Columbus-Muscogee / Russell County Continuum of Care Homeless Management Information System (CM/RC CoC-HMIS)

Policy and Procedures Manual

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Managed by:
Home for Good
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WHAT IS HMIS?

Columbus-Muscogee / Russell County Continuum of Care Homeless Management Information System (CM/RC CoC-HMIS), is designed for Contributing HMIS Organizations (CHOs) CHOs that provide housing and services to homeless people.   Counties or Continuum's of Care (CoC) are required by the U.S. Department of Housing and Urban Development (HUD) [CoC Program interim rule 24 CFR 578] to operate an HMIS and meet all requirements. Programs targeted for participation include outreach services, supportive services for homeless persons, homelessness prevention and intervention, emergency shelter, transitional housing, and permanent supportive housing.   Beyond meeting the HUD requirements, it is the goal of CM/RC COC-HMISto assist organizations in recording and tracking client service data and generating reports, providing information helpful to funders, planners and policy makers, and to increase the coordination among organizations.

MISSION

The mission of Columbus-Muscogee / Russell County CoC HMIS is to identify gaps in homeless services delivery, provide reporting resources for homeless services providers and funders, reduce duplicate efforts for both providers and recipients of homeless services, and facilitate access to services for persons who are homeless or at imminent risk of becoming homeless.

BENEFITS OF HMIS

The benefits of the CM/RC COC-HMISare to:
- Inform government and the community about the extent and nature of homelessness in the Columbus-Muscogee / Russell County area.

- Assist in numerous planning processes including but not limited to the 10 year plan to End Homelessness, Continuum of Care planning, and the Consolidated Plan.

- Enable organizations to have accurate information about the clients they serve.

- Provide information on successes and challenges of homeless programs.

- Prepare informational reports for funders.

- Facilitate funding needed for housing and other related services, thereby ultimately benefiting homeless households.

- Enable the participating CHOs and the community to understand client needs, resources and gaps through the use of aggregated data.

- Help programs identify processes that are problematic, support redesign efforts, and improve the quality of the services provided by the organization.

Benefits of using the (CM/RC CoC-HMIS)**:**
- Automated reporting – complete monthly, quarterly, and annual reports for key funders (including local funders, the State & HUD) with training.

- No technical expertise or IT staff required – the CM/RC COC-HMISis centrally maintained and training is provided for all CM/RC COC-HMISusers by the HMIS Administrators

- Designed to meet HUD, HIPAA, and local provider needs

- Captures changes in clients' needs over time

- Enables client data sharing between CHOs when programs and clients agree, eliminating redundant intake forms for clients and service providers.

STAGES OF IMPLEMENTATION

STAGE 1: INITIATING ORGANIZATION HMIS PARTICIPATION (FOR NEW ORGANIZATIONS)

1. Complete the training on use of forms (CM/RC COC-HMIS Client Consent form, Privacy Policy).
2. An Internet connection—DSL or Cable with static IP address is secured for the CHO.
3. A CHO HMIS Contact is designated by the CHO.
4. CHO completes and submits to the HMIS administrator all participation agreement materials including:
   - Signed CM/RC COC-HMIS Organization Partner Agreement
   - Signed CM/RC COC-HMIS User Agreement form for each individual user that will be using CM/RC CoC HMIS.
5. The CHO director designates organization staff to receive access to the system.
6. The HMIS Administrator(s) visit the site to assist the CHO CM/RC COC-HMISContact in initial operative tests on the program's equipment and completeness of security checklist (if needed).

STAGE 2: DATA ENTRY BEGINS

1. The CM/RC COC-HMIS Contact and users receive training on using the CM/RC COC-HMIS application.
2. Access codes and passwords are assigned for all end-users.
3. Data entry begins and includes the required data elements.
4. The HMIS Administrators are available for a site visit to assist with any questions after initial use of system.
5. The HMIS Administrators track problems, opportunities to improve the process and track coverage.

STAGE 3: SYSTEM FULLY INTEGRATED IN DAILY OPERATION

1. CHO specific training is provided on querying reports and additional functions accessed in the CC-HMIS.
2. CHOs begins using the information for internal evaluation and reporting requirements.

MAINTENANCE OF DATA AND ONSITE COMPUTER EQUIPMENT

Policy: CHOs commit to a reasonable program of data and equipment maintenance in order to sustain an efficient level of system operation.

Standard: CHOs must meet the technical standards for minimum computer equipment configuration, internet connectivity, data storage and data backup.

Purpose: To ensure that CHOs adopt an equipment and data maintenance program.

Responsibilities:
The CHO staff or designee will be responsible for the maintenance and disposal of on-site computer equipment and data used for participation in the CM/RC COC-HMISProject as follows:

- **Computer Equipment:** Each CHO is responsible for maintenance of their computer equipment. This includes purchase of and upgrades to all existing and new computer equipment for utilization in CC-HMIS.

- **Backup:** ClientTrack is responsible for supporting a backup procedure for the server on which the CM/RC COC-HMIS database resides.

- **Internet Connection:** CHOs are responsible for troubleshooting problems with their agency's Internet Connections.

- **Data Storage:** ClientTrack is responsible for storing data in a secure format and for performing daily backups of the data.

- **Data Disposal:** The CHO is responsible for disposing of documents that contain identifiable client level data by shredding paper records, deleting any information from any recording media used to retain digital data before disposal, and deleting any copies of client level data from the hard drive of any machine before transfer or disposal.
  - **Retention of paper copies of personally identifying information:** The CHO may not retain paper copies of personally identifying information derived from CM/RC COC-HMIS longer than seven years after the last day the person is served by the CHO. Paper copies will be destroyed through the use of a paper shredder or through a contract with a shredding management company.

Minimum Workstation Requirements: User's computers must have, at a minimum, a DSL connection or faster connection to the internet. ClientTrack is designed to run on Microsoft Internet Explorer version 7.0 and higher or Google Chrome. Operation of Client Track is dependent on the browser, not on the operating system installed on the computer.

CONFIDENTIALITY

Confidentiality of the data in the system is of the utmost importance. The information in this system is confidential. Confidential information is sensitive or secret information, or information whose unauthorized disclosure could be harmful or prejudicial. Only those who have been explicitly granted their own Login ID and password by the HMIS Administrators may access this system. Any printed information obtained from this system must also be treated as confidential.

ROLES

The HMIS Administrators are responsible for:

- System Administration

- Authorizing usage and access to the CC-HMIS.

- Limiting access to users who need access to the system for technical administration, data entry, editing of client records, viewing of client records, report writing, administration of other essential activity associated with carrying out HMIS responsibilities.

- Developing reports and presenting data.

- Mining the database to respond to the information needs of CHOs, community stakeholders and consumers.

- Documenting work on the database and in development of reports/queries.

- Provision of technical assistance as needed with program sites.

- Providing training to CHOs on policies and procedures, system use, authorizing access to the system including set-up, in response to questions from users, and in response to network and system functionality questions.

- Coordinating technical support for the system.

- Communicating with CHOs regarding problems with entry and to support data quality.

- Monitoring CHO participation including timeliness and completeness of entry.

- Communicating any planned or unplanned interruption in service.

- Reviewing and communicating as needed pertaining to the CHOs' monthly quality assurance reports.

- Auditing Policy and Procedure compliance.

ClientTrack is responsible for:

- Administration of the internal network.
- Administration of product servers including web and database.
- Monitoring access to these systems through auditing.
- Monitoring functionality, speed and database backup procedures.
- Backup and recovery of internal and external networks.
- Operating the system web site twenty-four hours a day, seven days a week.
- Communicating any planned or unplanned interruption of service to an HMIS Administrator.

All Columbus-Muscogee / Russell County HMIS users are responsible:

- To be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure.
- For reporting security violations.
- For complying with relevant policies and procedures.
- For their actions and for any actions undertaken with their usernames and passwords.

CONTACTS

Columbus-Muscogee / Russell County HMIS

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Columbus-Muscogee / Russell County HMIS CoC CHO Partners:

- Chattahoochee Valley Jail Ministry
- Homeless Resource Network
- House of T.I.M.E
- New Horizons CSB
- Open Door Community House
- Salvation Army
- Stewart Community Home
- Valley Interfaith Promise
- Home for Good
- Dept of Community Affairs
- Piedmont Columbus Regional
- Eccovia Solutions

PARTICIPATION REQUIREMENTS

Reminder: CHOs may not use the CC-HMIS, participation or data as a reason to deny services or housing to a client.

Policy: CHOs agree to use the following procedures in implementing the CM/RC COC-HMISat an organization level.

Training: Adhere to the commitment of site Agency Administrators and designated staff persons to attend training(s) prior to accessing the system online.   In the event the Agency Administrator changes, then the new administrator must attend training before accessing the CC-HMIS.   Training can be coordinated by contacting an HMIS Administrator.

The basic training provided to CHOs will, at minimum, include the following:
- Introduction to the CM/RC COC-HMIS
- Review of applicable policies and procedures, including relevant security policies
- Connecting to the Internet
- Logging on to the HMIS
- Entering client information including data from Intake, Ongoing Assessment, and Discharge
- Ensuring good quality data
- Overview of system administrative functions
- Entering and updating information pertaining to the CHO.
- Oversight of data quality
- Sessions will be designed and coordinated by HMIS Administrators.
- Advanced training will be provided as requested by individual CHOs, subject to availability.

HMIS User Agreement
- Each user must sign a CM/RC COC-HMIS User agreement stating full understanding of system rules and protocols before receiving a username and password to access the system.   These agreements will be reviewed annually.
- Each user must receive training in the use of the CM/RC COC-HMIS from an HMIS Administrator.
- CHOs will request the number of users accessing the CC-HMIS; each user must have his or her individual username and password and must not share that information with anyone else.   Sharing is strictly prohibited.
- CHO Directors must approve each individual user from their CHO.
- Access permission is contingent on continued employment at the CHO, and will be terminated immediately if the user is no longer employed by the CHO.
- CHO will notify an HMIS Administrator immediately if a user's employment is terminated; in an effort to revoke access rights.

Data Protocols:
- Only authorized users may view or update client data.
- CHOs must have signed CM/RC COC-HMIS Client Consent forms prior to data entry.
- Each adult member of a household that is receiving housing or services will be expected to sign the CM/RC COC-HMIS Client Consent for Network Data Sharing Form.
- Consent for data entry for minors will be provided by the parent/guardian.
- If the client refuses entry of identified information into HMIS, the CHO must have a mechanism in place to track the entry of de-identified information.
  - Additionally, the CHO will only use the first name, last name combination of "anonymous, anonymous," and nothing else for de-identified clients. (*The Lead agency is currently looking at best practices on this subject, and will update later based on what is learned.)*
- A client always has the right to view his or her own data and request corrections.

Aggregate Data Sharing and Release:
- Each CHO, in partnership with the CC-HMIS, owns the client data for housing and/or services provided by them.
- CHOs are encouraged to use their own HMIS data for public relations, reporting and funding as long as client confidentiality is maintained.
- Aggregate HMIS homeless data (not client specific) will be published at an interval (TBD) by CC-HMIS.   Any CHO may use published HMIS data.
- CM/RC COC-HMIS staff may use HMIS data for planning, research and analysis, reporting, and grant writing processes including the Continuum of Care application, the Consolidated Plan, HUD reporting, etc., and may reconcile and release aggregate data.
- Client confidentiality needs to be upheld, and a signed release must specify that the client agrees to have their data shared with other HMIS partner CHOs.

Participation Agreement and Standards:
CHOs are required to sign a participation agreement stating their commitment to adhere to the policies and procedures for effective use of the system and proper collaboration with HMIS.
- Universal and Program Data Elements are to be entered into HMIS system within one week of a residential intake.   (Residential = emergency shelter stay, transitional housing stay, permanent-supportive housing stay, prevention and rapid re-housing subsidy assistance)
- Additional Services and program-specific data is to be entered into the HMIS system within one week of the client exiting the housing stay or receiving a services only service.
- Quality assurance reports will be generated monthly and reviewed to verify data quality.
- Client's identified information entered in HMIS must be based on the CM/RC COC-HMISClient Consent form and cannot be based on CHO policy.

PRIVACY PROTECTION PROTOCOLS

CM/RC COC-HMIS Client Consent form: These must be signed by clients to authorize the entry and/or sharing of their personal information electronically with other participating CHOs through the HMIS where applicable.

Posting of the HMIS Privacy Notice: The HMIS Privacy Notice must be posted and clearly visible to clients at any data collection station.

Individual Data Sharing, Release and Confidentiality: The CM/RC COC-HMISClient Consent form does not authorize the CHO to release information about a client from the database; except to other CHOs..

Grievance Procedure:
A CHO client has the right to appeal his or her individual issues related to HMIS in accordance with CHO dictated grievance policy. If no grievance procedure is in place as it relates to HMIS, it may be appealed by the following progression:
1. Case Worker
2. Case Worker's Supervisor
3. Executive Director of the CHO.

SECURITY - CHOs

Policy: Access to all of computing, data communications and sensitive data resources will be controlled.   Access is controlled through user identification and authentication.   Users are responsible and accountable for work done under their personal identifiers.   Access control violations must be monitored, reported to the CoC and HMIS Committee, and resolved.   CHO staff will work to ensure that all sites receive the security benefits of the system while complying with all written policies.

Physical Security: CHOs must develop rules to address unattended workstations and physical access to workstations which minimize the risk of confidential data being accessed by unauthorized persons. Monitors displaying client data should be oriented to minimize viewing by unauthorized people. Workstations should automatically turn on a password protected screen saver when the workstation is temporarily not in use.

Access to data:
   A. **User Access:**   Users will only be able to view the data entered by users of their own CHO or shared client records.   Security measures exist within the HMIS system which restricts CHOs from viewing each other's data without permission.

   B. **Raw Data:**   Users can perform reporting functions which will address each CHO and programs' individual data.

   C. **CHO Policies Restricting Access to data:**   Each CHO must establish internal access to data protocols.   These policies should include who has access, for what purpose, user account sharing and how they can transmit this information.   Other issues to be addressed include storage, transmission and disposal of these data.