**Scranton/Lackawanna County Continuum of Care**

**Homeless Management Information Systems**

**Policies and Standard Operating Procedures**

**Version 1.0**

Effective Date

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**Scranton/Lackawanna County Homeless Management Information Systems**

**Policies and Standard Operating Procedures**

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**Scranton/Lackawanna Continuum of Care**

**Homeless Management Information Systems**

**Policies and Standard Operating Procedures**

This document details the policies and standard operating procedures that govern the operation of the Scranton/Lackawanna County Continuum of Care Homeless Management Information System (SLCCoC HMIS). It defines the roles and responsibilities of the HMIS Lead, agencies and individuals accessing SLCCoC HMIS data. It includes important information on the way the SLCCoC HMIS data is secured and protected. All individuals accessing SLCCoC HMIS must read and understand these Standard Operating Procedures.

**INTRODUCTION**

This document details the policies and standard operating procedures that govern the operation of the Scranton/Lackawanna County Continuum of Care Homeless Management Information System (SLCCoC HMIS). It defines the roles and responsibilities of the HMIS Lead, agencies and individuals accessing SLCCoC HMIS data. It includes important information on the way the SLCCoC HMIS data is secured and protected. All individuals accessing the SLCCoC HMIS must read and understand these Standard Operating Procedures.

SLCCoC HMIS is administered by the United Neighborhood Centers of Northeastern Pennsylvania (UNC), a non-profit corporation acting in the behalf of the SLCCoC Board. The SLCCoC Board is comprised of six regional providers that are under contract with the U.S Department of Housing and Urban Development (HUD) to provide homeless services as well as other community stakeholders. The central server is administered by the contracted HMIS software vendor, and UNC administers licensing, training, and compliance.

The primary purpose of the SLCCoC HMIS is to provide a client and service data management tool to aid the Continuum of Care to end homelessness in Scranton/Lackawanna County and meet HUD requirements for CoCs to provide an unduplicated demographic report of the number and characteristics of clients served as well as program outcomes. This tool is Internet-based technology to assist homeless service organizations across Lackawanna County in capturing information about the clients that they serve.

SLCCoC HMIS provides a standardized assessment of consumer needs creates individualized service plans and records the use of housing and services which communities can use to determine the utilization of services of participating agencies, identify gaps in the local service continuum, and develop outcome measurements.

**Benefits of SLCCoC HMIS**

1. **SLCCoC HMIS benefits homeless men, women, and children:**

Improvements in service delivery for clients as case managers assess the client’s needs, inform the client about available services on site or through referral, help the client find and keep permanent housing, and improve service coordination when information is shared between programs within one agency that are serving the same client.

1. **SLCCoC HMIS benefits agencies, program managers and case managers:**
	1. Aggregate program-level and agency-level information and reports should be accessible to agencies and program managers to provide a more complete understanding of clients’ needs and outcomes, advocate for additional resources, complete grant applications, conduct evaluations of program services and staff performance, and report to funders. Minimally, the software should be able to generate the program portions of the HUD CoC Annual Progress Report (APR) and HUD ESG Consolidated Annual Performance and Evaluation Report (CAPER).
2. **SLCCoC HMIS benefits the regional Continuum of Care:**

Unduplicated, de-identified, system-wide information should be readily accessible to provide a more complete understanding of homelessness, clients’ needs and outcomes, and program and system-level performance to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels. The software should also be able to generate data and/or reports to fulfill Federal Annual Homeless Assessment Report (AHAR), System Performance Measures, Continuum application requirements, and city-wide and system-level funding reports.

**Definitions**

**Many of the terms used in this Policies and Standard Operating Procedures**

**Manual may be new to many users. Definitions of some of these terms are as follows:**

**Agency Administrator:** The person responsible for system administration at the agency level. This person is responsible for adding and deleting users, basic troubleshooting, and organizational contact with the SLCCOC HMIS System Administrator.

**Authentication:** The process of identifying a user in order to grant access to a system or resource; usually based on a username and password.

**Authorized Agency:** Any agency, organization or group who has an SLCCOC HMIS Agency Agreement with the SLCCOC HMIS System Administrator and that is allowed access to the SLCCOC HMIS database.

**Eccovia Solutions:** The company that wrote the software used for the SLCCoC HMIS. Eccovia Solutions, also houses and maintains the server which houses our HMIS database.

**Client:** Any recipient of services offered by a Provider or Authorized Agency.

**Client-level Data:** Data collected or maintained about a specific person. This type of data can be de-identified for purposes of data analysis, which means that personally identifying information is removed from the record.

**Database:** An electronic system for organizing data so it can easily be searched and retrieved; usually organized by fields and records.

**De-identified Data:** Data that has been stripped of personally identifying information.

**Encryption**: Translation of data from plain text to a coded format. Only those with the “key” have the ability to correctly read the data. Encryption is used to protect data as it moves over the internet and at the database level through the use of special software.

**Fiscal Agency:** The agency chosen by the SLCCoC governing board to manage the financial aspects of the corporation, including the general ledger, accounts payable, and accounts receivable. The Agency shall follow fiscal policies established by general accounting principles.

**Firewall:** A method of controlling access to a private network, to provide security of data. Firewalls can use software, hardware, or a combination of both to control access.

**HMIS:** Homeless Management Information System. This is a generic term for any system used to manage data about homelessness and housing.

**HUD HMIS Data and Technical Standards (the Standards)**: The most recent HUD Standards published for Continua of Care to systematically collect and report data for projects funded under Title IV of the McKinney-Vento Homeless Assistance Act. The current Standards were published in the July 30, 2004 Federal Register, Vol. 69, No. 146, pp. 45888 through 45934, with revisions released by HUD in March 2010. These standards fall into three categories: a) data elements required to be collected by HMIS users including “universal” and “program specific” data elements; b) Privacy and Security Standards for data confidentiality; and c) Technical Standards for the creation of HMIS data systems. Whenever the Standards are revised, this definition will reflect the most recently adopted revisions, and a change to the SLCCOC HMIS policies is not required.

**Identifying Information:** Information that is unique to an individual and that may be used to identify a specific person. Examples of identifying information are name and social security number.

**SLCCoC HMIS:** The software system as well as the information input, generated or acquired in print or machine readable format.

**Provider:** ANY organization providing outreach, shelter, housing, employment and/or social services.

**SLCCoC HMIS Lead Agency:** Manages the SLCCoC HMIS for the Continuum of Care

**Server:** A computer on a network that manages resources for use by other computers in the network. For example, a file server stores files that other computers (with appropriate permissions) can access. One file server can “serve” many files to many client computers. A database server stores a data file and performs database queries for client computers.

***ClientTrack*:** A web-based software package developed by Eccovia Solutions which tracks data about people in housing crisis in order to determine individual needs and provide aggregate data for reporting and planning.

**HMIS Lead:** The job title of the person who is responsible for the coordination and administration of SLCCoC HMIS. This person has the highest level of user access in *ClientTrack* and has full access to all user and administrative functions across the County. This person provides technical support and training to Users.

**User:** An individual who uses a particular software package; in the case of the SLCCOC HMIS, the *ClientTrack* software.

**User License:** An agreement with a software company that allows an individual to use the product. In the case of *ClientTrack,* user licenses are agreements between the Fiscal Agency and Eccovia Solutions that govern the distribution of regional licenses for individual connections to SLCCoC HMIS. User licenses cannot be shared.

**Policy 1.0 Organization and Management of the SLCCoC HMIS System**

Responsible: SLCCoC Board Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the SLCCoC Board regarding access and usage of SLCCoC HMIS as well as the responsibilities for stewardship of SLCCoC HMIS.

**Policy Statement**

The SLCCoC Board is comprised of HMIS participating agencies and other homeless stakeholders in the Scranton/Lackawanna County Continuum of Care that are under contract with the U.S Department of Housing and Urban Development (HUD) and shall establish guidelines and operating policies for the SLCCoC HMIS to comply with federal regulation and guidance provided through the Department of Housing and Urban Development. These Policies and Standard Operating Procedures will be made available to all participating agencies, and a system of review will be established to ensure ongoing viability and responsiveness of policies to the project’s environment.

**Policy 1.1 SLCCoC Board**

Responsible: SLCCoC Board Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the SLCCoC Board regarding access and usage of SLCCoC HMIS as well as the responsibilities for stewardship of SLCCoC HMIS.

**Policy Statement**

The SLCCoC Board is the governing body in control of the county-wide HMIS system and has sole responsibility for the following programmatic areas: ensuring active membership in the HMIS Committee; monitoring the Lead Agency and Participating Agencies for compliance; and quality assurance/accountability. The Board meets at least quarterly. The Board is the final decision making authority of SLCCoC HMIS.

Membership of the SLCCoC Board will be established according to the guidelines outlined in the SLCCoC By-Laws. Roles and responsibilities of the Board include, but are not limited to:

* Determining the guiding principles that should underlie the implementation activities of SLCCoC HMIS, participating organizations and service programs;
* Adopting the Data Quality Plan for ensuring participation compliance;
* Defining criteria, standards, and parameters for the release of aggregate data;
* Ensuring adequate privacy protection provisions in project implementation; and
* Selecting and contracting with an HMIS software vendor

**Policy 1.2 Fiscal Management**

Responsible: United Neighborhood Centers Effective Date: January 19, 2017

Authorized: United Neighborhood Centers Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the United Neighborhood Centers regarding financial management of the corporation.

**Policy Statement**

United Neighborhood Centers has fiduciary responsibility for the HMIS grant. All financial activities will be documented through General Accounting Principles and comply with financial regulatory requirements as applicable. In relation to fiscal management, United Neighborhood Centers is the final decision making authority of the HMIS grant.

United Neighborhood Centers shall adopt a budget; continuously review the operation of that budget and recommend appropriate changes therein during the fiscal year; and supervise the financial operations of the grant.

United Neighborhood Centers has the authority to contract with a fiscal agency to perform the day to day financial activities of the corporation. The Fiscal Agency will be required to follow the equivalent financial guidelines as the corporation and must be audited annually by an independent public accountant.

**Policy 1.3 HMIS Lead**

Responsible: United Neighborhood Centers Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the HMIS Lead Agency regarding access and usage of the HMIS System as well as the responsibilities for stewardship of the HMIS System.

**Policy Statement**

The CoC Board designates the HMIS Lead Agency as United Neighborhood Centers. United Neighborhood Centers will provide for SLCCoC HMIS services. United Neighborhood Centers will designate a staff member as the HMIS Lead. The HMIS Lead will be responsible for the management and supervision of the SLCCoC HMIS. In the absence of the HMIS Lead, UNC will designate a back-up staff person, until a new HMIS Lead is determined. The HMIS Lead has access to all agency records within the Continuum. The HMIS Lead is governed by these Policies and Standard Operating Procedures.

The HMIS Lead is responsible for the following:

* Manage the day-to-day operations of the SLCCoC System.
* Respond to all system-wide questions and issues;
* Provide quality assurance reports to the HMIS Committee;
* Issue User Licenses;
* Provide support to HMIS users upon request;
* Manage version controls;
* Monitor data quality and report data quality issues to Participating Agencies to ensure timely correction and support;
* Convene Community User Meetings and group trainings upon request.
* Train and support Participating Agencies in the use of SLCCoC HMIS.
* Attend System Administration User Meetings to share and benefit from the lessons learned across the Commonwealth and region.
* Report database problems to Software Provider.
* Manage notification of upgrades and updates to CHOs.
* Mine the database to respond to authorized requests for information.
* Prepare formal reports for the local Continuum of Care
* Sign Participating Agency Agreements as requested
* Sign and understand EndUser Agreement
* Complete required trainings with regard to Privacy and System Use.
* Manage password recovery.
* Respond to questions from the assigned Agency Administrators and provide on-site help as needed.
* Guide the HMIS process locally.

 **Policy 1.4 Participating Agency**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCOC HMIS Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the Participating Agency regarding access and usage of HMIS as well as the responsibilities for stewardship of HMIS.

**Policy Statement**

The Continuum of Care shall identify and solicit the participation of human service providers who are necessary contributors to the HMIS system. These are to include: emergency shelters, transitional housing programs, rapid rehousing programs, homeless outreach programs, permanent supportive housing providers, and homeless prevention programs.

In addition, each region may discretionally identify other service providers that could benefit from inclusion in SLCCoC HMIS. Each Participating Agency will be accountable for adherence to the minimum data collection and technical standards set by the HMIS Committee and HMIS Lead, where applicable, as detailed in the Standard Operating Procedures.

Before an agency can join SLCCoC HMIS, a Partnership Agreement must be signed and all policies and accompanying documentation must be adopted. The Participating Agency will be responsible for oversight of its own related confidentiality requirements and bears primary responsibility for oversight for all sharing of data it has collected via HMIS.

**Policy 1.5 Agency Administrator**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the Agency Administrator regarding access and usage of HMIS as well as the responsibilities for stewardship of HMIS.

**Policy Statement**

Each Participating Agency must identify a staff member to be the HMIS Agency Administrator. The HMIS Agency Administrator is the single point of contact for communication purposes and is responsible for enforcing the data and security requirements under the Policy and Procedures. The Executive Director must submit in writing the name and contact information of the HMIS Agency Administrator to the HMIS Lead. The Executive Director must notify the HMIS Lead of changes in personnel in writing within one business day. If the HMIS Agency Administrator does not have the capacity to fulfill the technical obligations of this role, arrangement can be made with the HMIS Lead prior to executing an Agency Agreement to ensure the Participating Agency is compliant with the data and security requirements of the HMIS.

The Agency Administrator is responsible for the following:

* Primary contact between the Participating Agency and the HMIS Lead
* Must have email, internet access, and an HMIS User License
* Manages agency user licenses; requesting addition and removal of licensed users for their agency, at the discretion of the HMIS Lead
* HMIS access must be revoked immediately upon termination from agency, placement on disciplinary probation, or upon any change in duties not necessitating access to HMIS System information. All changes must be relayed in writing to the HMIS Lead.
* Ensures the stability of the agency connection to the Internet and *ClientTrack*, either directly or in communication with other technical professionals
* Provides support for the generation of agency reports
* Monitors and enforces compliance with standards of client confidentiality and ethical data collection, entry, and retrieval at the agency level

**Policy 1.6 HMIS User**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the HMIS User regarding access and usage of the system as well as the responsibilities for stewardship of HMIS.

**Policy Statement**

All HMIS Users will have access to data that is appropriate to the duties of their position so that client and service information can be recorded and accessed on a “need to know” basis. Each User will complete a training course and sign the User Agreement prior to gaining access to HMIS through the issuance of a license.

The User is responsible for the following:

* Adhering to all SLCCoC HMIS policies as detailed in the User Agreement
* Securing his/her log-in information so that it will not be shared with another, including administrators or other staff
* Disclosing HMIS participation and data usage to all clients prior to collection and entry
* Entering and updating client data in a “timely” manner

**Policy 1.7 System Availability**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for providing availability of database server and notification in advance of any disruption of server availability.

**Policy Statement**

All SLCCoC HMIS Users will retain undisrupted access to SLCCoC HMIS, with the exception of scheduled system maintenance. Notification of database unavailability will be posted to the “Organization News” section of ClientTrack on the User Dashboard and sent to all users via e-mail no less than forty-eight hours prior to the disruption.

**Policy 1.8 Ethical Data Usage**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the baseline ethics for HMIS data usage by anyone accessing the System.

**Policy Statement**

Data contained in HMIS is intended to be used to support or report on the delivery of homeless and housing services in the Scranton/Lackawanna County. Each User will affirm the principles of ethical data use and client confidentiality contained in the Policies and Standard Operating Procedures Manual and the User Agreement. Each Authorized Agency must have a written privacy policy that includes policies related to employee misconduct or violation of client confidentiality. All Users must understand their Agency’s privacy policy, and an HMIS User Agreement must be held at the agency level for each User.

The data collected in HMIS is primarily the personal information of people in Scranton/Lackawanna County who are experiencing a housing crisis. It is the user’s responsibility as the guardian of that data to ensure that it is only used to the ends to which it was collected and in and the manner to which the individual client has given consent.

All users will sign an HMIS User Agreement before being given access to HMIS. Any individual or Authorized Agency misusing, or attempting to misuse HMIS data will be denied access to the database, and his/her/its relationship to HMIS may be terminated.

**Policy 1.9 Inter-Agency Data Sharing**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for any client data sharing from the Participating Agency inputting and releasing data to any other Participating Agency accessing HMIS.

**Policy Statement**

Electronic data sharing varies between agencies. The need for client confidentiality and the benefit of integrated case management should be balanced when discussing inter-agency data sharing. During the development of the regional HMIS, Scranton/Lackawanna County CoC favored electronic data sharing within HMIS for the benefit of interagency case management. Since then, additional agencies, not receiving CoC/ESG funds, have been added to the system. The inter-agency data sharing policy is as follows:

CoC/ESG-fund recipients share all information that is entered into the system with exception to domestic violence service agency and clients that explicitly refuse to share data in SLCCoC HMIS.

Additional participating agencies will be set up as deemed appropriate by the CoC Board with consideration to client privacy as well as service facilitation.

**Policy 1.10 Support**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements of technical support for the HMIS software application.

**Policy Statement**

The HMIS Lead shall provide ongoing support to the Participating Agency through training on the system and ongoing telephone Help Desk functions. The HMIS Lead acknowledge the receipt of inquiries in a timely manner. The HMIS Lead will provide electronic access to documentation and manuals regarding the use of HMIS. The HMIS System also contains an on-line Help function for user support.

Support will include the HMIS Lead verification that the network server and the HMIS System are functioning correctly. Participating agencies are responsible for maintenance of their computer hardware and internet connectivity. The HMIS Lead will assist agency staff with questions that arise during the use of the System. Participating agencies should contact the Lead with questions or problems that appear to be related to errors in the System. The HMIS Lead may pass a description of the problem and an agency contact name to Eccovia Solutions Technical Support. The HMIS Lead will assist in the consolidation and deletion of duplicate client records.

**Policy 2.0 Requirements for Agency Participation**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the Participating Agency and User to obtain authorization to access and use HMIS.

**Policy Statement**

The HMIS Lead will ensure that anyone accessing HMIS has met the following standards:

* The agency requesting to participate in SLCCoC HMIS has signed a Partnership Agreement and the agreement will be on file at the HMIS Lead agency. The agency accessing the system shall ensure that measures have been taken to secure the physical location used for data entry. A computer that has HMIS “open and running” shall never be arranged so that unauthorized individuals may see the information on the screen.
* The User requesting access to the system has been given written permission from the Agency Administrator to access the system.
* The User given access to the system will have read, understood, and provided a signed acknowledgment of receipt of Policies and Standard Operating Procedures Manual.
* The User will be assigned a user name and password once they have successfully participated in HMIS Training.

**Policy 2.1 Participating Agency Agreement**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the Participating Agency Agreement.

**Policy Statement**

Only authorized Participating Agencies will be granted licenses to gain access to HMIS. The HMIS Lead will make the sole determination to identify Participating Agencies. Participating Agencies ensure that all aspects of the Participating Agency Agreement are followed as specified.

* The agency requesting to participate in HMIS has signed a Participating Agency Agreement and the agreement will be on file at the HMIS Lead agency.
* The Participating Agency Agreement outlines responsibilities and duties of the HMIS Lead and the Participating Agency including requirements for all aspects of system access and use.
* The Participating Agency Agreements will include terms and duration of access, an acknowledgement of receipt of the Policies and Standard Operating Procedures Manual, and an agreement to abide by all provisions contained therein.

**Policy 2.2 User Licenses**

Responsible: HMIS Lead Effective Date:

Authorized: SLCCoC Board Last Revision:

**Scope**

This policy establishes requirements for the Participating Agency and end user to obtain and utilize user licenses to gain access and use the SLCCoC HMIS.

**Policy Statement**

1. Fifteen licenses are available for each Participating CoC Agency. If necessary, the Participating Agency may incur any additional costs for licenses through the HMIS Lead Agency based upon the current quote from the system provider.
2. User licenses for agencies that do not receive CoC funds will be negotiated between the HMIS Lead Agency and relevant participating agency based upon the current quote from the system provider.
3. In order to obtain a license, a User must successfully complete an approved training program by the HMIS Lead.
4. Sharing of licenses, User IDs or passwords is strictly prohibited.

**Policy 2.3 User Cost**

Responsible: Participating Agency Effective Date:

Authorized: SLCCoC Board Last Revision:

**Scope**

This policy establishes cost requirements by Participating Agencies to gain access and use HMIS.

**Policy Statement**

1. Should it become necessary to incur shared costs by participating agencies, the HMIS Lead shall determine the per agency cost, in consultation with and after advance approval of the Scranton/Lackawanna County Continuum of Care and participating agencies.
2. Costs shall be documented and itemized with an invoice sent to the Participating Agency directly from the HMIS Lead Agency.
3. Payments shall be made payable to the United Neighborhood Centers and due –*insert payment schedule*-.
4. Costs shall be designated as follows: \_\_\_\_\_\_\_\_\_\_\_\_\_ per month totaling \_\_\_\_\_\_\_\_\_\_\_\_ per year.

**Policy 2.4 User Activation**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the User activation to access and use HMIS.

**Policy Statement**

1. The User requesting access to the system has been given written permission from the Agency Administrator to access the system through written request to the HMIS Lead.
2. The User given access to the system will have read, understood, and provided a signed acknowledgment of receipt of Policies and Standard Operating Procedures Manual.
3. The User will be assigned a user name and password once they have successfully participated in HMIS Training.
4. The HMIS Lead, will distribute User licenses, adding and deleting Users as necessary.
5. The HMIS lead will be responsible for training all new Users.

**Policy 2.5 User Agreement**

Responsible: Participating Agency and User Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the User to obtain authorization to access and use HMIS.

**Policy Statement**

Users must sign a User Agreement with the HMIS Lead Agency acknowledging full understanding and acceptance of the responsibilities and the proper use of the User ID and password of SLCCoC HMIS. Only individuals who can view information in SLCCoC HMIS are authorized users along with the Client to whom the information pertains.

Failure to uphold the standards set forth in the User Agreement items listed below are grounds for immediate termination of User privileges.

1. User ID and Passwords must be physically secure and cannot be shared with anyone, including other staff members, supervisors or Executive Director.
2. Access to HMIS is limited to User designated work and their location must meet all HUD HMIS Data and Technical Standards.
3. Users of HMIS, whatever their work role, position, or location, may view, obtain, disclose, or use client data from SLCCoC HMIS only as is necessary to perform their specific job.
4. Failure to log off HMIS appropriately may result in a breach in client confidentiality and system security. Users must log-off of HMIS before leaving the work area for any reason.
5. A computer that has the SLCCOC HMIS System “open and running” shall never be arranged so that unauthorized individuals may see the information on the screen.
6. Users must not change the closed security on any Client’s signed HMIS Client Release of Information. The HMIS security settings must always reflect the Client’s expressed wishes as documented through the HMIS Client Release of Information.
7. User access is revoked immediately upon employment termination
8. Users are responsible to immediately notify the HMIS Lead at 570-346-0759 in the event that any breach of confidentiality is witnessed.

**Policy 2.6 Hardware and Software Requirements and Maintenance**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes hardware and software requirements for the Participating Agency to access and use SLCCoC HMIS.

**Policy Statement**

The Participating Agency shall maintain and secure the minimum required hardware, software and internet connectivity required in the Data Standards released by the Department of Housing and Urban Development. These minimum requirements include the following:

* Microsoft Operating System: Windows XP Professional
* Virus Protection Software: must automatically update and upgrade
* Anti-spy ware Software: must automatically update and upgrade
* Firewall: Can be software or hardware
* Internet Connectivity: must be DSL or higher
* PC: Pentium IV or higher
* PC Access: PC must be password protected with each user having a unique Login ID and Password

Bandwidth Recommendations:

The average user will need to sustain a 30-50 Kilobytes/Sec of download throughput to comfortably browse SLCCoC HMIS. Internet Bandwidth Comparisons

* 56K Modem– Most users will achieve a connection between 26.4K – 46K depending upon the phone line quality. This will provide at least a 5.0 KB/S transfer rate which is low and not recommended for a single user.
* SDSL – 512Kbps/62.5KB/s. Allows eight users to concurrently browse SLCCoC HMIS or use the Internet.
* ADSL– 1.5-8Mbps/187.5KB/s-1MB/s. Allows 23 – 125 users concurrently to use SLCCoC HMIS System or use the Internet. Distance limited to 18,000 feet.
* Cable – 1Mbps/122.1KB/s. Allows 15 users to concurrently use SLCCoC HMIS or the Internet.
* T1 – 1.544Mbps/188.5KB/s. Allows 23 users to concurrently use SLCCoC HMIS or the Internet.
* T3– 44.763Mbs/5.461MB/s. Allows 682 users to concurrently use SLCCoC HMIS or the Internet.

Other System Requirements:

* Use with a modern browser such as Microsoft Internet Explorer 7+, Google Chrome, and Firefox 9.0+.
* Set video display to 1024 x 768 or higher.

**Policy 2.7 Training**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to train all authorized personnel gaining access and use of SLCCoC HMIS.

**Policy Statement**

1. The HMIS Lead shall provide training to authorized Participating Agency personnel on use of SLCCoC HMIS.
2. The HMIS Lead shall utilize standardized training materials and curriculum in order to ensure that training is consistent.
3. Upon completion of training, the Participating Agency personnel should reasonably understand how the system works.
4. Tests and certifications may be required by the HMIS Lead.

**Policy 2.8 Contract Termination**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the HMIS Lead Agency to terminate a Participating Agency Agreement.

**Policy Statement**

The HMIS Lead Agency may terminate the Participating Agency Agreement for non-compliance with the terms of the agreement or with the SLCCoC HMIS Policies and Standard Operating Procedures with written notice to the Participating Agency. The HMIS Lead Agency may also terminate the Participating Agency Agreement with or without cause with 15 days written notice to the Participating Agency and according to the terms specified in the Participating Agency Agreement. The termination of the Participating Agency Agreement may affect other contractual relationships with the local Continuum of Care or with funding agencies (HUD).

While the HMIS Lead Agency may terminate the Participating Agency Agreement with the Participating Agency, all data entered into the SLCCoC HMIS will remain a part of the SLCCoC HMIS. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in Scranton/Lackawanna County. The termination of the Participating Agency Agreement may affect other contractual relationships with Continuum of Care or with funding agencies (HUD).

Many Participating Agencies are required to participate in HMIS as a condition of specific funding. When terminating the Agency Agreement, the Board Chair of the Continuum of Care will notify the person from the Participating Agency who signed the Agency Agreement (or a person in the same position within the agency) 15 days or more prior the date of termination of contract, unless the termination is due to non-compliance with the SLCCoC HMIS Policies and Standard Operating Procedures. Willful neglect or disregard of the SLCCoC HMIS Policies and Standard Operating Procedures may result in immediate termination of a Participating Agency from SLCCoC HMIS. In all cases of termination of Participating Agency Agreements, the HMIS Lead will inactivate all users from that Participating Agency on the date of termination of contract.

**Policy 3.0 Security and Access**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for implementing and maintaining security and access to the SLCCoC HMIS.

**Policy Statement**

The HMIS Lead and Participating Agencies will apply the user access privilege conventions set forth in the SLCCoC HMIS Policies and Standard Operating Procedures, Policy 2.5 Users Agreement and 3.8 User ID and Password.

**Policy 3.1 Security of Data on File Server**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to secure access to data on SLCCoC HMIS.

**Policy Statement**

The SLCCoC HMIS Lead Agency along with the HMIS Committee shall establish and maintain controls to keep secure all client data in SLCCoC HMIS. This shall prohibit access by individuals who are not registered with the HMIS Lead Agency, and therefore, are unauthorized to receive Participating Agency and client data information through any and all means, including telephone, mail, and computer. All registration and addition of Participating Agency staff to SLCCoC HMIS will be handled solely through the HMIS Lead. The HMIS Lead is responsible for assigning initial passwords and providing accessibility to SLCCoC HMIS to only those authorized individuals designated by the Executive Director or his/her designee of the Participating Agency. The HMIS Lead shall not be held liable for any breach in security related to any changes in authorized Participating Agency personnel if the Participating Agency has not notified the HMIS Lead; notification must be documented through e-mail, or postmarked through postal mail, within one business day of the personnel changes.

**Policy 3.2 Back Up of Data on File Server**.

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to back up data to ensure continuity of access to data.

**Policy Statement**

The HMIS Lead Agency shall contract with the software vendor to provide for the back-up of all information housed within SLCCoC HMIS. Eccovia Solutions’ ClientTrack include the following features:

* Incremental database backups are performed every 4 hours
* Each night a full backup is taken
* Each week all nightly backups are consolidated
* Backups are encrypted with 256-bit AES encryption
* Backups are sent offsite to a secure store facility daily.

**Policy 3.3 Updates/Upgrades to SLCCoC HMIS**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to update/upgrade the SLCCoC HMIS System.

**Policy Statement**

The HMIS Lead shall notify the Participating Agency of all updates and/or upgrades to SLCCoC HMIS through email to the Agency Administrator and posting notice in the “Organization News” of the SLCCoC HMIS User dashboard. All updates and/or upgrades to will occur no sooner than one business day after the notice.

**Policy 3.4 Data on File Server**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements of data access upon termination of the Participating Agency entering data into SLCCoC HMIS.

**Policy Statement**

Upon termination of the Agency Partner Agreement, and at the Participating Agency’s request, the HMIS Lead may assist the Participating Agency with generating a final global report of their data within a reasonable time frame. Notwithstanding anything in the agreement to the contrary, the HMIS Lead Agency and agencies using the SLCCoC HMIS shall have the continuing right after the termination of this agreement to retain and use a copy of the Participating Agency’s data which was shared during the course of this agreement in furtherance of the SLCCoC HMIS programs and subject to any restrictions on use imposed by the clients to whom such data pertains and/or set forth in the provision hereof which, by their terms, survive termination of the agreement.

**Policy 3.5 Data Collection**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the SLCCoC HMIS adherence to data collection and data integrity requirements.

**Policy Statement**

The Participating Agency shall enforce with their staff the importance, quality, and accuracy of entering all data into the SLCCoC HMIS, as required in the Department of Housing and Urban Development Data Standards. After training of agency staff by the HMIS Lead, the Participating Agency has the responsibility to implement and manage a system for entering client data; the HMIS Lead will provide assistance with project management if requested by the Participating Agency. The Participating Agency must ensure that all selected personnel are trained on these procedures and adhere to the regulations as stated in the Data Quality Plan, Appendix B.

**Policy 3.6 User Access**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to appropriately add users of SLCCoC HMIS as well as designate system use restrictions.

**Policy Statement**

The HMIS Lead will generate usernames and initial passwords within the administrative function of SLCCoC HMIS.  User ID and Passwords are to be assigned to individuals who have received the SLCCoC HMIS System training and who have understood and signed all appropriate user agreements and related documents.

Access to the software system will only be allowed from computers and networks meeting HUD Technical Standards and specifically identified by the Executive Director and Agency Administrator of the Participating Agency. Access to SLCCoC HMIS from unauthorized locations will be grounds for termination of user rights.

**Policy 3.7 User Changes**

Responsible: Participating Site Administrator Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to appropriately modify or delete users of SLCCoC HMIS.

**Policy Statement**

The Agency Administrator, or the employee’s immediate supervisor, must notify the HMIS Lead of a user’s termination from the agency, placement on disciplinary probation, or upon any change in duties not necessitating access to SLCCoC HMIS information within one business day of the occurrence. If a staff person is to go on leave for a period of longer than 30 days, their password should be inactivated within 24 hours of the start of their leave.

**Policy 3.8 User ID and Passwords**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to create and disseminate User IDs and passwords.

**Policy Statement**

Authorized users will be granted a unique user ID and password. Each user will be required to enter a User ID with a Password in order to logon to the system. User ID and Passwords are to be assigned to individuals. The User ID will be the work e-mail address of the user.

The initial, temporary password will be generated by the HMIS Lead and will be issued to the User by same. These passwords may be communicated in written or verbal form only. After logging in to the system for the first time with the temporary password, the new password the User selects must follow the specifications outlined on the ClientTrack screen. Passwords are case sensitive.

Forced Password Change will occur every year once a user account is issued. Passwords will expire and users will be prompted to enter a new password. Users may not use the same password consecutively, but may use the same password more than once.

**Policy 3.9 Password Recovery**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Last Revision: January 19, 2017

**Scope**

This policy establishes requirements to reset create and communicate a new user password.

**Policy Statement**

If a User unsuccessfully attempts to log onto the system five times, the User ID will be “locked out,” access permission will be revoked, and the User will be unable to gain access until their password is reset or their account is reactivated by the HMIS Lead.

The password will be reset by the HMIS Lead and communicated in written or verbal form to the user. The user will login with the given password and then set it to one of their own choosing.

**Policy 3.10 Use and Disposal of Exported Data**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes requirements for the exported and disposal of exported SLCCoC HMIS data.

**Policy Statement**

Users have the ability to download and save client level data onto their local computer. Once this information has been downloaded in raw format to an agency’s computer, the data then become the responsibility of the agency. A participating Agency must develop a protocol regarding the handling of data downloaded from SLCCoC HMIS.

The Participating Agencies shall establish internal extracted data protocols. Issues to be addressed include storage, transmission and disposal of the data.

**Policy 4.0 Data Collection, Quality Assurance and Reporting**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes Participating Agency requirements for data collection, quality assurance and reporting in SLCCoC HMIS.

**Policy Statement**

The HMIS Lead and SLCCoC HMIS Participating Agencies will apply the data collection, quality assurance and reporting standards set forth in the SLCCoC Data Quality Standards.

**Policy 4.1 Appropriate Data Collection**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCOC HMIS Board Last Revision: January 19, 2017

**Scope**

This policy establishes Participating Agency requirements for inputting data into the SLCCoC System.

**Policy Statement**

The purpose of the SLCCoC is to support the delivery of homeless and housing services in Scranton/Lackawanna County. The database should only be used to collect or track information related to meeting the client’s needs, the delivery of services and for policy development and planning purposes.

SLCCoC users will only collect client data that is

* relevant to the delivery of services,
* required by funders, or
* mandated by law.

**Procedure**

Agency Administrator will ask the HMIS Lead for any necessary clarification of appropriate data collection. The HMIS Lead, in consultation with the HMIS Committee and the CoC Board of Directors, will make decisions about the appropriateness of data being entered into the database. SLCCoC HMIS will periodically audit data quality to ensure the database is being used appropriately. This concern targets data elements that can be consistently tracked and reported, and does not specifically target the contents of case management notes or other fields not to be aggregated.

**Policy 4.2 Client Grievances**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes Participating Agency requirements for managing client grievances related to the SLCCoC HMIS.

**Policy Statement**

Clients shall have the right to an independent, impartial review of any complaints they may have regarding SLCCoC data collection, explanations offered for that collection, and policies surrounding the collection. They also have a right to know about this opportunity.

Agencies must make every good faith effort to assure that homeless clients are apprised of our obligation and their right. To that end each agency must adhere to the process for filing a formal grievance with the HMIS Lead should a client determine his or her SLCCoC HMIS data privacy rights have been compromised by the Participating Agency.

**Procedure**

Each Agency shall inform their clients of their SLCCoC HMIS data privacy rights by prominently displaying the SLCCoC HMIS Public Notice of Privacy wherever SLCCoC HMIS data is collected, as well as making the SLCCoC HMIS Privacy Notice available. In the event a client believes his or her SLCCoC HMIS data privacy rights have been compromised by the Participating Agency, (s)he should file a formal complaint by submitting a completed SLCCoC HMIS Grievance Form with the HMIS Lead. It is the responsibility of the Agency to ensure that the grievance form is readily accessible to clients. The HMIS Lead will research the written grievance and determine if there was a violation of SLCCoC HMIS data privacy rights. Should the HMIS Lead conclude that a breach has been made, she shall provide the Participating Agency with a timely plan of action for any correction that is necessary and addressing the issue with the staff involved. This may involve termination of user licenses and/or additional training.

**Policy 4.3 Required Data Collection**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes Participating Agency data collection requirements to be entered into the SLCCoC System.

**Policy Statement**

Providers funded by HUD are required to participate in the SLCCoC HMIS system to meet the HUD HMIS Data and Technical Standards. Other providers may choose to participate in the SLCCoC HMIS. All Authorized Agencies that participate in the SLCCoC HMIS are required to comply with HUD’s HMIS Data and Technical Standards unless those standards are in conflict with local laws. This includes the collection of required data elements.

If client refuses or is unable to provide basic information, providers shall, at a minimum, enter each client as an Anonymous entry into the SLCCoC HMIS. Authorized Agencies may choose to collect more client information for their own case management and planning purposes.

Timeliness of Data Entry: Quality assurance of timeliness is described in the SLCCoC Data Quality Plan, Appendix B. All HMIS Participating programs will ensure entry/exits, services, and Universal Data Elements are completed within 5\*\* business days of program entry/exits, with exceptions for emergency shelters, outreach programs, and legacy data. SLCCoC HMIS timeliness of data entry policy will not supersede more stringent CoC timeliness of data entry policies. Exceptions to these data collection policies are in place for organizations serving persons fleeing domestic violence; these organizations should request additional instruction from the HMIS Lead.

In order for the data contained within the SLCCoC HMIS to be useful for data analysis and reporting to funders, certain minimum data must be consistently collected throughout the system. In addition to the HUD required Data Elements, client level data is expected as well.

**Procedure**

All parties are subject to the SLCCoC HMIS Data Quality Plan, Appendix B, for determining procedural applications of the data collection policies and monitoring practices.

**Policy 4.4 Client Informed Consent**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes Participating Agency requirement to obtain client informed consent prior to inputting data into the SLCCoC HMIS.

**Policy Statement**

Each agency must post a sign at each intake or comparable location and on its web site (if applicable) explaining the reasons for data collection for those seeking services. Consent for entering of data into SLCCoC HMIS may be inferred when the proper privacy notice is posted and if the client accepts the services offered. The client has the option to opt out of allowing his or her identifying information to be added to the database. In that case, the client’s data should be added to SLCCoC HMIS without identifiers as described above, although the record should be tracked internally by the agency to minimize the number of duplicate records for one client. Electronic client data will be shared between agencies in accordance to the policies adopted by the SLCCoC Board of Directors. Client data may be shared through other means with written client consent or according to the privacy policy developed by the agency.

Privacy Policies should be in effect for each agency to both inform clients about the uses and disclosures of their personal data and to protect the agency by establishing standard practices for the use and disclosure of data. Each client must give permission for the disclosure and/or use of any client data outside of the privacy policy developed and posted by the agency. Client consent notices must contain enough detail so that the client may make an informed decision. Clients may withdraw permission to have their personal protected information shared in the SLCCoC HMIS, or may make a request to see copies of his or her client record.

**Procedure**

The HMIS Lead shall assume responsibility for monitoring Participating Agencies’ compliance. The results and the means of determining them will be shared with the HMIS Committee.

**Policy 4.5 Client Release of Information to Share Data**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes Participating Agency requirement to obtain client informed consent to share data in the SLCCoC HMIS.

**Policy Statement**

Each agency should include in its privacy policy that data collected by the agency is included in the SLCCoC HMIS as part of its administrative responsibility to its Continuum of Care and that aggregate, de-identified data may be used for analysis and reporting purposes. SLCCoC HMIS will only report aggregate and/or de-identified data as part of its responsibilities, and agrees to maintain the data with the highest level of confidentiality and within the security guidelines set forth in this document.

If a client declines data sharing permission, the user must take steps to restrict access to client data to the entering organization, immediately upon creation of the record.

**Policy 4.6 Data Ownership**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement and responsibilities connected to data ownership of data within the SLCCoC HMIS.

**Policy Statement**

The SLCCoC HMIS, and any and all data stored in the system, is the property of the HMIS Lead Agency. The HMIS Lead Agency has authority over the creation, maintenance, and security of the SLCCoC HMIS. Violations of the SLCCoC HMIS Agency Agreement, the SLCCoC HMIS Policies and Standard Operating Procedures, the Privacy Policies, or other applicable laws may subject the Authorized Agency to discipline and/or termination of access to the SLCCoC HMIS.

In order to ensure the integrity and security of sensitive client confidential information and other data maintained in the database, the HMIS Lead Agency will be responsible for data ownership.

**Policy 4.7 Data Entry Shared Information**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement and responsibilities connected to sharing client profile information within the SLCCoC HMIS.

**Policy Statement**

From CoC to CoC, there are different policies about sharing information maintained in client records. The SLCCoC HMIS has a policy to allow First Name, Last Name, Race, Gender and Date of Birth fields to be shared across providers. A Client Consent - Release of Information form, signed by the client, must be kept on file.

In order to continue building our SLCCoC HMIS and the collaboration between Participating Agencies, the Board is open to the differing needs and sensitivities of each Agency; however, we are supporting an OPEN system.

**Policy 4.8 Data Integrity**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement to ensure data integrity of SLCCoC HMIS.

**Policy Statement**

SLCCoC HMIS users will be responsible for the accuracy of their data entry. Authorized Agency leadership will be responsible for ensuring that data entry by users is being conducted in a timely manner and will also develop procedures to evaluate and increase the accuracy of the data entered.

The quality of SLCCoC data is dependent on individual users to take responsibility for the accuracy and quality of their own data entry. The HMIS Lead shall work with Agency Executive Directors and/or Agency Administrators in assuming responsibility for and in the monitoring of data quality for their own agency. It is in the interest of agencies and the CoC that all data collected have integrity since that data may be used for evaluation, reporting, monitoring, or funding purposes. In particular the data will impact funding opportunities during competitive SHP process. SLCCoC HMIS emphasizes, analyzes, and reports on data quality as a service to member agencies. All parties are subject to standards as determined in the SLCCoC HMIS Data Quality Plan, Appendix B.

**Procedure**

In order to test the integrity of the data contained in SLCCoC HMIS, the HMIS Lead will devise regular data integrity checks for the SLCCoC.

**Policy 4.9 Monitoring and Evaluation**

Responsible: SLCCoC HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement for monitoring and evaluating the SLCCoC HMIS.

**Policy Statement**

Accurate and consistent data entry is essential to ensuring the usefulness of the SLCCoC HMIS. Agencies will provide acceptable levels of timeliness and accuracy. Agencies without acceptable levels of data quality or timeliness may incur any sanctions negotiated by the Board until problems are addressed.

Data quality is an important aspect of SLCCoC HMIS, and must be maintained at the agency level and by users of the system. The HMIS Lead will monitor data quality as part of management functions.

**Procedure**

The HMIS Lead will develop and perform regular data integrity checks and will report on a regular basis.

**Policy 4.10 On-Site Review**

Responsible: HMIS Lead Effective Date: January 19, 2017

Authorized: SLCCoC Board Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement for an on-site review of SLCCoC HMIS.

**Policy Statement**

Annual review of each contracted agency will be the responsibility of the HMIS Lead.

Regular reviews enable the SLCCoC HMIS to monitor compliance with the Standard Operating Procedures Manual and the SLCCoC HMIS Agency Agreements.

**Procedure**

The exact procedures for on-site reviews will be determined by the SLCCoC HMIS Committee on an annual basis.

**Policy 4.11 Client Request for Data**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC HMIS Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement for managing a client’s request for their SLCCoC HMIS data.

**Policy Statement**

Any client may request to view, or obtain a printed copy of his or her own records contained in SLCCoC HMIS. The client will also have access to a logged audit trail of changes to those records. No client shall have access to another client’s records in SLCCoC HMIS.

The data in SLCCoC HMIS is the personal information of the individual client. Each client has a right to know what information about him or her exists in the database, and to know who has added, changed or viewed this information, and when these events have occurred. This information should be made available to clients within a reasonable time frame of the request.

**Procedure**

A client may ask his/her case manager or other agency staff to see his or her own record. The case manager, or any available staff person with SLCCoC HMIS access, will verify the client’s identity and print all requested information. The case manager can also request a logged audit trail of the client’s record from the HMIS Lead. The HMIS Lead will print this audit trail; give it to the case manager, who will give it to the client. The client may request changes to the record, although the agency can follow applicable law regarding whether to change information based on the client’s request. A log of all such requests and their outcomes should be kept on file in the client’s record.

**Policy 4.12 Release of Data for Public Use**

Responsible: Participating Agency Effective Date: January 19, 2017

Authorized: SLCCoC HMIS Last Revision: January 19, 2017

**Scope**

This policy establishes the requirement for managing public requests for SLCCoC HMIS data.

**Policy Statement**

Any requests for information from an individual or group who has not been explicitly granted access to SLCCoC HMIS will be directed to the HMIS Committee. Requests for data at the Continuum of Care level will be directed to the HMIS Lead. No individual client data will be provided to any group or individual that is neither the Authorized Agency that entered the data or the client him or herself without proper authorization or consent.

The HMIS Lead will release routine aggregate reports for the larger community, which will address, but are not limited to, descriptive and demographical statistics. In instances where SLCCoC HMIS is mandated contractually to provide HMIS data, reports will be provided for purposes of monitoring services delivery and/or program evaluation. The content of these reports will reflect a commitment to client confidentiality and ethical data use. No individual client data will be provided to meet these requests without proper authorization or consent.

**Procedure**

As part of the mission to end homelessness in Lackawanna County, it is SLCCoC HMIS’s policy to provide aggregate data on homelessness and housing issues in this area. SLCCoC HMIS will also issue periodic routine public reports. No individually identifiable client data will be reported in any of these documents. Wherein the SLCCoC HMIS is contractually obligated to provide de-identified data to funders for program monitoring and evaluation, the HMIS Lead shall prepare and submit reports to the appropriate bodies.

All requests for data from anyone other than an Agency or a client, which cannot be satisfied by either of the aforementioned conditions, will be directed to the SLCCoC HMIS Committee for a recommendation to the Board. The Executive Committee may act on behalf of the Board to expedite urgent requests.

 **Appendix A**

**Scranton/Lackawanna County Continuum of Care**

**Board Membership**

|  |  |
| --- | --- |
| Sr. Therese Marques, RSMExecutive DirectorCatherine McAuley Center430 Pittston AvenueScranton, PA 18505570-342-1342 |  Mr. Stephen NocillaDiocesan Director of HousingCatholic Social Services504 Penn AvenueScranton, PA 18509570-955-5517 |
| Tara FinnertyExecutive DirectorCommunity Intervention Center445 N. 6th AvenueScranton, PA 18503570-342-4298 | Craig HoenieStaff AttorneyNorth Penn Legal Services33 North Main StreetPittston, PA 18640570-299-4100 |
| Tricia ThomasExecutive Director Boys and Girls Club of NEPA609 Ash StreetScranton, PA 18509570-342-8709 | Joseph HollanderExecutive DirectorScranton Primary Health Care Center959 Wyoming AvenueScranton, PA 18509570-344-9684 |
| Ruma MarshallFamily and Maternity DirectorSt. Joseph’s Center320 S. Blakely StreetDunmore, PA 18512570-496-4200 | Michael HanleyChief Executive OfficerUnited Neighborhood Centers777 Keystone Industrial Park Rd.Scranton, PA 18509570-346-0759 |
| Crystal ArcareseHousing for the Homeless Veteran CoordinatorVeteran’s Administration Medical Center1111 East End Blvd.Wilkes Barre, PA 18711570-824-3521 x 7742 | Peg RuddyExecutive DirectorWomen’s Resource CenterP.O. Box 975Scranton, PA  18501570-346-4460 |

**Appendix B**



**Scranton/Lackawanna County Continuum of Care**

**Data Quality Plan**

December 1, 2016

Developed by:

SLCCoC HMIS Committee

The Scranton/Lackawanna County Continuum of Care has developed a written policy and procedure for entering data into the local Homeless Management Information System. The purpose of this plan is to ensure accurate and complete information to report on the homeless population being served by the PA-508 Continuum. All SLCCoC participating agencies will adhere to the protocol described to meet data quality requirements. This plan describes the timeliness, completeness, accuracy, monitoring, incentives and enforcement policies to be followed.

1. Timeliness: The timeliness component of the data quality plan is documented to ensure that data is accessible when needed and also to avoid any incorrect data due to postponement of entering universal and program specific elements.

CoC Programs:

Transitional and Rapid Re-Housing Programs

\* Entering Data: All Universal and Program Specific Data Elements will be entered into HMIS within one week of intake

\* Exiting Data: Clients will be exited from HMIS within three working days after the client(s) exited the program.

\* All HUD Assessments will be updated annually within 30 days of the anniversary date for program entry.

Permanent Supportive Housing Programs

\* Entering Data: All Universal and Program Specific Data Elements will be entered into HMIS within one week of intake.

\* Exiting Data: Clients will be exited from HMIS within three working days after the client(s) exited the program.

\* All HUD Assessments will be updated annually within 30 days of the anniversary date for program entry.

ESG Programs:

Emergency Shelters - Including Night-by-Night’s (NBN’s):

\* Entering Data: All Universal and Program Specific Data Elements, including Universal Data, Barriers and Domestic Violence Assessments as well as “Contact” & “Date of Engagement” information, will be entered into HMIS within two days of intake.

\* Exiting Data: NBN’s leaving without an exit interview will record “Exit Destination” as “No exit interview completed”. All other shelters will exit clients within three working days after the client has exited the program.

\* An annual assessment will be conducted for all persons in a project for one year or more.

Prevention:

\* Entering Data: All Universal and Program Specific Data Elements, Including “Housing Assessment at Exit” will be entered within 24 hours of receiving assistance.

 Re-evaluations/updates will be performed on prevention clients once every three months.

Rapid Re-housing:

\* Entering Data: All Universal and Program Specific Data, including “Residential Move-In Date” will be entered at project entry.

\* Exiting Data: Client will be exited from HMIS within three working days after exiting the program.

\* All assessments will be updated annually.

Outreach:

\* Entering Data: Outreach projects will record every contact made with client in HMIS. All Universal and Program Specific Data, including “Contact” & “Date of Engagement” will be entered into HMIS at the point when the client has been engaged by the outreach worker.

\* Exiting Data: Client will be exited from HMIS after three months of no contact.

Support Services Only

\* Entering Data: All Universal and Program Specific Data Elements will be entered into HMIS within one week of intake

\* Exiting Data: Client(s) will be exited from HMIS quarterly.

2. Completeness:

The Continuum’s goal is to collect 100% accurate data. Comprehensive data supplies the CoC with a clear picture of the clientele they are serving, fulfills funding/compliance requirements and plays a vital role with future planning. However, the CoC understands that collecting 100% of all data elements may not be possible in all cases and scenarios. The CoC has established an acceptable range of unknown/don’t know/refused responses between 1 and 5% for each data element. The CoC has agreed to establish a 0% allowable null/missing data for universal elements because all elements are a requirement in HMIS. (Please refer to data quality monitoring tool for details on specific elements)

All data is completely and accurately entered into HMIS. The HMIS staff administrator runs monthly data quality reports which are reviewed monthly. If corrections need to be made, staff and agencies will have 10 working days to complete. If compliance has been achieved no changes should be necessary.

Example: If the data element for veteran status is unknown for emergency shelters is 1% or less, the data is complete and no changes need to be made. If veteran status is unknown for emergency shelters is greater than 1%, the data is incomplete and needs to be corrected.

2.1 Completeness: All Clients Served – The PA-508 CoC must ensure that all clients being served are entered into HMIS. If a program only enters some clients and not all clients, the data is not representing our homeless population accurately. Therefore, 100% of all homeless residential clients are to be entered into HMIS detailing the clients’ specific situations. 100% of all homeless program participants will have the services data entered into HMIS.

2.2 Completeness: Bed Utilization Rates- Staff enters a client into HMIS and they are assigned to a program until they are exited. Once a client is exited, the bed or unit becomes free. The bed utilization rate is the # of beds occupied divided by the # of total beds. If a program has a low rate it could mean that the facility was not full or it could mean that the clients were not entered properly. High rates could mean that a program was over capacity on a given night or it could mean that clients are not being exited. Programs are assigned a maximum bed/unit capacity and should abide by those rules unless there are unusual circumstances that can be explained. Staff must ensure that the number of clients they are serving in any given program, matches the number of clients for that program in HMIS.

3. Accuracy – Information entered into HMIS needs to accurately reflect any/ all of the people that enter any of the homeless programs. Inaccurate or false data/information is worse than having missing data. Agencies and staff should understand that it is better to enter nothing (or preferable don’t know or refused) than to enter false information. To ensure correctness, data entry errors/mistakes should be edited on a monthly basis. Data in HMIS must also match the client file. Example: The date a client physically left the program should be the same in HMIS and on client paperwork.

4. Consistency- All data should be collected and entered on a consistent basis across all programs. If data is not collected and entered on a consistent basis, information may be lost or inaccurate. All intake and data entry workers will complete an initial training before entering any information into the live database. Definitions of specific data elements will also be available so as to ensure staff is collecting the exact information that funders are looking for. New agencies that join the CoC as well as new staff will review this document as part of the HMIS Agency Agreement.

5. Monitoring-Monitoring will be conducted to ensure that HMIS data quality is valid. All HMIS agencies are expected to meet the data quality benchmarks described on the monitoring tool. HMIS data will be monitored on a monthly basis to quickly identify any issues. To ensure that users understand the process of the data quality plan, the following protocol will be used from month to month.

a. HMIS end users should have all data entered into the system within one week of the intake.

b. Data quality reports will be run by the 2nd Thursday of every month by the HMIS staff.

c. Data quality reports will be reviewed by the HMIS sub-committee on a monthly basis, either at an HMIS meeting or via e-mail.

d. Providers will have 10 working days from the time the sub-committee’s Data Quality Report is distributed to correct the data.

e. Brief overview of the progress of the data quality will be discussed at the following CoC meeting after corrections have been made.

f. If agencies fail to meet the data quality benchmarks even after the corrective period, agencies will have to explain why they have not met these requirements and the CoC shall take necessary actions as the members see fit.

6. Incentives and Enforcement-

\* Incentives: The Continuum of Care proposed that some incentives for timeliness, completeness, accuracy, consistency of data are as follows:

o Agencies will have recognition at CoC Meetings

 o Data Quality may be used as a program performance metric

o Each Agency within the Continuum of Care is encouraged to come up with their own incentives for their respective agencies.

* Enforcements: The Continuum of Care proposed that if agencies do not comply with this data quality plan, the future funding of projects operated by that agency will be in jeopardy, or, if agency participation is optional, agency may be prohibited from using HMIS.

Domestic Violence Provider

Data Quality Plan

\* The Lackawanna County Continuum of Care’s Domestic Violence provider, in accordance with the protocol and procedures set in place by the Lackawanna County CoC will adhere to the following components of the Data Quality Plan:

o Timeliness –

\* Emergency Shelter Programs: The DV provider will enter data into an HMIS comparable database within 24 hours of intake

\* Transitional Housing Programs: The DV provider will enter data into an HMIS comparable database within one week of intake

o Completeness –

\* The DV provider will collect 100% of data elements unless an individual being served reports an unknown, don’t know or refusal element. In that instance, the DV provider will stay within the 1 and 5% compliance.

\* 100% of all homeless participants served through the DV provider will be entered into the HMIS comparable database.

\* The DV Provider will ensure that the number of participants they are serving in a program match the number of participants for that specific program in Housing Index as reported to the CoC.

o Accuracy -

\* Information entered into the DV providers HMIS comparable database will reflect any/all of the individuals that enter any of the homeless programs. Data in the HMIS comparable database will be the same as the data in the participants file.

o Consistency –

\* The DV provider will collect and enter all data on a consistent basis across all programs. The provider will ensure that all data entry workers complete training on the HMIS comparable database prior to entering any information into the database. A document that outlines basic information needed for the accurate collection of information will match intake forms.

o Monitoring –

\* The DV provider will strive to meet the data quality benchmarks as described on the monitoring tool and will follow the protocol as outlined in the Data Quality Plan. The DV provider will monitor their own data quality at least quarterly and correct any missing or don’t know/don’t have data values that are above the benchmarks for said values.

