SNOHOMISH COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Policy and Procedures Manual

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What is Snohomish County HMIS?

Snohomish County Homeless Management Information System (HMIS), is designed for agencies that provide housing and services to homeless people. Counties or Continuum's of Care are required by the U.S. Department of Housing and Urban Development (HUD) and by the Homelessness Housing and Assistance Act (RCW 43.185C) to operate an HMIS and meet all requirements. Programs targeted for participation include outreach services, supportive services for homeless persons, homelessness prevention and intervention, emergency shelter, transitional housing, and permanent supportive housing. Beyond meeting the HUD requirements, it is our goal that HMIS assist agencies in recording and tracking client service data and generating reports, providing information helpful to funders, planners and policy makers, and to increase the coordination among agencies.

Mission Statement: The mission of Snohomish County HMIS is to identify gaps in homeless services delivery, provide reporting resources for homeless services providers and funders, reduce duplicate efforts for both providers and recipients of homeless services, and facilitate access to services for persons who are homeless or at imminent risk of becoming homeless.

The benefits of the HMIS are to:
• Inform government and the community about the extent and nature of homelessness in Snohomish County.
• Assist in numerous planning processes including but not limited to the 10 year plan to End Homelessness, Continuum of Care planning, the Gates Initiative and the Consolidated Plan.
• Enable agencies to have accurate information about the clients they serve.
• Provide information on successes and challenges of homeless programs.
• Prepare informational reports for funders.
• Facilitate funding needed for housing and other related services, thereby ultimately benefiting homeless households.
• Enable the participating agencies and the community to understand client needs, resources and gaps through the use of aggregated data.
• Help programs identify processes that are problematic, support redesign efforts, and improve the quality of the services provided by the organization.

Benefits of using the HMIS:
• Automated reporting – complete monthly, quarterly, and annual reports for key funders (including local funders, the State & HUD) with training.
• No technical expertise or IT staff required – the HMIS is centrally maintained and training is provided for all your staff by the HMIS Administrators

- Designed to meet HUD, HIPAA, and local provider needs
- Captures changes in clients' needs over time
- Enables client data sharing between HMIS agencies when programs and clients agree, eliminating redundant intake forms for clients and service providers.

STAGES OF IMPLEMENTATION

STAGE 1: INITIATING AGENCY HMIS PARTICIPATION (FOR NEW AGENCIES)
1. Complete the training on use of forms (Consent and ROI, Client Privacy Rights).
2. Complete all HMIS computer training.
3. An Internet connection—DSL or Cable with static IP address is secured for the agency.
4. An Agency Site HMIS Contact is designated by Snohomish County HMIS Administrators.
5. Agency completes and submits to Snohomish County Human Services Department all participation agreement materials including:
   - HMIS Agency Partner Agreement
   - Signed HMIS User Agreement form for each individual agency end-user
6. The Agency Site HMIS Contact designates agency staff to receive access to the system.
7. The HMIS Administrators return to site for a follow-up to assist the Agency Site HMIS Contact in initial operative tests on the program's equipment and completeness of security checklist (if needed).

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

STAGE 3: SYSTEM FULLY INTEGRATED IN DAILY OPERATION
1. Agency specific training is provided on querying reports and additional functions accessed in Client Track.
2. Participating organization begins using the information for internal evaluation and reporting requirements.

MAINTENANCE OF DATA AND ONSITE COMPUTER EQUIPMENT

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

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

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

Responsibilities:

The partner agency staff or designee will be responsible for the maintenance and disposal of on-site computer equipment and data used for participation in the HMIS Project as follows:

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

- **Backup:** Data Systems International is responsible for supporting a backup procedure for the server on which the HMIS database resides.

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

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

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

Minimum Workstation Requirements: User's computers must have, at a minimum, a DSL connection or faster connection to the internet. Client Track 2012 is designed to run on Microsoft Internet Explorer version 7.0 and higher. Operation of Client Track is dependent on the browser, not on the operating system installed on the computer.

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

Roles

The HMIS Administrators are responsible for:

- System Administration
- Authorizing usage and access to the HMIS.
- Limiting access to users who need access to the system for technical administration, data entry, editing of client records, viewing of client records, report writing, administration of other essential activity associated with carrying out HMIS responsibilities.
- Developing reports and presenting data.
- Mining the database to respond to the information needs of participating organizations, community stakeholders and consumers.
- Documenting work on the database and in development of reports/queries.
- Provision of technical assistance as needed with program sites.
- Providing training to participating organizations on policies and procedures, system use, authorizing access to the system including set-up, in response to questions from users, and in response to network and system functionality questions.
- Coordinating technical support for the system.
- Communicating with participants regarding problems with entry and to support data quality.
- Monitoring agency participation including timeliness and completeness of entry.
- Communicating any planned or unplanned interruption in service.
- Reviewing and communicating as needed pertaining to the agencies' bi-monthly quality assurance reports.
- Auditing Policy and Procedure compliance.

Data Systems International is responsible for:

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

All Snohomish County users and County Staff users are responsible:

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

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HMIS Snohomish County CoC Partners:
Bridgeways
Cascade Prison Ministry
Catholic Community Services of Western Washington
Cocoon House
Community Health Center
Compass Health
Domestic Violence Services of Snohomish County
Everett Gospel Mission
Friends of Youth
Housing Hope
The Interfaith Association of Northwest Washington
Mercy Housing Northwest
Monroe Gospel Women's Mission
Snohomish County Human Services Department
Snohomish Health District
The Salvation Army
Tulalip Tribes
Volunteers of America
Workforce Development Council Snohomish County
YWCA

Participation Requirements

Reminder:

Agencies may not use the HMIS system, participation or data as a reason to deny services or housing to a client.

Policy: Participating agencies agree to use the following procedures in implementing their HMIS system at an agency level.

HMIS digital certificate: Downloaded to computers that have been approved by the HMIS Administrators (Placeholder: we will be seeking the use of a digital certificate from our vendor to further comply with Public Key Infrastructure (PKI) requirements.

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

The basic training provided to participating agencies will, at minimum, include the following:

- Introduction to the HMIS
- Review of applicable policies and procedures, including relevant security policies
- Connecting to the Internet
- Logging on to the HMIS
- Entering client information including data from Intake, Ongoing Assessment, and Discharge
- Ensuring good quality data
- Overview of system administrative functions
- Entering and updating information pertaining to the participating agency
- Oversight of data quality
- Sessions will be designed and coordinated by County HMIS Administrators.
- Advanced training will be provided as requested by individual agencies, subject to availability.

HMIS User Agreement

- Each user must sign a Snohomish County HMIS User Policy, Code of Ethics and Responsibility Statement user agreement stating full understanding

of system rules and protocols before receiving a username and password to access the system. These agreements will be reviewed annually.
- Each user must receive training in the use of the HMIS system from an HMIS Administrator.
- Agencies will request the number of users accessing the HMIS system; each user must have his or her individual username and password and must not share that information with anyone else. Sharing is strictly prohibited.
- Agency directors must approve each individual user from their agency.
- Access permission is contingent on continued employment at the agency, and will be terminated immediately if the user is no longer employed by the agency.
- Agency will notify an HMIS Administrator immediately if a user terminates employment in an effort to revoke access rights.

Data Protocols:
- Only authorized users may view or update client data.
- Agencies must have signed HMIS Consent and Release of Information (ROI) forms prior to data entry.
- Each adult member of a household that is receiving housing or services will be expected to sign the HMIS Consent and ROI.
- Consent for data entry for minors will be provided by the parent/guardian.
- If the client refuses entry of identified information into HMIS, the Agency must have a mechanism in place to track the entry of de-identified information.
    o Additionally, the agency will only use the first name, last name combination of "anonymous, anonymous," and nothing else for de-identified clients.
- A client always has the right to view his or her own data and request corrections.

Aggregate Data Sharing and Release:
- Each agency, in partnership with Snohomish County, owns the client data for housing and/or services provided by them.
- Agencies are encouraged to use their own HMIS data for public relations, reporting and funding as long as client confidentiality is maintained.
- Aggregate HMIS homeless data (not client specific) will be published at an interval (TBD) by Snohomish County HMIS. Any agency may use published HMIS data.
- Snohomish County staff may use HMIS data for planning, research and analysis, reporting, and grant writing processes including the Continuum of Care application, the Consolidated Plan, HUD reporting, etc., and may reconcile and release aggregate data.

- Client confidentiality needs to be upheld, and a signed release must specify that the client agrees to have their data shared with other HMIS partner agencies.

Participation Agreement and Standards:

Agencies are required to sign a participation agreement stating their commitment to adhere to the policies and procedures for effective use of the system and proper collaboration with HMIS.

- Universal and Program Data Elements are to be entered into HMIS system within one week of a residential intake. (Residential = emergency shelter stay, transitional housing stay, permanent-supportive housing stay, prevention and rapid re-housing subsidy assistance)
- Additional Services and program-specific data is to be entered into the HMIS system within one week of the client exiting the housing stay or receiving a services only service.
- Quality assurance reports must be generated monthly to verify data quality.
- Client's identified information entered in HMIS must be based on the HMIS Consent and Release of Information and cannot be based on Agency policy.

Privacy Protection Protocols:

HMIS Consent and Release of Information (ROI) forms: These must be signed by clients to authorize the entry and/or sharing of their personal information electronically with other participating agencies through the HMIS where applicable.

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

Individual Data Sharing, Release and Confidentiality: The HMIS Consent and ROI do not authorize the agency to release information about a client from the database unless the form specifies which agencies the client authorizes.

Grievance Procedure:

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

Security - Partner Agencies

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

Physical Security: Agencies must develop rules to address unattended workstations and physical access to workstations which minimize the risk of confidential data being accessed by unauthorized persons. Monitors displaying client data should be oriented to minimize viewing by unauthorized people.

Access to data:
A. **User Access:** Users will only be able to view the data entered by users of their own agency or shared client records. Security measures exist within the HMIS system which restricts agencies from viewing each other's data without permission.
B. **Raw Data:** Users can perform reporting functions which will address each agency and programs' individual data.
C. **Agency Policies Restricting Access to data:** Each partner agency must establish internal access to data protocols. These policies should include who has access, for what purpose, user account sharing and how they can transmit this information. Other issues to be addressed include storage, transmission and disposal of these data.

Appendix A
HUD HMIS Data elements

	Subjects			When Collected				
	All Clients	All Adults	All Adults & Unaccompanied Youth	Initial Program Entry	Every Program Entry	At least once annually during program enrollment	Every Program Exit	When Services Provided
UNIVERSAL DATA ELEMENTS								
Name	x			x				
SS#	x			x				
Date of Birth	x			x				
Race	x			x				
Ethnicity	x			x				
Gender	x			x				
Veteran Status		x			x			
Disabling Condition	x				x			
Residence Prior to Program Entry			x		x			
Zip Code of Last Permanent Address			x		x			
Housing Status	x				x			
Program Entry Date	x				x			
Program Exit Date	x						x	
PROGRAM-SPECIFIC DATA ELEMENTS								
Income and Sources	x				x	x	x	
Non-Cash Benefits	x				x	x	x	
Physical Disability	x				x	x	x	
Developmental Disability	x				x	x	x	
Chronic Health Condition	x				x	x	x	
HIV/AIDS	x				x	x	x	
Mental Health	x				x	x	x	
Substance Abuse	x				x	x	x	
Domestic Violence			x		x			
Destination	x						x	
HUD ADDITIONAL PROGRAM DATA ELEMENTS								
Employment					x		x	
Education					x		x	
General Health Status					x		x	
Pregnancy Status					x			
Veteran's Information					x			
Children's Education					x		x	
Reasons for Leaving							x	
Services Provided								x

Appendix B
Data Quality Plan

Overview:

In order for the Continuum to have reliable data for analysis and reporting, the County and Partnering Agencies must develop a document that outlines program and system-level expectations for data collection and entry into the HMIS. This document, called a Data Quality Plan, will be used as the basis for developing goals for achieving quality data. To achieve these goals, we must develop, implement, and monitor a data quality plan that outlines goals, tasks, task leads, and timelines and regularly assesses the progress of both programs and the system as a whole towards meeting the overall data quality benchmarks.

Components:

At a minimum, the data quality plan will include the following:

1. Timeliness: entering data in a timely manner can reduce human error that occurs when too much time has elapsed between the data collection and the data entry. The individual doing the data entry may be relying on handwritten notes or their own recall of a case management session, a service transaction, or a program exit date; therefore, the sooner the data is entered, the better chance the data will be correct. Timely data entry also ensures that the data is accessible when it is needed.
    a. The average time between program entry and data entry are as follows:
        i. Emergency Shelter – 11 days
        ii. Transitional Housing – 14 days
        iii. Permanent Supportive Housing – 30 days
        iv. HPRP – 15 days
    b. Benchmark –
        i. Emergency Shelter – 7 days
        ii. Transitional Housing – 7 days
        iii. Permanent Supportive Housing – 7 days
        iv. HPRP – 7 days
    c. Method for obtaining and tracking this information: Average length of time between the program entry date and the date the enrollment record was created.
2. Completeness
    a. General: partially complete or missing data (e.g. missing the birth date, disability or veteran status) can negatively affect the

ability to provide comprehensive analysis in reporting. Incompleteness also affects our Continuum's ability to sift duplicate client level data.

 i. For current averages and system-wide benchmarks, see table below:

Data element	Records with no values	Records with no values benchmark	Records where value is refused/unknown	Records where value is refused/unknown benchmark
Data pulled from 04/01/2011 to 03/31/2012				
Name	0.0%	0%	13.8%	8%
SS#	0.4%	0%	54.6%	40%
Date of Birth	0.0%	0%	5.0%	3%
Race	0.0%	0%	17.0%	10%
Ethnicity	0.0%	0%	15.0%	10%
Gender	0.0%	0%	2.0%	2%
Veteran Status for adults	4.0%	0%	3.5%	2%
Disabling Condition for adults	4.0%	0%	2.6%	2%
Residence Prior to Program Entry	4.0%	0%	8.0%	2%
Zip Code of Last Permanent Address	4.0%	0%	21.0%	15%
Housing Status	4.0%	0%	2.0%	1%

 ii. For benchmarks by program type, see attached data quality monitoring plan.

 b. Bed utilization rates: looking at a program's bed utilization rate or the number of beds occupied as a percentage of the entire bed inventory, is an excellent barometer of data quality. It is difficult to measure data quality if the utilization rate is too low (below 65%) or too high (above 105%). Low utilization rates could indicate that the residential facility was not at or near capacity, but it could also mean the HMIS data is not being entered for every client served. High utilization rates could mean the bed provider was over capacity, but it could also mean the program has not properly exited clients from the system.

3. Accuracy

 a. General: the purpose of accuracy is to ensure that the data in HMIS is the best possible representation of reality as it relates to homeless people and the programs that serve them. All data entered in HMIS shall be a reflection of information provided by the client, as documented by agency staff, or otherwise updated

by the client and documented for reference. Recording inaccurate information is strictly prohibited.

b. Consistency: consistency benchmarks will include developing companion documents that describe the intake forms, data entry methods, wording of questions, and intake and data entry training schedules. These documents will be cross-referenced with the most current HUD HMIS Data Standards.

4. Monitoring: the frequency of monitoring will be done on a bimonthly basis. Snohomish County will adopt the HUD data quality monitoring tool.

5. Other components

a. Access to the Data Quality Plan: the data quality plan will be posted to the Snohomish County HMIS website.

b. Access to Data Quality Reports: OCHS will make available by the 15 of every other month, data quality reports for the purposes of facilitating compliance review by participating agencies and any such CoC Data Committee.

c. Data Correction: participating agencies will have 10 days to correct data. The HMIS lead agency will make available revised data quality reports for posting to the HMIS website by the 30th of every other month.

d. Bimonthly Review: OCHS will review participating agency data quality reports for compliance with the data quality benchmarks. OCHS staff will work with participating agencies to identify training needs to improve data quality.

e. Public Review: On a bimonthly basis, the HMIS lead agency will post agency aggregate data quality reports to the HMIS website.

f. CoC Review: OCHS staff will provide brief updates on progress related to the data quality benchmarks.

g. Enforcement: for agencies that fail to meet the data quality benchmarks, OCHS may ask the agency to submit a written plan that details how they will take corrective action.