



St. Charles, Lincoln, & Warren
Continuum of Care

MO-503 Continuum of Care - St. Charles, Lincoln and Warren Counties

Homeless Management
Information (HMIS) Policy and
Procedure Manual

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Introduction

This manual provides the framework for ongoing operations of the MO-503 (St. Charles, Lincoln and Warren Counties) Continuum of Care (CoC) Community Information Sharing System (HMIS). The HMIS meets the Homeless Management Information Systems (HMIS) requirements set by HUD. It is extremely important in the use of HMIS that client confidentiality, privacy, and security are maintained at the highest level. The policies and procedures written in this document fulfill basic HUD and HMIS Requirements.

Project Overview provides the main objectives, direction, and vision of MO-503 Community Information Sharing System.

Operating Procedures provides specific policies and procedures necessary to ensure compliance in:

- Project Participation
- User Designation
- Training
- Client Information
- Technical Requirements
- Technical Support

Forms provide information on obtaining forms as well as sample copies.

HMIS Purpose and Philosophy Statement

MO-503 St Charles, Lincoln & Warren Counties Continuum of Care Purpose and Philosophy of HMIS

The HMIS is a web-based data sharing system used to track services and outcomes for persons receiving assistance in our community, with a focus on homeless assistance and housing. The HMIS solution selected by the St. Charles, Lincoln, and Warren Counties Continuum of Care (MO-503) is provided by **CaseWorthy**. All organizations providing assistance in our community to persons experiencing homelessness are encouraged to participate in the Continuum of Care HMIS. Organizations and agencies receiving federal funding and certain other public funding are required to participate in the Continuum HMIS.

Community-wide participation in the local HMIS will help the Continuum of Care in coordinated planning to end homelessness. Broad participation by service organizations will allow our community to better track homeless service outcomes and to improve the service network for persons experiencing homelessness. Participation in the HMIS will assist in securing and retaining homeless assistance funding.

The Community Council of St. Charles County is the lead agency responsible for implementation of the HMIS for the St. Charles, Lincoln, and Warren County Continuum of Care (MO-503). The Continuum of Care, with the support of Community Council staff, guides HMIS planning, software selection, and oversight of the database according to the U.S. Department of Housing and Urban Development's (HUD) Homeless Management Information System (HMIS) standards.

Community Council's role as the lead agency for the HMIS is to encourage, coach and support local service providers in their participation in our community information system. It is also the Community Council's task, along with the Continuum Steering Committee, to monitor data input and security procedures. Community Council will provide non-identifying, aggregate quarterly reports from the HMIS on community progress to end homelessness for our Continuum. Non-identifying, aggregate demographic data on the number and characteristics of persons experiencing homelessness in our community will also be shared with federal, state, local, and regional officials, as required and appropriate.

Broad participation by service organizations in the HMIS will assist our Continuum to coordinate services more effectively and to maximize resources; having this data will allow us to identify gaps in services as well as program successes and assist in community planning to end homelessness. HMIS data will be an essential tool in highlighting programs and services that are the most effective at reducing and ending homelessness.

It is not the intent of the Continuum of Care or Community Council to use data in the HMIS to deny services to persons needing assistance. Rather, being able to track and to build on the assistance provided by other service providers will allow our community to achieve better outcomes and promote longer term stability for persons experiencing homelessness. **All users of the HMIS must adhere to strict privacy protections and security protocols detailed in HUD published data, and protect the privacy and confidentiality of the persons with data in our system.** (Revised December, 2013)

Project Overview

The Department of Housing and Urban Development (HUD) and its “HMIS” Requirement

In July 2003, the Department of Housing and Urban Development (HUD) published a draft notice of a Homeless Management Information System (HMIS). The notice prompted communities around the nation to set up an HMIS database to capture required Universal Data Elements and established minimum policies and procedures communities were required to put in place.

An HMIS is an electronic data collection system that stores information about the individuals who seek homeless services. It is a valuable resource because of its capacity to integrate and un-duplicate data from all homeless assistance and homelessness prevention programs in a Continuum of Care (CoC). Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at the local, state, and national levels. It enables organizations that operate homeless assistance and homelessness prevention programs to improve the services they provide by collecting information about clients’ needs.

In March 2010, HUD released a new set of Program Data Elements – that is, data to be collected about all homeless assistance and homelessness prevention programs in the CoC, by program type. These data elements are needed for reports to be submitted as part of the annual CoC application for funding. In addition, there were revisions to the Data Standards for Universal Data Elements. All CoC housing programs participating in a community HMIS must enter required Universal Data and Program Data Elements. The Department of Housing and Urban Development (HUD), the Department of Health and Human Services (HHS), and the Department of Veterans Affairs (VA) released the 2014 HMIS Data Dictionary and 2014 HMIS Data Manual on May 1, 2014, updating the 2004 HMIS Data and Technical Notice and the 2010 HMIS Data Standards Notice. The HMIS Data Standards outlined in these two documents provide communities with baseline data collection requirements developed by HUD, HHS, and VA.

Since first publication, the HMIS Data Standards Manual and accompanying HMIS Data Dictionary have seen multiple revisions. The HMIS Data standards manual was most recently updated September 6, 2016, to include additional changes made in Version 5.1, released August 2016. Effective October 1, 2016, all HMIS solutions must be programmed to collect data based on the updated data standards and dictionary.

Federal Reporting requirements for non-identifying community information

Community Council uploads the following community level reports from our community HMIS system on behalf of the MO-503 Continuum of Care:

- Annual Point in Time Homeless Count (PIT) – sheltered count data from the January Point-in-time count is pulled from CaseWorthy for federal data submission.
- Housing Inventory Chart (HIC) - An inventory of housing available to shelter homeless persons in the community including a tally of beds and units available on the night of the annual Point in Time homeless count. The housing inventory specifies program type, including beds dedicated to serve persons who are homeless as well as persons in Permanent Supportive Housing.
- CoC Annual Performance Report (APR) – The CoC APR is submitted annually with the CoC Collaborative Application, and evaluates community progress across HUD funded CoC programs.
- Systems Performance Report (SysPM) - This annual performance report tracks 7 community-level performance measures to understand how housing programs help to re-stabilize homeless persons. Performance progress is reported at the community level.
- Longitudinal System Analysis (LSA) – The LSA helps communities to understand how their homeless service system is helping to stabilize homeless households. Tracking households through the system, communities can better understand how homeless persons are moving through their service system toward stability.

Federal data reports are rejected if community data quality and timeliness is inadequate. This can ultimately impact community funding levels for homeless services. Community Council works with partner organizations to monitor and improve data quality so Community reporting is accurate and complete.

Continuum of Care (CoC)

CoC members participate in a long-range community planning process that addresses the needs of persons experiencing homelessness, in order to help them reach maximum self-sufficiency. Each CoC is responsible for working with homeless assistance organizations in their geographic area to coordinate the delivery of housing and services to homeless families, individuals, youth, and persons with disabilities. Additionally, the CoCs are responsible for implementing and managing the HMIS within their CoC. Missouri is organized into eight geographically-based Continuums of Care (CoC).

The eight CoCs in Missouri are:

Joplin CoC – Jasper and Newton counties

St. Louis City CoC – St. Louis City

Kansas City CoC – Jackson County

St. Louis County CoC – St. Louis County

Springfield Area CoC – Christian, Greene, and Webster counties

St. Joseph CoC – Andrews, Buchanan, and Dekalb counties

St. Charles CoC – St. Charles, Lincoln and Warren counties

Balance of State CoC – Remaining 101 counties of Missouri

Community Council of St. Charles County

The Community Council of St. Charles County is funded by the United States Housing and Urban Development (HUD) office to administer the Homeless Management Information System (HMIS) for the St. Charles, Lincoln and Warren (MO-503) Continuum of Care. Community Council is responsible for the implementation of the HMIS, including ensuring that all privacy, confidentiality and security policy and procedures are followed according to HUD's HMIS standards.

Homeless Management Information System (HMIS)

HMIS is a shared database for the use of organizations that provide assistance to individuals who are homeless or who are at risk of becoming homeless. The main purposes of HMIS are to provide better coordination of services and to measure the extent and nature of homelessness. HMIS is used to streamline the intake and referral process for human service agencies in the community. Service providers can input data into HMIS and share it, to the extent allowed, with each other. The data collected in HMIS presents communities with the opportunity to re-examine how homeless services are provided in their community and to determine the best use of those services, as well as to identify gaps in the local service continuum and develop outcome measurements. HMIS is a secure, private database accessed via the Internet, accessible only by authorized HMIS Users.

CaseWorthy

CaseWorthy is the HMIS Solution used in the St. Charles Continuum of Care (MO-503). Partner organizations in the MO-503 implementation of CaseWorthy will include service providers in St. Charles, Lincoln and Warren Counties. CaseWorthy is not only able to serve agencies reporting housing services, but is also a robust case management system for other human service organizations. CaseWorthy is able to track program outcomes and services across a wide variety of programs and funders.

Partner HMIS Agency

A Partner HMIS Agency is any organization providing housing , homeless prevention assistance, and/or other supportive services to families and individuals who are experiencing homelessness or who are at risk of becoming homeless, and is enrolled in and actively entering data into the HMIS. Each Partner HMIS Agency must sign and abide by the Agency HMIS Partner Agreement. This agreement is signed and renewed annually.

HMIS User

A HMIS User is an individual who has been identified by a Partner HMIS Agency as a person to have access into the HMIS and has completed the required new user and confidentiality trainings. The HMIS User will sign a User Policy and Responsibility agreement prior to receiving access to the database. This agreement will be renewed annually.

Operating Policies and Procedures

Project Participation

Agency Partner Agreement

Service agencies and organizations may request permission to participate in the HMIS and become a Partner HMIS Agency. All agencies approved to access the HMIS must have a signed Agency HMIS Partner Agreement in place and agree to abide by the policies and procedures as outlined in this document. The Agency HMIS Partner Agreement is a contract between the Partner HMIS Agency and The Community Council of St. Charles County. The Partner HMIS Agreement outlines specific requirements on confidentiality, HMIS use, data entry, system security, and reporting. Any questions regarding the terms of the Agency HMIS Partner Agreement should be submitted to the HMIS Program Manager. The Partner HMIS Agency's Executive Director or other authorized representative must sign the Agency HMIS Partner Agreement in duplicate and mail both original forms, along with an annual cost share fee to:

Community Council of St. Charles County
Attention: HMIS Program Manager
P.O. Box 219
Cottleville, Mo 63338-0219

This fee will be based on annual maintenance costs and license fees. The HMIS Lead, at its discretion, may allow a new Participating Agency coming onto the HMIS a trial period of one year, and modify the

first year's cost share payment. If a Participating Agency wishes to be considered for a waiver due to capacity and or financial hardship, the agency will be required to provide a letter of appeal to the Steering Committee, describing the hardship. The Steering Committee will approve renewal waivers or reductions of the cost share payment on a case-by-case basis. The Executive Director of Community Council will sign both original agreements and Community Council will send one back to the agency, retaining the second.

Agency Partner Agreement Renewal

Participating HMIS agencies will have the option to renew their contracts annually. Annual cost share fees are due at the time of signing a new Agency HMIS Partner Agreement. New agencies may be prorated to the next renewal option date.

Termination of Participation

Occasionally a partner agency may need to voluntarily termination of participation in the HMIS system. Partner agencies struggling to maintain their partner agreement are encouraged to talk with Community Council HMIS lead agency staff to explore whether participation can be maintained with some modifications. If the Partner HMIS Agency is no longer running a program or project for which they were entering data into HMIS, or there are extenuating circumstances needing the agency to terminate participation, the following procedures are to be followed:

1. The Partner HMIS Agency informs the HMIS Program Manager in writing 30 days prior to their intention to terminate their agreement to participate in the HMIS. The letter must be written on agency letterhead and signed by the Partner Agency's Executive Director or authorized representative.
2. The Partner HMIS Agency makes sure all data in the HMIS database is current and run all reports needed prior to termination. If a need for reports from HMIS should arise after termination, the Partner HMIS Agency should contact Community Council.
3. It is recommended that all hard copy files of client information will be retained by the Partner HMIS Agency for three years after the client's date of program exit.
4. Community Council will terminate enrollment and revoke access of the Partner HMIS Agency's HMIS Users to the database. All Partner HMIS Agency specific information contained in the HMIS database will remain in the HMIS database.
5. No refund of cost share payments shall be made, regardless of whether the Partner Agency elects to terminate prior to the end of the current contract cycle.
6. Data collected for purposes of inclusion in the MO-503 Continuum of Care HMIS is jointly owned by the contributing HMIS organizations and the MO-503 Continuum of Care.

Involuntary termination of an agency may occur if Partner Agreement terms are violated.

HMIS Privacy and Security Notice

The Full HMIS Privacy and Security Notice describes in detail the clients' rights regarding HMIS. The Summary Notice summarizes these rights. This document must be edited by the HMIS Partner Agency with the agency's information.

The HMIS Privacy and Security Notice is a word document in which the HMIS Partner Agency's specific information will need to be inserted (i.e., name of agency, address, contact information).

- Insert the HMIS Partner Agency Name into the document heading.
- Insert the HMIS Partner Agency's contact information for which the client may contact to file a complaint.
- Insert the HMIS Partner Agency website information.
- The Full HMIS Privacy and Security Notice is required to be posted to the organization's website.
 - If the Partner Agency is also participating in HMIS in other Continuums, only 1 Notice is required to be posted, however, if using another CoC Notice, it must be equivalent to the MO-503 Notice.

The Summary HMIS Privacy and Security Notice may be edited with the organization's name and provided to each client. If the Client is provided with the Summary Notice, the Full Notice must be made available to clients upon request.

If an agency serves clients whose first language is not English, the agency must be able to provide a translated version of the HMIS Privacy and Security Notice or interpretation services.

HMIS Consumer Notice /Release of Information

The HMIS/HMIS Consumer Notice notifies the Client that the Partner Agency participates in HMIS and the reasons for collecting their information. It also makes the Client aware that they may request the Full Privacy Notice at any time.

The HMIS Consumer Notice must be posted in a manner in which it is visible to all clients. In addition, if an agency serves clients whose first language is not English, the agency must provide a translated version of the HMIS Consumer Notice or interpretation services.

HMIS Data Standards

The MO-503 follows the HUD requirements whereby all agencies participating in the HMIS are to collect a standard set of client information, known as the Universal Data Elements. There are additional Program-Specific Data Elements that are also required in order to produce the necessary community level aggregate reports.

Agencies administering publicly funding housing programs are responsible for knowing all the Universal and Program Specific Data Elements. The Department of Housing and Urban Development (HUD), the Department of Health and Human Services (HHS), and the Department of Veterans Affairs (VA) released the 2014 HMIS Data Dictionary and 2014 HMIS Data Manual on May 1, 2014, updating the 2004 HMIS Data and Technical Notice and the 2010 HMIS Data Standards Notice. The HMIS Data Standards outlined

in these two documents are revised periodically, and provide communities with baseline data collection requirements developed by HUD, HHS, and VA.

Our HMIS system is fully compliant on all program data collection and reporting requirements for HUD, HHS, and VA homeless programs, including SHP, ESG, RHY, PATH, and SSVF. We are also fully compliant with State Missouri Housing Development Commission housing reporting for the following grant programs: MHTF, Housing First, and ESG.

Accurate data collection is important for the coordination of services across multiple agencies, determining eligibility for client services, and generating reports from HMIS. A sample HMIS Coordinated Assessment is available for your use, and forms can be printed from the HMIS database for agency use.

- HMIS Partner Agencies and Users will collect all of the CoC required information for its clients and any additional data as required by each agency.
- HMIS partner agencies receiving federal or state housing funds are required to enter client level data in HMIS, and to receive referrals for housing services through the Community Coordinated Entry center.
- HMIS Users are required to ensure data quality of the information they collect, as stated in the HMIS User Policy and Responsibilities form. This is accomplished by reviewing the data the client has provided at the time of intake and correcting any identified data quality issues.

Protected Service Providers

Some Partner HMIS Agencies may be designated as “Protected” if they are covered by the Health Insurance Portability and Accountability Act (HIPAA) and/or serve a specific protected population such as:

- Domestic violence
- Sexual violence
- HIV/AIDS
- Alcohol and/or substance abuse
- Mental health

Any Partner HMIS Agency shall have access to identifying and statistical data on all clients in the HMIS database except for data input into the database by Protected Providers or programs. A Partner HMIS Agency designated as a Protected Provider can see the data it enters into the HMIS; however, other Partner HMIS Agencies do not have access to protected agencies data.

A designated “protected” Partner HMIS Agency shall have access to identifying and statistical data the Agency inputs into the HMIS database for clients served by that agency.

A designated “protected” Partner HMIS Agency shall not have access to identifying and statistical data input into the HMIS database for clients served by other designated “protected” Partner HMIS Agencies.

Domestic Violence shelters are not allowed to enter data into an HMIS; they are however, required to enter data into a comparable database in order to provide aggregate data to the Continuum of Care.

Technology Equipment Re-use and Disposal Policy

All computers (as well other electronic equipment that may store data, such as printers, copiers, tablets and fax machines, as applicable) no longer used in conjunction with HMIS will have their hard drives reformatted multiple times before being used again by the Partner Agency or anyone else.

Re-assigned Equipment

All computers (as well other electronic equipment that may store data, such as printers, copiers, tablets and fax machines, as applicable) used to access HMIS and which will no longer be used to access HMIS will have their **hard drives reformatted multiple times**.

Non-functional Equipment

All computers (as well other electronic equipment that may store data, such as printers, copiers, tablets and fax machines, as applicable) used to access HMIS and is now non-functional, must have their **hard drives pulled, destroyed, and disposed of in a secure fashion**.

The agency will destroy or reformat the technology equipment used for HMIS data collection according to the HMIS Computer Reuse and Disposal Policy.

Sheltered Point-in-Time Count

HUD requires every Continuum of Care to complete a Sheltered Point-in-Time count at least bi-annually. The MO-503 Continuum of Care has chosen to complete a Point-in-Time Sheltered Homeless Count annually. Community Council staff collects the required data on homeless individuals currently in Emergency Shelter, Transitional Housing, or being temporarily housed in a hotel or motel by an agency. Agencies enrolled in HMIS may have their data pulled directly from the system and Community Council verifies that data with the primary contact of the Partner HMIS Agency.

HMIS Participation Letters

Partner Agencies may request HMIS participation letters from the HMIS Program Manager for grant funding applications. This letter may be submitted with the Partner HMIS Agency's application for funding for various funding sources. HMIS participation letters will be provided for those agencies that are:

- Domestic violence agencies that have provided aggregate level data during the last two Point-in-Time Counts, and are able to generate quarterly aggregate demographic, service, and performance data comparable to HMIS Community reports
- Currently enrolled Partner Agencies in compliance
- Currently enrolled Partner Agencies not in compliance
- New Agencies that have started the HMIS enrollment process

Continuum of Care Meetings

Continuum of Care Meetings for MO-503 (St. Charles, Lincoln and Warren Counties) are held on the third Friday of every month, except July and December, in which provider agencies can come together to share ideas, problem solve, and address unmet homeless needs. In order to maintain a connection with the network of Service Providers, Partner HMIS Agencies are required to attend a minimum of one meeting each quarter. Some funders, such as the Missouri Housing Development Commission, have additional attendance requirements for their grantees. The success of the HMIS project in addressing homelessness in our community depends upon continued collaboration and discussion. Dates, times and locations for meetings in the upcoming year are sent to all Partner HMIS Agencies in December or January. Dates, times and locations also can be found on the Community Council Website.

Data Quality and Timeliness

Agencies, in the agency partner agreement, agree to timely data entry: “The agency shall consistently enter information into the HMIS database and shall strive for real time, or close to real-time data entry. ‘Close to real-time data entry’ is defined as within 3 working days of seeing the client.”

CaseWorthy is able to generate data quality, user log-in, and other data quality reports. Agencies are expected to monitor data entry for quality and timeliness on at least a monthly basis, and correct any data deficiencies. A rate of >5% in any universal or program required data field is considered poor data quality and must be corrected. Federal Continuum reporting requirements require data to be of high quality and complete for quarterly data uploads to the federal system. Community Council is required to submit data reports on behalf of the MO-503 Continuum of Care. If data is incomplete or poor quality, data uploads are rejected.

Wellness and Security Reviews

Community Council conducts a minimum of one formal assessment per year with each Partner HMIS Agency. Each February a “Wellness and Security Review” is conducted which allows the Community Council to identify any areas where the Partner HMIS Agency may require additional technical assistance to bring the agency into compliance with all Data and Security Standards. Additionally, we will assess privacy and security compliance. These visits also provide the opportunity for HMIS Users to provide and receive feedback, and assistance with software issues.

Quarterly Agency Wellness (Status) Report

Following the end of each calendar quarter, the Community Council will formally monitor the data input into the HMIS for data quality and timeliness by running quarterly reports for each Partner HMIS Agency. An Agency Wellness (Status) Report will be completed and sent to the designated Agency Compliance Monitor which will indicate any data quality or security issues discovered and steps the agency will need to take to address these. This is an important tool for the Partner Agency and an opportunity to correct any data entry errors in a timely manner.

Partner HMIS Agencies are encouraged to develop their own self-monitoring plan in an additional effort to ensure data quality. Data is required to be complete through the end of each quarter, by the 10th day of the following month. For example, first quarter data would be expected to be accurate through

March 31st, by April 10th. Second quarter data must be accurate through June 30th by July 10th. Third quarter data must be accurate through September 30th by October 10th. Fourth quarter data must be accurate through December 31st by January 10th.

Agency Wellness (Status) Reports may become public information to assist the community and Continuum to evaluate Continuum program performance. Publicly funded agencies requiring extra assistance to improve their data quality and timeliness may be charged additional fees by Community Council for HMIS staff time required to come into compliance.

Non-Compliance

In the event that there is significant or continued non-compliance by a Partner HMIS Agency, the Community Council will make formal notification to the Partner Agency Executive Director and/or Board of Directors:

- 1) A HMIS Non-Compliance Alert letter will go to the designated Partner Agency HMIS Compliance Monitor.
- 2) If the issue is not resolved in a timely manner, a second HMIS Non-Compliance Alert will be sent to the Executive Director, CEO, or COO (or other designated agency leader) indicating that the Agency is out of compliance and that this could put agency funding in jeopardy. Additional fees may be charged for staff time in assisting agencies come into compliance and improve data quality.
- 3) Finally, if necessary, a HMIS Non-Compliance Alert will go out to the agency's Board of Directors. Funders may be informed of agency noncompliance upon request.

It is the intention of the Community Council to afford agencies every opportunity to address and correct compliance issues in an effort to ensure data integrity and retain funding for our Continuum.

HIPAA

Partner Agencies who are considered a "covered entity" under the Health Insurance Portability and Accountability Act of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S. Department of Health and Human Services is required to operate in accordance with HIPAA regulations. On Jan. 25, 2013, the Department of Health and Human Services (HHS) published the "HIPAA Omnibus Rule," a set of final regulations modifying the Health Insurance Portability and Accountability Act (HIPAA) Privacy, Security, and Enforcement Rules to implement various provisions of the Health Information Technology for Economic and Clinical Health (HITECH) Act. The new rule took effect on March 26, 2013. However, covered entities had until Sept. 23, 2013, to comply with the Omnibus Rule. More information can be found at: <http://www.hhs.gov/ocr/privacy/>. HIPAA compliant Partner Agencies will be required to complete the HIPAA Attestation.

User Designation and Removal

Designating a new HMIS User

Individuals working on behalf of an agency (employee, contractor or volunteer) that will be accessing HMIS must be designated as a HMIS User. HMIS Users are designated by the Partner Agency's Compliance Monitor or the Executive Director or authorized representative.

Procedure:

- The Partner HMIS Agency's Executive Director or authorized representative will obtain the User Policy and Responsibility form, which must be completed and signed by the designated HMIS/HMIS User and the Partner Agency's Compliance Monitor. The original form must be kept on file at the Partner Agency, and a copy sent to the HMIS/HMIS Program Manager in order for the designated User to be registered for HMIS/HMIS training. It may be emailed to: **cgoebel@communitycouncilstc.org**.
- HMIS Users are allowed to access the HMIS after signing a User Policy and Responsibility form and completing the required training.
- HMIS Users are responsible for following the policies and procedures outlined in this document, and are responsible for collecting and entering accurate client data.

Removing HMIS Users

The Partner Agency must send written notification to the HMIS Program Manager within three working days identifying any HMIS User who will no longer be authorized to have access to the HMIS.

User-level Compliancy

Any HMIS User found to be out of compliance at the user-level will be given 30 days to come into compliance. If after 30 days the HMIS User is not found to be in compliance, the HMIS User's username and password will be suspended until such time the User comes back into compliance.

Training

HMIS/HMIS New User Training

All HMIS Users will be required to complete the necessary New User training requirements before obtaining access to the HMIS database. CaseWorthy New User and Confidentiality Training is available through the Community Council of St. Charles.

On-going User Training

CaseWorthy or Community Council will provide training on software updates and enhancements as needed.

Community Council will provide training on Continuum, HMIS, and Coordinated Entry policies and procedures regarding data entry as needed. Community Council will provide access to annual training on Ethics, Data Quality and Privacy and Confidentiality.

CaseWorthy or Community Council will provide Report and Data quality training, Funder Requirement training, and HUD Regulation training as applicable and necessary.

Client Information

Release of information/Consumer Notice

HUD's Homeless Management Information Data Standards of March 2010, updated in 2010 and 2014, allow for clients to be able to refuse answering some specific data questions. Partner HMIS Agencies are required to ensure that clients are aware of their right to refuse.

Policy: The Client has the right to refuse certain data to be entered into the HMIS database. The Partner HMIS Agency is required to have every client (Head of Household) it serves sign a Release of Information (ROI) form. The Head of Household is determined by the individual agency, its policies and target population. This form states the Client will receive services if the Client refuses to provide necessary information for HMIS, though the Client's eligibility to receive some specialized services may be inhibited by not participating in HMIS.

Client Authorization

Policy: Client Authorization expires 7 years from the date the Release of Information (ROI) form is signed. This is in keeping with Missouri Housing Development Commission and Federal (HUD) requirements on how long grant files are to be kept.

Client Access to Their Information

Policy: Clients have the right to a copy of their Universal and Program-Specific data contained within the HMIS.

Procedure: Clients submit a written request for a copy of their information contained within HMIS to the Partner Agency.

Partner Agencies are not required to print out any additional information, although it is optional and allowed.

Filing a Grievance

Policy: Clients have the right to file a grievance regarding potential violations of their privacy and rights regarding HMIS/HMIS participation. No negative action will be taken against a client for filing a grievance.

Procedure: A client must request the grievance policy from the Partner HMIS Agency and follow the HMIS agency's grievance process.

Should a Partner Agency receive a grievance, they must inform the Community Council of the grievance and its outcome.

If a client is not happy with the Partner HMIS Agency's handling of a HMIS grievance, the client has the right to contact the Community Council.

Technical Requirements

Minimal Requirements

All computers authorized to access HMIS must meet the following minimum requirements:

1. Internet Access: HMIS Partner Agencies need to have a modem (Internet) connection.
2. Firewall protection: It is required that all computers used to access the HMIS have up-to-date firewall protection.
3. Anti-virus protection: All computers used to access the HMIS database require up-to-date anti-virus protection software. Anti-virus protection software should be set to update automatically and should be checked periodically to ensure it is current.
4. Log-On Password Protection: All computers used to access the HMIS database require log-on passwords.
5. Password protected screen-saver. All computers used to access the HMIS require an up-to-date password protected screen-saver. The screen-saver should be set to turn on every 2-3 minutes when the computer is not in use.

Workstation Security Procedures

Workstation monitors are to be placed in such a manner as to prohibit limit the ability of unauthorized individuals from viewing the data on the screen. When unable to achieve this, the use of a privacy screen on the monitor is allowed.

If it is necessary to write down your HMIS username and/or passwords, it must be stored in a secure location such as a locked drawer or cabinet. This information should not be placed under a keyboard, monitor, or in any location where non-designated HMIS users may find it. Do not share your login information with anyone.

When you are away from your computer, log out of the HMIS and log out of your workstation.

Technical Support

Community Council is the best resource for obtaining specific database information and help with troubleshooting. Normal business hours are 8:00am-4:00pm Monday through Friday, except holidays.

The Community Council of St. Charles County administers the MO-503 HMIS. Participating HMIS users are encouraged to contact the Program Manager for Technical Assistance. If unable to directly resolve the matter, the Program Manager will facilitate assistance from CaseWorthy.

The Community Council HMIS team uses the web based JIRA helpdesk to track user support requests and their resolution. If you are not registered with a JIRA account, or need training on how to submit a JIRA ticket, please contact Chas Rodeman at crodeman@communitycouncilstc.org

If an HMIS partner agency receives funding to provide new services, it is the agency responsibility to complete a new grant or project set-up form through the JIRA helpdesk, with the information needed by the HMIS team to set-up the project correctly. It is important that this be done as soon after the grant award as possible, for best data quality and accurate reporting.

The HMIS Support team can be reached at 636-978-2277.

HMIS Website

Information about HMIS can be found on the Community Council website under Initiatives: www.communitycouncilstc.org

Research Policy

The HMIS rules protect the confidentiality of “protected personal information,” or PPI. PPI is any information maintained by a homeless service organization that:

- Identifies, directly or indirectly, a specific individual;
- Can be manipulated by a reasonably foreseeable method to identify an individual; or
- Can be linked with other available information to identify an individual.

PPI can be disclosed externally or used internally by the homeless service organization only if the use or disclosure is permitted by law and the use or disclosure is described in the organization's privacy policy.

One of the permitted uses of PPI is for academic research (HMIS Privacy Standard 4.1.3).

The use of PPI from the MO-503 HMIS for academic research is only permitted if there is a written research agreement authorized by the MO-503 Continuum of Care, between the Lead Agency (Community Council of St. Charles County) and the researcher. The research agreement must establish rules and limitations for processing and maintaining the security of PPI, provide for its return or disposal at the end of the research, restrict additional use or disclosure, and require the data recipient to agree to abide by the conditions.

FORMS

All forms referenced in this document are available from Community Council.

Agency HMIS Partner Agreement & renewal form

This form is an agreement between a participating agency and the Community Council of St. Charles County (The Lead HMIS agency and the agency that received the grant from HUD to create the HMIS). The form describes the mutual responsibilities in connection with the use of the HMIS database. It spells out many of the duties of the Partner HMIS Agency as a whole toward maintaining the confidentiality of client information. This partner agreement is renewed annually.

HMIS Privacy and Security Notice

The HMIS Privacy and Security Notice for your agency describes in detail the clients' rights regarding HMIS.

User Policy and Confidentiality Agreement form

Individuals working on behalf of an agency (employee, contractor or volunteer) that will be accessing HMIS must be designated as a HMIS User. HMIS Users are designated by the Partner Agency's HMIS Compliance Monitor or Executive Director or authorized representative. The form describes the duties of HMIS Users in keeping client information confidential and maintaining the security of the HMIS database.

Consumer Notice/Release of Information(ROI) forms

By signing the Release of Information(ROI) Form, the client understands that any information he/she shares with an agency participating in HMIS is kept confidential and that only those authorized to input data in HMIS can view their personally identifying information. By signing this form, the client also understands he/she has the right to refuse to answer a question in HMIS and, furthermore, that if he/she decides at a later date they no longer want their information to be in HMIS, that he/she can request it be removed.

Employee Privacy Acknowledgement form

The Employee Acknowledgement is required to be signed by each staff member (including

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Employees, volunteers, affiliates, contractors and associates) who may come in contact with Data from the HMIS, either hard copy or otherwise, acknowledging receipt of a copy of the HMIS privacy policy and pledging to comply with said privacy policy.

New Agency Application Process

The New Agency Process details the requirements the step-by-step process for a new agency to come onto the HMIS.

CaseWorthy New Grant (or Project) set-up form

If an HMIS Partner agency receives a new grant, or needs a new project set-up in CaseWorthy, fill out this form, and attach it to a JIRA helpdesk support ticket, with a request for grant or project set-up.

Business Associate Agreement for HIPAA

HIPAA compliant Partner Agencies will be required to complete the Business Associate Agreement.