executive Directors of Partner Agency and CHSP will strive to resolve the compliance issue(s) within **30 days** of the conflict(s).
2. If Executive Directors are unable to resolve the compliance issue(s) within 30 days, the Peer Review Process will be employed to resolve the conflict. If that results in a ruling of termination:
 - The Partner Agency will be notified in writing of the intention to terminate their participation in the *Monterey/San Benito Counties' HMIS Project*
 - The CHSP Executive Officer will revoke access of the Partner Agency staff to the Monterey / San Benito Counties' HMIS
 - The CHSP Executive Officer will keep all termination records on file with the associated memorandums of understanding

Notes:

- All Partner Agency specific information contained in the HMIS system will remain in the HMIS system.
- If HMIS participation is mandated by the agency's funder, CHSP Executive Officer will remind agency, either via email or mail, that terminating their participation will result in notification to the funder.

Assign Agency HMIS Security and Technical Administrators

1. The Partner Agency shall designate, in writing, an Agency HMIS Administrator for communications regarding Monterey/San Benito Counties' HMIS and submit this documentation to the CHSP Executive Officer.
2. The CHSP staff will obtain all signatures necessary to execute the *Partner Agency HMIS Administrator Agreement*.
3. The CHSP staff will maintain a file of all submitted documentation.
4. The CHSP staff will maintain a list of all assigned Agency HMIS Administrators and make it available to the CHSP project staff.

Re-Assign Agency HMIS Administrator

1. The Partner Agency may designate new or replacement Agency HMIS Administrators in the same manner as above.

Site Security Assessment

1. Prior to allowing access to the HMIS, the Partner Agency HMIS Administrator and CHSP staff will meet to review and assess the security measures in place to protect client data. This meeting may include, but is not limited to, the Partner Agency Executive Director (or designee), Program Manager / Administrator and the either of the Agency HMIS Administrators with CHSP staff to assess agency information security protocols. This review shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the agency, its Executive Director, and the Agency HMIS Administrators.

2. Agencies shall have virus protection software on all computers that access HMIS.
3. The Partner Agency Security Officer will use the Compliance Certification Checklist to conduct bi-annual security audits of all Partner Agency HMIS End User workstations.
4. The Partner Agency Security Officer 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 Partner Agency Security Officer's regular audits.
5. If areas are identified that require action due to noncompliance with these standards or any element of the Monterey and San Benito Counties HMIS Policies and Procedures, the Partner Agency Security Officer will note these on the Compliance Certification Checklist, and the Partner Agency Security Officer and/or HMIS Technical Administrator will work to resolve the action item(s) **within one month**.
6. Any Compliance Certification Checklist that includes 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 Partner Agency Executive Director or other empowered officer prior to being forwarded to CHSP staff.

Annual Security Audits

1. The CHSP staff will schedule the annual security audit in advance with the Partner Agency Security Officer.
2. The CHSP staff will use the Compliance Certification Checklist to conduct security audits.
3. The CHSP staff must randomly audit at least 10% of the workstations for each HMIS Partner Agency. In the event that an agency has more than 1 program site, at least 1 workstation per program site must be audited.
4. Each compliance check for each computer should be noted in the compliance Checklist.
5. If areas are identified that require action due to noncompliance with these standards or any element of the Monterey and San Benito Counties HMIS Policies and Procedures, CHSP staff will note these on the Compliance Certification Checklist, and the Partner Agency Security Officer and/or Technical Administrator will work to resolve the action item(s) within one month.
6. Any Compliance Certification Checklist that includes 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 Partner Agency Executive Director or other empowered officer and forwarded to CHSP staff.

5.2 User Authorization and Passwords

POLICIES

- Agency Staff participating in the *Monterey/San Benito Counties' HMIS Project* shall commit to abide by the governing principles of the Monterey/San Benito Counties' HMIS Project and adhere to the terms and conditions of the *Partner Agency User Agreement*.
- The Partner Agency HMIS Administrator must only request user access to HMIS for those staff members that require access to perform their job duties.
- All users must have their own unique user ID and should never use or allow use of a user ID that is not assigned to them. [*See Partner Agency User Agreement*]
- Temporary passwords will be communicated via email to the owner of the User ID.
- User specified passwords should never be shared and should never be communicated in any format.
- New User IDs must require password change on first use.
- Passwords must consist of 8 to 16 characters and must contain a combination of letters and numbers (no special characters, alpha and numeric only). The password must contain at least two numbers. [Required by software.] According to the HUD Data Specification Draft:

User authentication. HMIS workstations and server shall be secured with, at a minimum, a user authentication system consisting of a username and a password. Passwords shall be at least eight characters long and meet industry standard complexity requirements, including, but not limited to, the use of at least one of each of the following kinds of characters in the passwords: Upper and lower-case letters, and numbers and symbols. Passwords shall not be, or include, the username, the HMIS name, or the HMIS vendor's name. In addition, passwords should not consist entirely of any word found in the common dictionary or any of the above spelled backwards. The use of default passwords on initial entry into the HMIS application is allowed so long as the application requires that the default password be changed on first use. Written information specifically pertaining to user access (e.g., username and password) shall not be stored or displayed in any publicly accessible location.

- Passwords must be changed every 45 calendar days. If they are not changed within that time period, they will expire and the user will be locked out of the system.
- For Agency Users (not including Partner Agency HMIS Administrator), passwords can be reset by clicking the “Forgot Password” link on the ServicePoint (HMIS) login screen.
- Three consecutive unsuccessful attempts to login will disable the User ID until the account is reactivated by an administrator.
- Personal devices are not permitted to access HMIS.
- A public key infrastructure (PKI) supports the distribution and identification of public encryption keys, enabling users and computers to both securely exchange data over networks such as the Internet and verify the identity of the other party.
- Users who have not attended HMIS New User training in more than one year have to go through training again before activating their license when transitioning to a new agency.
- End user licenses must be activated within 90 days of training. Users who do not have their licenses activated within said timeframe will have to re-attend New User training.
- New users must participate in annual security trainings. Users who do not renew will be locked out until completed.

PROCEDURES

Workstation Security Assessment

1. Prior to requesting user access for any staff member, the Partner Agency HMIS Administrator will assess the operational security of the user's workspace.
2. Partner Agency HMIS Administrator will ensure that all agency users realize they can access HMIS only through secure workstations and are prohibited from using public and personal workstations (libraries, cafes, etc).
3. Partner Agency HMIS Administrator will confirm that workstation has virus protection software installed and that a full-system scan has been performed on a weekly basis.
4. PKIs are distributed annually, via email. Agency Administrators will retrieve the PKI password from CHSP by opening a case and will assist their end users with installing the new PKI on their workstations.

Request New User ID

When a Partner Agency identifies a staff member that requires access to the Monterey/San Benito Counties' HMIS Project, the Partner Agency HMIS Administrator, or Executive Director must:

1. Have the new user watch the “New User Training Presentation” found at <http://www.chspmontereycounty.org/hmis-training-documents/>
2. Submit an HMIS License Request form and submit payment, if applicable.
3. Visit the CHSP Training Site at <http://www.chspmontereycounty.org/hmis-trainings/> to:
 - a. Complete the Confidentiality Video, Survey and End User Agreement.
 - b. Register for New User training
4. New Users will receive their logins and temporary passwords after new user training and all above steps are completed.

User Access after Termination of Employment

After a user exits employment from an agency, the Agency Admin (Technical) or Executive Director must:

1. Reset the user's password to prevent the user from accessing HMIS.
2. Request deletion of the user's account in HMIS within 7 days of termination by opening a case.

Compliance Failure

If a user breaches the User Agreement, violates the Governance Policies & Procedures, or breaches confidentiality or security, the Agency Administrators (Technical or Security) must:

1. Inform CHSP immediately of the breach, in writing, disclosing the nature of the breach, the user(s) involved, and any clients who may be affected
2. Change the password of the user(s) involved
3. Open a case to have the user de-activated in HMIS

User Clean-up

1. CHSP will monitor user access to HMIS. Users identified as not having logged in within 90 days will be forwarded to agency admins.
2. The Agency Admin will have 10 working days to report back to CHSP staff regarding the logins in question.
3. Any inactive users who have not been accounted for will be removed permanently from HMIS.

Reset Password

1. When a User forgets their password or has reason to believe that someone else has gained access to their password, they must immediately notify either of their Partner Agency HMIS Administrators and reset their passwords.

5.3. Collection and Entry of Client Data

POLICIES

- Client data will be gathered according to the policies, procedures and confidentiality rules of each individual program.
- Client data may only be entered into the HMIS with client's authorization to do so.
- Client data will only be shared with Partner Agencies if the client consents by signing the client consent form, and that form is filed on record.
- Client data will be entered into the HMIS in a timely manner.
 - Client identification should be completed during the intake process or as soon as possible following intake and within **72 hours or three business days**.
 - Service records should be entered on the day services began or as soon as possible within the next **72 hours or three business days**.
 - Required assessments should be entered as soon as possible following the intake process and within **72 hours or three business days**.
- All client data entered into the HMIS will be kept as accurate and as current as possible.
- Hardcopy and electronic files will continue to be maintained according to individual program requirements in accordance with the HUD Data Standards.
- No data may be imported without the client's authorization.
- Any authorized data imports will be the responsibility of the participating agency.
- Partner Agencies are responsible for the accuracy, integrity, and security of all data input by said Agency.
- Partner agencies must adhere to workflows provided by CHSP. Changes to workflows must be submitted in writing to the CHSP and will be brought to the Oversight Committee for final approval.
- Victim Service Providers (VSP) are prohibited from entering data into HMIS. Non-VSP agencies must offer clients fleeing domestic violence the opportunity to have their information that is entered into HMIS locked

down. If the client's profile already exists, the new program entry should be locked down. If the client is new to HMIS, the entire profile should be locked down.

- Agencies that lockdown any clients must report the client ID to CHSP via web form so that CHSP can manage all locked client data.

PROCEDURES

- Refer to User Manual and/or Training Materials for specific data entry guidelines.

5.4. Release and Disclosure of Client Data Policies

POLICIES

- Client-specific data from the HMIS system may be shared with partner agencies only when the sharing agency has secured a valid Release of Information Form (ROI) from that client authorizing such sharing, and only during such time that release of information 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.
- 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. Please see release of information.
- Services may **NOT** be denied based on the client's refusal to sign the form or declines to state any information.
- Release of information must constitute **INFORMED** consent. The burden rests with the intake counselor to inform the client before asking for consent. As part of informed consent, the relevant portions of these *Governance Policies and Procedures*, as well as privacy language found in the final HUD Data Standards, should be posted near the intake location and/or be available at the intake location, along with Agency's relevant *Governance Policies & Procedures* and a list of agencies participating in *Monterey/San Benito Counties' HMIS Project*.
- All approved notices are found on the CHSP website.
- Client shall be given print out of all HMIS data relating to them upon written request and within 10 working days from the time the written request is received. Written requests will be date/time stamped immediately upon receipt.
- A report of data sharing events, including dates, agencies, persons, and other details, must be made available to the client upon request within 10 working days from the time the written request is received. Written requests will be date/time stamped immediately upon receipt.
- A log of all external releases or disclosures must be maintained for seven years and made available to the client upon written request within 10 working days from the time the written request is received. Written requests will be date/time stamped immediately upon receipt.
- Aggregate data that does not contain any client specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients as part of the informed consent procedure.
- Each Agency Executive Director is responsible for their agency's internal compliance with the HUD Data Standards.
- ROI's expire after three (3) years, unless Partner Agencies' have internal policies that conflict with that timeline.

PROCEDURES

Types of consent are as follows:

- A. Consent to the entry of basic and relevant information into the Homeless Management Information System (HMIS), during the time frame in which the ROI is active, and shared between partner agencies.
 - a. The ROI permits visibility of the client’s activity during which the ROI is active. After the ROI expires the client’s information will still be visible. Information entered into HMIS after the ROI expires is against policy.
- B. Consent to entry of basic and relevant information into HMIS, during the time frame in which the ROI is active, but not shared between Partner Agencies.
 - a. If the client already exists in HMIS, only the specific program Entry will be locked down to all users outside of the receiving agency.
 - b. If the client did not already exist in HMIS, the entire client profile will be locked down to all users outside of the receiving agency.
- C. Completely refuse to sign the ROI. (In this case, the agency has the following options)
 - i. Ask the client to provide their own alias and enter the client’s information into HMIS (with the exception of their social security number and birthday.) The agency should keep record of the client’s alias in the client’s folder. Many clients have street names and may choose to use that name. *This is the most desirable option as the client is likely to remember this alias and use it at other agencies, reducing the possibility of double entry.*
 - ii. The agency may their own unique name (or alias) and enter the client’s information into HMIS (with the exception of their social security number and birthday.) The agency should keep record of the client’s alias in the client’s folder.
 - iii. Opt out on entering the client’s information into HMIS completely, while remembering to manually include the client in all reporting (HIC/PIT, ESG, PATH, etc.)

5.5. Workstation Security

POLICIES

- Partner Agency HMIS Administrator is responsible for taking the necessary actions for preventing the degradation of the whole system resulting from viruses, intrusion, or other factors under the agency’s control.
- Partner Agency HMIS Administrator is responsible for preventing inadvertent release of confidential client-specific information. Such release may come from physical, electronic or even visual access to the workstation, thus steps should be taken to prevent these modes of inappropriate access (i.e. don’t let someone read over your shoulder; lock your screen).
- Recommended Internet Connection: At minimum, DSL
- Recommended Browser: Latest release of Internet Explorer, Chrome, Firefox or Opera
- Definition and communication of all procedures to all agency users for achieving proper agency workstation configuration and for protecting their access by all agency users to the wider system are the responsibility of the Partner Agency HMIS Administrator.
- Workstations should be password protected and locked when not in use

PROCEDURES

- At a minimum, any workstation accessing the HMIS shall have anti-virus software with current virus definitions (24 hours) and frequent full-system scans (weekly).

5.6. Training

POLICIES

- Agency Executive Director shall obtain the commitment of Agency HMIS Administrator and designated staff persons to attend training(s) as specified in the *Memorandum of Understanding* (MOU) between Partner Agency and CHSP.
- Changes to the Data Standards requires a mandatory user training. Users who do not attend will be temporarily locked out of HMIS until trained.

PROCEDURES

Start-up Training

CHSP will provide or coordinate training in the following areas prior to Partner Agency using the Monterey/San Benito Counties' HMIS:

- Partner Agency HMIS Administrator Training
- New User Training

Agency HMIS Administrator Training

Training will be done in a group setting, where possible, to achieve the most efficient use of time and sharing of information between agencies. Training will include:

- HMIS Policies and Procedures
- New user set-up procedures
- End user training
- Running package reports
- Client Rights
- Technical and Security Administrator Duties
- Password Resets
- Data Quality

On-going Training

CHSP will provide regular training for HMIS End Users on a monthly basis. The areas covered will be:

- Confidentiality
- Data Quality
- Workflows
- Data Standards changes
- System upgrades

Additional training classes may be scheduled, as needed, under the guidance of the CHSP and HMIS Planning and Oversight Committee.

5.7. Compliance

POLICIES

- Compliance with these *Governance Policies and Procedures* is mandatory for participation in the Monterey/San Benito Counties' HMIS system.
- Using the ServicePoint software, all changes to client data are recorded and will be periodically and randomly audited for compliance by CHSP staff and CTA.

PROCEDURES

- See Project Participation and User Authorization sections for procedures to be taken for lack of compliance.

5.8. Technical Support

POLICIES

- Support requests include problem reporting, requests for enhancements (features), or other general technical support.
- Users shall submit support requests to their Partner Agency HMIS Administrator or file a case.
- Users shall not, under any circumstances, submit requests to WellSky.
- Users shall not submit requests directly to CHSP via email or telephone.
- CHSP will only provide support for issues specific to the *Monterey/San Benito Counties' HMIS Project* software and systems.

PROCEDURES

1. User attempts to resolve issue with their Agency Admin.
2. If issue cannot be resolved with Admin, user to open a case.
 - a. User must complete all fields of the case form to ensure timely response and include examples of clients who are affected by the issue, if applicable.
3. CHSP to accept/acknowledge receipt of the case **within two business days.**
4. If CHSP is:
 - a. able to resolve the case, case will be resolved within the following timeline, based on levels of difficulty and time consumption:
 - i. Low level cases- (*i.e. Password changes, PKI requests, etc.*) 1 business day
 - ii. Medium level cases- (*i.e. deactivating programs, data quality assistance, etc.*) 1-5 business days.
 - iii. High level cases- tbd
 - b. unable to resolve the issue, case will be escalated to WellSky **within two business days** of accepting the case.

Note: If the Support Request is deemed by the CHSP Executive Officer to be an agency-specific customization, (Agency-specific customizations include but are not limited to new assessments, new data fields, and new picklists), resolution of the request may be prioritized accordingly. CHSP reserves the right to charge on an hourly basis for these changes if/when the workload for such agency-specific customizations becomes burdensome.

- i. Medium level cases- (*i.e. data quality assistance, etc.*) 1-5 business days.
- ii. High level cases- tbd

5.9. Changes to this and other Documents

POLICIES

- The Monterey and San Benito Counties' HMIS Planning and Oversight Committee will guide the recommendations regarding compilation and amendment of these *Governance Policies and Procedures*.

- The *Governance Policies and Procedures* must be reviewed updated every one year.
- Interim changes will be pre-approved by the Monterey and San Benito Counties' HMIS Planning and Oversight Committee and will be added as an addendum until the next updating cycle of this document.
- Implementation of any updated *Governance Policies and Procedures* should be followed by a new executed MOU.

PROCEDURES

Changes to Governance Policies & Procedures

1. Proposed changes may originate from any participant in the *Monterey/San Benito Counties' HMIS Project*.
2. When proposed changes originate within a Partner Agency, they must be reviewed by the Partner Agency Executive Director, and then submitted by the Partner Agency Executive Director to the CHSP Executive Director for review and discussion.
3. CHSP staff will maintain a list of proposed changes.
4. The list of proposed changes will be discussed by the HMIS Planning and Oversight Committee, subject to line item excision and modification. This discussion may occur either at a meeting of the group, or via email or conference call, according to the discretion and direction of the group.
5. Results of said discussion will be communicated, along with the recommended amendment to the *Governance Policies and Procedures*.
6. Partner Agencies' Executive Directors shall acknowledge receipt and acceptance of the revised *Governance Policies and Procedures* within 10 working days of delivery of the amended *Governance Policies and Procedures* by signing and returning this document to the CHSP Executive Officer.
7. Partner Agency Executive Director shall also ensure circulation of the revised document within their agency and compliance with the revised *Governance Policies and Procedures*.

6. OTHER OBLIGATIONS AND AGREEMENTS

The previous U.S. Department of HUD grant for the *Monterey/San Benito Counties' HMIS Project* was forfeited to save a program providing services in CA-506, as approved by the CHSP Board of Directors in 2014. CHSP negotiated interim funding from the Monterey County's Whole Person Care grant to cover base expenses of the software and system administration fees, however agencies are responsible to purchase licenses at \$400.50 per user and renewed on an annual basis. All End User licenses include standard licenses and Advanced Reporting Tool licenses. Administrator licenses are available in addition to end user licenses at no extra cost. Discretion should be used when assigning administrator rights in HMIS.

7. FORMS CONTROL

All forms required by these procedures are available from the CHSP staff and/or the CHSP website:
www.chspmontereycounty.org/hmis.

Acknowledgement

IT IS MUTUALLY UNDERSTOOD AND AGREED BY AND BETWEEN THE PARTIES THAT: All parties will demonstrate a commitment to work together and support each other to achieve project goals. Your agency agrees to provide a representative to the HMIS Oversight Committee, for the purpose of ensuring HMIS policy and procedures that is both consistent with federal and state requirements, and with the local needs of the Continuum.

The Governance Policy and Procedures will be renewed on an annual basis to confirm that the document continues to be relevant and appropriate. This form documents the mutual understanding between all parties of HMIS related roles, responsibilities, relationships, and authorities between the parties hereto.

By signing below, I agree to the HMIS Policies and Procedures Governance document and understand that this document supersedes previous versions.

Executive Director Printed Name

Agency

Signature

Date