

Capital Region Homeless Management System
(HMIS)
Policies & Procedures Manual



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Introduction

In order to implement and maintain a region-wide Homeless Management Information System (HMIS), CARES and the HMIS Advisory Committee have developed the following Policies and Procedures Manual to outline and define the goals and objectives of the Capital Region HMIS. This document delineates the roles and responsibilities of each agency involved in the project. Each participating agency is asked to sign the agreement form on the last page indicating that the agency has reviewed these policies and procedures and will comply with them.

The Capital Region HMIS is comprised of Albany, Columbia, Hamilton, Greene, Jefferson, Lewis, Rensselaer, St. Lawrence, Saratoga, Schenectady, Washington and Warren counties. The Capital Region represents an area that includes a population of approximately 750,000. More than one hundred agencies operate close to 2,500 shelter, transitional living, and permanent supportive housing beds for people who are homeless in the Capital Region. Under the auspices of CARES, the majority of these agencies are jointly participating in a regional HMIS to support local data collection, service and planning functions, and to fulfill the HMIS directive from HUD. The Capital Region HMIS captures client-level information over time regarding the characteristics and service needs of individuals and families experiencing homelessness within participating counties.

Purpose of the CR-HMIS

- To meet HUD's requirement to produce an unduplicated count of homeless
- To develop new means of regional collaboration
- To facilitate continuity of care in homeless services
- To develop programs that are responsive to the needs of homeless individuals and families

In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to implement a national data collection system to produce an unduplicated count of persons using homeless services. The Homeless Management Information System (HMIS) is a computerized data collection system used by multiple agencies to capture the number, characteristics and demographic information of persons utilizing these services.

The Capital Region HMIS has a tremendous capacity to strengthen the collaboration among homeless service providers. Utilizing this coordinated system to count and track homeless trends in the Capital Region has allowed providers to collect data using a universal language for the first time. Methods and procedures for recording use of service are standardized, thereby giving all service providers a common denominator for discussions about the quantity and quality of

services. Perhaps most important, homeless service providers are working together in a new manner to track those activities and trends that transcend the individual agency.

Goals

- ***Unduplicated count:*** The HMIS will provide an unduplicated count of the number of individuals accessing services from homeless service providers in the Capital Region.
- ***Service tracking and trends:*** The HMIS will identify demographic and service utilization trends.
- ***Streamlined referral process:*** The HMIS will create a comprehensive database of homeless services throughout the twelve county region.
- ***Enhanced service delivery:*** Through tracking client service trends, the HMIS will identify service areas in need of enhancement and growth.
- ***Information for policymaking:*** Aggregate data will be shared with homeless service advocates, government officials and researchers. This information will better inform our understanding of homelessness and guide public policy and program development.

Participation

All recipients of HUD McKinney-Vento funds are required to participate in the HMIS. This includes recipients of Emergency Shelter Grant (ESG) funds, Supportive Housing Program (SHP), Shelter Plus Care (S+C), Section 8 Mod Rehab for SRO. In addition, persons using the Housing Opportunities for Persons with AIDS (HOPWA) services must also be included. HUD also encourages participation of all agencies who serve the homeless population, including those funded by both other federal programs and non-government sources. Participation of organizations that do not receive HUD Continuum of Care funding is voluntary, but strongly encouraged in order to achieve an accurate picture of homeless services in the Capital Region.

Benefits to the Capital Region Continuums of Care

In addition to fulfilling the HUD requirements, participation in the HMIS enables the twelve participating counties to report accurate statistical data to funders and policy makers regarding clients' financial resources, county of origin, and use of services. It ensures that all local providers are using a common intake instrument, thereby providing the most effective and efficient service to clients. In addition, individual agencies benefit from the ability to electronically manage their client records and generate reports in a timely and accurate manner.

Administrative Structure:

There are three major components to the Capital Region Homeless Management System's administrative structure: the Implementation Team, Lead Agency and Advisory Committee.

Lead Agency

The lead agency for the Capital Region HMIS is the Corporation for AIDS Research, Education and Services (CARES Inc.). CARES, Inc. is a not-for-profit agency whose mission is assisting local communities in expanding housing and other resources for homeless persons and/or persons with disabilities. As the lead agency for coordinating the Continuum of Care groups in six Capital Region Counties, CARES was asked by providers to assume responsibility for the HMIS development and implementation. Having led the initial implementation of the HMIS in those counties, CARES continues to act as the System Administrator for the HMIS, providing ongoing training, technical assistance, consulting, database management, reporting and help desk support to the Continuums of Care with the HMIS. CARES also acts as an intermediary between the software vendor and participating agencies, handling the billing and payments for the software and keeping current with the HUD requirements and trends.

Training

CARES offers on-going User training for new Users and for current users who need a refresher on the basics. Training sessions will be provided in 3-hour sessions for which attendees are required to sign up in advance. Users participating in each training session are expected to be computer-literate and to attend the full training session.

Additionally, Advanced User trainings, Program Director and Administrator trainings, regular usergroups and periodic CoC updates will be held regularly to help agencies best use and monitor the HMIS system and accompanying software.

Technical Assistance

All concerns with utilizing the HMIS system should be directed to Allyson Thiessen at CARES. Allyson can be reached by phone at 489-4130 and by e-mail at allysont@caresny.org or through the HMIS (AWARDS) internal messaging and helpdesk modules for confidential e-mail capability. CARES offers assistance to agencies trying to better integrate the use of the HMIS software into existing procedures through telephone conferences and occasional site visits. Assistance in gathering agency or County-wide aggregate information for funding sources and grant writing is also available when a written request is made at least a week in advance.

Community Reporting with the HMIS

Each month the HMIS System Administrator exports a system-wide aggregation of data. This information is utilized to determine which agencies are compliant with the system. It is also used to identify areas that need to be more thoroughly defined for individual agencies. Additional training or technical assistance is made available based on need.

Quarterly and annual reports are generated to share with the entire Capital Region HMIS. These reports include a summary of the number of individuals participating in services in each program for the given time period. These reports do not include names, social security numbers, or any other identifying characteristics of individual clients. Trends in the quarterly and annual reports are examined by the HMIS Advisory Committee and reported to the CoC governing body.

HUD-required reports are generated and distributed after notifying all participating agencies of the request. Under no circumstances is client-level data distributed.

Individual agency data results are not distributed or publicized by agency name without permission from the participating agency. Agency data results are aggregated with other like programs within the county and/or region to identify community trends. In cases where an individual agency is the only service provider within a county, aggregated data is not released with the attached agency name.

Implementation Committee

The role of the Implementation Committee is to establish community goals for the HMIS, and assist the lead agency with investigating, choosing and negotiating a contract with a software vendor. In addition, the Implementation Committee assists in coordinating the implementation of the HMIS community-wide, addressing issues and concerns along with the lead agency to help make the HMIS both functional and beneficial within the community.

Advisory Committee

The role of the Advisory Committee is to facilitate a better working HMIS and to continue to make sure that it meets the needs of the Continuums of Care as well as HUD, an Advisory Committee made up of representatives from each county meets quarterly. It is the role of this committee to bring forward issues of particular concern to their Continuum of Care coordinating body in order to find solutions to problems or issues that come up with the HMIS and to set standards regarding such issues as: consumer privacy and confidentiality, regular reporting schedules, information sharing, software choices, and user/agency monitoring.

Privacy and Security

Baseline privacy standards are required of all programs and must balance the need to protect the confidentiality of client data with the practical realities of homeless service providers. Each agency is requested to review and/or develop a privacy policy specific to individual agency needs that includes HMIS activities as it pertains to confidential client data. A copy of the agency privacy policy must be provided to CARES, Inc., the HMIS System Administrators.

This privacy policy may include, but is not limited to the following activities:

- Post a sign at each intake desk or comparable location that gives a general explanation of the reasons for collecting client information.
 - Distribute a written Privacy Notice to clients.
 - Post the agency Privacy Notice on the agency's website.
- In addition, each agency is asked to:
- Maintain permanent documentation of all Privacy Notice amendments.
 - Ensure that staff members and volunteers at the agency comply with the Privacy Notice.
 - Install and maintain a firewall on the user's computer or the agency network.

HMIS Access

The AWARDS software is a web-based software system accessed through the Internet. Each agency user is assigned a log-in name and a password to access the system. Each user is assigned specific permissions to view and work only with those programs and records he or she has been assigned. A user in one program within an agency could be prohibited from viewing or modifying any records in another program area and, because at this time no Continuums of Care are data sharing through the system, no user can access the files of any other agency. All users are reminded to never share their log-in names or passwords with anyone else.

Software Security

Maintaining individual client privacy is among the highest priorities in managing the HMIS. The AWARDS software includes the latest 128-bit encryption process that renders it completely unintelligible to outsiders and intruders (this is the same as online security used by banks). Information sent from individual agency sites cannot be unscrambled. In addition, a highly sophisticated series of user names and passwords protect data from unauthorized viewing and manipulation within individual agencies, ensuring no one has access to information they should not see. Data security is also monitored by the System Administrator through regular reports and activities.

HIPAA Compliance

Compliance with HIPAA regulations is only required for covered entities; community service providers that are also determined to be health care providers. For agencies that meet these criteria, participation in the HMIS requires compliance with HIPAA as defined and arranged within the agency. CARES, as the System Administrator, follows HIPPA precautions with all consumers in all agencies.

Distribution of HMIS Data

CARES Inc. will provide quarterly and yearly reports on the aggregate data collected within the HMIS to the corresponding CoCs as well as the Advisory Committee. This is public information and, upon written request, a copy of the latest and historical reports will be provided to anyone.

Aggregate, County-wide data will be provided to HUD annually through the AHAR report.

Aggregate and individual agency-level data may be provided to users and administration of that agency upon request for data-quality reasons or to meet agency need. Non-users within an agency requesting any aggregate or individual data must have the written consent of the agency Executive-Director.

Individual identifying information, Agency level information or any aggregate data that may potentially point out an individual or single agency will not be distributed in any reporting. Individuals, agencies or governing bodies who wish individual or agency level data will need to go through that agency's Executive Director for that information to avoid conflict with the CR-HMIS privacy policies.

Responsibilities

Participating agencies and users both have specific responsibilities when using the HMIS to ensure proper functioning of the system, accurate data collection as well as the privacy and security of all consumers. These responsibilities are outlined below.

Participating Agency Responsibilities

CARES will enter into a Business Associates Agreement with agencies that are eligible to participate in the HMIS. The Business Associates Agreement will outline the specific manner in which CARES will utilize the data submitted in the HMIS.

The participating agency is responsible for all activities associated with agency staff access and use of the Foothold Software System (AWARDS). The agency will be held responsible for any misuse of the software system by the designated staff.

It is recommended that each participating agency:

- Establish operating practices to ensure organizational adherence to the HMIS Policies and Procedures.
- Establish a privacy policy to ensure the protection the confidential client data.
- Communicate operating practices including privacy protection and User responsibilities to agency users. Document that each User understands and accepts the User responsibilities.
- Monitor compliance and periodically review control decisions.
- Edit and update agency information, including staff, location, and capacity, as needed.
- Train new staff on the uses of the Foothold software system, including a review of the Capital Region HMIS Policies and Procedures and any agency operating practices and privacy notice.
- Notify all Users in their agency of interruptions in service.
- Detect and respond to violations of the Policies and Procedures or agency procedures.
- Maintain complete and accurate client records.

User Responsibilities

Each User within a participating agency is responsible for maintaining client privacy and protecting each client's protected personal information. Client information shall include, but not be limited to: client's name, address, telephone number, social security number, type of medical care provided, medical condition or diagnosis, veteran status, employment information, and any and all other information relating to the client's programming.

A User ID and Password will be provided to each User within the agency by the System Administrator.

All Users must understand and accept the following responsibilities for utilizing the HMIS:

- The User ID and Password are for User use only and must not be shared with anyone. All Users will take all reasonable means to keep Passwords physically secure.
- All Users will log-off the system before leaving the work area.
- Users must not decline services to a client or potential client if that person refuses to allow entry of information in the HMIS (except if that policy is over-ridden by agency policy or if the information is required to be collected as a condition of receiving services).
- The User has primary responsibility for information entered by the User. Information entered by users is truthful, accurate and complete to the best of the User's knowledge.
- Users will not solicit from or enter information about clients into the HMIS unless the information is required for a legitimate program purpose such as to provide services to the client.
- Any hard copies of personally identifiable (client-level) information printed from the HMIS must be kept in a secure file, and destroyed when no longer needed.
- All Users must immediately notify the Agency Executive Director should a breach in security be recognized or suspected.

- Users may only access the HMIS from a designated terminal, following agency guidelines for electronic access of records. Access to the HMIS from public or unsecured computers and networks is prohibited.
- Users may not send identifying information on clients through standard e-mail but, instead, should utilize the secure messaging feature of the HMIS-AWARDS system for all client-based communications, preferably through a helpdesk ticket.

Data Entry

In order for data to be meaningful across program sites, data must be consistently added and updated in the AWARDS system. HUD has identified minimum data standards with which all participating agencies must comply. Information for these minimum data fields must be gathered at each site, and regularly updated throughout the client's stay with the program. All data will be collected at intake and discharge. While agencies are not currently required to maintain real-time data records, it is important that all data be complete and up-to-date within two weeks of client activity.

HMIS Software

After an extensive and objective selection process that was guided by the HMIS Implementation Committee, CARES contracted with Foothold Technology as the software vendor for the Capital Region HMIS. Foothold's software, AWARDS, is a web-based system in which users access the system over the Internet. The AWARDS software includes a comprehensive case management software system that each agency can utilize for managing client records, case notes, and referral information, if desired.

Universal and Program Level Data Elements

Universal and program level data elements have been established by HUD and must be collected by all agencies serving homeless persons. These data elements make it possible to obtain unduplicated estimates of the number of homeless persons accessing services from homeless providers and also provide basic demographic characteristics of people who are homeless, and their patterns of services. Using the universal data standards will also allow measurement of the number and percentage of chronically homeless people who use homeless services. The HMIS software has safeguards built into the intake and discharge so that an intake may not be completed without filling in these data elements; however, due to changes in HUD requirements and upgrades to the software, it may be necessary for some agencies to correct historical data to become compliant with the current HUD technical data standards. Additionally, the Continuum of Care may request that specific, non-required fields be filled out for community planning purposes.

System User Licensure

Each program within an agency will be permitted a specific number of program users to access the HMIS. The participating agency's HMIS System Administrator will have the ability to add these users to the system as needed. Agencies exceeding the permitted number of system users will be charged an additional monthly fee. For such fees, CARES will generate a standardized invoice and submit to the participating agency's HMIS system administrator.

Participating Agency Fee Structure

At this time, the use of the AWARDS software system will be available to each participating agency free of charge and will remain so as long as funds continue to be available through HUD, the State of New York, and private funders. All HMIS participants will be made aware of continued funding availability for this program and will given a minimum of six months should individual agencies be required to accept some of the financial responsibility for the program.

Program Customization

The AWARDS software can be modified to meet specific needs of an agency. Customizations that are above and beyond those created for the Capital Region HMIS will be completed at an additional expense to the agency. All private program customizations will be facilitated and contracted through CARES, Inc.

Modifications that could be completed at an additional charge may include, but are not exclusive to: additional number of users, additional training, program customization, additional security to allow transfer of data among specific agencies, and others that are outside those identified by the HMIS Implementation Team.

Data-Sharing

Data-sharing may be used among programs for case management purposes. Data-sharing can be used to streamline the intake process and reduce duplication of benefits. ***However, due to security and confidentiality issues, data will not be automatically shared among agencies.***

Data sharing among collaborating agencies is possible and would lend itself to reduction of duplicate data entry. To establish security among two or more agencies, additional fees will be assessed. In addition, consent agreements and release of information must be completed by the individual client prior to establishing this system.

Agency Agreement

_____ of _____
(Name/Title) (Agency)

has reviewed the Capital Region HMIS Policies and Procedures document. My agency and I agree to comply and adhere to the guidelines as defined.

(Signature)

(Date)