Homeless Management Information System (HMIS)

Policies and Procedures

TX-700 Continuum of Care

CONTACT INFORMATION

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Website information on Houston/Harris County HMIS:

http://www.homelesshouston.org/hmis

The HMIS team provides ongoing assistance to all participating agencies. An agency can request additional training or onsite visits from the HMIS staff at any time:

http://www.homelesshouston.org/hmis/user-training/

ClientTrack Training Website:

http://www.clienttrack.net/hc_harris_train

ClientTrack Production Website:

http://www.clienttrack.net/hc_harris

HMIS help desk:

hmis@homelesshouston.org

For all issues related to HMIS & ClientTrack submit a ticket to IssueTrak:

https://hmissupport.homelesshouston.org

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PROJECT SUMMARY

Introduction

A Homeless Management Information System (HMIS) is a database used to record and track client-level information on the characteristics and service needs of homeless persons. An HMIS ties together homeless service providers within a community to help create a more coordinated and effective housing and service delivery system.

The U. S. Department of Housing and Urban Development (HUD) and other planners and policymakers at the federal, state and local levels use aggregate HMIS data to obtain better information about the extent and nature of homelessness over time. Specifically, an HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs.

The TX-700 Continuum of Care's (CoC) HMIS is staffed at the Coalition for the Homeless. The Coalition's HMIS staff is responsible for the administration of the HMIS software and providing technical assistance to participating agencies and end-users.

Agencies that participate in the TX-700 CoC's HMIS are referred to as "participating agencies." Each participating agency needs to follow certain guidelines to help maintain data privacy and accuracy. The guidelines listed in this document do not replace the more formal and legally binding agency agreement that each agency signs before program implementation.

History

In 2001, Congress instructed the U.S. Department of Housing and Urban Development (HUD) to take measures to improve available data concerning homelessness in the United States. In response, HUD mandated all Continuum of Care regions to implement region-wide databases that would allow an unduplicated count of clients served. Out of this directive came the Homeless Management Information System (HMIS), a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance service agencies, and stores that data in a centralized database for analysis.

Why is this important?

Having access to HMIS represents a strategic advantage for service providers. The HMIS software we use allows multi-level client data sharing between organizations, as well as client case coordination and electronic referrals. Our locally developed information-sharing model can prevent service duplications and enable collaboration between various homeless service providers, while limiting access to sensitive data. Client privacy is very important to us.

In addition to the standard data collection and reporting functionalities, the HMIS software includes a comprehensive case management module, bed management, performance measurement tools, ad-hoc reporting, software customization options, etc.

Lastly, providers already in HMIS are better positioned to apply for future funding opportunities, as many national and local funders now require HMIS participation.

ROLES AND RESPONSIBILITIES

Coalition for the Homeless – HMIS Responsibilities

- Execute HMIS participation agreements;
- Monitor compliance with applicable HMIS standards on a regular basis;
- Establish and review annually End User Agreements;
- Maintain and update as needed the files for HMIS software to include software agreements, HUD Technical Submissions, HUD executed agreements and Annual Progress Reports;
- Develop and maintain HMIS agency files to include original signed participation agreements, original signed user license agreements and all other original signed agreements pertaining to HMIS;
- Develop and update as needed a Data Quality Plan;
- Review and update HMIS Privacy Policy yearly;
- Develop and review annually the HMIS Security Plan;
- Review and update as needed the HMIS Policies and Procedures;
- Provide copies of the Data Quality Plan, Privacy Policy, Security Plan and Policies and Procedures to the HMIS Support Committee for review and feedback on an annual basis;
- Review national, state and local laws that govern privacy or confidential protections and make determinations regarding relevancy to existing HMIS policy;
- Provide new user training and refresher user training monthly;
- Pro-actively contact new users for immediate follow up and issuance of username and password to access HMIS in an effort to begin entry of data as soon as possible following training;
- Provide on-site technical support to agencies using HMIS for trouble-shooting and data input;
- Monthly review of HMIS data and bed lists to ensure that participating agency programs are using HMIS accurately;
- Provide assistance to agencies upon request for additional on-site training and support; and
- Conduct unduplicated accounting of homelessness annually.

Participating Agency Responsibilities

- Must comply with all applicable agreements;
- Execute and manage HMIS User License Agreements with all staff who have HMIS access;
- Comply with the HMIS Standards as appropriate; and
- Accurately enter all required data into the HMIS system, including accurate and timely information into housing, where applicable.

IMPLEMENTATION POLICIES AND PROCEDURES

HMIS Agency Participation Agreement

The Executive Director of any Participating Agency shall follow, comply, and enforce the HMIS Agency Participation Agreement (Appendix A). The Executive Director must sign an HMIS Agency Participation Agreement before granted access to HMIS. Signing of the HMIS Agency Participation Agreement is a precursor to training and user access.

- An original signed HMIS Agency Participation Agreement must be presented to the HMIS staff before any program is implemented in the HMIS.
- After the HMIS Agency Participation Agreement is signed, the HMIS staff will train end users to use HMIS.
- A username and password will be granted to end users after required training is completed.

HMIS User License Agreement

End user of any Participating Agency shall follow, comply, and enforce the HMIS User License Agreement (Appendix B). Before given access to HMIS, the end user must sign an HMIS User License Agreement.

- The HMIS staff will provide the end user a HMIS User License Agreement for signature after completing required training.
- The HMIS staff will collect and maintain HMIS User License Agreements of all end users.
- A username and password will be granted to end users after required training is completed.

Data Collection Requirements

Participating Agencies will collect and verify the minimum set of data elements for all clients served by their programs within the timeframe outlined in the HMIS Data Quality Plan (Appendix C).

- During client intake, end users must collect all the universal data elements set forth in the HMIS Data Standards Manual, October 2017. The universal data elements include:
  - Name
  - Social Security Number
  - Date of Birth
  - Race
  - Ethnicity
  - Gender
  - Veteran Status
  - Disabling Condition
  - Living Situation
  - Project Entry Date
  - Project Exit Date
  - Destination
  - Relationship to Head of Household
  - Client Location
  - Personal ID
  - Household ID

- End users must also collect all the program-specific data elements at program entry and exit set for in the HMIS Data Standards Manual, October 2017. The program-specific data elements include:
  - Housing Status
  - Income and Sources
  - Non-Cash Benefits
  - Health Insurance
  - Physical Disability
  - Developmental Disability
  - Chronic Health Condition
  - HIV/AIDS
  - Mental Health Problem
  - Substance Abuse
  - Domestic Violence
  - Contact
  - Date of Engagement
  - Services Provided
  - Financial Assistance Provided
  - Referrals Provided
  - Residential Move-In Date
  - Housing Assessment Disposition
  - Housing Assessment at Exit

HMIS Program Entry and Exit Date

End users of any Participating Agency must record the Program Entry Date of a client into HMIS no later than the following for each program type:

- Emergency Shelters: One (1) workday (24 work hours after the check-in/check-out time)
- Transitional and Permanent Supportive Housing Programs: Five (5) workdays
- Rapid Re-Housing and Homelessness Prevention Programs: Five (5) workdays
- Outreach Programs: Three (3) workdays
- Supportive Services Only Programs: Three (3) workdays

End Users of any Participating Agency must record the Program Exit Date of a client into HMIS no later than three (3) business days after exiting the program or receiving their last service. Enabling the “auto-exit” feature for programs is available at the Participating Agency’s discretion. If enabled, clients enrolled in the program will automatically exit after the defined number of days of not receiving services defined as a “participating service” for that program, and record the date of the client’s last day in the program as the last day a service was provided.

- End user must enter the month, day, and year of program enrollment and program exit.
- For returning clients, end user must record a new Program Entry Date and corresponding Program Exit Date.
- The system will trigger a warning when end users enter a Program Exit Date that is earlier than the Program Entry Date for a client.

HMIS Technical Support Protocol

The HMIS staff will provide a reasonable level of support to Participating Agencies via email, phone, and/or remote.

1. HMIS Users should first seek technical support from their agency HMIS expert.
2. If more expertise is required to further troubleshoot the issue, agency HMIS expert or HMIS User should submit request to:

- IssueTrak at https://hmissupport.homelesshouston.org for all issues related to ClientTrack, or
- HMIS Support for general technical support at hmis@homelesshouston.org. Refrain from sending email correspondence directly to the HMIS Support Team.

3. Technical Support Hours are Monday through Friday (excluding holidays) from 8:00 AM to 4:00 PM.
4. Provide issue replication details if possible (or help recreate the problem by providing all information, screenshots, reports, etc.) so HMIS staff can recreate problem if required.
5. The HMIS staff will try to respond to all email inquiries and issues within three (3) business days, but support load, holidays, and other events may affect response time.
6. The HMIS staff will submit a ticket to software vendor if progress is stalled.

Participation Fees

The TX-700 CoC does not charge a fee for HMIS participation. However, the CoC reserves the right to change this policy should future needs require it.

SECURITY POLICIES AND PROCEDURES

Training

Each end user must complete the required New User Training prior to gaining access to HMIS. HMIS staff will provide training to all end users

- HMIS staff will provide New User Training to proposed end users.
- HMIS staff will provide new end users with a copy of the HMIS Policies and Procedures and HMIS User Guide.
- The table below lists the training courses offered.

Course Description	Course Detail
New User Training	Users will learn the basic skills and concepts needed in order to complete the client intake process.
Refresher Training	Help to refresh the skills of active users, as well as review any issues users may have with navigating through the system or the data collection process.
Reports Training	Users are given an overview of the various reporting options available in ClientTrack.
Data Explorer	Trains experienced users, with good knowledge of existing ClientTrack reports, on the usage of ClientTrack's ad hoc data analysis tool. (Limited to one user per agency per session)

User Authentication

Only users with a valid username and password combination can access HMIS. The HMIS staff will provide unique username and initial password for eligible individuals after completion of required training and signing of the HMIS User License Agreement.

- The Participating Agency will determine which of their employees will have access to the HMIS. User access will be granted only to those individuals whose job functions require legitimate access to the system.
- Proposed end user must complete the required training and demonstrate proficiency in use of system.
- Proposed end user must sign the HMIS User License Agreement stating that he or she has received training, will abide by the Policies and Procedures, will appropriately maintain the confidentiality of client data, and will only collect, enter and retrieve data in the system relevant to the delivery of services to people.
- The HMIS staff will be responsible for the distribution, collection, and storage of the signed HMIS User License Agreements.
- The HMIS staff will assign new users with a username and an initial password.
- Sharing of usernames and passwords is a breach of the HMIS User License Agreement since it compromises the security to clients.
- The Participating Agency is required to notify the HMIS staff when end user leaves employment with the agency or no longer needs access.
- Users not logging into HMIS for more than 45 days will be locked out due to non-activity.

Passwords

Each end user will have access to HMIS via a username and password. Passwords will be reset every 180 days. End users will maintain passwords confidential.

- The HMIS staff will provide new end users a unique username and temporary password after required training is completed.
- End user will be required to create a permanent password that is between eight and sixteen characters in length. It must also contain characters from the following four categories: (1) uppercase characters (A through Z), (2) lower case characters (a through z), (3) numbers (0 through 9), and (4) non-alphabetic characters (for example, $, #, %).
- End users may not use the same password consecutively, but may use the same password more than once.
- Access permission will be revoked after the end user unsuccessfully attempts to log on five times. The end user will be unable to gain access until the HMIS staff reset their password.

Hardware Security Measures

All computers and networks used to access HMIS must have virus protection software and firewall installed. Virus definitions and firewall must be regularly updated.

Security Review

HMIS staff will complete an annual security review to ensure the implantation of the security requirements for itself and Participating Agencies. The security review will include the completion of a security checklist ensuring that each security standard is implemented.

Security Violations and Sanctions

Any end user found to be in violation of security protocols of their agency's procedures or HMIS Policies and Procedures will be sanctioned accordingly. All end users must report potential violation of any security protocols.

- End users are obligated to report suspected instances of noncompliance and/or security violations to their agency and/or HMIS staff as soon as possible.
- The Participating Agency or HMIS staff will investigate potential violations.
- Any end user found to be in violation of security protocols will be sanctioned accordingly. Sanction may include but are not limited to suspension of system privileges and revocation of system privileges.

CLIENT INFORMED CONSENT AND PRIVACY RIGHTS

Participating Agencies must obtain informed, signed consent prior to entering any client personal identifiable information into HMIS. Services will not be denied if a client chooses not to include personal information. Personal information collected about the client should be protected. Each Participating Agency and end user must abide by the terms in the HMIS Agency Participation Agreement (Appendix A) and HMIS User License Agreement (Appendix B).

- Client must sign the Authorization to Disclose Client Information form (Appendix D) or consent of the individual for data collection may be inferred from the circumstances of the collection.
- Clients that provide permission to enter personal information allow for Participating Agencies within the continuum to share client and household data.
- If client refuses consent, the end user should not include any personal identifiers (First Name, Last Name, Social Security Number, and Date of Birth) in the client record.
- For clients with consent refused, end user should include a client identifier to recognize the record in the system.
- Participating Agencies shall uphold Federal and State Confidentiality regulations and laws that protect client records.

The HMIS standards and the HIPAA standards are mutually exclusive. An organization that is covered under the HIPAA standards is not required to comply with the HMIS privacy or security standards, so long as the organization determines that a substantial portion of its protected information about homeless clients or homeless individuals is indeed protected health information as defined in the HIPAA rules.

HIPAA standards take precedence over HMIS because HIPAA standards are finely attuned to the requirements of the health care system; they provide important privacy and security protections for protected health information; and it would be an unreasonable burden for providers to comply with and/or reconcile both the HIPAA and HMIS rules. This spares organizations from having to deal with the conflicts between the two sets of rules.

DATA POLICIES AND PROCEDURES

Data Quality

All data entered into HMIS must meet data quality standards. Participating Agencies will be responsible for their users' quality of data entry.

Definition:
Data quality refers to the timeliness, completeness, and accuracy of information collected and reported in the HMIS.

Data Timeliness:
End users must enter all universal data elements and program-specific data elements using the guidelines identified in the HMIS Data Quality Plan (Appendix C).

Data Completeness:
All data entered into the system is complete.

Data Accuracy:
All data entered shall be collected and entered in a common and consistent manner across all programs.

- Participating Agencies must sign the HMIS Agency Participation Agreement (Appendix A) to ensure that all participating programs are aware and have agreed to the data quality standards.
- Upon agreement, Participating Agencies will collect and enter as much relevant client data as possible for the purposes of providing services to that client.
- The HMIS staff will conduct monthly checks for data quality. Any patterns of error or missing data will be reported to the Participating Agency.
- End users will be required to correct the identified data error and will be monitor for compliance by the Participating Agency and the HMIS staff.
- End users may be required to attend additional training as needed.

Data Use and Disclosure

All end users will follow the data use Policies and Procedures to guide the data use of client information stored in HMIS.

Client data may be used or disclosed for system administration, technical support, program compliance, analytical use, and other purposes as required by law. Uses involve sharing parts of client information with persons within an agency. Disclosures involve sharing parts of client information with persons or organizations outside an agency.

- Participating Agencies may use data contained in the system to support the delivery of services to homeless clients in the continuum. Agencies may use or disclose client information internally for administrative functions, technical support, and management purposes. Participating Agencies may also use client information for internal analysis, such as analyzing client outcomes to evaluate program.

- The vendor and any authorized subcontractor shall not use or disclose data stored in HMIS without expressed written permission in order to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes. The Service and License Agreement signed individually by the HMIS Lead Agency and vendor contain language that prohibits access to the data stored in the software except under the conditions noted above.

Data Release

All HMIS stakeholders will follow the data release Policies and Procedures to guide the data release of client information stored in HMIS.

Data release refers to the dissemination of aggregate or anonymous client-level data for the purposes of system administration, technical support, program compliance, and analytical use.

- No identifiable client data will be released to any person, agency, or organization for any purpose without written permission from the client.

- Aggregate data may be released without agency permission at the discretion of the Continuum. It may not release any personal identifiable client data to any group or individual.

APPENDICES

Appendix	Document Title
Appendix A	HMIS Agency Participation Agreement
Appendix B	HMIS User License Agreement
Appendix C	HMIS Data Quality Plan
Appendix D	Authorization to Disclose Client Information
Appendix E	Privacy Policy