

# Will County Continuum of Care

## HMIS Data Quality Plan



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## Introduction

Data is important. Good Data helps a community understand its performance and determine if the right combination of strategies and resources have been deployed. This document describes the Homeless Management Information System (HMIS) data quality plan for Will County Continuum of Care (CoC). The document includes data quality plan and protocols for ongoing data quality monitoring that meets requirements set forth by the Department of Housing and Urban Development (HUD) This HMIS Data Quality Plan is to be updated annually, considering the latest HMIS data standards and locally developed performance plans.

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 is generally developed by the HMIS Lead Agency with input from community stakeholders and is formally adopted by the CoC. In short, a data quality plan sets expectations for both the community and the end users to capture reliable and valid data on persons accessing the homeless assistance system.

The plan:

- Identifies the responsibilities of all parties within the CoC with respect to data quality
- Establishes specific data quality benchmarks for completeness (coverage and utilization), accuracy, timeliness, and consistency
- Describes the procedures for implementing the plan and monitoring progress toward meeting data quality benchmarks
- Establishes a timeframe for monitoring data quality on a regular basis
- Documents the Privacy and Security plans as required by the CoC interim Rule

Each Partner invested in ending homelessness plays a key role in improving the quality of data used to measure the success and challenge of that effort:

- CoC Leadership can make the connection between data quality efforts and accuracy of System Performance Measures, other local data analysis, and the ability to support CE system, as well as establish community-wide expectations about providing high quality data.
- HMIS Lead/System Administrator can make data quality reports readily available to Participating Agencies and CoC leadership and conduct trainings on a regular basis that include expectations.
- HMIS Vendors can be responsive to the evolving data quality needs of communities, ensure CoC leadership and HMIS Leads/System Administrators have access to tools that identify and troubleshoot data quality issues.
- Participating Agencies can set the tone for the agencies' commitment to data quality by developing incentives and expectations for individual staff that collect and enter data into HMIS. Make HMIS data quality an element of a staff person's annual performance review and a factor in determining advancements.
- Other funders can also set the tone and expectations for high data quality by making funding and resource decisions based on the quality of data submitted in applications and mandatory reports.

# Data Quality

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. With good data quality, the CoC can “tell the story” of the population experiencing homelessness. The quality of data is determined by assessing certain characteristics such as timeliness, completeness, and accuracy. In order to assess data quality, a community must first think about what data quality means and document this understanding in a data quality plan.

## Important Elements of Data Quality and Community Benchmarks

**Completeness:** *The degree to which all required data is known and documented. Coverage and utilization are both forms of 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 on the nature and extent of homelessness, including:

- Unduplicated counts of person(s) served
- Patterns of use of person(s) entering and exiting the homeless assistance system within the CoC
- Evaluation of the effectiveness of the community’s homeless assistance system within the CoC

### *“Universal & Program Specific” Data Elements*

It is the combined effort of all of the Agencies within the CoC as well as the CoC goal is to collect 100% of all data elements. However, the CoC recognizes that this may not be possible in all cases. CoC expects all assessments to be asked of those and take precautionary steps not to duplicate information; it is also the responsibility of the users to review assessment information to ensure accuracy of the point in time when working with the person or family to ensure accuracy of information of the person(s) of that day. All data in the HMIS shall be collected and entered in a common and consistent manner across all programs. Intake personnel should take the time to review and update all assessment questions of each of the individual(s).

## Community Benchmark

### ***PH (PSH or RRH), TH, ES, and Supportive Services***

- 100% of the Universal Data Elements with the following exceptions noted below
- 0% of Null or Missing information
- Less than 5% of “Client Does Not Know or Refused” will be accepted for only the follow data elements
  - Social Security
  - Residence Prior to Project Entry
  - Destination
  - Exception of Less than 10% for Emergency Shelters
  - Disability Condition

### ***Outreach***

- 100% of the Universal Data Elements with the following exceptions noted below
- 0% of Null or Missing information

- Less than 10% of “Client Does Not Know or Refused” will be accepted for only the follow data:
  - Name
  - Gender
- Less than 25% for elements of:
  - Date of Birth
  - Race
  - Ethnicity
  - Veteran Status
  - Disability Condition
- Less than 50% for the elements of:
  - Social Security Number

Tools available to monitor this Benchmark:

- ART 0252 Data Completeness Report Card
- ART 0640 HUD Data Quality Report Framework
- CoC-APR canned report

**Coverage:** The degree to which all homeless assistance providers within a CoC’s geography enter all homeless clients into HMIS. Providers include those funded by the CoC and ESG Program, federal partner agencies, foundations, and private organizations.

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).

**Community Benchmark**

The goal is to collect 100% of the information of each person(s) being served during the reporting period.

- 100% of the Program Data Elements with the following exceptions noted below:
  - 0% of Null or Missing information
  - Less than 5% of “Client Does Not Know or Refused”

Tools available to monitor this Benchmark:

- ART 0252 Data Completeness Report Card
- ART 0640 HUD Data Quality Report Framework
- CoC-APR canned report

**Utilization:** The degree to which the total number of homeless beds within the HMIS are recorded as occupied divided by the total number of homeless beds within the CoC’s geographic coverage area.

Bed utilization is directly based on the bed inventory recorded during the HUD’s annual Housing Inventory and Point in Time count held on last Wednesday of January. It is each Agency’s responsibility to account for the inventory of beds in use, beds planned to be made in use during the reporting year and define beds which are funded but not expected to be placed into use of that year. This information is a necessary component for HUD’s

annual reporting of the CoC’s “AHAR” Annual Homeless Assessment Report to Congress as well HUD’s of the CoC’s “APR” Annual Performance Report.

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), they is assigned to a bed or unit. The client remains in that bed or unit until they is transferred to another bed or unit, or is exited from the program. When the client is exited from the program, the person(s) are also exited from the bed or unit in the HMIS.

HUD has three categories which beds are classified:

- Current (Beds currently is use)
- New (Will be enter into service in current year )
- Under development (Funded beds but not available)

The CoC has a forth category – Unplanned changes: Beds which are unaccountable during the official HIC process in January.

These beds will require additional “*Bed Inventory Records*” in each program (per HUD standards) in HMIS including written explanation of the “Unplanned” changes to the CoC for accountability for official HUD reporting with notation of the additional Bed Inventory Record changes for review and approval by the CoC.

*Note: 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.*

**Community Benchmark**

Agency Administrators must submit a quarterly Housing Inventory Count to the HMIS Administrator for review.

Housing Program Type	Target Utilization Rate (%)	Acceptable Utilization Rate (%)
Emergency Shelter	75%	65%
Transitional Housing	90%	65%
Permanent Housing	90%	85%

Tools available to monitor this Benchmark:

- AHAR Report
- 0629 Housing Inventory Count

**Timeliness:** The degree to which the data is collected and available when it is needed.

Entering data in a timely manner can reduce human error that occurs when too much time has elapsed between the data collection, or service transaction, and the data entry. Timely data entry ensures 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).

Timeless by the CoC definition is based on elapse time to which the record of information was actually added compared to the date of the Entry or Exit inputted by the Provider.

### **Community Benchmark**

The CoC considers acceptable length of time between time added and Date noted in the Entry or Exit record:

- ES, TH, PH – Nothing greater than three (3) days from intake
- Outreach – Nothing greater than six (6) days from intake
  - Upon engagement for services, all remaining Universal Data Elements entered within three (3) workdays
- Supportive Services Only Programs: Universal Data Elements are entered within three (3) workdays

Tools available to monitor this Benchmark:

- ART 0361 Expedience of Entry, Service and Referral
- COC-APR reporting

**Accuracy:** The degree to which data reflects the real-world client or service.

**Consistency:** The degree to which the data is equivalent in the way it is collected and stored.

Information entered into the HMIS needs to be valid, i.e. it needs to accurately represent information on the people that enter any of the homeless service projects contributing data to the HMIS. Inaccurate data may be intentional or unintentional. In general, false or inaccurate information is worse than incomplete information, since with the latter, it is at least possible to acknowledge the gap. Thus, it should be emphasized to clients and staff that it is better to enter nothing (or preferably “don’t know” or “refused”) than to enter inaccurate information. To ensure the most up-to-date and complete data, data entry errors should be corrected regularly and through each monthly

All data entered into the HMIS should be a reflection of information provided by the client, as documented by the intake worker or otherwise updated by the client and documented for reference.

Data consistency will ensure that data is understood, collected, and entered consistently across all projects in the HMIS. Consistency directly affects the accuracy of data; if an end user collects all of the data, but they don’t collect it in a consistent manner, then the data may not be accurate. All data in HMIS should be collected and entered in a common and consistent manner across all projects. To that end, all intake and data entry workers will complete an initial training before accessing the live HMIS system.

### **Community Benchmarks**

- The percentage of client files with inaccurate HMIS data should not exceed 10%. (For example, if the sampling includes 10 client files, then 9 out of 10 of these files must have the entire set of corresponding data entered correctly in HMIS.)
- Intake information must reflect the person’s living situation the night prior to the intake. Old information is considered an error. The element should have less than a 5% error rate.

Tools available to monitor this Benchmark

- ART 0361 Expedience of Entry, Service and Referral
- ART 0252 Data Completeness Report Card
- COC-APR reporting

## **Data Monitoring Plan**

A data quality monitoring plan is a set of procedures that outlines a regular, on-going process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the program and aggregate system levels. A data quality monitoring plan is the primary tool for tracking and generating information necessary to identify areas for data quality improvement.

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 conducted by the HMIS Lead Agency with the full support of the Will County Continuum of Care aka "CoC".

### **Roles and Responsibilities**

- **Data Completeness:** The CoC will measure completeness by running APRs, Universal Data Quality, or custom reports, and compare any missing rates to the data completeness benchmarks. The agency will be required to improve their data completeness rate or provide explanation before the next month's report.
- **Data Accuracy:** The CoC will review source documentation during the annual site visits. The agency staff is responsible to make this documentation available upon request. Outreach programs may be exempt from the data accuracy review.
- **Data Timeliness:** The CoC will measure timeliness by running custom reports in HMIS supplied reporting tools. Programs of different types will be reviewed separately. Individual Providers/Programs aka "agency" will be required to improve their data timeliness or provide explanation before the next month's report.

### **Monitoring Frequency**

- **Monthly Review:** Data Timeliness and Data Completeness
- **Quarterly Review:** Bed Utilization and Data Quality of UDE and PDE elements
- **Annual Review:** Site visits and Data Accuracy
- **Other:** Data quality monitoring may be performed outside of the regularly scheduled reviews, if requested by program funders or other interested parties (the agency itself, CoC, HUD, or other Federal and local government agencies)

### **Compliance**

- **Data Timeliness:** The average timeliness rate in any given month should be within the allowed timeframe.
- **Data Completeness:** There should be no missing (null) data for required data elements. Responses that fall under unknown (don't know or refused) should not exceed the allowed percentages in any given month. Housing providers should stay within the allowed utilization rates.
- **Data Accuracy:** The percentage of client files with inaccurate HMIS data should not exceed 10%. (For example, if the sampling includes 10 client files, then 9 out of 10 of these files must have the entire set of corresponding data entered correctly in HMIS.)

### **Data Quality Reporting and Outcomes**

Each month agencies are required to submit the Universal Data Quality report for all participating HMIS programs. Additionally, agencies are required to submit a quarterly Data Quality Certification for all participating HMIS programs. The certification will include any findings and recommended corrective actions. Each agency has

fifteen (15) days to make corrections, or if there are repeated or egregious data quality errors. The CoC may community partners about non-compliance with the required HMIS participation. The CoC may choose at any point to pull Quality base information to verify assurances the provider or program is taking all necessary actions to provide accurate and complete information.

### ***Data Management Expectations***

Timely HMIS data entry ensures that the data is accessible when it is needed, whether for monitoring purposes, meeting funding requirements, responding to requests for information, or for other purposes. Complete HMIS data 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 on the nature and extent of homelessness throughout the CoC. Complete HMIS data helps the 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. 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. 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.

All HMIS participating agency administrators must ensure that these minimum data entry standards are fulfilled for every program utilizing the HMIS.

To ensure that HMIS participating agencies meet the minimum data entry standards set forth herein, a copy of this Data Quality Plan will be posted to the HMIS Lead's website. Sample intake, annual update and discharge forms will also be posted to the HMIS Lead's website. Participating agencies will provide data quality reports to the HMIS Lead Agency in accordance with the monitoring schedule described in the "Monitoring" section to facilitate compliance with the minimum data entry standards.

Agencies that meet the data quality benchmarks will be periodically recognized by the CoC. HMIS participating agencies that do not adhere to the minimum data entry standards set forth herein will be notified of their deficiencies and provided with specific information regarding the nature of the deficiencies and methods by which to correct them. HMIS participating agencies will be given fifteen days to correct any identified data quality issues. Training will be offered to agencies that remain noncompliant with the minimum data entry standards. HMIS users whom continually demonstrate poor performance may have their access denied until recertified training has been provided. HMIS participating agencies continuing in default may have HMIS access suspended until such time as agencies demonstrate that compliance with minimum data entry standards can be reached.

## **Implementation Policies and Procedures**

An HMIS is a locally administered, electronic data collection system that stores longitudinal person-level information about the men, women, and children who access homeless and other human services in a community. Each CoC receiving HUD funding is required to implement an HMIS to capture standardized data about all persons accessing the homeless assistance system. Furthermore, elements of HUD's annual CoC funding competition are directly related to a CoC's progress in implementing its HMIS. In 2004, HUD published

HMIS Data and Technical Standards in the Federal Register. The Standards defined the requirements for data collection, privacy safeguards, and security controls for all local HMIS. In March 2010, HUD published changes in the HMIS Data Standards Revised Notice incorporating additional data collection requirements for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) funded under the American Recovery and Reinvestment Act (ARRA). Additional Data Standards are currently under revision to incorporate new privacy and technology industry standards. This section outlines the Will County Continuum of Care’s HMIS Standard Operation Polies and Procedures.

**Roles and Responsibilities**

**HMIS System Administrator:** This role is housed in the CoC Lead Agency. They are responsible for working with the HMIS vendor to ensure access to data quality report, understanding the data quality elements to be submitted with the SPM and APR, systematically monitoring the data and communicating regularly with the CoC and individual providers to ensure stakeholders are informed and have the resources to address data quality concerns. They also provide technical support and training regarding HMIS. Other responsibilities are outlined in the CoC Governance Charter.

**HMIS Technical Support Protocol**

The HMIS System Administrator will provide a reasonable level of support to Participating Agencies via email, or phone. HMIS Users should seek technical support from their Agency administrator expert. If more expertise is required to further troubleshoot the issue, Agency administrator expert should submit request to: [hmis@WCCCC.NET](mailto:hmis@WCCCC.NET). Technical Support Hours are Monday through Friday (excluding holidays) from 8:00 AM to 3:45 PM.

The HMIS Administrator will try to respond to all email inquiries and issues within three (3) business days, but support load, holidays, and other events may affect response time.

**Training**

Each end user must complete the required New User Training prior to gaining access to HMIS. Agency Admin staff will provide initial training to agency’s end users prior to assigned an User ID. The CoC offers certification trainings four times a year. The CoC requires all users to attend a CoC certification training to ensure consistency and accuracy in data collection. A new end user should attend the next scheduled CoC certification training once completing the initial agency training. All users must complete annual certification to maintain access to HMIS.

The table below lists the training courses offered:

<b>Course Description</b>	<b>Course Detail</b>
New User Training Certification HMIS 101	Users will learn the basic skills and concepts needed in order to complete the client intake process. HMIS 101 offered Quarterly at the CoC.
Recertification Training HMIS 102	Help to refresh the skills of active users, as well as review any issues users may have with navigating through the system or the data collection process. Also necessary to renew yearly User’s Policy. Classes offered annually at the CoC.
Advance Training	Users are given an overview of the various reporting and HMIS functionality options made available by the application vendor

### **Recertification**

All users must complete an annual certification to maintain access to HMIS. This recertification will consist of sets of questions in the areas of data intake, accuracy, data quality, and utilization of services and other elements of HMIS. The inability to successfully complete the test will require the user to attend CoC certification training. User may retest after the CoC training.

### **Suspension of User Access**

If users are not certified to use HMIS or they have not met the community benchmarks for data quality, their HMIS access may be suspended. Access will be restricted until the user can meet these benchmarks. User's which fall into this category will be mandated to attend CoC training for reinstatement. The CoC will actively monitor the person's data quality process for an undisclosed length of time. At such a point the CoC will review and inform the Agency of their results.

**End Users:** Employees of Participating Agency who enter data into HMIS. Each End user is required to complete the End User Agreement annually. The original copy sent to the CoC lead agency for filing.

### **Community Benchmarks for End Users:**

Input Data Consistent with the Requirements of set forth by HUD standards.  
Error rate last than 2% of all data elements.

Tools available to monitor this benchmark:  
0252 Data Completeness Report Card

### **HMIS User Code of Ethics**

HMIS data base access is sole purpose to allow CoC and all participating agencies and programs to properly and effectively gather information of those in need to help reduce and eliminate homeless.

Any other form of use of this information is a direct violation id User Ethics. Such actions include not limited:

- Sharing any HMIS information outside of the agency/program
- Any deliberate action which adversely effects any individual
- Person attempting to gain access to any agency computer and HMIS password which is not assigned to them
- Any Person accessing any computer asset and or using another HMIS ID for any reason
- Discovery of this breach of ethics will result in written notice from the CoC to the provider and disabling of the person(s) HMIS ID access.

**Agency Administrator:** Each Agency is required to have the minimum of one Agency Administrator. The Agency will identify their Agency Admin. Agency Admins must be approved and trained by the HMIS System Administrator. Agency Administrators may not define other Users as Agency Administrators.

Each Agency Admin is directly responsible for updating each program HMIS configuration with the necessary information to retain accuracy for HUD report. Such information includes but not limited:

- Bed Inventory
- Display settings
- Federal Grant sources
- Profile settings
- Services Updates

- Each Local Admin is directly responsible daily administrative duties such as:
- Initial New User Training
- Managing and maintaining User ID's
- Completion of the User Agreement
- Scheduling new users for CoC training/certification
- Monthly Administrative Meeting attendance at the CoC
- Supporting Agency End Users
- HMIS Security
- Program Audits
- Monitoring
- Managing
- Reporting
- Correcting

At any point the CoC retains the ability to suspended Agency Admin's access based on the following areas:

- Lack of knowledge/technical ability
- Poor performance
- Failure to follow HMIS Data Quality Plan
- Lack of participation of the HMIS Committee meetings ( Attendance a 75% of scheduled meetings is required)

The HMIS System Administrator will work with the Agency Administrator to increase performance. If the Agency Administrator continues to demonstrate poor performance, the CoC Lead Agency will contact the necessary Agency management for discussion of a suitable replacement.

**Participating Agency:** shall follow, comply, and enforce the HMIS Agency Participation Agreement (Appendix A). The Executive Director must sign an HMIS Agency Participation Agreement (MOU) before granted access to HMIS. Signing of the HMIS Agency Participation Agreement is a precursor to training and user access. An original signed HMIS Agency Participation Agreement must be presented to the CoC lead agency before any Provider/Program is implemented in the HMIS.

Participating Agencies should Set the tone for the agency's commitment to data quality , monitor a project's data quality , prepare for APR requirements or HUD system reporting requirements and resolve any data quality findings as quickly as possible.

## **Privacy Plan**

### **CLIENT INFORMED CONSENT AND PRIVACY RIGHTS**

Participating Agencies must obtained informed, signed consent prior to entering any client personal identifiable information into HMIS. Services will not be denied if a client chooses not to include personal information. Personal information collected about the client should be protected. Each Participating Agency and end user must abide by the terms in the HMIS Agency Participation Agreement and HMIS User License Agreement.

- Client must sign the Authorization to Disclose Client Information form or consent of the individual for data collection may be inferred from the circumstances of the collection. Participating Agencies may use the ROI to meet this standard.
- Clients that provide permission to enter personal information allow for Participating Agencies within the continuum to share client and household data.
- If client refuses consent, the user may collect the client information on a paper intake form and store this information in the person(s) physical folder.
- Participating Agencies shall uphold Federal and State Confidentiality regulations and laws that protect client records.

The HMIS standards and the HIPAA standards are mutually exclusive. An organization that is covered under the HIPAA standards is not required to comply with the HMIS privacy or security standards, so long as the organization determines that a substantial portion of its protected information about homeless clients or homeless individuals is indeed protected health information as defined in the HIPAA rules.

HIPAA standards take precedence over HMIS standards. The CoC will with the Agency discuss to determine which standard supersedes at the provider or project level.

#### **Data Use and Disclosure**

All end users will follow the data use Policies and Procedures to guide the data use of client information stored in HMIS.

Client data may be used or disclosed for system administration, technical support, program compliance, analytical use, and other purposes as required by law. Uses involve sharing parts of client information with persons within an agency. Disclosures involve sharing parts of client information with persons or organizations outside an agency.

Participating Agencies may use data contained in the system to support the delivery of services to homeless clients in the continuum. Agencies may use or disclose client information internally for administrative functions, technical support, and management purposes. Participating Agencies may also use client information for internal analysis, such as analyzing client outcomes to evaluate program.

The vendor and any authorized subcontractor shall not use or disclose data stored in HMIS without expressed written permission in order 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 individually by the HMIS Lead Agency and vendor contain language that prohibits access to the data stored in the software except under the conditions noted above.

Information reporting person's information to the level which can identify the person shall not be allowed. Information such as the person(s) name, identifying them with addressing, and other information will be kept secured.

All reporting or request of technical support will refer only to the person(s) unique record number to which maintains level of confidentiality.

#### **Data Release**

All HMIS stakeholders will follow the data release Policies and Procedures to guide the data release of client information stored in HMIS.

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 Continuum. It may not release any personal identifiable client data to any group or individual.

### **Data Removal of Information**

Information will remain stored in the database for up to 7 years from the last record update. At the point the CoC may remove the person's profile and history from the database.

### **Privacy Notice Requirement**

Each Agency must adopt the standard Notice of Uses and Disclosures and Privacy Notice. Every agency must post the notice and offer a copy of the notice to each client, in accordance with Client Notification and Consent Procedures. If an agency maintains a public web page, the agency must post the current version of the Notice of Uses and Disclosures and Privacy Notice on their web page.

## **Security Plan**

### **User Authentication & Licenses**

Only users with a valid username and password combination can access HMIS. The HMIS staff will provide unique username and initial password for eligible individuals after the required completion:

The Participating Agency will determine which of their employees will have access to the HMIS. User access will be granted only to those individuals whose job functions require legitimate access to the system.

The Agency Admin staff will provide the end user a HMIS User License Agreement aka "User Agreement" for signature after completing required training.

- Original User Agreement forms must be completed and kept by the CoC
- A username and password will be granted to end users after required training is completed
- New User's logon ID is considered temporary until they complete the initial certification training held four (4) times a year at the CoC.
- Those users who do not attend the class will have the ID disabled by the CoC until the certification class has been successfully completed.
- User Agreement expires in January of each year. Recertification class must be taken to renew the User Agreement
- HMIS ID's and Passwords
- Sharing of usernames and passwords is a breach of the HMIS User License Agreement since it compromises the security to clients
- The Local Agency Admin is required to remove the person's ID from HMIS and notify the COC when end user leaves employment
- The CoC maintains the right to disable users not logging into HMIS for more than 45 days.
- The CoC maintains the authorization to reallocate unused HMIS license's based on the Continuum wide needs

## **Passwords**

Each end user will have access to HMIS via a username and password. End users will maintain passwords confidential.

- Users will be required to create a permanent password that is between eight and sixteen characters in length. It must also contain characters from the following three categories:
- Uppercase characters (A through Z)
- Lower case characters (a through z)
- Numbers (0 through 9)
- Password will be changed approximately every 45 days
- Users may not use the same password consecutively and are highly suggest not repeating passwords or changing them with consecutive patterns
- Access permission will be revoked after the end user unsuccessfully attempts to log on three times. The end user will be unable to gain access until the local Admin resets their password
- ID and password shall not be shared between staff members. Discovery of this breach will result in written notice from the CoC to the provider and disabling of the person(s) HMIS ID access
- Passwords shall not be noted down, or displayed openly. Discovery of this breach will result in written notice from the CoC to the provider and disabling of the person(s) HMIS ID access
- Local ADMIN will disable or change the password of the User on extended leave
- Local Admin will delete USER ID's when the person has left the Agency's

## **Hardware Security Measures**

All computers and networks used to access HMIS must have virus protection software and firewall installed or utilized Cell Wireless communication nothing less than 4G technologies. Agency should refrain accessing the HMIS database using OPEN ACCESS WIFI access. Virus definitions and the computer operating system must be regularly updated on both computer and server (if used). Computers must be locked or logoff the network when not in the hands of the agency staff.

## **Security Review**

The CoC will complete an "unannounced" annual security review to ensure the implantation of the security requirements for itself and Participating Agencies. The security review will include the completion of a security checklist ensuring that each security standard is implemented.

### **Areas to which may be checked:**

- Password breaches (i.e. written down or stored electronically "unsecured")
- Synchronized passwords (i.e. general password used on multiple logon ID's.)
- Computer / Network vulnerability
- HMIS database vulnerability

## **Stored HMIS Data Information**

All "stored" information (not of database) i.e. reports, screen prints or any reproduction of the database information, must be store in a secured folder with limited access (if on a server base machine). Secure external storage device or secured paper storage. HMIS data should not be stored on any local hardware (drive). All paper or electronic stored document MUST BE properly destroyed when the information has exceeded its expected life cycle. All data stored in the database is considered shared between all participating agencies of the CoC.

### **Security Violations and Sanctions**

Any user found to be in violation of security protocols of their agency's procedures or HMIS Policies and Procedures will be sanctioned accordingly. All users must report potential violation of any security protocols.

***Users are obligated to report suspected instances of noncompliance and/or security violations to their agency and/or HMIS staff as soon as possible. Such as:***

- Computers left in vulnerable condition
- Unauthorized access to the computer system or HMIS software
- HMIS information in electronic or paper or access to the database left for open viewing
- External storage devices (i.e. CD/DVD, thumb drives, other storage devices) left unattended in an unsecured environment.
- The Participating Agency or CoC HMIS staff will investigate potential violations.
- Any user found to be in violation of security protocols will be sanctioned accordingly. Sanction may include but are not limited to suspension of system privileges and revocation of system privileges.