

Toledo Homeless Management Information System (HMIS)

Consolidated Policies and Procedures

Purpose of HMIS

The purpose of the Toledo HMIS project is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in support of the Toledo-Lucas County Continuum of Care's CASE Plan to prevent, reduce, and eliminate homelessness.

We do this by assisting homelessness service providers in generating reports to the U.S. Department of Housing and Urban Development, the Toledo Lucas County Continuum of Care, and other funders, as well as streamlining and consolidating their internal tracking and record-keeping requirements.

I. Roles and Responsibilities

1. Project Management

The Toledo Lucas County Homelessness Board (TLCHB) is responsible for the HMIS project under the auspices of a TLCHB/HMIS Technology Director. While the HUD HMIS grant is still held by FOCUS, the Technology Director will be employed through FOCUS and supervised by TLCHB; after the grant is moved to TLCHB, the Technology Director will be both employed and supervised by TLCHB.

2. Project Staffing

The Technology Director has primary responsibility for coordination and administration of the Toledo HMIS and reports to the TLCHB Executive Director. At a minimum, one additional person will be employed full-time as part of the HMIS staff.

3. Contributory HMIS Organizations

Any agency, group, or other entity that has completed an Agency Agreement with the Technology Director is a Contributory HMIS Organization (CHO). All CHO's must abide by all policies and procedures outlined in this manual, which are subject to change. CHO's must complete a CHO Agreement with the Technology Director on an annual basis. CHO's with expired CHO Agreements may have their End User accounts locked or removed to maintain the security, confidentiality, and integrity of the system. CHO's are responsible for the conduct of their End Users and the security of End User Accounts.

4. Project Agency Administrators

Each CHO will designate an HMIS Agency Administrator to serve as primary contact between the Technology Director and the CHO, and each HMIS Agency Administrator must have a valid email address with the CHO. Each CHO should choose its HMIS Agency Administrator and send that person's name and contact information to the Technology Director. Changes to that information should be promptly reported to the Technology Director.

5. HMIS Advisory Committee

The Technology Director will convene a committee to advise the project's operations, policies, and procedures and provide feedback on a regular basis. The Technology Director will seek out particularly skilled individuals whose breadth and depth of expertise is well-suited to the project.

6. HMIS End Users

In addition to an HMIS Agency Administrator, CHO's may designate other individuals to access the system on their behalf, and CHO's are encouraged to use ServicePoint as their primary tool for client and service tracking, case management, and operational reporting. The Technology Director will work with

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CHO's to determine the appropriate User Access Level designation for each End User.

There is no upper limit to the number of End Users each CHO may authorize, but Toledo HMIS may assess participation fees to recover the cost of ServicePoint licenses beyond that of the HMIS Agency Administrator.

All End Users, including HMIS Agency Administrators and HMIS staff, must complete an End User agreement with the Technology Director on an annual basis. End User accounts with expired End User Agreements may be locked or removed to maintain the security, confidentiality, and integrity of the system.

7. **Communication**

General communications from the Technology Director will be directed toward Agency Administrators. Specific communications will be addressed to the person or people involved. The Toledo Technology Director will be available via email, phone, and U.S. mail. The ServicePoint Newsflash feature will also be used to distribute HMIS information.

Participating CHO's are responsible for communicating needs, questions, and concerns regarding the Toledo HMIS directly to the Technology Director.

8. **System Availability**

Bowman Systems will provide a highly available database server and will inform Toledo HMIS staff in advance of any planned interruption in service. Whenever possible, if the database server is unavailable due to disaster or routine maintenance, Toledo HMIS staff will inform End Users of the cause and duration of the interruption in service. The Technology Director will log all downtime for purposes of system evaluation.

9. **Client Grievances**

Clients will contact the CHO with which they have a grievance for resolution of HMIS problems. CHO's will provide a copy of the Toledo HMIS Policies and Procedures Manual upon request, and respond to client issues. CHO's will send written notice to the Technology Director of any HMIS-related client grievance. The System Director will record all grievances and will report these complaints to the HMIS Advisory Committee.

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II. Security and Privacy Plan

1. Security Officer

Each CHO must designate an HMIS Security Officer to be responsible for ensuring compliance with applicable security standards. The Security Officer need not be an End User. The Security Officer must be an employee of the CHO. For any CHO with no employees, the Security Officer must be the President, Chair, or other top-level representative responsible for the CHO.

2. Workforce Security

Each CHO must have a workforce security policy that includes conducting a criminal background check on its Security Officer and on any users with Agency Director level access or greater. Criminal background checks must be completed at least once every five years. On request, CHOs must certify to Toledo HMIS when the most recent criminal background check has been completed for each applicable staff member. The background check must include local and state records; CHOs are strongly encouraged to include federal records as well.

3. Security and Privacy Awareness Training

Toledo HMIS will conduct a security and privacy awareness training on an annual basis, which will be required for all End Users and Security Officers. This training will cover relevant statutory and regulatory requirements, local policies, and best practices for HMIS security and privacy.

4. Disaster Recovery Plan

In the event of a disaster involving substantial loss of data or system downtime, Toledo HMIS will contact CHO Security Officers by phone or email within one business day to inform them of the expected scale and duration of the loss or downtime. Toledo HMIS will continue to inform CHO Security Officers as new information becomes available about the scale and duration of lost data or system downtime. In the event that loss of data is expected to exceed three business days of activity or system downtime is expected to exceed 24 hours, Toledo HMIS will begin to disclose estimates of loss and downtime to the public as well.

5. Annual Security Review

All CHOs must undergo an annual security review, which includes, at a minimum, completion of the following security checklist:

- Proper display of “Purpose of Data Collection” notice
- Workstation security as described in Section 10
- Proper completion and logging of “Consent for Network Data Sharing” form
- Certification of most recent background check for applicable personnel as described in Section 2

6. Contracts and Other Arrangements

Toledo HMIS must retain copies of all contracts and agreements executed as part of the administration and management of HMIS or required to comply with the requirements of these policies.

7. Allowable Use and Disclosure of HMIS Data

Toledo HMIS will only collect client data relevant to the delivery of services to people experiencing homelessness, a housing crisis, or housing instability in Lucas County, Ohio.

a. Service Delivery

Client-level data may be stored and retrieved by CHOs when relevant to assessing program eligibility, providing services, and making corrections.

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b. Reporting to Program Funders

Reports of client data in aggregate may be generated to satisfy the reporting requirements of certain program funders, including but not limited to:

- U.S. Department of Housing and Urban Development Emergency Solutions Grant Program;
- U.S. Department of Housing and Urban Development Continuum of Care Program; and
- State of Ohio Development Services Agency.

c. Planning and Analysis

Reports of client data in aggregate may be generated to improve planning and analysis of homelessness, housing crises, and related issues. These include local Continuum of Care planning efforts as well as national reports such as the Annual Homelessness Assessment Report to Congress, Point-in-Time Counts, and the Housing Inventory Chart.

d. Coordinated Assessment

Reports of client data in aggregate, bed lists, or other availability may be generated to facilitate use of a Coordinated Assessment system.

e. Documentation of Homelessness

Client shelter stay records in HMIS may be used by CHOs as documentation of homelessness.

f. Data Quality

Reports of client data in aggregate may be generated to assess and improve the quality of data being entered.

g. Troubleshooting

Toledo HMIS and Bowman Systems may from time to time access individual client-level data in order to manage system configuration, conduct special projects, troubleshoot system issues, and provide technical assistance.

h. Prohibition on Use of Identifiable Client Data

Under no circumstances will reports be generated or data transferred with readable or retrievable client-level identifying data.

i. Data Integration and Warehousing

Client-level data may be exported and transferred from the designated Toledo HMIS system for use in research within an interagency data warehouse. Client-level data exported in this fashion will be accompanied by an obfuscated hash value to be used as a key for integrating data from multiple sources.

8. Openness of Data

Client-level data in HMIS will be designated as either Open or Closed. With the exception of Client Identifiers, which are searchable in order to minimize duplication of client records, no client-level data will be shared within the system unless a Client Consent to Network Data Sharing/Release of Information (ROI) is logged in ServicePoint, even if the data is designated as Open. Even if an ROI is logged, Closed data is never shared.

a. Client Identifiers

- First and Last Name

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- Date of Birth
- Social Security Number
- Gender

b. Data Elements which are Open by Default

- First and Last Name
- Date of Birth
- Social Security Number
- Gender
- Race
- Ethnicity
- Veteran Status
- Residence Prior to Program Entry
- Last Permanent ZIP Code
- Housing Status
- Household Membership
- Program Entry Date
- Program Exit Date
- Income Amounts & Sources
- Non-Cash Benefit Amounts & Sources
- Reason for Leaving
- Destination
- Employment
- Education
- General Health
- Veteran Details
- Children's Education
- Primary Reason for Homelessness/Threat to Housing Stability

c. Data Elements which are Closed by Default

- Disabling Condition
- Physical Disability
- Developmental Disability
- Chronic Health Condition
- HIV/AIDS Diagnosis
- Mental Health Condition
- Substance Abuse
- Domestic Violence
- Pregnancy
- Case Plan Notes
- Case Plan Goals
- Case Plan Action Steps
- Case Plan Follow-Up Plans
- Service Needs
- Service Referrals
- Self-Sufficiency Matrix measurements

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- Service AIRS Taxonomy Code
- Service Start and End Dates
- Shelter Bed Assignment
- Service Amount or Units of Assistance
- Service HPRP Assistance Category
- Service Funding Source
- Service Current or Arrears Designation

9. Informed Client Participation

CHOs will display a Purpose of Data Collection Notice at all locations where HMIS data are collected from clients, and educate clients as to the purpose and scope of data collected and entered into HMIS. CHOs will request and retain written consent from clients for their data to be shared as described in Section 8. Toledo HMIS will provide a standard HMIS Consent for Network Data Sharing form to all CHOs for this purpose.

a. Logging in ServicePoint

Consent for Network Data Sharing forms should be logged in ServicePoint even in cases where the client declines permission for data to be shared.

b. Anonymous Records

Clients may request their Client Identifiers be omitted from entry into ServicePoint. In these cases, an anonymous record may be used and all other data should be entered.

10. Workstation Security

At a minimum, the primary workstation used by each End User to log in to ServicePoint should be configured to meet the following best practices:

- a. Password-protected log on for the workstation itself;
- b. Password-protected (aka locked) screensaver after five minutes or more of inactivity;
- c. Operating system updated with manufacturer's latest patches at least weekly;
- d. Ports firewalled;
- e. Using either Internet Explorer 8, Firefox 3, Chrome 8, or Safari 3, or later versions of these browsers; and
- f. Systems scanned at least weekly for viruses and malware.

Toledo HMIS may provide recommendations or advise in pursuing these best practices, but proper workstation configuration remains the responsibility of each CHO.

11. End User Accounts

The Technology Director will provide an End User Account username and initial password to each authorized End User. End User Accounts are assigned on a per-person basis, rather than to a particular position or role. End User Accounts are not to be exchanged, shared, or transferred between personnel at any time.

a. CHO Authority to Demand Usernames and Passwords

Under no circumstances shall a CHO demand that an End User hand over his or her username and password. CHOs shall inform the Technology Director of any changes in personnel or other requests to revoke or transfer accounts.

b. End User Password Security

End User Account passwords must be changed every forty-five (45) days. End Users may keep passwords written down and stored in a purse, wallet, or other container kept on their person at all times.

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Passwords should never be written on any item left in an office, desk, or other workspace, and passwords should never be in view of another person.

c. End User Inactivity

End Users who have not logged into the system in the previous 90 days will be flagged as inactive.

Inactive End Users may have their ServicePoint accounts locked or removed to maintain the security, confidentiality, and integrity of the system.

12. Prohibition on Client-level Data from Victim Services Providers

Programs which are primarily for survivors of domestic violence, dating violence, sexual assault, and stalking are prohibited from contributing client-level data into the designated HMIS System. However, these programs must record client-level data within a comparable internal database and be able to generate aggregate data for inclusion in reports as described in Section 7.

13. Reporting Security and Privacy Incidents

Any End User or Security Officer suspecting violations of Security and Privacy policies or other should report incidents in writing. Reports should include, at a minimum, the date, time, location, and personnel involved in the incident, along with a description of the suspected violation.

a. Chain of Reporting

End Users should report issues first to their CHO's designated Security Officer within one business day. Security Officers, in turn, should report the issue jointly to the CHO director and Toledo HMIS Staff within one business day.

b. Public Disclosure of Security Incidents

If a CHO is found to have committed a major violation as described in Section 14, the incident will be disclosed to the public along with the sanctions instituted in response

14. Sanctions for Violations

a. Minor Violations

Minor violations include but are not limited to:

- End User or Security Officer absence at a required quarterly End User meeting or annual Security and Privacy Awareness Training, unless prior arrangements have been made for receiving missed training
- Logging Consent for Network Data Sharing forms (aka ROIs) in ServicePoint whose start and end dates do not match those indicated on the form
- Workstations non-compliant with up to two Workstation Security items described in Section 10

The sanctions for minor violations are dependent on the number of minor violations by the CHO within a 24 month period.

i. First violation

1. A letter documenting violating event and involved personnel will be sent to CHO from Toledo HMIS and kept on-file with Toledo HMIS. CHO must submit to Toledo HMIS a written plan for corrective action, including any internal actions taken against employee who violated policy, within 10 business days and complete the corrective action within 30 days.

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ii. Second violation

1. A letter as described in “First violation” above.
2. Toledo HMIS will conduct a mandatory training session on security and privacy policies for the CHO in question. This training must be attended by all end users, the CHO’s Security Officer, and the Security Officer supervisor or CHO executive director. In organizations where the Security Officer is the executive director, the training must be attended by the chair or president of the CHO’s board of directors.

b. Major Violations

Major violations include but are not limited to:

- Three or more minor violations within a 24 month period
- Failure to submit a written plan for corrective action for minor violations within 10 days
- Failure to complete corrective action for minor violations within 30 days
- Failure to conduct a criminal background check as described in Section 2
- Failure to participate in an Annual Security Review as described in Section 5
- Workstations non-compliant with three or more Workstation Security items as described in Section 10
- Failure to report security and privacy incidents as described in Section 13
- Granting permission for Network Data Sharing (aka ROIs) in ServicePoint when a client has not granted permission for the same
- Transmitting Client Identifiers in plain text via unsecured or unencrypted e-mail

The sanction for a major violation is:

- A letter as described in “First violation” for minor violations above;
- A mandatory training as described in “Second violation” for minor violations above; and
- The End User violating the policy or procedure will be prohibited from accessing ServicePoint or participating in HMIS data collection for 90 days. The CHO remains responsible for meeting data quality and other obligations during this 90 day period.

c. Severe Violations

Severe violations include but are not limited to:

- Two or more major violations within a 24 month time period
- Sharing ServicePoint End User accounts
- End users leaving ServicePoint account credentials in plain view or unattended
- Improper access of client data beyond the scope outlined in Section 7

The sanction for a severe violation is:

- A letter as described in “First violation” for minor violations above
- A mandatory training as described in “Second violation” for minor violations above
- The End User violating the policy or procedure will be prohibited from accessing ServicePoint or participating in HMIS data collection for one year
- Toledo HMIS will levy a fine of one percent (1%) of the CHO’s annual budget for activities reported on the Housing Inventory Chart, to a maximum of five hundred dollars (\$500). If a CHO has no activity on the Housing Inventory Chart, the fine will be calculated from their overall agency budget.

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d. Findings

The TLCHB Technology Director will document any suspected finding of violation(s) and provide them to the TLCHB Executive Director. The Executive Director will issue notices to the CHO in question describing the finding of violation(s) and the associated sanction(s).

e. Appeals

Findings of violations may be appealed, in writing, by the CHO in question. All appeals must be submitted in writing and should include any available supporting documentation. Appeals must be submitted within five (5) business days of the date the CHO received notice of the finding.

- i. Appeals for Minor Violations will be received and reviewed by the Executive Director. The Executive Director will issue a response within five (5) business days of receiving the appeal, including any amendments to the sanction(s).
- ii. Appeals for Major or Severe Violations will be received and reviewed by the Quality & Performance Committee, which will issue a response within thirty (30) calendar days of receiving the appeal, including any amendments to the sanction(s).

III. Data Quality Plan

1. Data Definitions

With the exception of a few custom fields used for Coordinated Assessment activity, Data Elements used by Toledo HMIS match those prescribed by the U.S. Department of Housing and Urban Development in their March 2010 HMIS Data Standards Revised Notice.

2. Categories of Data Elements

a. Client Identifiers

- Name
- Date of Birth
- Social Security Number
- Gender

b. Universal Data Elements

- All Client Identifiers
- Race
- Ethnicity
- Veteran Status
- Disabling Condition
- Residence Prior to Program Entry
- Last Permanent ZIP Code
- Housing Status
- Household Membership
- Program Entry Date
- Program Exit Date (if applicable)

c. Program-Specific Data Elements

- Extent of Homelessness

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- Chronic Homelessness Status
- Income Amounts & Sources
- Non-Cash Benefit Amounts & Sources
- Physical Disability
- Developmental Disability
- Chronic Health Condition
- HIV/AIDS Diagnosis
- Mental Health Condition
- Substance Abuse
- Domestic Violence
- Reason for Leaving (if applicable)
- Destination (if applicable)

d. Local Data Elements

- Employment
- Education
- General Health
- Pregnancy
- Veteran Details
- Children's Education
- Primary Reason for Homelessness/Threat to Housing Stability

e. Assessment Data

- McKinney-Vento (HEARTH Act) Homelessness Category
- Reason(s) Why Housing with Friends is Unsuitable
- Reason(s) Why Housing with Family is Unsuitable
- Household Area Median Income Bracket
- Monthly Gross Rent Expenses
- Leasing Status
- Eviction Type
- Risk Factor(s) for Street Homelessness/Shelter
- National Alliance to End Homelessness Triage Profile
- Program Eligibility
- Program Referral

f. Service and Shelter Records

- Alliance of Information and Referral Systems (AIRS) Taxonomy Code
- Start and End Dates
- Bed Assignment (if applicable)
- Amount or Units of Assistance (if applicable)
- HPRP Assistance Category (if applicable)
- Funding Source (if applicable)
- Current or Arrears Designation (if applicable)

g. Extended Data

- Includes Case Notes

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- Goals
- Action Steps
- Follow-Up Plans
- Needs
- Referrals
- Self-Sufficiency Matrix measurements
- Case Manager(s)

3. Required Data

CHO's will collect a required set of data elements for each client. The set of required data elements varies by program type and individual data elements may not be required for all populations, as established in Section 1.

a. Emergency Shelters and Safe Havens

Includes any programs designated as an Emergency Shelter or Safe Haven on the Continuum of Care's Housing Inventory Chart. The following data are required.

- Universal Data Elements: All
- Program-Specific Data Elements: All
- Local Data Elements: All
- Assessment Data: None
- Service and Shelter Records: All
- Extended Data: None

b. Transitional Housing and Permanent Supportive Housing

Includes any programs designated as Transitional Housing or Permanent Supportive Housing on the Housing Inventory Chart. The following data are required.

- Universal Data Elements: All
- Program-Specific Data Elements: All
- Local Data Elements: All
- Assessment Data: None
- Service and Shelter Records: All
- Extended Data: None

c. Continuum of Care Program, Emergency Solutions Grant, and Ohio Office of Community Development Homeless Prevention and Rapid Re-Housing Programs

Includes Homeless Prevention and Rapid Re-Housing Programs receiving Continuum of Care Program, Emergency Solutions Grant, and Ohio Office of Community Development funds for their activities. The following data are required.

- Universal Data Elements: All
- Program-Specific Data Elements: All
- Local Data Elements: All
- Assessment Data: None
- Service and Shelter Records: All
- Extended Data: None

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d. Other Direct Financial Assistance Programs

Includes rent, deposit, and/or utility assistance programs not funded through programs described in (3)(c), above. The following data are required.

- Universal Data Elements: All
- Program-Specific Data Elements: Reason for Leaving and Destination at Exit only
- Local Data Elements: Primary Reason for Homelessness/Threat to Housing Stability only
- Assessment Data: None
- Service and Shelter Records: All
- Extended Data: None

e. Other Non-Residential Services Only

Includes any participating programs which are not listed on the Housing Inventory Chart and which do not provide direct financial assistance or subsidies in support of client housing costs.

- Universal Data Elements: All
- Program-Specific Data Elements: None
- Local Data Elements: Primary Reason for Homelessness/Threat to Housing Stability only
- Assessment Data: None
- Service and Shelter Records: All
- Extended Data: None

f. Coordinated Assessment

Includes TLCHB's Project Home coordinated assessment program. The following data are required.

- Client Identifiers: Name, Date of Birth, Gender, last four digits of Social Security Number
- Universal Data Elements: Client Identifiers and Household Membership only
- Program-Specific Data Elements: Reason for Leaving and Destination at Exit only
- Local Data Elements: Primary Reason for Homelessness/Threat to Housing Stability only
- Assessment Data: All
- Service and Shelter Records: None
- Extended Data: None

4. Data Completeness

a. Program Entry Date and Program Exit Date

CHOs are responsible for completing 100% of their Program Entry Dates and Program Exit Dates for all clients served.

b. All Other Data

CHOs are responsible for completing ninety-five percent (95%) or more of all other client-level data at both entry and exit.

5. Data Validity/Congruence

CHO's are responsible for providing data that is valid and congruent, meaning that the data should not contain contradictions or impossibilities. No more than one half of one percent (0.5%) of clients should exhibit any given incongruence case, which includes but is not limited to:

- a. Date of birth indicating negative age;

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- b. Date of birth indicating age greater than one hundred years old;
- c. Date of birth same as date client was created in HMIS;
- d. Age inconsistent with household relationship (nine-year-old grandmother, etc.);
- e. Veteran status is yes but age is less than eighteen;
- f. Gender conflicts with household relationship (male grandmother);
- g. Listed as head of household but relationship to head of household is not “self”;
- h. Not listed as head of household but relationship to head of household is “self”;
- i. Household membership but no household relationship; and
- j. Client listed as pregnant but not a female between twelve and fifty-five years old.

6. Monitoring and Evaluation

Toledo HMIS will periodically monitor and evaluate the Completeness and Validity of data. Data Completeness will be evaluated after each month, and Data Validity will be evaluated after each quarter.

a. Reporting Schedule

- All data for a reporting period should be completed by the fifth day of the following month;
- Toledo HMIS will provide draft reports of Data Completeness and Validity (quarterly only) on the sixth day of the following month;
- Toledo HMIS will provide support to CHOs as-needed for corrections of the previous reporting period’s data and CHOs are expected to make any corrections by the tenth day of the following month; and
- Toledo HMIS will provide a second, final report to each CHO on the eleventh day with updated figures

b. Performance Evaluation

CHO performance on Completeness and Validity of data will be scored using a points system. CHOs who meet the required standard for Completeness will be awarded 1.50 points per month. CHOs who meet the required standard for Validity will be awarded 1.75 points per quarter. The maximum number of points for Data Quality per calendar year is 25.00.

c. Sanctions for Poor Performance

CHOs which consistently contribute low quality data may be required to receive additional training from Toledo HMIS, develop a written Data Quality Improvement Plan, and/or have End User Accounts suspended until appropriate action is taken to improve Data Quality.