2-1-1 Orange County HMIS: Policies and Procedures

2018

Table of Contents

Key Terms and Acronyms

Term	Acronym (if applicable)	Definition
2-1-1 Orange County	211OC	Orange County's HMIS Lead Agency.
Agency Administrator	AA	The HMIS User designated by their agency to serve as Agency Administrator is responsible for training new HMIS Users and data quality management, among other duties described on pages 5 - 7
Agency Agreement		The agreement form between OC HMIS participating agencies and 211OC that specifies the rights and responsibilities of the participating agency and 211OC regarding the use of HMIS.
Continuum of Care	CoC	Planning body charged with guiding the local response to homelessness.
Client Identifying Information	CII	Client Identifying Information is a category of sensitive information that is associated with an individual person, and should be accessed only on a strict need-to-know basis and handled and stored with care. This category includes but is not limited to: First names, last names, dates of birth, and Social Security Numbers.
Coverage Rate		Coverage rate refers to the percentage of the homeless population in a geographic area that is measured on the HMIS, divided by the total number of homeless persons in that geographic area. Coverage estimates are used to project a total homeless count if there are homeless service providers in a jurisdiction that do

		not participate in the OC HMIS. (These may include persons served in Domestic Violence Providers or other non-participating Shelters or Outreach Projects.)
Department of Health and Human Services	HHS	The United States Department of Health and Human Services (HHS), also known as the Health Department, is a cabinet-level department of the U.S. federal government with the goal of protecting the health of all Americans and providing essential human services.
The Health Insurance Portability and Accountability Act of 1996	HIPAA	The Health Insurance Portability and Accountability Act of 1996, particularly the Privacy Rule under Title II, regulates the use and disclosure of Protected Health Information (PHI) held by covered entities and business associates. HIPAA is the base operational privacy rule on which the MSHMIS privacy rule is structured.
Housing Inventory Chart	HIC	The HIC Chart is where all residential projects (both HMIS participating and non-participating) specify the number of beds and units available to homeless persons within a jurisdiction.
Homeless Management Information System	HMIS	A data system that meets HUD's HMIS requirements and is used to measure homelessness and the effectiveness of related service delivery systems. The HMIS is also the primary reporting tool for HUD homeless service grants as well as for other public streams of funding related to homelessness.
HMIS Lead Agency		Agency, organization or government department designated by CoC to administer and manage the HMIS.
Housing Opportunities for Persons with AIDS	HOPWA	HOPWA provides housing assistance and related supportive services for persons with HIV/AIDS, and family members who are homeless or at risk of homelessness. This project has different project reporting requirements than the other HUD funded projects in this document.
Length of Stay	LOS	The number of days between the beginning of services and the end of services. It is calculated using entry and exit dates or shelter stay dates, depending on the project's method of tracking bed nights.
Point in Time Count	PIT	An annual count, usually in the last week in January that is required for all CoCs. Every other year, the PIT Count must include an "unsheltered" or street count.
Policies and Procedures Acknowledgement Form		The form signed by prospective HMIS users indicating that they have read and understood the entire 211OC HMIS Policies and Procedures document. This form is required to be on file with 211OC before users are issued HMIS accounts.
Projects for Assistance in Transition from Homelessness	PATH	PATH is funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). It provides services to mentally ill homeless people, primarily through street outreach, to link them to permanent community housing. This project has different reporting requirements than HUD funded projects and uses HMIS to collect this information.
Project Types		HUD defines 12 Project Types in HMIS: • **Homelessness Prevention** - A project that offers services and/or financial assistance necessary to prevent a person from moving into an emergency shelter or place not meant for human habitation. • **Street Outreach** - A project that offers services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Only persons who are "street homeless" should be entered into a street outreach project. Projects that also serve persons other than "street homeless" must have two separate projects to be set up in an HMIS – one 'Street Outreach' and the other 'Services Only.'

		Emergency Shelter - A project that offers temporary shelter (lodging) for the homeless in general or for specific populations of the homeless. Requirements and limitations may vary by program, and will be specified by the funder. **Day Shelter** - A project that offers daytime facilities and services (no lodging) for persons who are homeless. **Transitional Housing** - A project that provides temporary lodging and is designed to facilitate the movement of homeless individuals and families into permanent housing within a specified period of time, but no longer than 24 months. Requirements and limitations may vary by program, and will be specified by the funder. **Safe Haven** - A project that offers supportive housing that (1) serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low demand services and referrals for the residents. **PH - Rapid Re-Housing** - A permanent housing project that provides housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. **PH - Permanent Supportive Housing (disability required for entry)** - A project that offers permanent housing and supportive services to assist homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently. **PH – Housing with Services (no disability required for entry)** - A project that offers permanent housing and supportive services to assist homeless persons to live independently, but does not limit eligibility to individuals with disabilities or families in which one adult or child has a disability. **PH - Housing Only** - A project that offers permanent housing for persons who are homeless, but does not make supportive services available as part of the project. **Coordinated Assessment** - A project that administers the continuum's centralized or coordinated process to coordinate assessment and referral of individuals and families seeking housing or services, including use of a comprehensive and standardized assessment tool. **Services Only** - A project that offers only stand-alone supportive services (other than outreach) to address the special needs of participants (such as child care, employment assistance, and transportation services) and has associated housing outcomes. **Other** - A project that offers services, but does not provide lodging, and cannot otherwise be categorized as another project type, per above. Any project that provides only stand-alone supportive services (other than outreach) and has no associated housing outcomes should be typed 'Other.' For example, a project funded to provide child care for persons in permanent housing or a dental care project funded to serve homeless clients should be typed 'Other.' A project funded to provide ongoing case management with associated housing outcomes should be typed 'Services Only.'

The US Department of Veterans Affairs	VA	The US Department of Veterans Affairs provides patient care and federal benefits to veterans and their dependents.
User Agreement		The agreement form between individual users and 211OC that outlines a user's responsibilities when using HMIS. This form is required to be on file with 211OC before users are issued HMIS accounts.

211OC: HMIS Lead Agency Contact Information

OC HMIS Information Website	http://ochmis.org/
OC HMIS Training Website	http://training.ochmis.org/
OC HMIS Login	https://oc.clarityhs.com/login
HMIS Helpdesk	http://ochmis.211oc.happyfox.com/home

I.   Background & Purpose

The Homeless Management Information System (HMIS) is the electronic data collection system utilized by the Orange County Continuum of Care to comply with the responsibilities outlined in 24 CFR 578.7(b) for designating and operating an HMIS. HMIS is the local information technology system that HUD recipients and sub-recipients use for homeless assistance programs as authorized by the McKinney-Vento Homeless Assistance Act. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act codifies in law certain data collection requirements integral to HMIS. The HEARTH Act requires that HUD ensure operation of and consistent participation by recipients and sub-recipients in HMIS.

In addition, the HEARTH Act required HUD to establish standards related to HMIS, including standards related to encryption of the data collected and the rights of persons receiving services under the McKinney-Vento Act. On December 9, 2011, HUD continued its process of implementing the HEARTH Act by publishing 24 CFR Parts 91, 576, 580, and 583- the Homeless Management Information Systems Requirements. This proposed rule add a new part to the Code of Federal Regulations to regulate the administration of HMIS and the collection of data using HMIS, as provided for by the HEARTH Act (24 CFR part 580). The proposed rule also makes corresponding changes to HUD's regulations for Consolidated Submissions for Community Planning and Development Programs, at 24 CFR part 91; the Emergency Solutions Grants program, at 24 CFR part 576; the Shelter Plus Care Program, at 24 CFR part 562; and the Supportive Housing Program, at 24 CFR part 583. The proposed rule implements the HMIS requirement in the HEARTH Act and makes mandatory the practices that HUD previously provided as guidance.

The U.S. Department of Housing and Urban Development (HUD) and other planners and policymakers use aggregate HMIS data to better inform homeless policy and decision making at the federal, state, and local levels. HMIS enables HUD to collect national-level data on 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. Data on homeless persons is collected and maintained at the local level. HMIS implementations can encompass geographic areas ranging from a single county to an entire state.

The HEARTH Act also requires that all communities have an HMIS with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. Through their HMIS, a community should be able to collect information from projects serving homeless families and individuals to use as part of their needs analyses and to establish funding priorities. The Act also codifies into law certain data collection requirements integral to HMIS. With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and sub-recipients of CoC Program and Emergency Solutions Grants (ESG) funds.

An HMIS can be used to:

- Produce an unduplicated count of persons experiencing homelessness for each CoC
- Describe the extent and nature of homelessness locally, regionally, and nationally
- Identify patterns of service use
- Measure program effectiveness

The ensuing set of HMIS Policies and Procedures documents the Orange County Continuum of Care's operation of its HMIS and acts as a guide to its continuing operation in compliance with the CoC and ESG Regulations and Interim Rules.

II.   Policies and Procedures Summary

This document serves as the minimum standards of participation in the Orange County HMIS and represents general best practices. Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities. PATH, HOPWA, and VA providers have operating rules specific to HHS and VA.

211OC will update this document at any time when necessary due to HUD or CoC changes. The latest versions of the HUD HMIS Data Standards Manual and Data Dictionary are the basis for all programming specifications and requirements of HMIS. Updates will be brought to the Data and Performance Management Committee and the CoC Board for approval. Upon approval, updates to this document will be announced to all Agency Administrators via email and posted on the OC HMIS website. The most recently updated version of this document is the only version that is considered valid and supersedes all previous versions.

III.   HMIS Lead Agency Responsibilities

      a. Provide HMIS User training as needed.
      b. Develop and maintain training materials for all HMIS trainings.
      c. Create HMIS User accounts and control access to HMIS.

     d. Communicate all system-wide changes to Agency Administrators via direct emails, announcements on ochmis.org and/or monthly webinars.

     e. Host HMIS User Meetings open to all HMIS Users to discuss the use and implementation of HMIS.

     f. Provide technical support to Agency Administrators via the HMIS Help Desk and the HMIS Help Desk phone line at (714) 589-2360.

        i. HMIS Help Desk hours are Monday through Friday, excluding holidays, from 9AM to 5PM.

        ii. HMIS Staff strives to answer all technical support tickets within three (3) business days, but work load, holidays, and number of available staff may delay response.

        iii. Only HMIS Help Desk requests received by the HMIS Help Desk phone number (714-589-2360) and the HMIS Help Desk (http://ochmis.211oc.happyfox.com/home) will receive a response.

     g. Serve as intermediary between Participating Agencies and the HMIS vendor.

        i. Alert the HMIS vendor to all HUD deadlines for data standards changes, required reporting specifications, etc.

        ii. Complete software testing as needed.

        iii. Submit tickets on behalf of Participating Agencies when 211OC HMIS Staff is not able to solve a technical issue.

        iv. The OC HMIS will be available to HMIS Users at a minimum of 99.95% of the monthly billing cycle. 211OC will inform all HMIS Users of any planned or unplanned service outages via direct email or announcement on ochmis.org.

        v. Facilitate access to system level data.

IV. Participating Organization Requirements

     a. Submit an HMIS Participating Agency Agreement

        i. Participating agencies must submit an HMIS Participating Agency Agreement, signed by the agency's Executive Director with a WET (not digital) signature before any agencies or projects can be set up in HMIS.

        ii. This document must be current as of each operating year, with new agreements being signed during the annual HMIS Agency Audit.

     b. Designate an Agency Administrator and Backup Agency Administrator

        i. The Executive Director of each participating agency must submit the contact information for an Agency Administrator and Backup Agency Administrator to 211OC.

     c. Comply with all federal and state laws and regulations, and with all HMIS policies and procedures and particularly the latest versions of the HMIS Data and Technical Standards Final Notice and the HMIS Data Standards Manual relating to the collection, storage, retrieval, and dissemination of client information as well as their respective agency's privacy procedures.

     d. When applicable, partner agency may be obligated to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), and/or with 42 CFR Part 2, regarding the confidentiality of substance use disorder patient records. Where possible, these agencies should comply with HIPAA, with 42 CFR Part 2, and with the HMIS Privacy Plan. If it is not

possible to reconcile all of the applicable rules, then agencies should comply with the more stringent regulations. Agencies and programs are responsible for ensuring HIPAA and 42 CFR Part 2 compliance.

    e. Abide by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA).

    f. Participate in an annual HMIS Agency Audit to ensure compliance with the HMIS Policies and Procedures.

V. Agreements and Certifications

Visit the HMIS Documents page to view all HMIS Documents, which have been bolded below.

    a. Agency Agreements and Certifications - All OC HMIS Participating Agencies must have updated versions of the documents below on file with 211OC in order to gain and retain access to the OC HMIS.

        i. **Interagency Data Sharing Consent Form** – Allows client level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt from the data sharing mandate due to privacy laws protecting clients' HIV status. The Interagency Data Sharing Consent Form must be signed by the participating agency's Executive Director with a WET (not digital) signature.

        ii. **HMIS Participating Agency Agreement** – Outlines the participating agency's responsibilities in protecting client privacy, properly obtaining client consent to share data, monitoring the use of HMIS and reporting any breeches of security by agency staff and improper system use. Must be signed by the Executive Director with a WET (not digital) signature.

        iii. **Internal Client Grievance Policy** – Agencies must have a procedure in place for clients to make grievances when they believe their rights have been violated.

    b. User Agreements and Certifications – All OC HMIS Users must have the following forms on file with 211OC:

        i. **User Agreement** – Outlines the HMIS User's responsibilities in protecting client privacy and proper system use. Must be signed during the user's first log-in to HMIS.

VI. HMIS User Requirements

    a. HMIS Users must complete the following trainings:

        i. HMIS Part I Training – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures handbook. Users must submit the Policies and Procedures Acknowledgement Form in order to move on to the next training.

        ii. HMIS Part II Training – Covers HMIS functionality, HUD definitions, key terms, and data quality best practices. Users must submit a completed User Agreement in order to move on to the next training and receive their HMIS account information.

    b. HMIS Users must provide the following information and agreements in order to receive an HMIS account:

        i. The HMIS User's full name.

        ii. The HMIS User's *work* email. Personal emails will not be allowed. Shared email accounts are also not allowed.

iii. User Agreement.

iv. Policies and Procedures Acknowledgement Form.

VII. Agency Administrator Requirements

a. Agency Administrators (AA) must complete the following items before they can be certified as Agency Administrators:

   i. The agency's Executive Director must contact the HMIS Help Desk and provide the following information for the proposed Agency Administrator:

      1. Full name.

      2. *Work* email address. Personal emails will not be allowed. Shared email accounts are also not allowed.

      3. Work phone number.

   ii. Agency Administrator Training – Covers the responsibilities of the Agency Administrator, as well as training on HMIS functionality specific to Agency Administrators.

b. After certification, Agency Administrators are responsible for:

   i. Training their agency's staff as needed

      1. AA's should identify staff members who need access to HMIS and ensure they complete any required HMIS User trainings in a timely fashion.

      2. Agency Administrators are responsible for submitting the required Policies and Procedures Acknowledgement Form to the HMIS Help Desk on behalf of any new HMIS users at the agency.

      3. Agency Administrators are responsible for informing the HMIS Help Desk of HMIS Trainings completed by any users at the agency.

   ii. Serving as the primary technical support for their HMIS Users

      1. All HMIS User technical questions should be directed first to the Agency Administrator. If the Agency Administrator cannot solve the problem, they can then contact the HMIS Help Desk. HMIS Users who are not certified Agency Administrators are not allowed to contact the HMIS Help Desk. NOTE:

         a. The HMIS Help Desk strives to respond to all requests within three (3) business days. However, holidays, work load, and other events may delay responses. Agency Administrators are responsible for raising technical issues in a timely manner, keeping in mind that their request may not be solved same day.

         b. Agency Administrators should only submit tickets via the HMIS Help Desk. Emails sent to individual HMIS Staff members will receive a response directing the Agency Administrator to the HMIS Help Desk.

         c. Client identifying information should never be sent to the HMIS Help Desk. This includes but is not limited to: First Names, Last Names, Dates of Birth, or Social Security Numbers. AA's who repeatedly submit client identifying information to the HMIS Help Desk may be subject to corrective action.

iii. Notifying all members of their organization of any system-wide changes and other relevant information

1. Agency Administrators periodically receive emails from 211OC regarding HMIS. AA's are responsible for reading these emails and communicating the relevant information in them to their staff who are HMIS Users.
2. Agency Administrators should attend User Meetings which take place via webinar or in person. These webinars have replaced the Data Matters newsletter and are announced via direct email to all Agency Administrators and announced on ochmis.org.

iv. Notifying 211OC of all personnel changes

1. When an HMIS User no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, Agency Administrators must fill out a User Revocation of Access form and submit it to the HMIS Help Desk. This form cannot be backdated, meaning that the "Date Access should be Revoked" cannot be before the date the form is submitted to 211OC.
2. When an Agency Administrator no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, Executive Directors are required to submit the contact information of the replacement Agency Administrator via the HMIS Help Desk.

v. Monitoring compliance with standards of confidentiality and data collection, entry, and retrieval outlined in the OC HMIS Policies and Procedures

1. Inform your users that they are obligated to report suspected instances of noncompliance and/or security violations to the Agency Administrator as soon as possible.
2. Escalate any security violations that your agency's HMIS Users report to you to 211OC via the HMIS Help Desk.
3. Ensure that all staff at your agency is aware that HMIS usernames and passwords are NOT to be shared with anyone other than 211OC staff under any circumstance. HMIS Users should not share their HMIS login information with other staff at their agency, their Agency Administrator, their Executive Director, their IT Staff, etc.

vi. Ensuring that agency equipment meets the technical standards outlines on page 10 of this document.

vii. Ensuring that agency data quality either meets data quality thresholds for each relevant project type, or is on track to meet said thresholds.

1. Agency Administrators are required to be present at quarterly data quality meetings with a member of HMIS Staff. These meetings will discuss the latest report cards and identify areas for improvement. This time should also be used to ask for specialized help from the HMIS Staff.
2. Agency Administrators should be able to describe their agency's regular data quality monitoring procedure. For example, "We run x, y, and z reports each month. I identify data quality errors and fix them myself or delegate them to

Users x, y, and z." 211OC is happy to help develop an agency's data quality monitoring procedure.

VIII. Technical Standards

HMIS Participating Agencies must adhere to the following technical standards with regards to all technical equipment used to access HMIS. 211OC is not responsible for providing proper technical equipment or for providing IT services unrelated to HMIS.

    a. Minimum Hardware Requirements:
- i. Intel or AMD dual core processor (or newer) that supports SSE2.
- ii. 1GB of RAM.
- iii. 500MB of hard drive space.
- iv. An operating system (Windows or Mac) that is less than five years old.
- v. An internet connection.

    b. Minimum Software Requirements:
- i. A proper browser (Chrome, Firefox, Safari) that is updated to the most current version.
- ii. Each HMIS User must have their own login access to the computer terminal they use to access HMIS.
- iii. All screensavers must lock within 10 minutes of inactivity and point to the computer terminal login page upon subsequent activity.
- iv. All computers that are used to access HMIS OR share a network with computers that access HMIS must have virus protection software that has been updated within the last week.
- v. All computers that are used to access HMIS OR share a network with computers that access HMIS have a firewall.

    c. All computer terminals used to access HMIS (including organization network equipment) must be stored in a secure location.
- i. Ideally, this is a locked office area that is not accessible to the public. All computers used to access HMIS that are accessible to the public (front desk area, etc.) must be staffed at all times. When workstations are not in use and staff are not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals.

    d. The Executive Director or other empowered officer will be responsible for the maintenance and disposal of onsite computer equipment. This includes:
- i. Purchase of and upgrades to all existing and new computer equipment for utilization in the system.
- ii. Provision of computer terminals to all HMIS Users for accessing HMIS that have a unique username/password to log onto the operating system.

IX. Privacy

Visit the HMIS Documents page to view all HMIS Documents, which have been bolded below.

a. HMIS Accounts
    i. Passwords
        1. The HMIS vendor will enforce a password change for all HMIS accounts every 180 days.
        2. HMIS Users will never share passwords or HMIS accounts for any reason. The sharing of HMIS account passwords directly endangers the privacy of clients who entrust their personal identifying information to the OC HMIS and users found to be sharing HMIS account passwords will be subject to corrective action.
        3. After 30 minutes of inactivity in the OC HMIS, the system will automatically lock the user out and the user will need to enter their password again to return to HMIS.
        4. If a HMIS User attempts to log in four (4) times with an incorrect password, the HMIS will automatically lock their account. The user will be unable to access HMIS for two hours unless their Agency Administrator contacts the HMIS Helpdesk to unlock the account.
    ii. Access to HMIS
        1. As discussed in the Agency Administrator Responsibilities section, agency staff who no longer need access to HMIS will have their HMIS accounts locked. In the event that an HMIS account is not locked due to Agency Administrator oversight (by not submitting a Revocation of Access form) or for any other reason, the former HMIS User is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave their HMIS participating agency.
        2. 211OC reserves the right to lock the account of an HMIS User if the user does not complete required trainings, whether they be the original two (2) required trainings that all HMIS Users must take or future required trainings such as training on updates to the HUD Data Standards, and unlock the account once the required trainings have been completed.
        3. If an HMIS User does not log into HMIS for 180 days, the HMIS account will be locked automatically. The user will receive a notification two (2) calendar days prior to the account being locked. If an account is locked due to inactivity, the user will be required to complete the required HMIS Part 1 and HMIS Part 2 trainings, as well as any other trainings required by 211OC, to regain access to HMIS.
b. HMIS Data
    i. Participating Agencies
        1. All HMIS Users are required to ensure that client identifying information is never sent across an unencrypted network, saved in an unprotected folder on a computer, or, in the case of hard copies of client identifying information, stored anywhere other than a locked file cabinet or office.
        2. Client Identifying Information CANNOT be sent over email either between a participating agency and 211OC or between staff at a participating agency.

The only permissible way to discuss an individual client over email is using the client's ID number.

3. In the event that client identifying information must be sent over email, it must be contained in an Excel or Word document that has been protected with a password. Passwords to such files CANNOT be sent over email and can only be communicated in person or over the telephone.

ii. HMIS Vendor

1. The HMIS vendor stores client information and all other HMIS data in an encrypted centralized database. This data can only be decrypted after 211OC collects written permission from each participating agency's Executive Director.

2. The vendor's designated hosting company will perform data backup procedures in the following manner:

    a. Daily
   - i. Full SQL database dumps
   - ii. Full data (files) backups
   - iii. Incremental VM (bare metal) backups
   - iv. "Second copy" incremental VM (bare metal) backups are performed to a second device

    b. Weekly
   - i. Full VM (bare metal) backups
   - ii. "Second copy" full VM (bare metal) backups are performed to a second device
   - iii. Full SQL database dumps are sent via a secured connection to Amazon Web Services offsite storage and encrypted at rest
   - iv. Full Data (files) backups are sent via a secured connection to
   - v. Amazon Web Services offsite storage and encrypted at rest

iii. Computers that Access HMIS

1. Must have virus protection software that performs scans daily and automatically updates to the most current version.

2. Must have a firewall in place between any computer and internet connection for the entire network, be protected with at minimum Wired Equivalent Privacy (WEP), use Network Address Translation (NAT), and maintain the most recent virus security updates.

iv. Agency Audits

1. 211OC will audit all HMIS Participating Agencies on a yearly basis, regardless of funding source.

2. 211OC will attach the audit checklist to the scheduling email sent to the Agency Administrator one (1) month prior to the audit.

3. Agencies are expected to be prepared to cover every item on the audit form on the day the audit is scheduled. An Agency Administrator must be present, and all computer terminal passwords must be available for the security check.

4. Agencies and 211OC can request to reschedule the Agency Audit up to one (1) business day before the audit is scheduled. Requests to reschedule or cancellations that occur after that window has passed may be subject to corrective action.

5. If any deficiencies are found in the audit, the agency and the 211OC staff person will agree upon a date that the issue should be resolved by. If the corrections are not made by the agreed upon date, the agency will be subject to corrective action.

v. Client Privacy

1. In order for client records to be shared in HMIS, clients must sign the **Client Consent to Share Protected Personal Information form**, either digitally in HMIS or physically on a printed form that is to be stored with any other physical client files, at project entry for each project enrollment.
    a. Agency staff must explain the form to clients in person and how their information is used and viewed.
    b. This form must be stored with each client's physical file or the client can e-sign the form in HMIS. If the client signs a paper form, a signed copy of the form must be uploaded to the client's HMIS record.

2. If clients refuse to sign the **Client Consent to Share Protected Personal Information form** they cannot be pressured into signing the form or denied services on the basis of their refusal to sign. Follow the procedure outlined in HMIS Part II Training for entering client information into HMIS when clients refuse to sign the Client Consent to Share Protected Personal Information form. Refusal to sign the consent form means that all of that client's data is only visible by the agency serving the client.

3. Upon signing the **Client Consent to Share Protected Personal Information form** clients must be made aware of their right to revoke their consent to share protected information at any time.
    a. Participating agencies must have copies of the **Revocation of Consent form** available in areas accessible to clients at all times. Clients should NOT have to request this form from participating agency staff.
    b. If a client submits a **Revocation of Consent form**, participating agency staff must follow the most current procedure for "unsharring" the client's protected personal information in HMIS. [Update when KB article is published]

4. Participating agencies must post the **Note Regarding Collection of Personal Information** in all areas where HMIS data entry occurs. Participating agencies should direct outreach teams to give a copy of the Note to each outreach worker.

5. Participating agencies must post the **Privacy Notice** on their website.

6. Participating agencies must have an Interagency Data Sharing Consent Form on file as discussed in Agreements and Certifications section.

7. Clients may inspect and obtain a copy of their client information. The participating agency, as the custodian of the client's data, has the

responsibility to provide the client with the requested information within five (5) business days except where exempted by state and federal law.

    a. Agency Administrators are required to review clients' HMIS data with them upon request of HMIS data.

    b. No client shall have access to another client's data for any reason, except for parents or guardians of a minor requesting their minor child's records.

8. Participating agencies must have copies of the **HMIS Client Grievance form** available in areas accessible to clients at all times in the event of an HMIS related grievance. Clients should NOT have to request this form from participating agency staff.

    a. In the event that the participating agency's in house grievance policy was not able to resolve the grievance, clients will submit the grievance form directly to 211OC.

9. Participating agencies may not, under any circumstance, use unencrypted communication methods (including but not limited to email, fax, instant messaging services, and text messaging) to send any client identifying information including but not limited to First Names, Last Names, Social Security Numbers, and Dates of Birth.

    a. Agencies must have a formal policy for intra-agency communication regarding clients that protects client privacy. Ideally, agency staff should only use the client ID provided by the OC HMIS when using unencrypted communication methods to discuss clients.

X. Data Use and Disclosure

a. 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 organization. Disclosures involve sharing parts of client information with persons or organizations outside an organization.

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

c. The vendor and any authorized subcontractor shall not use or disclose data stored in the OC 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 each Continuum and vendor contain language that prohibits access to the data stored in the software except under the conditions noted above.

XI. Data Release

a. 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.

b. No identifiable client data will be released by 211OC or any Participating Organizations to any person, agency, or organization not participating in HMIS for any purpose without written permission from the client, with the exception of subpoenas or other circumstances as required by law. If the data is being released to an entity participating in HMIS, they will only be able to access client identifiable information if the client has signed the **Client Consent to Share Protected Personal Information form**.

c. Each Participating Organization owns their own data that is stored in the system. The organization may not release personal identifiable client data without written permission from the client. Organizations may release program and/or aggregate level data for all clients to whom the organization provided services.

d. The Orange County CoC may release aggregate data about its own continuum at the program, sub-regional, and regional level. Aggregate data may be released without organization permission at the discretion of the Continuum.

e. Requests for regional or sub-regional data must be reviewed and approved by the CoC Board prior to the data being released if the request meets any of the criteria below. If the request is pre-approved below, the CoC Board will receive a copy of the data that is released.

Data Request Criteria	HMIS Participating Agency		Entity Does not Participate in HMIS		CoC Board Sub-Committee	
	Approved	Needs Approval	Approved	Needs Approval	Approved	Needs Approval
Aggregate system level data	X			X	X	
De-identified client level data		X		X	X	
Ongoing data requests	X			X		X
For use as research		X		X	X	
For media release		X		X		X
For other public use		X		X		X

    i. Data Requests are to be provided to 211OC via the HMIS Helpdesk and must be submitted using the Data Request Form, which includes the information below.

        1. Requestor's Name

        2. Requestor's Organization

        3. Description of the data needed, including reporting period and specific data elements

        4. Description of what the data will be used for (research, media use, etc)

5. Will this data be published? If yes, where?
6. When is the data needed by?
7. How often is this data needed?

XII.   HMIS Data Quality Plan

Visit the HMIS Documents page to view all HMIS Documents, which have been bolded below.

a. Agency and Project Set Up
   i. Agencies should notify the HMIS Helpdesk when they would like any of their projects to start participation in the OC HMIS. 211OC reserves the right to deny access to projects that do not serve homeless clients. Projects whose performance or data quality negatively impacts the CoC as a whole may be subject to corrective action.
   ii. Police Departments wishing to participate in HMIS must be approved by the CoC Board prior to being given access, unless the police department is receiving federal funding and is required to participate in HMIS.
      1. Any police departments participating in HMIS will not be able to see a client's historical enrollments at any other agency.
   iii. Agency Administrators are required to submit a **Project Close Out Form** when projects are no longer active. 211OC HMIS staff will deactivate the project so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS for reporting purposes.
b. Data Quality
   i. Agencies must collect all relevant Universal and Program Specific Data Elements depending on project type and funding source at the following applicable collection points:
      1. Record Creation
      2. Project Entry
      3. Update
      4. Annual Assessment
      5. Project Exit
   ii. All data entered into the OC HMIS must meet applicable Data Quality standards based on project type as outlined in the table below:

Project Type	UDE and Entry	Exit
PSH and OPH	95%	95%
Homeless Prevention	95%	95%
Rapid Re-Housing	95%	95%
Transitional Housing	95%	95%
Emergency Shelter	90%	65%
Street Outreach	85%	50%
Services Only	85%	50%

iii. Client data must be entered into the OC HMIS within three (3) calendar days. This expectation applies to all collection points listed in section [IX, b, i, 1-5] except Annual Assessments, for which data can be collected and entered into the OC HMIS thirty (30) days before or after the client's one year project entry anniversary.

iv. Agencies must have a process in place to ensure clients' First and Last Names are spelled correctly and that Dates of Birth are properly verified.
   1. Agencies must request a client's identification to ensure First and Last Names are spelled correctly and that the correct DOB is entered into HMIS.
   2. If no ID is available, staff must request that clients verify the spelling of their First and Last Name. Staff must not assume they know the correct spelling of clients' names.

v. Income and non-cash benefits must be updated at least annually and at exit, or at the frequency specified by program requirements. Income and non-cash benefits must also be updated via Status Update whenever a client experiences a change in the amount, frequency, source, or any other change in income or non-cash benefits.
   1. Annual Reviews will be completed in the 30 days prior to the anniversary of the client's entry into the project.

vi. Agencies must have a coherent entry process that is consistent among all staff members and projects.
   1. For clients that were previously served by a project participating in HMIS, this includes reviewing any intake or entry data that was previously captured, and updating this information to reflect the client's information as of entry into your agency's project.

vii. Agencies must have a coherent exit process that is consistent among all staff members and projects.
   1. Program Specific Data Elements at exit must be collected from all clients at Project Exit regardless of whether or not the client has "successfully" completed the program, unless clients disappear from the project or are deceased.
   2. Clients and staff must be educated on the importance of planning and communicating regarding project exit. This should be evidenced through staff meeting minutes or online training logs and records.

viii. Agency Administrators must have a coherent process for monitoring their agency's data quality.
   1. Report frequency should reflect the volume of data entered into the OC HMIS. Frequency for funded projects will be governed by Grant Agreements, HUD reporting cycles, and local CoC Standards. However, higher turnover projects such as emergency shelters and services only projects must review and correct data at least monthly. While 211OC highly recommends that all agencies review their data on a monthly basis, lower turnover projects such as Transitional and Permanent Housing must run reports following all intakes and exits, and on a quarterly basis to monitor the recording of services and other required data elements including annual updates of income and employment.

      ix. Agencies are required to review Project Performance Reports/System Performance Measures reports defined by HUD and other funding organizations. Measures are based on Project Type. The HMIS Lead Agency, in collaboration with the CoC Board, County, and other stakeholders establish local benchmark targets for performance improvement on shared measures.

          1. Agencies should review the Project Performance Report and Data Quality Report Cards in preparation for mandatory quarterly Data Quality review meetings with members of HMIS staff.