Rock River Homeless Coalition HMIS

Policies and Procedures

Rock River Homeless Coalition

And

Institute for Community Alliances

2018

Contents

[1. Introduction 3](#_Toc474832206)

[1.1 HMIS BENEFITS 3](#_Toc474832207)

[2. Requirements for Participation 5](#_Toc474832208)

[2.1 RESPONSIBILITIES OF HMIS USERS 5](#_Toc474832209)

[2.2 PARTNER AGENCY REQUIREMENTS 5](#_Toc474832210)

[2.4 USER TRAINING REQUIREMENTS 7](#_Toc474832211)

[2.5 HMIS USER LEVELS 8](#_Toc474832212)

[2.6 HMIS VENDOR REQUIREMENTS 9](#_Toc474832213)

[2.7 MINIMUM TECHNICAL STANDARDS 10](#_Toc474832214)

[2.8 HMIS LICENSE FEES 11](#_Toc474832215)

[2.9 HMIS OPERATING POLICIES VIOLATION 11](#_Toc474832216)

[3. Privacy and Security 13](#_Toc474832217)

[3.1 DATA ASSESSMENT AND ACCESS 13](#_Toc474832218)

[3.2 DATA REPORTING PARAMETERS AND GUIDELINES 14](#_Toc474832219)

[3.3 RELEASE OF DATA FOR GRANT FUNDERS 15](#_Toc474832220)

[3.4 BASELINE PRIVACY POLICY 15](#_Toc474832221)

[3.5 USE OF A COMPARABLE DATABASE BY VICTIM SERVICE PROVIDERS 18](#_Toc474832222)

[3.6 USER CONFLICT OF INTEREST 19](#_Toc474832223)

[3.7 SECURITY PROCEDURE TRAINING FOR USERS 19](#_Toc474832224)

[3.8 VIOLATION OF SECURITY PROCEDURES 19](#_Toc474832225)

[3.9 PROCEDURE FOR REPORTING SECURITY INCIDENTS 19](#_Toc474832226)

[3.10 DISASTER RECOVERY PLAN 20](#_Toc474832227)

[4. Data Requirements 22](#_Toc474832228)

[4.1 MINIMUM DATA COLLECTION STANDARD 22](#_Toc474832229)

[4.2 PROVIDER NAMING CONVENTION 22](#_Toc474832230)

[4.3 DATA QUALITY PLAN 22](#_Toc474832231)

[4.4 DATA IMPORTS 22](#_Toc474832232)

[4.5 HMIS DATA PROTECTION 23](#_Toc474832233)

[5. Glossary 24](#_Toc474832234)

[6. Appendix 1: Data Dictionary and Data Manual 26](#_Toc474832235)

[7. Appendix 2: Data Quality Plan 27](#_Toc474832236)

[7.1 GOALS OF THE DATA QUALITY PLAN 27](#_Toc474832237)

[7.2 DATA QUALITY PLAN AND RESPONSIBILITIES 27](#_Toc474832238)

[7.3 DATA COMPLETENESS 28](#_Toc474832239)

[7.4 DATA COMPLETENESS STANDARDS 29](#_Toc474832240)

[7.5 DATA CONSISTENCY 29](#_Toc474832241)

[7.6 DATA ACCURACY 30](#_Toc474832242)

[7.7 DATA ACCURACY STANDARD 31](#_Toc474832243)

[7.8 BED/UNIT UTILIZATION RATES 32](#_Toc474832244)

[7.9 MONITORING PLAN 32](#_Toc474832245)

[7.10 DATA QUALITY PLAN ENFORCEMENT 33](#_Toc474832246)

# 1. Introduction

The Rock River Homeless Management Information System (HMIS) is the designated database of the Rock River Homeless Coalition. The HMIS is an internet-based database that is used by homeless service organizations in the Rock River Homeless Coalition to record and store client-level information about the numbers, characteristics and needs of homeless persons and those at risk of homelessness. Mediware administers the central server and the HMIS software, and ICA administers user and agency licensing, training and compliance.

The HMIS enables service providers to measure the effectiveness of their interventions and facilitate longitudinal analysis of service needs and gaps within the Continuum of Care. Information that is gathered from consumers via interviews conducted by service providers is analyzed for an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives. Data aggregated from the HMIS about the extent and nature of homelessness in the Rock River Homeless Coalition is used to inform public policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

Guidance for the implementation of Rock River Homeless Coalition’s HMIS is provided by the coalition’s HMIS Governance Committee that is committed to understanding the gaps in services to consumers of the human service delivery system in an attempt to end homelessness.

This document provides the policies, procedures, guidelines and standards that govern the HMIS operations, as well as the responsibilities for Agency Administrators and end users.

## 1.1 HMIS BENEFITS

Use of the HMIS provides numerous benefits for service providers, homeless persons, and the Rock River Homeless Coalition.

Benefits for service providers

* Provides online real-time information about client needs and the services available for homeless persons.
* Assures confidentiality by providing information in a secured system.
* Decreases duplicative client intakes and assessments.
* Tracks client outcomes and provides a client history.
* Generates data reports for local use and for state and federal reporting requirements.
* Facilitates the coordination of services within an organization and with other agencies and programs.
* Provides access to a statewide database of service providers, allowing agency staff to easily select a referral agency.
* Increased abilityto define and understand the extent of homelessness throughout Rock River Homeless Coalition.
* Increased ability to focus staff and financial resources where services for homeless persons are needed the most.
* Increased ability to evaluate the effectiveness of specific interventions and programs, and services provided.

Benefits for persons experiencing homelessness

* Intake information and needs assessments are maintained historically, reducing the number of times homeless persons must repeat their stories to multiple service providers.
* The opportunity to provide intake and life history one time demonstrates that service providers consider the homeless person’s time valuable and restores some of the consumer’s dignity.
* Multiple services can be easily coordinated, and referrals streamlined.
* Increased data collection may increase area funding, producing increased service availability to clients

# 2. Requirements for Participation

## 2.1 RESPONSIBILITIES OF the HMIS USERS

Designated Agency HMIS Contact

1. Provide updated agency information to ICA for update in the HMIS.
2. Ensure that the participating agency obtains a unique user license for each user at the agency.
3. Establish the standard report for each specific program created.
4. Maintain a minimum standard of data quality by ensuring the Universal Data Elements are complete and accurate for every individual served by the agency and entered into the HMIS.
5. Maintain the required universal data elements and program specific data elements for each program in accordance with the most recently released HMIS Data Standards and maintain data elements required by the HMIS Governance Committee and/or the CoC in which the program operates.
6. Ensure agency staff persons receive required HMIS training, and review the Rock River HMIS Policies and Procedures, the Agency Partnership Agreement and any agency policies which impact the security and integrity of client information.
7. Ensure that HMIS access is granted only to staff members that have received training, have completed the Rock River HMIS User Agreement and are authorized to use the HMIS.
8. Notify all users at their agency of interruptions in service.
9. Provide a single point of communication between users and the HMIS staff at the Institute for Community Alliances.
10. Administer and monitor data security policies and standards, including:
* User access control;
* The backup and recovery of data; and
* Detecting and responding to violations of the policies and procedures or agency procedures.

Users

1. Take appropriate measures to prevent unauthorized data disclosure.
2. Report any security violations.
3. Comply with relevant policies and procedures.
4. Input required data fields accurately within 5 calendar days.
5. Ensure a minimum standard of data quality by accurately answering the Universal Data Elements and required program specific data elements for every individual entered into the HMIS.
6. Inform clients about the agency’s use of the HMIS and secure the release of information needed for sharing client data.
7. Take responsibility for any actions undertaken with one’s username and password.
8. Complete required training.
9. Read any communications from the coalition or the HMIS lead pertaining to the HMIS information.

##  2.2 PARTNER AGENCY REQUIREMENTS

Participation Agreement Documents

Partner Agencies must complete the following documents:

1. **Partnership Agreements** must be signed by each participating agency’s executive director. The Institute for Community Alliances will retain the original document. The participation agreement states the agency’s commitment to adhere to the policies and procedures for effective use of the HMIS.
2. **The Rock River HMIS User Agreements** list userpolicies and responsibilities and are electronically signed by each authorized user. An electronic or hard copy of the original document must be kept by the originating agency.
3. **Coordinated Services Agreements** allow the specifically named HMIS user to enter client data as, or on behalf of, another specifically named Participating Agency and/or to report on behalf the specifically named Participating Agency. The signed agreement will be maintained by the HMIS Lead Agency, the Institute for Community Alliances.

User Access to the System

The Designated Agency HMIS Contact will determine user access for users at or below the Case Manager III access level and assign users to the appropriate agency provider. The System Administrator will generate usernames and passwords within the administrative function of the software.

The Designated Agency HMIS Contact and all users must complete training before access to the system is granted by ICA.

User Requirements

Users must be paid staff or official volunteers of a Partner Agency. An official volunteer must complete a volunteer application with the Partner Agency, undergo agency training, pass a criminal background check, and record volunteer hours with the agency. Individuals who are solely contracting with a Partner Agency are prohibited from receiving a user license. All users must be at least 18 years old.

Users who are also Clients Listed in the HMIS

In order to prevent users from editing their own file or files of immediate family members, all users will agree to a conflict of interest statement that is part of the User Agreement. Users must disclose any potential conflict of interest to their Agency Administrator. Users will be prohibited from making changes to the information in their own file or the files of their immediate family members. If a user is suspected of violating this agreement, the System Administrator will run the audit trail report to determine if there was an infraction.

Passwords

* Creation: Passwords are automatically generated from the system when a user is created. The Designated Agency HMIS Contact will communicate the system-generated password to the user.
* Use: The user will be required to change the password the first time they log onto the system. The password must be at least 8 characters and alphanumeric. Passwords should not be able to be easily guessed or found in a dictionary. Passwords are the individual’s responsibility and users cannot share passwords. Users shall not keep written copies of their password in a publicly accessible location.
* Storage: Any passwords that are written down are to be stored securely and must be inaccessible to other persons. Users are not to store passwords on a personal computer for easier log on.
* Expiration: Passwords expire every 45 days. Users may not use the same password consecutively. Passwords cannot be re-used until two password selections have expired.
* Unsuccessful logon: If a user unsuccessfully attempts to log-on three times, the User ID will be “locked out,” and access permission will be revoked rendering the user unable to gain access until his/her password is reset.

Inputting Data

Agencies participating in the HMIS must meet the minimum data entry requirements established by the most recent HMIS Data Standards.

Tracking of Unauthorized Access

Any suspicion of unauthorized activity should be reported to the Institute for Community Alliances HMIS staff.

Designated Agency HMIS Contact

The Designated Agency HMIS Contact will be responsible for monitoring the HMIS access by users at their agency. This person will also be responsible for ensuring new agency staff persons are trained on how to use the HMIS by the System Administrators and for ensuring that new staff are aware of any agency or program specific data entry requirements.

The Designated Agency HMIS Contact must identify the assessments and requirements for each program, and work with the System Administrators to properly set up each program in the HMIS.

Client Release of Information (ROI)

In addition to posting the HMIS Consumer Notice, agencies must obtain client consent prior to sharing client data with other agencies when data sharing is appropriate for client service delivery. Agencies are required to ensure clients know what data are being collected about them, and be given the opportunity to make choices about what personal and program related information is shared in the HMIS and with whom that data is shared. Agencies may use the [Client Release of Information](http://static1.squarespace.com/static/54ca7491e4b000c4d5583d9c/t/56ce3161e707ebf11d411696/1456353634168/Client%2BRelease%2Bof%2BInformation_11.20.15.pdf) form on the ICA website, or use their own form that includes language commensurate with the ICA ROI. The form requires clients to authorize the electronic sharing of their personal information, and allows for clients to have more control over their own information. Agencies are required to obtain client consent at each level listed on the form. Clients have the right to refuse any level of shared data.

Data Protocols

Agencies may collect information for data elements in addition to the minimally required data elements established by the HMIS Governance Committee in accordance with HUD. Agencies must maintain consistency with data collection and entry within each program.

## 2.4 USER TRAINING REQUIREMENTS

New User Training Requirements

All users are required to attend new user training with ICA prior to receiving access to the system. If ICA determines that data entered by a current end user does not meet minimum data quality standards, users may be required to repeat this training.

Once a new user begins the HMIS new user training series, the user has 15 days to complete the training series and all required assignments. ICA staff will review the user’s homework and determine if corrections are needed. Users will have an additional 15 days to make all corrections. If the user fails to complete all requirements within 30 days, the user will need to retake the training series. ICA staff may determine that a new user failed to grasp the necessary data entry concepts based on the quality of the user’s homework. ICA staff may use their discretion to require new users to repeat new user training. If a new user fails to successfully complete the homework requirements for data entry after repeated attempts, ICA staff may use their discretion to determine that the new user is not capable of accurate and complete data entry, and may refuse to issue the new user a Rock River HMIS user license.

ICA has sole discretion to waive the requirement to attend new user training regarding persons with previous HMIS experience. ICA will consider the user’s familiarity with the HMIS and the need for the user to learn about potential system updates and changes during new user training when making its decision to waive the new user training requirement.

Users are expected to fully participate in all trainings attended. If a user misses more than ten minutes or ten percent (whichever is greater) of a training, the user will not receive credit for completing the training.

Ongoing User Training Requirements

All users are required to participate in the annual security training to retain their user license.

## 2.5 HMIS USER LEVELS

The HMIS user roles are listed on the ICA website.

Resource Specialist I

Users at this level may access only the ResourcePoint module. Users may search the database of area agencies and programs, and view the agency or program detail screens. A Resource Specialist I cannot modify or delete data, and does not have access to client or service records or other modules and screens.

Resource Specialist II

Users may access only the ResourcePoint module. Users may search the database of area agencies and programs, and view the agency or program detail screens. At this level, the user does not have access to client or service records or other modules and screens. A Resource Specialist II is an agency-level “Information & Referral (I&R) specialist” who may update their own agency and program information.

Resource Specialist III

Users at this level may access only the ResourcePoint module. Users may search the database of area agencies and programs and view the agency or program detail screens. A Resource Specialist III may add or remove resource groups, including Global (which they get by default). Access to client or service records and other modules and screens is not given. A Resource Specialist III may edit the system-wide news feature.

Volunteer

Users may access ResourcePoint, and have limited access to ClientPoint and service records. A volunteer may view or edit basic demographic information about clients (the profile screen), but is restricted from all other screens in ClientPoint. A volunteer may also enter new clients, make referrals, and check clients in/out from a shelter. A volunteer does not have access to the “Services Provided” tab. This access level is designed to allow a volunteer to perform basic intake steps with a new client and then refer the client to an agency staff member or case manager.

Agency Staff

Users may access ResourcePoint, have full access to service records, and limited access to ClientPoint. Agency staff may access most functions in ServicePoint, however, they may only access basic demographic data on clients (profile screen). All other screens are restricted including Reports. Agency Staff can add news items to the newswire feature.

Case Manager I

Users may access all screens and modules except “Administration.” A Case Manager I may access all screens within ClientPoint, except the medical screen for confidentiality reasons. Users may access Reports.

Case Manager II

Users may access all screens and modules except “Administration.” A Case Manager II may access all screens within ClientPoint, including the medical screen. Users may access Reports.

Case Manager III

This role has the same actions available as the Case Manager II with the added ability to see program data for all providers on their provider tree, like an Agency Administrator.

Designated Agency HMIS Contact

Users may access all ServicePoint screens and modules. Agency Administrators may add/remove users and edit agency and program data for all providers on their provider tree.

Executive Director

Users have the same access rights as an Agency Administrator, but rank above the Agency Administrator.

System Operator

Users may only access Administration screens. System operators can create new agency providers, add new users, reset passwords, and access other system-level options. Users may order additional user licenses and modify the allocation of licenses. They maintain the system, but may not access any client or service records.

System Administrator I

Users have the same access rights to client information as Agency Administrators, but for all agencies in the system. System Administrators also have full access to administrative functions.

System Administrator II

There are no system restrictions on users. They have full HMIS access.

## 2.6 The HMIS VENDOR REQUIREMENTS

Physical Security

Access to areas containing the HMIS equipment, data and software will be secured.

Firewall Protection

The vendor will secure the perimeter of its network using technology from firewall vendors. Company system administrators monitor firewall logs to determine unusual patterns and possible system vulnerabilities.

User Authentication

Users may only access the HMIS with a valid username and password combination that is encrypted via SSL for internet transmission to prevent theft. If a user enters an invalid password three consecutive times, they are automatically shut out of that HMIS session. For added security, the session key is automatically scrambled and re-established in the background at regular intervals.

Application Security

The HMIS users will be assigned a system access level that restricts their access to appropriate data.

Database Security

Wherever possible, all database access is controlled at the operating system and database connection level for additional security. Access to production databases is limited to a minimal number of points; as with production servers, production databases do not share a master password database.

Technical Support

The vendor will assist the ICA HMIS staff to resolve software problems, make necessary modifications for special programming, and will explain system functionality to ICA.

Technical Performance

The vendor maintains the system, including data backup, data retrieval and server functionality/operation. Upgrades to the system software will be continuously developed and implemented.

Hardware Disposal

Data stored on broken equipment or equipment intended for disposal will be destroyed using industry standard procedures.

##  2.7 MINIMUM TECHNICAL STANDARDS

Minimum Computer Requirements

* A PC with a 2 Gigahertz or higher processor, 40GB hard drive, 512 MB RAM, and Microsoft Windows 7 or 8
* The most recent version of Google Chrome, Safari or Firefox. No additional plug-in is required.

It is recommended that your browser have a 128 cipher / encryption strength installed. The browser’s cache should be set to “Check for new version of the stored pages: Every visit to page.”

* A high speed broadband Internet connection is required.
* Virus protection updates
* The only mobile device that is officially supported by Mediware is the Apple iPad running the latest version of iOS.

Additional Recommendations

Memory

* + Windows 7: 4Gig recommended (2 Gig minimum)

Monitor

* + Screen Display: 1024x768 (XGA) or higher; 1280x768 strongly advised

Processor

* + A Dual-Core processor is recommended

## 2.8 HMIS LICENSE FEES

Annual Rock River HMIS License Fees

License fees are based upon grant contracts received by the HMIS Lead. The HMIS Lead reserves the right to charge license fees if adequate grant funds are not available.

## 2.9 HMIS OPERATING POLICIES VIOLATION

The HMIS users and Partner Agencies must abide by all the HMIS operational policies and procedures found in the HMIS Policies and Procedures manual, the Rock River HMIS User Agreement, and the Partner Agency Agreement. Repercussion for any violation will be assessed in a tiered manner. Each user or Partner Agency violation will face successive consequences – the violations do not need to be of the same type in order to be considered second or third violations. User violations do not expire. No regard is given to the duration of time that occurs between successive violations of the HMIS operation policies and procedures as it relates to corrective action.

* + First Violation – the user and Partner Agency will be notified of the violation in writing by ICA. The user’s license will be suspended for 30 days, or until the Partner Agency notifies ICA of action taken to remedy the violation. ICA will provide necessary training to the user and/or Partner Agency to ensure the violation does not continue. ICA will notify the HMIS Governance Committee of the violation during the next scheduled Governance Committee meeting following the violation.
	+ Second Violation – the user and Partner Agency will be notified of the violation in writing by ICA. The user’s license will be suspended for 30 days. The user and/or Partner Agency must take action to remedy the violation; however, this action will not shorten the length of the license suspension. If the violation has not been remedied by the end of the 30-day user license suspension, the suspension will continue until the Partner Agency notifies ICA of the action taken to remedy the violation. ICA will provide necessary training to the user and/or Partner Agency to ensure the violation does not continue. ICA will notify the HMIS Governance Committee of the violation during the next scheduled Governance Committee meeting following the violation.
	+ Third Violation – the user and Partner Agency will be notified of the violation in writing by ICA. ICA will notify the HMIS Governance Committee of the violation and convene a review panel made up of Governance Committee members who will determine if the user’s license should be terminated. The user’s license will be suspended for a minimum of 30 days, or until the Governance Committee review panel notifies ICA of their determination, whichever occurs later. If the Governance Committee determines the user should retain their user license, ICA will provide necessary training to the user and/or Partner Agency to ensure the violation does not continue. If users who retain their license after their third violation have an additional violation, that violation will be reviewed by the Governance Committee review panel.

In the event a Partner Agency has paid a fee for the use of the HMIS, the fee will not be returned if a user or Partner Agency’s access to the HMIS is revoked.

Notifying the HMIS Lead Agency of a Violation

It is the responsibility of the Designated Agency HMIS Contactor general User at Partner Agencies that do not have a Designated Agency HMIS Contact to notify the HMIS Lead Agency when they suspect that a User or Partner Agency has violated any HMIS operational agreement, policy or procedure. A complaint about a potential violation must include the User and Partner Agency name, and a description of the violation, including the date or timeframe of the suspected violation. Complaints should be sent in writing to the HMIS Lead Agency (ICA) at rrhmis@icalliances.org. The name of the person making the complaint will not be released from the HMIS Lead Agency if the individual wishes to remain anonymous.

Violations of Local, State or Federal Law

Any Partner Agency or user violation of local, state or federal law will immediately be subject to the consequences listed under the Third Violation above.

Multiple Violations within a 12-Month Timeframe

During a 12 month calendar year, if there are multiple users (3 or more) with multiple violations (2 or more) from one Partner Agency, the Partner Agency as a whole will be subject to the consequences listed under the Third Violation above.

# 3. Privacy and Security

The importance of the integrity and security of the HMIS cannot be overstated. Given this importance, HMIS must be administered and operated under high standards of data privacy and security. The Institute for Community Alliances and Partner Agencies are jointly responsible for ensuring that the HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission and destruction of data, comply with the HMIS privacy, security and confidentiality policies and procedures. When a privacy or security standard conflicts with other Federal, state and local laws to which the Partner Agency must adhere, the Partner Agency must contact ICA to collaboratively update the applicable policies for the partner agency to accurately reflect the additional protections.

## 3.1 DATA ASSESSMENT AND ACCESS

All the HMIS data will be handled according to the following major classifications: Shared or Closed Data. The HMIS staff will assess all data, and implement appropriate controls to ensure that data classified as shared or closed are handled according to the following procedures.

Shared Data

Shared data is unrestricted information that has been entered by one provider and is visible to other providers using the HMIS. The Rock River Homeless Coalition’s HMIS is designed as an open system that defaults to allow shared data. Providers have the option of changing their program settings to keep client data closed.

Data that is Not Shared

Information entered by one provider that is not visible to other providers using the HMIS. Programs that serve individuals with HIV/AIDS, unaccompanied minors, or provide legal services must enter closed data. Further, programs that provide legal services may enter clients as “unnamed.” Individual client records can be closed at the client’s request.

Procedures for transmission and storage of data

* Open Data: This is data that does not contain personal identifying information. The data should be handled discretely, unless it is further classified as Public Data. The data must be stored out of site, and may be transmitted via internal or first-class mail until it is considered public data.
* Confidential Data at the Agency Level: Confidential data contains personal identifying information. Each agency shall develop rules governing the access of confidential data in the HMIS to ensure that those staff needing confidential data access will have access, and access is otherwise restricted. The agency rules shall also cover the destruction of paper and electronic data in a manner that will ensure that privacy is maintained and that proper controls are in place for any hard copy and electronic data that is based on the HMIS data.

Whenever confidential data is accessed:

* Hard copies shall be shredded when disposal is appropriate. Hard copies shall be stored in a secure environment that is inaccessible to the general public or staff not requiring access.
* Hard copies shall not be left out in the open or unattended.
* Electronic copies shall be stored only where the employee can access the data.
* Electronic copies shall be stored where a password is required to access the data if on shared server space.

All public data must be classified as aggregated public or unpublished restricted access data.

Aggregated Public Data

Information published according to the “Reporting Parameters and Guidelines” (the HMIS Policies and Procedures Section 3.2).

Unpublished Restricted Access Data

Information scheduled, but not yet approved, for publication. Examples include draft reports, fragments of data sets, and data without context or data that have not been analyzed.

Procedures for Transmission and Storage of Data

* Aggregated Public Data: Security controls are not required.
* Unpublished Restricted Access Data:
	1. Draft or Fragmented Data – Accessible only to authorized the HMIS staff and agency personnel. Requires auditing of access and must be stored in a secure out-of-sight location. Data can be transmitted via e-mail, internal departmental or first class mail. If mailed, data must be labeled confidential.
	2. Confidential Data: Requires encryption at all times. Must be magnetically overwritten and destroyed. Hard copies of data must be stored in an out-of-sight secure location.

## 3.2 DATA REPORTING PARAMETERS AND GUIDELINES

All open data will be handled according to the following classifications - *Public Data*, *Internal Data, and Restricted Data* - and should be handled according to the following procedures.

Principles for Release of Data

* Only de-identified aggregated data will be released except as specified below.
* No identified client data may be released without informed consent unless otherwise specified by Illinois State and Federal confidentiality laws. All requests for such information must be addressed to the owner/participating agency where the data was collected.
* Program specific information used for annual grant program reports and program specific information included in grant applications is classified as public information. No other program specific information will be released without written consent.
* There will be full access to aggregate data included in published reports.
* Reports of aggregate data may be made directly available to the public.
* The parameters of the aggregated data, that is, where the data comes from and what it includes will be presented with each report.
* Data will be mined for agencies requesting reports on a case-by-case basis.
* Requests must be written with a description of specific data to be included and for what duration of time. Requests are to be submitted at least 30 days prior to the date the report is needed. Exceptions to the 30-day notice may be made.
* ICA reserves the right to deny any request for aggregated data.

## 3.3 RELEASE OF DATA FOR GRANT FUNDERS

Entities providing funding to agencies or programs required to use the HMIS will not have automatic access to the HMIS. Access to the HMIS will only be granted by ICA when there is a voluntary written agreement in place between the funding entity and the agency or program. Funding for any agency or program using the HMIS cannot be contingent upon establishing a voluntary written agreement allowing the funder HMIS access.

## 3.4 BASELINE PRIVACY POLICY

Collection of Personal Information

Personal information will be collected for the HMIS only when it is needed to provide services, when it is needed for another specific purpose of the agency where a client is receiving services, or when it is required by law. Personal information may be collected for these purposes:

* To provide or coordinate services for clients
* To find programs that may provide additional client assistance
* To comply with government and grant reporting obligations
* To assess the state of homelessness in the community, and to assess the condition and availability of affordable housing to better target services and resources

Only lawful and fair means are used to collect personal information.

Personal information is collected with the knowledge and consent of clients. It is assumed that clients consent to the collection their personal information as described in this notice when they seek assistance from an agency using the HMIS and provide the agency with their personal information.

If an agency reasonably believes that a client is a victim of abuse, neglect or domestic violence, or if a client reports that he/she is a victim of abuse, neglect or domestic violence, explicit permission is required to enter and share the client’s information in the HMIS.

Personal information may also be collected from:

* Additional individuals seeking services with a client
* Other private organizations that provide services and participate in the HMIS

Upon request, clients must be able to access the *Use and Disclosure of Personal Information* policy found below.

Use and Disclosure of Personal Information

These policies explain why an agency collects personal information from clients. Personal information may be used or disclosed for activities described in this part of the notice. Client consent to the use or disclosure of personal information for the purposes described in this notice, and for reasons that are compatible with purposes described in this notice but not listed, is assumed. Clients must give consent before their personal information is used or disclosed for any purpose not described here.

Personal information may be used or disclosed for the following purposes:

1. *To provide or coordinate services to individuals. Client records are shared with other organizations that may have separate privacy policies and that may allow different uses and disclosures of the information. If clients access services at one of these other organizations, they will be notified of the agency’s privacy and sharing policy.* {OPTIONAL}
2. To carry out administrative functions such as legal audits, personnel, oversight, and management functions.
3. For research and statistical purposes. Personal information released for research and statistical purposes will be de-identified.
4. For academic research conducted by an individual or institution that has a formal relationship with the Institute for Community Alliances. The research must be conducted by an individual employed by or affiliated with the organization or institution. All research projects must be conducted under a written research agreement approved in writing by the Designated Agency HMIS Contact or executive director. The written research agreement must:
* Establish the rules and limitations for processing personal information and providing security for personal information in the course of the research.
* Provide for the return or proper disposal of all personal information at the conclusion of the research.
* Restrict additional use or disclosure of personal information, except where required by law.
* Require that the recipient of the personal information formally agree to comply with all terms and conditions of the written research agreement, and
* Be substituted, when appropriate, by Institutional Review Board, Privacy Board or other applicable human subjects’ protection institution approval.
1. When required by law. Personal information will be released to the extent that use or disclosure complies with the requirements of the law.
2. To avert a serious threat to health or safety if:
* the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
* the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
1. To report to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence, information about an individual reasonably believed to be a victim of abuse, neglect or domestic violence. When the personal information of a victim of abuse, neglect or domestic violence is disclosed, the individual whose information has been released will promptly be informed, except if:
* it is believed that informing the individual would place the individual at risk of serious harm, or
* a personal representative (such as a family member or friend) who is responsible for the abuse, neglect or other injury is the individual who would be informed, and it is believed that informing the personal representative would not be in the best interest of the individual as determined in the exercise of professional judgment.
1. For a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
* In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer or a grand jury subpoena, if the court ordered disclosure goes through the Institute for Community Alliances and is reviewed by the Executive Director for any additional action or comment.
* If the law enforcement official makes a written request for personal information. The written request must meet the following requirements:
1. Be signed by a supervisory official of the law enforcement agency seeking the personal information.
2. State how the information is relevant and material to a legitimate law enforcement investigation.
3. Identify the personal information sought.
4. Be specific and limited in scope to the purpose for which the information is sought, and
5. Be approved for release by the Institute for Community Alliances legal counsel after a review period of seven to fourteen days.
* If it is believed that the personal information constitutes evidence of criminal conduct that occurred at the agency where the client receives services.
* If the official is an authorized federal official seeking personal information for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to a foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 (threats against the President and others), and the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
1. For law enforcement or another public official authorized to receive a client’s personal information to conduct an immediate enforcement activity that depends upon the disclosure. Personal information may be disclosed when a client is incapacitated and unable to agree to the disclosure if waiting until the individual is able to agree to the disclosure would materially and adversely affect the enforcement activity. In this case, the disclosure will only be made if it is not intended to be used against the individual.
2. To comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

Inspection and Correction of Personal Information

Clients may inspect and receive a copy of their person information maintained in the HMIS. The agency where the client receives services will offer to explain any information that a client may not understand.

If the information listed in the HMIS is believed to be inaccurate or incomplete, a client may submit a verbal or written request to have his/her information corrected. Inaccurate or incomplete data may be deleted, or marked as inaccurate or incomplete and supplemented with additional information.

A request to inspect or copy one’s personal information may be denied if:

* The information was compiled in reasonable anticipation of litigation or comparable proceedings
* The information was obtained under a promise or confidentiality and if the disclosure would reveal the source of the information, or
* The life or physical safety of any individual would be reasonably endangered by disclosure of the personal information.

If a request for inspection access or personal information correction is denied, the agency where the client receives services will explain the reason for the denial. The client’s request and the reason for the denial will be included in the client’s record.

Requests for inspection access or personal information correction may be denied if they are made in a repeated and/or harassing manner.

Limits on Collection of Personal Information

Only personal information relevant for the purpose(s) for which it will be used will be collected. Personal information must be accurate and complete.

Client files not used in seven years may be made inactive in the HMIS. ICA will check with agencies before making client files inactive. Personal information may be retained for a longer period if required by statute, regulation, contract or another obligation.

Limits on Partner Agency Use of the HMIS Client Information

The Rock River HMIS is a shared data system. This system allows Partner Agencies to share client information in order to coordinate services for clients. However, Partner Agencies may not limit client service or refuse to provide service in a way that discriminates against clients based on information the Partner Agency obtained from the HMIS. Partner Agencies may not penalize a client based on historical data contained in the HMIS.

Youth providers serving clients under the age of 18 must maintain closed HMIS client files. Youth under the age of 18 may not provide either written or verbal consent to the release of their personally identifying information in the HMIS.

Complaints and Accountability

Questions or complaints about the privacy and security policies and practices may be submitted to the agency where the client receives services. Complaints specific to the HMIS should be submitted to the HMIS Designated Agency HMIS Contact and program director. If no resolution can be found, the complaint will be forwarded to the System Administrators, and the agency’s executive director. If there is no resolution, the Rock River HMIS Governance Committee will oversee final arbitration. All other complaints will follow the agency’s grievance procedure as outlined in the agency’s handbook.

All the HMIS users (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy notice. Users must receive and acknowledge receipt of a copy of this privacy notice.

## 3.5 USE OF A COMPARABLE DATABASE BY VICTIM SERVICE PROVIDERS

Victim service providers, private nonprofit agencies whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking, must not directly enter or provide data into the HMIS if they are legally prohibited from participating in the HMIS. Victim service providers that are recipients of funds requiring participation in the HMIS, but are prohibited from entering data in the HMIS, must use a comparable database to enter client information. A comparable database is a database that can be used to collect client-level data over time and generate unduplicated aggregated reports based on the client information entered into the database. The reports generated by a comparable database must be accurate and provide the same information as the reports generated by the HMIS.

##  3.6 USER CONFLICT OF INTEREST

Users who are also clients with files in the HMIS are prohibited from entering or editing information in their own file. All users are also prohibited from entering or editing information in files of immediate family members. All users must sign the Rock River HMIS User Agreement, which includes a statement describing this limitation, and report any potential conflict of interest to their Agency Administrator. The System Administrator may run the audit trail report to determine if there has been a violation of the conflict of interest agreement.

## 3.7 SECURITY PROCEDURE TRAINING FOR USERS

All users must receive security training prior to being given access to the HMIS. Security training will be covered during the new user training for all new users. All users must receive ongoing annual training on security procedures from the Institute for Community Alliances.

## 3.8 VIOLATION OF SECURITY PROCEDURES

All potential violations of any security protocols will be investigated and any user found to be in violation of security protocols will be sanctioned accordingly. Sanctions may include but are not limited to: a formal letter of reprimand, suspension of system privileges, revocation of system privileges and criminal prosecution.

If possible, all confirmed security violations will be communicated in writing to the affected client within 14 days, unless the client cannot be located. If the client cannot be located, a written description of the violation and efforts to locate the client will be prepared by the System Administrator at the Institute for Community Alliances, and placed in the client’s file at the Agency that originated the client’s record.

Any agency that is found to have consistently and/or flagrantly violated security procedures may have their access privileges suspended or revoked. All sanctions are imposed by the ICA HMIS staff. All sanctions may be appealed to the HMIS Governance Committee.

##  3.9 PROCEDURE FOR REPORTING SECURITY INCIDENTS

Users and Agency Administrators should report all unlawful access of the HMIS and unlawful attempted access of the HMIS. This includes theft of usernames and passwords. Security incidents should be reported to the ICA System Administrator. The ICA System Administrator will use the HMIS user audit trail report to determine the extent of the breach of security.

## 3.10 DISASTER RECOVERY PLAN

Mediware Disaster Recovery Plan

The Rock River Homeless Coalition’s HMIS is covered under Mediware Disaster Recovery Plan. Due to the nature of technology, unforeseen service outages may occur. In order to assure service reliability, Mediware provides the following disaster recovery plan. Plan highlights include:

* Database tape backups occur nightly.
* Tape backups are stored offsite.
* Seven day backup history is stored locally on instantly accessible Raid 10 storage.
* One month backup history is stored off site.
* Access to Mediware emergency line to provide assistance related to “outages” or “downtime” 24 hours a day.
* Data is backed up locally on instantly-accessible disk storage every 24 hours.
* The application server is backed up offsite, out-of-state, on a different internet provider and on a separate electrical grid via secured Virtual Private Network (VPN) connection.
* Backups of the application site are near-instantaneous (no files older than 5 minutes).
* The database is replicated nightly at an offsite location in case of a primary data center failure.
* Priority level response (ensures downtime will not exceed 4 hours).

Standard Data Recovery

The Rock River Homeless Coalition’s HMIS database is available online, and is readily accessible for approximately 24 hours a day. Tape backups of the database are kept for approximately one month. Upon recognition of a system failure, the HMIS can be copied to a standby server. The database can be restored, and the site recreated within three to four hours if online backups are accessible. As a rule, a tape restoration can be made within six to eight hours. On-site backups are made once daily. A restore of this backup may incur some data loss between when the backup was made and when the system failure occurred.

All internal servers are configured in hot-swappable hard drive RAID configurations. All systems are configured with hot-swappable redundant power supply units. Our Internet connectivity is comprised of a primary and secondary connection with separate internet service providers to ensure redundancy in the event of an ISP connectivity outage. The primary Core routers are configured with redundant power supplies, and are configured in tandem so that if one core router fails the secondary router will continue operation with little to no interruption in service. All servers, network devices, and related hardware are powered via APC Battery Backup units that are connected in turn to electrical circuits, which are connected to a building generator.

All client data is backed-up online and stored on a central file server repository for 24 hours. Each night a tape backup is made of the client database and secured in a bank vault.

Historical data can be restored from tape as long as the data requested is newer than 30 days old. As a rule, the data can be restored to a standby server within four hours without affecting the current live site. Data can then be selectively queried and/or restored to the live site.

For power outage, the HMIS is backed up via APC battery back-up units, which are connected via generator-backed up electrical circuits. For a system crash, a system restore will take four hours. There is potential for some small data loss (data that was entered between the last backup and when the failure occurred) if a tape restore is necessary. If the failure is not hard drive related, the data restore time will possibly be shorter as the drives themselves can be repopulated into a standby server.

All major outages are immediately brought to the attention of executive management. Mediware support staff helps manage communication or messaging to the System Administrator as progress is made to address the service outage.

The Rock River HMIS Disaster Recovery Plan

The Institute for Community Alliances operates a regional approach to administering the Rock River HMIS. The ICA Rock River HMIS office is currently in Madison, Wisconsin. In the event of a localized emergency or disaster, ICA will shift responsibility for administering the HMIS and managing day-to-day operations of the system to an unaffected site.

# 4. Data Requirements

## 4.1 MINIMUM DATA COLLECTION STANDARD

Partner Agencies are responsible for asking all clients a minimum set of questions for use in aggregate analysis. These questions are included in custom assessments that are created by the HMIS System Administrators. The required data elements depend on the program. The mandatory data elements in each assessment are displayed in *red* text and/or specific text indicating that the field is required.

The Designated Agency HMIS Contact must identify the assessments and requirements for each program. ICA will consult with the Designated Agency HMIS Contact to properly set up each program in the HMIS.

Guidelines clearly articulating the minimum expectations for data entry for all programs entering data in the HMIS will be sent to Agency Administrators and posted on the Institute for Community Alliances' Rock River HMIS webpage. Agency Administrators must ensure that the minimum data elements are fulfilled for every program.

##  4.2 PROVIDER NAMING CONVENTION

All providers within the HMIS must be named so that they accurately reflect the type of service carried out by the corresponding Partner Agency program.

## 4.3 DATA QUALITY PLAN

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. No data collection system has a quality rating of 100%. However, to meet the goals set forth by the Rock River Homeless Coalition when presenting accurate and consistent information on homelessness, it is critical that the HMIS have the best possible representation of reality as it relates to persons experiencing homeless and the projects that serve them. Specifically, the goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact on the homeless service system. To that end, the CoC will collectively assess the quality of our data by examining characteristics such as timeliness, completeness, and accuracy.

See Appendix 7 for the complete Data Quality Plan.

##  4.4 DATA IMPORTS

While the HMIS databases are required to have the capacity to accept data imports, The Rock River Homeless Coalition reserves the right to not allow data imports into the HMIS. Allowing data imports will impact data integrity, create issues for coordinated entry, and increase the likelihood of duplication of client files in the system.

##  4.5 The HMIS DATA PROTECTION

As the HMIS Lead Agency, it is the responsibility of ICA to maintain the HMIS, including protecting the data contained in the HMIS. In the case where ICA is made aware through data contained in the HMIS that Partner Agency program funds were used for an ineligible service, ICA will notify the Partner Agency about the misuse of funds. If the Partner Agency fails to rectify the misuse of funds in a timely fashion, ICA will notify the appropriate funding body.

#  5. Glossary

**Aggregated Public Data** – data that is published and available publicly. This type of data does not identify clients listed in the HMIS.

**Closed Data** – information entered by one provider that is not visible to other providers using the HMIS.

**Confidential Data** – contains personal identifying information.

**Designated Agency HMIS Contact**– the individual responsible for the HMIS use at each partner agency.

**ICA** – the Institute for Community Alliances, which is the HMIS Lead Agency.

**HMIS – Homeless Management Information System** – an internet-based database that is used by homeless service organizations across Rock River Homeless Coalition to record and store client-level information about the numbers, characteristics and needs of homeless persons and those at risk of homelessness.

**HMIS Governance Committee** – the group of the HMIS users who are responsible for approving and implementing the HMIS Policies and Procedures, and for working to make improvements to the Rock River Homeless Coalition’s HMIS.

**HMIS License Fee** – the annual fee paid by partner agencies to allow each HMIS user at their agency continued access to the database.

**HMIS User Level** – HMIS users are assigned a specific user level that limits the data the user is able to access in the database.

**HMIS Vendor** – the Rock River HMIS software vendor is Mediware. The HMIS vendor designs the HMIS and provides ongoing support to the System Administrators.

**Minimum Data Entry Standards** – a minimum set of questions that must be completed for each client to provide data for use in aggregate analysis.

**Open Data** – does not contain personal identifying information.

**Partner Agencies** – the homeless service organizations that use the HMIS.

**System Administrators** – staff at ICA who are responsible for overseeing the HMIS users and use in Rock River Homeless Coalition. The System Administrators allow users HMIS access and provide training; ensure user compliance with the HMIS policies and procedures; and make policy recommendations to the Steering Committee.

**Shared Data** – unrestricted information that has been entered by one provider and is visible to other providers using the HMIS.

**Unpublished Restricted Access Data** – information scheduled, but not yet approved, for publication.

**Victim Service Provider** – a nonprofit agency with a primary mission to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

# 6. Appendix 1: Data Dictionary and Data Manual

The [HMIS Data Standards Manual](https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf) is intended to serve as a reference and provide basic guidance on the HMIS data elements for CoCs, the HMIS Lead Agencies, the HMIS System Administrators, and users. The companion document to the HMIS Data Manual is the [HMIS Data Dictionary](https://www.onecpd.info/resource/3824/hmis-data-dictionary/).

The HMIS Data Dictionary is designed for the HMIS vendors, the HMIS Lead Agencies, and the HMIS system administrators to understand all of the data elements required in an HMIS, data collection and function of each required element and the specific use of each element by the appropriate federal partner. The HMIS Data Dictionary should be the source for the HMIS software programming.

The HMIS systems must be able to collect all of the data elements defined in the HMIS Data Dictionary, support system logic identified in this document, and ensure that data collection and the visibility of data elements is appropriate to the project type and federal funding source for any given project.

# 7. Appendix 2: Data Quality Plan

Data quality is vitally important to the success of the HMIS and the programs that use this database. The Federal Partners and other funders monitor the quality of the HMIS data through the Annual Homelessness Assessment Report, System Performance Measures, the CoC Program Competition, and a variety of other program reports. If the quality of the data are poor, funders may refuse to grant funding or reduce future funding. These funding cuts could negatively affect program(s) throughout the Rock River Homeless Coalition. As it is imperative that the data are correct, The HMIS participating providers and ICA staff will work diligently on adhering to the HMIS Data Standards in order to ensure all reports are complete, consistent, accurate, and timely.

## 7.1 GOALS OF THE DATA QUALITY PLAN

In coordination with the Rock River HMIS Governance Committee, a data quality plan was established. The goals of this plan are to:

* Help ensure the availability of timely and accurate data for use in helping to end homelessness.
* Identify problems early and increase the usability of data.
* Prepare data for federal, state, and local reporting processes.
* Support the efforts of the HEARTH Act implementation, including Coordinated Entry.

Agencies and program providers will also benefit from participating in this process by:

* Requiring less corrections right before reports are due, because data will be cleaned up regularly.
* Providing access to more up-to-date information to inform program decisions, monitor client progress, and inform stakeholders about programs.
* Implementing changes when needed and measuring progress against goals.

## 7.2 DATA QUALITY PLAN AND RESPONSIBILITIES

*Rock River HMIS Committee Role*

* Have an ongoing relationship with the HMIS Staff from each agency to identify training needs based on monthly data quality reports.
* Develop the HMIS Policies and Procedures, including a Data Quality and Security Plan, which are updated annually.
* Meet annually to discuss changes and updates in the system.

*Funder Role*

* Create a framework of performance expectations that will enable the funder to rank and rate projects and target funding based on need.
* Monitor the established baseline standards for participation and data collection as set forth by the HMIS Data Standards.
* Perform site visits yearly that will include comparing paper files to the data entered into the HMIS to check for data accuracy and completeness.

*ICA HMIS Staff Role*

* Review the data quality reports for the Rock River Homeless Coalition.
* If a provider has data quality issues, forward the report to the provider, so they can fix their data.
* Review the provider list for each report. If there are missing or incorrect providers on the list, confirm those with the program provider.
* Run the Data Completeness Report Card monthly.
* Run the Data Incongruity Locator custom reports at least quarterly.
* Assist funders with monitoring when appropriate and provide technical assistance regularly to non-funded HMIS participating agencies.
* Provider on-going HMIS training for existing end-users.

*Designated Agency HMIS Contact Role*

* Review data quality reports sent to you by ICA HMIS Staff person(s).
* If you have data quality issues, correct them as soon as possible.
* Run data quality reports to check client data on a monthly basis. Use these data quality reports in conjunction with your existing data checking reports frequently to check your data.

*User Role*

* Review data quality reports sent to you by your Designated Agency HMIS Contact.
* Correct data quality issues as soon as possible.
* At intake, gather the most complete and accurate information you can about each client and the services they need in a timely manner.

## 7.3 DATA COMPLETENESS

All data entered into the HMIS must be complete. Completeness is the level at which a field has been answered in whole or in its entirety. Measuring completeness can ensure that client profiles are accurately answered in whole and that an entire picture of the client situation emerges. Partially complete or missing data (e.g., missing the SSN, missing the date of birth, missing information on disability or missing veteran status) can negatively affect the CoC’s ability to provide comprehensive care to clients. Incomplete data results in an inaccurate picture of the need in the CoC, directly affecting services in individual communities necessary to permanently house clients. It is every HMIS end user’s responsibility to report an accurate picture of populations served to facilitate accurate reporting and analysis.

The ultimate goal is to collect 100% of all data elements for all household members. However, the Rock River HMIS Committee recognizes that this may not be possible in all cases. Therefore, an acceptable range of null/missing and unknown/don’t know/refused responses has been established, depending on the data element and the project type. Missing data elements are data elements that were either not collected, or collected but were not entered into the HMIS. Don’t know/refused data elements are those data elements that were not collected because the client either doesn’t remember the information or refuses to answer the question. Don’t know/refused is from the clients’ perspective and is not used to denote that the information was not collected.

Participating agencies will be expected to record the most complete data possible. Only when a client refuses to provide his or her or dependent’s personal information and the project funder does not prohibit it, it is permissible to enter incomplete client data.

 Some required procedures to follow are:

* If a client refuses to provide the remaining identifiable elements, record the answer as “refused.”
* If a client’s record already exists in the HMIS, the agency must not create a new record. Duplicate client records entered may affect agency’s overall data completeness and accuracy rates.

*Note: A client may not wish to provide information to the HMIS. This is their right and an HMIS Participating Agency cannot deny services to any client refusing inclusion in the HMIS. However, in order for HUD funded providers to accurately complete reporting for their projects, either a De-identified client record must be created in the HMIS or the client’s information and services must be tracked on paper.*

## 7.4 DATA COMPLETENESS STANDARDS

* *Emergency Shelter projects:*All Universal Data Elements will be entered with an overall completeness rate of 95% or greater.
* *Outreach projects:* All Universal and Project Specific Data Elements (if HUD or SAMHSA funded) will be entered with an overall completeness rate of 90% or greater ***after client enrollment date.***
* *Permanent Supportive Housing projects (including HUD-VASH):*All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
* *Transitional Housing projects:*All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
* *Rapid Re-Housing Projects:*All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
* *Prevention projects:* All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
* *HOPWA projects:* All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
* *CoC-funded Coordinated Entry:* All Universal Data Elements and Project Specific Data Elements will be entered with an overall completeness rate of 90% or greater.
* *Supportive Services Only projects:* All Universal Data Elements and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.

## 7.5 DATA CONSISTENCY

ICA HMIS Staff will evaluate the quality of all the HMIS Participating Agency data on the consistency of the data being entered. All Participating Agencies across should work consistently to reduce duplication in the HMIS by following workflow practices outlined in training. The HMIS end users are trained to search for existing clients in the system, across multiple parameters, before adding a new client into the system. Client data can be searched by Client ID, Name, Social Security Number, and Client Alias. End Users are trained to follow this protocol when adding a new client in the system.

Data consistency will ensure that data is understood, collected, and entered consistently across all projects in the HMIS. Consistency directly affects the accuracy of data; if an end user collects all of the data, but they don't collect it in a consistent manner, then the data may not be accurate. All data in the HMIS shall be collected and entered in a common and consistent manner across all projects. To that end, all end users will complete an initial training before accessing the live HMIS system.

ICA HMIS staff will provide regular training, refresher courses, as well as, updated data entry workflows and sample intake forms as a guide for quick reference when collecting and entering data to ensure that data is understood, collected and entered consistently across all programs in the HMIS.

ICA HMIS staff will review data entries in the database quarterly for duplicate entries, and merge any duplicate client records found at this time. If a Participating Agency is consistently creating duplicate clients, the HMIS staff will contact the Designated Agency HMIS Contact to notify and address the end user creating the duplication, so future duplication can be avoided.

All HMIS Participating Agency client data should adhere to the HMIS capitalization guidelines. The HMIS end users are trained on the current method and style to enter client level data. For example, client names are entered with the first initial of the first and last name capitalized (i.e., First Last). No client name should be entered in any of the following ways:

* ALL CAPS
* all lower case
* Mix of lower and upper case letters
* Nicknames in the Name space (use the Alias box instead.)

## 7.6 DATA ACCURACY

Accurate data ensures that the HMIS is the best possible representation of reality as it relates to persons experiencing homelessness and the programs serving them on a day-to-day basis. Accuracy can be difficult to assess as it depends on the client providing correct data and the intake worker’s ability to document and enter the data accurately. Accuracy is best determined by comparing records in the HMIS to paper records, or the records of another reliable provider. For example, a SSN in question can be compared to a paper case file or SSI benefit application. In-person interviews, with clients participating in projects who are utilizing the HMIS, are another method for assessing accurate data entry. Evaluation for accurate documentation of case management, service transactions and referrals in the HMIS can be assessed by client interviews. In-person interviews with clients may be coordinated with funders during HUD monitoring or performed individually with non-HUD funded Participating Agencies by the HMIS staff, when appropriate.

Information entered into the HMIS needs to be valid, meaning it needs to accurately represent information on the participants of the homeless service projects contributing data to the HMIS Implementation. Inaccurate data may be intentional or unintentional. In general, false or inaccurate information is less desirable than incomplete information, since with the latter, it is at least possible to acknowledge the gap. Thus, it should be emphasized to clients and staff that it is better to enter nothing (or preferably “client doesn't know” or “refused”) than to enter inaccurate information. To ensure the most up-to-date and complete data, data entry errors should be corrected on a monthly basis.

All data entered into the HMIS shall be a reflection of information provided by the client, as documented by the intake worker or otherwise updated by the client and documented for reference. Recording inaccurate information is strictly prohibited.

## 7.7 DATA ACCURACY STANDARD

|  |  |  |  |
| --- | --- | --- | --- |
| **Data Quality Measurements: Accurate Data\***  | **Data Quality Report Name**  | **Applicability of Standard by Project Type**  | **Max Allowed**  |
| Missing Entry/Exits  | Entry Exit Data Quality | All Projects  | 0%  |
| Incorrect Entry Type  | Entry Exit Data Quality | All Projects  | 0%  |
| Duplicate Entry/Exits  | Entry Exit Data Quality | All Projects  | 0%  |
| Future Entry/Exits  | Entry Exit Data Quality | All Projects  | 0%  |
| Missing Exit Dates | Unexited Clients Exceeding Max Length of Stay | All Projects | 0% |
| Unknown Destinations  | Entry Exit Data Quality | All Projects  | 50% for CE, 20% for ES 20% for Outreach3% All Other Types |
| Children Only Households  | Entry Exit Data Quality | All Projects  | 0%  |
| Missing Head of Household  | Entry Exit Data Quality | All Projects  | 0%  |
| Missing Services and Referrals | PATH Data Completeness: 2016 Standards | PATH | 0%  |
| Service Dates fall outside of Entry and Exit Dates  | PATH Data Completeness: 2016 Standards | PATH | 0%  |

##

## 7.8 BED/UNIT UTILIZATION RATES

One of the primary features of the HMIS is the ability to record the number of client stays or bed nights at a homeless assistance project. The count of clients in a project on a given night is compared to the number of beds reported in the Housing Inventory Count (HIC) to return the agency’s Bed Utilization percentage. The generally acceptable range of bed utilization rates for established projects is 65%- 105%

|  |  |  |
| --- | --- | --- |
| **Project Types**  | **Lowest Acceptable Bed Utilization Rate**  | **Highest Acceptable Bed Utilization Rate**  |
| ES, TH, PSH, RRH  | 65%  | 105%  |

## 7.9 MONITORING PLAN

The Rock River Homeless Coalition recognizes that the data produced from the HMIS is critical to meet the reporting and compliance requirements for individual partner agencies and the HMIS implementation as a whole. As such, all the HMIS partner agencies are expected to meet the data quality benchmarks described in this document.

To achieve this, the HMIS data will be monitored on a monthly basis to quickly identify and resolve issues that affect the timeliness, completeness, consistency and accuracy of the data. All monitoring will be done in accordance with the data quality monitoring plan, with full support of the Rock River Homeless Coalition and the HMIS Committee.

The purpose of monitoring is to ensure that the agreed-upon data quality benchmarks are met to the greatest extent possible, and that data quality issues are quickly identified and resolved. To ensure that Participating Agencies have continued access to the expectations set forth in the data quality plan, the following protocol will be used:

1. The HMIS Governance Committees will have the ability to review and critique the Data Quality Plan draft prior to publication, and continue to provide input when updates are necessary.
2. Participating agencies will provide timely updates to the HMIS staff in their corresponding CoC regarding any changes to programs.
3. Data Quality reports will be reviewed at a minimum once a month by the HMIS staff and the Designated Agency HMIS Contact at all the HMIS participating agencies in the CoC.
4. The HMIS staff and participating agencies throughout each CoC must work to prevent duplicate data.
5. The HMIS staff will monitor the creation of duplicate client records within the system and correct at least quarterly.
6. Participating agencies must review hardcopy records and compare them to the HMIS data to ensure consistency.
7. The HMIS will provide new end users with new user training and provide existing users with access to training throughout the year to reflect any system updates.
8. The HMIS staff will assist programs within their CoC in correcting data and updating information as needed.
9. The HMIS staff will provide annual site visits to all participating agencies within their corresponding CoC with prior notification to provide technical assistance and assess the accuracy of client-level data entry.
10. Participating agencies that meet the data quality benchmarks will be periodically recognized by their respective HMIS Staff.

## 7.10 DATA QUALITY PLAN ENFORCEMENT

ICA HMIS Staff will take the following steps to enforce the Data Quality Plan:

1. ICA HMIS staff will first provide additional in-person technical assistance for participating agencies that fail to meet the data quality benchmarks set forth in this document.
2. If corrective action is not taken, ICA HMIS staff will send the HMIS participating agency a notice stating they are noncompliant with the standards set for data quality. The participating agency will be asked to submit a plan to the ICA HMIS staff describing how they intend to improve their data quality to meet Rock River Homeless Coalition standards.
3. If a plan of action is requested, and is not submitted within the allotted time frame, the ICA HMIS staff may suspend all end-user accounts under that project for a period no longer than 7 days.
4. After the suspension, end-user accounts will be restored, and the HMIS participating agency will have the opportunity to correct data until the next month’s review and will follow the same process as before. ICA HMIS staff will report the suspension to the Rock River Homeless Coalition Board of Directors.
5. If the HMIS participating agency’s account needs to be suspended for a second time, the ICA HMIS Staff may suspend user accounts for up to 30 days. Should the problem persist, or in the event that the participating agency fails to submit a written plan, ICA may suspend the participating agency’s ability to enter data into the HMIS, and will contact any appropriate state and federal funders, notifying these funders of the participating agency’s non-compliance with the HMIS data entry mandates. ICA HMIS staff will report the suspension to the Rock River Homeless Coalition Board of Directors.

The ICA HMIS staff will investigate all potential violations of any security protocols. A participating agency’s access may also be suspended or revoked if serious or repeated violation(s) of the HMIS Policies and Procedures occur by agency users. Any user found to be in violation of security protocols will be sanctioned which may include, but are not limited to:

* A formal letter of reprimand
* Suspension of system privileges
* Revocation of system privileges