UTAH HOMELESS
MANAGEMENT
INFORMATION
SYSTEM

Standard Operating Policies & Procedures

DEPARTMENT OF WORKFORCE SERVICES

1385 South State Street, 4th Floor
Salt Lake City, UT 84115

September, 2014

SOP INFORMATION

VERSION UPDATES		
DATE OF UPDATE	**DATE OF APPROVAL**	**CHANGES MADE**
FEBRUARY 2009	8.24.2009	
AUGUST 2011	8.8.2011 (MTLAND) 8.18.2011 (SLC) 10.18.2011 (BOS)	UPDATED TO CLIENTTRACK SYSTEM, FORMS UPDATED
MAY 2013	07.17.2013 (STEERING COMMITTEE)	CONTACT INFORMATION; REPLACED APPENDICES H & I WITH NEW STEERING COMMITTEE BY-LAWS AND COC MOU; INCLUDED NEW POLICIES FOR TECHNICAL ASSISTANCE AND TRAINING, MONITORING AND COMPLIANCE, AND DATA ENTRY
DECEMBER 2013	DATE REVIEWED BY: STEERING COMMITTEE:__1/22/14___ DATE APPROVED BY COC EXECUTIVE COMMITTE: MTLAND:__1/2014_____ SLC:_____1/2014_____ BOS:_____1/2014_____	VERSION UPDATE SECTION REVISED; CONTACT INFORMATION; CHAPTER 4 MODIFIED TO INCLUDE DATA SECURITY PLAN, PRIVACY PLAN; CHAPTER 6 MODIFIED TO INCLUDE TRAINING DETAIL, AND END-USER ACTIVATION AND DE-ACTIVATION POLICY; CHAPTER 8 MODIFIED TO INCLUDE BEST PRACTICES DATA ENTRY PLAN, DATA QUALITY PLAN; REPLACED APPENDICES C AND J WITH UPDATED PRIVACY POSTING AND MONITORING TOOLS
SEPTEMBER 2014	DATE APPROVED BY STEERING COMMITTEE: 9/3/2014	UHMIS PRIVACY POLICY; UHMIS PRIVACY POSTING AND UHMIS INFORMED CONSENT RELEASE FORM

CONTACT INFORMATION

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UHMIS Website

http://utahhmis.org/

ClientTrack Training Website

http://www.clienttrack.net/uhmis_train/

ClientTrack Production Website

http://www.clienttrack.net/utahhmis

Contents

1. INTRODUCTION AND PROJECT OVERVIEW

This document is the Utah Homelessness Management Information System standard operating policies and procedures manual (SOP) which provides standard policies and procedures for Homeless Management Information System (HMIS) implementation for the agency managing the Utah HMIS (known as the UHMIS Lead or Lead Agency), Continua of Care and Contributing HMIS Organizations (CHOs). It also provides the framework for the ongoing operations of UHMIS. This introduction provides an overview of the main objectives, direction and benefits of UHMIS. In subsequent sections, this document addresses HMIS participation by CHOs, Client informed consent rights, data security policies, monitoring and compliance, training assistance, and data entry guidelines. This document also includes several forms employed in UHMIS implementation and use as appendices. Operating Procedures provide specific policies and steps necessary to control the operational environment and enforce compliance in:

- **Data Security**
- **Data Coverage**
- **Operational Compliance across multiple grant requirements**

In 2001, Congress delegated the U.S. Department of Housing and Urban Development (HUD) to lead communities to develop an unduplicated count of the homeless.

To meet this goal, HUD required federally funded public and nonprofit organizations to implement a homeless tracking system. Out of this directive came the Homeless Management Information System (HMIS), a computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance service agencies, and stores that data in a centralized database for analysis.

One explicit goal of developing HMIS is to gain a clearer understanding of the prevalence of homelessness and to track client service needs over time. We also aim to understand the complexities of needs of those who experience homelessness, and can better plan for a more responsive system of homeless service provision.

UHMIS is staffed at the State Community Services Office (SCSO) which is responsible for the administration and technical assistance of UHMIS software to the UHMIS CHOs and end-users.

Benefits of UHMIS

Described below are the overall benefits of the UHMIS, but not limited to:

- Streamline Reporting on all levels (Agency, Continuum, and State).
- Assist in the Coordination of Services and Programs within various communities.
- Ensure data quality and integrity.
- Meet compliance requirements of various funding sources.
- Provide outcome information of programs and services.

- Preparation of HUD required reports including agency-level Annual Performance Reports (APR), Annual Homelessness Assessment Report (AHAR), data compilation for the Notice of Funding Availability (NOFA), etc.1`

2. HMIS PARTICIPATION

In order to participate in UHMIS, all CHOs must provide an **Agency Partner Agreement** (Appendix A) and a Data Sharing Memorandum of Understanding (MOU) (Appendix B). In addition, participating CHO personnel must receive training by the lead agency and sign an **End-User Agreement** (Appendix C). Training by the lead agency is addressed in section five. Independent researchers or research agencies requesting access to UHMIS must provide a completed Research Access Agreement (Appendix D).

3. UHMIS PRIVACY POLICY AND DATA SHARING POLICY

This agency is part of the Utah Homeless Management Information System (UHMIS). UHMIS is a system that uses computers to collect information about homelessness. The reason for UHMIS is to track funding for homeless programs given by many funders. The goal is to simplify service delivery to people in need.

UHMIS operates over the internet and uses many security protections to keep client information safe. Many service providers across Utah use UHMIS, so client information will be shared with other service providers that provide similar services. This is done to provide services to clients in the best way possible.

Information collected is housed in a secure server located at Data System International (DSI), in Sandy, Utah. DSI employees have access to this server and the data housed there, but only for network support and maintenance purposes. UHMIS staff and approved Utah State Community Services Office (SCSO) staff collect and use only information that is needed for reports on homelessness to help inform policy decisions. Every person with access to this information must sign and comply with all confidentiality agreements.

Client consent is required for your information to be entered into HMIS. Utah HMIS has a tiered approach to client consent.

Tier I minimum standard: Emergency Shelters, Street Outreach and Coordinated Quick Assessment Projects:

- Projects must post the UHMIS privacy posting in an area easily accessible to clients. If the client is being served over the phone, the agency will read the statement to the client found in the UHMIS Privacy Posting.

Tier II minimum standard: All other projects

- Projects much post the UHMIS Privacy Posting and gather a signed UHMIS Informed Consent Release form from their clients. For clients participating in these programs this form must be gathered before their information is entered into UHMIS.

This tiered approach to gathering client consent is consistent with regulations set forth by HUD, please see: Federal Register/ Vol. 69, No. 146 / Friday, July 30, 2004 / Notices.

Clients may cancel their consent to share their information at any given time by written request to this agency. The cancellation will not be applied to records already collected from the client. If clients choose to not give consent, it does not make the client ineligible to receive services unless the client is applying for the Homeless Prevention and Rapid Re-housing Funding thru ESG, SSVF, TANF.

What Data Are We Sharing

Shared between and editable by all participating organizations:

- Client Intake record: Name, Birth date, Social Security Number, Gender, Race, Ethnicity
- Family and Contact Information: Family Name, Family Relationships, Family Address,
- Client Photo

Shared between all participating organizations:

- Program Enrollments: Case Name, Entry Date, Exit Date, Program Name, User Name, Program Type, Organization Name
- General Client assessment data: income, general health, education, etc.

Limited to the organization that created the record:

- Sensitive client data, such as: Case Notes, HIV/AIDS Barrier, Mental Illness, Domestic Violence assessment, alcohol abuse and substance abuse assessment

How We May Use and Disclose Client Information

We only collect information that is needed for 1) case management, 2) administrative, 3) billing and disclosures, 4) analytical, 5) other purposes as permitted by the client or required by law. We do not use or reveal client information

without client written consent, except in certain situations. These situations are when required by our funders or by law, or for specific administrative or research purposes. These specific purposes are outlined in our policy.

- **Case Management:** Agencies may use or give client information for case management purposes to help match services. Unless a client requests that his/her record remain hidden, personal identifiers will only be given to HMIS participating agencies. Agencies may only give client information with written client consent or other specific waiver.
- **Administrative Uses:** Agencies may use client information to carry out administrative functions internally including but not limited to report, checks, oversight, and management functions. Client information is stored on a central statewide database. Client information will be given for system administration purposes by the Lead Agency or contractors who administer the central database.
- **Billing Use:** Agencies my use client information for functions related to payment or reimbursement for services if required by the funder/billing agency.
- **Analytical Use:** Agencies may use client information for internal analysis including but not limited to evaluating program effectiveness, creating an unduplicated database on clients served within the system, understanding needs and trends in homelessness, and assessing Utah's Plan to End Homelessness. Information that could be used to identify the client will never be included in these reports.
- **Required by Law:** Agencies may give client personal information that meets the minimum standard necessary for the immediate purpose to comply with legal requirements. Agencies may only give client information to law enforcement entities in response to appropriate legal requests including subpoena or court order.
- **Other:** Agencies may give client information to an agency authorized by law to receive reports of abuse, neglect, or domestic violence if this agency believes the clients are the victim of such treatment on the circumstance that 1) the disclosure is required by law, 2) the client agrees to this disclosure, 3) this agency believes the disclosure is necessary to prevent serious harm. An agency may give client information if it believes it is necessary to prevent or lessen a serious or imminent threat to the health and safety of an individual or public, and if that information is given to a person reasonably able to prevent or reduce that threat.

Client records are maintained on the HMIS system for a period of seven years from its last modification date after which, personally identified information is removed and the remaining information is stored in a de-identified format. If clients have any questions about the use of their personal information or are concerned about client privacy or safety, they should share their questions or concerns with staff. If a client feels that the security or integrity of their information has been violated by an end-user or agency itself, CHOs are required to provide a client with a Grievance Filing Form (Appendix G) and submit it to the lead agency. The lead agency will investigate each grievance and submit suggested actions to the CHO within 30 days.

Clients that submit a grievance filing form will not be retaliated against for filing a complaint. You may also ask for a copy and/or an explanation of the privacy policy.

Client Rights

- Clients have the right to get services even if they choose **NOT** to participate in the UHMIS.
- Clients have the right to ask who has seen their information.
- Clients have the right to see their information and to change it if it's not correct. Clients must show documentation to do so.

A list of participating agencies is available from their case manager or online at http://hmis.utah.gov. If clients don't want their information shared with a specific agency, need to let their case manager or intake worker know. He/she can then take the proper action to honor their request.

Changes to This Policy

Changes to our privacy practices and the terms of this Policy may apply to all client information in HMIS. We reserve the right to change our privacy practices and the terms of this Policy at any time, including protected personal information created or received before we made the changes, provided such changes are permitted by applicable law. Before we make

a significant change in our privacy practices, we will change this Policy. A copy of the revised Policy will be posted at our location and on our website, and available upon request.

We are required by applicable federal and state law to maintain the privacy of clients' personal information. We are required to provide this Policy of our privacy practices, legal duties, and clients' rights concerning their protected personal information. We must follow the privacy practices that are described in this Policy while it is in effect. This Policy takes effect immediately, and will remain in effect until we replace it.

4. DATA SECURITY POLICIES AND PROCEDURES

In accordance with 2010 HUD data security guidelines, this section reviews the UHMIS Privacy Plan, including physical and technical safeguard, and data disposal policies. It also outlines the UHMIS Data Security Plan with guidelines for administrative responsibilities to protect data security, and reporting data security breaches. These policies are designed to secure Personal Protected Information (PPI) that allows identification of an individual directly or indirectly, can be manipulated by a reasonably foreseeable method to identify a specific individual, or can be linked with other available information to identify a specific individual.

4.A. Utah HMIS Privacy Plan

4.A.1   Physical Safeguards

a. The HMIS lead agency and CHOs will take all reasonable, foreseeable and protective actions to physically secure the PPI of clients. These actions are listed below but do not represent an exhaustive list of physical safeguards.
    i.   To secure protected personal information when transmitting written communication about clients, all users will use the ClientID to refer to the client.
    ii. Hard copies of client information or reports with protected personal information will be kept in a locked cabinet or storage area when unattended.
    iii. Loose papers or notes with client information not stored in the clients file will be securely destroyed.
    iv. The lead organization and CHOs will minimize the visibility of computer/tablet/phone screens used to limit HMIS access to unauthorized individuals.
    v.   Documents that contain passwords will be kept physically secure.
    vi. The servers that house UHMIS information will be kept in a secured and monitored facility.

4.A.2   Technical Safeguards

a. The HMIS lead agency and CHOs will take all reasonable, foreseeable and protective actions to technically secure the protected personal information of clients. These actions are listed below but do not represent an exhaustive list of technical safeguards.
    i.   Users will change their passwords at least once annually.
    ii. Terminals used to access HMIS will have locking screen savers and will be password protected.
    iii. Users will not leave UHMIS open and running when terminal is unattended.
    iv. Users will be automatically logged off after 30 or less minutes of inactivity.
    v.   Electronic Documents stored outside of a private protected local network that contain protected personal information must be password protected.
    vi. All computers accessing HMIS must have regularly updated anti-virus software installed that automatically scans files.

4.A.3   Data Disposal

a. The HMIS Lead will annually review PPI associated with clients for data no longer in use. Client records will be maintained on the HMIS system for a period of seven years from its last modification date after which, PPI will be removed and the remaining information shall be stored in a de-identified format.

4.B. Utah HMIS Security Plan

This section includes the UHMIS Security Plan implementation. Within twelve months of UHMIS SOP finalization by the Executive Committees of Utah's CoCs, all parts of the security plan will be completely implemented across all CHOs in each CoC by UHMIS. The following steps include administrative safeguards to be implemented by the lead agency and CHOs including the designation of security officers that participate in security monitoring for HUD security compliance.

4.B.1   Administrative Safeguards

There will be one lead security officer designated within the HMIS lead agency. The name and contact information of the current security officer at the lead agency can be found on the Utah HMIS website (http://hmis.utah.gov/). The lead security officer's responsibilities are as follows:

a. The lead security officer will provide an annual training and guidance to CHO security officers
b. At least twice a year the lead agency will offer a security specific training for users who need to recertify their annual security training
c. Work with the HMIS Steering Committee and CoC to develop and implement the security plan and review/update it annually
d. Keep a current list of the names and contact information for each CHO security officers
e. Be the primary contact for the CHO's security officer and work with them to resolve security issues
f. Ensure that CHOs are performing background checks on their security officers
g. Upon receipt of notification from a CHO to deactivate access for employee/volunteers that no longer need access, the lead HMIS security officer will ensure that the lead agency deactivates access within five business days.

There will be one security officer designated at each CHO. The responsibilities of this security officer are as follows :

a. Provide name and contact information to the lead HMIS security officer
b. Ensure that all other employees in the organization are current in their security training
c. At least once a year the CHO security officer will conduct a review of organization practices, policies and procedures to ensure that they are in compliance with the security plan.
d. Keep list of active users and notify HMIS when within two business days to deactivate access for employee/volunteers that no longer need access

Both the Lead and CHOs security officers are responsible for ensuring compliance with applicable security standards. CHOs will perform a background check on designated security officers and any administrative users.

Prior to being given access to HMIS all users must participate in a basic end user security training for certification in HMIS. The training will be provided by someone at the HMIS lead agency (unless authorization from Utah HMIS has been given for training to be offered within the organization) and will include information to safeguard privacy and improve data security. Contents of training is discussed in greater detail in section 6. Trainees will complete and return a copy of the UHMIS End User Agreement. The HMIS lead agency will offer the basic end user training on a regular basis and will make efforts to provide additional training as needed. All users of HMIS will need to participate in training addressing data privacy, security and data quality at least annually. The HMIS lead agency will offer annual security training at least twice a year.

4.B.2   Reporting Security Incidents

A security incident is defined as the act of violating an explicit or implied security policy including but not limited to:

a. Attempts (either failed or successful) to gain unauthorized access to a system or its data
b. Unauthorized access to PPI due to misplaced, lost, or otherwise compromised access
c. The unauthorized use of a system for the processing or storage of data
d. Unwanted disruption or denial of service

e. Changes to system hardware, firmware, or software characteristics without the owner's knowledge, instruction, or consent

If a user notices or suspects a security breach, they must immediately notify the CHO's security officer. CHO security officers should report incidents to the lead agency security officer in instances a through c above. In instances d and e, CHO security officers should conduct an internal investigation and, if needed then contact the HMIS lead security officer for further resolution. If the user and the CHO's security officer is the same person, then that person will contact the HMIS lead security officer in every case when they notice or suspect a security breach.

4.B.3   Disaster Recovery Plan

In conjunction with their contract with ClientTrack, the UHMIS lead agency will follow the disaster recovery plan provided by ViaWest. This plan is available on the internet: https://docs.google.com/a/utah.gov/file/d/0B8h2IWCp2iVULXJpRE81V3Jqalk/edit.

4.B.4   Contracts and Other Arrangements

The HMIS Lead must retain copies of all contracts and agreements executed as part of the administration and management of HMIS. As indicated above, CHOs that wish to share client information with other agencies to better facilitate program management must have a **Data Sharing MOU** (Appendix B) in place before the UHMIS team grants access to information outside of the originating agency.

5. MONITORING AND COMPLIANCE

In conjunction with the Data Security Plan outlined in section four, this section delineates the duties of security officers from the lead agency and CHOs. All programs participating in the Utah HMIS will be monitored annually for data security and data security best practices according to guidance set forth by 2010 HUD data security guidelines using the Utah HMIS **Security Checklist** (see Appendix H). Monitoring will be conducted by Utah HMIS, CoC approved staff or related local or state monitors requiring HMIS data compliance. UHMIS staff will visit all participating agencies across Utah at least once annually. The purpose of the visit is to monitor data security practices and to discuss any changes to the program or staff. Utah HMIS will also collect feedback to improve the HMIS Lead Agency.

5.A. Annual Security Review

5.A.1   At least annually the HMIS lead security officer and the CHO security officers will conduct a security review. This process will include the completion of the **UHMIS Security Checklist** (Appendix H) for each CHO.

5.A.2   CHO's security officer responsibilities include:
a. Review and complete the UHMIS Security Checklist during the second quarter of each year during UHMIS participation.
b. Submit the completed UHMIS Security Check list to the HMIS lead security officer.
c. Develop plans with the lead security officer to improve or correct issues that were found using the UHMIS Security Checklist.

5.A.3   UHMIS lead security officer security responsibilities include:
a. Complete the UHMIS Security Checklist during the second quarter of each year.
b. Review the completed and submitted UHMIS Security Checklists from CHOs.
c. Make a plan with CHO security officers to improve or correct issues found using the UHMIS Security Checklist.

6. TRAINING AND TECHNICAL ASSISTANCE

Utah HMIS will offer regular training from their offices and offer the ability to conference into training for remote trainees. Onsite training will be offered at three certification levels: new users, administrators, and program directors. The content of trainings is outlined below including the content of the training, attendees, skills, and schedules for the different certification levels.

6.A. Training for End Users

6.A.1. Content of the training
   a. UHMIS website
   b. Privacy of information and data security
   c. Data quality
   d. ClientTrack basics
      i. Enrollment
      ii. Recording a service
      iii. During program enrollment assessments (annual assessment)
      iv. Exiting Clients
      v. Submitting an issue

6.A.2. Who is required to attend
   a. Any one person who needs a UHMIS user account

6.A.3. Tasks new users must complete in the UHMIS training environment before being given access to the UHMIS
   a. Attend the UHMIS end user training
   b. Enroll two fictitious individuals and one fictitious family in programs in the training website
   c. Record services for these people
   d. If set up in the UHMIS: HUD Competitive workgroup they need to perform during program enrollment assessment
   e. Exit these individuals
   f. Return a signed (by both the individual and the agency director) copy of the "UHMIS Ender User Agreement" to the UHMIS staff

6.A.4. Schedule
   a. For new agencies/new programs
   b. Whenever possible UHMIS staff will offer to provide onsite training to new agencies. If this is not an option they will set up a time separate from other end user trainings to train the individuals at the new agencies.
   c. Regularly scheduled trainings
      i. UHMIS will offer end-user training at least twice a month
      ii. These will typically take place on the second and third week of every month
      iii. In most instances these will be held in the UHMIS office building but will be made available via conference call and over the internet for those users that cannot make it to the office.
      iv. If the regularly scheduled trainings do not meet the needs of an agency UHMIS will work with them to set a training with them.

6.B. Training for Reporting

6.B.1. Content of the training

a. Privacy of information and data security
b. Data quality
c. Canned Reports
    i. Using filters
    ii. Data export options
d. The APR
    i. Auditing data connected to performance measures
e. Data Explorer Basic
f. Data clouds
    i. Linking clouds
    ii. Using filters

6.B.2. Who is required to attend
a. Anyone who will be pulling and reporting UHMIS data

6.B.3. Schedule
a. Report training will be offered the last week of a month. In most instances these will be held in the UHMIS office building but will be made available via conference call and over the internet for those users that cannot make it to the office.
b. If the regularly scheduled trainings do not meet the needs of an agency, UHMIS will work with them to set a training with them.

6.B.4. Annual privacy or information, data security and data quality review
a. Content
    i. Privacy of information and data security
    ii. Data quality
b. Who is required to attend
    i. All UHMIS users at least once a year
c. Schedule
    i. These trainings will take place twice a year in the first and third quarter. There will be at least two sessions each time it is offered to give flexibility to those that need to attend. In most instances these will be held in the UHMIS office building but will be made remotely available via conference call and over the internet. If the regularly scheduled trainings do not meet the needs of an agency UHMIS will work with them to set trainings with them.

6.C. Training for Program Directors

6.C.1. Content of the training
a. Privacy of information and data security
b. Data quality
c. Canned Reports
    i. Using filters
    ii. Exporting option
    iii. Using the export to excel data
d. The APR
    i. Auditing data connected to performance measures
e. Data Explorer Basic

        f.   Data clouds
             i.   Linking clouds
            ii.   Using filters

6.C.2.   **Who is required to attend**

    a.   Program directors who will be pulling and reporting UHMIS data

6.C.3.   **Schedule**

    a.   UHMIS will regularly offer data analysis and report training the last week of the month. In most instances these will be held in the UHMIS office building but will be made available via conference call and over the internet for those users that cannot make it to the office.

    b.   If the regularly scheduled trainings do not meet the needs of an agency UHMIS will work with them to set a training with them.

6.D. Annual Privacy and Data Security Review

6.D.1.   **Content**

    a.   Privacy of information and data security

    b.   Data quality

6.D.2.   **Who is required to attend**

    a.   All UHMIS users at least once a year

6.D.3.   **Schedule**

    a.   These trainings will take place twice a year about six months apart. There will be at least two sessions each time it is offered to give flexibility to those that need to attend. In most instances these will be held in the UHMIS office building but will be made available via conference call and over the internet for those users that cannot make it to the office. If the regularly scheduled trainings do not meet the needs of an agency UHMIS will work with them to set a training with them.

6.E. Other Training

6.E.1.   **End User Groups**

    a.   These trainings will be led by End User leads with support from the UHMIS staff.
        i.   End user leads are prominent UHMIS end users that come from CHOs from across the state acting in the capacity of proficient HMIS end users.
        ii.   The End User lead is a volunteer position.

    b.   Content of the training
        i.   The content of the training will be set by the End User leads and can vary from meeting to meeting, but will be will relevant to data quality, data definitions, software use, case management issues, or other HMIS topics

    c.   Who is required to attend
        i.   All end users from any agency are encouraged to attend

    d.   Schedule
        i.   These trainings will take place quarterly as determined by End User leads.

UHMIS will work with the UHMIS Steering Committee, CHOs, UHMIS lead user groups and UHMIS end users to provide any other training as needed.

6.F. Technical Assistance

All issues and questions are required to be submitted through the Help feature in ClientTrack. The Help feature in ClientTrack records vital information to help resolve issues including: workgroup, screen, client information and report parameters. If the issue question requires an answer within three hours, users may call any Utah HMIS team member.

All issues will be addressed within five business days, questions will be answered within three business days and suggestions will be reviewed by the Utah HMIS team. Depending on the complexity of the issue and/or question it might take longer to resolve the issue.

6.G. HMIS End User Registration

End Users will be registered into HMIS after the designated training for End-Users protocols have been met. End-Users who have not entered the HMIS system for 90 days or more will be designated as "Inactive" and will automatically have their HMIS account deactivated, including the deactivation of a working password.

6.H. HMIS End User Inactivation

Monthly end user reports will be generated by UHMIS team members using the Organization User List report under the User & Administration Reports folder in HMIS and distributed to CoC leadership. Those agencies with personnel designated with "Inactive" status will be contacted by the lead agency for verification. Written notification of inactive users from the agency will be included the HMIS agency files. CHOs will notify the Utah HMIS team of any personnel whose employment has been terminated in order to deactivate that employee's HMIS access. The lead agency will deactivate access within five business days.

7. DATA ENTRY POLICIES AND PROCEDURES

All agencies shall consistently enter or upload information into the UHMIS database with five working days of seeing the client. This is to ensure that accurate and timely data is being reported to Local, State, and Federal government entities. Data should be entered or uploaded within 24 hours where possible (see also the Agency Partner Agreement in Appendix A). All agencies should develop a client record verification/audit procedure and regular times (at least quarterly) for verifying HMIS data.

7.A. Utah HMIS Best Practices Data Entry Plan

7.A.1   Agencies need to have timely and correct data within Utah HMIS. The following section describes best practices data entry policy for each program type. **All agencies need to have quarterly data entered and corrected by the HMIS Data Pull date.** All Programs need to have a client record verification/audit procedure and timeframe for verifying HMIS data at least quarterly.

7.A.2   Timely data entry is explained for Permanent Supportive Housing Programs

a.   Entry enrollment data will be entered into Utah HMIS within five business days of enrollment.

b.   Assessment will be entered into Utah HMIS within five business days of contact(s) with the client(s).

c.   Exit enrollment will be entered into Utah HMIS within five business days of client exit out of the program. If client disappears or an agency has no contact with the client and program policy has determined that the client has left the program, the exit must be done within five business days of determining that the client(s) has exited the program.

d.   Data Correction

  i.   Backdate entry, assessment and exit enrollments within five business days.

  ii. Deletion must be submitted to the Utah HMIS within 30 days of the record date.

  iii. Correcting information must be completed quarterly within the program.

7.A.3   Timely data entry is explained for <u>Transitional Housing Programs</u>

a.   Entry enrollment data will be entered into Utah HMIS within five business days of enrollment.

b.   Assessment will be entered into Utah HMIS within five business days of contact(s) with the client(s).

c.   Exit enrollment will be entered into Utah HMIS within five business days of client exit out of the program. If client disappears or an agency has no contact with the client and program policy has determined that the client has left the program, the exit must be done within five business days of determining that the client(s) has exited the program.

d.   Data Correction

  i.   Backdate entry, assessment and exit enrollments within five business days.

  ii. Deletion must be submitted to the Utah HMIS within 30 days of the record date.

  iii. Correcting information must be completed within 30 days after the end of the current quarter.

7.A.4.   Timely data entry is explained for <u>Emergency Shelter Programs</u>

a.   Entry enrollment data will be entered into Utah HMIS within ten business days of enrollment.

b.   Assessment will be entered into Utah HMIS within ten business days of contact(s) with the client(s).

c.   Exit enrollment will be entered into Utah HMIS within ten business days of client exit out of the program. If client disappears or an agency has no contact with the client and program policy has determined that the client has left the program, the exit must be done within five business days of determining that the client(s) has exited the program.

d.   Data Correction

  i.   Backdate entry, assessment and exit enrollments within ten business days.

  ii. Deletion must be submitted to the Utah HMIS within 30 days of the record date.

  iii. Correcting information must be completed within 30 days after the end of the current quarter.

7.A.5.   Timely data entry is explained for <u>Rapid-Rehousing and Homeless Prevention programs</u>

a.   Entry enrollment data will be entered into Utah HMIS within five business days of enrollment.

b.   Assessment will be entered into Utah HMIS within five business days of contact(s) with the client(s).

c.   Exit enrollment will be entered into Utah HMIS within five business days of client exit out of the program. If client disappears or an agency has no contact with the client and program policy has determined that the client has left the program, the exit must be done within five business days of determining that the client(s) has exited the program.

d.   Data Correction

  i.   Backdate entry, assessment and exit enrollments within five business days.

  ii. Deletion must be submitted to the Utah HMIS within 30 days of the record date.

  iii. Correcting information must be completed within 30 days after the end of the current quarter.

7.A.6. Timely data entry is explained for <u>Outreach and Services only programs</u>

    a. Entry enrollment data will be entered into Utah HMIS within five business days of enrollment.

    b. Assessment will be entered into Utah HMIS within ten business days of contact(s) with the client(s).

    c. Exit enrollment will be entered into Utah HMIS within ten business days of client exit out of the program. If client disappears or an agency has no contact with the client and program policy has determined that the client has left the program, the exit must be done within five business days of determining that the client(s) has exited the program.

    d. Data Correction

        i. Backdate entry, assessment and exit enrollments within ten business days.

        ii. Deletion must be submitted to the Utah HMIS within 30 days of the record date.

        iii. Correcting information must be completed within 30 days after the end of the current quarter.

7.B. Quarterly Data Quality Reports

7.B.1. Data Quality Reporting Schedule

Utah HMIS will pull quarterly performance measurements on each program in CHOs. Quarterly data quality reports will be submitted by the lead agency with items identified for improvement to the CoC Steering Committee and each grantee according to the schedule below. Actions to improve data quality required by HUD guidelines will be suggested by the CoC and aided by the HMIS agency.

Quarterly Point In Time Data Collection Date	Reporting Time Period	HMIS Data Pull Date	HMIS reporting to grantees
July (last Wednesday)	May-July	August (first Wednesday)	September
October (last Wednesday)	August – October	November (first Wednesday)	December
January (last Wednesday)	November- January	February (first Wednesday)	March
April (last Wednesday	February – April	May (first Wednesday)	June

Utah HMIS will provide each agency and grantee instructions on what reports are being pulled and how the data is compiled and analyzed at start of each contract.

7.B.2 Discrepancies in Data

If at the time of quarterly reporting, agency program information is reported incorrectly the agency will submit a letter of explanation to the grantee(s) and Utah HMIS. Utah HMIS will not re-run the quarterly performance measurement reports, the report will stand as is. The CHO letter will be attached to the report.

7.B.3. Request of Deletion Past the Program Policy

Starting January 2014, CHOs needing information deleted from a client record that is past the program policy date must submit an explanation letter to the Utah HMIS explaining why the agency was unable to follow the program policy. The lead agency will submit the CHO letter to the Utah HMIS Steering Committee who will be notified of the request for deletion. The agency letter will be put into the Agency file at the lead HMIS agency.

7.C. Utah HMIS Data Quality Plan

Utah HMIS collects a variety of data elements that change over time during a client's homelessness. This document reviews Utah HMIS policies for Data Quality.

Data quality of Universal Data will be assessed quarterly among all Utah Continua. Data quality reports assess frequency of missing data, "Don't Know," and "Refused" responses by agency across each homelessness program type.

Universal and Program Data Standards

Data Element	Utah CoC Standards for data on all clients	HUD Standards for Missing Data (includes "Don't Know" or "Refused")
Universal Data		
Name[1]	100%	0%
Social Security Number (SSN)[1]	100%	5% or less
Date of Birth (DOB)[1]	100%	1% or less
Gender[1]	100%	1% or less
Race[1]	98%	5% or less
Ethnicity[1]	100%	1% or less
Disabling Condition	98%	5% or less
Veteran Status	98%	5% or less
Residence Prior to Program Entry	95%	10% or less
Zip Code of Last Permanent Address	95%	10% or less
Length of Stay in prior residence	95%	10% or less
Homelessness Status	100%	1% or less
Program Entry Date	100%	1% or less
Program Exit Date	100%	1% or less
Program Data		
Income and Sources	100%	5% or less
Non-Cash benefits	100%	5% or less
Physical Disability	98%	5% or less
Developmental Disability	98%	5% or less

Chronic Health Condition	98%	5% or less
Mental Health	98%	5% or less
Substance Abuse	98%	5% or less
Domestic Violence	90%	15% or less
Destination	95%	10% or less
Reason for leaving	95%	10% or less
[1] One or more of these personal identifiers may need to be collected on subsequent visits to retrieve the client record, though this information needs only to be recorded on initial program entry		

Corrections in ClientTrack should only be done when information in the system is incorrect. A new assessment should be done when information is updated. This document indicates data element quality standards as set by HUD. Data quality reporting will follow the schedule set forth in section 7.B.1.

8. UHMIS GOVERNANCE

The general structure, roles, and responsibilities of the invested parties and/or entities of the UHMIS lead agency are designated in Appendix I: Utah HMIS and CoC MOU. By-laws of the HMIS Steering Committee are outlined in Appendix J.

9. GLOSSARY OF TERMS AND USEFUL ACRONYMS

A	B	C	D	E	F	G	H	I	J	K	L	M
N	O	P	Q	R	S	T	U	V	W	X	Y	Z

A

Annual Homeless Assessment Report (AHAR): HUD's annual report to Congress on the nature and extent of homelessness nationwide. The report details yearly homelessness counts, demographics, trends, and service usage; reports are compared and contrasted to data collected for previous years, helping to determine if homelessness is increasing or decreasing.

Annual Performance Report (APR): The APR is a performance based report that HUD uses to track program progress and accomplishments of HUD homeless assistance programs on an annual basis. The majority of this report is pulled from the UHMIS system and then reported to HUD in the HDX system. This report was formerly known as the Annual Progress Report.

B

Bed Utilization: An indicator of whether shelter beds are occupied on a particular night or over a period of time.

C

Contributory HMIS Organization (CHO): An organization that operates a contributory homeless assistance program or homelessness prevention program or contributory non-homeless assistance program.

Chronically Homeless Individual: An unaccompanied homeless adult individual (persons 18 years or older) with a disabling condition (see definition below) who has either been continuously homeless for a year or more OR has had at least four (4) separate occasions of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter/Safe Haven during that time. Persons under the age of 18 are not counted as chronically homeless. For purposes of the PIT, persons living in transitional housing at the time of the PIT count should not be included in this subpopulation category.

Chronically Homeless Family: A household with at least one adult member (persons 18 or older) who has a disabling condition (see definition below) and who has either been continuously homeless for a year or more OR has had at least four (4) separate occasions of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter/Safe Haven during that time. The subpopulation count should include all members of the household. For purposes of the PIT, persons living in transitional housing at the time of the PIT count should not be included in this subpopulation category.

Client: A living individual about whom a Contributory HMIS Organization (CHO) collects or maintains protected personal information: (1) because the individual is receiving, has received, may receive, or has inquired about services from a CHO; or (2) in order to identify service needs, or to plan or develop appropriate services within the CoC.

Community Development Block Grant (CDBG): Federal HUD formula grant program providing communities with resources to address a variety of community development needs. CDBG is awarded to entitlement communities to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services.

Consolidated Plan: A long-term housing and community development plan developed by state and local governments and approved by HUD (24 CFR Part 91). The Consolidated Plan contains information on homeless populations and should be coordinated with the CoC plan.

Continuum of Care (CoC): The primary decision making entity defined in the funding application to HUD as the official body representing a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency. Utah has three CoCs: Salt Lake, Mountainland and Balance of State. The Salt Lake continuum consists of the Salt Lake and Tooele Counties. The Mountainland continuum consists of Utah, Summit, and Wasatch counties. The Balance of State continuum consists of all other counties no contained in the other two continua.

D

Data Recipient: A person who obtains PPI from an HMIS Lead Agency or from a CHO for research or other purposes not directly related to the operation of the HMIS, CoC, HMIS Lead Agency, or CHO.

Disabling Condition: Any one of (1) a disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes an individual's ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions; (3) a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; (4) the disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; or (5) a diagnosable substance abuse disorder.

E

Emergency Shelter (ES): A homeless program that is intended to provide short term support and emergency housing to homeless individuals. Individuals you are in sating in an emergency shelter as still considered literally homeless. Emergency shelter may take to from of a congregate shelter, motel vouchers, or a domestic violence shelter.

Emergency Solutions Grant (ESG): ESG is a federal grant that is given to eligible states, cities, counties and territories. The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless.

End User (or User): An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data in the HMIS or another administrative database from which data are periodically uploaded to the HMIS.

F

G

H

Hashing: The process of producing hashed values for accessing data or for security. A hashed value is a number or series of numbers generated from input data. The hash is generated by a formula in such a way that it is extremely unlikely that some other text will produce the same hash value or that data can be converted back to the original text. Hashing is often used to check whether two texts are identical. For the purposes of Homeless Management Information Systems it can be used to compare whether client records contain the same information without identifying the clients.

Health Insurance Portability and Accountability Act of 1996 (HIPAA): U.S. law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals, and other health care providers. Developed by the Department of Health and Human Services, these standards provide patients access to their medical records and give them more control over how their personal health information is used and disclosed.

HMIS Lead Agency: An organization designated by a CoC to operate the CoCs HMIS on its behalf.

HMIS Participating Bed: For any residential homeless program, a bed is considered a "participating HMIS bed" if the program makes a reasonable effort to record all universal data elements on all clients served in that bed and discloses that information through agreed upon means to the HMIS Lead Agency at least once annually.

HMIS Software Solution Provider: An organization that sells, licenses, donates, builds or otherwise supplies the HMIS user interface, application functionality and database. The HMIS software solution that has been chosen to serve all three of Utah CoC is ClientTrack.

HMIS Vendor: A contractor who is paid to provide services for the operation of a CoC's HMIS. An HMIS vendor includes an HMIS software solution provider, web server host, and data warehouse provider, as well as a provider of other contracted information technology or support.

Homeless Management Information System (HMIS): The information system designated by the CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

Homelessness Prevention and Rapid Re-Housing Program (HPRP): A program designed to assist households who would otherwise become homeless, and to quickly help re-house those who are homeless.

Housing Inventory Chart (HIC): The HIC is a point-in-time inventory of provider programs within your Continuum of Care that provide beds and units dedicated to serve persons who are homeless. It should reflect the number of beds and units available on the night designated for the count that are dedicated to serve persons who are homeless, per the HUD homeless definition.

Housing Opportunities for Persons with AIDS (HOPWA): The only Federal program dedicated to the housing needs of people living with HIV/AIDS. Under the HOPWA program, HUD makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons medically diagnosed with HIV/AIDS.

Housing and Urban Development (HUD): A Federal organization aiming to increase homeownership, support community development and increase access to affordable housing free from discrimination.

I
Informed Consent: A client is informed of options of participating in an HMIS system and then specifically asked to consent. The individual needs to be of age and in possession of all of his faculties (for example, not mentally ill), and his/her judgment not impaired at the time of consenting (by sleep, illness, intoxication, alcohol, drugs or other health problems, etc.).

J

K

L

M

McKinney-Vento Act: The McKinney-Vento Homeless Assistance Act was signed into law by President Ronald Reagan on July 22, 1987. The McKinney-Vento Act funds numerous programs providing a range of services to homeless people, including the Continuum of Care programs: the Supportive Housing Program, the Shelter Plus Care Program, and the Single Room Occupancy Program, as well as the Emergency Shelter Grant Program.

N

Neighborhood Stabilization Program (NSP): This program was established for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. NSP targets low and moderate income persons under 120% of area median income. Eligible activities include costs related to purchase and redevelopment of foreclosed and abandoned homes and residential properties. NSP grantees must use at least 25 percent of the funds appropriated for the purchase and redevelopment of abandoned or foreclosed homes or residential properties that will be used to house individuals or families whose incomes do not exceed 50 percent of the area median income.

Notice of Funding Availability (NOFA): includes important information on program priorities, general requirements, funding levels, and contacts for each program.

Non-Contributory CoC Program: A CoC Program that does not contribute PPI or other client-level data to an HMIS.

O

P

Participating CoC Program: A Contributory CoC Program that makes reasonable efforts to record all the universal data elements and all other required data elements as determined by HUD funding requirements on all clients served and discloses these data elements through agreed upon means to the HMIS Lead Agency at least once annually.

Performance Measures – A process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.

Permanent Supportive Housing (PSH): – Long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables the special needs populations to live independently as possible in a permanent setting. Permanent housing can be provided in one structure or in several structures at one site or in multiple structures at scattered sites.

Point in Time (PIT): – A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.

Protected Personal Information (PPI): Information about a client: (1) whose identity is apparent from the information or can reasonably be ascertained from the information; or (2) whose identity can, taking into account any methods reasonably likely to be used, be learned by linking the information with other available information or by otherwise manipulating the information.

Processing: An operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the PPI.

Q

Quarterly Performance Reports (QPR): A reporting tool that HUD uses to track progress and accomplishments of HPRP funded programs on a quarterly basis. This report affects HPRP funding.

R

Rapid Re-Housing: Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. Eligible costs also include utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

S

Safe Haven: A Safe Haven is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness and other debilitating behavioral conditions that are on the street and have been unable or unwilling to participate in housing or supportive services. A Safe Haven project that has the characteristics of permanent supportive housing and requires clients to sign a lease may also be classified as permanent housing when applying for HUD funds. It is expected that clients will be reengaged with treatment services as they become stabilized and learn to trust service providers.

Shelter Plus (S+C): A program that provides grants for rental assistance for homeless persons with disabilities through four component programs: Tenant, Sponsor, Project, and Single Room Occupancy (SRO) Rental Assistance.

Street Outreach: Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, and transportation.

Supportive Services Only Program: Supportive Services Only (SSO) projects address the service needs of homeless persons. Projects are classified as this component only if the project sponsor is not also providing housing to the same persons receiving the services. SSO projects may be in a structure or operated independently of a structure, such as street outreach or mobile vans for health care.

T

Temporary Assistance for Needy Families (TANF): Money set aside to give assistance to families in danger of becoming homeless. This money can be used for such things as back rental or utility payments, deposits, rent and utilities. This money is specific for preventing homelessness.

Transitional Housing (TH): The transitional housing component facilitates the movement of homeless individuals and families to permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive supportive services such as childcare, job training, and home furnishings that help them live more independently.

U

Unaccompanied Youth: Minors not in the physical custody of a parent or guardian, including those living in inadequate housing such as shelters, cars, or on the streets. Also includes those who have been denied housing by their families and school-age unwed mothers who have no housing of their own.

Unduplicated Accounting of Homelessness: An unduplicated accounting of homelessness includes measuring the extent and nature of homelessness (including an unduplicated count of homeless persons), utilization of homelessness programs over time, and the effectiveness of homelessness programs.

Unduplicated Count of Homeless Persons: The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.

Universal Data Element (UDE): Data required to be collected from all clients serviced by homeless assistance programs using an HMIS. These data elements include date of birth, gender, race, ethnicity, veteran`s status, and Social Security Number (SSN). These elements are needed for CoCs to understand the basic dynamics of homelessness in their community and for HUD to meet the Congressional directive to support AHAR.

V

Victim Service Provider: A nonprofit or non-governmental organization including rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

W

Written Consent: Written consent embodies the element of informed consent in a written form. A client completes and signs a document consenting to an understanding of the options and risks of participating or sharing data in an HMIS system. The signed document is then kept on file at the agency.

X

Y

Z

10. HMIS JOB DESCRIPTIONS

10.A HMIS Director

1. Assist Lead Agency in the planning, coordination and management of the HMIS in the following three Task areas:

    a. Planning, scheduling and meeting project objectives as outlined by the Agency Executive Director and CoC Steering Committee including issues related to funding, budgeting, grant writing and project reporting.

    b. Determining guiding principles for implementation and administration of the HMIS.

    c. Identifying and orienting Partner Agencies as participants in the HMIS.

    d. Selecting minimum data requirements, defining criteria, standards and parameters for the release of aggregate data.

    e. Ensuring adequate privacy protection provisions in project implementation and administration.

    f. Planning and oversight of relevant technical infrastructure and services to implement and administer the HMIS.

2. Assume primary responsibilities for daily operations of the HMIS, including:

    a. Managing contractual agreements between the three Utah CoC and Partner Agencies participating in the HMIS.

    b. Providing technical assistance to three Utah CoC and Partner Agencies in the use of the HMIS, including on-site training and support.

    c. Developing training procedures and materials to support use of the HMIS.

    d. Monitoring technical aspects of system functioning, speed, and database back-up procedures of the HMIS.

    e. Auditing access to and use of the HMIS to ensure full participation and compliance by Partner Agencies authorized to use the system.

    f. Providing technical assistance to ensure that all Partner Agencies using the HMIS adhere to the governing principles related to its use.

    g. Developing standard reports and queries on HMIS usage and data for interested parties.

    h. Developing strategies to ensure that Resource information contained in the HMIS is expanded and updated regularly.

    i. Monitoring issues related to contractual performance of the HMIS software vendor pertaining to software development, system upgrades, hosting and data protection services.

3. Development and Management of Resources for Implementation, Operation and/or Expansion of the HMIS, including:

    a. Researching, interpreting and preparation of information for grant applications and other funding sources as needed.

    b. Determination of cost estimates and budgets. Submittal of grant applications and funding proposals.

    c. Coordination of applications and/or proposals with Agency and representatives of other public and private agencies.

    d. Management of activities to ensure compliance with funding requirements, regulations, and policies.

10.B System Administrator

1. Act as the fiduciary for the local Emergency Services Grant.

2. Contracts with software vendor for local licenses, hosting fees, and training beyond that provided through HMIS project.

3. House the System Administration I position. With the support of the HMIS project assigned training staff, that person will:

    a. Guide the HMIS process locally.

b. Complete required trainings with regard to Privacy and System Use.

c. Respond to questions from the assigned Agency Administers (HMIS Lead Person at each agency) and provide on-site help as needed.

d. Convene/coordinate Community User Meetings and local group trainings.

e. Report database problems/successes to HMIS project committee

f. Attend System Administration User Meetings to share and benefit from the lessons learned across the State.

g. Mine the database for Continuum-wide numbers and report to CoC Steering and Executive Committees. The degree to which this activity occurs at a local level will be determined at the local level.

10.C Trainer and Technical Assistance Coordinator

1. The Training Coordinator will provide training and technical assistance through remote meeting software, web based training tools, classroom training and, as needed, site visits.

   a. Trainings will be designed to ensure homeless service provider organizations are in compliance with US Department of Housing and Urban Development (HUD) and Utah CoC HMIS requirements.

   b. Trainings are to support compliance with data and technical specifications, including maintenance of security, confidentiality and privacy requirements; reporting requirements; support efforts to strengthen and expand provider/community participation, improve data quality, and enhance and exploit the potential of HMIS implementations to measure program and system performance, and inform strategic planning and system change.

2. S/he will master the basic user workflow of the Utah CoC HMIS system and convey all components to users in training courses; design, develop and deliver both distance and classroom training programs and courses including materials, exercises and skills evaluation related to nay new policies and procedures as required by HUD or the Utah CoC; and provide user follow up after initial training, helping to ensure that agencies are capable of meeting all data quality and timeliness standards outlined by the CoC and HUD.

3. Additionally, s/he will coordinate and conduct training programs in-house and off-site, and potentially via the web; and handle all registrations and related correspondence.

4. The Coordinator will also explore new and creative ways of providing user training and support such as videos, webinars, social media, and develop such tools.

5. The HMIS Training coordinator will maintain the Utah CoC HMIS Policies & Procedures, making updates and revisions as needed; and provide training to homeless services providers on the HMIS Policies & Procedures on a regular basis.

10.D Research Analyst

1. Reporting to the HMIS Manager, the Data Analyst will support the development and implementation of the Homeless Management Information System in Utah. The HMIS Data Analyst will provide strategic statistical analysis to support system planning, community investment and performance management.

2. The Data Analyst will be responsible for the quantitative analysis of ESG funded programs using various reporting techniques to assess business processes and resource allocation; provide analytical supports to the Communication, Research and management teams to inform CoC business and strategic planning decisions.

3. Primary duties and responsibilities include:

   a. Cleaning, mining and analyzing HMIS data to identify patterns and correlations among the various data elements.

   b. Developing and generating reports/data pulls for HMIS, participating agencies, and external parties.

   c. Conducting statistical analysis on programs performance and activity levels.

   d. Interpreting results of the analysis in the manner understood by general public.

e. Providing analytical supports to inform the Ten Year Plan rewrite and funding allocation.

f. Applying both quantitative and qualitative data analysis techniques using statistical and descriptive research methodologies.

g. Providing participating programs with assistance to build agency capacity in terms of data analysis, including on-site support.

h. Monitoring data quality with regard to accuracy, timeliness and completeness and notifying agencies if problems arise by using data quality reports.

i. Researching, interpreting and preparing information for community debriefing, annual meetings, community reports and grant applications as needed.

j. Ensuring that relevant components of the Ten Year Plan to End Homelessness are integrated into the HMIS structure.

k. Undertaking research on specific issues including responding to inquiries and answering questions from the participating agency staff.

11.   REFERENCES

Many of the definitions included in this document are pulled from the following sources.

HUD. (n.d.). *2013 Housing Inventory Count and Point-in-Time Count or Homeless Persons; Data Collection Guidance*. Retrieved June 21, 2013, from https://www.onecpd.info/resources/documents/2013HICandPITGuidance.pdf

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HUD. (n.d.). *Supportive Housing Program Fact Sheet*. Retrieved June 21, 2013, from http://www.hudhre.info/index.cfm?do=viewSupportiveHousingProgram#d

12.   APPENDICES

APPENDICES	DOCUMENT TITLE
Appendix A	Agency Partner Agreement
Appendix B	Data Sharing Memorandum of Understanding
Appendix C	End User Agreement
Appendix D	Research Access Agreement
Appendix E	Privacy Posting
Appendix F	Informed Consent Release Form
Appendix G	Grievance Filing Form
Appendix H	UHMIS Security Checklist
Appendix I	Utah HMIS and Continuum of Care Memorandum of Understanding
Appendix J	Utah HMIS Steering Committee By-Laws

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM
AGENCY PARTNER AGREEMENT

I. *Purpose and Policy*

A. The Agency shall uphold baseline standards, as issued by the U.S. Department of Housing and Urban Development and the desire for any related procedure or practices to be consistent with HUD standards (see Final Revised HMIS Data Standards March 2010 for additional information).

   a. The baseline standards for HMIS issued by HUD, and the desire for this privacy and any related procedure or practices to be consistent with HUD standards. (see 69 Federal Register 45888, July 2004 for additional information)

5. UHMIS Lead Agency operates in an "open with exception" manner to insure that necessary and appropriate referrals and coordinated case planning takes place. All records are open for sharing unless otherwise closed by the entering agency to ensure that the designed purpose and need for sharing of UHMIS information is met.

   a. The standard sharing for all participating agencies will be to share a client's Name, gender, partial SSN, birth date.

6. Confidential information shall be defined as any and all information relating to past or present clients, any information required by law to be kept confidential, computer codes, passwords and access information for the HMIS, and any information designated as confidential by the disclosing party.

7. Client authorization to release information shall also be established through the use of a written, signed **Informed Consent Release Form,** to be completed at the point-of-entry participant agency site and retained on file.

8. The Agency shall solicit consent from Clients to share their information across the UHMIS database. The Agency agrees not to release any confidential information received from the UHMIS database to any organization or individual without proper Client Consent.

   The agency can release information for the following exceptions:

   a) When required by law and to the extent that use or disclosure complies with, and is limited to, the requirements of the law.

   b) When a provider reasonably believes that a child or vulnerable adult is a victim of abuse and neglect and should be reported

   c) To create unduplicated data within the UHMIS system, where only users who have signed a user agreement to maintain client privacy and protections are allowed to access disaggregated data.

   d) To avert a serious threat to health or safety if:

   i. The service provider believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public.

   ii. The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

   e) To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards for ethical conduct)

   i. In response to a lawful court order, court ordered warrant, subpoena or summons issued by a judicial officer or a grand jury subpoena, unless otherwise restricted by law.

   ii. If the service provider believes in good faith that the protected personal information constitutes evidence of criminal conduct that occurred on its premises.

   f) When required for payment or reimbursement for services. Information disclosed is to be used only for payment or reimbursement for services, and remains protected by this policy.

9. Agency will ensure that the necessary users and personnel have the appropriate certifications to access the UHMIS software.

   a. The agency will need to have at least one person certified in each certification level. This can be three different individuals that is certified in the appropriate level, or one individual who is certified in each level.

10. The Agency shall ensure that all staff, volunteers and other persons issued a User ID and password for the UHMIS receives certification training provided by the UHMIS team.

11. Partner Agencies are bound by all restrictions placed upon the data by the client of any Partner Agency. The Agency shall diligently record all restrictions requested. <u>The Agency shall not knowingly enter false or misleading data under any circumstances.</u>

12. If this agreement is terminated, the Utah SCSO's UHMIS Lead Agency and remaining Partner Agencies shall maintain their right to the use of all Client data previously entered by the terminating Partner Agency; this use is subject to any restrictions requested by the client.

13. Clients who choose not to authorize sharing of information cannot be denied services for which they would otherwise be eligible.

14. If a Client withdraws consent for release of information, the <u>Agency</u> remains responsible to ensure that the Client's information is unavailable to all other Partner Agencies.
    i. If Agency is unsure on how to do this, they must contact UHMIS staff to inform them of the clients request and ensure that sharing rights are revoked for that client.

15. The Agency will utilize the UHMIS Data Sharing MOU, as developed in conjunction and coordination with Partner Agencies, for all clients providing information for the UHMIS database. The Client Data Sharing Consent form, once signed by the client, authorizes Client data to be shared with UHMIS Partner Agencies.
    i. The Agency shall maintain appropriate documentation of Client consent, including but not limited to the Client Data Sharing Consent Form in the UHMIS database.
    ii. The Agency shall keep signed copies of the Client Data Sharing Consent Form, and other client consent forms for the UHMIS for a period of seven years.

II. *Data Entry and Use*

A. The Agency shall follow, comply with and enforce the End-User Agreement & UHMIS Standard Operating Policies and Procedures within the Agency. Modification to the User Policy and Standard Operating Policies and Procedures shall be made by the UHMIS Staff with input from the Steering Committee of the three state Continua. This will be done on an as needed basis for the purpose of the smooth and efficient operation of the UHMIS system. The UHMIS Lead Agency through the Utah SCSO will announce approved modifications in a timely manner.

B. Agencies will only use lawful and fair means by which to collect Personal Protected Information (PPI) with the knowledge or consent of the client. The Agency needs to full respect each individual's right to privacy, confidentiality, and safety.
    i. PPI will only be collected for the purposes listed above.
    ii. Clients will be made aware that personal information is being collected and recorded.
    iii. Agency will post **UHMIS Privacy Posting** in locations where PPI is collected.
        a. A copy of this written notice can be found in Appendix G of the UHMIS SOP Manual
        b. This posting will be explained in cases where the client is unable to read and/or understand it.

    iv. Clients must sign *Informed Consent Release Form* on file at the entering agency.
    v. Client's PPI will not be turned over into a national database. It's important that the client's rights to their information are honored by all UHMIS participating agencies.
    vi. PPI that is gathered needs to be accurate, complete, and relevant; and entered into the system in a timely manner.
        c. All PPI collected will be relevant to the purposes for which it is to be used.
        d. Identifiers will be removed from data that is not in current use after 7 years (from date of creation or last edit) unless other requirements mandate longer retention.
        e. Data will be entered in a consistent manner by authorized users.
        f. Data will be entered in "real-time" when possible, or within 5 to 10 business days of initial intake, contact, or provided service.
        g. Measures will be developed to monitor data for accuracy, completeness and for the correction of errors.
        h. Data quality is subject to routine audit by UHMIS System Administrators who have administrative responsibilities for the database.

C. **The Agency shall consistently enter or upload information into the UHMIS database with <u>5 to 10</u> working days of seeing the client. This is to ensure that accurate and timely data is being reported to Local, State, and Federal government entities. Data should be entered or uploaded within 24 hours where possible.**

D. The Agency shall utilize the UHMIS database for business purposes only.

E. The UHMIS team will provide initial training and certification (including confidentiality training) and periodic updates to Agency staff on the use of UHMIS software.
    i.   Agency staff will attend all pertinent meetings with the UHMIS team and the Utah SCSO as required.
    ii. The Agency's Program Managers should hold regular user meetings and report all pertinent information (i.e. software issues, trouble with entering or placing client, etc.) to the UHMIS Help desk.

F. The UHMIS team will provide general technical assistance via a Help Desk and periodic site visits as deemed appropriate for the purpose of troubleshooting and report generation.

G. The transmission of material in violation of any federal or state regulations is prohibited. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.

H. The Agency shall not use the UHMIS database with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

I. The Agency staff should fully inform clients about the limits of confidentiality in a given situation, the purposes for which the information was obtained, and how it may be used, per appropriate State and Federal guidelines.

J. When providing a client with access to his/her UHMIS records, the Agency staff should provide either a screen visual without allowing direct access to input devices or a hard copy printout. Appropriate measures should be taken to protect the confidentiality of all other records.

K. The Agency staff should afford clients reasonable access to any UHMIS records concerning them, in accordance with Agency internal policies and procedures.

III. Reports

A. The Agency shall retain ownership of identifying and statistical data on the clients it serves.

B. The Agency's access to data on clients it does not serve shall be limited to non-identifying and statistical data without written consent.

C. The Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless person or persons at risk of homelessness, in accordance with the UHMIS procedures on data use and release. However, such aggregate data shall not directly identify individual clients.

D. The Utah SCSO will use only aggregate UHMIS data for homelessness related policy and planning decisions, in preparing federal, state or local applications for homelessness and housing funding, to demonstrate the need for and effectiveness of programs and to obtain a system-wide view of program utilization in the state.

E. The UHMIS staff may need to view data on occasion for quality assurance purposes. The UHMIS staff will follow all guidelines and restrictions on data.

IV. Proprietary Rights of UHMIS

A. The Agency shall not give or share assigned user identification and passwords access codes of the UHMIS database with any other Agency, business, or individual.

B. The Agency shall not intentionally cause in any manner, or way corruption of the UHMIS database in any manner.

V. Hold Harmless

The Utah SCSO and the UHMIS Lead Agency makes no warranties, expressed or implied. The Agency, at all times, will indemnify and hold the Utah SCSO harmless from any damages, liabilities, claims, and expenses that may be claimed against the Agency; or for injuries or damages to the Agency or another party arising from participation in UHMIS; or arising from any acts, omissions neglect, or fault of the Agency or its agents, employees, licensees, or clients; or arising from the Agency's failure to comply with laws, statutes, ordinances, or regulations applicable to it or the conduct of its business. This Agency will also hold the Utah SCSO harmless for negative repercussions resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption caused by the Agency's or another Participant Agency's negligence or errors or omissions, as well as natural disasters, technological difficulties, and/or other events out of its control. The Utah SCSO shall not be liable to the Agency for damages, losses, or injuries to the Agency or another party other than if such is the result of the gross negligence or willful misconduct of the Utah SCSO.

VI. Terms & Conditions

A. The Agency recognizes the HMIS Steering Committee to be the discussion center regarding UHMIS, including UHMIS process updates, policy and practice guidelines, data analysis, and software/hardware upgrades. The Agency may designate an assigned UHMIS user within their agency to attend the Utah Homeless Information Committee meetings regularly, and understands that the Committee will continue to be responsible for coordinating the UHMIS activities.

B. The Agency understands that periodic updates and/or changes to data requirements may occur based on HUD mandate, State mandate, or by the Continua of Care. UHMIS staff will provide due notification before such changes take effect.

C. Neither the Utah SCSO nor the Agency shall transfer or assign any rights or obligations without the written consent of the other party.

_____

Agency

_____   _____

Agency Executive Director   Date

_____   _____

HMIS Director   Date

UTAH HMIS

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM
DATA SHARING
MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding between *(Primary Reporting/Funded Agency)* and *(list the Partner Agencies)* outlines what client level information is to be shared between these partnering agencies for the _____ Program.

It is understood between these partnering agencies that all participating clients will have to sign an interagency consent form that demonstrates that they understand and agree to have their information shared with the herein listed agencies. A hard copy of this consent form will be kept in the client's file at *(an appointed agency)*. *(An appointed agency)* will be responsible for ensuring that this release form is tracked within the UHMIS software.

(Primary agency) will grant access of afore mentioned client data to the following agencies:

1. **Partner Agency** _____ **& designated contact person** _____

2. **Partner Agency** _____ **& designated contact person** _____

3. **Partner Agency** _____ **& designated contact person** _____

4. **Partner Agency** _____ **& designated contact person** _____

5. **Partner Agency** _____ **& designated contact person** _____

Information to be shared:

It is understood that all agencies and users will be accountable for following all security and privacy policies. The list below outlines which elements are to be viewable, but not altered, and will allow for creation of additional records, considered "Shared" or "Not Shared". It is understood that a portion of the Universal Data Elements are shared with all UHMIS Partnering Agencies globally.

What is Shared	Not Shared	Shared
CLIENT RECORDS		
Name, DOB, and Partial SSN		X
TRANSACTIONS		
Assessments: Employment, Income/Non-Cash Benefits, Barriers, Education, Health **Enrollments:** Housing, Shelter, Other Program Placements **Services:** This includes services that are associated with the enrollments of the programs.		X
*Exceptions (Default is not shared) • Domestic Violence Assessment • Case Notes • Barriers: HIV/AIDS, Mental Health, Substance Abuse	X	Can be shared on a case by case basis if necessary.

Agreed upon exceptions for Sharing Records: (Please specify any of the aforementioned exceptions)

1. _____
2. _____
3. _____
4. _____
5. _____

Responsibility by Agency:

The following are responsibilities for completing the necessary tasks within the UHMIS software in order to complete compliance reporting and can be delegated to any agencies within the partnership. Please note: While these duties may be delegated to agencies other than the reporting or lead agency, the lead agency is ultimately responsible for all data related to the program funded tied to compliance reporting.

Please list appointed agency and designated contact person:

- **Client Intake: _____**

- **Program Enrollment:** *Must be funded or primary agency*

- **Client level Annual & Exit Assessments: _____**

- **Client level tracking of supportive services: _____**

- **Client level unit/bed occupancy tracking: _____**

- **Annual/Compliance Reporting (APR):** *Must be funded or primary agency*

Agreement:

By signing this document each agency involved agrees to the terms set by this document and accepts all roles and responsibilities herein, as well as compliance with the UHMIS Operating Policies and Procedures.

Primary Reporting Agency Name	Agency Director (Please Print)
Date Signed	Agency Director Signature

Partner Agencies

Agency Name	Agency Director (Please Print)
Date Signed	Agency Director Signature
Agency Name	Agency Director (Please Print)
Date Signed	Agency Director Signature
Agency Name	Agency Director (Please Print)
Date Signed	Agency Director Signature
Agency Name	Agency Director (Please Print)
Date Signed	Agency Director Signature

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM
END-USER AGREEMENT

Printed Name_____ Agency_____

Job Title_____ E-mail/Phone_____

Identified User Group_____ Program_____

SECTION I

PURPOSE OF POLICIES & PROCEDURES FOR DATA IN THE UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM (UHMIS)

The purpose of this agreement is to: 1) ensure that information collected as part of UHMIS will affirm the basic right of clients to have the confidentiality of their information protected; 2) establish directions for the release of confidential information; 3) cite ethical/legal exception to the right of confidentiality; and 4) create procedures to ensure client confidentiality while providing for the exchange of information necessary for continuity of care.

SECTION II

USER POLICY, RESPONSIBILITY STATEMENT, & CODE OF ETHICS

User Policy
At the discretion of the UHMIS Partner Agency, information for provision of services to homeless persons may be shared through the networked infrastructure that establishes electronic communication among the Partner Agencies.

Partner Agencies shall at all times have rights to the data pertaining to their clients that was created or entered by them in UHMIS. Partner Agencies shall be bound by all restrictions imposed by clients pertaining to the use of personal data. The UHMIS Informed Consent Release Form must be signed in order for identifying information to be shared with Partner Agencies. Partner Agencies bound by HIPAA or 42 CFR Part 2 are expected to develop and administer appropriate consent and Notice of Privacy Practices documentation in compliance with all appropriate State and Federal regulations.

Minimum data entry on each Client shall consist of the Universal Data Elements as defined in the March 2010 HUD Data Standards. This standard is subject to modification by State and Federal policymakers. Data necessary for the development of aggregate reports of homeless services, including services needed, services provided, referrals and Client goals and outcomes should be entered to the greatest extent possible.

The UHMIS is a tool to assist agencies in focusing services and locating alternative resources to help homeless persons. Therefore, agency staff shall only use the Client information in UHMIS to target services to the Client's needs.

User Responsibility
The user ID and password is given to access to the UHMIS statewide. Users will have to initial each item below to indicate they understand and accept the proper use of your User ID and password. Failure to uphold the confidentiality standards set forth below may result in a breach of client confidentiality. By initialing below and by signing this form UHMIS you are agreeing to uphold all confidentiality standards.

_____ User ID and password are for the user's use only and must not be shared with anyone.

_____ Users take all reasonable means to keep their password physically secure.

_____ Users must understand that the only individuals who can view information in UHMIS are authorized users and the clients to whom the information pertains.

_____Users can only view, obtain, disclose, or use the database information that is necessary to perform their job, and which complies with clients' signed permission to release information.

_____If a user is logged into the UHMIS and must leave the work area where the computer is located, they must log-off of the software before leaving the work area. Users will not leave a computer unattended that has the HMIS software "open and running".

_____Users or the agency will keep hard copies of appropriate UHMIS information/documentation in a secure place. All client information will be kept secure by ensuring that all hard copies of client forms are locked and secure when unattended. When hard copies of the UHMIS information are no longer needed they will be archived for up to seven years. Beyond that, hard copies of the records must be properly destroyed to maintain confidentiality.

_____If a user notices or suspects a security breach; they must immediately notify the Agency Administrator for UHMIS or the System Administrator.

_____Users will not knowingly enter false or misleading client information into HMIS under any circumstances.

_____Users will ensure that they are making the best effort to collect any and all necessary back up documentation for client level information.

User Code of Ethics
A. UHMIS Users must treat partner agencies with respect, fairness and good faith.
B. Each UHMIS User should maintain high standards of professional conduct in the capacity as a UHMIS User.
C. The UHMIS User has primary responsibility for his/her client(s).
D. UHMIS Users have the responsibility to relate to the clients of other partner agencies with full professional consideration.

I understand and agree to comply with all the statements listed above.

_____   _____
UHMIS User Signature   Date

_____   _____
Agency Director   Date

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM
RESEARCH ACCESS AGREEMENT

Purpose

The purpose of this document is to provide an agreement as well as guidelines to be followed between the State Community Services Office (SCSO) UHMIS Administration and _____, (referred
<div align="center">(Person or Entity)</div>

to as researcher) in regards to the access of client level information from the Utah Homeless Management Information System.

Access

It is understood that researcher will have access to **<u>de-identified</u>** client level information with a unique Client ID. The specific information that can be utilized will be:

- De-identified Universal Data Element Fields (as per the March 2010 Data Standards)
- Program Data Element Fields (as per the March 2010 Data Standards)
- Program entry and exit dates
- History of Client Services received

Guidelines

Listed below are the guidelines to be followed by any researchers requesting UHMIS data:

- Researcher will provide a specific list of information they are requesting and the purpose of the research they are conducting.

- UHMIS Administration will provide de-identified information to researcher as needed for the research purposes as per the request made by researcher if approved.

- If required, UHMIS Administration will link individual level data from UHMIS to data collected indirectly by researcher and will provide combined data with all clients' identifying information removed from the dataset.

- If researcher requires additional follow-up, it is understood that the request will have to go through the UHMIS Administrator to get additional de-identified data.

- Researcher will follow all terms outlined in the UHMIS Security Privacy Policy, and will not provide client level data to any other entities or persons.

- Researcher will provide publishing credit to SCSO as the source of data for any results or findings.

- Researcher understands their responsibility to maintain the overall security of the data.

- UHMIS Administration has the right to revoke access and/or dissemination rights to data.

By signing this agreement researcher understands the responsibility to uphold and follow the guidelines listed above.

_____   _____
Researcher Signature   Date

_____   _____
UHMIS Administrator   Date

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM
PRIVACY POSTING

PLEASE READ CAREFULLY

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

If you have any questions or would like to see our privacy policy, our staff will provide you with a copy.

UTAH HMIS

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM
Informed Consent Release Form

<u>PLEASE READ THE FOLLOWING STATEMENTS.</u>
<u>MAKE SURE YOU HAVE HAD THE CHANCE TO HAVE YOUR QUESTIONS ANSWERED.</u>

_____ is part of the Utah Homeless Management Information System (UHMIS).
(Agency Name)

UHMIS is a system that uses computers to collect information about homelessness. The reason for UHMIS is to track funding for homeless programs given by many funders. The goal is to simplify service delivery to people in need.

UHMIS operates over the internet and uses many security protections to keep your information safe. Many service providers across Utah use UHMIS, so your information will be shared with other service providers that provide similar services. Information collected is housed in a secure server located at Data System International (DSI), in Sandy, Utah. DSI employees have access to this server and the data housed there, but only for network support and maintenance purposes. UHMIS staff and approved Utah State Community Services Office (SCSO) staff collect and use only information that is needed for reports on homelessness to help inform policy decisions. Every person with access to this information must sign and comply with all confidentiality agreements.

To better provide services to you in the best way possible _____is asking your
(Agency Name)

permission to share your information with the other approved UHMIS participating agencies in Utah. This will include sharing the following information about you and any dependant minor children with you:

- **Name, gender, SSN, birth date**

By signing this form you are letting us share your information, and the information of your dependent children under the age of 18 with other UHMIS participating agencies. This information will be accessible for seven years from the last date of service.

You may cancel this consent at any given time by written request to this agency. The cancellation will not be applied to records already collected from you. If you choose to not give consent, it **does not** make you ineligible to receive services unless you are applying for the Homeless Prevention and Rapid Re-housing Funding (HPRP or TANF).

Your Rights
- You have the right to get services even if you choose **NOT** to participate in the UHMIS.
- You have the right to ask who has seen your information.
- You have the right to see your information and to change it if it's not correct. But you must show documentation.

A list of participating agencies is available from your case manager or online at http://hmis.utah.gov. If you don't want your information shared with a specific agency, please let your case manager or intake worker know. He/she can then take the proper action to honor your request.

_____   _____

SIGNATURE OF CLIENT (AND/OR GUARDIAN)   DATE

_____   _____

PRINTED NAME OF CLIENT   DOB OF CLIENT

_____

SIGNATURE OF INTAKE WORKER/CASE MANAGER

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM GRIEVANCE FILING FORM

If you think we may have violated your privacy rights or you disagree with a decision we made about access to your "Protected Information" you may complete this form.

It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.

Grievance must be submitted in writing to:

> **State Community Services Office**
> Attn: HMIS Lead Agency Management
> 1385 South State, Fourth Floor
> Salt Lake City, UT 84115

Please provide information regarding the violation.

Date of offense: _____

Name of **Individual** who violated your privacy rights**:** _____

Name of the **Agency** that violated your privacy rights**:** _____

Provide a description of the grievance:

_____

_____

_____

_____

Please list your contact information:

Name:_____   **Phone #:**_____

Mailing Address:_____   What is the best method to contact you:

_____   ☐ Phone   ☐ Mailing Address

_____   ☐ E-mail

E-mail:_____

HMIS Staff Only

Date Received:_____   Date Reviewed:_____

Recommendation to Agency:_____

_____

_____

_____

UTAH HMIS

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM SECURITY CHECKLIST

Name _____

Email Address _____

Organization _____

Date of the Review _____

A.	CHO Security Office Section	Yes	No	Comments to Improve/Fix
1.	Do you have a signed copy of the "Agency Partner Agreement for Utah Homeless Management Information System" for your agency?			
2.	Do you have a signed copy of a "UHMIS End-User Agreement" for each authorized user within your organization?			
3.	Have all employees entering/viewing HMIS data attended the UHMIS end user training?			
4.	Have you reviewed the policies and procedures manual (December 2013 Version) with in the past year?			
5.	Has your agency conducted a background check on the CHO security officer?			
6.	Does your agency only collect, enter and extract HMIS data that are relevant to the delivery of homeless services?			
7.	Does your agency limit access to information provided by the Utah HMIS database to its own employees specifically for verifying eligibility for service or entering records into the system of service provided?			
8.	Do you have a written policy to keep track of UHMIS users who leave the agency?			
9.	Do you notify the UHMIS lead security officer within two businesses days of any UHMIS user that needs their user account deactivated?			
10.	Have you deactivated all user accounts that need to be deactivated?			

11. Is the UHMIS privacy policy posted in a common area viewable by those receiving services?			
12. Does your agency collect signed "UHMIS Informed Consent Release Form" prior to the client's information being entered into the UHMIS?			
13. Does your agency have a Quality Assurance Plan that to ensure that the UHMIS Informed Consent Release Form and all of the universal data elements are gathered?			
14. If data is extracted from the database and stored outside the private local area network, is it properly protected via encryption or by adding a file-level password?			
15. Do computers/phones/tablets used to access the HMIS have a locking screen saver? (Terminals must be locked when left unattended.)			
16. Are the computers/phones/tablets used to access the UHMIS password protected?			
17. Do the terminals that access the UHMIS system have virus protection with automatic updates and individual or network firewalls?			
18. Are the screens of the terminals to access UHMIS kept out of the view of non-authorized UHMIS users?			
19. Have there been any Security Incidents in the past year, as defined in the HMIS Security Plan?			

Comments:

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM DATA SHARING MEMORANDUM OF UNDERSTANDING BETWEEN:

The Salt Lake and Tooele Counties Continuum of Care

The Mountainland Continuum of Care

The Balance of State Continuum of Care

and

The State Community Service Office (SCSO), Housing and Community Development Division

of the State of Utah Department of Workforce Services (DWS)

A.   Purpose and Scope

The purpose of this Memorandum of Understanding is to confirm agreements between the Salt Lake and Tooele Counties (SLC) Continuum of Care (CoC), the Mountainland (Mtl) CoC, the Balance of State CoC and the State Community Service Office (SCSO), Housing and Community Development Division of the State of Utah Department of Workforce Services (DWS) in connection with the State of Utah Homeless Management Information System (UHMIS). As such, the Memorandum of Understanding sets forth the general understandings, and specific responsibilities of each party relating to key aspects of the governance and operation of UHMIS.

This consolidated and revised agreement is effective on January 27, 2014.

B.   Background

The State of Utah Homeless Management Information System (UHMIS) is a collaborative project of three CoCs within the State of Utah, namely Salt Lake and Tooele Counties, Balance of State, Mtl, SCSO, DWS, and participating Partner Agencies. HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) under the HEARTH Act for all communities and agencies receiving HUD CoC and Emergency Solutions Grant (ESG) homeless assistance funds. HMIS is essential to efforts to streamline client services and inform public policy. Through HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in the State of Utah and each Continuum, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation, and advocacy. The parties to this Memorandum of Understanding (MOU) share a common interest in collaborating to end homelessness and successfully implementing and operating HMIS in the State of Utah.

The three Continua of Care goal is to collaboratively provide a range of homeless housing and services. The continuum of care system components includes prevention, emergency shelter, transitional housing, permanent housing and permanent supportive housing. Outreach efforts and specialized supportive services actively identify and support homeless individuals and families and work with them to access mainstream resources. HMIS will enable homeless service providers to collect

uniform client information over time. Analysis of information gathered through HMIS is critical to accurately calculate the size, characteristics, and needs of the homeless population; these data are necessary to service and systems planning, and advocacy.

C. **General Understandings**

1. Governance
   The State of Utah CoCs are the lead planning groups of the HUD funded efforts to end homelessness and for implementing and operating a homeless system within their jurisdictions. As such and per HUD policy, the CoCs are responsible for HMIS project oversight and implementation, which encompasses:

   a) Planning,
   b) Administration,
   c) HMIS budget approval and oversight,
   d) Grant monitoring and work plan submission approval,
   e) Software selection,
   f) Managing of HMIS data compliance with HMIS data standards,
   g) Reviewing and approving all policies, procedures and data management plans contributing to HMIS Organizations.

   The CoCs oversight and governance responsibilities are carried out by its Steering Committee. The general decision making process is as follows:

   a) Draft policies, procedures, data management plans and other work will be reviewed, amended, and preliminarily approved by the Steering Committee.
   b) The CoC representatives on the Steering Committee are responsible to share draft policies, procedures, data management plans and other work with their perspective CoCs for CoC feedback and approval.
   c) The Steering Committee may give final approval of policies, procedures, data management plans and other work after receiving feedback and approval from each of the three CoCs.
   d) No policy, procedure, data management plan or other work may be approved by the Steering Committee without confirmation and approval by all three CoCs.

2. Steering Committee & Information Committee
   The State HMIS Steering Committee is made up of representation of all three CoCs for the State of Utah as well as ESG representation, local leaders and the Lead Agency HMIS staff. The role and responsibility of the Steering Committee is defined in the Governance in section C.1.

   The role and responsibility of the Information Committee is to provide analysis of trends and performance of the homeless system and detailed HMIS data reports as requested by each CoC objectives. This Committee will inform the Steering Committee and the SHCC of homeless data which may be collected outside of the HMIS system.

3. Lead Agency Designation
   The three CoCs designate SCSO, DWS to manage the HMIS operations on its behalf and to provide HMIS project administration functions including staffing with State employees and managing budget and grant requirements.

4. Compliance with HMIS Standards
   It is the responsibility of the CoCs to ensure the HMIS lead agency is operating the HMIS project in compliance with the HUD technical standards, HMIS data quality standards and other applicable laws. The parties agree to update this MOU and other HMIS operational documents, including policies and procedures in order to comply with any updates to these standards established in notices or other guidance, within HUD specified timeframes for such changes. Oversight will be provided by the HMIS Steering Committee.

5. Contributing HMIS Organizations (CHO)
   A CHO is defined as an organization (inclusive of the HMIS Lead) that operates a provider program and a program level, HMIS compliant system, whether or not it is a member of a CoC or receives any federal (HUD), State, County or City funding

that contributes Protected Personal Information or other client level data to the HMIS database. The CHOs must enter into Participation Agreements in order to contribute such data to HMIS. The authority to enter into the Participation Agreement with the CHO for the purpose of insuring compliance with all applicable HUD and ESG HMIS requirements, including the operation of a program level HMIS compliant system, rests with the HMIS Lead Agency.

6. Funding
   a. HUD Grant
      i. HMIS activities are covered by HUD CoC grants and HUD-required local match funds. The terms and uses of HUD funds are governed by the HUD CoC grant agreement and applicable rules.

   b. HMIS Cash Match
      i. The HUD CoC grant comes with a cash match requirement. As detailed below, SCSO is retaining responsibility for the commitment of the local match for HMIS.

   c. Fees
      i. No fees will be charged to any CHO wishing to provide data to HMIS. CHOs are required to pay their own costs associated with establishing and operating their own program level, HMIS complaint system in accordance with the terms of participation Agreement and adhere to HMIS data security standards.

7. Software and Hosting
   The three Continuum of Care for the State of Utah have selected a single software product—ClientTrack—to serve as the sole UHMIS software application for the State of Utah. All Partner Agencies agree to use ClientTrack for all HUD CoC and ESG funded programs with the exclusion of Domestic Violence Programs.

8. Compliance with Homeless Management Information System Standards
   The HMIS is operated in compliance with HUD HMIS Data and Technical Standards and other applicable laws. The parties anticipate that HUD will approve the new HMIS standards and guidelines and the parties agree to make changes to this MOU, other HMIS operational documents, and HMIS practices and procedures to comply with the expected revisions, within the HUD-specified timeframe for such changes.

9. Local Operational Policies and Agreements
   The HMIS continues to operate within the framework of agreements, policies, and procedures that have been developed and approved over time by the CoCs through its HMIS Steering Committee and Information Committee. These agreements, policies and procedures include but are not limited to the Policies and Procedures Manual, Privacy Policies and Notices, Client Consent Forms, Client Release of Information (ROI) Forms and Procedures, Standardized Information Collection Forms (Intake and Exit), Partner Agency Agreements, and User Agreements. Changes to the policies and procedures may be made from time to time by the CoCs, through its HMIS Steering Committee, to comply with the HMIS Standards or otherwise improve HMIS operations. It is expected that the CoCs may want to make some changes to the policies and procedures to accommodate its unique approach to managing and administering HMIS with the new HUD standards for centralized intake and coordinated Assessment. During any transition, all existing HMIS policies and procedures will remain in force until such time as the CoCs and the HMIS Steering Committee and Information Committee agree to such changes.

10. **Specific Responsibilities of the Parties**

    1. The Salt Lake and Tooele Counties CoC, Mountainland CoC, and Balance of State CoC

    The Salt Lake and Tooele Counties, Mtl, and the Balance of State CoCs make up the HMIS governance body, providing oversight, project direction, policy setting, and guidance for the HMIS project. The three CoC will exercise all its responsibilities for HMIS governance through its HMIS Steering Committee members with support from the Information Committee.

A. These responsibilities include:

a) Responsible for ensuring and monitoring compliance with the HUD HMIS Standards.
b) Responsible for monitoring and assessing the effectiveness of the designated UHMIS agency.
c) Designate the HMIS Lead Agency and the software to be used for HMIS, and approve any changes to the HMIS Lead Agency or software.
d) Conduct outreach to and encourage participation by all homeless assistance programs and other mainstream programs serving homeless people.
e) Develop and approve all HMIS operational agreements, policies, and procedures through the Steering Committee.
f) Inform elected officials, government agencies, the nonprofit community, and the public about the role and importance of HMIS and HMIS data.
g) Guide data quality and reporting efforts, as well as assist with holding CHOs accountable for data quality and agreements to improve these elements.
h) Promote the effective use of HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs.
i) Work to insure that participating CHOs provide all necessary information for compilation of the CoC Housing Inventory Chart, and support SCSO/HMIS in preparing the Annual Homeless Assessment Report (AHAR).
j) Work to ensure participating CHOs are effectively working on performance measurement standards set by the CoC. Support the efforts of the HMIS team, HMIS steering Committee and Information Committee with participating CHOs on improving performance and data quality.
k) Work with HMIS team to set milestones and goals through the Steering Committee.

2. The State Community Services Office (SCSO)

SCSO serves as the lead agency for the HMIS project, managing and administering all HMIS operations and activities. SCSO exercises these responsibilities at the direction of the State of Utah CoCs.

A. General Responsibilities:

a) Serve as the liaison with HUD regarding the HMIS for all three Continuums in the State of Utah.
b) Serve as the liaison with the software vendor. SCSO is responsible for a successful HMIS project, including data, software vendor contract and licensing, security arrangements, and contractor agreements.
c) Lead the HMIS Information Committee.
d) Provide overall staffing for the project.
e) Participate in the Steering Committee.
f) Comply with HUD HMIS Standards (including anticipated changes to the HMIS Standards) and all other applicable laws. Setup and maintenance of HMIS database in accordance with the HEARTH Act.
g) Annually prepare all HUD McKinney-Vento CoC Supportive Housing NOFA application for HMIS funding within the State of Utah, applying for renewal funds each year, and administering the HUD HMIS grants. Grants and quarterly reports including detailed budget expenditures will be given to Steering Committee for review and approval prior to submission to HUD.
h) Provide all required match funds for HMIS grants. Lead the effort to engage other participating agencies in funding a portion of HMIS (i.e. Veterans, ESG, etc.)
i) Provide required trainings for all end users and administration and manage end user licenses (per terms of grant agreement with HUD).
j) Create project forms and documentation in accordance with HUD HMIS guidelines.
k) Provide and maintain the project website.
l) Prepare project policies and procedures, UHMIS Standard operating Policies and Procedures (approved by the HMIS Steering Committee with support from the Information Committee).
m) Obtain and maintain signed Partner Agency MOUs including privacy and security agreements.

B. Administering HMIS vendor contract with Data System International (ClientTrack) responsibilities include:

a) Server security, configuration, and availability.
b) Setup and maintenance of hardware HMIS.
c) Maintenance of software.
d) Configuration of network and security layers.
e) Anti-virus protection for server configuration.
f) System backup and disaster recovery (disaster recovery provided by ViaWest, central server provider).
g) Take all steps needed to secure the system against breaches of security and system crashes.
h) Ensure system uptime and monitoring system performance.
i) Protect confidential data (in compliance with HUD Standards, local privacy policies, and other applicable law), and abide by any restrictions clients have placed on their own data.
j) Develop and implement security and confidentiality plans if required by the revised HUD HMIS Standards.

C. Administering HMIS end users, including:

a) Add partner agency programs to HMIS these include: HUD CoC funded programs, Emergency Solutions Grant (ESG) funded programs, VA Grant Per Diem (GPD), VASH, SSVF, HOPWA and State Funded programs for the homeless.
b) Manage user licenses

D. Training

Provide all training and user guidance needed to ensure appropriate system use, data entry, data reporting, and data security and confidentiality, including:

a) Training documentation
b) Conduct confidentiality, privacy and security training
c) Provide ClientTrack software training for agency administrators and end users
d) Outreach to users/end user support
e) Provide and coordinate technical assistance and support
f) Respond to helpdesk issues reported in ClientTrack
g) Conduct quarterly User Group trainings
h) Develop and support comprehensive training materials, training manuals and website resources
i) Ensure HMIS training is conducted with every new user before giving access to the database.

E. Data Quality

a) Ensure all client and homeless program data are collected in adherence to the HUD HMIS Data Standards. These include the Universal data elements and program specific data elements.
b) Establish HMIS data quality benchmarks with the direction of the Steering Committee.
c) Monitor data quality and generate agency level data quality reports quarterly for each CoC.
d) Provide specific data quality training.
e) Preparing and implementing a data quality plan if required by the revised HUD HMIS Standards.
f) Carry out aggregate data extraction and reporting including the HMIS data needed for an unduplicated accounting of homelessness including the annual Point in Time.
g) Assist partner agencies with agency-specific data collection and reporting needs, such as the Annual Progress Report and program reports (within reason and within constraints of budget and other duties).
h) Ensure that HMIS can generate reports for unduplicated client records.

F. Satisfactory Assurances Regarding Confidentiality and Security:

HMIS will designate a member of the team to act as the Security officer for the 3 CoCs. Their role and responsibility is to work with the participating CHOs, the Steering Committee and the Information Committee to ensure that those individuals entering client information enter into HMIS are properly trained and adhering to the privacy and security protections and requirements of HUD HMIS Standards, HIPAA Privacy Rule, other law, and local HMIS privacy and security policies and procedures. SCSO HMIS staff hereby agrees that it will use protected client information only for purposes permitted by agreement with the CoCs or with written approval for Research purposes. This information will be used by the Information Committee to produce the State Annual Homeless Report as well as the Point-in-Time. SCSO agrees it will make use of all safeguards required by HUD Privacy Standards, HIPAA Privacy Rule and, where appropriate, other law, and local HMIS privacy and security policies and procedures in order to prevent any unauthorized disclosure of protected client information.

G. Period of Agreement and Modification/Termination

1. Period of Operation and Termination: This MOU will become effective upon signature of the parties and shall remain in effect until terminated by the parties. Each party shall have the right to terminate this agreement as to itself only upon 90 days prior written notice to The SCSO, DWS. Violation of any component may be grounds for immediate termination of this Agreement.

2. Amendments: Amendments, including additions, deletions, or modifications to this MOU must be agreed to by all parties to this Agreement.

The signatures of the parties indicate their agreement with the terms and conditions set forth in this document.

The Salt Lake and Tooele Counties Continuum of Care

By_____   Date_____

The Mountainland Continuum of Care

By _____   Date _____

The Balance of State Continuum of Care

By _____   Date _____

Utah HMIS

The State Community Service Office, Housing and Community Development Division of the State of Utah Department of Workforce Services

By_____   Date_____

Lloyd S. Pendleton,

HMIS Director

Housing and Community Development Division

State of Utah Department of Workforce Services

UTAH HOMELESS MANAGEMENT INFORMATION SYSTEM STEERING COMMITTEE BY-LAWS

Background

The Utah Homeless Management Information System (HMIS) Steering Committee is an *approval/advisory* body that supports and enhances the overall mission of the Utah HMIS Lead Agency by advising HMIS Lead Agency staff on functions related to HMIS Lead Agency policies and guidelines and approving policies and procedures regularly.

Utah Homeless Management Information System Project Purpose

The HMIS is an on-line database system that serves agencies providing shelter, housing and services to homeless people and those at risk of homelessness across the state of Utah. The purpose of the project is to help provider agencies improve their services, to give access to the information necessary for providers to obtain funding for homelessness services, and to improve public policy toward homelessness.

Steering Committee

1. *Duties and Powers*

    The Steering Committee members shall be responsible for providing advice and counsel to HMIS staff and for responding to issues presented for consideration by the Director of HMIS. Specific duties include but are not limited to:
    i. Provide input on the various topics covered;
    ii. Participate in decision-making and recommend policy and make procedures;
    iii. Support coordination of statewide activities;
    iv. Assist in the creation of printed materials, brochures, and mailings;
    v. Review HMIS budget before each SHP grant submission annually; and
    vi. Disseminate information about the committee and the HMIS and gain consensus from Continua.
    vii. HMIS Staff will provide support to CoC representatives.

2. *Composition*

    The Steering Committee will be composed of 14-17 members. Seven members will be representatives from each of the state's three Continua of Care; five will be representatives from the Veterans Administration, PATH - Department of Human Services, ESG grantees including local and state governments. The HMIS Staff will select two HMIS End-Users from the HMIS End-User Group as ex-officio members. The HMIS Lead Agency may appoint other representatives as needed who are familiar with the challenges of a multi-continuum HMIS implementation and meeting the data needs of local, state, and federal funders.

3. *Resignation and Removal*

    A committee member may resign from the Advisory Committee by submitting written notice to the Chair or the Director of HMIS. A member may be removed by a two-thirds vote from the whole committee.

4. *Meetings*

    Meetings will be held ~~quarterly~~ every other month for at least the first year. Meetings will be attended by Committee members, the Director of HMIS, and the HMIS Lead Agency Coordinator. Meeting dates will be set by the Steering Committee during the last meeting of each calendar year. Members are expected to attend a minimum of 75% of the regularly scheduled quarterly meeting with at least two of the meetings attended in person.

5. *Quorum/Voting*

    Quorum consists of 51% of current members. Majority vote carries with 51%. Funders may send a representative to vote on their behalf.
    - Vote Tally

- o HMIS Staff – Two Votes
- o Balance of State and Mountainland Continua of Care – Two Votes Each (4 Total)
- o Salt Lake/Tooele Continuum of Care – Three Votes
- o Funders – One Vote Each (8 Votes Total)
  - ESG State, ESG SLCo, ESG SLC, ESG Provo, HOPWA SLC, HOPWA State, PATH, VA
- o 17 Votes Total

Officers

1. The Chair of the Steering Committee shall preside at all meetings of the Steering Committee. The Chair shall lead the committee in its duties and responsibilities. In the absence of the Chair, the Vice-Chair (or Chair-Elect) will assume the responsibilities of the Chair.
2. The Vice-Chair shall assist the Chair as necessary, leading the committee in its duties and responsibilities in the absence of the Chair, as well as performing such duties as may be assigned by the Chair.
3. The Secretary shall assist the Committee and the Director of HMIS and Special Projects in documenting and dispersing that documentation of the proceedings of the meetings and other documentation.

Elections and Appointments

1. Appointments

    Continuum of Care members of the Steering Committee will be elected by their CoC annually. These appointments will occur before the first quarterly meeting of the HMIS contract year, July 1st. Funders determine their representatives annually. Committee participation is not reimbursable; however, committee member participation will be used as leveraging for HMIS Lead Agency funding.

2. Elections for Officers

    Annually, at the last meeting of the year (May or June), the Steering Committee shall elect the three officers. The newly elected officers shall assume office at the close of that meeting. *There will be a term limit for elected officers of two years, with the Chair-Elect next in line to become Chair.*

Amendments

These Bylaws may be amended, repealed, or modified by the affirmative vote of a majority of the Steering Committee at a regularly scheduled meeting provided the proposed changes have been mailed to all members of the Advisory Committee Members two weeks in advance of the meeting. Copies of any such revised Bylaws shall be submitted to the Director of HMIS.