HMIS POLICIES AND PROCEDURES MANUAL
Southern Illinois Continuum of Care

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1 INTRODUCTION

This document provides the framework for the ongoing operations of the Southern Illinois Continuum of Care Network. The Project Overview provides the main objectives, direction and benefits of HMIS. Governing Principles establishes the values that are the basis for all policy statements and subsequent decisions. Service Point is a web based information management system for recording and sharing information on services provided to homeless consumers in the Southern Illinois Continuum of Care Network.

The primary or lead agency for the continuum is Stopping Woman Abuse Now (SWAN). The System Administrator (SA) is MISI. The SA is the grantee with the Service Point system. In this agreement, "participant" is the agency that uses Service Point.

The signature of the Executive Director or Chief Executive Officer indicates agreement with the terms set forth for a MISI account with the SA.

1. Operating Policies: Each participant agrees to follow and comply with the user policies and procedures and the guiding principles, each of which may be modified by the HMIS committee of the Continuum.
2. Technical Support: MISI will provide the software via the internet for each participant. The SA and MISI staff will provide the technical support needed to operate the system.

Participants will identify staff that will use the system and receive training. Any participant who terminates this agreement will promptly notify the SA of any termination of staff.

Operating Procedures provides specific policies and steps necessary to control the operational environment and enforce compliance in
a. Project participation
b. User authorization and passwords
c. Collection and entry of client data
d. Release and disclosure of client data
e. Server security
f. Server availability
g. Workstation security
h. Training
i. Technical support

Other obligations and agreements discuss external relationships required for the continuation of this project. Forms are utilized to provide client information and record keeping.

2 PROJECT OVERVIEW

The long term vision of HMIS is to enhance the partnerships that occur between the members of the continuum as well as enhance the collaboration, service delivery and data sharing capabilities when it is available. Domestic violence service providers within the continuum will not share data nor are they required to share data due to safety and legal issues. With the sharing of data and the participation in the HMIS, the continuum is in a better position to request funding from various sources including HUD funding and help to better plan for future needs for services for the homeless.

The intent of the HMIS is to not only comply with HUD funding requirements, but to become an integrated network of homeless services and other service providers that can use a centralized data base to collect, track, and report uniform information on client needs and services. This will not only meet Federal requirements, but should also enhance service planning and delivery.

The fundamental goal is to document the demographics of the homeless within the Continuum according to the HMIS data standards. Therefore it is the goal to identify patterns in utilization of assistance, establish an unduplicated count within the parameters of legal requirements and document the services provided. Data obtained will be analyzed by the lead agency, Stopping Woman Abuse Now, in that it will provide reports generated by the software. Annual progress reports will be available to each funded program or participating agency through the recording of data in the software system. The data garnered may be used to create reports to be made available to other funding sources, the Continuum members or individual agencies.

The project uses a web based system residing on a central server to facilitate data collection by homeless service providers within the Continuum. Access to the central server is restricted to agencies formally participating in the project and then only to authorize staff members who meet the necessary training and security requirements.

The HMIS lead agency for the Continuum is Stopping Woman Abuse Now. The lead agency Executive Director, Linda Bookwalter, is the Collaborative Applicant and HMIS lead for all agreements made with the continuum.. She is responsible for administration of the contract between the software service provider and the Continuum and the participating agencies user access. Stopping Woman Abuse Now staff in conjunction with the software provider will provide training, technical assistance and

monitoring of the system throughout the Continuum. These policies and Procedures may be amended. It is expected that information will be added, removed and altered as necessary.

A committee is established within the Southern Illinois Continuum to provide guidance to Stopping Woman Abuse Now regarding the utilization of this HMIS system. It also has the responsibility to request changes to the Lead Agency regarding issues of their Continuum on the HMIS and how it affects their Continuum. They will make recommendations to the HMIS lead agency regarding changes in the policies and procedures manual as well as whether or not the software provider is providing all of the needed services for the continuum.

Potential benefits for the Continuums include
    a. Aggregate information which can be used to develop programs for the homeless
    b. An ability to advocate for the homeless
    c. An ability to advocate for additional funding
    d. Complete grant applications
    e. Conduct evaluations of services
    f. Report to funding agencies such as HUD
    g. Capacity to generate Annual Reports
    h. Allows aggregate data to be obtained on homeless within the communities
    i. Identification of gaps in services
    j. Ability to complete an annual homeless count
    k. Ability to generate data to make policy decisions

3 GOVERNING PRINCIPLES

Described below are the governing principles upon which all decisions pertaining to HMIS are based.

A. Confidentiality- the rights and privileges of clients are crucial to the success of HMIS. The policies established will ensure that client confidentiality without impacting services. Services are the primary focus of agencies. Client information is founded upon the premise that a client owns his/her own personal information and the necessary safeguards are in place to protect the client, the agency and funding bodies. Collection, access and disclosure of client data through the participation in the HMIS will only be permitted by the adherence to the procedures set forth in this manual.

B. Data Integrity- Client data is the most valuable and sensitive asset of HMIS. These established procedures will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

C. System Availability – the availability of a centralized data repository is necessary to achieve the Continuum wide collection of data.

D. Compliance- violation of the policies and procedures set forth in this manual will have consequences. Any deliberate or intentional breach of confidentiality or loss of data integrity will result in withdrawal of system access for the offending entity.

4 Roles and Responsibilities

Participating homeless organization

1. The participating homeless organization (HA) who is participating in the HMIS shall abide by all policies and procedures.

2. Shall keep abreast of all current updates and policy changes relating to the software or HUD requirements.
3. Shall identify and approve their respective Agency Users.
4. Shall be responsible for entering Client data that is required and is consistent with the questions on the Service Point-Bowman system.
5. Shall provide if necessary funding to assist the HMIS Lead Agency with cash match when needed.
6. Shall sign an agreement with the Lead Agency and comply with all stated requirements.
7. Is responsible for reporting requirements with HUD or other funding sources.
8. Will work within their Continuum to establish policies regarding release of data for research purposes.
9. Be responsible for compliance with of the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards.
10. Every participating agency shall designate one person to be the Agency Administrator.
    a. This person will be responsible for ensuring that they have received training on the software, demonstrated an understanding of the requirements of the Policies and Procedures.
    b. Facilitating timely reporting from the Agency they represent
    c. Working cooperatively with the Lead Agency of the HMIS
    d. Notifying the HMIS Lead Agency of changes within the agency of Users.
11. Provide keep updated virus protection software on Agency computers that access the HMIS database.
12. Not use the software the intent to defraud the federal, state of local government, or any individual entity, or to conduct any illegal activity.

USER /AGENCY STAFF

1. The User shall follow, comply with and enforce the User Agreement. Any changes in the Agreement will be sent to the Participating Agency to distribute to the User.
2. Each User will have received training from the Software Provider before they are able to access the data. This training will be on line and not be completed by other agency staff.
3. Each user will comply with the User Agreement.
4. Each user will return a signed copy of the User Agreement to the HMIS Lead Agency before they are able to use the software system.
5. Each User will enter the data into the system in a timely manner not to exceed 48 hours within receiving the data.
6. Each User shall consistently enter information into the HMIS database and will strive for real time entry.
7. Each User will not alter data nor shall they enter data on clients that do not exist.
8. Each user must be aware of the sensitivity of the data and take appropriate measures to prevent unauthorized disclosure.
9. They must comply with HMIS HUD data requirements and the policies and procedures manual.
10. Each User will be assigned a user ID and a password. **SHARING OF USER ID OR PASSWORD IS FORBIDDEN.**
11. Each User will not cause in any manner, or way, corruption of the HMIS database in any manner.

HMIS LEAD AGENCY

1. It is the responsibility of the Lead Agency to select the software used to meet the requirements of the HUD HMIS system and present to the Continuum for approval.
2. The Lead Agency will provide a Memorandum of Understanding to be reviewed and approved by the Continuum
3. Develop and submit for approval a HMIS Policies and Procedure Manual.
4. Monitor all Participating agencies who participate in the HMIS for compliance with HUD Standards, Security and Privacy for the HMIS.
5. Ensure that all Users have received training before being assigned a User ID and Password and before they can enter data into the HMIS.
6. Provide quarterly reports to the Continuum as requested.
7. Work with the software provider to ensure that Participating Agencies, and Users are completing data entry in a timely manner
8. Ensure data quality
9. Proved technical assistance along with the software provider to the Participating Agency.
10. Attend HMIS training to ensure that the Participating Agency has the most current and up to date information regarding requirements of the HUD funded HMIS.
11. Work with the Continuum to ensure that homeless providers access the HMIS system
12. Work with the Continuum and Participating Agency to ensure that all Participating Agencies are in compliance.

13.   Notify the Continuum of any cash match requirements needed for the renewal application to HUD for funding of the HMIS.

14.   Work with the Continuum to identify any disclosure of data for research or funding requirements.

CONTINUUM RESPONSIBILITIES

1. The Continuum will work with the Participating Agency, HMIS Lead Agency to develop and implement a HMIS for the Continuum.
2. Will be responsible for approving the HMIS Memorandum of Understanding between the HMIS Lead Agency and the Continuum.
3. Will be responsible for review and approval of the HMIS Policies and Procedure manual presented by the HMIS Lead Agency.
4. Will work within the Continuum to increase the participation level in the HMIS
5. Will comply with the requirements of HUD regarding the implementation of the HMIS
6. Will develop rules and policies regarding the release of Continuum data for research and funding purposes.
7. Will work to resolve any grievance with Participating Agency and the HMIS Lead Agency.
8. Shall provide a contact person within the Continuum that the HMIS Lead Agency may contact regarding issues that arise
9. Will be supportive of cash match requirements that the HMIS Lead Agency may need regarding renewal of the HMIS HUD grant.
10. Will advise the HMIS Lead Agency of reporting topics for request to the software provider

11. Will provide the HMIS Lead Agency with an updated list of providers in the Continuum annually.

12. The Continuum understands that the HMIS Lead Agency will conduct periodic reviews of data and Agency participation.

13. The Continuum will hold harmless the HMIS Lead Agency from any damages, liabilities, claims, and expenses against the Participating Agencies from their participation in the HMIS Database.

14. The Continuum may choose to operate a different HMIS with 30 days written notice to the HMIS Lead Agency.

15. The Continuum will promote the issues of confidentiality, data security, and data integrity within the Continuum consistent with the HUD requirements.

16. The Continuum will follow the written policies and procedures as outlined in the HMIS Policies and Procedures Manual

USER PARTICIPATION AND PASSWORDS

Participating Agency staff utilizing the HMIS shall abide by the governing principles understood in the User Agreement. Only those staff with valid User ID and Password will be eligible to enter data within the system. User ID and Password will be the responsibility of the software provider and the User to develop. The Lead Agency will not have knowledge of the User ID or Password. Before a User ID or Password is granted, the Lead Agency must have a signed User Agreement. The HMIS Lead Agency will then contact the Software provider and advise them that the User is in compliance and will contact the software provider. The software provider will then provide the initial training to the User.

Upon leaving the Agency, the User or Participating Agency is responsible for notifying the HMIS Lead Agency of the departure.

No sharing of User ID or Password is allowed. The HMIS Lead Agency or Participating agency has the right to rescind the use of the HMIS to the User. The User will then become an inactive participant.

Subject to the licensing requirements, Participating Agency is allowed one computer site. More than one User may access data but only at the designated computer site. If the Participating Agency requires more than one computer site, they should contact the HMIS Lead Agency for instructions. More than one site requires additional funding.

COLLECTION AND ENTRY OF CLIENT DATA

Client data is gathered according to the policies, procedures and confidentiality rules of each participating agency. In addition, client data will be gathered consistent with the guidelines of the HUD requirements. It is the understanding that Violence Against Women Act and HIPPA compliance will affect the entering of data for the Continuum. Client data will be entered into the system in a timely manner and should be completed within 48 hours after receiving data. **Client data will be entered with the client's consent and no services will be denied if the client refuses to participate in the HMIS.** Participating Agencies are responsible for the accuracy, integrity, and security of their data input by said agency. The HMIS Lead Agency will only share data consistent with the guidelines established for sharing of data. The Lead Agency will share quarterly reports with the Continuum utilizing the data collected by the Participating Agencies.

RELEASE AND DISCLOSURE OF CLIENT DATA

Sharing of data within the Continuum is only completed with the client data where permission by the client has been obtained. Sharing of data may be limited dependent upon program specific confidentiality rules. Where agencies have chosen to blank out,

this data will not be shared. Within the Continuum, consistent with the Violence Against Women Act, no domestic violence program will be entering data therefore any sharing would be aggregate data from the domestic violence program. When utilizing a release of information form, it is imperative that the consent must be informed consent. It is the responsibility of the intake worker to ensure that the consent is informed. As part of the intake, the intake worker should explain the reason for collecting the data, the rights of the client, and any potential future use of the collected data. A sign should be posted for the client to see. Aggregate data obtained by the Lead Agency will not be shared with any internal or external agent without advising the Participating Agency of such. Each Participating Agency is responsible for his or her agency's internal compliance with the HUD Data Standards. At such time as required, collected data will be utilized to comply with HUD or other funding requests. Such would be the Annual Program Report or the Annual Homeless Assessment Report.

SERVER SECURITY

It is the responsibility of the software provider, MISI to strive to secure and keep secure the servers, both physically and electronically. Data is encrypted and taken off site daily to insure that date is safe and secure.

SERVER AVAILABILITY

The ROSIE software provided by MISI will strive to maintain continuous availability by design and by practice. Any necessary downtime will be scheduled when it will have the least impact upon the Participating Agency. The software provider has a back up and recovery plan. Any downtime can be reported to the HMIS Lead Agency.

WORKSTATION SECURITY

The Participating Agency is responsible for preventing degradation of the whole system resulting from viruses, intrusion or other factors under the agency control. They are also responsible for preventing the inadvertent release of client confidential information. They thus are responsible for ensuring that computers used are not set up in public sites, any physical access to the data, or electronic access is available. All computers used for HMIS data collection must have a firewall, virus protection. At a minimum they must have the ability to have anti virus software that will update with current virus definitions and run a weekly full system scan. They also must have internet connection as the system is an internet program.

TRAINING

The HMIS Lead Agency will work with the software provider to promote and provide training for the Participating Agency User staff. Training is provided before the User may begin to enter data. Training will be provided quarterly. The majority of training will be online training to facilitate participation due to large geographic distances within the Continuum. Additional training and oversight will be provided by the HMIS Lead Agency. The Continuum and Participating Agency may request different training topics from the HMIS Lead Agency. The Lead Agency will work with the software provider to facilitate the training requests.

TECHNICAL SUPPORT

It is the responsibility of the Lead Agency to ensure that technical support is provided to the Participating Agencies. It will be provided by the Lead Agency or the Software Provider. Requests for support can be made in writing, email or by phone. All requests will be handled in a prompt and timely matter. Technical support

will include assisting Participating Agencies, conducting on site visits to ensure compliance, review of reports generated, coordinating on going training, assisting with computer security, and other issues that may arise.

The policies and procedures identified are deemed to provide assistance to the Participating Agency, Continuum and HMIS Lead Agency in the implementation of the HMIS.
These are deemed to be a baseline and an ongoing document that will need revision and updating on a regular basis to comply with the HUD requirements as well as to comply with the needs of the Continuum.

The HMIS is a system by which the Continuum and Participating Agencies can identify the homeless being served in their communities, a document for planning on serving the homeless and a document to assist in obtaining funding for serving the homeless.

In the preparation of this document other policies and procedures manuals were reviewed. These include the Idaho Homeless Management Information System (HMIS) Policy and Procedures, Blue Ridge HMIS Policies and Procedures (Council of Community Services Gateway to information and planning) , and Santa Clara County Homeless Management Information System Policies and Procedures ((HMIS SCC Project Staff Community Technology Alliance).

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ATTACHMENTS