# Stanislaus Community System of Care Collaborative Homeless Management Information System (HMIS) Policies and Procedures

**Continuum of Care:**
CA-510 Turlock, Modesto/Stanislaus County

**Stanislaus Community System of Care Collaborative, HMIS Administrator:**
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Housing and Homeless Division
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# 1. INTRODUCTION

This document provides the framework for the ongoing operations of the Stanislaus Community System of Care Collaborative Homeless Management Information System (HMIS) Project. The Project Overview provides the main objectives, direction and benefits of the Stanislaus County HMIS Project. Governing Principles establish the values that are the basis for all policy statements and subsequent decisions.

Operating Procedures will provide specific policies and steps necessary to control the operational environment and enforce compliance in the following areas:

- Project Participation
- User Authorization
- Collection of Client Data
- Release of Client Data
- Server Security and Availability
- Workstation Security
- Training
- Technical Support

Other Obligations and Agreements will discuss external relationships required for the continuation of this project. Forms Control provides information on obtaining forms, filing and record keeping.

# 2. PROJECT OVERVIEW

The Stanislaus County Homeless Management Information System (HMIS) is a collaborative project of the Stanislaus Community System of Care Collaborative (StanCSOC) on Affordable Housing and Homelessness Administered by the Stanislaus County Community Services Agency, (HMIS Lead Agency). Stanislaus County HMIS will enable homeless service providers to collect uniform client information over time. This system is essential in the effort to streamline client services and informed public policy. Through Stanislaus County HMIS, homeless program clients benefit from improved coordination in and between agencies, informed advocacy efforts and policies that result in targeted services. Analysis of information gathered through Stanislaus County HMIS is critical to accurately calculate the size, characteristics and needs of the homeless population; this data is necessary to the services and systems planning and advocacy.

The McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), requires that the U.S. Department of Housing and Urban Development (HUD) ensure the operation of a communitywide HMIS, with consistent participation by recipients and sub-recipients of applicable federal grants. Agencies funded by certain grants are required to participate in their local HMIS, such as:

- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Veterans Affairs
- U.S. Department of Health and Human Services (HHS)

- Runaway and Homeless Youth (RHY)
- Substance Abuse and Mental Health Services Administration (SAMHSA)
- Other local and state agencies

Additionally, some privately funded providers participate on a voluntary basis.

The mission of the Homeless Management Information System of the Collaborative is to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet federal requirements, but also enhance service planning and delivery.

The fundamental goal of the Stanislaus County HMIS Project is to document the demographics of client(s) that are homeless or at risk of homelessness in Stanislaus County according to the HUD HMIS Data Standards. It is the goal of the project to identify patterns in the utilization of assistance and document the effectiveness of the services for the client. This will be accomplished through analysis of data gathered from the actual experiences of homeless person(s) and the service providers who assist them in shelters and/or homeless assistance programs throughout the county. Data that is gathered via intake interviews and program participation will be used to complete the following mandated reports:

- HUD Annual Progress Reports (APR)
- Homeless Point in Time County (PIT)
- Housing Inventory Count (HIC)
- Longitudinal systems Analysis (LSA)
- System Performance Measures (SPMs)
- Family & Youth Services Bureau (FYSB)
- Runaway and Homeless Youth (RHY)
- Emergency Solutions Grant Consolidated Annual Performance and Evaluation Report (CAPER)
- Substance Abuse and Mental Health Services Administration (SAMHSA)
- Projects for Assistance in Transition from Homelessness (PATH)
- Department of Veteran Affairs, Supportive Services for Veterans and Families Program (SSVF)

This data may also be analyzed to provide unduplicated counts and anonymous aggregate information to develop a more complete understanding of client's needs and outcomes, to identify gaps in services and then used to advocate for additional resources. It may also serve to complete other service reports used to inform policy decision making aimed at addressing and ending homelessness at local, state and federal levels.

The project utilizes the Data System International, Eccovia Solutions/ClientTrack™ as their HMIS software application. This is a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the county. Access to the central server is limited to agencies formally participating in the project and to their authorized staff members that meet the necessary training and security requirements.

The Stanislaus county HMIS Project Lead Agency is staffed and advised by the Community Services Agency. As the HMIS Lead, CSA manages the day-to-day operations of the HMIS system, including

system implementation and customizations, data privacy and security, and compliance with CoC and HUD reporting requirements. CSA monitors Partner Agency participation, data collection and data quality based on the completeness, consistency, accuracy and timeliness of the data entered. Thus, CSA serves as the data foundation for the Stanislaus Community System of Care Collaborative plan to prevent, reduce and eliminate homelessness.

The Community Services Agency Director or designee is the authorizing agent for all agreements made between Partner Agencies and the Community Services Agency. The HMIS System Administrator staff is responsible for the administration of the Eccovia Solutions/ClientTrack™ software, the control of user access and to act as the liaison with the HMIS software vendor. HMIS Project staff will also provide technology, training and technical assistance to users of the HMIS system throughout the county.

The CSOC Leadership Council is responsible for oversight and guidance of the Stanislaus County HMIS Project. This group is committed to balancing the interests and needs of all stakeholders involved: homeless men, women and children; services providers; and policy makers.

## 3. GOVERNING PRINCIPLES

Participants are expected to read, understand and adhere to the spirit of these principles, even when the Policies and Procedures do not provide specific direction.

Described below are the overall governing principles upon which all decisions pertaining to the Stanislaus county HMIS Project are based.

*Confidentiality*
The rights and privileges of clients are crucial to the success of HMIS. These policies will ensure clients' privacy without affecting the delivery of services, which is the primary focus of agency programs participating in this project.

Policies regarding client data will be founded on the premise that a client owns his/her own personal information and will provide the necessary safeguards to protect client, agency and policy level interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

*Data Integrity*
Client data is the most valuable and sensitive asset of the Stanislaus County MIS Project. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

*System Availability*
The availability of centralized data repository is necessary to achieve the ultimate countywide aggregation of unduplicated homeless statistics. The System Administrator is responsible for ensuring the broadest deployment and availability for homeless service agencies in Stanislaus County.

*Compliance*
Violation of the policies and procedures set forth in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity will result in the withdrawal of system access for the offending entity.

## 4. GENERAL UNDERSTANDING

In this Agreement, the following terms will have the following meanings:

a. "Client" refers to a consumer of services.
b. "Partner Agency" refers generally to any agency, organization or group who has a signed MOA with CSA and is participating in HMIS.
c. "Agency Staff" refers to both paid employees and volunteers.
d. "End User" refers to an active HMIS user that has current login privileges.
e. "HMIS" refers to the Homeless Management Information System administered by CSA.
f. "Entry" or "Enter(ing)" refers to inputting any Client information into HMIS.
g. "Shar(e)(ing)" or "Information Shar(e)(ing)" refers to exchanging information in HMIS with a Partner Agency(ies).
h. "Identifiable Information" refers to Client data that can be used to identify a specific Client; also referred to as "Confidential" data or information such as a Client's name or social security number.
i. "CHO" refers to a Covered Homeless Organization which is any organization (including its employees, volunteers, affiliates, contractors and associates) that records, uses or processes Protected Personal Information (PPI) belonging to homeless Clients in HMIS.
j. "De-identified Information" or "Non-identifying Information" refers to data that has specific Client demographic information removed, allowing the use of data *without identifying* a specific Client, such as data elements: 2.1 Name, 2.2 SSN and 2.3 DOB.

Client information is collected in HMIS and shared with housing and services providers (individually, a "Partner Agency" and collectively, the "Partner Agencies"), which include community based organizations and government agencies.

Partner Agencies use the information in HMIS to:

- Improve housing and services quality
- Coordinate referrals and placements for housing and services
- Identify patterns and monitor trends over time
- Conduct needs assessments
- Prioritize services for certain homeless and low-income subpopulations
- Enhance inter-agency coordination
- Monitor and report on the delivery, impact and quality of housing and services

# 5. ROLES AND RESPONSIBILITIES

5.1     Stanislaus Community System of Care Collaborative

SCOC Leadership Council
- Project direction and guidance
- Executive plan
- Approval of project forms and documentation
- Project participation and feedback
- Project funding
- Software selection

5.2     Community Services Agency, CoC HMIS Administrator

CoC HMIS Administrator "Lead Agency" (Community Services Agency) H & H Director or Designee
- Liaison with HUD
- Project staffing
- Signature for *Stanislaus County HMIS Memorandum of Agreement*
- Responsible for overall success of the Stanislaus county HMIS Project

HMIS System Administrator
- Domain registration
- Procurement of software and licenses
- End user licenses
- Supervise HMIS Specialist
- Creation of project forms and documentation
- Grant/project configuration
- Project policies and procedures and compliance
- General responsibility for project rollout
- Software administration
    - Configuration and availability
    - Setup and maintenance of hardware
    - Installation and maintenance of software
    - Configuration of network and security layers
    - Anti-virus protection for server configuration
- Keeper of signed copy of *Stanislaus County HMIS Memorandum of Agreement*
- Keeper of copy of *Client HMIS Grievance Form* or written notice of grievance from Partner Agency
- Keeper of signed original of *User Policy, Responsibility Statement & Code of Ethics*
- Keeper of signed original of *Partner Agency Administrator Agreement*
- User Administration
    - Add and Remove Partner Agency Administrators
    - Manage User Licenses
- System Uptime and Performance monitoring

- Security audits
- Ongoing protection of confidential data
- Receives and responds to HMIS grievances, updates CSOC Advisory Council
- Software troubleshooting
- Application customization
- Data validity
- Community aggregate data reporting and extraction
- Assist Partner Agencies with technical issues and concerns
- Liaison with HMIS software vendor

HMIS Specialist
- Curriculum development
- Training documentation
- Software training
- Application training for agency administrators and end users
- Outreach/end user support
- Training timetable
- Helpdesk
- Project website
- Security audits
- Adherence to HUD Data Standards
- Data quality
- Data monitoring
- Data validity
- Aggregate data reporting and extraction
- Assist Partner Agencies with agency-specific data collection and reporting needs (within reason and within constraints of other duties)
- Internet connectivity troubleshooting
- Software troubleshooting

HMIS Vendor
- Maintain database servers
- Perform data backup
- Software troubleshooting
- Creation of custom workflows outside of HMIS standards
- Customizations to the code of ClientTrack™
- HMIS Lead Support

5.3    Partner Agency (PA)

Partner Agency Executive Director
- Authorizing agent for signing *Stanislaus County HMIS Memorandum of Agreement* and *Partner Agency Administrator Agreement,* if applicable
- Responsible for Partner Agency compliance with *Stanislaus County System of Care*

*Collaborative HMIS Policies and Procedures*
- End user licenses
- Authorizing agent for *User Policy, Responsibility Statement & Code of Ethics* agreements
- Agency level HUD reporting
- Creation and posting of *Privacy Notice for Covered Homeless Organizations*
- Ensure that agency staff read, understand and abide by the *Privacy Notice for Covered Homeless Organizations*
- Posting of *Consumer Notices*
- Assign staff as Partner Agency HMIS contact person(s). (*this could be the Executive Director*)
- Responsible for establishing security standards for any paper or other hard copy containing personal protected information generated by HMIS
- Each Partner Agency Executive Director is responsible for their agency's internal compliance with the HUD HMIS Data Standards

Partner Agency Technical Administrator
- Authorizing agent for user ID requests
- Internet connectivity
- Detecting and responding to violations of the Policies and Procedures
- Keeper of copies of the *User Policy, Responsibility Statement & Code of Ethics* agreements
- Keeper of executed *Client Informed Consent and Release of Information, Client Denial of HMIS Consent* and *Client Revocation of HMIS Consent* forms

Partner Agency Security Officer
- Establish and maintain an agency HMIS Security Plan
- Report any system security threats or hazards
- Report breaches of confidentiality
- End user adherence to workstation security policies
- Conduct Site Security Assessments

Partner Agency HMIS Contact Person
- First level end user support
- Authorizes importing of Client data
- Maintain Agency/Program Data in HMIS
- Communicate with the HMIS staff within 48 hours of original requests or correspondences
- Ensure that HMIS end users do not knowingly enter erroneous information into HMIS

Partner Agency End User
- Safeguard Client privacy through compliance with all confidentiality policies including, but not limited to: *User Policy, Responsibility Statement & Code of Ethics, Stanislaus County HMIS Policies and Procedures* and the Partner Agency's *Privacy*

- Data collection as specified by training and other documentation
- Refrain from including profanity, offensive language, malicious information or discriminatory comments based on race, ethnicity, religion, national origin, disability, age, gender or sexual orientation into the database
- Will not alter or over-write information entered by a Partner Agency with the exception of basic demographic information if data was not confirmed or correct
- Refrain from knowingly entering erroneous information into HMIS

# 6. OPERATING PROCEDURE

6.1 Project Participation

Policies
- Agencies participating in the Stanislaus county HMIS Project shall abide by the governing principles of the Stanislaus County HMIS Project and adhere to the terms and conditions of this partnership as detailed in the Memorandum of Agreement.

Procedures
- Use of HMIS
  - Agency will not access identifiable information for any individual for whom services are neither sought nor provided by the Agency.
  - Agency may report non-identifying information to other entities for during or planning purposes. Such non-identifying information shall not directly identify individual Clients.
  - Agency will use HMIS database for legitimate business purposes only.
  - Agency will not use HMIS in violation of any federal or state laws, including but not limited to, copyright, trademarked and trade secret laws and laws prohibiting the transmission of material that is threatening, harassing or obscene.
  - Agency will not use the HMIS database to defraud federal, state or local governments, individuals or entities, or conduct any illegal activity.
  - Agency shall take due diligence not to cause in any manner, way or corruption of the HMIS database, and Agency agrees to be responsible for any damage it may cause.

- Participation Requirements
  - In order to participate in the Stanislaus County HMIS and become a Partner Agency, the CHO, must complete the *HMIS Agency Access Application, Partner Agency Administrator Agreement and Memorandum of Agreement.* Agencies participating in the Stanislaus County HMIS Project shall commit to abide by the governing principles of the Stanislaus County HMIS Project, adhere to the terms and conditions of this partnership as

detailed in the Memorandum of Agreement and agree to the following:

- Provide a copy of the Grant Scope of Work.
- Notify Stanislaus county HMIS of any Grant/Project/Scope of work changes within 7 days of the change to HMIS@stancounty.com.
- Provide quarterly *HMIS Bed & Unit Inventory Update* to assist with tracking accurate HIC data at the end of the year.
- Provide monthly Data Quality Reports to HMIS staff by the 10th of every month.
- Post *Stanislaus County HMIS Client Privacy Rights and Stanislaus County HMIS Consumer Notices* at each intake desk or comparable location.
- Communicate with the HMIS staff within 48 hours of original requests or correspondences.
- The Agency will conduct site security assessments.
- The Agency will utilize HMIS as part of the CoC's Coordinated Entry for all systems in accordance with the CoC Policies and Procedures. Use of HMIS for Coordinated Assessments includes, but is not limited to, entering data from the triage assessment survey recommended by the County in order to place Clients into the community queue for prioritization in housing programs and accepting referrals for Clients from the community queue.

- Termination of Participation
  - Voluntary Termination:
    - The Partner Agency shall inform the HMIS system Administrator in writing of their intention to terminate their agreement to participate in the Stanislaus County HMIS Project.
    - The HMIS System Administrator will inform the Community Services Agency HMIS Administrator Manager and update the Participating Agency list.
    - The HMIS System Administrator will revoke access of the Partner Agency staff to the Stanislaus County HMIS.
      i. NOTE: All Partner Agency-specific information contained in the HMIS system will remain in the HMIS system.
    - The HMIS System Administrator will keep all termination records on file with the associated Memorandum of Agreement.

  - Lack of Compliance:
    - When the HMIS System Administrator determines that a Partner Agency is in violation of the terms of the partnership, Executive Directors of the Partner Agency and the Community Services Agency will work to resolve the conflict(s).
    - If Executive Directors are unable to resolve conflict(s), the CSOC Advisory council will be called upon to suggest possible resolutions, which will be sent to the CSOC Leadership Council for approval. If the results in a ruling is termination then:

i. The Partner Agency will be notified in writing of the intent to terminate their participation in the Stanislaus County HMIS Project.
ii. The HMIS System Administrator will revoke the access of the Partner Agency staff.
iii. The HMIS System Administrator will keep all termination records on file with the associated Memorandum of Agreement.

6.2 User Authorization and Passwords

Policies
- Agency Staff participating in the Stanislaus County HMIS Project shall abide by the governing principles of the Stanislaus County HMIS Project and adhere to the terms and conditions of the *Stanislaus County HMIS Memorandum of Agreement* and the *User Policy, Responsibility Statement & Code of Ethics.* Partner Agencies must only request user access to HMIS for those staff members that require access to perform their job duties and have an end user license assigned to them.
- All users must have their own unique User ID and this **should never be shared with others.**
- Temporary, first time only, unique User ID and passwords will be communicated via the *Welcome to ClientTrack.NET*<sup>TM</sup> form to the New User.
- New User specified passwords should never be shared and should never be communicated in any format*.*
- New User ID's will require a password change on the first login.
- ClientTrack.NET<sup>TM</sup> requires the use of strong passwords as outlined below:
  - Must be between eight (8) and twelve (12) characters
  - Must have at least one (1) number
  - Must have at least one (1) special character (such as ! , . ( ) {} [ ] @ # $ % ^ & *)
  - Must contain at least one (1) capital letter
  - Cannot be any of the previous six (6) passwords you have used
- Passwords must be changed at least three (3) times per year; if not, the password will expire and the user will be locked out of the system.
- For Partner Agency Administrators, the passwords may only be reset by the HMIS System Administrator or HMIS Specialist.
- For Agency End Users **with** a Partner Agency Administrator, the Partner Agency Administrator should reset the passwords, but in some cases, the HMIS System Administrator or the HMIS Specialist may reset it. Partner Agency Administrators must notify the HMIS System Administrator or the HMIS Specialist of all passwords that have been reset.
- For Agency End Users **without** a Partner Agency Administrator, the passwords will be reset by the HMIS System Administrator or the HMIS Specialist.
- Three (3) consecutive unsuccessful attempts to login will disable the User ID until the account is reactivated by an Agency Administrator, HMIS System

Administrator or HMIS Specialist.

- Users must log into the system at least once every 30 days. The system will automatically deactivate users who do not log into the system within this period. To reactivate the account the user may be required to attend re-training.

Password Recovery

- The HMIS System Administrator or HMIS staff DO NOT have access to the End User's account passwords.
- In the event of a lost or forgotten password, the End User will use the password recovery option to reset their password. The system will ask the End User for their email address and the answer to their security question. As an extra layer of security, End Users may not choose where the password reset email is sent. Once the security question is answered correctly, an email will be sent only to the email address listed in the End User's account profile. If this account is no longer active, the End User must request assistance from the System Administrator or HMIS staff to reactivate their account. The request must be sent to the [HMIS@stancounty.com](mailto:HMIS@stancounty.com) email address. End Users will receive a temporary password reset via email. End Users will need to login and change their password immediately before gaining access to the Agency and Client data. Each request for a new password is logged in an audit trail.
- If an end User has reason to believe that someone else has gained access to their password, they must immediately notify the Partner Agency Administrator (if applicable) or the HMIS System Administrator who will review the End User login history and reset the password.

Procedures

- Workstation Security Assessment
  - Prior to requesting user access for any staff member, the Agency will conduct an operational security assessment of the user's workspace performed by the Partner Agency Security Officer.
  - They must confirm that the user workstation has virus protection and spyware properly installed and that the system scans automatically.
  - They must confirm that the user workstation has and uses a hardware or software firewall.
  - They must confirm that the user workstation itself has a password-protected log on.
  - They must confirm the user workstation has password-protected (aka locked) screensaver after five (5) minutes or more of inactivity.

- Request New User ID
  - When a Partner Agency identifies a staff member that requires access to Stanislaus County HMIS, they must complete a *User Account Request Form* and a *User Policy, Responsibility Statement & Code of Ethics.*
  - The Prospective User must read, understand and sign the *User Policy, Responsibility Statement & Code of Ethics* and return both to the HMIS System Administrator. The Prospective User must also read and

understand the *Stanislaus County Homeless Management Information System (HMIS) Policies and Procedures.*

- o The Partner Agency Director will co-sign and keep a copy of the *User Policy, Responsibility Statement & Code of Ethics,* and then send the original to the HMIS System Administrator.
- o The HMIS Specialist or HMIS System Administrator will create the New User ID as specified and once training is complete, notify the User ID owner of the temporary password via *Welcome to ClientTrack.NET*<sup>TM</sup> form.

- Change User Access
    - o When the Partner Agency determines that it is necessary to change a user's access they will complete a *User Account Request Form* and return it to the HMIS Specialist or HMIS System Administrator to update the User ID as needed.

- Rescind User Access
    - o Voluntary request:
        - When any HMIS user leaves the agency or otherwise becomes inactive the Partner Agency will complete the *User Account Request Form* and sent it to: HMIS@stancounty.com email address within 48 hours.

    - o Lack of Compliance:
        - If any HMIS user breaches the User Policy, violates the HMIS Policies and Procedures or breaches confidentiality or security, notify the HMIS System Administrator immediately
        - Upon notification, the HMIS System Administrator will deactivate the user's account.

- Remote System Access
    - o The Partner Agency and End Users must abide by the following Policies and Procedures and must ensure the security and confidentiality of Client data regardless of the computer used to log into the HMIS system. Remote access shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the Partner Agency Executive Director.
        - Remote laptops and desktops must meet the same security requirements as those of office HMIS workstations such as:
            - i. Virus protection and spyware properly installed and that the system scans automatically
            - ii. Workstation has and uses a hardware or software firewall
            - iii. Password protected log on for the workstation itself
            - iv. Password protected (aka locked) screensaver after five (5) minutes or more of inactivity
        - Remote access to ClientTrack<sup>TM</sup> should be limited to only those situations when it is imperative that the End User accesses the

system outside of normal office settings.

- All HMIS End Users are prohibited from using computers and/or workstations that are available to the public. In addition, accessing the ClientTrack™ from a public location through an internet connection that is not secured is prohibited. Examples of non-secured internet connections are internet cafes, libraries, airport Wi-Fi, etc.

- Participation Costs/Fees
  - All HMIS mandatory reporting entities participating in the Stanislaus County HMIS will be charged license/participation fees.
  - Additional licenses may be purchased at the current rate and subject to change.
  - Refer to the HMIS Fee Schedule for more information.

6.3    Collection and Entry of Client Data

Policies
- Client Data will be gathered according to the policies, procedures and confidentiality rules of each individual program.
- Partner Agency shall comply with the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA) 42 U.S.C. 13925. No identifiable information may be entered into HMIS for Clients in licensed domestic violence programs (Victim service Providers) or for Clients fleeing domestic violence situations.
- Partner Agency shall collect Client-identifiable information only when appropriate to the purposes for which the information is obtained or when required by law. An agency must collect Client information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.
- Information entered into HMIS by a Partner Agency will be truthful, accurate and complete to the best of the Partner Agency's knowledge.
- The Partner Agency will avoid any misrepresentations related to Client information in HMIS (including, without limitations, that the Partner Agency will ensure that its authorized agents and representatives will not purposefully enter inaccurate information on any records).
- The Partner Agency will exercise due diligence in its use of HMIS and will not take any action that results in the corruption of HMIS or the inappropriate release of Client information. The Partner Agency will expressly accept responsibility for any liability and/or other damages its misuse of HMIS may cause to the County or its Clients.
- Partner Agencies will not solicit from Clients or enter information about Clients into the HMIS database unless the information is required for a legitimate business purpose such as to provide services to the Client, to conduct evaluations or research, to administer the program or to comply with regulatory requirements.

- Partner Agencies will only enter information into the HMIS database with respect to individuals that it serves or intends to serve, including referrals.
- Client data may only be entered into HMIS with the Client's authorization.
- All Universal and Program Data elements from the HUD HMIS Data and Technical Standards Final Draft should be collected and is subject to the Client's consent.
- Client data will only be shared with Partner Agencies with the Client's consent and if there is a signed *Client Informed Consent and Release of Information* on record.
- Client data will be entered into HMIS in a timely manner. Partner Agencies will enter all data into HMIS for Street Outreach and Emergency Shelter Projects within 24 hours of contact with the Client and within 48 hours for Services Only, Transitional Housing, Rapid Re-housing, Permanent Supportive Housing, Coordinated Entry and Homelessness Prevention Projects.
- Service records should be entered on the day services began, but no later than 48 hours from the begin date.
- All Client data entered into HMIS will be kept as accurate and as current as possible.
- Hardcopy or electronic files will continue to be maintained according to individual program requirements and according to the HUD HMIS Data and Technical Standards.
- No data may be imported without the Client's consent.
- Any authorized data imports will be the responsibility of the participating Partner Agency.
- The Partner Agency is responsible for the accuracy, integrity and security of all data entered by its staff.

Procedures
- Refer to the *Stanislaus County Community System of Care Data Quality Management Plan (DQMP)* to provide actionable, measurable steps to address data quality within HMIS.
- Refer to the *Stanislaus County HMIS User Data Entry Manual* or User Handouts for Training Materials for specific data entry guidelines.

6.4     Release and Disclosure of Client Data

Policies
- Client-specific data from the HMIS system may be shared with Partner Agencies only when the sharing agency has secured a valid *Client Informed Consent and Release of Information* from the Client authorizing such sharing and only if the Release of Information is valid and has not expired. Other non-HMIS interagency agreements do not cover the sharing of Stanislaus County HMIS data.
- In obtaining Client consent, each adult Client in the household must sign the approved Release of Information form to indicate their consent to have their identifiable information into HMIS. If minors are present in the household, the head of household must consent by writing the names of the minors on the *Client Informed Consent and Release of Information* form.

- Sharing of Client data may be limited by program specific confidentiality rules.
- No Client-specific data will be released or shared outside of the Partner Agencies unless the Client gives written permission, or unless withholding that information would be illegal; please see the *Client Informed Consent and Release of Information* form. Services may NOT be denied if a Client refuses to sign the Release of Information or declines to state any information.
- Telephonic/verbal consent from the Client may temporarily substitute written consent provided that the written consent is obtained at the first time the Client is physically present at the Partner Agency. The Partner Agency must maintain appropriate documentation of the telephonic/verbal Client consent and all documentation must be provided to the Stanislaus County HMIS staff within 10 (10) days .
- If a Client does not agree to sign the *Client Informed Consent and Release of Information,* please review and obtain their signature on the *Client Denial of HMIS Consent* form. This form allows the Client to elect to release very limited personal information into the Stanislaus County HMIS database.
- A Client may withdraw or revoke consent for Client identifiable information collection by signing the *Client Revocation of HMIS Consent* form. If a Client withdraws/revokes their consent, the Partner Agency is responsible for immediately contacting the Stanislaus County HMIS Administrator to make appropriate data modifications in HMIS to ensure that the Client's personally identifiable information will not be shared with other Partner Agencies or visible to the Partner Agency's staff within the system. This information will remain in the Stanislaus County HMIS database as part of the non-identifying data collection.
- The Client's consent is in effect until the Client withdraws/revokes the consent in writing or 18 months from the date the consent was signed.
- Aggregate data that does not contain any Client specific identifiable data may be shared with internal and external agencies without specific permission. This policy should be made clear to Clients as part of the Client consent process.

No Conditioning of Services
- The Partner Agency will not condition any services upon or decline to provide any services to a Client based upon a Client's refusal to allow entry of identifiable information into HMIS, excluding VA SSVF programs.

Re-release Prohibited
- The Partner Agency agrees not to release any Client identifiable information received from HMIS to any other person or organization without written Client consent, or as required by law.
- Upon written request, a Client may request a report of data sharing events including dates, agencies, person, and other details. This request must be made available to the Client within ten (10) working days. Notify your HMIS System Administrator to process the request.
- A log of all external release or disclosures must be maintained for seven (7) years

and made available to the Client within ten (10) working days of the written request.

Client Inspection/Correction
- Upon written request, the Partner Agency will allow a Client to inspect and obtain a copy of his/her own personal information within ten (10) working days of the request with the exception of information compiled in reasonable anticipation of, or for use in, a civil, criminal or administrative action.
- The Partner Agency will also allow a Client to correct information that is inaccurate. Corrections may be made by way of a new entry that is in addition to, but not a replacement, of an older entry.

Retention of Paper Copies of Personally Identifiable Information
- For records stored within HMIS, HUD requires that data be retained for seven (7) years after the data was created or last changed as indicated in the 2004 HMIS Data & Technical Standards. Please note that the 7-year threshold is HUD's standard for HMIS. Other obligations such as federal, state, local or other contractual requirements may necessitate retention past the 7-year threshold.
- Partner Agencies must develop and adopt policies governing the retention of records containing personally identifiable information derived from HMIS. The policy must define how long paper records are retained after they are no longer actively utilized and the process that will be used to destroy paper records to prevent the release of personally identifiable information. The policy must also require the destruction of the paper records derived from HMIS no longer than seven (7) years after the last day the person was served by the organization.

Reporting Security Incidents
- A security incident is defined as the act of violating an explicit or implied security policy including, but not limited to:
  - Attempts (either failed or successful) to gain unauthorized access to a system or its data
  - Unauthorized access PPI due to misplaced, lost or otherwise compromised access
  - The unauthorized use of a system for the processing or storage of data
  - Unwanted disruption or denial of service(s)
  - Changes to system hardware, firmware or software characteristics without the owner's knowledge, instruction or consent
- If an End User notices or suspects a security breach, they must immediately notify the CHO's authorized representative, the CHO authorized representatives should report the incident to the Lead Agency's (currently CSA) HMIS Security Officer.
- The Partner Agency shall take appropriate action to address any incidents of unauthorized access to HMIS. This includes addressing and/or remedying the issue that resulted in the unauthorized access, notifying Stanislaus County HMIS immediately of the unauthorized access or breach in the Partner Agency's security that materially affects the County of that HMIS and be responsible for ensuring compliance by its officers, employees, agency staff and subcontractors

with the confidentiality provisions hereof.
- The Partner Agency will be responsible for complying with all applicable federal and state laws and regulations if there is a breach of confidential and/or legally protected County data to unauthorized third parties.
- The Partner Agency will be solely responsible for the costs associated with any and all activities and actions required resulting from the breach.

Procedures
- Procedures for disclosure of Client-specific data are readily obtained from the HMIS Policies and Procedures combined with the configuration of the Stanislaus County HMIS system, which facilitates appropriate data sharing.

6.5        Server Availability

Policies
- Data Systems International (ClientTrack.NET™) will strive to maintain continuous availability by design and by practice.
- Necessary and planned downtime will be scheduled when it will have the least impact and for the shortest amount of time and will only come after timely communication to all participating agencies.
- Data Systems International (ClientTrack.NET™) is responsible for design and implementation of a backup and recovery plan (including disaster recovery).

Procedures
- An End User should immediately report unplanned downtime to the HMIS System Administrator or HMIS Specialist.
- All other procedures for maximizing server availability, recovering form unplanned downtime, communicating and avoiding future downtime events are the responsibility of the System Administrator.
- Data Systems International (ClientTrack.NET™) is responsible for system backup, software and database data on a weekly basis, as well as incremental backups nightly.

6.6        Workstation Security

Policies
- Authorized Partner Agencies will provide their own computer and method of connecting to the internet and thus, to the Stanislaus County HMIS ClientTrack.NET™/Eccovia Solutions.
- Partner Agencies are responsible for preventing degradation of the system as a whole resulting from viruses, intrusion or other factors under the Partner Agency's control.
- Partner Agencies are responsible for preventing inadvertent releases of confidential Client-specific information. Such release may come from physical or electronic or visual access to the workstation therefore precautionary steps

should be taken to prevent inappropriate access (i.e. locking computer, being aware of those around a workstation, privacy screens for monitors, etc.).
- All workstations used in Stanislaus County HMIS must have the following:
  - Virus protection and spyware properly installed and that the system scans automatically
  - Workstation has and uses a hardware or software firewall
  - Password protected log on for the workstation itself
  - Password protected (aka locked) screensaver after five (5) minutes or more of inactivity
- Recommended Internet Connection:
  - DSL or Cable Modem, at least 128 KB encryption
- Recommended Browser to access ClientTrack.NET<sup>TM</sup> 15 is supported for End Users on the following:
  - Google Chrome 9.0 or above
  - Internet Explorer 9.0 or above
  - Firefox 9.0 or above
  - Microsoft Edge 9.0 or above
  - Mobile Safari for iOS 6.0 or above (used on iPhone, iPad and iPod mobile digital devices)
  - Firefox for Android (may be installed on Android 4.0 or above)
  - Use of the ClientTrack.NET<sup>TM</sup> Data Management Tools (Form Designer, Workflow Designer, etc.) requires Internet Explorer 9.0 and above or Google Chrome
  - Some internet browsers have the capacity to remember passwords so that the End User does not need to type in the password when return to the password-protected sites. This default should **NOT** be used with respect to Stanislaus County HMIS. The End User is expected to manually enter the password each time he/she logs into the system
- Recommended Computer Visual Display:
  - 1024 x 768 or higher as certain pages in ClientTrack.NET<sup>TM</sup> will not display properly in resolutions lesser than this
- Definition and communication of all procedures, achieving proper agency workstation configurations and protecting the access of all Partner Agency End Users system wide are the responsibility of the Partner Agency Executive Director.

Hardware/Software Requirements
- The Stanislaus County HMIS is a web-enabled software; all that is required to use the database is a computer/laptop, a valid username and password and the ability to connect to the internet via the above-mentioned recommended internet browsers. There are no additional hardware or software installations required.

Procedures
- At a minimum, any workstation accessing the Central Server shall have an anti-virus software present and active with current virus definitions and regularly schedule full-system scans occurring.

6.7        Training

Policies
- Partner Agency Executive Directors shall obtain the commitment of the HMIS System Administrator and designated staff persons to attend training(s) as specified in the *Stanislaus County HMIS Memorandum of Agreement (MOA)* between the Partner Agency and the Community Services Agency.

Procedures
- Start-up Training
  - The Community Services Agency (CSA) will provide training in the following areas prior to the Partner Agency using Stanislaus County HMIS:
    - Agency Administrator Training, if applicable
    - End User Training (including HMIS Policies and Procedures, Security and Sharing, Forms, Data Quality and Integrity, HMIS Features and Hand-on Data Entry)

- Agency Administrator Training
  - Training will be conducted in a group setting when it is possible to achieve the most efficient use of time and sharing of information between Partner Agencies. Training will include:
    - New User set-up
    - Assigning Agency within Stanislaus County HMIS hierarchy
    - End User training
    - Running package reports
    - Creating customized reports

- Follow-up Training
  - The Community Services Agency will provide follow-up training for each participating Partner Agency. Once the Partner Agency has "gone live," the HMIS System Administrator or HMIS Specialist will make on site visits as needed to ensure that the Partner Agency becomes proficient in the use of Stanislaus County HMIS.

- Ongoing Training
  - The Stanislaus County HMIS will provide mandatory, but not limited to, ongoing trainings in the following areas:
    - Data Standard Changes
    - System Performance Measures
    - Data Quality
    - Privacy and Security Training
    - Policies and Procedures Review
    - Demonstration of all and any new ClientTrack.NET™ software features
  - Ongoing training are available upon request and additional training classes will be scheduled as needed. Please refer to the HMIS section of the CSA

website: http://www.csastanislaus.com/hmis/index.html#_training or contact HMIS Administrator/Specialist for the latest schedule of classes and to sign up.

6.8     Compliance

Policies
- Compliance with these Policies and Procedures is mandatory for participation in the Stanislaus County HMIS system.
- By using the ClientTrack.NET<sup>TM</sup> software, all changes to Client data are recorded and will be randomly audited for compliance periodically.

Procedures
- Please see the Project Participation and the User Authorization sections for the appropriate procedures needed due to the lack of compliance.

6.9     Technical Support

Policies
- Technical support requests include problems with reporting, requests for enhancements or features or other general inquiries.
- End Users shall submit support request to their Partner Agency Administrator or to the HMIS System Administrator/Specialist via email to HMIS@stancounty.com.
- End Users shall **NOT** submit any requests to the software vendor under any circumstances.
- The Community Services Agency will only provide support for issues specific to the Stanislaus County HMIS software and systems.

Procedures
- Submission of Support Request
  - When End Users encounters an issue in the HMIS workflow, the End User will create a Support Request via the "Help" tab in HMIS. The End Users need to identify the issue, the severity of the problem, its impact on their ability to perform work, include the steps taken when the issue occurred and provide any documentation that may facilitate the resolution of the problem. Please note that the more information that is provided, the faster the issue may be resolved. End Users will provide contact information and the best times of contact should the HMIS staff have any questions.
  - HMIS staff shall make reasonable attempts to resolve the Support Request.
  - HMIS System Administrator may determine that the cause of the reported issue is outside of the scope of the Stanislaus County HMIS software and systems and may need to be escalated.
  - HMIS System Administrator will attempt to consolidate Support Requests from multiple Partner Agencies, if appropriate, and prioritize the issues

according to their severity and impact.

- o If the HMIS System Administrator is unable to resolve the issue, it will be escalated to other software or system vendor(s) for assistance.
- o All communication for Support Requests will be completed through HMIS.
- o In cases where the issue can be achieved by the End User or other Partner Agency personnel, the HMIS System Administrator will provide instructions via email to the Partner Agency HMIS Contact Person or Partner Agency Administrator.

6.10     Changes to Policies and Procedures and Other Documents

Policies
- The HMIS Governance Committee, CSCOC Advisory Council, the CSCOC Leadership Council of the Stanislaus County System of Care Collaborative and the Community Services Agency guide the compilation and amendment of the *Stanislaus County Community System of Care Collaborative HMIS Policies and Procedures.*

Procedures
- Changes to the Policies and Procedures
  - o Proposed changes may originate from any participant in the Stanislaus County HMIS.
  - o When proposed changes originate within a Partner Agency they must be reviewed and then submitted by the Partner Agency Executive Director to the Stanislaus County HMIS System Administrator for review and discussion.
  - o Stanislaus County HMIS System Administrator will maintain a list of proposed changes submitted.
  - o The list of proposed changes will be discussed by the CSOC Advisory Council and subject to line item excisions and modifications. This discussion may occur at a CSOC Advisory Council meeting via email or conference call and in accordance to the discretion and direction of the CSOC Advisory Council chairperson.
  - o Results of the discussion will be communicated and presented to the CSOC Leadership Council for approval along with the amended Policies and Procedures. The revised Policies and Procedures will be identified within the document by the date of the CSOC Advisory Council discussion.
  - o Partner Agency Executive Directors shall acknowledge the receipt and acceptance of the revised Policies and Procedures within ten (10) working days. Partner Agency Executive Directors will send their acknowledgement in writing or via email to the HMIS System Administrator. Partner Agency Executive Directors will also ensure the circulation of the revised document within their agency and comply with the revised Policies and Procedures.

# 7. OTHER OBLIGATIONS AND AGREEMENTS

7.1         HUD HMIS Data and Technical Standards

At a minimum, this document should reflect the baseline requirements listed in the *HMIS Data and Technical Standards Final Notice* published by HUD in July 2004. End Users of Stanislaus County HMIS are required to read and comply with the HMIS Data and Technical Standards. Failure to comply with these standards carries the same consequences as failure to comply with the HMIS Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the HMIS Standards from HUD, the HUD Standards take precedence. Should any inconsistencies be identified please notify the HMIS System Administrator at HMIS@stancounty.com.

7.2         Health Insurance Portability and Accountability Act (HIPAA)

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these Policies and Procedures.

7.3         Enforcements

The HMIS Lead will monitor data quality, meeting/training attendance and Partner Agency compliance at the user, project, and organization and system levels. Enforcements will depend on where the issues lie and may include the following:

- Disabling and/or removing access of specific providers or users of HMIS such as access to data, entering data or generating reports until there is a completion of remedial or additional training from the HMIS Lead and a demonstration of data quality proficiency.
- Restriction and/or withholding of funding from projects until data quality meets the minimum baseline thresholds identified in the *Stanislaus County Community System of Care Data Quality Management Plan (DQMP)* for the given project type.

# 8. CLIENT GRIEVANCES

Clients will contact the Partner Agency with which they have a grievance to obtain a resolution of any HMIS problems or complaints. The Partner Agency will send a written notice to the HMIS System Administrator of any HMIS related Client grievances and the Partner Agency's response to the grievance within 60 days of the receipt of the complaint/grievance. The HMIS System Administrator will keep a record of all grievances and report all grievances and their resolutions at the monthly Stanislaus Community System of Care Collaborative Leadership Council meeting. Partner Agency attendance at the CSOC Advisory Council meeting is optional. Partner Agencies may use the optional *Client HMIS Grievance Form.*

# 9. DOCUMENT CONTROL

All forms required by these procedures will be available from the HMIS staff. The forms are also available in PDF format on the CSA HMIS website at: http://www.csa-stanislaus.com/hmis/index.html .

The Community Services Agency HMIS staff will be responsible for the development, management and updating of all HMIS required documents and forms listed below with the exception of the *Privacy Notice for Covered Homeless Organizations*, which is created by each Partner Agency.

    9.1        Forms, Documents and Notices

*8.1.0.  Agency Access Application*
*8.1.1.  Client Denial of HMIS Consent*
*8.1.2.  Client HMIS Grievance Form (Agency use optional)*
*8.1.3.  Client Informed Consent and Release of Information*
*8.1.4.  Client Privacy Rights*
*8.1.5.  Client Revocation of HMIS Consent*
*8.1.6.  Consumer Notice (Version 1)*
*8.1.7.  Consumer Notice (Version 2)*
*8.1.8.  Mandatory Data Collection Notice*
*8.1.9.  Memorandum of Agreement (MOA)*
*8.1.10. Partner Agency List*
*8.1.11. Partner Agency Administrator Agreement*
*8.1.12. Privacy Notice for Covered Homeless Organizations (individual agencies)*
*8.1.13. Security & Data Quality Audit Checklist*
*8.1.14. Security Standards*
*8.1.15. User Account Request/Removal Form*
*8.1.16. User Policy, Responsibility Statement & Code of Ethics*
*8.1.17. Welcome to ClientTrack.NET<sup>TM</sup>*
*8.1.18. Stanislaus County Community System of Care Data Quality Management Plan (DQMP)*
*8.1.19. Stanislaus County Community System of Care HMIS User Data Entry Manual*
*8.1.20. Fee Schedule*

    9.2        HMIS Data, Entry/Update/Exit/Assessment "Paper" Forms

*8.2.1.  Stanislaus HMIS COC, ESG, Private Funded Intake Form for Persons Entering a Shelter*
*8.2.2.  Stanislaus HMIS COC, ESG, Private Funded Intake Form for Persons Entering Transitional Housing, Any Permanent Housing, Rapid Rehousing or Homeless Prevention*
*8.2.3.  Stanislaus HMIS Child Intake – All Programs*
*8.2.4.  Stanislaus HMIS PATH Program Intake*
*8.2.5.  Stanislaus HMIS RHY Program Intake*
*8.2.6.  Stanislaus HMIS VA SSVF Program Intake*
*8.2.7.  Stanislaus HMIS VA GPD Program Intake*