

City of Cambridge
Homeless Management Information System (HMIS)

POLICIES & PROCEDURES

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Planning & Development Division
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Revision History

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This document provides the framework for the ongoing operations of the City of Cambridge Homeless Information Management System (HMIS).

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1 PROJECT OVERVIEW

The purpose of the Cambridge Homeless Management Information System (CambridgeHMIS) is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in the City of Cambridge. The long-term vision of HMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities. Accurate information will put the City of Cambridge Continuum of Care in a better position to plan for future needs and meet the reporting requirements of the U.S. Department of Housing and Urban Development (HUD).

The mission of the Cambridge Continuum of Care HMIS is to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will meet Federal requirements and also enhance service planning and delivery.

The fundamental goal of HMIS is to record the demographics of homelessness in Cambridge according to the HUD HMIS and Data Standards. The project aims to identify patterns in the utilization of assistance, and document the effectiveness of services for clients. This will be accomplished through analysis of data that are gathered from individuals and families experiencing homelessness and from the service providers who assist them in shelters and homeless assistance programs throughout the City.

Data that are gathered via intake interviews and program participation will be used to complete HUD Annual Progress Reports. These data may also be analyzed to provide unduplicated counts and anonymous aggregate data to various stakeholders in the Continuum of Care. The project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the City. Access to the central server is limited to agencies formally participating in the project and then only to authorized staff members who meet the necessary training and security requirements.

The City's Planning and Development Division within the Department of Human Service Programs (DHSP) staffs and is the lead agency for HMIS. DHSP Grants Managers are the authorizing agents for all agreements made between Partner Agencies and DHSP. HMIS Project Staff are responsible for the administration of the web-based application and user access. HMIS Project Staff also provide technology, training and technical assistance to users of the system throughout the City.

The CoC HMIS Committee provides oversight and guidance to HMIS. This group is committed to balancing the interests and needs of all stakeholders involved: individuals and families experiencing homelessness; service providers; case managers and end users; funders; and policymakers.

Potential benefits of HMIS include:

- Improved service coordination when information is shared among case management staff within one agency or with staff in other agencies (with written client consent) who are serving the same clients;
- Aggregated information that can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for resources, complete grant applications, conduct evaluations of program services, and report to funding agencies such as HUD;
- Capacity to generate HUD Annual Performance Reports (APRs) for SHP and HPRP grants, and eventually for ESG programs in the Continuum of Care, and other HUD reports such as the AHAR, HIC and PULSE;
- Aggregated information that will assist in identification of gaps in services, as well as the completion of other reports used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

2 GOVERNING PRINCIPLES

The overall governing principles upon which all decisions pertaining to HMIS are based are described below. Participants are expected to read, understand and adhere to the spirit of the principles, even when the Policies and Procedures do not provide specific direction.

Confidentiality

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

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

Data Integrity

Client data are the most valuable and sensitive asset of HMIS. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

System Availability

The availability of a centralized data repository is necessary to achieve the ultimate citywide aggregation of unduplicated homeless statistics. HMIS Project staff are responsible for ensuring the broadest deployment and availability for homeless service agencies in the City of Cambridge.

Compliance

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

3 ROLES AND RESPONSIBILITIES

City of Cambridge Continuum of Care

CoC HMIS Committee

- Project direction and guidance
- Approval of project forms and documentation
- Project participation and feedback

City of Cambridge, DHSP

Planning and Development Division

- Lead agency for HMIS administration and overall responsibility for project
- Project funding
- Liaison with HUD
- Project Staffing
- Procurement of software and licenses
 - Selection of system software
- Manage contract with software vendor
- User Administration
 - Add and remove partner agency HMIS administrators
 - Manage user licenses
- Creation of project forms and documentation
- Project policies and procedures compliance
- Signatory for Memorandums of Understanding
- Keeper of Signed Memorandums of Understanding

Training Coordinator

- Adherence to HUD Data Standards
- Application customization
- Curriculum development
- Training documentation
- Confidentiality training
- Application training for Agency Administrators and End Users
- Outreach/end user support
- Training timetable
- Helpdesk

Data Analyst

- Adherence to HUD Data Standards
- Application customization

- Data monitoring
- Data validity
- Aggregate reporting and extraction
- Assist Partner Agencies with agency-specific data collection and reporting needs (within reason and within constraints of other duties)

Partner Agency

Any agency, group, or other entity that has completed an Agency Agreement with DHSP is a Contributory HMIS Organization (CHO), or Partner Agency. All Partner Agencies must abide by all policies and procedures outlined in this manual, which are subject to change. Partner Agencies must complete an Agency Agreement with DHSP before gaining access to HMIS. Partner Agencies are responsible for the conduct of their End Users and the security of End User Accounts.

Partner Agency Executive Director

- Authorizing agent for Partner Agency Agreement
- Designation of HMIS Agency Administrator
- Agency compliance with Policies & Procedures
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards. Annually, Partner Agencies will conduct a thorough review of internal policies and procedures regarding HMIS.

Partner Agency Administrator

Each Partner Agency will designate an HMIS Agency Administrator to serve as primary contact between DHSP and the Partner Agency, and send that person's name and contact information to HMIS Project Staff. Changes to that information should be promptly reported to DHSP. HMIS Agency Administrators are responsible for:

- Program compliance with Policies & Procedures
- Being the Authorizing agent for Partner Agency User Agreements
- Keeping Executed Client Informed Consent forms
- Being the Authorizing Agent for User ID requests
- Ensuring the suitability of Staff workstations
- Internet connectivity
- End user adherence to workstation security policies
- Detecting and responding to violations of the Policies & Procedures
- Providing First level end user support
- Maintaining agency/program data in HMIS application
- Being the Authorizing agent for Data Quality Monitoring

Agency Staff

- Safeguard client privacy through compliance with confidentiality policies
- Data collection as specified by training and other documentation

Non-CambridgeHMIS Partner Agency

Agencies using a comparable HMIS must either provide DHSP access to their HMIS system, or submit data to DHSP on at least a quarterly basis. Data should be submitted in the .csv format specified by HUD (see [HUD HMIS Comma-Separated Value Format Documentation](#)). Non-CambridgeHMIS Partner Agencies must assign a staff member to be the primary point of contact with HMIS Project Staff.

4 OPERATING PROCEDURES

1. Security and CambridgeHMIS Access

Social Solutions, Inc. will host the CambridgeHMIS ETO Software. Each Agency is responsible for providing and maintaining computer hardware and Internet service. Each administrative staff or end user that a participating agency determines will have access to ETO Software will be issued a user license (login ID and password) once their initial training is complete and the *CambridgeHMIS Partner Agency User Agreement Form* has been signed.

(a) End User Accounts

HMIS Project Staff will provide an End User Account username and initial password to each authorized End User once the initial HMIS training has been completed and the *CambridgeHMIS Partner Agency User Agreement Form* has been signed. End User Accounts are assigned on a per-person basis, rather than to a particular position or role. End User Accounts are not to be exchanged, shared, or transferred between personnel at any time. Sharing of End User Accounts is a breach of these Policies and Procedures and a violation of the *Partner Agency Agreement* and the *Partner Agency User Agreement Form*.

Under no circumstances shall a Partner Agency demand that an End User hand over his or her username and password. Partner Agency's shall inform the Technology Director of any changes in personnel or other requests to revoke or transfer accounts.

Licenses and access to ETO Software will be cancelled immediately for any staff that terminates employment or changes roles where ETO Software access is no longer required. The Participant Agency's Administrator will notify the CambridgeHMIS System Administrators of staff changes within seven (7) business days.

(b) End User Inactivity

End Users who have not logged into the system in the previous 90 days will be flagged as inactive. Inactive End Users may have their CambridgeHMIS accounts locked or removed to maintain the security, confidentiality, and integrity of the system.

(c) User Access Levels

The Partner Agency shall designate one User to be the Site Manager, identify and approve their respective users, and determine ETO Software user access level for their respective users. The level will be based on each user's job function as it relates the ETO Software's data entry and retrieval process. HMIS Project Staff will aid in the determination of HMIS User access level when requested.

(d) Passwords

End User Account passwords should never be written on any item left in their office, desk, or other workspace, and passwords should never be in view of any other person.

(e) Connectivity and Computer Systems

Partner Agencies will connect to CambridgeHMIS independently via the internet and are responsible for providing their own internet connection and computer systems sufficient for doing so. HMIS Project Staff may provide consultation or advice in securing sufficient internet connectivity and computer systems. HMIS Project Staff provides technical support to Partner Agency's solely for CambridgeHMIS.

(f) Workstation Security

At a minimum, the primary workstation used by each End User to log in to CambridgeHMIS should be configured to meet the following best practices:

- Password-protected log on for the workstation itself;
- Password-protected (aka locked) screensaver after five minutes or more of inactivity;
- Operating system updated with manufacturer's latest patches at least weekly;
- Ports firewalled;
- Using Internet Explorer to connect to CambridgeHMIS;
- Systems scanned at least weekly for viruses and malware.

HMIS Project Staff may provide some recommendations or advise in pursuing these best practices, but proper workstation configuration remains the responsibility of each Partner Agency.

(g) Local Data Storage and Transfer

Partner Agency Users are responsible for maintaining the security and confidentiality of any client-level data extracted from the database and stored locally, including all data used in internal reporting. No identifiable client-level data is to be transmitted unless it is properly protected. Security questions should be addressed to HMIS Project Staff.

(h) Remote System Access

Partner Agencies and End Users must abide by these Policies and Procedures and ensure the security and confidentiality of client data regardless of the computer used to log in to the system. For this reason, End Users are strongly cautioned against extracting and storing personally identifiable client information on their personal computers and internet devices.

(i) Client Access to Records

Clients may not be denied access to their own records. Clients have the right to see their information contained in ETO Software. If a Client requests, the Participant/User must review the information with the client.

(j) Training

HMIS Project Staff will coordinate adequate and timely training for all End Users prior to issuing an End User Account. Additionally, HMIS Project Staff will post training aids, reference material, and other support on the CambridgeHMIS website.

2. Data Collection and Entry

(a) Standard Data Collection

It is the responsibility of Agencies and respective users to ask for all required data elements (Universal Data Elements and Program-Specific Data Elements) from each client entered into the HMIS. Complete and accurate data is essential to the system’s success; however it is important to note exceptions:

- Clients may refuse to provide information without being denied services.
- In the case where there is a conflict with collecting data and the provision of quality services and/or client safety, providers should not enter personal identifying information.

Although each participant will use the HMIS in various capacities, the minimum data fields required for all providers regardless of funding source are detailed in Table A below. HUD has mandated these universal data elements for all clients entered into a HMIS. For providers receiving HUD McKinney funding (SHP, SPC, ESG) there are additional program specific data elements which are detailed in Table B. Please refer to the HMIS Data Standards, March 2010, for more information on data elements required by HUD. Other Local Data Elements (LDE) and data collection protocols will be set by the HMIS Lead Agency as-needed for adequate data analysis and meeting objectives of local plans.

Table A: Universal Data Elements

The following HUD-mandated Universal Data Elements will be collected for the purposes of gathering unduplicated estimates of the number of homeless people accessing services from homeless providers, basic demographic characteristics of people who are homeless, and their patterns of service use.

1	Name	9	Residence Prior to Program Entry
2	Social Security Number	10	Zip Code of Last Permanent Address
3	Date of Birth	11	Housing Status
4	Ethnicity	12	Program Entry Date
5	Race	13	Program Exit Date
6	Gender	14	Unique Person Identification Number*
7	Veteran Status	15	Program Identification Number*
8	Disabling Condition	16	Household Identification Number*

*System generated

Table B: Program Specific Data Elements for McKinney Funded Users

The following Program-Specific Data Elements will be collected for programs that are required to report to HUD and other organizations. Other agencies without this reporting requirement may also collect these elements to facilitate a better understanding of the homeless population in the City of Cambridge.

1	Income and Sources	12	Reasons for Leaving
2	Non-Cash Benefits	13	Date of Contact
3	Physical Disability	14	Date of Engagement (only required for outreach programs)
4	Developmental Disability	15	Financial Assistance Provided
5	Chronic Health Condition	16	Housing Relocation and Stabilization Services
6	HIV/AIDS	17	Employment
7	Mental Health	18	Education
8	Substance Abuse	19	General Health Status
9	Domestic Violence	20	Pregnancy Status
10	Services Received	21	Veteran’s Information
11	Destination	22	Children’s Education

Service and Shelter Records includes Bed Register and HPRP-specific service fields (if applicable).

Extended Data are optional and include Case Notes, Goals, Action Steps, Follow-Up Plans, Needs, Referrals and Self-Sufficiency Matrix measurements.

(b) Informed Client Consent

Partner Agencies will collect and retain signed client consent forms before any client data will be entered into the CambridgeHMIS. Partner Agency staff will thoroughly explain the client consent to each client. CambridgeHMIS will provide a standard *CambridgeHMIS Informed Consent and Release of Information Authorization Form* to all Partner Agencies. If client consent is not obtained, the Partner Agency will enter the de-identified data into an anonymous client record that is minimally necessary for the purposes of tracking of units of service. Clients cannot be denied services if consent to data collection is not given.

(c) Appropriate Data Collection

CambridgeHMIS End Users will only collect, enter or access Clients in the HMIS that exist as Clients under the User’s area of service. End Users will only collect data relevant to the delivery of services to people experiencing a housing crisis in the City of Cambridge.

(d) Data Element Customization

Data element customization will be provided as needed, e.g. special projects such as preventive homeless projects in which the HMIS database is used for this data collection. Data customization will only be done after approval by the CoC HMIS Committee and under the direction of HMIS Project Staff.

3. Quality Assurance

(a) Commitment to Data Quality

Partner Agencies are responsible for timely, accurate, and complete entry of client-level data.

(b) Data Element Completion

For each type of data element, the following completion rates are expected.

Data Element Type	Element Completion (overall completion per element)		
	Low	Minimum	Target
Universal Data Element (UDE)	<90%	90%	98%
Program Specific Data Element	<85%	85%	95%

(c) Data Integrity Expectations and Support

To ensure high quality data and ease in the generation of reports and analysis, the following data integrity expectations and supports will be observed:

- Data will be entered in a timely manner, within 5 working days following client contact.
- The HSPC HMIS Data Committee will develop a Data Quality Monitoring Plan that will define expectations for timeliness, accuracy and completeness of data, and establish timelines for monthly data quality monitoring.
- HMIS Staff will provide support to Partner Agencies as-needed for corrections of data.

4. Data Retrieval

(a) Partner Agencies

Partner Agencies will have access to retrieve any client-level data entered by their programs, other data as defined by the data sharing policies and procedures in this manual, and by the *CambridgeHMIS Informed Consent and Release of Information Authorization Form*.

(b) HMIS Project Staff

HMIS Project Staff will have access to retrieve all data in the CambridgeHMIS. HMIS Project Staff will not access individual client data for purposes other than maintenance, troubleshooting, providing reports, and checking for data integrity.

(c) Social Solutions, Inc.

Social Solutions will not access the system except for purposes of software maintenance, troubleshooting, and data conversion.

(d) Client

Any client will have access to view, or keep a printed copy of, his or her own records contained in the CambridgeHMIS within a reasonable period of time. No client shall have access to another client's records in the CambridgeHMIS.

(e) Continuum of Care

HMIS Project staff will provide de-identified and aggregate reports to the Continuum of Care as-needed in support of its mission to prevent, reduce, and eliminate homelessness.

(f) Public

CambridgeHMIS, in consultation with the HSPC HMIS Committee, will address all requests for data from entities other than Partner Agencies or clients. No client-level data will be provided to any party, even a client requesting their own data, unless the Partner Agency who entered the data is unable to satisfy the client's request. All requests from the public for HMIS reports must be made in writing. HMIS Project Staff will compile and publish certain periodic reports for public consumption regarding homelessness and housing issues in the City of Cambridge based on data available in HMIS. At no time will published, publicly-available reports contain client-level or identifiable data.

(g) Ethical Data Use

Data contained in the CambridgeHMIS will only be used to support the delivery of homeless and housing services in Cambridge. Each HMIS End User will affirm the principles of ethical data use and client confidentiality contained in this Policies and Procedures Manual and the *HMIS End User Agreement*.

(h) Access to Core Database

No one will have direct access to the CambridgeHMIS database. Access is provided solely through the Social Solutions ETO software.