

Toledo Homeless Management Information System (HMIS) Policies and Procedures

Purpose of HMIS

The purpose of the Toledo HMIS project is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in support of the Toledo-Lucas County Continuum of Care's CASE Plan to prevent, reduce, and eliminate homelessness.

We do this by assisting homelessness service providers in generating reports to the U.S. Department of Housing and Urban Development, the Toledo Lucas County Continuum of Care, and other funders, as well as streamlining and consolidating their internal tracking and record-keeping requirements.

Policies and Procedures Manual

1. Roles and Responsibilities

(a) Project Management

The Toledo Lucas County Homelessness Board (TLCHB) is responsible for the HMIS project under the auspices of a TLCHB/HMIS Technology Director. While the HUD HMIS grant is still held by FOCUS, the Technology Director will be employed through FOCUS and supervised by TLCHB; after the grant is moved to TLCHB, the Technology Director will be both employed and supervised by TLCHB.

(b) Project Staffing

The Technology Director has primary responsibility for coordination and administration of the Toledo HMIS and reports to the TLCHB Executive Director. At a minimum, one additional person will be employed full-time as part of the HMIS staff.

(c) Contributory HMIS Organizations

Any agency, group, or other entity that has completed an Agency Agreement with the Technology Director is a Contributory HMIS Organization (CHO). All CHO's must abide by all policies and procedures outlined in this manual, which are subject to change. CHO's must complete a CHO Agreement with the Technology Director on an annual basis. CHO's with expired CHO Agreements may have their End User accounts locked or removed to maintain the security, confidentiality, and integrity of the system. CHO's are responsible for the conduct of their End Users and the security of End User Accounts.

(d) Project Agency Administrators

Each CHO will designate an HMIS Agency Administrator to serve as primary contact between the Technology Director and the CHO, and each HMIS Agency Administrator must have a valid email address with the CHO. Each CHO should choose its HMIS Agency Administrator and send that person's name and contact information to the Technology Director. Changes to that information should be promptly reported to the Technology Director.

(e) HMIS Advisory Committee

The Technology Director will convene a committee to advise the project's operations, policies, and procedures and provide feedback on a regular basis. The Technology Director will seek out particularly skilled individuals whose breadth and depth of expertise is well-suited to the project.

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(f) HMIS End Users

In addition to an HMIS Agency Administrator, CHO's may designate other individuals to access the system on their behalf, and CHO's are encouraged to use ServicePoint as their primary tool for client and service tracking, case management, and operational reporting. The Technology Director will work with CHO's to determine the appropriate User Access Level designation for each End User.

There is no upper limit to the number of End Users each CHO may authorize, but Toledo HMIS may assess participation fees to recover the cost of ServicePoint licenses beyond that of the HMIS Agency Administrator.

All End Users, including HMIS Agency Administrators and HMIS staff, must complete an End User agreement with the Technology Director on an annual basis. End User accounts with expired End User Agreements may be locked or removed to maintain the security, confidentiality, and integrity of the system.

(h) Communication

General communications from the Technology Director will be directed toward Agency Administrators. Specific communications will be addressed to the person or people involved. The Toledo Technology Director will be available via email, phone, and U.S. mail. The ServicePoint Newsflash feature will also be used to distribute HMIS information.

Participating CHO's are responsible for communicating needs, questions, and concerns regarding the Toledo HMIS directly to the Technology Director.

(i) System Availability

Bowman Systems will provide a highly available database server and will inform Toledo HMIS staff in advance of any planned interruption in service. Whenever possible, if the database server is unavailable due to disaster or routine maintenance, Toledo HMIS staff will inform End Users of the cause and duration of the interruption in service. The Technology Director will log all downtime for purposes of system evaluation.

(j) Client Confidentiality

TLCHB, the Technology Director, other HMIS Staff and CHO's will strive to ensure and safeguard the confidentiality of all client data. No identifiable client data will be entered into the Toledo HMIS without written client consent, and no identifiable client data will be shared outside of the limits of that written consent. Only individuals authorized to view or edit individual data will have access to that data. All CHO's must prominently display a sign where ever HMIS data is collected, explaining the purpose and confidentiality of said data. The Technology Director will provide this sign to all CHO's.

(k) Client Grievances

Clients will contact the CHO with which they have a grievance for resolution of HMIS problems. CHO's will provide a copy of the Toledo HMIS Policies and Procedures Manual upon request, and respond to client issues. CHO's will send written notice to the Technology Director of any HMIS-related client grievance. The System Director will record all grievances and will report these complaints to the HMIS Advisory Committee.

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2. Security and ServicePoint Access

(a) End User Accounts

The Technology Director will provide an End User Account username and initial password to each authorized End User. End User Accounts are assigned on a per-person basis, rather than to a particular position or role. End User Accounts are not to be exchanged, shared, or transferred between personnel at any time. Sharing of End User Accounts is a breach of these Policies and Procedures and a violation of the CHO Agreement.

Under no circumstances shall a CHO demand that an End User hand over his or her username and password. CHO's shall inform the Technology Director of any changes in personnel or other requests to revoke or transfer accounts.

(b) End User Inactivity

End Users who have not logged into the system in the previous 90 days will be flagged as inactive. Inactive End Users may have their ServicePoint accounts locked or removed to maintain the security, confidentiality, and integrity of the system.

(c) Passwords

End User Account passwords must be changed every 45 days; every 45 days, the system will automatically prompt each End User to change his or her password. End Users may keep passwords written down in and stored in a purse, wallet, or other container kept on their person. Passwords should never be written on any item left in their office, desk, or other workspace, and passwords should never be in view of any other person.

(d) Connectivity and Computer Systems

CHO's will connect to ServicePoint independently via the internet and are responsible for providing their own internet connectivity and computer systems sufficient for doing so. Toledo HMIS may provide consultation or advice in securing sufficient internet connectivity and computer systems. Toledo HMIS provides technical support to CHO's solely for ServicePoint.

(e) Workstation Security

At a minimum, the primary workstation used by each End User to log in to ServicePoint should be configured to meet the following best practices:

- Password-protected log on for the workstation itself;
- Password-protected (aka locked) screensaver after five minutes or more of inactivity;
- Operating system updated with manufacturer's latest patches at least weekly;
- Ports firewalled;
- Using either Internet Explorer 8, Firefox 3, Chrome 8, or Safari 3; and
- Systems scanned at least weekly for viruses and malware.

Toledo HMIS may provide some recommendations or advise in pursuing these best practices, but proper workstation configuration remains the responsibility of each CHO.

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(f) Local Data Storage and Transfer

CHO's Users are responsible for maintaining the security and confidentiality of any client-level data extracted from the database and stored locally, including all data used in internal reporting. No identifiable client-level data is to be transmitted unless it is properly protected. Security questions should be addressed to the Technology Director.

(g) Remote System Access

CHO's and End Users must abide by these Policies and Procedures and ensure the security and confidentiality of client data regardless of the computer used to log in to the system. For this reason, End Users are strongly cautioned against extracting and storing personally identifiable client information on their personal computers and internet devices.

(h) Training

The Technology Director will coordinate adequate and timely ServicePoint training for all End Users prior to issuing an End User Account. Additionally, the Technology Director will post training aids, reference material, and other support on the TLCHB website.

3. Data Collection and Entry

(a) Standard Data Collection

CHO's will collect a required set of common data variables for each client. These common data elements will meet standards for HUD Universal Data Element (UDE) collection and Program-Specific Data Element (PDE) collection. Other Local Data Elements (LDE) and data collection protocols will be set by the TLCHB as-needed for adequate data analysis and meeting objectives of local plans.

Client Identifiers include Name, Date of Birth, Social Security Number, and Gender.

Universal Data Elements (UDE's) include all Client Identifiers, Race, Ethnicity, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Last Permanent ZIP Code, Housing Status, Household Membership, Program Entry Date, and Program Exit Date (if applicable).

Program-Specific Data Elements (PDE's) include Income Amounts & Sources, Non-Cash Benefit Amounts & Sources, Physical Disability, Developmental Disability, Chronic Health Condition, HIV/AIDS Diagnosis, Mental Health Condition, Substance Abuse, and Domestic Violence, Reason for Leaving (if applicable), and Destination (if applicable).

Local Data Elements (LDE's) include Employment, Education, General Health, Pregnancy, Veteran Details, Children's Education, and Primary Reason for Homelessness/Threat to Housing Stability.

Service and Shelter Records include an AIRS Taxonomy Code, Start and End Dates, Bed Assignment (if applicable), Amount or Units of Assistance (if applicable), HPRP Assistance Category (if applicable), Funding Source (if applicable), and Current or Arrears Designation (if applicable).

Extended Data are optional and include Case Notes, Goals, Action Steps, Follow-Up Plans, Needs, Referrals, Self-Sufficiency Matrix measurements, and Case Manager(s).

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(b) Inter-Agency Data Sharing

Client-level data in HMIS will be designated as either Open or Closed. With the exception of Client Identifiers, no client-level data is shared between agencies unless a Client Consent to Network Data Sharing/Release of Information (ROI) is logged in ServicePoint, even if the data is designated as Open. Even if an ROI is logged, Closed data is never shared between agencies.

Data Elements which are Open by default include

- UDE's: Name, Date of Birth, Social Security Number, Gender, Race, Ethnicity, Veteran Status, Residence Prior to Program Entry, Last Permanent ZIP Code, Housing Status, Household Membership, Program Entry Date, and Program Exit Date
- PDE's: Income Amounts & Sources and Non-Cash Benefit Amounts & Sources, Reason for Leaving, and Destination
- LDE's: Employment, Education, General Health, Veteran Details, Children's Education, and Primary Reason for Homelessness/Threat to Housing Stability
- Service and Shelter Records: AIRS Taxonomy Code, Start and End Dates, Bed Assignment, Amount or Units of Assistance, HPRP Assistance Category, Funding Source, and Current or Arrears Designation
- Extended Data: Case Manager(s)

Data Elements which are Closed by default include

- UDE's: Disabling Condition
- PDE's: Physical Disability, Developmental Disability, Chronic Health Condition, HIV/AIDS Diagnosis, Mental Health Condition, Substance Abuse, and Domestic Violence
- LDE's: Pregnancy
- Service and Shelter Records: None
- Extended Data: Case Notes, Goals, Action Steps, Follow-Up Plans, Needs, Referrals, and Self-Sufficiency Matrix measurements

(c) Informed Client Consent

CHO's will collect and retain signed client consent forms before any client data will be entered into the Toledo HMIS. CHO staff will thoroughly explain the client consent to each client. Toledo HMIS will provide a standard HMIS Consent for Network Data Sharing/Release of Information form to all CHO's.

If client consent is not obtained, the CHO will enter the de-identified data into an anonymous client record that is minimally necessary for the purposes of tracking of units of service.

(a) Appropriate Data Collection

Toledo HMIS End Users will only collect client data relevant to the delivery of services to people experiencing a housing crisis in Toledo and Lucas County. The Technology Director will periodically audit pick-lists and agency-specific fields to ensure the database is being used appropriately.

(b) Data Element Customization

Data element customization will be provided as needed, e.g. special projects such as preventive homeless projects in which the HMIS database is used for this data collection. Data customization will only be done after approval by the TLCHB HMIS Committee and under the direction of the Technology Director.

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4. Quality Assurance

(a) Commitment to Data Quality

CHO's are responsible for timely, accurate, and complete entry of client-level data.

(b) Data Element Completion

CHO's are responsible for completing each data element to ninety-five percent (95%) or greater at both entry and exit, as appropriate for each client.

(c) Record Completion

In addition to completion rates per element, the completeness of each client's overall program entry and exit records impact the quality of data for reporting and analysis.

Data Element Type	Record Completion (based on missing elements per record)		
	Incomplete	Partial	Complete
Universal Data Element	>3	1 to 3	None
Program-Specific Data Element	>2	2	1 or none
Local Data Element	>2	2	1 or none

Record Completion quality is based on the "weakest link" for a given record. E.g., if a program entry record has all UDE's and PDE's, but is missing 4 LDE's, that record would be considered incomplete.

(d) Data Validity/Incongruences

CHO's are responsible for providing data that is valid and congruent, defined as "data which agrees with itself." No more than one half of one percent (0.5%) of clients should exhibit any given incongruence case, which includes but is not limited to:

- Date of birth indicating negative age;
- Date of birth indicating age greater than one hundred years old;
- Date of birth same as date client was created in HMIS;
- Age inconsistent with household relationship (nine-year-old grandmother, etc.);
- Veteran status is yes but age is less than eighteen;
- Gender conflicts with household relationship (male grandmother);
- Listed as head of household but relationship to head of household is not "self";
- Not listed as head of household but relationship to head of household is "self";
- Household membership but no household relationship; and
- Client listed as pregnant but not a female between twelve and fifty-five years old.

(e) Data Integrity Expectations and Support

To ensure high quality data and ease in the generation of reports and analysis, the following data integrity expectations and supports will be observed:

- All data, including all program entries and program exits, for a given month should be completed by the sixth day of the following month;
- Toledo HMIS will provide a draft report to each CHO on the seventh day, detailing Data Element Completion, Entry/Exit Record Completion, Clients Served and Services Provided in the previous month;

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- Toledo HMIS will provide support to CHO's as-needed for corrections of the previous month's data, and CHO's are expected to make any corrections by the thirteenth day of the month; and
- Toledo HMIS will provide a second report to each CHO on the fourteenth day with updated figures

5. Data Retrieval

(a) CHO's

CHO's will have access to retrieve any client-level data entered by their programs, other data as governed by the data sharing policies and procedures in this manual, and by the Client Consent to Network Data Sharing/Release of Information.

(b) Technology Director and HMIS Staff

The Technology Director and HMIS Staff will have access to retrieve all data in the Toledo HMIS. The Technology Director and HMIS Staff will not access individual client data for purposes other than maintenance, troubleshooting, providing reports, and checking for data integrity.

(c) Bowman Systems

Bowman Systems will not access the system except for purposes of software maintenance, troubleshooting, and data conversion.

(d) Client

Any client will have access to view, or keep a printed copy of, his or her own records contained in the Toledo HMIS within a reasonable period of time. The client will also have access to a logged audit trail of changes to those records. No client shall have access to another client's records in the Toledo HMIS.

(e) Continuum of Care

The Technology Director and HMIS staff will provide de-identified and aggregate reports to the Continuum of Care as-needed in support of its mission to prevent, reduce, and eliminate homelessness.

(f) Public

Toledo HMIS, in consultation with the HMIS Advisory Committee, will address all requests for data from entities other than CHO's or clients. No client-level data will be provided to any party, even a client requesting their own data, unless the CHO who entered the data is unable to satisfy the client's request. All requests from the public for HMIS reports must be made in writing using the HMIS Report Request form, which is provided on request.

The Technology Director will compile and publish certain periodic reports for public consumption regarding homelessness and housing issues in Lucas County based on data available in HMIS. At no time will published, publicly-available reports contain client-level or identifiable data.

(l) Ethical Data Use

Data contained in the Toledo HMIS will only be used to support the delivery of homeless and housing services in Lucas County. Each HMIS End User will affirm the principles of ethical data use and client confidentiality contained in this Policies and Procedures Manual and the HMIS End User Agreement.

(m) Access to Core Database

No one will have direct access to the Toledo HMIS database. Access is provided solely through the

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ServicePoint software. In contract with Toledo HMIS, Bowman Systems will monitor access of the database server and employ security methods to prevent unauthorized database access.