

2023 HMIS POLICIES & PROCEDURES

Kansas Balance of State
Continuum of Care



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Introduction

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 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.

HMIS is a collaborative project of the Kansas Balance of State Continuum of Care (BoS CoC), which includes the Kansas Housing Resources Corporation (KHRC) as the HMIS Lead Agency, Kansas Statewide Homeless Coalition (KSHC) as the CoC Collaborative Applicant and HMIS System Administrator, and participating Covered Homeless Organizations (CHOs).

All operational agreements, policies, procedures, and protocols are reviewed annually by the HMIS Oversight Committee and the CoC Steering Committee to comply with HMIS Standards or otherwise improve the HMIS implementation.

Contact Information

Kansas Balance of State CoC HMIS website: www.kshomeless.com/hmis

HMIS Help Desk: www.kshomeless.com/hmis-help-desk

HMIS Email hmis@kshomeless.com

HMIS Lead Agency

Kansas Housing Resources Corporation

www.kshousingcorp.org

611 S Kansas Ave Suite 300, Topeka, KS 66603



HMIS System Administrator

Kansas Statewide Homeless Coalition

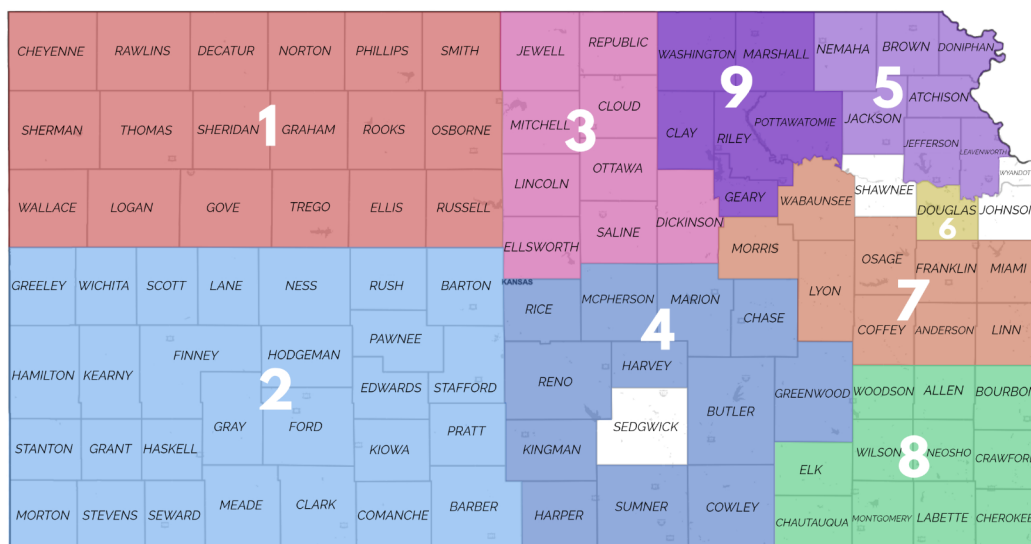
www.kshomeless.com

2001 Haskell Ave., Lawrence, KS 66046



Kansas Balance of State

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.



HMIS Software

The CoC selected Clarity Human Services (“Clarity”), a web-based HMIS software owned by Bitfocus, Inc. (“Bitfocus”), to be the HMIS software of record. It empowers human service providers, agencies, coalitions, and communities to manage real-time client and services data. The CoC directly contracts with Bitfocus for this software and supports the HMIS System Administration team at the Kansas Statewide Homeless Coalition (KSHC) with help desk, ongoing training, and project customization. The KSHC works directly with CHOs to identify needs and requirements for custom reports developed by the KSHC or canned reports made available by Bitfocus.



Bitfocus



CLARITY
HUMAN SERVICES

Comparable Database for Victim Service Providers (VSPs)

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 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](#).

Osnum is the current selected comparable database for Victim Service Providers.

OSNIUM
SOFTWARE INC.

Participating Entities

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

- Coordinated Entry Assessors and Priority List Managers
- 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)

VA | U.S. Department
of Veterans Affairs

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

Federal HMIS Policies

In addition to the HMIS Policies contained herein, the Kansas Balance of State HMIS must also comply with federal HMIS requirements. These requirements are detailed within the HMIS Data Standard resources provided below:

Manual Name	Intended Audience	Contents
HMIS Data Dictionary	HMIS Vendors & HMIS Lead Agencies	The 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 Standards Manual	HMIS Lead Agencies & HMIS Users	The 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 User will find as a reference.
HMIS Standard Reporting Terminology Glossary	HMIS Vendors & HMIS Lead Agencies	The Standard Reporting Terminology Glossary is designed to provide HMIS systems, and their programmers, a foundation upon which they can best program HMIS-required reports.

These documents are typically reviewed and updated biannually, with changes effective October 1st, in line with the federal fiscal year.

HMIS Federal Partner Program Manuals 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 a HUD Continuum of Care program HMIS grant, as well as other funding from the CoC and participating CHOs. In the event of a funding shortage, it is the responsibility of the HMIS Lead Agency and the KS BoS CoC Steering Committee to explore options to increase revenue. If facing a significant financial shortfall, CHOs will be required to pay user fees for the HMIS software and reporting licenses assigned to their agency/users.

Roles & Responsibilities

Continuum of Care

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 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 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 Steering Committee

The CoC Steering Committee has several HMIS responsibilities outlined in the CoC Governance Charter:

- 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 Agency manages and administers all HMIS operations and activities on behalf of the CoC. Kansas Housing Resource Corporation (KHRC) currently serves as the HMIS Lead Agency for the Kansas Balance of State Continuum of Care.

The responsibilities of the HMIS Lead Agency include:

A. General

- Obtain and maintain the contract with the CoC selected HMIS vendor.
- Notify and solicit feedback from the CoC 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 selected HMIS vendor.
 - Participate as a voting or non-voting member of the CoC.
 - 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 law.
 - Apply as the project applicant for all HUD CoC Program HMIS Projects within the CoC.
 - 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 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 local additional requirements.
- Develop and implement a data quality plan in conjunction with the HMIS Oversight Committee.

D. Reporting

- Work with the HMIS Oversight Committee and KSHC 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.

Collaborative Applicant

The Kansas Statewide Homeless Coalition (KSHC) currently serves as the Collaborative Applicant for the Kansas Balance of State Continuum of Care. The Collaborative Applicant has several HMIS responsibilities outlined in the CoC Governance Charter:

- Work with HMIS Lead Agency to prepare reports on performance targets and report back to the CoC Steering Committee.
- Work with HMIS Lead to ensure HMIS Policies and Procedures and Data Quality plans are in place.
- As part of the monitoring process, evaluate CoC program funded projects' participation in HMIS.
- Work with HMIS Lead and HMIS Committees to complete and submit Point-in-Time (PIT) count and Housing Inventory Count (HIC).
- Complete gaps analysis with HMIS Lead and Performance & Compliance Committee, and submit to HUD.

System Administration

KSHC contracts with the Kansas Housing Resources Corporation (KHRC) to provide HMIS System Administration and HMIS staff. Responsibilities include:

- Manage end user licenses, including authorizing usage and the level of access to HMIS for all users.
- Obtain signed Agency Agreements and End User Agreements for agencies/users.
- Add and remove CHO administrators.
- Customize the HMIS application to meet local data requirements (within reason and within constraints of budget and other duties).
- Facilitate all training and user guidance needed to ensure appropriate system use, accurate and timely data entry, data reporting, data security, and confidentiality.
- Work with the HMIS Oversight Committee to establish training requirements for users.
- Maintain documentation of user training completion.
- Outreach to CHOs to facilitate end user support.
- Develop and maintain resources to provide data entry guidance for users.
- Ensure maintenance of an email help desk for user support.
- Communicate at least monthly with the CoC through the regularly scheduled monthly meeting to provide information on upcoming regulatory changes, software upgrades, current HMIS news, trainings, etc.
- Monitor data quality and generate data quality reports under the HMIS Data Quality Plan.
- Assist CHOs and users to rectify data quality concerns.
- Assist CHOs with agency-specific data collection and reporting needs, such as the Annual Progress Report and other program reports (within reason and within constraints of budget and other duties).

- Develop workflow requirements for data entry and reporting to meet CHO reporting requirements.
- Construct, run, and publish all necessary system-wide reports to meet federal and local reporting compliance, including the Longitudinal Systems Analysis report, Systems Performance Measures report, Point-in-Time count, and Housing Inventory Count.
- Provide aggregate reports to groups or stakeholders requesting HMIS information within the constraints detailed in the Data Privacy & Security section below.

Covered Homeless Organizations

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.
- Send any changes to user or program status to **hmis@kshomeless.com** in a timely manner.
- Explain ROI, post HMIS Data Collection Notice, and provide Privacy Notice to clients upon request.

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 to **hmis@kshomeless.com** 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.

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 codebook 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 Oversight Committee

A. Composition

The HMIS Oversight Committee shall consist of:

- HMIS Oversight Committee 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.)
- HMIS Lead Agency Representative(s) (Kansas Housing Resource Corporation staff)
- HMIS System Administrator (Kansas Statewide Homeless Coalition staff)
- ESG Program Director or Designee (Kansas Housing Resource Corporation staff)
- CoC Program Director or Designee (Kansas Statewide Homeless Coalition staff)
- PATH Program Director or Designee (Kansas Department for Aging & Disability Services (KDADS) staff)
- VA Program Director or Designee (Robert J. Dole VA Medical Center staff)
- Coordinated Entry Program Manager or Designee (Kansas Statewide Homeless Coalition staff)
- Victim Service Providers Designee (Kansas Coalition Against Sexual & Domestic Violence staff)

i. The HMIS Oversight Committee Chair will be elected by the CoC 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 Chairperson for that calendar year.

ii. Nominations for the position will occur during the last regularly scheduled monthly call at the end of the calendar year in December during the HMIS update portion of the agenda. 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.

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.

Per the CoC Governance charter, the HMIS Oversight Committee will:

- Recommend the HMIS Lead and HMIS Software.
- Monitor the HMIS Lead Agency on an annual basis.
- Develop and recommend HMIS Policies and Procedures to the CoC Steering Committee.
- Provide support to agencies to ensure HMIS participation.
- Work with HMIS Lead and Collaborative Applicant to complete PIT count.
- Review gaps analysis and recommend changes (along with Performance & Compliance Committee).

C. HMIS Compliance

Any concerns/issues presented to the HMIS Oversight Committee by any subcommittee or the CoC 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 the Performance & Compliance Committee and at the monthly statewide CoC 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.

HMIS End User Committee

A. Composition

The membership shall consist of all end users throughout the CoC.

B. Responsibilities

This committee 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.

C. Meetings

The HMIS End User Committee meets on a quarterly basis.

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 CHOs Monitoring	✓	✓	✓	
HMIS Software Vendor Management	✓	✓	✓	
Privacy	✓	✓	✓	✓
Security	✓	✓	✓	✓
System Administration		✓		
Technical Support		✓		
Training		✓		
Reporting	✓	✓	✓	✓
Data Analysis	✓	✓	✓	✓
Data Quality	✓	✓	✓	✓
Data Integration	✓	✓	✓	

HMIS Access

The following steps must be taken to gain access to the Kansas Balance of State's HMIS.

Note: Access and support for the comparable database used by VSPs 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.

Agency Participation Agreement

The Executive Director of the CHO must sign an HMIS Agency Participation Agreement before access is granted to HMIS. Signing of the HMIS Agency 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. The agreement is then resubmitted on an annual basis at the start of the fiscal year in October.

Project Setup

A Project Inventory Form is required for new projects. The form, which gathers information such as project funding source, target population(s), and beds, allows the HMIS System Administrator to configure data collection appropriately for the CHO in the database.

New Users

Before receiving access to HMIS, new users must complete the following steps:

User License Agreement

New users must complete a User License 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, including:

- Kansas Clarity Human Services General Training
- Kansas Balance of State CoC HMIS Annual Refresher
- HMIS Data Matters Training

Coordinated Entry Training

Coordinated Entry (CE) is a process for people experiencing, or at risk of homelessness, to access homeless assistance. CE includes how people access services, how they are prioritized, and how referrals to housing and services are provided. The goal of CE is to increase the efficiency of local crisis response systems and improve fairness and ease of access to resources, including mainstream resources. The Coordinated Entry process for the CoC is embedded within the HMIS system and is managed by KSHC.

The CoC maintains a HUD-funded Supportive Services Only (SSO)-CE project which requires the collection of Coordinated Entry data elements in HMIS. Additionally, the CoC is required to produce a CE-specific Annual Performance Report (CE APR).

Most project types (excluding Emergency Shelter, Street Outreach, and VSP projects) require going through the Coordinated Entry process prior to program enrollment. Users at agencies who have projects that require CE involvement must complete Coordinated Entry training.

HMIS Technical Support

The HMIS Lead Agency, Kansas Housing Resources Corporation, contracts with the Kansas Statewide Homeless Coalition to provide HMIS System Administration support.

Clarity Human Services Help Center Website

Bitfocus, the developer of Clarity Human Services, offers a help center at help.bitfocus.com.

Kansas Statewide Homeless Coalition Website

The Kansas Statewide Homeless Coalition website hosts HMIS resources, forms, policies, and training videos. Visit www.kshomeless.com/hmis for more information.

HMIS Help Desk

For technical assistance within the Clarity Human Services system, the HMIS Help Desk is available at www.kshomeless.com/hmis-help-desk. 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 Email

For general, non-technical HMIS questions, contact HMIS@kshomeless.com.

Program Related Requests

After initial project setup, requests related to making changes to a project's configuration should come from the designated HMIS Contact and should be directed to HMIS@kshomeless.com.

Zoom

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. Email HMIS@kshomeless.com for scheduling.

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 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 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 Personally Identifying Information (PII) 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, non-PII information will be entered into HMIS. 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. 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 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.

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. The CoC, 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 and HMIS Oversight Committees will work collaboratively for all required HUD reporting. Any other data requests must be submitted through www.kshomeless.com/hmis-data-request. All requests will be considered by the HMIS Oversight Committee. Fees may be applicable depending on request.

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 make the HMIS Grievance Form available to clients upon request. This form can be found at kshomeless.com/hmis-grievance.

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.

Security Review

HMIS staff will complete an annual security review to ensure the implementation of the security requirements for itself and Participating Agencies. The security review will include the completion of the HMIS Security Certification Checklist by each participating CHO ensuring that each security standard is implemented. The KS BoS CoC board has selected the HMIS Oversight Committee to serve as security officers.

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. 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.
- 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:
 - i. The CHO believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or
 - ii. 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:
 - i. In the exercise of professional judgment, it is believed that informing the individual would place the individual at risk of serious harm; or
 - ii. 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, 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**.

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 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, 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 Policies and Procedures 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.

Data Quality Plan

A data quality plan is a community-level document that facilitates the ability of the CoC to achieve statistically valid and reliable data. A data quality plan sets expectations for the CoC, 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, the plan:

- Identifies the responsibilities of all parties within the CoC 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 has 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** on page 24 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.

The CoC 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

	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. For assistance on calculating Bed & Unit inventory, please see 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** on page 25 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 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.

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)	ES, SO	TH, SSO, HP, DS
		OK% Inconsistent data	OK% Inconsistent data	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

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 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 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.

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.)

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 at hmis@kshomeless.com. 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.

FY '22 HMIS CALENDAR

2022

October

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

November

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

December

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

2023

January

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

February

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28				

March

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
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12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

April

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
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23	24	25	26	27	28	29
30						

May

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

June

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

July

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

August

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

September

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30



DQ Check



HMIS
End User
Committee



LSA

12/5 HDX opens
12/19 Draft due
2/15 Final deadline



PIT/
HIC 1/25 Day of count
5/5 HDX deadline



SPM

10/1 HDX opens
2/28 Final deadline