Homeless Management Information System

Homeless Management Information System

Kansas Balance of State CoC & Johnson County CoC

Policies & Procedures

VERSION 3.0

JoCo CoC Approved: September 13, 2023
KS BoS CoC Approved: September 26, 2023

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Summary of Terms

Below is a list of terms and acronyms that are used in this document. It is important to understand the meaning of these terms and acronyms before you can fully understand the concepts explained in this document.

Term	Definition of Term/Acronym
HMIS Lead Agency	**This agency manages, administers, and operates HMIS on behalf of the CoC.**
Agency & User Participation Agreement	**The purpose of this HMIS Agency and End User Agreement is to document and communicate the requirements for the access and utilization of the Homeless Management Information System (HMIS) for the Kansas Balance of State Continuum of Care (KS BoS CoC) and Johnson County Continuum of Care (JoCo CoC) by Agencies and End Users. The Agency must agree to the terms of the agreement for each HMIS End User license within the KS BoS CoC and/or JoCo CoC.**
(HMIS) End User	**Agency staff that has completed all required trainings, signed an agency & user agreement, and currently has access to their user profile for the purposes of inputting or using HMIS data or a comparable database.**
New User	**An individual who does not have an existing HMIS – Clarity Human Services user profile, has recently received a profile, or is awaiting to receive their profile information.**
CHO	**Covered HMIS/Homeless Organization**

Summary of Terms

Term	Definition of Term/Acronym
Agency Primary/ Secondary Contact	The individuals that are employed with the CHO and have taken on the responsibility to be the primary and secondary contacts on the agency's behalf in relation to HMIS.
HMIS Administrator/ Coordinator	Individual or team that manages and supports the operation of HMIS. You can visit the staff page of the KSHC website to see who this person is or people are currently for your CoC. A link to this website can be found on the **Resources** page.
Data Quality Plan	This document describes the Homeless Management Information System (HMIS) data quality plan for a CoC. The document includes a data quality plan and protocols for ongoing data quality monitoring that meets requirements set forth by the Department of Housing and Urban Development (HUD).
Governance Charter	Charter that establishes the governance structure for the operation of the HMIS. It's primary purpose is to articulate the CoC's decision making process for its HMIS.
ROI	Release of Informatioin
JoCo CoC	Johnson County Continuum of Care
BoS CoC	Balance of State Continuum of Care

Resources

Definition of Term/Acronym	Resource Link
A great place to familiarize yourself with the BoS CoC and the current things that the team is working on. You can also find trainings and helpful resources on the HMIS portion of the website.	**Kansas Statewide Homeless Coalition Website**
A training series that is part of the training requirement for access to HMIS as a new user and can be revisited at any time as a refresher.	**Bitfocus New User Training**
This manual provides the detailed information required for system programming on all HMIS elements and responses required to be included in HMIS software. It delineates data collection requirements, system logic, and contains the XML and CSV tables and numbers. The manual also includes critical information about data collection stages, federal partner data collection required elements, and metadata data elements.	**HMIS Data Dictionary** **Commonly used by HMIS Vendors & HMIS Lead Agencies**
This manual provides a review of all the Universal Data Elements and Program Descriptor Data Elements. It contains information on data collection requirements, instructions for data collection, and descriptions that the HMIS End User can use as a reference.	**HMIS Data Standards Manual** **Commonly used by HMIS Lead Agencies & HMIS End Users**
This Glossary is designed to provide HMIS systems, and their programmers, a foundation upon which they can best program HMIS– required reports.	**HMIS Standard Reporting Terminology Glossary** **Commonly used by HMIS Vendors & HMIS Lead Agencies**

Introduction to HMIS

HOMELESS MANAGEMENT INFORMATION SYSTEM

In 2001, Congress instructed the U.S. Department of Housing and Urban Development (HUD) to take measures to improve available data concerning homelessness in the United States. In response, HUD mandated all Continuum of Care (CoC) regions to implement region-wide databases that would allow an unduplicated count of clients served. Out of this directive came the Homeless Management Information System (HMIS), a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance service agencies and stores that data in a centralized database for analysis.

HMIS captures information about the numbers, characteristics, and needs of homeless persons and those at risk of homelessness over time. It is essential for streamlining client services and informing public policy decisions aimed at addressing and ending homelessness at local, state, and federal levels.

Through HMIS, persons experiencing homelessness benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in Kansas, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary for service and systems planning, effective resource allocation, and advocacy.

The purpose of these HMIS Policies and Procedures is to document and communicate the requirements for the access and utilization of the Homeless Management Information System for the Kansas Balance of State Continuum of Care and Johnson County Continuum of Care. Further, the comprehension and agreement to abide by these Policies and Procedures are required in order to gain access to the HMIS for Kansas BoS and JoCo CoC.

HMIS SOFTWARE

Each CoC must decide on a HMIS Software and Vendor. It empowers human service providers, agencies, coalitions, and communities to manage real-time client and services data. The selected software vendor and HMIS (or comparable database) system must meet all HUD and other federal partners' regulations and policies, and the following requirements:

- Ensure the HMIS design meets the federal HMIS Data Standards.
- Develop a code book and provide other documentation of programs created.
- Provide ongoing support to the HMIS Leads pertaining to the needs of end users to mine the database, generate reports, and other interface needs.
- Administer the product servers, including web and database servers.
- Monitor access to HMIS (or comparable database) through auditing.
- Monitor functionality, speed, and database backup procedures.
- Provide backup and recovery of internal and external networks.
- Maintain the system twenty-four hours a day, seven days a week.
- Communicate any planned or unplanned interruption of service to the HMIS Lead Agency.
- Take all steps needed to secure the system against breaches of security and system crashes.

HMIS VENDOR

Clarity Human Services ("Clarity") is a web-based HMIS software owned by Bitfocus, Inc. ("Bitfocus") and it has been designated as the HMIS software. It empowers human service providers, agencies, coalitions, and communities to manage real-time client and services data.

COMPARABLE DATABASE SYSTEM

The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that prohibit Victim Service Providers (VSPs) from using HMIS. However, VSPs that are recipients or subrecipients under the CoC's and ESG Programs are required to collect client-level data consistent with HMIS data collection requirements. To protect clients, VSPs must enter required client-level data into a comparable database that complies with all requirements outlined in HUD's Comparable Database Vendor Checklist.
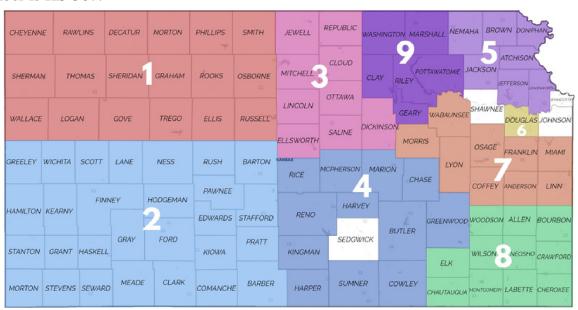
HMIS Continua of Care

KSHC COLLABORATION

The Kansas Statewide Homeless Coalition (KSHC) has entered into a Master Agreement for Services with Bitfocus Clarity Human Services to provide HMIS services to the Kansas Balance of State Continuum of Care (KS BoS CoC) and Johnson County Continuum of Care (JoCo CoC).

KANSAS BALANCE OF STATE COC

The Kansas Balance of State Continuum of Care covers 101 counties in Kansas, excluding Johnson, Sedgwick, Shawnee, and Wyandotte counties, who operate as individual county CoCs. To make for easier coordination, the CoC is separated into 9 different regions. Every CoC has it's own unique identifier that includes the state abbreviation and the designated CoC number. For the Kansas BoS that CoC number is KS-507.

The Kansas Housing Resources Corporation (KHRC) has been designated as the HMIS Lead Agency by the KS BoS CoC. KHRC has entered into a contractual agreement with KSHC to provide HMIS System Administration.

All operational agreements, policies, procedures, and protocols are reviewed annually by Kansas Statewide Homeless Coalition in collaboration with the HMIS Oversight Committee to comply with HUD HMIS Standards and improve HMIS implementation. The KS BoS CoC Steering Committee is responsible for the HMIS Lead Agency selection/evaluation and approval of the KS BoS CoC HMIS Policies and Procedures.

Please refer to the Roles and Responsibilities section for more details.

HMIS Continua of Care

JOHNSON COUNTY COC

The Johnson County Continuum of Care covers Johnson County in Kansas. To make for easier visualization, the CoC is showed below in relation to neighboring counties within the Kansas Balance of State and other CoC's. Every CoC has it's own unique identifier that includes the state abbreviation and the designated CoC number. The JoCo CoC number is KS-505.

JOHNSON COUNTY
CONTINUUM OF CARE

The Kansas Statewide Homeless Coalition (KSHC) has been designated as the HMIS Lead Agency by the KS-505 CoC. KS-505 CoC has entered into a contractual agreement with KSHC to provide HMIS System Administration. All operational agreements, policies, procedures, and protocols are reviewed annually by the KS-505 CoC Board in collaboration with the HMIS Oversight Committee to comply with HUD HMIS Standards and improve HMIS implementation. The KS-505 CoC Board acts on behalf of the broader CoC membership. The Board governs policies and procedures and directs the CoC more broadly. Relating to HMIS, the KS-505 CoC Board is responsible for the governance, oversight, and the HMIS Lead Agency selection/evaluation and approval of the HMIS Policies and Procedures. United Community Services of Johnson County, Inc (UCS) is the lead Planning Agency for the COC responsible for coordinating, convening, organizing, monitoring, and submitting financial applications on behalf of the CoC.

Stakeholder responsibilities are summarized within the KS-505 HMIS Governance Charter.

Please refer to the Roles and Responsibilities section for more details.

Kansas Statewide Homeless Coalition
www.kshomeless.com
2001 Haskell Ave, Lawrence, KS 66046

Policy Requirements

REGULATIONS AND STANDARDS

All individuals and agencies participating in HMIS must abide by these HMIS Policies and Procedures as well as all HUD regulations, and HUD Standards regarding the use of HMIS. Here are some helpful links and resources when understanding these standards and regulations. Please revisit the Resources page for a description of the contents of each document or use the link below to access the resource directly. The documents included below are typically reviewed and updated biannually by HUD, with changes effective October 1st, in line with the federal fiscal year.

FY 2024 HMIS Data Standards Data Dictionary

FY 2024 HMIS Data Standards Manual

FY 2022 HMIS Standard Reporting Terminology Glossary

PROGRAM MANUALS

HMIS Federal Partner Program Manuals are another great resource that contain additional detailed information on HMIS project setup and data collection for federally funded programs:

CoC Program Manual   HOPWA Program Manual   RHY Program Manual

ESG Program Manual   PATH Program Manual   VA Program Manual

FUNDING

Funding for the software and operations of the HMIS shall be provided by the HMIS lead agency through HUD CoC's program, HMIS grant as well as other funding from the CoC's and participating CHOs. In the event of a funding shortage it is the responsibility of the HMIS Lead Agency, the HMIS Oversight Committee and the CoC's Governing Body to explore options to increase revenue.

POLICY AMENDMENTS

HMIS Policies & Procedures will be reviewed and revised, at the minimum, on an annual basis. However, the HMIS Oversight Committee may amend privacy policy and practices at any time. An amendment may affect data that had been entered in the HMIS before the effective date of any such amendment. This policy is consistent with current privacy standards for HMIS issued by HUD.

HMIS Governance

CONTINUUM OF CARE

Each Continuum of Care is responsible for oversight, project direction, policy setting, and guidance for the HMIS project. The CoC 's oversight and governance responsibilities are carried out by the HMIS Oversight Committee (described below) who review and approve all HMIS policies and procedures.

It is the responsibility of the CoC 's to:
- Conduct outreach to homeless assistance agencies not using HMIS and encourage these agencies and other mainstream programs serving homeless people to participate in HMIS or a comparable database.
- Provide all local information as necessary for compilation of the Continuum of Care Housing Inventory Count (HIC) and coordinate and work alongside the HMIS Committees and the HMIS Lead Agency in preparation and submission of the System Performance Measures (SPMs) and the Longitudinal Data Analysis (LSA) reports.

COC GOVERNANCE

The KS- 507 BoS CoC Steering Committee and the KS-505 CoC Board have several HMIS responsibilities outlined in their CoC Governance Charters:
- Designate HMIS Lead Agency and HMIS software, based on recommendations from the HMIS Committees.
- Review and approve HMIS Policies & Procedures, including privacy, security, and data quality plans.
- Support and encourage the use of HMIS.
- Review and use HMIS data to inform local decision making.
- Review HMIS vendor contracts, to ensure compliance with HUD requirements.

HMIS LEAD AGENCY

The HMIS Lead is the eligible applicant designated by the CoC's, in accordance with the **CoC Program Interim Rule**, to manage the CoC's HMIS on the CoC's behalf.

The HMIS Lead Agency and/or its subrecipient manages and administers all HMIS operations and activities on behalf of the CoC's. Kansas Housing Resource Corporation (KHRC) currently serves as the HMIS Lead Agency for the Kansas Balance of State and currently contracts with Kansas Statewide Homeless Coalition to provide System Administration services to fulfill certain HMIS Lead Agency roles and responsibilities in accordance with a Memorandum of Understanding (MOU) between the two parties. The Kansas Statewide Homeless Coalition (KSHC) serves as the HMIS Lead Agency for the Johnson County Continuum of Care.

A. General
- Obtain and maintain the contract with the CoC's selected HMIS vendor.
- Notify and solicit feedback from the CoC's and HMIS Committees during vendor contract negotiation.

- Determine the parameters of the HMIS as it relates to continuity of service, limiting access to the data, housing responsibilities, general security and maintenance issues, data storage, back-up and recovery, customization, compliance with HUD data standards, reporting needs, training and technical support.
- Provide overall staffing for the operation of the HMIS.
- Develop and maintain all HMIS operational agreements, policies, and procedures on behalf of, and at the direction of, the HMIS committees.
- Monitor CHOs and users to ensure compliance with HMIS operational agreements, policies and procedures on behalf of, and in coordination with the HMIS Committees.
- Actively participate in the HMIS Oversight Committee meetings.
- Provide and maintain the HMIS website in conjunction with the CoC's selected HMIS vendor.
- Participate as a voting or non-voting member of the CoC's.
- Attend other HMIS Committee meetings as needed.
- Oversee compliance of the HMIS with all federal HMIS Standards (including anticipated changes to the HMIS Standards) and all other applicable laws.
- Apply as the project applicant for all HUD CoC Program HMIS Projects within the CoC's.
- Serve as the liaison with HUD regarding all HUD HMIS grants.
- Complete gaps analysis with Collaborative Applicant and Performance & Compliance Committee.
- Work with VSPs on meeting HUD's standards for a comparable database.
- Protect confidential data (in compliance with the federal HMIS standards, local privacy policies, Violence Against Women Act (VAWA), Family Violence Prevention and Services Act (FVPSA), Victims of Crime Act (VOCA) and other applicable laws) and abide by any restrictions clients have placed on their own data.

B. Software Administration
- Ensure the software vendor complies with the responsibilities outlined below in the HMIS Comparable Database Software Vendor section.
- Report any concerns with the software vendor to the HMIS Oversight Committee.
- Inform CoC's and CHOs how each software release will change or impact current workflow and operations.

C. Ensure Data Quality
- Ensure all client and homeless program data are collected in adherence to the HUD HMIS Data Standards, the HMIS Policies and Procedures, and additional local requirements.
- Develop and implement a data quality plan in conjunction with the HMIS Oversight Committee.

D. Reporting
- Work with the HMIS Oversight Committee and HMIS Lead Agency to ensure the completion of all required HUD reports.
- Work with Collaborative Applicant and ESG recipient to collect reporting and evaluation information for ESG allocation and performance evaluation.

HMIS OVERSIGHT COMMITTEE

A. Composition

The HMIS Oversight Committee is comprised of both the KS BoS CoC and the JoCo CoC Continuum of Care because they utilize the same vendor and system. Therefore, the HMIS Oversight Committee consists of the following BoS and JoCo chairs:

- KS- 507 HMIS Oversight Committee Co-Chair (CoC elected. If the individual is not part of the CoC Steering Committee, they are responsible for attending their meetings to participate as a non-voting member.)
- KS- 507 HMIS Lead Agency Representative(s) (Kansas Housing Resource Corporation staff)
- KS- 507 HMIS System Administrator (Kansas Statewide Homeless Coalition staff)
- KS- 507 ESG Program Director or Designee (Kansas Housing Resource Corporation staff)
- KS- 507 CoC Program Director or Designee (Kansas Statewide Homeless Coalition staff)
- KS-507 PATH Program Director or Designee (Kansas Department for Aging & Disability Services (KDADS) staff)
- KS- 507 VA Program Director or Designee (Robert J. Dole VA Medical Center staff)
- KS- 507 Coordinated Entry Lead Agency or Designee (Kansas Statewide Homeless Coalition staff)
- KS- 507 Victim Service Providers Designee (Kansas Coalition Against Sexual & Domestic Violence staff)
- KS- 505 HMIS Oversight Committee Co-Chair (CoC elected. If the individual is not part of the CoC Steering Committee, they are responsible for attending their meetings to participate as a non-voting member.)
- KS-505 SSVF Program Director or Designee (The Salvation Army)
- KS-505 CoC Lead Agency Program Director or Designee (United Community Services)
- KS-505 Other Agency Designee (elected by CoC Board)
- KS- 505 Person with lived experience

Nominations for the position will occur during the last regularly scheduled monthly call at the end of the calendar year in December. Nominations motions must be presented, seconded, and accepted by the nominee for the nomination to stand. Nominations will be placed on the agenda for the HMIS update during the following regularly scheduled meeting.

The HMIS Oversight Committee Chair will be elected by the CoC's on a regularly scheduled monthly meeting at the first meeting of the calendar year in January during the HMIS update portion of the agenda. Elections will be conducted by a simple vote unless it is necessary to utilize the chat feature of the virtual meeting platform for clarification of the vote. The nominee with the largest total of votes will be considered the HMIS Oversight Committee Chairperson for that calendar year.

B. Responsibilities

The HMIS Oversight Committee shall be the overall governing body for the HMIS implementation including but not limited to agency/end user access, user access levels, policies, procedures, protocols, security, data quality, data sharing, oversight, and training.

The HMIS Oversight Committee will:
- Recommend the HMIS Lead Agencies and HMIS Software.
- Monitor the HMIS Lead Agencies on an annual basis.
- Develop and recommend HMIS Policies and Procedures to the CoC's Governing Body.
- Provide support to agencies to ensure HMIS participation.
- Work with HMIS Lead Agencies and Collaborative Applicant to complete PIT count.
- Review gaps analysis and recommend changes (along with their designated Compliance Committee).

C. HMIS Compliance

Any concerns/issues presented to the HMIS Oversight Committee by any subcommittee or by either CoC's will be investigated regarding any violations of HMIS policies, procedures, protocols, or standards. In the event that the issues presented require modification of policies, procedures, protocols, or other aspects of the implementation, this committee is tasked with the responsibility to enact necessary changes. Any user(s)/agencies found to be in violation of policies, procedures of protocols or HUD and other federal partners standards will be subject to the process outlined in the Violation of HMIS Policies section of this document.

D. Data Quality

The HMIS Oversight Committee will perform routine data quality checks for HUD funded programs on a quarterly basis. Data will be reviewed to determine compliance with the established benchmarks for timeliness, completeness, accuracy, and consistency found in the HMIS Data Quality Plan. Findings will be reported to their designated Compliance Committee and presented at the appropriate monthly CoC's meeting.

E. Conflict of Interest

In situations where there is potential for a conflict of interest with members of the HMIS Oversight Committee, the member will either leave the call or enter a virtual breakout room until the conclusion of the discussion.

F. Meetings

The HMIS Oversight Committee meets on a weekly basis. Important HMIS policy items that emerge in between meetings will be handled by the committee via email, conference call or an online meeting. Committee members are required to attend all meetings. A majority of the Committee is one-half plus one of the members present at the meeting when the vote is taking place. If a committee member cannot attend the meeting, they should give advance notice and send an appropriate stand-in if possible.

COLLABORATIVE APPLICANT

The Kansas Statewide Homeless Coalition (KSHC) currently serves as the Collaborative Applicant for the KS BoS CoC and the United Community Services of Johnson County is the Collaborative Applicant for JoCo CoC. The Collaborative Applicant roles and responsibilities for HMIS are outlined in the KS BoS CoC Governance Charter is located at www.kshomeless.com

COVERED HOMELESS ORGANIZATION

The responsibilities of the Covered Homeless Organizations include:
- Comply with the HMIS Policies & Procedures and all related HMIS agreements.
- Enter all required data into the HMIS system, up to the standards outlined in the HMIS Data Quality Plan.
- Connect prospective users with HMIS staff for access to Clarity.
- Ensure users are not sharing usernames and passwords. This includes the use of company wide password management software.
- Submit a ticket for any changes to user or program status in a timely manner.
- Explain ROI, post HMIS Data Collection Notice, and provide Privacy Notice to clients upon request.
- Maintain and update primary and secondary contact information with the HMIS team by submitting a ticket.

HMIS Contact

The CHO's Executive Director or their designee must select at least one person to act as the Designated Agency HMIS Contact. The responsibilities of the Contact are to:
- Determine which staff members will have access to the HMIS.
- Provide updated agency information in a timely manner, for updates in the HMIS. This includes providing notification about new projects, new users, closed projects, and users that need their access removed.
- Understand and comply with funder data collection and reporting requirements.
- Inform the HMIS Lead Agency of any violations of HMIS policies and procedures.

Technology Requirements

Participating Agencies must meet the technical standards outlined below to participate in the HMIS:
- All computers and networks used to access HMIS must have virus protection software and firewall installed. Virus definitions and firewall must be regularly updated.
- Connection to the Internet is the sole responsibility of the Participating Agency and is a requirement to participate in the HMIS. Slow system response times that may arise as a result of slow internet connections cannot be controlled by the HMIS Lead Agency or the HMIS Vendor.
- Have a browser compatible with current HMIS software. The most up to date version of the following browsers are supported by Clarity: Apple Safari, Google Chrome, Mozilla Firefox, and Microsoft Edge.
- The equipment used to connect to the HMIS system is the responsibility of the CHO. Contributing CHOs will need to provide their own internal technical support for the hardware, software, and Internet connections necessary to connect to the HMIS system according to their own organizational needs.

Roles & Responsibilities

KS BOS COC HMIS & CES END USER COMMITTEE

A. Composition

The membership shall consist of all HMIS End Users throughout the Kansas Balance of State CoC including Coordinated Entry End Users.

B. Meetings

The HMIS End User Committee meets on a bi-monthly (every other month) basis on the first Wednesday of the month at 1:30pm. Updates and Communication about this Committee including the location are communicated via email. If you are not receiving these emails please <u>submit a ticket</u> to be added to the contact list.

JOCO COC HMIS END USER COMMITTEE

A. Composition

The membership shall consist of all HMIS End Users throughout the Johnson County CoC.

B. Meetings

The HMIS End User Committee meets on a monthly basis on the third Tuesday of the month.

BOTH HMIS END USER COMMITTEE RESPONSIBILITIES

These committees will meet to discuss implementation issues regarding system functionality. End users will provide feedback on the HMIS vendor's software (as well as comparable databases used by VSPs) and compliance with HUD's data regulations.

HMIS/COMPARABLE DATABASE SOFTWARE VENDOR

The selected software vendor and HMIS (or comparable database) system must meet all HUD and other federal partners' regulations and policies, and the following requirements:
- Ensure the HMIS design meets the federal HMIS Data Standards.
- Develop a code book and provide other documentation of programs created.
- Provide ongoing support to the HMIS Lead pertaining to the needs of end users to mine the database, generate reports, and other interface needs.

- Administer the product servers, including web and database servers.
- Monitor access to HMIS (or comparable database) through auditing.
- Monitor functionality, speed, and database backup procedures.
- Provide backup and recovery of internal and external networks.
- Maintain the system twenty-four hours a day, seven days a week.
- Communicate any planned or unplanned interruption of service to the HMIS Lead Agency.
- Take all steps needed to secure the system against breaches of security and system crashes.

HMIS END USER RESPONSIBILITIES

Please refer to the HMIS Agency & User Agreement for the most current responsibilities specific to End Users and CHO's.

DATA INTEGRITY

It is important that CHO's and HMIS System Administration can ensure data integrity within HMIS. This includes a safe and secure place to store information, as well as procedures to ensure that the information is not damaged or altered illicitly after being collected or imported. When information is exported out of HMIS, we must be able to retrieve this information without harming the data. The data that is exported should also be the same as it was when it was collected or imported. Any alterations made to data that change it's validity for purposes other than to accurately depict the client are considered a violation of Data Integrity.

Program Enrollments provide structure for data collection and data sharing. It is important that End Users are accurately capturing the information collected at Program Enrollment and are accurately accepting referrals under the following guidelines for Permanent Housing, including Rapid Re-Housing:

Project Start Date

To be admitted indicates the following factors have been met:

1) Information provided by the client or from the referral indicates they meet the criteria for admission;

2) The client has indicated they want to be housed in this project; and

3) The client is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.

CHART OF HMIS RESPONSIBILITIES

The chart below outlines the responsibilities of the different entities involved within the CoC's HMIS system, based on guidance found in the **HUD HMIS Lead Standards** document.

HMIS Lead Standard	HMIS Lead Agency	Collaborative Applicant/System Administrator	HMIS Oversight Committee	Covered Homeless Organizations
HMIS Governance			✓	
Management	✓			
Policies & Procedures	✓	✓	✓	✓
HMIS Participation	✓	✓	✓	✓
HMIS CHO's Monitoring	✓	✓	✓	
HMIS Software Vendor Management	✓	✓	✓	
Privacy & Security	✓	✓	✓	✓
System Administration		✓		
Technical Support		✓		
Training		✓		
Reporting	✓	✓	✓	✓
Data Analysis	✓	✓	✓	✓
Data Quality	✓	✓	✓	✓
Data Integration	✓	✓	✓	

Access to HMIS

HMIS END USER ACCESS

Both HMIS End Users for KS BoS CoC and JoCo CoC hold the following responsibilities:
- Complete and sign the Agency and User Agreement
- Complete the New User Training that can be found at the following link: LMS New User Training
  - HMIS training will be provided at no cost. This training is mandatory for all individuals creating and maintaining client records in HMIS, including enrollments, assessments, services, housing check-ins, accessing CES within HMIS, etc.
  - Proof of training completion is kept on file with the Kansas Statewide Homeless Coalition. Training must be completed once every two years unless the CoC's requires training to be completed sooner due to major changes in HUD HMIS Data Standards, best practices, or HMIS policies and procedures.
- Complete and submit a ticket to set up an HMIS account, fix any data errors, report security/privacy violations or questions regarding the system at the Help Desk Ticketing System at https://kshc.freshdesk.com/support/tickets/new.

If you are having issues accessing or creating an account in FreshDesk, the Help Desk ticketing system, please send an email to HMIS@kshomeless.com.

Note: Access and support for the comparable database used by VSPs within the **BoS CoC** is handled by the software vendor, Osnium. They may be reached via email at **support@osnium.com** or online at **www.osnium.com/support**. The Kansas Coalition Against Sexual & Domestic Violence also provides technical support at **oz@kcsdv.org**.

Note: Access and support for the comparable database used by VSPs within the **JoCo CoC** is handled by the software vendor, Apricot. If a user needs technical assistance, they request assistance through the Director of Grants and/or the Grants and Data Manager. If these individuals cannot assist with the technical issue, they escalate the issue to Apricot user support. This can be accessed by any Apricot user through live chat in the web-based system. Support can also be accessed through our assigned Apricot manager.

AGENCY & PARTICIPATION AGREEMENT

The Executive Director of the CHO must sign an HMIS Agency and User Participation Agreement before access is granted to HMIS. Signing of the HMIS Agency and User Participation Agreement is a precursor to project set up, training, and user access. This form must be signed and returned prior to project setup and user access. Understand that the HMIS Oversight Committee may immediately suspend access to any HMIS End User/HMIS Participating Agency for the purpose of investigating any suspicion of breaching this Agreement and any verified breach of this Agreement will result in immediate termination of access. Understand that the HMIS End User and/or Agency may terminate this agreement in writing by submitting a ticket to the HelpDesk ticketing system. This Agreement shall be in effect until terminated by either party in writing, until HUD regulatory requirements changes or HMIS Policies change requirements occur.

NEW USERS

Before receiving access to HMIS, new users must complete the following steps:
- **Agency and User Participation Agreement**

HMIS System Administration staff will provide the agreement, as well as a copy of the HMIS Policies & Procedures.
- **HMIS Trainings**

Each end user must complete the required HMIS trainings, which currently include:
KS BoS & JoCo 2024 New User Training

INACTIVE & DELETED USERS

Inactive Users

An End User status can be Inactive in HMIS if the user has not logged into their account within a 60 day time period in which the system will automatically send End Users a notification within five days of their account being labeled "Inactive". Once an End User is considered Inactive by the HMIS System, the user will no longer be able to log into HMIS. The End User can prevent this by logging into the HMIS System at least once per 60 calendar days. If an End User account is labeled as inactive or the user is not able to access their account, a Help Desk Ticket should be submitted using the link provided in the HMIS Technical Support Section below.

Deleted Users

An End User account will be deleted from the HMIS System if and when the Agency Primary/Secondary Contact informs the HMIS team by submitting a HelpDesk ticket that the user is no longer employed with the Agency.

The HMIS Oversight Committee has the ability to change an End User's status to Inactive if a violation of the current policies or agreements occurs. The HMIS Oversight Committee will then discuss the violation at the next scheduled meeting before reaching out to the End User and any other necessary parties with a result of the violation, which can include termination of access.

The HMIS Oversight Committee will also delete End User accounts that have not been accessed within 120 days on a quarterly basis. Communication will be initiated by HMIS System Administration staff 30 days before the End User account is deleted. The End User and the Primary/Secondary Contacts for the Agency at which the End User is employed, will be contacted once via email to rectify the user account status. If the End User and/or the Primary/Secondary Contact do not return contact within the 30 days of contact otherwise defined in communication, the End User profile will be deleted. The End User will then need to submit a HelpDesk ticket to reestablish HMIS access if necessary.

HMIS TECHNICAL SUPPORT

HMIS Help Desk- FreshDesk

The KSHC HMIS Team is here to support you with any questions, concerns, issues, and/or requests that you may have. The best and most effective way to reach us is via our ticketing system: FreshDesk. FreshDesk is an online portal that allows you to create an account and access any existing tickets that you may have submitted in the past. Click: FreshDesk to submit any CES or HMIS tickets and remember to fill in as many fields as you can. If you are not able to access your FreshDesk account to submit a ticket, please send an email to HMIS@kshomeless.com.

HMIS staff will respond to all inquiries within three (3) business days. Issue resolution may require additional time if the ticket is escalated to the HMIS vendor. Technical support hours are Monday through Friday (excluding holidays) from 8:00 AM to 5:00 PM.

HMIS System Administration staff are available for additional technical assistance via Zoom calls, dependent on schedules and capacity. Please utilize existing training materials at **help.bitfocus.com** and **www.kshomeless.com/hmis** prior to making a request. Submit A Help Desk ticket for scheduling.

LIMITATIONS TO ACCESS

No active employee within a law enforcement entity, corrections center, or detention center can be granted direct access to HMIS. This includes but is not limited to any active member/representative of the following agency categories:

- Parole/Probation Officers
- Court Proceeding Staff
- Any and all jail/prison staff (no matter the purpose of transition/rehabilitation plans)
- Any Federal, State, & Local Law Enforcement
- Any other staff members that meet these criteria that are not listed at these agencies

Any active employee that meets these standards are prohibited from completing HMIS training and/or gaining end user access.

Any exception to these standards via a court-ordered, or otherwise mandated request for information will be approved on a case-by-case basis. These exceptions will need to be signed by a judge and/or other entity that ensures the validity of the request. These mandated requests will only include the information that is necessary to satisfy the mandated request. No other HMIS data will be provided that is not necessary for the purpose of fulfilling the **minimum required** elements of the mandated request.

The HMIS Oversight Committee has the right to deny access to any potential user and/or agency if there is a known potential threat to the client information stored in HMIS.

Public Health Emergencies

Public Health Agencies responding to a public health emergency have the ability to request information that is stored within HMIS or request access to HMIS. Both indirect and direct access to HMIS would only be for the purpose and duration of coordinating care for those experiencing or at risk of experiencing homelessness during a Public Health Emergency. Violation of any current agreements or policies regarding HMIS access may also result in a termination of access.

Data Privacy & Security Policies

The goal of the Data Privacy & Security Policies is to ensure confidentiality and security of all client data captured in HMIS in conformity with all current regulations related to privacy and data confidentiality rights. These policies are applicable to all entities with access to data within the HMIS implementation. The HMIS Lead Agency will maintain HMIS data using lawful and fair means. CHO privacy policies will include a provision stating the CHO will only collect data with the consent of their clients. Any client seeking assistance from a CHO will be notified through a signed consent form that data collection will occur. The HMIS Lead Agency will assume that client information in the Kansas Balance of State and/or Johnson County Continuum of Care HMIS has been entered with the consent of the client according to these policies and procedures. All CHOs will keep copies of the signed consents on file. Individual CHOs may maintain stricter policies relating to client consent to collect and share data with the HMIS Lead Agency.

CLIENT RELEASE OF INFORMATION

Data sharing, whether it be within the CoC's or between CoCs, is a process guided by the client through the Release of Information (ROI). It is therefore imperative that the client understand the ROI, and that the CHO addresses any questions the client may have, while respecting the client's right to decline to share data. Prior to designating any information for sharing with other agencies, the CHO will obtain the informed, written consent of the client, using the HMIS Release of Information. If a client does not consent pursuant to the HMIS Release of Information form, information may be entered into HMIS, but may not be shared with other CHOs. It is the responsibility of the CHO entering information about a client to determine whether consent has been obtained; to make appropriate entries to either designate the information as appropriate for sharing or prohibit information sharing; and to implement any restrictions on information sharing.

ROI Standards

1. **The CHO will use the HMIS Release of Information form (ROI), for all clients.**
2. **The CHO will be responsible for ensuring that consent is thorough, informed, and given by a person competent to provide consent. For example, in the case of a minor, the CHO will comply with applicable laws regarding minor consent by obtaining the consent of a parent or guardian, unless the consent of the minor is acceptable under Kansas law (K.S.A. 38, Article 1). In cases of adults subject to guardianship or conservatorship, the CHO must obtain consent from a person authorized to consent under Kansas law (K.S.A. 59, Article 30).**
3. **If a client withdraws or revokes consent for release of information, verbally or in writing, the CHO is responsible for immediately submitting an HMIS help desk ticket to ensure that the client's information will not be shared with other CHOs from that date forward.**
4. **If an ROI has been properly recorded in the client's HMIS record by another CHO, the CHO need not present the client with another ROI form. However, HIPAA Covered Entities must always present a ROI form, as detailed in the section below. Other CHOs may elect to do so at their discretion.**

Additional Responsibilities of HIPAA Covered Entities
CHOs that are also Covered Entities under HIPAA and any program subject to 42 CFR Part 2 must obtain a signed HMIS Release of Information form before authorizing HMIS staff to use or disclose information entered into the HMIS. If a client does not sign the HMIS Release of Information form, information may be entered into HMIS, but may not be further disclosed. Although program participants are not required to participate in HMIS, they will need to provide personal information in order to be determined eligible for particular resources. The information may be used by HMIS staff as permitted by law and the HMIS Data Privacy Notice. It is the responsibility of the CHO entering information about a client to ensure compliance with HIPAA, including: ensuring that all appropriate HIPAA Notices have been provided to clients; determining whether consent has been obtained; making appropriate entries to either designate the information as appropriate for use or disclosure by the HMIS Lead Agency or to prohibit such use or disclosure; and implementing any restrictions on the use of the information.

DATA COLLECTION NOTICE

The Data Collection Notice provides a brief overview of data privacy. It must be posted and viewable by clients at each intake desk or comparable location to provide information on their rights and HMIS policies related to personal data.

DATA OWNERSHIP

The data entered into the HMIS is owned by the CHOs responsible for entering client level information. Clients reserve the rights to a copy of their information in HMIS, correct mistakes to their data, and refuse elements of their information being entered into HMIS. If a CHO decides to terminate its use of the HMIS, the client data will be maintained in the HMIS. The CoC's, HMIS Lead Agency, HMIS staff, and all CHOs are jointly responsible for ensuring that the HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data comply with the HMIS Privacy, Security, and Confidentiality Policies and Procedures. Use of aggregate level data decisions will reside with the HMIS Oversight Committee.

DATA RELEASE

Data release refers to the dissemination of aggregate or anonymous client-level data for the purposes of system administration, technical support, program compliance, and analytical use. No identifiable client data will be released to any person, agency, or organization for any purpose without written permission from the client. Aggregate data may be released without agency permission at the discretion of the HMIS Oversight Committee. It may not release any personal identifiable client data to any group or individual.

The HMIS Lead Agency and HMIS Oversight Committee will work collaboratively for all required HUD reporting. Any other data requests must be submitted through the HelpDesk by submitting a ticket. All requests will be considered by the HMIS Oversight Committee. Fees may be applicable depending on the request.

DATA PRIVACY NOTICE

The HMIS Data Privacy Notice provides more detailed information about why HMIS data is collected, how the collected data will be used, when and to whom data may be released, privacy protections, and client rights. It must be reviewed with all clients at intake to provide information on their rights and HMIS policies related to personal data.

VASH IMPORT

A Homeless Management Information System (HMIS) is essential for communities to understand how the homeless response system is working and where strategic changes should be made to better serve people experiencing homelessness, including veterans. HUD and the U.S. Department of Veterans Affairs (VA) launched a HUD-VASH HOMES to HMIS Translator Tool for Continuum of Cares (CoCs) to support direct uploads of VA's HOMES-HMIS HUD-VASH Universal Data Elements Report to HMIS.

Purpose

This policy seeks to provide guidance for local homeless Veteran service providers to improve information sharing across programs and systems, strengthen the targeting of resources based on a shared prioritization system, and create more efficient systems for ending Veteran homelessness within their communities. These local providers primarily include members of Continuums of Care funded by the US Department of Housing and Urban Development (HUD) and staff of US Department of Veterans Affairs (VA) medical centers.

GRIEVANCE

If a client believes that their rights have been violated related to their personal or private data held in the HMIS, a written complaint may be filed. The complaint may be filed with the CHO serving the client and forwarded to the HMIS Lead Agency if resolution is not found. If the client believes that their shelter or services may be threatened due to the complaint, a complaint may be made directly to the HMIS Lead Agency. The HMIS Lead Agency will report all grievances to the HMIS Oversight Committee, which will act as a final arbiter of any complaints not resolved by the CHO or the HMIS Lead Agency. The CHO and the HMIS Lead Agency are prohibited from retaliating against clients for filing a complaint. Identifying information will be kept confidential unless the client gives express permission for such information to be shared between the CHO and the HMIS Lead Agency.
The CHO must take the HMIS Grievance Form available to clients upon request. This form can be found at kshomeless.com/hmis-grievance.

SECURITY REVIEW

HMIS primary and secondary contacts are responsible for completing an annual security review to ensure the implementation of the security requirements for their CHO and Participating Agencies. The annual security review will include the completion of the HMIS Security Certification Checklist by each participating CHO ensuring that each security standard is implemented. The HMIS Security Certification Checklist is to be completed and submitted in a HelpDesk Ticket annually by August 1st of each year. The CoC's Governing body have selected the HMIS Oversight Committee to serve as security review officers. Security Review Officers will ensure that an annual security review for each CHO is completed annually and meets the minimum requirements in accordance with all current policies and agreements.

SECURITY VIOLATIONS & SANCTIONS

Any end user/agency found to be in violation of security protocols of their agency's procedures or HMIS Policies and Procedures will be subject to the process outlined in the Violation of HMIS Policies section of this document. All end users/agencies must report potential violation of any security protocols.

- End users are obligated to report suspected instances of noncompliance and/or security violations to their agency and/or HMIS staff as soon as possible.
- The CHO or HMIS staff will investigate potential violations.
- Any end user/agency found to be in violation of security protocols will be sanctioned accordingly. Sanction may include suspension or revocation of system privileges.

USE & DISCLOSURE

Client data may be used or disclosed for system administration, technical support, program compliance, analytical use, and other purposes as required by law. Data use involves sharing parts of client information with persons within an agency. Data disclosure involves sharing parts of client information with persons or organizations outside an agency. HMIS data may only be used or disclosed for activities described in this section.

- CHOs may use data contained in the system to support the delivery of services to homeless clients within the CoC's. Agencies may use or disclose client information internally for administrative functions, technical support, and management purposes. CHOs may also use client information for internal analysis, such as analyzing client outcomes to evaluate programs.
- The vendor and any authorized subcontractor shall not use or disclose data stored in HMIS without express written permission to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes. The Service and License Agreement signed by both the HMIS Lead Agency and vendor contains language that prohibits access to the data stored in the software except under the conditions noted above.

The HMIS Lead Agency requires that CHOs notify individuals seeking their assistance that data collection, use, and disclosure will occur. By entering data into HMIS, the CHO verifies that individuals have provided the CHO with informed consent to use and disclose their data for purposes described below and for other uses and disclosures the HMIS Lead Agency determines to be compatible:

- To provide or coordinate individual referrals, case management, housing, or other services. Client records may be shared with other organizations that may have separate privacy policies and that may allow different uses and disclosures of the information.
- For functions related to payment or reimbursement for services.
- To carry out administrative functions, including but not limited to audit, personnel oversight, and management functions.
- To produce aggregate-level reports regarding use of services.
- To produce aggregate-level reports for funders or grant applications.
- To create de-identified (anonymous) information.
- To track system-wide and project-level outcomes.

- To identify unfilled service needs and plan for the provision of new services.
- To conduct a study or research project approved by the CoC's.
- When required by law (to the extent that use or disclosure complies with and is limited to the requirements of the law).
- To avert a serious threat to health or safety if:
    - The use or disclosure is reasonably believed to be necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and
    - The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
- To report about an individual reasonably believed to be a victim of abuse, neglect, or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect, or domestic violence in any of the following three circumstances:
    - Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law.
    - If the individual agrees to the disclosure; or
    - To the extent that the disclosure is expressly authorized by statute or regulation and either of the following are applicable:
        - The CHO believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or
        - If the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the HMIS data for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely effected by waiting until the individual is able to agree to the disclosure;
    - When such a permitted disclosure about a victim of abuse, neglect, or domestic violence is made, the individual making the disclosure will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:
        - In the exercise of professional judgment, it is believed that informing the individual would place the individual at risk of serious harm; or
        - It would be informing a personal representative (such as a family member or friend), and it is reasonably believed that the personal representative is responsible for the abuse, neglect, or other injury, and that informing the personal representative would not be in the best interests of the individual as determined in the exercise of professional judgment.
    - Any requests for HMIS information from a law enforcement official must be in the form of a lawful court order, court-ordered warrant, subpoena, or summons issued by a judicial officer, or a grand jury and must be submitted to the HMIS Lead Agency for response.
    - To comply with government reporting obligations for HMIS and for oversight of compliance with HMIS requirements.
    - To third parties for the following purposes:
        - To permit other systems of care to conduct data matches (i.e., to determine if you are also utilizing services from such other systems of care); and
        - To permit third party research firms and/or evaluators to perform research and evaluation services, as approved by the CoC's, in connection with the projects administered by the HMIS. The third party that will receive such client-level HMIS data and use it as permitted above must first execute a Data Use Agreement. The Data Use Agreement requires the third party to comply with all applicable laws and regulations, including the privacy standards and disclosure provisions contained in the current HUD HMIS Data and Technical Standards.

Data Privacy & Security Policies

HMIS Lead Agency and the CHOs

The HMIS Lead Agency may share client level HMIS data with contracted entities as follows:

- The CHO originally entering or uploading the data into HMIS.
- Outside organizations under contract with the HMIS Lead Agency or other entities acting on behalf of the CoC's for research, data matching, and evaluation purposes. The results of this analysis will always be reported in aggregate form; client level data will not be publicly shared under any circumstance.

Entities providing funding to organizations or projects required to use HMIS will not have automatic access to HMIS. Access to HMIS will only be granted by the HMIS Lead Agency when there is a voluntary written agreement in place between the funding entity and the organization or project. In such cases, funder access to HMIS will be limited to data on the funded organization or project. Funding for any organization or project using HMIS cannot be contingent upon establishing a voluntary written agreement allowing the funder HMIS access.

Any requests for reports or information from an individual or group who has not been explicitly granted access to HMIS will be directed to the HMIS Oversight Committee. No individual client data will be provided to meet these requests without proper authorization.

Before any use or disclosure of Personal Identifying Information (PII) that is not described here is made, the HMIS Lead Agency or CHO wishing to make the disclosure will seek the consent of all individuals whose PII may be used or disclosed.

Access and Correction

Clients whose data is collected in HMIS may inspect and receive a copy of their HMIS record by requesting it from the CHO that originally collected the information. The HMIS Lead Agency requires the CHO to establish a policy to manage such requests and to explain any information a client may not understand.

Each CHO privacy policy will describe how requests from clients for correction of inaccurate or incomplete HMIS records are handled. The policy will allow clients to request their HMIS data or request the data be removed from the HMIS. Nothing in this section is intended to indicate that a CHO is released from any obligation by any funder to collect required data elements.

Clients have the right to correct or remove elements of their data in HMIS. Any such corrections applicable to the data stored in HMIS will be corrected within one week of the request date.

If a client requests to view his or her data in the HMIS, the CHO will keep a record of such requests and any access granted. The CHO will provide a copy of the requested data within a reasonable timeframe to the client.

CHOs are permitted to establish reasons for denying client requests for inspection of HMIS records. These reasons are limited to the following:

- If the information was compiled in reasonable anticipation of litigation or comparable proceedings.

- If the record contains information about another client or individual (other than a healthcare provider or homeless provider) and the denial is limited to the section of the record containing such information.
- If the information was obtained under a promise of confidentiality (other than a promise from a healthcare provider or homeless provider) and if the disclosure would reveal the source of the information.
- Disclosure of the information would be reasonably likely to endanger the life or physical safety of an individual.

If a CHO denies a request for access or correction, the CHO will explain the reason for the denial. The CHO will also maintain documentation of the request and the reason for the denial.

CHOs may reject repeated or harassing requests for access to or correction of an HMIS record.

Data Retrieval and Sharing

HMIS generates reports required by HUD, the CoC's, and other stakeholders at a level that does not identify individuals but can provide accurate statistical data such as numbers served and trend assessments. The HMIS Lead Agency and HMIS System Administration staff have access to retrieve all data within the HMIS. All users with this level of access are required to protect client confidentiality in all reporting.

CHOs may share PII with each other for the purposes of determining eligibility and coordinating client services once an agreed upon Release of Information is in place, as outlined in the Data Privacy and Seurity section of the HMIS Policies and Procedures. CHOs may also retrieve HMIS data entered to produce statistical reports including number of clients served and trend assessments for internal purposes, grant applications, and other required reports, within the parameters established by the HMIS Oversight Committee. CHO's can request training regarding the downloading of client data by submitting a HelpDesk Ticket. The HMIS System staff will coordinate this training with the agencies.

Data Quality Plan

A data quality plan is a community-level document that facilitates the ability of the CoC's to achieve statistically valid and reliable data. A data quality plan sets expectations for the CoC's, the HMIS Lead Agency, and end users for capturing data on persons accessing the community's homeless assistance system.

Developed by the HMIS Oversight Committee and formally adopted by the CoC's, the plan:

- Identifies the responsibilities of all parties within the CoC's with respect to data quality;

- Establishes specific data quality benchmarks for timeliness, completeness, accuracy, and consistency;

- Describes the procedures for implementing the plan and monitoring progress toward meeting data quality benchmarks; and

- Establishes a timeframe for monitoring data quality on a regular basis.

TIMELINESS

Entering data in a timely manner can reduce human error that occurs when too much time has elapsed between data collection, or service transaction, and data entry. The individual entering data may be relying on handwritten notes or their own recall of a case management session, a service transaction, or a program exit date; therefore, the sooner the data is entered, the better chance the data will be accurate. Timely data entry also ensures that the data is accessible when it is needed, either proactively (e.g., monitoring purposes, increasing awareness, meeting funded requirements), or reactively (e.g., responding to requests for information, responding to inaccurate information).

All data shall be entered into HMIS in a timely manner. The timeliness data entry standards are:

- **Emergency Shelters:** Universal Data Elements and Housing Check-In/Check-Out are entered within 3 workdays (72 work hours after the check-in/check-out time)

- **Transitional and Permanent Supportive Housing Programs:** Universal Data Elements, Program Specific Data Elements, and Housing Check-In/Check-Out are entered within 3 workdays (72 work hours after the intake)

- **Rapid Re-Housing and Homelessness Prevention Programs:** Universal and Program-Specific Data Elements are entered within 3 workdays (72 work hours after the enrollment/eligibility established)

- **Outreach Programs:** Data elements entered within 3 workdays of the first outreach encounter. Upon engagement for services, all remaining Universal Data Elements entered within 3 workdays

- **Supportive Services Only Programs:** Universal Data Elements are entered within 3 workdays

COMPLETENESS

Complete HMIS data helps a CoC meet various funding compliance requirements, and ensures that persons in the homeless assistance system receive the services needed to secure and maintain permanent housing. Additionally, it is necessary to fully understand the demographic characteristics and service use of persons accessing the homeless housing and services in the community. Complete data facilitates confident reporting and analysis of the nature and extent of homelessness, including:

- Unduplicated counts of persons served;

- Patterns of use of persons entering and exiting the homeless assistance system in the community; and

- Evaluation of the effectiveness of the community's homeless assistance system.

The CoC's goal is to collect 100% of all data elements. However, it's understood that this may not be possible in all cases. Therefore, the CoC's have established an acceptable range of missing/null, don't know, refused, and data not collected responses, depending on the data element and the type of program entering data.

See the Data Quality Scoring Rubric for more information.

Target
All data in the HMIS shall be collected and entered in a common and consistent manner across all programs. Data collection and entry should be conducted in accordance with current HUD HMIS Data Standards.

All Clients Served
HUD expects that all clients receiving housing and/or services through the homeless assistance system will have their service delivery documented in HMIS. If a program only enters data on a few of its clients, the program's efficacy cannot accurately be determined. Incomplete data may erroneously reflect low bed utilization rates (for housing programs), and may inaccurately reflect client's progress in meeting programmatic goals (i.e., employment, transitioning to permanent housing).

Target
All programs using the HMIS shall enter data for one hundred percent (100%) of clients served.

Bed Utilization
One of the primary features of the HMIS is its ability to record the number of client stays or bed nights at a homeless residential facility. A program's bed utilization rate is the number of beds occupied as a percentage of the entire bed inventory. When a client is enrolled into a residential program (emergency, transitional, or permanent), the client is assigned to a bed or unit. The client remains in that bed or unit until the client is transferred to another bed or unit, or is exited from the program. When the client is exited from the program, the client is also exited from the bed or unit in the HMIS.

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The CoC's recognizes that new projects may require time to reach the projected occupancy numbers and will not expect them to meet the utilization rate requirement during the first operating year.

Target

Project Type	Target Rate	Acceptable Rate
Emergency Shelter	90%	75%
Transitional Housing	100%	90%
Permanent Housing	100%	90%

Note: Please contact the HMIS System Administrator for updates to a project's Bed & Unit inventory by submitting a help desk ticket. For assistance on calculating Bed & Unit inventory, please use this resource.

ACCURACY

Accurate collection and entry of data into the HMIS ensures that the data is the best possible representation of reality as it relates to homeless persons and the programs that provide homeless housing and services. Data in the HMIS should accurately reflect client data recorded in the client's file, along with information known about the client and the housing and/or services received by the client.

Target

All data entered into the HMIS shall reflect information provided by the client and as documented in the client's file. Changes or updates in client information shall be reflected in the HMIS as they occur. To ensure the most up-to-date and complete data, data entry errors should be corrected at a minimum monthly, or more frequently as required.

CONSISTENCY

Consistency of data directly affects the accuracy of data. Consistency ensures that data is understood, collected, and entered in the same manner across all programs in the HMIS. Basic enrollment, annual assessment, and exit workflows/forms, designed to capture client data pursuant to HUD's HMIS Data Standards, provide for common and consistent data collection and are available to all programs.

Target

All data in the HMIS shall be collected and entered in a common and consistent manner across all programs. Data collection and entry should be conducted in accordance with the current HUD HMIS Data Standards.
See the Data Quality Scoring Rubric for more information.

MINIMUM DATA COLLECTION STANDARDS

All CHOs are responsible for asking all clients a minimum set of questions, or data elements. These required data elements include:

(1) The Universal Data Elements required federally by HUD; and

(2) Program-Specific Data elements, which depend on the funder and may not be required at all if a program is not funded by a program that requires the use of the HMIS.

CHO programs are configured by HMIS System Administration to collect the required data elements based on information provided by the CHO and its HMIS Contact. HMIS System Administration staff will consult with the HMIS Primary and Secondary Contact in attempts to ensure proper setup, but responsibility for complying with funder requirements lies with the CHO.

Agencies may collect additional information beyond the minimum required data elements, as long as the collection of these questions does not interfere with the minimum required data elements. The CHO's HMIS Contact can discuss options for customizing data collection via email at HMIS@kshomeless.com. Requests are subject to review by the HMIS Oversight Committee.

PROJECT SETUP, RENEWAL, & CLOSURE

A Project Setup, Renewal, and Closure Form (Project SRC Form) is required for new projects, renewals and project closings. This form gathers information such as project funding source, target population(s), and beds, which allows the HMIS System Administrator to configure data collection appropriately for the CHO in the database. This form can be accessed using this link: Project SRC Form

This form also includes a suggested training to assist in completing the form accurately. That training can also be found using this link: LMS Training Site

CHO's are required to complete a Project SRC Form 30 days before any project opening, closure, or renewal. All clients should be exited from the project prior to submitting a Project SRC Form. If a project closure is requested and clients are still enrolled in the project, the form will be denied and sent back to the requestor. CHO's will then have to resubmit the Project SRC Form once the necessary changes have been made.

The HMIS System Administration staff will assist in educating the CHO's on how to complete the form to best meet funder requirements. This assistance will be provided via the HelpDesk on completing the requirement.

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DOCUMENTATION REQUIREMENTS

Documentation Requirements includes files that are considered requirements for a project enrollment. CHO's are strongly encouraged to maintain any and all files in one secure place. Although each CHO has the discretion of choosing the secure place where they would like to house these documentation requirements for their eligible projects, it is strongly encouraged to house these documents within the HMIS System and enabled as Documentation Requirements. HMIS End users can then access a list of the required documents for enrollment when receiving referrals or completing program enrollments.

CHO's have the responsibility to communicate any program documentation requirements that do not violate the privacy of the client, to the HMIS team by submitting a ticket. This will allow the HMIS team to incorporate the documentation requirements into HMIS and the enrollment process. This process will promote honesty, accuracy, and consistency.

The HMIS System Administration staff will assist in educating the CHO's on how to enable these requirements in HMIS to best meet funder requirements. This assistance will be provided via the HelpDesk.

Required Documents can include but are not limited to:

Coordinated Entry Documentation   Proof of Income
Certification of Homelessness Form   Case Notes
Documentation of Homelessness   Housing Stability Plan
Documentation of Chronic Homelessness
Documentation of Disability
Documentation of Other Eligibility Criteria

OUTREACH MODULE

The Outreach Module of HMIS houses client location data with the ability to view, edit and interact with the location information. The Outreach Module is important for reviewing, analyzing, and reporting outreach activity, client geolocations, and encampments. The ultimate goal is to locate unsheltered clients with ease and provide the necessary services.

When HMIS end users identify households who are unsheltered, the end user connects the household by adding a physical location. Encampments can be added to identify a place where one or more individuals stay for a continuous time that includes temporary or permanent structures and personal belongings. This may include an outdoor location or other conditions meeting the definition of "place not meant for human habitation."

The street outreach map module can be utilized outside of housing program enrollments, while not the preferred method, it can be used for households that refuse entry into projects.

Client location information collected from the client can be entered into the Outreach Module within HMIS. HMIS End users can then access a history of recent locations per client when seeking to identify or locate a client in order to provide services.

 Information and guidance on how to utilize the Outreach Module can be found in the HMIS New User Training and/or the following Bitfocus Help Center Article.

DATA QUALITY SCORING RUBRIC

Note: Street Outreach data quality only applies to those marked as "engaged" in the system.

Completeness

All Universal Data Elements must be obtained from each adult and unaccompanied youth who applies for services through the system. Most Universal Data Elements are also required for children age 17 years and under.

Universal Data Element	Applies to	PH (RRH/PSH)		ES, SO, DS, SSO		HP, TH	
		OK% Missing	OK% Don't Know/Refused	OK% Missing	OK% Don't Know/Refused	OK% Missing	OK% Don't Know/Refused
Name	All Clients	1%	5%	3%	5%	3%	5%
Social Security #	All Clients	1%	9%	3%	9%	3%	9%
Date of Birth	All Clients	1%	5%	3%	5%	3%	5%
Race	All Clients	1%	5%	3%	5%	3%	5%
Ethnicity	All Clients	1%	5%	3%	5%	3%	5%
Gender	All Clients	1%	5%	3%	5%	3%	5%
Veteran Status	Adults Only (18+)	1%	5%	3%	5%	3%	5%
Disabling Condition	All Clients	1%	5%	3%	5%	3%	5%
Prior Living Situation	HoH and Adults	1%	5%	3%	5%	3%	5%
Destination	All Clients	1%	5%	3%	5%	3%	5%
Relationship to HOH	All Clients	1%	5%	3%	5%	3%	5%
Client Location	HoH Only	1%	5%	3%	5%	3%	5%
Housing Move-in Date	HoH Only	1%	5%	n/a	n/a	n/a	n/a
Chronic Homeless Series*	HoH and Adults	1%	5%	3%	5%	3%	5%
Referral from CES prior to entry	HoH Only	5%	n/a	n/a	n/a	5%	n/a

*Includes:

- Length of Stay in Prior Living Situation

- Approximate Date Homelessness Started

- Number of times on the streets, in ES, or Safe Haven in the past three years

- Total number of months homeless on the streets, in ES, or Safe Haven in the past three years

Consistency

It is critical that all aspects of a client's profile and assessment data "agree with" each other, and that there are no contradictions among the data. It is also critical that data within the system accurately reflects reality as provided by the client and as documented in the client's file.

Data Element	Applies to	PH (RRH/PSH) OK% Inconsistent data	ES, SO OK% Inconsistent data	TH, SSO, HP, DS OK% Inconsistent data
Date of Birth	All Clients	1%	3%	3%
Social Security #	All Clients	9%	9%	9%
Veteran Status	Adults Only (18+)	1%	3%	3%
Disabling Condition	All Clients	1%	3%	3%
Project Start/Exit Date	All Clients	1%	3%	3%
Relationship to HOH	All Clients	1%	3%	3%
Client Location	HoH Only	1%	3%	3%
Housing Move-in Date	HoH Only	5%	n/a	n/a
Income and Sources	HoH and Adults	1%	3%	3%
Domestic Violence series	HoH and Adults	1%	3%	3%
Veteran series	Adults Only (18+)	1%	3%	3%
Release of Information: Date of ROI consent	All Clients	1%	3%	3%

Date of Birth

- DOB is after Project Start Date
- Age is Negative or over 105

Social Security Number

- Incongruencies between SS # and Quality of SS #

Veteran Status

- Veteran status=yes and client is <18

Disabling Condition

- Incongruencies between Disabling Condition and Disabilities series

Project Start/Exit Date

- Overlapping project stays in same project

Relationship to HoH

- Multiple or no Head of Household

Client Location

- Incongruent with CoC coverage area

Housing Move-in Date

- Housing move-in date before project start date

Income and Sources, Domestic Violence series, and Veteran Status series

- Incongruencies between initial question and subassessment

Release of Information: Date of ROI consent

- Date of ROI consent missing from a record or expired consent with active enrollments

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MONITORING

The purpose of monitoring is to ensure that the agreed-upon data quality targets are met to the greatest extent possible, and that data quality issues are quickly identified and resolved. The CoC's recognizes that the data produced from the HMIS is critical to meet the reporting and compliance requirements of HUD, the individual agencies, and the CoC's as a whole. When data quality benchmarks are met, reporting will be more reliable and can be used to evaluate service delivery, program design and effectiveness, and efficiency of the system.

All HMIS participating agencies are expected to meet the data quality benchmarks described in this document. To achieve this, HMIS data will be monitored and reviewed in accordance with the schedule outlined in this section. All monitoring will be done by the HMIS Lead Agency, HMIS Oversight Committee, and HMIS staff with the full support of the CoC's.

Frequency

Data Timeliness: HMIS Contacts receive emails each month with reports on their agency's data timeliness. The HMIS Oversight committee will review these reports on a quarterly basis. Agencies with timeliness not up to standards will be asked to improve the rate before the next reporting period.

Data Completeness & Consistency: The HMIS Oversight Committee will review data quality reports and compare any missing rates to the data completeness benchmarks on a quarterly basis. Agencies with completeness not up to standards will be asked to improve the rate before the next reporting period.

Data Accuracy: Members of the HMIS Oversight Committee will review source documentation during annual site visits. The agency staff is responsible for making this documentation available upon request. Outreach programs may be exempt from the data accuracy review.

Compliance

Data Timeliness: The average timeliness rate should be within the allowed time frame.

Data Completeness & Consistency: Responses should not exceed the allowed percentages outlined in the Data Quality Scoring Rubric. Housing providers should stay within the allowed utilization rates.

Data Accuracy: The percentage of client files with inaccurate HMIS data should not exceed 5%. (For example, if the sampling includes 20 client files, then 19 out of 20 files must have the entire set of corresponding data entered correctly in HMIS.)

HMIS Reports

The following reports include data that is entered into HMIS and can directly effect CoC's and CHO funding based on the data quality within these reports. It is encouraged to run the following reports quarterly to maintain the CoC's expectations of data quality.

CHO's can run the following reports in between quarters to check for missing or incorrect data such as: missing assessments, duplicate clients, duplicate enrollments, missing or incorrect project start and end dates, missing or incorrect Universal Data Elements and destinations.

System Performance Measures (SPM)
The SPM focuses on the local response system, is ran by the CoC and System Administration team and is usually submitted at the end of May. The exact date can change by year. Please visit this page of the HUD Exchange for more information on this report
https://www.hudexchange.info/programs/coc/system-performance-measures/#guidance

Longitudinal System Analysis (LSA)
The LSA looks at the community as a whole and the local system in place that coordinates homeless assistance. The LSA can be analyzed to interpret how a community's response and homeless system as a whole is performing in terms of appropriately serving the homeless community. This report does not focus on specific programs and/or funding sources within a community, but rather if and how those experiencing homeless are using the system. Please visit this page of the HUD Exchange for more information on this report. https://www.hudexchange.info/homelessness-assistance/lsa/

LSA reports are submitted annually, ran by the CoC and System Administration team and the window for submission is around October but exact dates change annually.

Annual Performance Reports (APR)
APR's are ran by the CHO and due dates are dependent on the funding source. CoC funded programs are to submit an APR no later than 90 days after the period of performance end date. Please visit this page of the HUD Exchange for more information on this report.
https://www.hudexchange.info/programs/e-snaps/guides/apr/#guides-and-tools

Consolidated Annual Performance & Evaluation Report (CAPER)
The CAPER is submitted by ESG- Funded CHO's and is usually submission dates vary by funding source. The exact date can change by year. Please visit this page of the HUD Exchange for more information on this report. https://www.hudexchange.info/programs/sage/esg-caper/#guides-and-tools

Sheltered Point-in-Time (PIT)
The PIT is submitted by the CoC and System Administration team and is usually submitted at the end of April. The exact date can change by year. Please visit this page of the HUD Exchange for more information on this report. https://www.hudexchange.info/programs/hdx/pit-hic/

Housing Inventory Count (HIC)
The HIC is submitted by the CoC and System Administration team and is usually submitted at the end of April. The exact date can change by year. Please visit this page of the HUD Exchange for more information on this report.
https://www.hudexchange.info/programs/hdx/pit-hic/

Violation of HMIS Policies

HMIS users and CHOs must abide by all HMIS policies and procedures found within the HMIS Policies & Procedures, the User License Agreement, and the Agency Participation Agreement. Repercussion for any violation will be assessed in a tiered manner. Each user or CHO violation will face successive consequences – the violations do not need to be of the same type in order to be considered second or third violations. User violations do not expire. No regard is given to the duration of time that occurs between successive violations of the HMIS operation policies and procedures as it relates to corrective action. Any user or CHO violations may be appealed to the HMIS Oversight Committee.

First Violation

The user and CHO will be notified of the violation in writing by HMIS System Administration. The user's license will be suspended for 30 days, or until the CHO notifies HMIS System Administration of action taken to remedy the violation. HMIS System Administration will provide necessary training to the user and/or CHO to ensure the violation does not continue. HMIS System Administration will notify the HMIS Oversight Committee of the violation during the next scheduled committee meeting following the violation.

Second Violation

The user and CHO will be notified of the violation in writing by HMIS System Administration. The user's license will be suspended for 30 days. The user and/or CHO must take action to remedy the violation; however, this action will not shorten the length of the license suspension. If the violation has not been remedied by the end of the 30-day user license suspension, the suspension will continue until the CHO notifies the HMIS System Administration of the action taken to remedy the violation. HMIS System Administration will provide necessary training to the user and/or CHO to ensure the violation does not continue. HMIS System Administration will notify the HMIS Oversight Committee of the violation during the next scheduled committee meeting following the violation.

Third Violation

The user and CHO will be notified of the violation in writing by HMIS System Administration. HMIS System Administration will notify the HMIS Oversight Committee of the violation and convene a review panel made up of HMIS Oversight Committee members who will determine if the user's license should be terminated. The user's license will be suspended for a minimum of 30 days, or until the HMIS Oversight Committee review panel notifies HMIS System Administration of their determination, whichever occurs later. If the HMIS Oversight Committee determines the user should retain their user license, HMIS System Administration will provide necessary training to the user and/or CHO to ensure the violation does not continue. If users who retain their license after their third violation have an additional violation, that violation will be reviewed by the HMIS Oversight Committee review panel.

Notifying the HMIS Lead Agency of a Violation.

It is the responsibility of the HMIS Contact and user to notify the HMIS System Administration within 24 hours of when they suspect that a user or CHO has violated any HMIS operational agreement, policy, or procedure. A complaint about a potential violation must include the user and CHO name and a description of the violation, including the date or time frame of the suspected violation. Complaints should be sent in writing to the HMIS System Administration by submitting a ticket. The name of the person making the complaint will not be released from HMIS System Administration if the individual wishes to remain anonymous.

Violations of Local, State or Federal Law

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

Potential to Escalate

All violations will be assessed by HMIS System Administration and depending on their severity may be subject to the consequences listed under the Third Violation above as determined by the HMIS Lead Agency.

Multiple Violations within a 12-Month Timeframe

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

Participating Entities

Regardless of funding source, entities which may use HMIS include, but are not limited to:

- Coordinated Entry Assessors and Priority List
- Day Shelters & Drop-in Centers
- Emergency Shelters
- Transitional Housing programs
- Rapid Re-Housing programs

- Supportive Housing programs (scattered site or on-site)
- Street and Community Outreach programs
- Supportive Services programs
- Youth Homelessness Demonstration Program (YHDP)

HMIS participation is a requirement of various funders. At the federal level, HMIS participation is mandated for service and housing providers that receive funding through the following agencies and funding sources:

U.S. Department of Housing and Urban Development (HUD)

- Office of Special Needs Assistance Programs (SNAPS)
- Continuum of Care (CoC) Program
- Emergency Solutions Grants (ESG) Program
- Housing Opportunities for Persons with AIDS program (HOPWA)
- HUD-Veterans Affairs Supportive Housing (HUD/VASH)
- Rural Housing Stability Assistance Program (RHSP)

U.S. Department of Health and Human Services (HHS)

- Administration for Children & Families (ACF) & Family and Youth Service Bureau (FYSB)
- Runaway and Homeless Youth (RHY)
- Substance Abuse & Mental Health Services Administration (SAMHSA)
- Projects for Assistance in Transition from Homelessness (PATH)

U.S. Department of Veteran Affairs (VA)
- Supportive Services for Veteran Families Program (SSVF)
- Community Contract Emergency Housing (HCHV/EH)
- VA Community Contract Safe Haven Program (HCHV/SH)
- Grant and Per Diem Program (GPD)

Note: Any HMIS questions that exist regarding conflicting statutory regulations should be presented to the HMIS Oversight Committee for clarification, planning, and implementation.